



2017 GRI Content Index

NIBC Holding N.V.



About This Report

NIBC is pleased to provide this Content Index as part of NIBC's commitment to the Global Reporting Initiative (GRI).

For 2017, NIBC is reporting under the latest GRI Standards, which companies are asked to adopt no later than 30 June 2018. NIBC transitioned to the new Standards in its 2016 report. NIBC complies with the Core reporting option of the GRI Standards.

For increased transparency, we have also provided many disclosures which are only required at the Comprehensive level. These additional elements are linked and aligned by GRI to other important initiatives like **CDP's** environmental reporting system.

We chose to take these steps as part of our efforts to increase transparency towards stakeholders, an aspect which our stakeholders have indicated is highly material to them. NIBC views transparency as a foundation for trust, an aspect which we do not take for granted and continuously aim to earn.

In addition to references to our Annual Report or other disclosures, where possible we also provide references to our policies. We believe this linkage between policies and results provides clarity in terms of the effectiveness of our approach.

For easy reference and comparability, references to the new GRI Standards and older G4 are provided for each element, as well as whether or not the element is required under the Core option. In many cases, we have provided descriptive responses in addition to links to our Annual Report and other publications. We have also provided direct responses for each element of the GRI Financial Sector supplement, which was required for banks under GRI G4. The Financial Sector elements are provided at the end of this Content Index.

As a signatory of **UN Global Compact (UNGC)**, NIBC has also provided references to related UNGC principles and **Sustainable Development Goals (SDGs)** where appropriate.


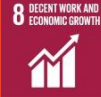



Every effort has been made to provide complete and clear information in our disclosures. For clarity, any references to our Annual Report refer to appropriate pages and sections within the 2017 NIBC Holding N.V. Annual Report and related report supplements. Any omissions are indicated within each disclosure.

Feedback Welcome


Your feedback on our disclosures is welcome and greatly appreciated.



If you have any questions or have feedback that you would like to share, please contact us at csr@nibc.com or use the contact details available on our corporate website www.nibc.com

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
GRI 102, General Disclosures						
I02-1	G4-3	Name of the organization	Core	NIBC Holding N.V.		
I02-2	G4-4	Activities, brands, products, and services	Core	Annual Report - At a Glance, p4-7 - Report of the Managing Board, p14-17		
I02-3	G4-5	Location of headquarters	Core	The Hague, Netherlands		
I02-4	G4-6	Location of operations	Core	Annual Report, - At a glance, p4-7 NIBC holds offices in the Netherlands, Belgium, Germany, and the United Kingdom.		
I02-5	G4-7	Ownership and legal form	Core	NIBC Holding is privately held by an investor group which is organized and led by JC Flowers & Co LLC. NIBC Bank is the most significant asset. NIBC Holding and NIBC Bank are unlisted. In 2017, NIBC announced possible future changes to its ownership structure which may occur during 2018. NIBC's legal form is N.V. (Naamloze Vennoootschap), a type of public company which is common among leading corporates in the Netherlands.		
I02-6	G4-8	Markets served	Core	Annual Report - At a Glance, p4-7 - Report of the Managing Board, p 14-19		


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
I02-7	G4-9	Scale of the organization	Core	Annual Report - At a Glance, p4-7 - Key Figures, p8-9		
I02-8	G4-10	Information on employees and other workers	Core	Annual Report - At a Glance, p4-7 - Key Figures, p8-9 - Our People, p50-54 Website - Sustainability Report (published April) nibc.com/sustainability Our 2017 Sustainability Report (published April) on our corporate website provides additional details on our people. nibc.com/sustainability/	6	 
I02-9	G4-12	Supply chain	Core	Annual Report: - Value flow, p63 Website - Sustainability Report (published April) nibc.com/sustainability NIBC's supply chain is limited in scope, consisting mostly of service companies such as IT, legal service providers, and communication service providers. Most of these suppliers are located in the same operating geographies as NIBC. Further details on our value chain are provided on our corporate website. nibc.com/sustainability/		 
I02-10	G4-13	Significant changes to the organization and its supply chain	Core	Annual Report - Letter from the CEO, p11-13 - Value flow, p63 In 2017, NIBC announced possible future changes to its ownership structure which may occur during 2018.		




GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-11	G4-14	Precautionary Principle or approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Risk Management, p89-103 - Sustainability p55-61 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance nibc.com/about-us/corporate-governance/ - Sustainability Governance nibc.com/sustainability/sustainability-governance/ <p>NIBC applies the Precautionary Principle through its risk management and compliance approach toward potential environmental and social impact. Our sustainability framework and related policies govern our approach toward environmental and social concerns.</p> <p>New products and significant changes to existing products are also assessed for their social (incl human rights) and environmental impact as part of NIBC's new product (NPAP) and significant change (SCAP) procedures and approval processes.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-12	G4-I5	External initiatives	Core	<p>Annual Report Non-financial reporting, p57</p> <p>Website: - Corporate Governance nbc.com/about-us/corporate-governance/ - Sustainability Governance nbc.com/sustainability/sustainability-governance/ - Sustainability Report (published April) nbc.com/sustainability</p> <p>Externally-developed economic, environmental and social charters, principles, or other initiatives which NIBC endorses and applies include: Dutch Banking Code Dutch Corporate Governance Code Equator Principles (member institution) UN Global Compact (signatory) Dutch IMVO/SER banking sector covenant (signatory) Universal Declaration of Human Rights (by policy) UN Guiding Principles for Business and Human Rights (by policy) OECD Guidelines for Multinational Enterprises (by policy) ILO Core Conventions (by policy) UN PRI (by policy) UNEP FI (by policy) UN Convention on the Elimination of All Forms of Discrimination against Women (by policy) UN Declaration on the Rights of Indigenous Peoples (by policy) UNICEF Convention on the Rights of the Child (by policy) Wolfsberg Principles (by policy) FATF recommendations (by policy) Responsible Ship Recycling Standards (by policy)</p> <p>Additional external principles and charters applied by NIBC are stated in our corporate governance, compliance and sustainability policies.</p>	I-10	


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-13	G4-I6	Membership of associations	Core	37 NIBC employees are member of a Dutch Banking Association (NVB) or Dutch Association of Covered Bond Issuers (DACB). Paulus de Wilt is board member of the Dutch Banking Association (NVB). Herman Dijkhuizen is member of the Commission Supervision of the Dutch Banking Association (NVB).		
102-14	G4-I	Statement from senior decision-maker	Core	Annual Report, - Letter from the CEO, p11-13		
102-15	G4-2	Key impacts, risks, and opportunities		Annual Report, - SWOT analysis, p70 - Risk Management, p89-103 - Sustainability, p57-61 Website - Sustainability Report (published April) nibc.com/sustainability NIBC supports its clients to achieve their transition towards more sustainable business. The main environmental risk for NIBC is climate risk as a result of greenhouse gas emissions from traditional business sectors like Shipping & Intermodal and Offshore Energy. The salient human rights risks for NIBC are labour conditions and worker safety in corporate client supply chains.		
102-16	G4-56	Values, principles, standards, and norms of behavior	Core	Annual Report, - At a glance, p4-7 - CEO Letter, p11-13 - Vision & Strategy, p14 - Banking on Trust, p53 Website, - Vision and Principles, nibc.com/about-us/vision-and-principles/ - Code of Conduct, nibc.com/about-us/corporate-governance/	10	

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>During 2017, NIBC fully revised our Code of Conduct following consultations with staff and external stakeholders. The updated Code was approved by NIBC's Executive Committee. The new Code was relaunched in Q4 and followed by an internal awareness campaign and e-learning for all staff.</p> <p>As part of their employment contract, each staff member has agreed to adhere to the NIBC code of conduct. Dutch staff also sign the Bankers Oath, which is also displayed prominently in NIBC's offices in the Hague and Amsterdam. Training on NIBC's values, ethics, and code of conduct are provided regularly to all staff. Compliance and integrity training is also obligatory for all new employees when they join NIBC.</p> <p>The updated Code applies NIBC's internal policy structure which requires a defined owner within the organisation, version management, and other standard aspects.</p>		
102-17	G4-57, G4-58	Mechanisms for advice and concerns about ethics		<p>Annual Report</p> <ul style="list-style-type: none"> - Sustainability, p58-59 - Complaints, p318 <p>Website:</p> <ul style="list-style-type: none"> - Grievances and complaints, nibc.com/about-nibc/contact-nibc/complaints-form/ - Code of Conduct, nibc.com/about-us/corporate-governance/ - Whistleblowing, nibc.com/about-us/corporate-governance/compliance/ <p>NIBC offers an online complaints and grievance mechanism on its website. Internal whistleblowing procedures are available to employees on NIBC's intranet. These mechanisms are included in guidance provided to employees for NIBC's Code of Conduct.</p> <p>NIBC's whistleblowing policy was updated during 2017. All staff were retrained on the updated policy during Q2 and Q3. By policy, requests for advice or concern are treated confidentially by designated</p>	10	

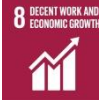

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>trust persons. This mechanism also can be used anonymously.</p> <p>During 2017, NIBC participated in the Dutch IMVO agreement for the banking sector which in part has a focus on grievance and remedy mechanisms for large projects and corporate loans. Other partners to the agreement include peer banks, national authorities, and civil society organisations. Learnings from this initiative could lead to future refinements to our approach in this area.</p>		
102-18	G4-34	Governance structure	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Report of the Supervisory Board, p71-84 - Corporate Governance, p85-88 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance nibc.com/about-us/corporate-governance/ - Sustainability Governance nibc.com/sustainability/sustainability-governance/ 		
102-19	G4-35	Delegating authority		<p>Annual Report:</p> <ul style="list-style-type: none"> - Report of the Supervisory Board, p71-84 - Corporate Governance, p85-88 - How we manage sustainability, p56-57 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance nibc.com/about-us/corporate-governance/ - Sustainability Governance nibc.com/sustainability/sustainability-governance/ <p>NIBC has appointed a Senior Sustainability Officer to be responsible for sustainability and corporate social responsibility who reports directly to the Executive Committee for these topics.</p>		


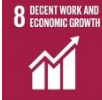
GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
I02-20	G4-36	Executive-level responsibility for economic, environmental, and social topics		<p>Annual Report - How we manage sustainability, p56-57</p> <p>Website - Sustainability Governance nibc.com/sustainability/sustainability-governance/</p> <p>NIBC's Executive Committee is responsible for economic, environmental and social topics. Sustainability matters are monitored and reported periodically to the ExCo and the Risk Policy & Compliance Committee (RPCC), a subcommittee of NIBC's Supervisory Board.</p>		
I02-21	G4-37	Consulting stakeholders on economic, environmental, and social topics		<p>Annual Report: - Non-financial reporting, p57-61 - Stakeholder engagement, p61-67</p> <p>Website - Sustainability Report (published April) nibc.com/sustainability - Materiality Assessment annualreport2017.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p>		 


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-29	G4-45	Identifying and managing economic, environmental, and social impacts		<p>Annual Report</p> <ul style="list-style-type: none"> - Non-financial reporting, p57-61 - Stakeholder engagement, p61-67 - Materiality Assessment annualreport2017.nibc.com/ <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance nibc.com/sustainability/sustainability-governance/ <p>NIBC's Executive Committee is responsible for economic, environmental and social topics. Sustainability matters are monitored and reported periodically to the ExCo and the Risk Policy & Compliance Committee (RPCC), a subcommittee of NIBC's Supervisory Board.</p> <p>Stakeholders are regularly consulted to identify and prioritize the issues which are most material and the potential material and salient impacts, risks, and opportunities. These are mentioned in the risk management section of our Annual Report and elaborated in NIBC's materiality assessment.</p>		
102-30	G4-46	Effectiveness of risk management processes		<p>Annual Report:</p> <ul style="list-style-type: none"> - At a Glance, p4-7 - Key Figures, p8-9 - Non-financial reporting, p57-61 <p>Two non-financial key indicators are reported in NIBCs annual report as an indication of effectiveness: % of corporate loans screened and Number of new clients with potential increased risks.</p> <p>During 2017, no severe environmental incidents related to NIBC's financings, own operations or supply chain were reported. During 2017 no severe human rights incidents related to NIBC's financings, own operations, and supply chain were reported. During 2017, there were no reportable leaks, thefts, or losses of customer data nor any complaints regarding breaches of customer privacy and</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>losses of customer data.</p> <p>In our Annual Report we further describe the material and salient risks, how we mitigate them, and the areas where we see potential emerging risks.</p>		
102-31	G4-47	Review of economic, environmental, and social topics		<p>Annual Report - How we manage sustainability, p56-57</p> <p>These aspects are reviewed quarterly by NIBC's Risk Management Committee including regular reviews, in-control processes, and recording of any events.</p> <p>Sustainability matters are monitored and reported periodically to the ExCo and the Risk Policy & Compliance Committee (RPCC), a subcommittee of NIBC's Supervisory Board.</p>		
102-32	G4-48	Highest governance body's role in Sustainability Reporting		<p>Annual Report - Supervisory Board, p78 - Corporate responsibility reporting scope, p313</p> <p>NIBC's Annual Report is an integrated report. We have chosen to combine all our financial, economic, social and environmental information into one document because all these factors are integral to NIBC's strategy and operations. By providing this additional information we aim to increase transparency for all of our stakeholders and to allow them to make a more informed assessment of NIBC and how we are creating and sustaining value.</p> <p>The Annual Report is drawn up by the Managing Board and reviewed and approved by our Supervisory Board.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-33	G4-49	Communicating critical concerns		<p>Annual Report - How we manage sustainability, p56-57</p> <p>Concerns are communicated in a variety ways depending on the nature, materiality and severity of the concerns. This includes direct discussions with the Executive Committee, reports and presentations to the Executive Committee and subcommittees of the Supervisory Board, stakeholder meetings, engagement with the Sustainability team, and communications with clients.</p>		
102-34	G4-50	Nature and total number of critical concerns		<p>Annual Report: - Non-financial reporting, p57-58</p> <p>During 2017 no severe environmental or human rights incidents related to NIBC's financings, own operations, and supply chain were reported.</p>		
102-35	G4-51	Remuneration policies		<p>Annual Report, - Remuneration report, p80-84</p> <p>Website - Corporate Governance nibc.com/about-us/corporate-governance/supervisory-board/ - Compliance with Banking Code, p6 nibc.com/about-us/corporate-governance/governance-codes/</p> <p>NIBC's remuneration policy is annually reviewed and amended to fulfill relevant laws, regulations and guidelines.</p> <p>The remuneration policy has a long term focus and is in line with the bank's risk policy. All employees have a pre agreed set of financial and non-financial (at least 50%) targets.</p> <p>Whether or not variable compensation is received for his/her performance, is wholly discretionary and depends on the overall financial and non-financial performance of the bank, of his respective</p>		 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				business unit, his personal performance and the relevant market levels of remuneration.		
102-36	G4-52	Process for determining remuneration		<p>Annual Report, - Remuneration p80-84</p> <p>Website - Corporate Governance nbc.com/about-us/corporate-governance/supervisory-board/ - Compliance with Banking Code, p6 nbc.com/about-us/corporate-governance/governance-codes/</p> <p>The process for determining remuneration is set out in NIBC's "Governance of remuneration policies, roles and responsibilities" document on our website and is summarized in our Annual Report.</p> <p>All employees have a pre-agreed set of financial and non-financial (at least 50%) performance targets. Their performance assessments take into account the achievement of pre-agreed targets, how they have behaved according to NIBC's Business Principles, as well as their contributions towards the Bank's longer-term objectives. Non-financial performance aspects include client satisfaction, employee satisfaction, transparency, and sustainability. The Dutch Banking Code serves as a guideline for all employees.</p> <p>Their performance assessment takes into account the achievement of pre agreed targets, how they have behaved according to NIBC's business principles, as well as their contribution towards the bank's long term objectives. One of the main non-financial performance aspects is compliance with all relevant internal requirements and external regulations. Other non-financial performance aspects include client satisfaction, transparency and sustainability.</p>		 


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-37	G4-53	Stakeholders' involvement in remuneration		<p>Annual Report, - Remuneration p90-84</p> <p>Views from stakeholders on our remuneration policy are received as part of our regular stakeholder dialogues and are considered in the remuneration process.</p> <p>Their influence is visible in our control framework which ensures that remuneration practices do not result in incentivising and / or rewarding excessive risk taking which could lead to the actions or lack of actions as defined in the risk tolerance statements, as well as unwanted behaviors relating to market conduct, reputational risks, etc..</p> <p>Furthermore, the framework ensures that NIBC's remuneration policies and practices do not lead to reward for failure, amongst others by ensuring that any performance which is rewarded, is aligned with NIBC's strategy and business objectives, taking due account of the defined risk tolerances and conduct fitting for NIBC.</p>		
102-38	G4-54	Annual total compensation ratio		<p>Annual Report, - Remuneration p80</p> <p>The 2017 annual compensation ratio for the organisation was 12. Ratios by location were 12.39 (NL), 8.37 (UK), and 10.35 (DE). Annual salary, cash bonus, deferred cash bonus, phantom share units, and restricted phantom share units were included in the calculations. Full time employees were included in the calculations.</p>		
102-39	G4-55	Percentage increase in annual total compensation ratio		<p>Annual Report, - Remuneration p80</p> <p>The 2017 compensation ratio increased by 0.8% from 2016 (x11.90) and 2017 (x12.00).</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-40	G4-24	List of stakeholder groups	Core	<p>Annual Report: - Stakeholder engagement, p61-67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>NIBC's stakeholder groups include corporate and retail customers, employees, equity investors, rating agencies, debt investors, civil society organizations, regulators and authorities, business partners (suppliers), and press and media.</p>	1	
102-41	G4-11	Collective bargaining agreements	Core	<p>Annual Report: - Works Council, p54</p> <p>Website - Human Rights Supplement nibc.com/sustainability/sustainability-governance/</p> <p>100% of NIBC's employees are represented in formal discussions with management by a representative body, the NIBC Works Council.</p> <p>All staff are informed of any agreed changes and regularly updated by the Works Council on discussions and developments. The current employee benefit scheme was negotiated and agreed by NIBC with the Employees Council. The prior collective bargaining agreement ended per 1 January 2014.</p> <p>Through our human rights policy, NIBC also supports the right of workers to collective bargaining in our financings and investments and with suppliers.</p>	3	 


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-42	G4-25	Identifying and selecting stakeholders	Core	<p>Annual Report: - Stakeholder engagement, p61-67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>In 2017, our stakeholder consultation was performed across nine stakeholder groups representing retail clients, corporate clients, equity investors, debt investors, regulators, civil society organisations, employees, rating agencies, and press and media.</p>		
102-43	G4-26, G4-PR5	Approach to stakeholder engagement	Core	<p>Annual Report: - Employee Engagement, p51 - Stakeholder engagement, p61-67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>Throughout 2017, we engaged with a wide range of stakeholders through dedicated consultations to ensure that feedback was being shared effectively with management and across our business.</p> <p>Further, NIBC engaged in numerous sectoral and topical fora related to the business and potential impacts of the company.</p> <p>In 2017, we selected a new supplier for the Employee Engagement Survey, with a different methodology than our previous supplier. We decided to start a more extensive engagement survey among our employees in order to better understand the results. This more extensive survey will be conducted for the first time in the summer of 2018.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-44	G4-27, G4-PR5	Key topics and concerns raised	Core	<p>Annual Report: - Stakeholder Engagement, p61-67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>Key topics and concerns raised by stakeholder groups are catalogued in our annual Materiality Assessment and summarized in our annual report.</p>	1	
102-45	G4-17	Entities included in the consolidated financial statements	Core	<p>Annual Report - Principal Subsidiaries and associates, p235</p> <p>The NIBC Holding N.V. Annual Report 2017 reports on the activities of NIBC Holding N.V., including all international offices, and subsidiaries which have been established by NIBC for our business purposes.</p>		
102-46	G4-18	Defining report content and topic Boundaries	Core	<p>Annual Report: - Corporate Responsibility Reporting Scope, p313-314</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>NIBC aims to be inclusive to all of its stakeholders, providing Sustainability Report (published April) content which is material and complete and for which the context is well described.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-47	G4-19	List of material topics	Core	<p>Annual Report: - Stakeholder Engagement, p61 -67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/</p> <p>A list of material topics is provided in NIBC's Materiality Assessment report. This is further supported through regular stakeholder dialogues, both formal and informal.</p>		
102-48	G4-22	Restatements of information	Core	Any restatements of information are noted in our Annual Report.		
102-49	G4-23	Changes in reporting	Core	<p>In 2017, NIBC applied the new GRI Standards to the annual reporting of NIBC Holding. In past years our GRI content index was applied to NIBC Bank.</p> <p>For comparability to past reports we have also included GRI G4 references in this report..</p>		
102-50	G4-28	Reporting period	Core	This GRI Content Index is for the full year 2017, from 01-01-2017 until 31-12-2017		
102-51	G4-29	Date of most recent report	Core	Our prior report was published April 2016, for the period 01-01-2016 until 31-12-2016		
102-52	G4-30	Reporting cycle	Core	Annual from January to 31 December		
102-53	G4-31	Contact point for questions regarding the report	Core	<p>Annual Report - Contact information, p318</p> <p>Questions and feedback regarding NIBC's GRI Content Index and our approach towards sustainability, corporate social responsibility (CSR), environmental issues or social issues may also be addressed to csr@nibc.com</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-54	G4-32-a	Claims of reporting in accordance with the GRI Standards	Core	<p>Annual Report: - Corporate Responsibility Reporting Scope, p313-314</p> <p>NIBC has prepared its report in accordance with the latest GRI Standards, core option.</p> <p>For 2017, we have provided additional disclosures beyond GRI's base requirement for core in order to provide greater transparency for readers and stakeholders.</p>		
102-55	G4-32-b	GRI content index	Core	<p>NIBC's GRI Content Index is updated and published annually, within 30 days of the publication of our Annual Report.</p> <p>For each element, we provide direct answers, page and section references to our Annual Report, and links to other online resources and documents.</p>		
102-56	G4-32c, G4-33	External assurance	Core	<p>Annual Report - Corporate responsibility reporting scope, p313-314</p> <p>The non-financial key figures and the related processes have been audited by NIBC's internal auditors. No exceptions were reported. These figures were not externally audited in 2017.</p> <p>Our carbon footprint has been independently calculated and verified for NIBC by Climate Neutral Group, a social venture that was established in 2002 by Stichting Doen.</p>	I, 10	
GRI 103, Management Approach						
103-1	G4-DMA-a, G4-20, G4-21	Explanation of the material topic and its Boundary	Core	<p>Material Topic: Stakeholder Engagement</p> <p>Annual Report: - Stakeholder Engagement p 61-67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/</p>		



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>NIBC's stakeholders have indicated that engagement is highly important to them. Our stakeholders view engagement and product responsibility as a foundation for trust. Therefore this is a material topic for NIBC.</p> <p>The boundary and scope for engagement with stakeholders is well-defined to include those stakeholders that are directly involved in NIBC's activities as well as those who may be impacted by our operations, financings or investments and their representatives.</p>		
103-2	G4-DMA-b, G4-EN34, G4-LA16, G4-HR12, G4-SO11	The management approach and its components	Core	<p>Annual Report: - Stakeholder Engagement p 61-67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/</p> <p>As a professional, entrepreneurial and inventive financial partner, we look to build long-term relationships that are based on trust, transparency and reliability..</p> <p>We report financial and non-financial information publicly as part of our Annual Report and other disclosures. We commit to adhering to international standards in our financial and non-financial reporting.</p> <p>NIBC also engages with stakeholders in regard to economic, human rights, environmental, and other related matters. Importantly their views inform our business strategy and guide our policies and practices.</p>		
103-3	G4-DMA-c	Evaluation of the management approach	Core	<p>Annual Report: - Our People, p50-54 - Stakeholder Engagement p 61-67</p> <p>Website:</p>		

GRI Standard Number	GRI Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>- Materiality Assessment annualreport2017.nibc.com/</p> <p>NIBC has continued to increase our reporting and adjust the reporting that we provide toward topics and indicators that are important to our stakeholders.</p> <p>Our Annual Report, Pillar III, NACE Supplement GRI content index, and Sustainability Supplement are clear examples of our approach.</p> <p>Changes that are being made to our Employee Engagement Survey (EES) demonstrate that we aim to continue to strengthen our management approach.</p>		
I03-I	G4-DMA-a, G4-20, G4-21	Explanation of the material topic and its Boundary	Core	<p>Topic: Product Responsibility</p> <p>Annual Report:</p> <ul style="list-style-type: none"> - Key Figures, 8-9 - Non financial reporting, p 57-61 - Materiality, p62-67 <p>Website:</p> <ul style="list-style-type: none"> - Materiality Assessment annualreport2017.nibc.com/ <p>Stakeholders view product responsibility as part of the foundation for their trust in NIBC. They have indicated that product responsibility is highly important to them. Therefore this is a material topic for NIBC.</p> <p>All new products and services offered by NIBC undergo rigorous review as part of our NPAP approval process. Material changes to existing products go through an SCAP approval process. Aspects such as ensuring NIBC's duty of care toward clients are key considerations in these approval processes.</p> <p>We recognize that the boundary for product responsibility is broad. It is closely connected with our code of conduct and duty of care</p>		









GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				towards clients. For example, our retail savings clients expect a safe online environment. All customers expect clear, understandable, and fair term and conditions. Retail and corporate clients expect privacy and protection of their information.		
I03-2	G4-DMA-b, G4-EN34, G4-LA16, G4-HR12, G4-SO11	The management approach and its components	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Key Figures, 8-9 - Non financial reporting, p 57-61 - Materiality, p62-67 <p>Website:</p> <ul style="list-style-type: none"> - Materiality Assessment annualreport2017.nibc.com/ <p>In our markets, we have focused on corporate banking sectors in which we have the greatest impact and expertise, and where we can offer products and expertise not available elsewhere. This has been a crucial means of differentiating ourselves in a market dominated by pricing pressures.</p> <p>In Retail Banking, NIBC has followed its entrepreneurial instincts by supporting our clients by growing our buy-to-let mortgage product and through our first “originate to manage”.</p>		
I03-3	G4-DMA-c	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Key Figures, 8-9 - Non financial reporting, p 57-61 - Materiality, p62-67 <p>Website:</p> <ul style="list-style-type: none"> - Materiality Assessment annualreport2017.nibc.com/ <p>Product responsibility is best evaluated over both the short and the long term, NIBC continues to earn high score in terms of NPS and other customer surveys, a trend which has continued for a number of years. Other examples, such as results from our Special Servicing</p>		





GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
Mortgages team are also mentioned (p59) in our Annual Report						
I03-1	G4-DMA-a, G4-20, G4-21	Explanation of the material topic and its Boundary	Core	<p>Topic: Client Satisfaction</p> <p>Annual Report: - Key Figures, p8-9 - Materiality, p 62-67</p> <p>Website: - Materiality Assessment annualreport2017.nibc.com/</p> <p>Stakeholders have indicated that client satisfaction is a highly important aspect as it can be seen as an indication of future financial and non-financial performance. Therefore it is a material aspect for NIBC</p> <p>The primary measurements of client satisfaction used by NIBC are NPS score for corporate banking and the client satisfaction survey results for NIBC Direct. Though not reported in specific metrics, we also are highly aware of feedback received across all communication channels.</p>		 
I03-2	G4-DMA-b, G4-EN34, G4-LA16, G4-HR12, G4-SO11	The management approach and its components	Core	<p>Our management approach toward client satisfaction is both proactive and reactive.</p> <p>Surveys such as NPS and client satisfaction provide clear views looking backwards on how we performed. However, the overall approach includes a proactive approach to duty of care, which in our view has a big influence on client satisfaction.</p> <p>Non financial aspects including client satisfaction are taken into account as part of discretionary bonus and compensation at NIBC.</p>		




GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
103-3	G4-DMA-c	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - At a Glance, p4-7 - Key Figures, p8-9 <p>NPS for corporate banking and client satisfaction survey results for NIBC Direct have continued to show strong results in 2017. Numerous direct stakeholder discussions were held through 2017, allowing stakeholders to express their views, challenge us on our approach, and offer useful feedback on areas where we excel or should improve.</p>		
GRI 201, Economic Performance						
201-1	G4-EC1	Direct economic value generated and distributed		<p>Annual Report,</p> <ul style="list-style-type: none"> - At a Glance, p4-7 - Key Figures, p8-9 - Consolidated financial statements 105-286 <p>In addition to the information provided in our Annual Report, additional economic and financial information is available in our Pillar III report on our Annual Report website and in investor presentations on NIBC's corporate website.</p>		








GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
201-2	G4-EC2	Financial implications and other risks and opportunities due to climate change		<p>Annual Report</p> <ul style="list-style-type: none"> - Trends, p15 - Trends, p37 - SWOT Analysis, p70 <p>The transition from fossil fuels to green and electric gained momentum in 2017. In response, our Offshore Energy sector (previously known as the Oil & Gas Services sector) has redirected its strategy to actively enable our clients in their transition towards clean energy.</p> <p>Of course, the energy transition also has an impact on our Shipping & Intermodal sector; which is going through a transformation as well. Together with two other Dutch banks, NIBC has been among the first banks in Europe to set more strict standards for ship financing by drawing up the Responsible Ship Recycling Standards (RSRS). Although NIBC is not directly involved in the financing of ship recycling, we recognize that ship recycling is part of the shipping industry supply chain in which we are active. Our initiative has proven to be effective, as throughout the year 2017 several other prominent European ship finance banks joined the RSRS initiative.</p>	7	 
201-3	G4-EC3	Defined benefit plan obligations and other retirement plans		<p>Annual Report,</p> <ul style="list-style-type: none"> - Pension and Benefits, p54 - Remuneration report, p80-84 - Note 43 Employee benefit obligations, p200 <p>In 2017, in negotiation with the Works Council, new appointments were made for the annual pension contribution for the period 2018 - 2020. As part of the negotiations the Employer agreed to pay a one-off employers pension contribution of EUR 1 million to the premium reserve of the Pension Fund in of December 2017.</p>		 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
201-4	G4-EC4	Financial assistance received from government		<p>Annual Report - European Investment Bank, p42</p> <p>NIBC does not receive any financial assistance from the government for its own benefit.</p> <p>From time to time and for the benefit of our clients, NIBC does partner with governmental authorities to provide financing to clients or to co-invest in our clients.</p> <p>For example, In 2017, NIBC entered into a guarantee agreement with the European Investment Bank (EIB) that will enable NIBC to provide up to EUR 500 million of loans to innovative mid-sized enterprises in the Dutch and German markets. The Guarantee improves access to finance for companies with up to 3,000 employees and enables NIBC to offer larger amounts of senior debt financing. The operation is supported by 'InnovFin – EU Finance for Innovators' and has the financial backing of the European Union under Horizon 2020 Financial Instruments.</p>		
GRI 202, Market Presence						











GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
202-1	G4-EC5	Ratios of standard entry level wage by gender compared to local minimum wage		<p>Entry level roles within NIBC vary by department, role and responsibility level. This does result in minor statistical differences by gender.</p> <p>The ratio of standard entry level wages at NIBC is x1.91 on average (x2.03 for men, x1.8 for women) in 2017. By policy roles and responsibilities are compensated equally at NIBC. The small difference between ratio's can be attributed to location and differences of responsibilities and roles between functions. The minimum wage in the Netherlands is EUR 1565.40 as of 1 July, 2017.</p> <p>This is well above fair living wage levels in our operating locations according to wageindicator.org, which indicates a fair living wage for a single adult: EUR 1000 in the Netherlands, EUR 1140 in Germany, EUR 1040 in Belgium, and GBP 910 in the United Kingdom. According to wageindicator.org, the salaries provided by NIBC are also above the living standards to support a typical family: EUR 1470 in the Netherlands, EUR 1930 in Germany, EUR 1520 in Belgium, and GBP 1210 in the United Kingdom.</p>	6	   
202-2	G4-EC6	Proportion of senior management hired from the local community		100% of new senior management hires during 2017 were made from the countries where they are based.		
GRI 203, Indirect Economic Impacts						
203-1	G4-EC7	Infrastructure investments and services supported		<p>Annual Report, - Corporate Banking, p42</p> <p>Website - NACE supplement, annualreport2017.nibc.com/ - Sustainability Report (published April) nibc.com/sustainability</p> <p>NIBC's sector focus areas for financings and investments include Infrastructure and Renewables. NIBC also invests in these sectors through its infrastructure fund, NEIF.</p>		   










GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				Our financings and investments are commercial engagements which support a wide range of beneficial infrastructure including renewable energy, digital infrastructure, student housing, and social housing. Growth in our portfolio is being achieved in two sub-sectors: digital infrastructure and renewable energy		
203-2	G4-EC8	Significant indirect economic impacts		<p>Annual Report, - Developments and performance, p38-44</p> <p>Our support for digital infrastructure during 2017 is helping to bring green datacenters to the Netherlands and high speed connectivity to underserved rural areas of the Netherlands and UK.</p> <p>This should help to benefit local communities by empowering local businesses. This will enable a reduction in the need to commute for employees of businesses that support flexible working and reduction in travel-related emissions in support of national and international commitments related to the Paris COP21 agreement.</p> <p>Commercial real estate financings by NIBC are increasing student housing and starter residential apartments in several Dutch cities. Renovations and repurposing of properties financed by NIBC will reduce the current number of vacant properties and improve the energy efficiency in line with national efficiency targets.</p> <p>Further NIBC provided financing for several of the most sustainable new commercial building developments in the Netherlands during 2017.</p>	7, 8	 
GRI 205, Anti-Corruption						
205-1	G4-SO3	Operations assessed for risks related to corruption		<p>Annual Report - Anti-corruption, p60-61</p> <p>NIBC takes a comprehensive approach to mitigate risks related to corruption.</p>	10	 










GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				For example, all staff received mandatory training during 2017 in regard to NIBC's updated Code of Conduct and compliance policies. Furthermore all corporate clients and transactions are assessed for risks related to corruption as part of NIBC's due diligence processes. Appropriate assessments are also made as part of KYC processes for Retail Banking. Assessments are also performed for suppliers of services to NIBC.		
205-2	G4-SO4	Communication and training about anti-corruption policies and procedures		<p>Annual Report - Anti-corruption, p60-61</p> <p>Communication and training about anti-corruption are part of NIBC's regular compliance, ethics, and sustainability trainings.</p> <p>In 2017, NIBC fully revised its whistleblowing policy and procedure. Later in the year NIBC updated and relaunched its corporate Code of Conduct. All staff received mandatory training on the updated Code as well as on related compliance policies such as anti-corruption, anti-money laundering and anti-bribery. These updates demonstrate NIBC's ongoing commitment towards good corporate governance and to uphold the ten principles of the United Nations Global Compact.</p>	10	
205-3	G4-SO5	Confirmed incidents of corruption and actions taken		<p>Annual Report - Anti-fraud, p60-61</p> <p>No incidents of fraud, bribery or corruption were reported for 2017.</p>	10	
GRI 206, Anti-Competitive Behaviour						
206-1	G4-SO7	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		<p>Annual Report - Key Figures, p8-9</p> <p>No legal actions for anti-competitive behavior, anti-trust and monopoly practices were reported for 2017.</p>	10	



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
GRI 301, Materials						
301-1	G4-EN1	Materials used by weight or volume		Website - Sustainability Report (published April) nibc.com/sustainability	8	 
301-2	G4-EN2	Recycled input materials used		Website - Sustainability Report (published April): nibc.com/sustainability	8	 
301-3	G4-EN28	Reclaimed products and their packaging materials		Website - Sustainability Report (published April) nibc.com/sustainability	8	 
GRI 302, Energy						
302-1	G4-EN3	Energy consumption within the organization		Annual Report - Environmental and natural capital, p57 Website - Sustainability Report (published April) nibc.com/sustainability 100% of electricity powering NIBC's facilities is sourced from renewable energy. We manage our direct impact on the environment through an environmental sustainability programme.	8	  
302-2	G4-EN4	Energy consumption outside of the organization		Annual Report - Environment and natural capital, p57 Website: - Sustainability Policy, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/ - Environment Policy Supplement, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/ NIBC does not currently report indirect energy consumption, for example as related to our supply chain. We aspire to report on the energy efficiency of our commercial and retail real estate portfolios in a future report.	8	  





GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				NIBC does provide financing for and invests in renewable energy companies and projects. This is reported in our Annual Report and Pillar III report with "Infrastructure and Renewables" and in our NACE supplement.		
302-3	G4-EN5	Energy intensity		Website - Sustainability Report (published April) nibc.com/sustainability	8	  
302-4	G4-EN6	Reduction of energy consumption		<p>Annual Report - Environment and natural capital, p57</p> <p>Website - Sustainability Report (published April) nibc.com/sustainability</p> <p>In 2017, a third party energy audit was performed for our headquarters in The Hague. The outcome confirmed the progress we have made to date and will help to further optimise energy efficiency through future maintenance and refurbishments. The mix of building which compose our headquarters are currently rated energy label A and B.</p> <p>During 2017, NIBC Markets was relocated to a modern office space in Amsterdam ZuidAs. The new office space carries a BREAAAM 3 star rating, a significant improvement from the energy label G of the prior premises. This follows prior steps taken starting in 2016 to integrate this business onto NIBC's renewable energy contract.</p> <p>In 2017, a third party energy audit was performed for our headquarters in The Hague. The outcome confirmed the progress we have made to date and will help to further optimise energy efficiency through future maintenance and refurbishments.</p>	8	   







GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
302-5	G4-EN7	Reductions in energy requirements of products and services		<p>Annual Report - Client deals, p44</p> <p>Website: - Commercial Real Estate Policy, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/</p> <p>NIBC promotes energy efficiency with its corporate and retail clients. Our Commercial Real Estate clients are encouraged to achieve the latest energy efficiency standards using best available technologies. For Retail Customers, NIBC mortgages allow financing to the legal limits to encourage energy renovations when financing a mortgage. One example is the financing NIBC provided to REDC which is mentioned in our Annual Report.</p> <p>These initiatives aim to support national and international efforts to reduce energy consumption related to real estate.</p>	8	   
GRI 303, Water						
303-1	G4-EN8	Water withdrawal by source		<p>Website - Sustainability Report (published April) nibc.com/sustainability</p> <p>Each of NIBC's offices is connected to local municipal water mains. Total usage for each location is reported in our sustainability supplement. For The Hague, the figures include commercial tenants of NIBC's offices as well as NGOs operating at NIBC's NGO Boulevard.</p>	8	  
303-2	G4-EN9	Water sources significantly affected by withdrawal of water		<p>In its operations, NIBC uses local municipal water supplies. No water sources are significantly affected by withdrawal of water due to NIBC's operations.</p>	8	  

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
GRI 304, Biodiversity						
304-1	G4-EN11	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		NIBC's own operations are not located in close proximity to protected areas and areas of high biodiversity value.	8	  
304-2	G4-EN12	Significant impacts of activities, products, and services on biodiversity		<p>Annual Report - Environment and natural capital, p57</p> <p>There were no known negative impacts on biodiversity from NIBC's own operations and no significant negative impacts on biodiversity reported for NIBC's financings and investments during 2017.</p> <p>NIBC screens potential clients and financings for biodiversity risks as part of its client and transaction due diligence processes.</p>	8	  
304-3	G4-EN13	Habitats protected or restored		<p>Annual Report - Environment and natural capital, p57-58</p> <p>Website: - Sustainability Policy, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/ - Environment Policy Supplement, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/</p> <p>NIBC performs sustainability due diligence for all clients and transactions in order to protect sensitive marine and land habitats and avoid harmful biodiversity impacts.</p>	8	  





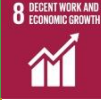

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
304-4	G4-EN14	IUCN Red List species and national conservation list species with habitats in areas affected by operations		<p>Annual Report - Environment and natural capital, p57-58</p> <p>Website: - Sustainability Policy, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/ - Environment Policy Supplement, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/</p> <p>There were no negative impacts reported from NIBC's own operations or as related to our financings on IUCN Red List species, national conservation list species or sensitive habitats during 2017. Furthermore there have been no negative biodiversity impacts reported to NIBC in regard to its financings and investments during 2017.</p> <p>By policy, NIBC performs due diligence in regard to new corporate clients and transactions to avoid potential negative impacts on IUCN Red List species, national conservation list species and sensitive land or marine habitats.</p>	8	  
GRI 305, Emissions						
305-1	G4-EN15	Direct (Scope 1) GHG emissions		<p>Website - Sustainability Report (published April) nibc.com/sustainability</p>	8	 
305-2	G4-EN16	Energy indirect (Scope 2) GHG emissions		<p>Website - Sustainability Report (published April) nibc.com/sustainability</p>	8	 
305-3	G4-EN17	Other indirect (Scope 3) GHG emissions		<p>Website - Sustainability Report (published April) nibc.com/sustainability</p>	8	 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
						
305-4	G4-EN18	GHG emissions intensity		Website - Sustainability Report (published April) nibc.com/sustainability	8	  
305-5	G4-EN19	Reduction of GHG emissions		Annual Report - Trends, p15 - Trends, p37 - Environment and natural capital, p57-58 Website - Sustainability Report (published April) nibc.com/sustainability <p>In our financings and investments, we recognise that we are involved in certain high emission sectors. our Offshore Energy sector (previously known as the Oil & Gas Services sector) has redirected its strategy to actively enable our clients in their transition towards clean energy.</p> <p>Of course, the energy transition also has an impact on our Shipping & Intermodal sector, which is going through a transformation as well. Together with two other Dutch banks, NIBC has been among the first banks in Europe to set more strict standards for ship financing by drawing up the Responsible Ship Recycling Standards (RSRS).</p> <p>In our own operations, NIBC continues to work to reduce its direct GHG impact through its environmental management program. Since 2010, we have measured our direct emissions, realised substantial</p>	8	  




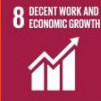






GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>reductions and compensated for any remaining direct emissions. 100% of electricity powering NIBC's facilities is sourced from renewable energy. We manage our direct impact on the environment through an environmental sustainability programme. NIBC Markets was integrated into this program during 2017.</p>		
GRI 307, Environmental Compliance						
307-I	G4-EN29	Non-compliance with environmental laws and regulations		<p>Annual report - Key figures, p8-9 - Environment and natural capital, p57-58</p> <p>No incidents of non-compliance with environmental or other laws and regulations were reported for 2017. Further, during 2017, no severe environmental incidents related to NIBC's financings, own operations or supply chain were reported.</p> <p>We recognise that this is a risk in our financings and investments. Therefore we mitigate this risk through stakeholder engagement, client and transaction due diligence, supplier due diligence and by raising awareness.</p>	7, 8	   
GRI 308, Supplier Environmental Assessment						


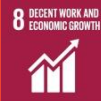


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
308-1	G4-EN32	New suppliers that were screened using environmental criteria		<p>Annual Report - How we manage sustainability, p56-58</p> <p>Website - Sustainability Report (published April) nibc.com/sustainability - General purchasing and invoicing conditions nibc.com/about-us/corporate-governance/</p> <p>NIBC screens new and existing suppliers against sustainability / ESG criteria using its internal know your supplier ("KYS") procedure.</p>	7, 8	  
308-2	G4-EN33	Negative environmental impacts in the supply chain and actions taken		<p>Annual Report - How we manage sustainability, p56-58</p> <p>NIBC screens clients and suppliers against sustainability (human rights, environmental, and governance) criteria using its sustainability internal know your supplier ("KYS") processes and procedure.</p> <p>No severe negative environmental impacts or incidents were reported regarding NIBC's supply chain during 2017. Potential suppliers which did not meet the sustainability criteria mentioned in NIBC's purchase conditions were rejected during our procurement process.</p> <p>No severe negative environmental impacts or incidents were reported related to supply chains of clients financed by NIBC during 2017. NIBC recognises that despite the fact that management systems, due diligence and monitoring systems are in place, negative environmental impacts may exist, but likely are at lower tiers within supply chains than are currently reported. Therefore we remain alert and continue to work with our clients and suppliers to apply best available practices to increase awareness, improve reporting, and influence better practices.</p>	7, 8	  
GRI 401, Employment						

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
401-1	G4-LA1	New employee hires and employee turnover		<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p4-7 - Key Figures, p8-9 - Recruitment, p52-53 <p>Sustainability Report (published April) https://www.nibc.com/about-nibc/sustainability/</p>		 
401-2	G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees		<p>None reported.</p> <p>By policy employees receive written confirmation of any changes in their individual compensation and benefits.</p>		 
401-3	G4-LA3	Parental leave		<p>All employees are entitled to parental leave. This right is described in NIBC's internal <i>Staff Manual</i>.</p> <p>NIBC complies with the statutory requirements for parental leave in each of its operating locations.</p> <p>By policy, all changes in the Manual, with the exception of those resulting from changes in legislation, must be approved by the Employees' Council, with account being taken of the provisions of Article 27 A through L of the <i>Works Councils Act</i> [Wet op de Ondernemingsraden].</p>		 
GRI 402, Labor/Management Relations						
402-1	G4-LA4	Minimum notice periods regarding operational changes		<p>Annual Report</p> <p>Health and Safety, p54</p> <p>Works Council, p54-55</p> <p>NIBC complies with the statutory requirements for operational changes in each of its operating locations.</p>		
GRI 403, Occupational Health & Safety						

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
403-1	G4-LA5	Workers representation in formal joint management-worker health and safety committees		<p>Annual Report Health and Safety, p54 Works Council, p54-55</p> <p>All workers are represented in formal joint management-worker discussions on health and safety by the NIBC Works Council.</p> <p>Further, In 2017, we successfully executed the recommendations of the 2016 Risk Assessment and Evaluation of our working conditions. This assessment, conducted by a certified third party, concluded that NIBC is generally well in control regarding safety, health and well-being.</p>	3	 
403-2	G4-LA6	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities		<p>Annual Report - Key Figures, p8-10 - Employee base, p51</p> <p>In 2017, the absentee rate reduced to 2.2% with an intensity of .1. This is a decrease from 2016 when an absentee rate of 2.4% was reported.</p> <p>No work-related fatalities severe onsite injuries, or occupational diseases were reported during 2017.</p>		 
403-3	G4-LA7	Workers with high incidence or high risk of diseases related to their occupation		None reported.		  
403-4	G4-LA8	Health and safety topics covered in formal agreements with trade unions		<p>Annual Report - Works Council, p54-55</p> <p>Health and safety topics are covered in formal agreements. These are collectively bargained on behalf of workers with management by NIBC's Employee Council.</p>	3	 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
						
GRI 404, Training and Education						
404-1	G4-LA9	Average hours of training per year per employee		Annual Report - Key Figures, p8-10 - Our People, p50-55 Partially reported. NIBC reports the average training expense per employee, but not the average number of hours per employee. In 2017, the average training expense per employee was EUR 2318, an increase from EUR 2041 reported in 2016. This figure adheres to the GRI definition and excludes on-site coaching by supervisors. We expect training expenses will rise once again in 2018, since all employees have been offered an additional individual development budget of EUR 2000 in addition to existing training programs and benefits. The new benefit was successfully negotiated on behalf of employees in Q4 2017 by the employee representative body, NIBC's Employee Council. The objective of the additional budget is to give employees freedom about their development and the ability to personally decide what is helpful for them. The additional budget does not have to be focused on an employee's current job or role.		
404-2	G4-LA10	Programs for upgrading employee skills and transition assistance programs		Annual Report - Our People, p50-55 Internal and 3rd party training programs across a wide range of skills and interests are offered to employees by NIBC as part of the "NIBC Academy" initiative. Every employee is offered an annual training budget which may be used for upgrading employee skills related to their job and professional development plan. For 2018-19, every employee has also been offered an additional		 






GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				personal development budget. This program is designed to give employees flexibility to enhance their skills in any area of interest, potentially boosting employability. Employability is one of the material aspects revealed during stakeholder interviews supporting NIBC's 2017 materiality analysis,		
404-3	G4-LA11	Percentage of employees receiving regular performance and career development reviews		<p>Annual Report - Our People, p50-55</p> <p>All employees receive annual performance and career development reviews, except employees who joined shortly before the review process commences, or who will leave the company during the process.</p>		 
GRI 405, Diversity and Equal Opportunity						
405-1	G4-LA12	Diversity of governance bodies and employees		<p>Annual Report: Report of the Supervisory Board, p71-84 Corporate Governance, p85-88</p> <p>At year end 2017, NIBC's Executive Committee was 33% female, 77% male. The ratio for all senior management was 12% female, 88% male for 2017, which compares to 9% female and 91% male in 2016.</p>	6	   
405-2	G4-LA13	Ratio of basic salary and remuneration of women to men		<p>Overall basic salary by level: Professional Support 0.92; Analyst 0.99, Associate 1.04, Vice President 1.19, Associate Director 1.10, Director 1.10, Managing Director 0.77.</p> <p>This calculation follows the GRI definition of basic salary and remuneration of women to men for each employee category, NIBC monitors salary levels by gender to ensure fairness by level and responsibility.</p>	6	   

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
GRI 406, Non-discrimination						
406-I	G4-HR3	Incidents of discrimination and corrective actions taken		<p>Website</p> <ul style="list-style-type: none"> - NIBC Code of Conduct, https://www.nibc.com/about-nibc/corporate-governance/ - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/ <p>By policy, any incidents may be reported to a defined “trusted representative”. We have a transparent culture in which staff members can raise genuine concerns without fear of reprisal.</p> <p>Staff members reporting an abuse in good faith can be confident that they receive protection against unfair treatment, that confidentiality will be honored, that a reported abuse will be investigated fairly and that, if deemed necessary, NIBC will take appropriate action. All staff received an updated training on this during 2017.</p>	1, 2, 6	   
GRI 407, Freedom of Association and Collective Bargaining						


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
407-I	G4-HR4	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		<p>Website: - Human Rights Policy Supplement, https://www.nibc.com/about-nibc/sustainability/sustainability-governance/</p> <p>No operations or suppliers were identified where these rights might be significantly at risk in NIBC's due diligence and monitoring during 2017.</p> <p>NIBC's policies clearly support the right to freedom of association and collective bargaining in our own operations, in our financings for clients, and for our suppliers. In financings we believe there are potential risks at the suppliers to the suppliers of our clients.</p> <p>Since NIBC's suppliers are located near our operations in Northwest Europe, the risk of this is low though NIBC will continue to be alert to this potential risk.</p>	3	  
GRI 408, Child Labour						
408-I	G4-HR5	Operations and suppliers at significant risk for incidents of child labor		<p>Website - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/</p> <p>Due to the nature of our business, since NIBC's suppliers are located near our operations in Northwest Europe and since local and national regulations are strong, significant risk is seen to be low though NIBC is alert to this potential risk.</p> <p>No operations or suppliers were identified to be significantly at risk in NIBC's due diligence and monitoring during 2017.</p> <p>NIBC's sustainability and procurement policies clearly protect the rights of children, respecting and protecting human rights in our own operations, in our financings for clients, and with our suppliers.</p>	5	 
GRI 409, Forced or compulsory Labour						




GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
409-I	G4-HR6	Operations and suppliers at significant risk for incidents of forced or compulsory labor		<p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/ <p>Due to the nature of our business, since NIBC's suppliers are located near our operations in Northwest Europe and since local and national regulations are strong, significant risks are seen to be low though NIBC is alert to these potential risks.</p> <p>No operations or suppliers were identified to be significantly at risk in NIBC's due diligence and monitoring during 2017.</p> <p>NIBC's sustainability and procurement policies clearly protect the rights of children, respecting and protecting human rights in our own operations, in our financings for clients, and with our suppliers.</p>	4	 
GRI 410, Security Practices						
410-I	G4-HR7	Security personnel trained in human rights policies or procedures		<p>The use of security personnel allows NIBC and our commercial and civil society organisation tenants to operate in a safe and productive manner.</p> <p>All NIBC facilities staff were trained in regard to NIBC's Code of Conduct and compliance policies during 2017.</p> <p>Security personnel contracted by NIBC have been trained in human rights policies and procedures according to our security provider's own policies.</p> <p>NIBC's security provider is also a signatory to UN Global Compact, and holds a number of third party certifications including ISO 26000, ISO 14001:2004, OHSAS 18001:2007</p>	1	
GRI 411, Rights of Indigenous Peoples						

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
411-I	G4-HR8	Incidents of violations involving rights of indigenous peoples		<p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/ <p>No incidents of violations involving rights of indigenous peoples were reported in 2017 as related to NIBC's financings, our operations or our supply chain.</p> <p>Due diligence was performed for this aspect as part of NIBC's integrated sustainability assessments of corporate clients and transactions and in our supplier due diligence process.</p>	1, 2	
GRI 412, Human Rights Assessment						
412-I	G4-HR9	Operations that have been subject to human rights reviews or impact assessments		<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p6-7 - Key Figures p8-10 - Non-financial reporting, p57-61 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/ <p>By policy, all new corporate clients, corporate financings and investments of NIBC were screened for potential material human rights impacts during 2017.</p> <p>NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" procedures and due diligence. NIBC's approach to Human Rights is elaborated in our Human Rights Policy Supplement which received modest revisions in 2017.</p>	1-10	



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
412-2	G4-HR2	Employee training on human rights policies or procedures		<p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/ <p>NIBC provides regular training on compliance and sustainability (including human rights) to its employees. Respect for human rights is embedded in NIBC's Code of Conduct, compliance and sustainability policies. A mandatory e-learning for 100% of NIBC staff was launched in Q4. Further, a mandatory workshop on whistleblowing was given to all staff during Q2/Q3. These trainings covered staff in all locations and business units of NIBC Holding.</p> <p>NIBC's approach to Human Rights for is further elaborated in our Human Rights Policy Supplement which received modest revisions in 2017.</p>	I-10	  
412-3	G4-HR1	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening		<p>Annual Report</p> <ul style="list-style-type: none"> - Key Figures, p8-9 - Non-financial reporting, p57-61 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ <p>By policy, all new corporate clients, corporate financings and investments of NIBC were screened for potential material human rights impacts during 2017. NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" (KYS) procedures and due diligence.</p>	I-10	 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
GRI 413, Local Communities						
413-1	G4-SO1	Operations with local community engagement, impact assessments, and development programs		<p>Annual Report:</p> <ul style="list-style-type: none"> - Non-financial reporting, p57-61 - Stakeholder Engagement, p61-67 <p>Website</p> <ul style="list-style-type: none"> - Sustainability initiatives nibc.com/sustainability/focus-areas/society/ <p>NIBC regularly engages with our local community in initiatives and development programs. This is guided by the interests and active engagement of NIBC's employees in supporting those who are most vulnerable in our communities through community development groups and civil society organisations.</p> <p>Examples from 2017 included joint initiatives with civil society organisations in NIBC's NGO Boulevard, collaborative initiatives in financial education during Week van het Geld / Global Money Week, a "Bank voor een bank" initiative with the Hague Food Bank, participation in Jeans for Genes, collection for victims of the Grenfell Tower (UK) fire tragedy, a holiday initiative for the children of Stichting Vitalis, and support for Kika, a dutch children's cancer charity.</p>		
413-2	G4-SO2	Operations with significant actual and potential negative impacts on local communities		<p>Annual Report</p> <ul style="list-style-type: none"> - Non-financial reporting, p57-61 <p>No significant actual and potential negative impacts of NIBC operations or financings/investments on local communities were reported for 2017.</p>		 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
GRI 414, Supplier Social Assessment						
414-1	G4-LA14, G4-HR10, G4-S09	New suppliers that were screened using social criteria		<p>Annual Report</p> <ul style="list-style-type: none"> - Key Figures, p8-9 - Non-financial reporting, p57-61 <p>Website</p> <ul style="list-style-type: none"> - Corporate Governance, nibc.com/about-us/corporate-governance/ - General purchasing and invoicing conditions, nibc.com/about-us/corporate-governance/ - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Sustainability supplement, nibc.com/sustainability/sustainability-governance/ <p>NIBC screens new and existing suppliers against sustainability (human rights, environmental, and governance) criteria using its internal know your supplier ("KYS") processes and procedure.</p>	1-10	
414-2	G4-LA15, G4-HR11, G4-SO10	Negative social impacts in the supply chain and actions taken		<p>Annual Report</p> <ul style="list-style-type: none"> - Non-financial reporting, p57-61 <p>NIBC screens clients and suppliers against sustainability (human rights, environmental, and governance) criteria using its internal sustainability and know your supplier ("KYS") processes and procedure.</p> <p>No severe negative social impacts (incl human rights) or incidents were reported regarding NIBC's supply chain during 2017. Potential suppliers which did not meet the sustainability criteria mentioned in NIBC's purchase conditions were rejected during our procurement process.</p> <p>No severe negative social impacts (incl human rights) or incidents were reported related to supply chains of clients financed by NIBC during 2017. Despite this, we believe that these risks exist. Therefore we remain alert and continue to work with our clients</p>	1, 2	


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				and suppliers to apply best available practices to increase awareness, improve reporting, and influence better practices.		
GRI 415, Public Policy						
415-I	G4-SO6	Political contributions		<p>EUR 0. NIBC made no direct political contributions during 2017.</p> <p>Beyond its participation in trade associations (GRI 102-13), NIBC does not employ or engage professional lobbyists or make any direct political contributions.</p>	10	 
GRI 416, Supplier Social Assessment 2017						
416-I	G4-PR1	Assessment of the health and safety impacts of product and service categories		<p>Annual Report</p> <ul style="list-style-type: none"> - Risk Policy & Compliance Committee, p77-78 - Operational Risk, p100 <p>Website</p> <ul style="list-style-type: none"> - Corporate Governance nibc.com/about-us/corporate-governance/ <p>NIBC assesses all new products and regularly reviews existing products as part of its internal NPAP (new products) and SCAP (reviews and refinements to existing products) procedures.</p> <p>These processes aim to help NIBC's business units to design and launch new products efficiently. This ensures that all issues are identified and addressed before launch and provides a clear roadmap for the design and implementation of a commercial opportunity. These processes are also legally required under regulations such as Mifid II, Wft, MaRisk, and KWG.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
416-2	G4-PR2	Incidents of non-compliance concerning the health and safety impacts of products and services		<p>Annual Report - Non-financial reporting, p57-61</p> <p>During 2017, no incidents of non-compliance concerning the health and safety impacts of products and services were reported.</p>		 
GRI 417, Marketing & Labeling						
417-1	G4-PR3	Requirements for product and service information and labeling		<p>NIBC adheres to all applicable rules and regulations for product information in the geographies where our products are marketed. Further, NIBC in its "Know Your Client" (KYC) processes makes further determinations according to MIFID. In the Netherlands, is implemented in the Dutch Financial Supervision Act (Wet op het financieel toezicht: Wft).</p> <p>For our NIBC Direct retail offerings, such as online saving accounts, consumer mortgages, and a buy-to-let mortgages, all terms and conditions are written in plain language and avoid small print.</p>		
417-2	G4-PR4	Incidents of non-compliance concerning product and service information and labeling		No incidents of non-compliance concerning product and service information and labeling were reported in 2017.		
417-3	G4-PR7	Incidents of non-compliance concerning marketing communications		No significant incidents of non-compliance concerning marketing communications were reported in 2017.		
GRI 418, Customer Privacy						
418-1	G4-PR8	Substantiated complaints concerning breaches of customer privacy and losses of customer data		<p>Annual Report - Client privacy & data security, p59</p> <p>During 2017, there were no reportable leaks, thefts, or losses of customer data nor any complaints regarding breaches of customer</p>		






GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>privacy and losses of customer data.</p> <p>NIBC defines significant breaches as those which we would be required to report to an authority or regulator. During 2017, attention by regulators to the potential for data breaches has increased significantly.</p> <p>NIBC continues to take steps to strengthen data security and risk management practices. This includes training to ensure increased awareness of information security, data privacy, operational risk and legal risk.</p>		
GRI 419, Socioeconomic Compliance						
419-1	G4-SO8	Non-compliance with laws and regulations in the social and economic area		<p>Annual Report - Key Figures, p8-9</p> <p>One significant fine was incurred during 2017. NIBC defines significant fines to be those exceeding ten thousand euros received from a regulator or authority (see definitions on p305 of our Annual Report). No other significant non-monetary sanctions were reported.</p>		 

Additional Disclosures

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS1	Policies with specific environmental and social components applied to business lines.		<p>Annual Report - Sustainability, p55-61</p> <p>Website: Corporate Governance, https://www.nibc.com/about-us/corporate-governance/ Sustainability Governance, https://www.nibc.com/sustainability/sustainability-governance/</p> <p>Environmental and social standards that apply to our corporate clients are described in our Sustainability Framework.</p>		
	GRI-FS2	Procedures for assessing and screening environmental and social risks in business lines.		<p>Annual Report - Sustainability, p55-61</p> <p>Website: Sustainability Governance, https://www.nibc.com/sustainability/sustainability-governance/</p> <p>Our procedures for managing environmental & social risks are described in our Sustainability Policy Framework and Approach.</p>		
	GRI-FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements of transactions.		<p>Annual Report - Sustainability, p55-61</p> <p>Website: Sustainability Governance, https://www.nibc.com/sustainability/sustainability-governance/</p> <p>Our processes for monitoring client's implementation of and compliance with environmental and social compliance are described in our Sustainability Policy Framework and Approach.</p>		 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures.		<p>Annual Report - Sustainability, p55-61</p> <p>Website: Sustainability Governance, https://www.nibc.com/sustainability/sustainability-governance/</p> <p>During 2017, NIBC undertook mandatory trainings, workshops and e-learning for all staff in regard to our updated Code of Conduct, compliance and whistleblowing policies.</p> <p>A general sustainability training is offered to new employees annually, or more frequently depending on inflow of employees. The training provides insight in sustainability issues, environmental and social impacts of businesses, the response of the financial industry, and NIBC's approach to sustainability. The training offers general information and uses a case-study to get insight in NIBC's Sustainability Policy Framework and Toolkit applicable in our client business.</p> <p>Training on sustainability trends and developments are offered on a regular basis. Topical workshops which focus on specific issues and/or sectors are also held frequently and help to keep staff up to date on new findings, new solutions, and areas of stakeholder concern.</p> <p>On an ongoing basis, team meetings are visited by the experts of NIBC's Sustainability team for general or specific sustainability presentations/ discussions.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS5	Interactions with clients/ investors/ business partners regarding environmental and social risks and opportunities.		<p>Annual Report Key Figures, p8-9 Stakeholder Engagement, p61-67</p> <p>Website - Sustainability Report (published April) nbc.com/sustainability</p> <p>By policy, all corporate clients and transactions (100%) are subject to sustainability screening. In cases where elevated risks have been identified, NIBC reports this total as part of our non-financial key figures and has interacted with our clients in regard to these risks.</p> <p>Topics discussed with clients, investor or business partners during 2017 included reducing greenhouse gas emissions, fair taxation, improving responsible sourcing, addressing human rights in supply chains, eliminating modern slavery in supply chains, financial education and financial inclusion, and developing circular business models to increase reuse of materials and reduce waste.</p> <p>Further, in the shipping & intermodal sector during 2017, we interacted with ship owners for all financings and potential financings by NIBC as per our best efforts commitments under the Responsible Ship Recycling Standards (RSRS).</p>		
	GRI-FS6	Percentage of the portfolio for business lines by specific region, size and by sector.		<p>Annual Report At a Glance, p4-7 Corporate Clients, p35-44 Retail Clients, p44-49</p> <p>Website - Sustainability Report (published April) nbc.com/sustainability</p> <p>Detailed figures are stated throughout our annual report, pillar III report and in our NACE supplement. Interim figures are available in investor presentations on our corporate website.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.		<p>Website:</p> <ul style="list-style-type: none"> - Renewable Energy, NIBC NACE Supplement annualreport2017.nibc.com/ - Sustainability Report (published April) nibc.com/sustainability <p>In addition to renewable energy, NIBC also supports organic & responsible food and agri. sustainable shipping, responsible Infrastructure, and sustainable commercial real estate financings and investments. However these are not yet shown in monetary value or as a percentage of the portfolio in our reporting.</p>		   
	GRI-FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures		<p>Annual Report Corporate Responsibility reporting scope, p313-314</p> <p>Internal audits are performed on key figures and the underlying environmental and social (sustainability) risk processes. For 2017, no external 3rd party audit was performed. The internal audit revealed no significant exceptions.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues.		<p>Annual Report - Key Figures, p8-9</p> <p>Partially reported. By policy, all corporate clients and transactions (100%) are subject to sustainability screening, NIBC also reports the number of higher sustainability risk transactions the bank has considered during the year as a non financial key figure.</p> <p>However we do not report the overall number of companies or the percentage where further interaction has taken place.</p> <p>In cases where potential issues are identified, NIBC interacts with clients to mitigate or avoid harm. For certain sectors, additional measures are implemented. For example, for potential financings in the shipping sector, we interact on environmental and social issues with clients of all potential financings as per our commitments under the Responsible Ship Recycling Standards (RSRS).</p>		
	GRI-FS11	Percentage of assets subject to positive and negative environmental or social screening.		<p>Annual Report - Key Figures, p8-9</p> <p>Website - Sustainability Report (published April) nibc.com/sustainability</p> <p>By policy, all corporate clients and transactions (100%) are subject to sustainability screening.</p>		
	GRI-FS15	Policies for the fair design and sale of financial products and services		<p>Annual Report - Risk Policy & Compliance Committee, p 78-79</p> <p>Website - Sustainability Report (published April) nibc.com/sustainability</p> <p>All new products are required by policy to go through NIBC's new products approval procedure (NPAP). Changes to existing products are required to go through NIBC's product change procedure</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
				(SCAP). These operational control processes include checks to ensure fairness to clients (duty of care) and that sustainability aspects (environment, social, governance) are well-considered.		
	GRI-FS16	Initiatives to enhance financial literacy by type of beneficiary		<p>Annual Report Supporting vulnerable clients, p59 Innovation Lab, p 60-61 Stakeholder engagement, Society at Large, p66</p> <p>Website - Sustainability Report (published April) nibc.com/sustainability</p> <p>NIBC and its employees are involved in initiative to enhance financial literacy of children, participating annually in Global Money Week/Week van het Geld. During 2017, approximately 700 students participated in money lessons led by an NIBC employee.</p> <p>NIBC employees also mentor young entrepreneurs as part of initiatives related to NIBC's Innovation Lab.</p> <p>For retail clients, NIBC offers financial counseling for clients which are in arrears. This is provided using third party services and is tailored to each client.</p>		