

2019 NIBC GRI CONTENT INDEX

March 2020

About this report

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

This report has been prepared in accordance with the GRI Standards: Core option. For increased transparency, we have also provided most disclosures which are only required at the Comprehensive level of GRI. The elements reported are linked and aligned by GRI to other important initiatives like CDP's environmental reporting system, SASB and UN PRI.

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 increased clarity, we provide direct descriptive responses for many indicators in addition to page references for our Annual Report and links to other publications. We have also provided responses for each indicator 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.

Every effort has been made to provide complete and clear information in this report. For clarity, any references to our Annual Report refer to appropriate pages and sections within the 2019 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	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
102-1	Name of the organization	Core	NIBC Holding N.V.
102-2	Activities, brands, products, and services	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p5-7 - Letter from the CEO, p15-16 - Report of the Managing Board, p22-25 <p>Brands include NIBC Bank, NIBC Direct, OIMIO, Lot Hypotheken, Lendex and Beequip.</p> <p>An aspect which differentiates NIBC from many universal banks is that NIBC's business model does not provide for current accounts.</p>
102-3	Location of headquarters	Core	The Hague, Netherlands
102-4	Location of operations	Core	<p>Annual Report,</p> <ul style="list-style-type: none"> - At a glance, p6 <p>NIBC has operations in the Netherlands, Germany, the United Kingdom, and Belgium. An aspect which differentiates NIBC from many brick and mortar universal banks is that NIBC does not have physical retail offices.</p>
102-5	Ownership and legal form	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - About NIBC, p22 - Report of the Managing Board, p100-101 <p>NIBC Holding is publicly listed at Euronext, under the ticker NIBC.AS. NIBC Bank is the most significant asset.</p> <p>On 25 February 2020, NIBC Holding N.V. and The Blackstone Group International Partners LLP (together with its affiliates, as the context requires, 'Blackstone') announced that an entity owned by Blackstone, have reached a conditional agreement on a recommended all-cash public offer for all issued and outstanding shares in the capital of NIBC Holding N.V., not held by J.C. Flowers & Co (JCF) and Reggeborgh Invest B.V. (Reggeborgh) at an offer price of EUR 9.85 (cum dividend) per share in cash.</p> <p>NIBC's legal form is N.V. ("Naamloze Vennootschap"), a type of public company which is the common form for corporates in the Netherlands.</p>
102-6	Markets served	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p6 - Report of the Managing Board, p44,50 <p>NIBC's focus is on markets in north-western Europe.</p>
102-7	Scale of the organization	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p5-7 - Key Figures, p12-14

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
102-8	Information on employees and other workers	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p5-7 - Key Figures, p14 - Our People, p74-82 <p>Website</p> <ul style="list-style-type: none"> - Sustainability (nibc.com/about-nibc/sustainability/) <p>Our 2019 Sustainability Report on our corporate website provides additional details on our employees and other workers.</p>
102-9	Supply chain	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Our place in the financial ecosystem, p22-23 - NIBC's Value chain, p94-96 - Business Partners, p96 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) - Our Value Chain (nibc.com/about-nibc/sustainability/our-value-chain/) <p>NIBC's supply chain consists 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 Examples are provided throughout our Annual Report.</p>
102-10	Significant changes to the organization and its supply chain	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - Letter from the CEO, p15-17 - Report of the Managing Board, p22, 24-25 - NIBC's Value Chain, p94-96
102-11	Precautionary Principle or approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Risk Management, p55-73 - Sustainability p87-89 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance (nibc.com/about-nibc/corporate-governance/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) <p>NIBC applies the Precautionary Principle through its risk management and compliance approach toward potential environmental and social risks and impacts. 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 assessed for their social (incl human rights) and environmental impact as part of NIBC's new product (NPARP) and significant change (SCAP) procedures, approval and review processes.</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
102-12	External initiatives	Core	<p>Annual Report - Sustainability, p85-97</p> <p>Website: - Corporate Governance (nibc.com/about-nibc/corporate-governance/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>Externally-developed economic, environmental and social charters, principles, and other initiatives which NIBC endorses and applies include:</p> <p>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) PCAF Partnership for Carbon Accounting Financials (signatory)</p> <p>Additional external principles and charters applied by NIBC are stated in our corporate governance, compliance and sustainability policies.</p>
102-13	Membership of associations	Core	<p>NIBC is a member of the Dutch Banking Association (NVB) and Dutch Association of Covered Bond Issuers (DACB).</p> <p>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). Around 40 NIBC employees are members of committees or expert pools at these associations.</p>
102-14	Statement from senior decision-maker	Core	<p>Annual Report, - Letter from the CEO, p15-17</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
102-15	Key impacts, risks, and opportunities		<p>Annual Report, - SWOT analysis, p100 - Risk Management, p55-73 - Sustainability, p85-97</p> <p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>The key impacts, risks and opportunities are mentioned in our Annual Report. NIBC supports its clients to achieve their transition towards more sustainable business. To further this, we developed new sustainable products during 2019, including Lot Hypotheken, a new sustainable mortgage offering. The main salient human rights risks for NIBC are labour conditions and worker safety in corporate client supply chains. The main long-term climate risks for NIBC are likely physical risks related to flooding and drought due to rising global temperatures.</p>
102-16	Values, principles, standards, and norms of behavior	Core	<p>Annual Report, - At a glance, p5-7 - CEO Letter, p15-17 - Vision & Strategy, p22-25 - Banking on Trust, p78</p> <p>Website, - Vision and Principles (nibc.com/about-nibc/vision-and-principles/) - Code of Conduct, (nibc.com/about-nibc/corporate-governance/)</p> <p>During 2019, all employees received training on NIBC's Code of Conduct and other key compliance topics. The Code was fully revised and relaunched in 2017 after a full review.</p> <p>As part of their employment contract, each staff member has agreed to adhere to the NIBC code of conduct. Dutch staff sign the Bankers Oath, which is also displayed prominently in NIBC's offices in the Hague and Amsterdam. Training on NIBCs 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	Mechanisms for advice and concerns about ethics		<p>Annual Report - Sustainability, p93 - Complaints, p357</p> <p>Website: - Grievances and complaints (nibc.com/about-nibc/contact-nibc/complaints-form/)</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<ul style="list-style-type: none"> - Code of Conduct (nibc.com/about-nibc/corporate-governance/) - Whistleblowing (nibc.com/about-nibc/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. By law (HvK Act), all Dutch-based businesses larger than 50 employees must have a notification procedure in place which makes it possible to report any suspicion of misconduct.</p> <p>NIBC's whistleblowing policy was updated during 2019. By policy, requests for advice or concern are treated confidentially by designated trust persons. This mechanism also can be used anonymously. Our complaints policy was updated in 2019, ensuring our approach continues to follow best practices.</p> <p>During 2019, NIBC updated its complaints procedure and continued its participation 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 continue to inform refinements to our approach in this area.</p>
102-18	Governance structure	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Report of the Supervisory Board, p105-117 - Corporate Governance, p118-122 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance (nibc.com/about-nibc/corporate-governance/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) <p>NIBC maintains a two-tier board structure consisting of a Managing Board and a Supervisory Board. The Managing Board is responsible for the day-to-day management, which includes, among other things, formulating NIBC's strategy, policies and setting and achieving NIBC's objectives. The Supervisory Board supervises and advises the Managing Board.</p>
102-19	Delegating authority		<p>Annual Report:</p> <ul style="list-style-type: none"> - Report of the Supervisory Board, p105-117 - Corporate Governance, p118-122 - Sustainability p85-97 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance (nibc.com/about-nibc/corporate-governance/)

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>- Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <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>
102-20	Executive-level responsibility for economic, environmental, and social topics		<p>Annual Report</p> <ul style="list-style-type: none"> - Sustainability p85-97 - Long-term value creation, p102 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance (nibc.com/about-nibc/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>This responsibility is publicly transparent. For example, our CEO signed the Climate Agreement of the Dutch financial sector on behalf of NIBC. NIBC's Chief Risk Officer signs NIBC's Modern Slavery Statement each year on behalf of our Executive Committee.</p>
102-21	Consulting stakeholders on economic, environmental, and social topics		<p>Annual Report:</p> <ul style="list-style-type: none"> - Sustainability p85-97 - Long-term value creation, p102 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Stakeholders: (nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/) <p>The wide range of discussion topics included financial issues as well as non-financial dilemmas and concerns. We held one-on-one meetings with individual stakeholders, received and responded to customer queries, participated in stakeholder events, conducted employee surveys, discussed evolving societal issues with civil society organisations, held briefings with analysts, hosted capital markets days for shareholders, engaged with rating agencies, and held formal and informal discussions with employees.</p>

GRI	Disclosure Title	Core	NIBC Disclosure
(specific annual report page references refer to the NIBC Holding NV annual report)			
102-29	Identifying and managing economic, environmental, and social impacts	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - Risk Management, p55-73 - Sustainability, p88-90 - Stakeholder engagement, p90-93 <p>Website</p> <ul style="list-style-type: none"> - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Sustainability Governance (nibc.com/about-nibc/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>NIBC has appropriate processes in place to identify and manage economic, environmental, and social risks and impacts. Stakeholders are regularly consulted to identify and prioritize the issues which are most material and the potential material and salient impacts, risks, and opportunities.</p>
102-30	Effectiveness of risk management processes	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - At a Glance, p5-7 - Key Figures, p12-14 - Climate Risk, p60-61 - Risks and Outcomes, p88-89 - Performance, p90 <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 2019, no severe environmental incidents related to NIBC's financings, own operations or supply chain were reported. We mitigate potential environmental and biodiversity risks through client and transaction due diligence, stakeholder engagement and by supporting companies in their transition toward more responsible business. For example, NIBC's Commercial Real Estate team is supporting entrepreneurial companies which develop near 'energy neutral' buildings (Bijna Energie Neutral Gebouw, 'BENG'), pushing further innovation in building efficiency. This approach also contributes to national and European objectives to increase building resource efficiency in line with commitments under the Paris Climate Agreement.</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>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
102-31	Review of economic, environmental, and social topics		<p>Annual Report</p> <ul style="list-style-type: none"> - How we manage sustainability, p87-90 - Stakeholder engagement and materiality, p90-94 <p>Website</p> <ul style="list-style-type: none"> - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) - Sustainability Report (nibc.com/about-nibc/sustainability/) <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	Highest governance body's role in Sustainability Reporting		<p>Annual Report</p> <ul style="list-style-type: none"> - How we manage sustainability, p87-90 - Corporate responsibility reporting scope, p366-367 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) - Sustainability Report (nibc.com/about-nibc/sustainability/) <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>
102-33	Communicating critical concerns		<p>Annual Report</p> <ul style="list-style-type: none"> - How we manage sustainability, p87-90 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) - Sustainability Report (nibc.com/about-nibc/sustainability/) <p>Concerns are communicated in a variety ways depending on the nature, materiality and severity of the concerns. This includes direct discussions</p>

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			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.
102-34	Nature and total number of critical concerns		<p>Annual Report: - Performance, p90</p> <p>No severe adverse human rights incidents related to NIBC’s financings, own operations, and supply chain were reported in 2019. The main salient human rights risks for NIBC are labour conditions and worker safety in corporate client supply chains. NIBC manages these risks through stakeholder engagement, client and transaction due diligence and by raising awareness with corporate clients. Full transparency into supply chains is an ongoing challenge for mid-market corporate businesses but is gradually improving.</p> <p>During 2019, no severe adverse environmental incidents related to NIBC’s financings, own operations or supply chain were reported. At the same time, we recognise that physical and transitional climate risks are present and impacts will continue to become more visible in future years.</p>
102-35	Remuneration policies		<p>Annual Report, - Remuneration report, p124-129</p> <p>Website - Corporate Governance (nibc.com/about-nibc/corporate-governance/) - Compliance with Banking Code, p6 (nibc.com/about-nibc/corporate-governance/governance-codes/)</p> <p>The Supervisory Board reviewed and amended NIBC’s remuneration policy in 2019. The review took into account all relevant laws, regulations and guidelines: the Dutch Corporate Governance Code; the Dutch Banking Code; the DNB Principles on Sound Remuneration Policies (DNB principles), EBA Guidelines on Sound Remuneration; and CRD IV and the Dutch remuneration legislation for financial services companies (Wet belongingsbeleid financiële onderneming, Wbfo).</p> <p>NIBC’s remuneration policy is sustainable, balanced and in line with our chosen strategy and risk appetite. It revolves around these five key principles: remuneration is (i) aligned with NIBC’s business strategy and risk appetite; (ii) appropriately balanced between short and long term; (iii) differentiated and linked to the achievement of performance objectives and the results of NIBC; (iv) externally competitive and internally fair; and (v) managed in an integrated manner that takes into account total compensation.</p> <p>According to the remuneration policy, the variable income component in 2019 for the Managing Board is set at 15% of base salary at target</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>achievement with a maximum of 20% of the base salary. Based on the medium-term objectives specific targets were set: financial targets 25% (profit, operating income, expenses and impairments), business growth 25% (net growth and growth agenda), Franchise People & Clients 15% (engagement, and NPS), Operational Control 25% (client integrity) and personal target 10% (e.g. governance and stakeholder management).</p>
102-36	Process for determining remuneration		<p>Annual Report, - Remuneration report, p124-129</p> <p>Website - Corporate Governance (nibc.com/about-nibc/corporate-governance/supervisory-board/) - Compliance with Banking Code, p6 (nibc.com/about-nibc/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>In order to determine appropriate market levels of remuneration for the Managing Board, the Supervisory Board has identified a hybrid benchmark peer group, consisting of all AEX and AMX (both Euronext) listed companies. Given the specific circumstances and legislation for the (Dutch) financial institutions, more specifically for banks, the Supervisory Board decided to also use a benchmark of the Dutch banks. The composition of these peer groups reflects the labour market in which NIBC competes for talent. As such, it is an objective measure not based on individual data points selected by NIBC.</p> <p>Throughout the cycle, total compensation for the CEO and members of the Managing Board is targeted just below the median of their peers in the peer group, based on benchmark data provided by external independent compensation consultants and publicly available information. The positioning just below the median of the peer group is in line with the Dutch Banking Code.</p> <p>All employees with a function contract have a pre-agreed set of financial and non-financial (at least 50%) performance targets. Their performance assessments take into account the achievement of preagreed targets, how they have behaved according to NIBC's corporate values, 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>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
102-37	Stakeholders' involvement in remuneration		<p>Annual Report, - Remuneration report, p124-129</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 risk, etc.</p> <p>For example, in 2018, in the preparation for the Initial Public Offering (IPO) various stakeholders (potential investors, selling shareholder who also remained a shareholder, supervisory board, but also e.g. regulators) deemed retention of the Executive Committee necessary, as the stakeholders would like to ensure stability at the highest level before, during and after the IPO. The retention package was designed in such a way that those interests are safeguarded and in line with applicable legislation and regulations. In the context of the IPO the De Nederlandsche Bank (DNB) has given its consent to the award of the retention package within the meaning of article 1:122 of the FMSA and in accordance with the procedure of article 94 (1)(g) under (ii) of CRD IV. Shareholders of NIBC approved the retention package. The retention package consisted of two parts, the first (60%) subject to continued employment until the date of the IPO (23 March 2018) and the second (40%) subject to continued employment until the first anniversary of the IPO (23 March 2019). Both parts are subject to the rules on deferral and retention (lock-up period).</p>
102-38	Annual total compensation ratio		<p>Annual Report, - Remuneration report, p127-128</p> <p>In line with the Dutch Corporate Governance Code, NIBC publicly discloses relevant elements related to the internal pay ratios.</p> <p>In 2019, the base salary pay ratio of the CEO (EUR 845,788) compared to the base salary of a member of the Managing Board (EUR 615,060) was 1.4. In 2019, the base salary pay ratio of the CEO and the Managing Board members (EUR 691,969) compared to the base salary of the non-statutory members of the Executive committee (EUR 350,000) was 2.0. In 2019, the base salary pay ratio of the CEO (EUR 845,788) compared to the median full-time base salary of all employees (EUR 74.000) was 11.4 (2018: 10.6).</p>
102-39	Percentage increase in annual total		<p>Annual Report, - Remuneration report, p127-128 - Remuneration expenses, p288-292</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
	compensation ratio		In line with the Dutch Corporate Governance Code, NIBC discloses the relevant elements related to the internal pay ratios. In 2019, the base salary pay ratio of the CEO (EUR 845,788) compared to the median full-time base salary of all employees (EUR 74.000) was 11.4 (2018: 10.6).
102-40	List of stakeholder groups	Core	<p>Annual Report: - Stakeholder engagement and materiality, p90-94</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Stakeholders: (nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/)</p> <p>We define stakeholders as any group or individual affected directly or indirectly by our activities. We have identified our main stakeholders to include clients, institutional investors, shareholders, regulators, employees and civil society organisations. We actively seek these connections to the world around us to ensure we reflect on our business, understand our impact and to continue to innovate .</p>
102-41	Collective bargaining agreements	Core	<p>Annual Report: - Works Council, p80</p> <p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>100% of NIBC's employees are represented in formal discussions with management by our main representative body, the NIBC Works Council. The Works Council formally represents Dutch employees, but its agreements also benefit employees in other locations.</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.</p> <p>As mentioned in our Human Rights policy supplement, NIBC also supports the right of workers to collective bargaining in our financings and investments and with suppliers. We regularly engage with representatives of international labor unions to discuss developments.</p>
102-42	Identifying and selecting stakeholders	Core	<p>Annual Report: - Stakeholder engagement and materiality, p90-94</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Stakeholders: (nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/)</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>chain/stakeholders/)</p> <p>We define stakeholders as any group or individual affected directly or indirectly by our activities.</p> <p>We have identified our main stakeholders to include clients, institutional investors, shareholders, regulators, employees and civil society organisations. We actively seek these connections to the world around us to ensure we reflect on our business, understand our impact and to continue to innovate .</p>
102-43	Approach to stakeholder engagement	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Stakeholder engagement and materiality, p90-94 - Examples of stakeholder engagement, p93-94 - Long-term value creation, p102 <p>Website:</p> <ul style="list-style-type: none"> - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Stakeholders: (nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/) <p>NIBC recognises its responsibilities towards stakeholders, regularly engages with them and considers their interests in its day-to-day decisions and activities. Engaging with stakeholders in a proactive way and on a continuous basis is central to our strategy and ambition to achieve sustainable growth..</p>
102-44	Key topics and concerns raised	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Stakeholder engagement and materiality, p90-94 - Examples of stakeholder engagement, p93-94 <p>Website:</p> <ul style="list-style-type: none"> - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Stakeholders: (nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/) <p>Key topics and concerns raised by stakeholder groups are catalogued in our annual Materiality Assessment and summarized in our Annual Report.</p>
102-45	Entities included in the consolidated financial statements	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - Principal Subsidiaries and associates, p280-281 <p>NIBC is the direct or indirect holding company for NIBC’s subsidiaries.</p> <p>NIBC consists of 60 (2018: 60) consolidated entities, including 12 (2018: 12) consolidated structured entities (for further details see note 57). 47 (2018: 46) of the entities controlled by NIBC are directly or indirectly held by NIBC at 100% of the ownership interests (share of capital). Third</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			parties also hold ownership interests in 13 (2018: 14) of the consolidated entities (non-controlling interests).
102-46	Defining report content and topic Boundaries	Core	<p>Annual Report: - Corporate Responsibility Reporting Scope, p366-367</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) - Stakeholders: (nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/)</p> <p>NIBC aims to be inclusive to all of its stakeholders, providing Sustainability Report content which is material and complete and for which the context is well described.</p>
102-47	List of material topics	Core	<p>Annual Report: - Stakeholder engagement and materiality, p90-94</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</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	Restatements of information	Core	Any restatements of information are noted in our Annual Report.
102-49	Changes in reporting	Core	No material changes from 2019 have been made in terms of our reporting.
102-50	Reporting period	Core	This GRI Content Index is for the full year 2019, from 01-01-2019 until 31-12-2019.
102-51	Date of most recent report	Core	Our prior report was published March 2019, for the period 01-01-2018 until 31-12-2018
102-52	Reporting cycle	Core	Annual from 1 January to 31 December.
102-53	Contact point for questions regarding the report	Core	<p>Annual Report - Contact information, p371</p> <p>Questions and feedback regarding NIBC's GRI Content Index and our approach towards sustainability, corporate social responsibility (CSR),</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			ESG, environmental issues or social issues may also be addressed to csr@nibc.com
102-54	Claims of reporting in accordance with the GRI Standards	Core	<p>Annual Report: - Corporate Responsibility Reporting Scope, p366-367</p> <p>NIBC has prepared its report in accordance with the latest GRI Standards, core option.</p> <p>For 2019, we have continued to provide additional disclosures beyond GRI's base requirement for core in order to provide greater transparency for interested readers and stakeholders.</p>
102-55	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	External assurance	Core	<p>Annual Report - Corporate responsibility reporting scope, p366-367</p> <p>The non-financial key figures and the related processes have been reviewed by NIBC's internal auditors. Internal Audit has confirmed that nothing has come to the attention that causes them to believe that the reported nonfinancial key figures for NIBC Holding N.V. are inadequately presented, in all material respects, in accordance with the reporting criteria. These figures were not externally audited in 2019.</p> <p>Our carbon footprint (Scope 1 and 2) estimates have been independently calculated for NIBC using tools provided by Climate Neutral Group, a social venture that was established in 2002 by Stichting Doen. Calculation of scope 3 estimates follows methodologies developed in the Partnership for Carbon Accounting Financials (PCAF).</p>
103-1	Explanation of the material topic and its Boundary	Core	<p>Material Topic: Financial Performance</p> <p>Annual Report: - Financial Highlights, p9 - Key Figures, p12-14 - Stakeholder engagement and materiality, p90-94</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>NIBC's stakeholders have indicated that financial performance is highly important to them. Stakeholders have expressed the importance that they place on NIBC focusing on its financial targets, maintaining its cost efficiency, building financial resilience and delivering on its promises. They also recognise that our ability to deliver positive non-financial impacts and contribute to the sustainable development goals relies on good financial performance. Therefore this is a material topic for NIBC.</p>
103-2	The management approach and its components	Core	<p>Annual Report: - Report of the Managing Board, p20-25</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</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. Our Annual Report, Pillar III, NACE Supplement, GRI Content Index, and Sustainability Report are clear examples of our approach.</p>
103-3	Evaluation of the management approach	Core	<p>Annual Report: - Financial Highlights, p9 - Key Figures, p12-14 - Financial Review, p26-43 - Consolidated financial statements 119-324</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</p> <p>NIBC continues to deliver on its promises by reporting a strong result over 2019. On the back of this performance, NIBC has been able to meet all of its medium-term objectives, including an upgrade of its credit rating to BBB+ by Standard & Poor's. In 2019, NIBC focused on the execution of its rebalancing strategy, as announced during the Capital Markets Update at the end of 2018. This strategy means an increased focus on those niches, in which NIBC can add value to its clients by offering the right financial solutions at their decisive moments. It also implies a reduction of our efforts in areas where it is not so clear that NIBC can play this decisive role, leading to reduced exposures in selected portfolios. With these results, NIBC has ensured it is a well capitalised bank with increasingly more granular exposures, enabling it to execute the selected strategy.</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
103-1	Explanation of the material topic and its Boundary	Core	<p>Topic: Product Responsibility</p> <p>Annual Report: - Stakeholder engagement and materiality, p90-94</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</p> <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>We recognize that the boundary for product responsibility is broad. It is closely connected with our code of conduct and duty of care 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.</p>
103-2	The management approach and its components	Core	<p>Annual Report: - Key Figures, 12-14 - Report of the Managing Board, p20-25 - Risk management, p55-74 - Sustainability p85-97 - Stakeholder engagement and materiality, p90-94 - Long-term value creation, p102 - Corporate Governance, p118-122</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</p> <p>All new products and services offered by NIBC undergo rigorous review as part of our NPARP 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>Additional testing is performed from time to time to ensure our high standards are maintained. For example during 2019, we tested for the presence of gender bias in our retail mortgage product offering. No evidence of gender discrimination was found across the scenarios that were tested.</p>
103-3	Evaluation of the management approach	Core	<p>Annual Report: - Key Figures, 12-14 - Risk management, p55-74 - Sustainability p85-97</p>

GRI	Disclosure Title	Core	NIBC Disclosure
			(specific annual report page references refer to the NIBC Holding NV annual report)
			<p>- Report of the Supervisory Board, p105-117 - Corporate Governance, p118-122</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</p> <p>Stakeholders view this as an area of strength for NIBC. Our retail clients expressed appreciation for our online platform and clear terms and conditions. Investors liked NIBC’s transparency, willingness to strengthen ESG standards and effort to open the leveraged loan market for increased responsible investment.</p>
103-1	Explanation of the material topic and its Boundary	Core	<p>Topic: Client Satisfaction</p> <p>Annual Report: - Key Figures, 12-14 - Non financial reporting, p 81-82 - Stakeholder engagement, p83-86</p> <p>Website: - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/)</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.</p> <p>Though not reported in specific metrics, we also closely monitor feedback received across all communication channels.</p>
103-2	The management approach and its components	Core	<p>Annual Report: - Key Figures, 12-14 - Non financial reporting, p 81-82 - Stakeholder engagement, p83-86 - Remuneration report, p124-129</p> <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>All employees with a function contract have a pre-agreed set of financial and non-financial (at least 50%) performance targets. Their performance</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>assessments take into account the achievement of pre-agreed targets, how they have behaved according to NIBC's corporate values, 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>
103-3	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - At a Glance, p5-7 - Key Figures, p12-14 - Performance Evaluation, p87-88 - Report of the Supervisory Board, p105-117 <p>Our most important stakeholder, the customer, continues to value our efforts to serve his or her interests. Due to increased attention for corporate loan Client Due Diligence and Know Your Customer documentation, which by some clients was perceived as bureaucratic and an administrative burden, this year's NPS for corporate clients decreased to 47% (2018: + 63%). Our NIBC Direct Customer Survey was 7.9 in 2019 (2018: 7.7). The success of a mid-sized niche market bank and retail offering like NIBC stands or falls with an excellent customer experience. Therefore, the Supervisory Board pays close attention to these metrics.</p>
201-1	Direct economic value generated and distributed		<p>Annual Report,</p> <ul style="list-style-type: none"> - At a Glance, p5-7 - Key Figures, p12-14 - Consolidated financial statements 119-324 <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	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
201-2	Financial implications and other risks and opportunities due to climate change		<p>Annual Report</p> <ul style="list-style-type: none"> - Letter from the CEO, p15 - Sustainability, p85-97 - SWOT Analysis, p100-101 - Climate Risk, p60-61 <p>By continuously adapting to the changing environment, we have significantly reduced corporate client exposures by more than EUR 750 million in 2019, mainly in the more cyclical sectors like Energy, Leveraged Finance, and Shipping, whilst growing in more granular portfolios, such as Receivables Finance and Leasing.</p> <p>We recognise climate change and water scarcity as the most material environmental risks for NIBC. From a financial perspective, there are seen as primarily medium to long term risks and have the potential to materialise if they are not well-managed and mitigated.</p> <p>The energy transition triggered by growing public awareness and technology developments is seen as an opportunity and is mentioned alongside sustainability ageing population, platformisation and consumer empowerment as trends influencing NIBC's focused strategy and business model.</p>
201-3	Defined benefit plan obligations and other retirement plans		<p>Annual Report,</p> <ul style="list-style-type: none"> - Pensions and Benefits, p81 - Remuneration report, p124-129 - Note 40 Employee benefit obligations, p246 <p>A collective defined-contribution plan (CDC-plan) is a pension plan under which NIBC each year pays a fixed percentage of the salaries of the members into the scheme. The size of the fund on retirement will be determined by how much was contributed to the scheme and the investment return achieved.</p> <p>The CDC-plan is based on an average salary plan. The retirement age is set at 68 years as per 1 January 2018. The contribution payable by participants in the CDC-plan is maximised at 4% per annum. Under the CDC-plan the annual pension contributions are calculated according to a fixed contribution calculation mechanism. The annual pension contribution of NIBC is maximised at 26% of the pensionable salary (salary minus a social security deductible).</p>
201-4	Financial assistance received from government		<p>During 2019, NIBC did not receive any financial assistance from the government for its own benefit (2018:0, 2017: 0).</p> <p>From time to time and for the benefit of our clients, NIBC does partner with governmental authorities for the benefit of clients or to co-invest for the benefit of clients.</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		<p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) <p>The 2019 ratio of standard entry level wages at NIBC is x2.32 (2018: 2.32). on average x2.20 for men (2018: 2.31), x2.15 for women (2018: 2.35). Entry level roles within NIBC vary by location, department, role and responsibility level. This does result in minor statistical differences by gender. By policy roles and responsibilities are compensated equally at NIBC regardless of gender.</p>
202-2	Proportion of senior management hired from the local community		<p>100% of new senior management hires during 2019 were made from the countries where they are based.</p>
203-1	Infrastructure investments and services supported		<p>Annual Report,</p> <ul style="list-style-type: none"> - Portfolio, p13 - General developments, p21 - Main developments in 2019, p28 - Corporate portfolios, p47-48 <p>Website</p> <ul style="list-style-type: none"> - NACE supplement, (nibc.com/about-nibc/investor-relations/annual-reports/) - Sustainability Report (nibc.com/about-nibc/sustainability/) <p>Within our Infrastructure portfolio we used to finance traditional infrastructure objects with long maturities. While we continue to serve our clients and help them throughout their business cycle, we are shifting towards digital infrastructure projects such as financing data centres and glass fibre networks providing essential services for rural communities, with relatively shorter tenors compared to the traditional infrastructure portfolio.</p>
203-2	Significant indirect economic impacts		<p>Annual Report,</p> <ul style="list-style-type: none"> - General Developments, p21 - Corporate client offering, p48-50 - Developments in risk management, p56-58 - Climate Risk, p60-61 - Risks and Outcomes, p88-89 <p>Significant indirect economic impacts are mentioned throughout our Annual Report.</p>
205-1	Operations assessed for risks related to corruption		<p>Annual Report</p> <ul style="list-style-type: none"> - Letter from the CEO, p15 - Anti-fraud and anti-corruption, p59-60

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>NIBC takes a comprehensive approach to mitigate risks related to corruption.</p> <p>For example, all staff received mandatory training during 2019 in regard to NIBC's 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.</p>
205-2	Communication and training about anti-corruption policies and procedures		<p>Annual Report - Anti-fraud and anti-corruption, p59-60</p> <p>Communication and training about anti-corruption are part of NIBC's regular compliance, ethics, and sustainability trainings.</p> <p>During 2019, NIBC employees were required to complete a mandatory training in regard to our corporate Code of Conduct 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>
205-3	Confirmed incidents of corruption and actions taken		<p>Annual Report - Anti-fraud and anti-corruption, p59-60</p> <p>No incidents of fraud, bribery or corruption were reported for 2019.</p>
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		<p>Annual Report - Key Figures, p12-14</p> <p>No legal actions for anti-competitive behavior, anti-trust and monopoly practices were reported for 2019.</p>
301-1	Materials used by weight or volume		<p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p>
301-2	Recycled input materials used		<p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p>
301-3	Reclaimed products and their packaging materials		<p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p>
302-1	Energy consumption within the organization		<p>Annual Report - Performance, p90</p> <p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			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.
302-2	Energy consumption outside of the organization		<p>Annual Report - Performance, p90</p> <p>Website: - Sustainability Report (nibc.com/about-nibc/sustainability/) - Sustainability Policy (nibc.com/about-nibc/sustainability/sustainability-governance/) - Environment Policy Supplement (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>NIBC also provides financing for and invests in renewable energy companies and projects. This is reported in our Annual Report and Pillar III report and is also well disclosed in our NACE supplement.</p>
302-3	Energy intensity		<p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>Energy intensity is reported in NIBC's sustainability Report.</p>
302-4	Reduction of energy consumption		<p>Annual Report - Performance, p90</p> <p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>Renovations completed in past years at our headquarters in The Hague delivered increased efficiency and reduced energy-related carbon emissions. This is contributing to our goal of reducing our direct emissions and is visible in the performance indicators reported in our Sustainability Report. Our geothermal system in our The Hague office allows NIBC to heat and cool using water, thereby reducing our reliance on gas and fossil fuels and improving our energy efficiency.</p>
302-5	Reductions in energy requirements of products and services		<p>Annual Report - Growth and Innovation North Westerly VI CLO), p48 - Retail Client Offering (Lot Hypotheken), p50 - Sustainable business, p86-87</p> <p>Website: - Sustainability Policies (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>NIBC promotes energy efficiency with its corporate and retail clients. For retail customers, NIBC mortgages allow financing to the legal limits to encourage energy renovations when financing a mortgage. In our corporate financings, we promote the use of best available technologies, sourcing of renewable electricity, and reuse of materials among other</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>practices. In Commercial Real Estate, clients are encouraged to achieve near energy neutrality for new buildings and encouraged to include energy efficiency enhancements during renovations.</p> <p>These initiatives aim to support national and international efforts to reduce energy consumption related to real estate in line with the Paris Climate Agreement.</p>
303-1	Water withdrawal by source		<p>Website - Sustainability Report (nibc.com/about-nibc/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.</p>
303-2	Water sources significantly affected by withdrawal of water		<p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <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>
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		<p>NIBC's own operations are not located in close proximity to protected areas, areas of high conservation value, or areas of high biodiversity value.</p>
304-2	Significant impacts of activities, products, and services on biodiversity		<p>Annual Report - Performance, p90</p> <p>During 2019, no severe environmental incidents including significant impacts on biodiversity related to NIBC's financings, own operations or supply chain were reported.</p> <p>To avoid or mitigate indirect impacts, NIBC screens potential clients and financings for biodiversity risks as part of its client and transaction due diligence processes.</p>
304-3	Habitats protected or restored		<p>Annual Report - Performance, p90 - Stakeholder engagement and materiality, p90-94</p> <p>Website: - Sustainability Policy (nibc.com/about-nibc/sustainability/sustainability-governance/)</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>- Environment Policy Supplement (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>
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations		<p>Annual Report</p> <p>- Performance, p90</p> <p>Website:</p> <p>- Sustainability Policy (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>- Environment Policy Supplement (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 2019. Furthermore there have been no material adverse environmental impacts reported to NIBC in regard to its financings and investments during 2019.</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>
305-1	Direct (Scope 1) GHG emissions		<p>Website</p> <p>- Sustainability Report (nibc.com/about-nibc/sustainability/)</p>
305-2	Energy indirect (Scope 2) GHG emissions		<p>Website</p> <p>- Sustainability Report (nibc.com/about-nibc/sustainability/)</p>
305-3	Other indirect (Scope 3) GHG emissions		<p>Annual Report</p> <p>- Risks and Outcomes, p88-89</p> <p>- Examples of Stakeholder Engagement, p93</p> <p>Website</p> <p>- Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>NIBC is working with authorities, peer banks and other stakeholders in regard to reporting of Scope 3 emissions related to the financial sector. We support efforts to develop a reporting standard which promotes transparency to our stakeholders and improved quality in reporting. During 2019, NIBC joined the Partnership for Carbon Accounting Financials (PCAF) to further engage on emerging carbon accounting standards in the financial sector with our financial peers. This will also help to develop NIBC's own disclosures.</p>
305-4	GHG emissions intensity		<p>Website</p> <p>- Sustainability Report (nibc.com/about-nibc/sustainability/)</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
305-5	Reduction of GHG emissions		<p>Annual Report</p> <ul style="list-style-type: none"> - Risks and Outcomes, p88-89 - Examples of Stakeholder Engagement, p93 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) <p>In our financings and investments, we recognise that GHG emissions are a cause of global warming and climate change. Climate risk is among the aspects evaluated in our corporate client due diligence and sustainability assessments and is mentioned as a material environmental risk in our Annual Report.</p> <p>In our financings, we support companies in traditional sectors as they reduce their emissions and transition to more sustainable practices. This also helps prevent economic shocks which might indirectly cause other sustainability risks such as unemployment. Examples are mentioned under GRI 302-5.</p> <p>In our operations, we continue to work to cut emissions related to our offices, operations and business travel. An example is mentioned under GRI 302-4 and further details are reported in our Sustainability Report.</p>
307-1	Non-compliance with environmental laws and regulations		<p>Annual report</p> <ul style="list-style-type: none"> - Key figures, p14 - Performance, p90 <p>No incidents of non-compliance with environmental or other laws and regulations were reported for 2019. Further, during 2019, no material adverse environmental incidents related to NIBC's financings, own operations or supply chain were reported.</p> <p>We recognise that there are environmental risks 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>
308-1	New suppliers that were screened using environmental criteria		<p>Annual Report</p> <ul style="list-style-type: none"> - Due diligence and monitoring, p88 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) - General purchasing and invoicing conditions (nibc.com/about-nibc/corporate-governance/) <p>NIBC screens new and existing suppliers against sustainability / ESG criteria using its internal know your supplier ("KYS") procedure.</p>
308-2	Negative environmental		<p>Annual Report</p> <ul style="list-style-type: none"> - Risks and Outcomes, p88-89

GRI	Disclosure Title	Core	NIBC Disclosure
	impacts in the supply chain and actions taken		<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 material adverse environmental impacts or incidents were reported regarding NIBC's supply chain during 2019. Potential suppliers which did not meet the sustainability criteria mentioned in NIBC's purchase conditions were rejected during our procurement process.</p> <p>No material adverse environmental impacts or incidents were reported related to supply chains of clients financed by NIBC during 2019. 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>
401-1	New employee hires and employee turnover		<p>Annual Report</p> <ul style="list-style-type: none"> - Key Figures, p14 - Our People, p74-82 <p>Sustainability Report</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) <p>In 2019, NIBC set out to measure our employee experience to gain insights into how our employees rate our culture, our leadership and their work experience by measuring the levels of engagement and commitment in our organisation. The four pillars of this survey were Engagement, Commitment, Employership and Leadership. The overall conclusion of this survey is that in general employees find NIBC a good organisation to work for and our employees are proud to work for NIBC.</p> <p>High participation of 81% (2018: 79%) in the survey provided solid insights, which led to the identification of the organisation's strengths and opportunities. The proportion of committed employees (commitment refers to the connection our employees feel towards our organisation) is 75% (2018: 73%) which is a positive result but also leaves room for improvement.</p>
401-2	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>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
401-3	Parental leave		<p>All employees are entitled to parental leave. This employee 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>
402-1	Minimum notice periods regarding operational changes		<p>Annual Report - Works Council, p80-81</p> <p>NIBC complies with the statutory requirements for operational changes in each of its operating locations.</p>
403-1	Workers representation in formal joint management-worker health and safety committees		<p>Annual Report Works Council, p80-81</p> <p>Workers are represented in formal joint management-worker discussions on health and safety by the NIBC Works Council.</p>
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities		<p>Annual Report - Key Figures, p14 - Absenteeism & vitality, p77</p> <p>Absenteeism remained very low at 2.0% in 2019 (2018: 2.1%, 2017: 2.2%). Absenteeism frequency decreased to 0.62 (2018: 0.8; 2017: 1.0).</p> <p>No work-related fatalities severe onsite injuries, or occupational diseases were reported during 2019 (2018:0; 2017: 0).</p>
403-3	Workers with high incidence or high risk of diseases related to their occupation		<p>For 2019. no high incidence or high risk of diseases related to occupation were found. (2018:0; 2017: 0).</p>
403-4	Health and safety topics covered in formal agreements with trade unions		<p>Annual Report - Works Council, p80-81</p> <p>Health and safety topics are covered in formal agreements. These are collectively bargained on behalf of workers with management by NIBC's Works Council, our employee representative body</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
404-1	Average hours of training per year per employee		<p>Annual Report</p> <ul style="list-style-type: none"> - Key Figures, p14 - Our People, p74, 78 <p>Partially reported. NIBC reports the average training expense per employee, but not the average number of hours per employee.</p> <p>The 2019 training expense are close to the top quartile when benchmarked with financial services, and close to the top decile compared to general industries. The amount is significantly higher than in prior years (2018: EUR 3100, 2017: EUR 2,300) and has enabled and motivated staff to further develop themselves beyond their current job and task.</p>
404-2	Programs for upgrading employee skills and transition assistance programs		<p>Annual Report</p> <ul style="list-style-type: none"> - Employee Experience, p76-77 - Training Spent, p74 - NIBC Academy, p81-82 <p>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.</p> <p>A number of examples of NIBC's efforts to upgrade employee skills and prepare for future transitions are mentioned in our Annual Report. These also offer targeted development in support of our goal of equal access and diversity at senior level positions.</p>
404-3	Percentage of employees receiving regular performance and career development reviews		<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>
405-1	Diversity of governance bodies and employees		<p>Annual Report:</p> <ul style="list-style-type: none"> - Non-Financial Highlights, p8 - Key Figures, p14 - Our People, p74, 78-79 <p>The gender diversity for our organisation slightly increased with 33% female staff (2018: 31%). Senior management remained stable in gender diversity to 15% (2018: 15%). We are fully committed to further continue our efforts and structural attention for inclusiveness and gender diversity.</p> <p>Increasing diversity among senior managers was a key focus area in 2019. Our objective is at least one third of our Supervisory Board and Managing Board members to be female. NIBC's Executive Committee meets this objective. NIBC is aware that it falls short of this goal with respect to the</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>Managing Board (nil on a total of three) and the overall senior positions (director level and higher), where the percentage remained the same as last year at 15% (2018: 15%). With regard to the Supervisory Board, the ratio of 29% is close to our objective.</p> <p>During 2019 female employees comprised: 26.8% of full time contracts, 55.2% of part time contracts, 32.1% of permanent contracts, 39.3% of temporary contracts, and 20.8% of employees working part time.</p> <p>NIBC will continue to address diversity as a high priority. In the case of a vacancy in the Managing Board or the Supervisory Board, the regular policy is applied in which we ask the executive search to shortlist at least 50% female candidates.</p>
405-2	Ratio of basic salary and remuneration of women to men		<p>Overall basic salary by level: In 2019: Professional Support 0.85 (2018: 0.84); Analyst 1.02 (2018: 1.00), Associate 1.06 (2018: 1.05), Vice President 1.12 (2018: 1.15), Associate Director 1.07 (2018: 1.09), Director 1.02 (2018: 1.01), Managing Director 0.89 (2018: 0.89).</p> <p>This calculation adheres to the GRI definition of basic salary and remuneration of women to men for each employee category, NIBC has systems in place to manage pay equity and monitors salary levels by gender to ensure fairness by level and responsibility.</p>
406-1	Incidents of discrimination and corrective actions taken		<p>Website - NIBC Code of Conduct, (nibc.com/about-nibc/corporate-governance/) - Sustainability Governance, (nibc.com/about-nibc/sustainability/sustainability-governance/) - Human Rights policy, (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>NIBC aims to ensure an open and inclusive corporate culture. We have zero tolerance for all forms of discrimination with respect to employment and occupation including verbal, physical and sexual harassment.</p> <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 2019.</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		<p>Website: - Human Rights Policy Supplement, 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 2019.</p> <p>NIBC's policies clearly support the UN Guiding Principles on Business and Human Rights, ILO conventions and standards, 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 lower tiers of the supply chain – ie the suppliers to the suppliers of our clients or suppliers.</p> <p>Since NIBC's suppliers are located near our operations in Northwest Europe, the risk of this in direct operations is low though NIBC continues to be alert to this potential risk.</p>
408-1	Operations and suppliers at significant risk for incidents of child labor		<p>Website - Sustainability Governance, (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>- Human Rights policy, (nibc.com/about-nibc/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 2019.</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>
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor		<p>Website - Sustainability Governance, (nibc.com/about-nibc/sustainability/sustainability-governance/) - Human Rights policy, (nibc.com/about-nibc/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 risks are seen to be low though NIBC is alert to these potential risks.</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>No operations or suppliers were identified to be significantly at risk in NIBC's due diligence and monitoring during 2019.</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>
410-1	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 2019, also in 2018 and 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>
411-1	Incidents of violations involving rights of indigenous peoples		<p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) - Human Rights policy (nibc.com/about-nibc/sustainability/sustainability-governance/) <p>No incidents of violations involving rights of indigenous peoples were reported in 2019 as related to NIBC's financings, our operations or our supply chain (2018: 0; 2017: 0).</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. During 2019, NIBC was also active in national and sectoral dialogues on land rights and FPIC.</p>
412-1	Operations that have been subject to human rights reviews or impact assessments		<p>Annual Report</p> <ul style="list-style-type: none"> - Non-Financial Highlights, p8 - Key Figures p14 - Sustainability, p85-97 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) - Human Rights policy (nibc.com/about-nibc/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</p>

GRI	Disclosure Title	Core	NIBC Disclosure
			(specific annual report page references refer to the NIBC Holding NV annual report)
			2019. 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.
412-2	Employee training on human rights policies or procedures		<p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/) - Human Rights policy (nibc.com/about-nibc/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 completed.</p> <p>NIBC's approach to Human Rights is further elaborated in our Human Rights Policy Supplement.</p>
412-3	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, p14 - Sustainability, p85-97 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance (nibc.com/about-nibc/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 2019. NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" (KYS) procedures and due diligence.</p>
413-1	Operations with local community engagement, impact assessments, and		<p>Annual Report:</p> <ul style="list-style-type: none"> - Sustainability, p85-97 - Stakeholder engagement and materiality, p90-94 <p>Website</p> <ul style="list-style-type: none"> - Sustainability initiatives (nibc.com/about-nibc/sustainability/focus-areas/society/)

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
	development programs		<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 2019 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, an initiative with the national Food Bank, Beequip's efforts to support the Honey Highway in support of biodiversity, and a holiday initiative for the children of Stichting Vitalis.</p>
413-2	Operations with significant actual and potential negative impacts on local communities		<p>Annual Report - Risks and Outcomes, p88-89</p> <p>No significant actual or potential negative impacts of NIBC operations or financings/investments on local communities were reported for 2019.</p>
414-1	New suppliers that were screened using social criteria		<p>Annual Report - Due diligence and monitoring, p88</p> <p>Website - Corporate Governance (nibc.com/about-nibc/corporate-governance/) - General purchasing and invoicing conditions, (nibc.com/about-nibc/corporate-governance/) - Sustainability Governance, (nibc.com/about-nibc/sustainability/sustainability-governance/) - Sustainability Report, (nibc.com/about-nibc/sustainability/sustainability/)</p> <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>
414-2	Negative social impacts in the supply chain and actions taken		<p>Annual Report - Risks and outcomes, p88-89 - Performance, p90 - Examples of stakeholder engagement, p93-94</p> <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 2018. Potential suppliers</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>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 2018. Despite this, we believe that these risks exist. 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>
415-1	Political contributions		<p>EUR 0. NIBC made no direct political contributions during 2019 (2018: 0; 2017: 0).</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>
416-1	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, p111-112 - Due diligence and monitoring, p88 <p>Website</p> <ul style="list-style-type: none"> - Corporate Governance (nibc.com/about-nibc/corporate-governance/) <p>NIBC assesses all new products and regularly reviews existing products as part of its internal NPARP (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>
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		<p>Annual Report</p> <ul style="list-style-type: none"> - Our People, p74-82 - Performance, p90 <p>During 2019, no incidents of non-compliance concerning the health and safety impacts of products and services were reported (2018: 0; 2017:0).</p>
417-1	Requirements for product and service information and labeling		<p>Annual Report</p> <ul style="list-style-type: none"> - Letter from the CEO, p15 - General Developments, p21 - Strategic Priorities, p23 - Sustainable Business, p86 - Risk Policy & Compliance Committee, p111 <p>NIBC adheres to all applicable rules and regulations for product information in the geographies where our products are marketed.</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			<p>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, our terms and conditions are written in plain language and avoid small print.</p>
417-2	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 2019 (2018: 0; 2017:0).
417-3	Incidents of non-compliance concerning marketing communications		No significant incidents of non-compliance concerning marketing communications were reported in 2019 (2018:0; 2017:0).
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data		<p>Annual Report - Client privacy and data security, p59</p> <p>During 2019, there were no severe leaks, thefts, or losses of customer data nor any complaints regarding breaches of customer privacy and losses of customer data (2018:0).</p> <p>We investigate every data breach incident made known to us: of these, during 2019 we assessed approximately 15% as meeting the criteria to be reported to our data protection regulators. Whilst none of these incidents were assessed as leading to a high risk for clients and no legal consequences were identified, we take all data breaches – not just those which are reportable externally – very seriously.</p> <p>We analyse each one for lessons to be learned and take appropriate follow-up actions. Often these are in the nature of reinforcing employee awareness of the need for constant attention to protecting client confidentiality and privacy, and we carry out ad hoc training where necessary to supplement our regular awareness programme, which is mandatory for all employees</p>
419-1	Non-compliance with laws and regulations in the social and economic area		<p>Annual Report - Key Figures, p14</p> <p>No significant fines or sanctions were incurred during 2019 (2018:1; 2017:1). NIBC defines significant fines to be those exceeding ten thousand euros received from a regulator or authority (see definitions on p369 of</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
			our Annual Report). No other significant non-monetary sanctions were reported.

Additional Disclosures

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
GRI- FS1	Policies with specific environmental and social components applied to business lines.		<p>Annual Report - Sustainability, p85-97</p> <p>Website: - Corporate Governance (nibc.com/about-nibc/corporate-governance/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>Environmental and human rights standards that apply to our corporate clients are described in our Sustainability Framework and Sustainability policies.</p>
GRI- FS2	Procedures for assessing and screening environmental and social risks in business lines.		<p>Annual Report - Sustainability, p85-97</p> <p>Website: - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>Our procedures for managing environmental, human rights and governance risks are described in our Sustainability Policy Framework.</p>
GRI- FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements of transactions.		<p>Annual Report - Due diligence and monitoring, p88</p> <p>Website: - Sustainability Governance (nibc.com/about-nibc/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.</p>
GRI- FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures.		<p>Annual Report - Sustainability, p85-97</p> <p>Website: - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/)</p> <p>During 2019, NIBC undertook mandatory trainings, workshops and e-learnings for all staff in regard to our 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</p>

GRI	Disclosure Title	Core	NIBC Disclosure
(specific annual report page references refer to the NIBC Holding NV annual report)			
			<p>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- FS5	Interactions with clients/ investors/ business partners regarding environmental and social risks and opportunities.		<p>Annual Report</p> <ul style="list-style-type: none"> - Non-Financial Highlights, p8 - Key Figures, p14 - Sustainability, p85-97 - Stakeholder engagement and materiality, p90-94 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) - Materiality Assessment (nibc.com/about-nibc/investor-relations/annual-reports/) <p>NIBC interacts with its stakeholders in regard to environmental and social risks and opportunities on a regular basis. These interactions are well-described in our Annual Report, on our website, and in our Sustainability Report.</p>
GRI- FS6	Percentage of the portfolio for business lines by specific region, size and by sector.		<p>Annual Report</p> <ul style="list-style-type: none"> - What we do, p6 - Corporate Client Offering, p46-49 - Retail Client Offering, p49-53 - Investment Risk, p68-69 - Operating Income per sector per country, p187 - Corporate Loan Distribution, p295-296 <p>Website</p> <ul style="list-style-type: none"> - Capital Markets Update, (nibc.com/about-nibc/investor-relations/equity-investors/capital-markets-update/) - NACE supplement, (nibc.com/about-nibc/investor-relations/annual-reports/) <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. Further information is also provided in our capital markets updates.</p>

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
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, NACE supplement, (nibc.com/about-nibc/investor-relations/annual-reports/) - Sustainability Report (nibc.com/about-nibc/sustainability/) <p>Our NACE supplement gives a detailed view into our corporate loan portfolio, the most material aspects of NIBC's business from an environmental perspective.</p>
GRI- FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures		<p>Annual Report</p> <ul style="list-style-type: none"> - Corporate Responsibility reporting scope, p366 <p>Internal audits are performed on key figures and the underlying environmental and social (sustainability) risk processes. For 2019, no external 3rd party audit was performed. Internal Audit confirmed that nothing has come to the attention that causes them to believe that the reported nonfinancial key figures for NIBC Holding N.V. are inadequately presented, in all material respects, in accordance with the reporting criteria.</p>
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</p> <ul style="list-style-type: none"> - Key Figures, p14 - Sustainability, p85-97 - Stakeholder engagement and materiality, p90-94 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Report (nibc.com/about-nibc/sustainability/) <p>Partially reported. By policy, 100% of corporate clients and transactions 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	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
GRI- FS11	Percentage of assets subject to positive and negative environmental or social screening.	Core	<p>Annual Report - Key Figures, p14</p> <p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>By policy, all corporate clients and corporate transactions (100%) are subject to a positive and negative screening by mean of a sustainability assessment. This process includes environmental, human rights and governance aspects.</p>
GRI- FS15	Policies for the fair design and sale of financial products and services	Core	<p>Annual Report - Risk Policy & Compliance Committee, p111 - Due diligence and monitoring, p88</p> <p>Website - Sustainability Report (nibc.com/about-nibc/sustainability/)</p> <p>All new products are required by policy to go through NIBC's new products approval and review procedure (NPARP). Changes to existing products are required to go through NIBC's significant product change procedure (SCAP).</p> <p>These operational risk management include checks to ensure fairness to clients (duty of care) and that sustainability aspects (environment, social, governance) are well-considered as part of the approval processes.</p> <p>Additional testing is performed from time to time to ensure our high standards are maintained. For example during 2019, we tested for the presence of gender bias in our retail mortgage product offering. No evidence of gender discrimination was found across the scenarios that were tested.</p>
GRI- FS16	Initiatives to enhance financial literacy by type of beneficiary	Core	<p>Annual Report - NIBC NGO Boulevard, p96-97 - Community Engagement, p 96</p> <p>Website - Sustainability Report (nibc.com/about-nibc/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 2019, 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. For retail clients, NIBC offers financial</p>

GRI	Disclosure Title	Core	NIBC Disclosure
			(specific annual report page references refer to the NIBC Holding NV annual report)
			counseling for clients which are in arrears. This is provided using third party services and is tailored to each client.