

2016 GRI Content Index

NIBC Bank N.V.

About This Report

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

For 2016, NIBC has chosen to update its approach from GRI G4 to the latest GRI Standards, which companies are asked to adopt no later than 30 June 2018. NIBC complies with the Core reporting option of the GRI Standards.

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

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

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

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




Every effort has been made to provide complete and clear information in our disclosures. For clarity, any references to our Annual Report refer to appropriate pages and sections within the 2016 NIBC Bank N.V. Annual Report and related report supplements. Any omissions are indicated within each disclosure.

Feedback Welcome


Your feedback on our disclosures is welcome and greatly appreciated.


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



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
General Disclosures						
I02-1	G4-3□	Name of the organization	Core	NIBC Bank N.V.		
I02-2	G4-4□	Activities, brands, products, and services	Core	Annual Report - At a Glance, p4-5 - Report of the Managing Board, p 16-17		
I02-3	G4-5□	Location of headquarters	Core	The Hague, Netherlands		
I02-4	G4-6□	Location of operations	Core	Annual Report, Our Markets p5 NIBC holds offices in the Netherlands, Belgium, Germany, and the United Kingdom.		
I02-5	G4-7□	Ownership and legal form	Core	NIBC is privately held by an investor group which is organized and led by JC Flowers & Co LLC. The bank is owned through a holding company, NIBC Holding NV, for which the bank is the most significant asset. NIBC Bank and NIBC Holding are unlisted. NIBC's legal form is N.V. (Naamloze Vennoootschap), a type of public company which is common among leading corporates in the Netherlands.		
I02-6	G4-8□	Markets served	Core	Annual Report - At a Glance, p4-5 - Report of the Managing Board, p 16-19		
I02-7	G4-9□	Scale of the organization	Core	Annual Report - At a Glance, p4-7 - Key Figures, p8-9		




GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-8	G4-I0□	Information on employees and other workers	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p4-7 - Key Figures, p8-9 - Our People, p52-55 <p>Our 2016 Sustainability Supplement on our corporate website provides additional details on our people. nibc.com/sustainability/</p>	6	
102-9	G4-I2□	Supply chain	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Value flow, p64 <p>NIBC's supply chain is limited in scope, consisting mostly of service companies such as IT, legal service providers, and communication service providers. During 2016, NIBC reviewed its providers of legal services. Material ESG aspects were one of the considerations during this review.</p> <p>Further details on our value chain are provided on our corporate website. nibc.com/sustainability/</p>		
102-10	G4-I3□	Significant changes to the organization and its supply chain	Core	<p>Annual Report</p> <ul style="list-style-type: none"> - Letter from the CEO, p11-12 - Value flow, p64 <p>In 2016, NIBC acquired SNS Securities which was renamed NIBC Markets. We also launched BEEQUIP, a new equipment leasing venture focusing on small and medium enterprises in the infrastructure, earthmoving, construction and logistics sectors.</p> <p>NIBC's supply chain is limited in scope, consisting mostly of service companies such as IT, legal service providers, and communication service providers. During 2016, NIBC reviewed its providers of legal services. Material ESG aspects were one of the considerations during this review.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				Further details on our value chain are provided on our corporate website. nibc.com/sustainability/		
102-11	G4-14	Precautionary Principle or approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Risk Management, p85-100 -Sustainability p59-60 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance nibc.com/about-us/corporate-governance/ - Sustainability Governance nibc.com/sustainability/sustainability-governance/ <p>NIBC applies the Precautionary Principle through its risk management and compliance approach toward potential environmental and social impact. Our sustainability framework and related policies govern our approach toward environmental and social concerns.</p>		



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-12	G4-15□	External initiatives	Core	<p>Website: - Corporate Governance nbc.com/about-us/corporate-governance/ - Sustainability Governance nbc.com/sustainability/sustainability-governance/</p> <p>Externally-developed economic, environmental and social charters, principles, or other initiatives which NIBC endorses and applies include: Dutch Banking Code Dutch Corporate Governance Code Equator Principles (member institution) UN Global Compact (signatory) Dutch IMVO/SER financial sector covenant (signatory) Universal Declaration of Human Rights (by policy) OECD Guidelines for Multinational Enterprises (by policy) ILO Core Conventions (by policy) UNPRI (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)</p> <p>Additional external principles and charters applied by NIBC are stated in our corporate governance, compliance and sustainability policies.</p>	1-10	
102-13	G4-16□	Membership of associations	Core	<p>37 NIBC employees are member of a Dutch Banking Association (NVB) or Dutch Association of Covered Bond Issuers (DACB). Paulus de Wilt is board member of the Dutch Banking Association (NVB). Herman Dijkhuizen is member of the Commission Supervision of the Dutch Banking Association (NVB).</p>		

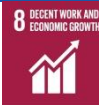

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-14	G4-1 <input type="checkbox"/>	Statement from senior decision-maker	Core	Annual Report, - Letter from the CEO, p11-12 - Report of the Managing Board, Sustainability p59-68		
102-15	G4-2 <input type="checkbox"/>	Key impacts, risks, and opportunities		Annual Report, - SWOT analysis, p20-21 - Risk Management, p85-100		
102-16	G4-56 <input type="checkbox"/>	Values, principles, standards, and norms of behavior	Core	Annual Report, - Who we are, p4-5 - Embedding our corporate values p15 - Strategy & Objectives, p21 Website, - Vision and Principles, nibc.com/about-us/vision-and-principles/ - Code of Conduct, nibc.com/about-us/corporate-governance/ As part of their employment contract, each staff member has agreed to adhere to the NIBC code of conduct. Dutch staff also sign the Bankers Oath, which is also displayed prominently in NIBC's offices in the Hague and Amsterdam. Training on NIBC's values, ethics, and code of conduct are provided regularly to all new and existing staff.	10	




GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-17	G4-57, G4-58	Mechanisms for advice and concerns about ethics		<p>Annual Report</p> <ul style="list-style-type: none"> - Engagements in 2016, p66, <p>Website:</p> <ul style="list-style-type: none"> - Grievances and complaints, nibc.com/contact-nibc/complaints-form/ - Code of Conduct, nibc.com/about-us/corporate-governance/ - Whistleblowing, nibc.com/about-us/corporate-governance/compliance/ <p>NIBC's offers an online complaints and grievance mechanism on its website. Internal whistleblowing procedures are available to employees on NIBC's intranet. These mechanisms are included in guidance provided to employees for NIBC's Code of Conduct.</p> <p>During 2016, NIBC also signed and joined the Dutch IMVO covenant for the banking sector which in part has a focus on grievance and remedy mechanisms for large projects and corporate loans. Learnings from this initiative could lead to future refinements of our approach in this area.</p>	10	
102-18	G4-34	Governance structure	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Report of the Supervisory Board, p70-76 - Corporate Governance, p82-84 <p>Website:</p> <ul style="list-style-type: none"> - Corporate Governance nibc.com/about-us/corporate-governance/ - Sustainability Governance nibc.com/sustainability/sustainability-governance/ 		



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-19	G4-35	Delegating authority		<p>Annual Report: - Report of the Supervisory Board, p70-76 - Corporate Governance, p82-84</p> <p>Website: - Corporate Governance nibc.com/about-us/corporate-governance/ - Sustainability Governance nibc.com/sustainability/sustainability-governance/</p>		
102-20	G4-36	Executive-level responsibility for economic, environmental, and social topics		<p>Annual Report - Sustainability, p59-60</p> <p>Website - Sustainability Governance nibc.com/sustainability/sustainability-governance/</p> <p>NIBC's Managing Board is responsible for economic, environmental and social topics. NIBC has appointed a Senior Sustainability Officer to be responsible for sustainability and corporate social responsibility who reports directly to the Managing Board for these topics.</p>		
102-21	G4-37	Consulting stakeholders on economic, environmental, and social topics		<p>Annual Report: - Stakeholder Engagement, p62-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p>		 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-29	G4-45	Identifying and managing economic, environmental, and social impacts		<p>Annual Report</p> <ul style="list-style-type: none"> - Sustainability, p59-60 - Risk Management, p85-100 - Investment Risk, p96 - Materiality Assessment annualreport2016.nibc.com/ <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance nibc.com/sustainability/sustainability-governance/ <p>NIBC's Managing Board is overall responsible for identifying and managing economic environmental, and social topics. Stakeholders are regularly consulted to identify and prioritize the issues which are most material and salient for them and the potential impacts, risks, and opportunities. These are mentioned in the risk management section of our Annual Report and elaborated in NIBC's materiality assessment.</p>		
102-30	G4-46	Effectiveness of risk management processes		<p>Annual Report:</p> <ul style="list-style-type: none"> - At a glance, p6-7 - Key figures, p8-10 <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>Assurance on these indicators was provided as part of our 3rd party audit. These indicators and underlying processes are also audited internally.</p>		
102-31	G4-47	Review of economic, environmental, and social topics		<p>Non financial aspects are reviewed by Audit Committee of Sup Board. Furthermore, these topics are considered within NIBC's risk framework, which involves regular reviews, in-control processes, and recording of any events.</p>		


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-32	G4-48	Highest governance body's role in sustainability reporting		The Supervisory Board and Managing Board review the draft annual report, including the non-financial aspects. The Supervisory Board signs off on the report.		
102-33	G4-49	Communicating critical concerns		Concerns are communicated in a variety ways depending on the nature and materiality of the concerns. This could include Managing Board discussions, stakeholder meetings, engagement with the Sustainability team, communications with clients, etc.		
102-34	G4-50	Nature and total number of critical concerns		No critical concerns were communicated during 2016.		
102-35	G4-51	Remuneration policies		<p>Annual Report, - Remuneration p77-81</p> <p>Website - Corporate Governance nibc.com/about-us/corporate-governance/supervisory-board/ - Compliance with Banking Code, p6 nibc.com/about-us/corporate-governance/governance-codes/</p> <p>NIBC's remuneration policy is annually reviewed and amended to fulfill relevant laws, regulations and guidelines.</p> <p>The remuneration policy has a long term focus and is in line with the bank's risk policy. All employees have a pre agreed set of financial and non-financial (at least 50%) targets.</p> <p>Their performance assessment takes into account the achievement of pre agreed targets, how they have behaved according to NIBC's business principles, as well as their contribution towards the bank's long term objectives. One of the main non-financial performance aspects is compliance with all relevant internal requirements and external regulations. Other non-financial performance aspects</p>		 



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				include client satisfaction, transparency and sustainability.		
102-36	G4-52	Process for determining remuneration		<p>Annual Report, - Remuneration p77-81</p> <p>Website - Corporate Governance nibc.com/about-us/corporate-governance/supervisory-board/ - Compliance with Banking Code, p6 nibc.com/about-us/corporate-governance/governance-codes/</p> <p>The process for determining remuneration is set out in NIBC's "Governance of remuneration policies, roles and responsibilities" document on our website and is summarized in our Annual Report.</p> <p>All employees have a pre-agreed set of financial and non-financial (at least 50%) performance targets. Their performance assessments take into account the achievement of pre-agreed targets, how they have behaved according to NIBC's Business Principles, as well as their contributions towards the Bank's longer-term objectives. Non-financial performance aspects include client satisfaction, employee satisfaction, transparency, and sustainability. The Dutch Banking Code serves as a guideline for all employees.</p>		 

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
I02-37	G4-53	Stakeholders' involvement in remuneration		<p>Annual Report, - Remuneration p77-81</p> <p>Views from stakeholders on our remuneration policy are received as part of our regular stakeholder dialogues and are considered in the remuneration process.</p> <p>Their influence is visible in our control framework which ensures that remuneration practices do not result in incentivising and / or rewarding excessive risk taking which could lead to the actions or lack of actions as defined in the risk tolerance statements, as well as unwanted behaviors relating to market conduct, reputational risks, etc.. Furthermore, the framework ensures that NIBC's remuneration policies and practices do not lead to reward for failure, amongst others by ensuring that any performance which is rewarded, is aligned with NIBC's strategy and business objectives, taking due account of the defined risk tolerances and conduct fitting for NIBC.</p>		
I02-38	G4-54	Annual total compensation ratio		<p>Annual Report, - Remuneration p79</p> <p>The 2016 compensation ratio (total compensation costs as percentage of operating income) was 25.3%.</p>		
I02-39	G4-55	Percentage increase in annual total compensation ratio		<p>Annual Report, - Remuneration p79</p> <p>Compared to 2015, the annual compensation ratio <u>decreased</u> by 2.8% to 25.3%. The 2015 compensation ratio (total compensation costs as percentage of operating income) was 28.1%.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-40	G4-24	List of stakeholder groups	Core	<p>Annual Report: - Stakeholder Engagement, p62-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>NIBC's stakeholder groups include corporate and retail customers, employees, equity investors, rating agencies, debt investors, civil society organizations (NGOs), regulators and authorities, business partners (suppliers), and press and media.</p>	1	
102-41	G4-11	Collective bargaining agreements	Core	<p>100% of NIBC's employees are represented in formal discussions with management by the NIBC Employees Council.</p> <p>The current employee benefit scheme was negotiated and agreed with the Employees Council. The prior collective bargaining agreement ended per 1 January 2014.</p>	3	 
102-42	G4-25	Identifying and selecting stakeholders	Core	<p>Annual Report: - Stakeholder Engagement, p62-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>In 2016, our stakeholder consultation was performed across nine stakeholder groups representing our retail clients, corporate clients, equity investors, debt investors, regulators, civil society, employees, rating agencies, and press and media.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-43	G4-26, G4-PR5	Approach to stakeholder engagement	Core	<p>Annual Report: - Stakeholder Engagement, p62-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>Throughout 2016, we engaged with a wide range of stakeholders through dedicated consultations to ensure that feedback was being shared effectively with management and across our business.</p>		
102-44	G4-27, G4-PR5	Key topics and concerns raised	Core	<p>Annual Report: - Stakeholder Engagement, p62-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>Key topics and concerns raised by stakeholder groups are catalogued in our annual Materiality Assessment and summarized in our annual report.</p>	1	
102-45	G4-17	Entities included in the consolidated financial statements	Core	<p>Annual Report - Principal Subsidiaries and Offices, p331</p> <p>The NIBC Bank N.V. Annual Report 2016 reports on the activities of NIBC Bank N.V., including all international offices, and 100% subsidiaries which have been established by NIBC for our business purposes.</p> <p>The NIBC Holding Annual Report includes NIBC Bank and Beequip, our leasing affiliate.</p>		



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-46	G4-18	Defining report content and topic Boundaries	Core	<p>Annual Report: - Corporate Responsibility Reporting Scope, p332-333</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/ - Stakeholders: nibc.com/sustainability/our-value-chain/stakeholders/</p> <p>NIBC aims to be inclusive to all of its stakeholders, providing sustainability report content which is material and complete and for which the context is well described.</p>		
102-47	G4-19	List of material topics	Core	<p>Annual Report: - Stakeholder Engagement, p62-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/</p> <p>A list of material topics is provided in NIBC's Materiality Assessment report. This is further supported through regular stakeholder dialogues, both formal and informal.</p>		
102-48	G4-22	Restatements of information	Core	Any restatements of information are noted in our Annual Report.		
102-49	G4-23	Changes in reporting	Core	For 2016, NIBC has chosen to adopt the new GRI Standards. We have also are provided references for GRI G4 for comparability.		
102-50	G4-28	Reporting period	Core	This GRI Content Index is for the full year 2016, from 01-01-2016 until 31-12-2016		
102-51	G4-29	Date of most recent report	Core	Our prior report was published 1 April 2015, for the period 01-01-2015 until 31-12-1015		
102-52	G4-30	Reporting cycle	Core	Annual from 1 January to 31 December		



GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-53	G4-31	Contact point for questions regarding the report	Core	Annual Report - Contact information, p330 Questions and feedback regarding NIBC's GRI Content Index and our approach towards sustainability, corporate social responsibility (CSR), environmental issues or social issues may also be addressed to csr@nibc.com		
102-54	G4-32-a	Claims of reporting in accordance with the GRI Standards	Core	NIBC has prepared its report in accordance with the latest GRI Standards, core option. For 2016, We have also provided additional disclosures beyond GRI's base requirement for core in order to provide greater transparency for readers and stakeholders.		
102-55	G4-32-b	GRI content index	Core	NIBC's GRI Content Index is updated and published annually, within 30 days of the publication of our Annual Report. For each element, we provide direct answers, page and section references to our Annual Report, and links to other online resources and documents.		
102-56	G4-32c, G4-33	External assurance	Core	Annual Report - Corporate responsibility reporting scope, p332 - Corporate responsibility assurance report, p338-340 Non-financial key figures reported by NIBC in its Annual Report. NIBC's Supervisory Board and Managing Board have sought independent external assurance which has been provided to NIBC by EY. Our 2016 non-financial key figures have been audited with reasonable assurance. The non-financial key figures and the related processes have also been audited by NIBC's internal auditors. No exceptions were reported. Our carbon footprint has been independently calculated and verified for NIBC by Climate Neutral Group, a social venture that	I, 10	

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				was established in 2002 by Stichting Doen.		
Management Approach						
I03-1	G4-DMA-a, G4-20, G4-21	Explanation of the material topic and its Boundary	Core	<p>Material Topic: Transparency</p> <p>Annual Report: - Report of the Managing Board, p 14 - Materiality Assessment, p 64-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/</p> <p>NIBC's stakeholders have indicated that transparency is highly important to them. Our stakeholders view transparency and product responsibility as a foundation for trust. Therefore this is a material topic for NIBC.</p> <p>The boundary for transparency for NIBC is guided by materiality and practicality. As an regulated bank, this begins with regulatory reporting requirements and reporting requirements from our other commitments like GRI and UNGC. It includes material aspects which our stakeholders would like NIBC to regularly report.</p> <p>The requirements are different (generally less) for unlisted companies, but stakeholders expect insightful and balanced reporting which is coherent and relevant to the geographic footprint, business footprint and product offerings of NIBC.</p>		
I03-2	G4-DMA-b, G4-EN34, G4-LA16, G4-HR12, G4-SO11	The management approach and its components	Core	<p>Annual Report: - Report of the Managing Board, p 14 - Materiality Assessment, p 64-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/</p> <p>As a professional, entrepreneurial and inventive financial partner,</p>		





GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>we look to build long-term relationships that are based on trust, transparency and reliability..</p> <p>We report financial and non-financial information publicly as part of our Annual Report and other disclosures. We commit to adhering to international standards in our financial and non-financial reporting.</p>		
103-3	G4-DMA-c	Evaluation of the management approach	Core	<p>NIBC has continued to increase our reporting and adjust the reporting that we provide toward topics and indicators that are important to our stakeholders.</p> <p>Our Annual Report, Pillar III, NACE Supplement GRI content index, and Sustainability Supplement are clear examples of our approach.</p> <p>The results of our approach can be seen in improvements to our retail website, which has become a closer communication channel with clients and earned the “Website of the Year” award by the Dutch Marketing Authority. Other indicators include improved results in the Dutch Transparency Benchmark.</p>		
103-1	G4-DMA-a, G4-20, G4-21	Explanation of the material topic and its Boundary	Core	<p>Topic: Product Responsibility</p> <p>Annual Report: - Materiality Assessment, p 64-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/</p> <p>Stakeholders view product responsibility and transparency as part of the foundation for their trust in NIBC. They have indicated that product responsibility is highly important to them. Therefore this is a material topic for NIBC.</p> <p>All new products and services offered by NIBC undergo rigorous review as part of our NPAP approval process. Material changes to existing products go through an SCAP approval process. Aspects such as ensuring NIBC’s duty of care toward clients are key</p>		


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				<p>considerations in these approval processes.</p> <p>We recognize that the boundary for product responsibility is broad. It is closely connected with our code of conduct and duty of care 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>		
I03-2	G4-DMA-b, G4-EN34, G4-LA16, G4-HR12, G4-SO11	The management approach and its components	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Letter from the CEO, p 11-12 - Materiality Assessment, p 64-68 <p>Website:</p> <ul style="list-style-type: none"> - Materiality Assessment annualreport2016.nibc.com/ <p>In our markets, we have focused on corporate banking sectors in which we have the greatest impact and expertise, and where we can offer products and expertise not available elsewhere. This has been a crucial means of differentiating ourselves in a market dominated by pricing pressures.</p> <p>In Retail Banking, NIBC has followed its entrepreneurial instincts by supporting our clients by growing our buy-to-let mortgage product and through our first “originate to manage”.</p>		
I03-3	G4-DMA-c	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> - Report of the Managing Board, p50 <p>In late 2016, NIBC Direct was recognised by FMH Finanzberatung on behalf of Handelsblatt as ‘TOP Online Broker’ for both wealthy investors in traditional custodies and for active smaller ticket investors. Our retail website has earned the “Website of the Year” award by the Dutch Marketing Authority.</p> <p>Product responsibility is best evaluated over both the short and the</p>		









GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				long term, Therefore improved results in annual surveys such as the Dutch Transparency Benchmark and other third parties.		
I03-1	G4-DMA-a, G4-20, G4-21	Explanation of the material topic and its Boundary	Core	<p>Topic: Client Satisfaction</p> <p>Annual Report:</p> <ul style="list-style-type: none"> - At a Glance, p4-7 - Key Figures, p8-9 - Materiality Assessment, p 64-68 <p>Website:</p> <ul style="list-style-type: none"> - Materiality Assessment annualreport2016.nibc.com/ <p>Stakeholders have indicated that client satisfaction is a highly important aspect as it can be seen as an indication of future financial and non-financial performance. Therefore it is a material aspect for NIBC</p> <p>The primary measurements of client satisfaction used by NIBC are NPS score for corporate banking and the client satisfaction survey results for NIBC Direct. Though not reported in specific metrics, we also are highly aware of feedback received across all communication channels.</p>		 
I03-2	G4-DMA-b, G4-EN34, G4-LA16, G4-HR12, G4-SO11	The management approach and its components	Core	<p>Our management approach toward client satisfaction is both proactive and reactive.</p> <p>Surveys such as NPS and client satisfaction provide clear views looking backwards on how we performed. However, the overall approach includes a proactive approach to duty of care, which in our view has a big influence on client satisfaction.</p> <p>Non financial aspects including client satisfaction are taken into account as part of discretionary bonus and compensation at NIBC.</p>		















GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
I03-3	G4-DMA-c	Evaluation of the management approach	Core	<p>Annual Report: - At a Glance, p4-7 - Key Figures, p8-9</p> <p>NPS for corporate banking and client satisfaction survey results for NIBC Direct have continued to show strong results in 2016. Numerous direct stakeholder discussions were held through 2016, allowing stakeholders to express their views, challenge us on our approach, and offer useful feedback on areas where we excel or should improve.</p>		
I03-1	G4-DMA-a, G4-20, G4-21	Explanation of the material topic and its Boundary	Core	<p>Topic: Stakeholder Engagement</p> <p>Annual Report: - Materiality Assessment, p 64-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/</p> <p>Stakeholders have indicated that stakeholder engagement is an important aspect since it ensures that stakeholder interests are heard and given priority within the bank. Therefore this is a material topic for NIBC.</p> <p>NIBC engages with our stakeholders to understand their expectations and interests. In general, stakeholder engagement takes place in different forms, from regular and ongoing dialogues to direct feedback requests and specific consultation sessions.</p>		 















GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
103-2	G4-DMA-b, G4-EN34, G4-LA16, G4-HR12, G4-SO11	The management approach and its components	Core	<p>Annual Report: - Materiality Assessment, p 64-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/</p> <p>In 2016, there were regular interactions with our stakeholders. We consulted our stakeholder advisors regarding their views on material sustainability themes for NIBC; we held one-on-one meetings with stakeholder groups and participated in a number of events. In addition, we analysed documentation to learn which topics stakeholders consider to be material.</p> <p>Furthermore we continued to hold recurring internal stakeholder sessions in which employees who frequently interact with stakeholders participate. During these sessions the variety of themes and topics that our stakeholders find material are shared, aimed at creating further awareness and understanding.</p>		
103-3	G4-DMA-c	Evaluation of the management approach	Core	<p>Annual Report: - Sustainable Shipping, p 61 - Materiality Assessment, p 64-68</p> <p>Website: - Materiality Assessment annualreport2016.nibc.com/</p> <p>To date the management approach seems appropriate given the size, geographic reach, ownership structure, and product scope of NIBC.</p> <p>An increasing number of our stakeholder engagements were publicly communicated in traditional press and media and on social media by NIBC and its employees. Furthermore, NIBC engaged in key multi-stakeholder dialogues related to the Dutch IMVO covenant, Responsible Ship Recycling Standards and other fora.</p>		
Economic Performance						













GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
201-1	G4-EC1	Direct economic value generated and distributed		<p>Annual Report, - At a glance, p6-7 - Key figures, p8-10 - Consolidated financial statements 104-287</p> <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>		
201-2	G4-EC2	Financial implications and other risks and opportunities due to climate change		<p>Annual Report - SWOT Analysis, p21</p> <p>In 2016, NIBC updated its Sustainability policy for the Infrastructure sector to exclude financings of coal and lignite-fired power generation due to climate and related environmental risks. This change will not impact NIBC's existing portfolio or financial result, since we had not financed or invested in coal-fired power generation recently.</p> <p>In our Annual Report on p21, we mention our exposure to the Oil & Gas and Shipping & Intermodal sectors as a threat or risk. Our exposure to these sectors is currently 6% and 8% respectively of our total exposure.</p> <p>NIBC will continue to monitor climate risk and other environmental risks related to new clients and transactions and as part of regular reviews of its lending portfolio and investments.</p>	7	 
201-3	G4-EC3	Defined benefit plan obligations and other retirement plans		<p>Annual Report, - Pension and Benefits, p56 - Employee Benefits, p199 - Pension plan obligations, p200</p> <p>The revisions to our employee benefits that were undertaken in 2014 and 2015 have allowed us to operate a more modern set of</p>		 


GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				benefits, which are more flexible and better aligned to the realities of our business. Our revised pension plan is a collective-defined contribution scheme for salaries up to EUR 100,519 and is applicable for all employees.		
201-4	G4-EC4	Financial assistance received from government		NIBC does not receive any financial assistance from the government for its own benefit. From time to time and for the benefit of our clients, NIBC does partner with governmental authorities to provide financing to clients or to co-invest in our clients.		
Market Presence						
202-1	G4-EC5	Ratios of standard entry level wage by gender compared to local minimum wage		Entry level roles within NIBC vary by department, role and responsibility level. This does result in minor statistical differences by gender. The ratio of standard entry level wages at NIBC is x2.13 on average (x2.16 for men, x2.09 for women) in 2016. By policy roles and responsibilities are compensated equally at NIBC. The small statistical difference is due to different numbers of by gender in each location and variances in responsibility and roles. Local minimum wage on average is EUR 1537.20 per month. This is well above fair living wage levels in our operating locations according to wageindicator.org, which indicates a fair living wage (highest individual, per month) of EUR 1100 in the Netherlands, 1150 in Germany, 1411 in Belgium, and GBP 1040 in the UK.	6	
202-2	G4-EC6	Proportion of senior management hired from the local community		100% of new senior management hires during 2016 were made from the countries where they are based.		
Indirect Economic Impacts						












GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
203-1	G4-EC7	Infrastructure investments and services supported		<p>Annual Report, - Corporate Banking, p40-41 Website - NACE supplement, annualreport2016.nibc.com/</p> <p>NIBC's sector focus areas for financings and investments include Infrastructure and Renewables. NIBC also invests in these sectors through its infrastructure fund, NEIF. Our financings and investments support a wide range of beneficial infrastructure including schools, hospitals, solar energy, wind energy, student housing, and social housing.</p>		   
203-2	G4-EC8	Significant indirect economic impacts		<p>In its headquarters in The Hague, NIBC is sharing its office space with five civil society organizations (NGOs) as part of an initiative known as the NIBC NGO Boulevard. The initiative aims to make modern office space and facilities available to NGOs in order to increase the impact of their work.</p> <p>NIBC includes the office energy use, heating, water, and waste figures for these organizations in its own footprint calculations in The Hague, offsetting much of the direct emissions of these organizations.</p>	7, 8	 
Anti-Corruption						
205-1	G4-SO3	Operations assessed for risks related to corruption		<p>NIBC takes a comprehensive approach to mitigate risks related to corruption.</p> <p>For example, 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 all suppliers of services to NIBC.</p>	10	 








GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
205-2	G4-SO4	Communication and training about anti-corruption policies and procedures		Communication and training about anti-corruption are part of NIBC's regular compliance, ethics, and sustainability trainings.	10	 
205-3	G4-SO5	Confirmed incidents of corruption and actions taken		No incidents of corruption were reported for 2016.	10	 
Anti-Competitive Behaviour						
206-1	G4-SO7	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		No legal actions for anti-competitive behavior, anti-trust and monopoly practices were reported for 2016.	10	
Materials						
301-1	G4-EN1	Materials used by weight or volume		Website - Sustainability Supplement report nbc.com/sustainability	8	 
301-2	G4-EN2	Recycled input materials used		Website - Sustainability Supplement report nbc.com/sustainability	8	 
301-3	G4-EN28	Reclaimed products and their packaging materials		Website - Sustainability Supplement report nbc.com/sustainability	8	 
Energy						
302-1	G4-EN3	Energy consumption within the organization		Website - Sustainability Supplement report nbc.com/sustainability	8	  











GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
302-2	G4-EN4	Energy consumption outside of the organization		NIBC provides financing for and invests in renewable energy companies and projects. This is reported in our Annual Report and Pillar III report with "Infrastructure and Renewables" and in our NACE supplement. We do not currently report indirect energy consumption, for example in our supply chain.	8	  
302-3	G4-EN5	Energy intensity		Website - Sustainability Supplement report nibc.com/sustainability	8	  
302-4	G4-EN6	Reduction of energy consumption		Website - Sustainability Supplement report nibc.com/sustainability For 2016, overall energy consumption increased, reversing a trend of year-on-year decreases since 2012. The main contributing factor was a malfunctioning of our geothermal heating infrastructure at our offices in the Hague. Electricity use also rose, largely due to increased occupancy of office space leased to commercial tenants and NGOs in the NIBC NGO Boulevard.	8	   
302-5	G4-EN7	Reductions in energy requirements of products and services		Not directly applicable. However, NIBC does promote energy efficiency with its corporate and retail clients.	8	   
Water						














GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
303-1	G4-EN8	Water withdrawal by source		<p>Website - Sustainability Supplement report nibc.com/sustainability</p> <p>Each of NIBC's offices is connected to local municipal water mains. Total usage for each location is reported in our sustainability supplement. For The Hague, the figures include commercial tenants of NIBC's offices as well as NGOs operating at NIBC's NGO Boulevard.</p>	8	  
303-2	G4-EN9	Water sources significantly affected by withdrawal of water		In its operations, NIBC uses local municipal water supplies. No water sources are significantly affected by withdrawal of water due to NIBC's operations.	8	  
Biodiversity						
304-1	G4-EN11	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		NIBC's own operations are not located in close proximity to protected areas and areas of high biodiversity value.	8	  
304-2	G4-EN12	Significant impacts of activities, products, and services on biodiversity		<p>There were no known negative impacts on biodiversity from NIBC's own operations during 2016. Furthermore there have been no negative impacts on biodiversity reported to NIBC in regard to its financings and investments.</p> <p>NIBC screens potential clients and financings for biodiversity risks as part of its client and transaction due diligence processes.</p>	8	  












GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
304-3	G4-EN13	Habitats protected or restored		NIBC performs sustainability due diligence for all clients and transactions in order to protect existing habitats and avoid any harm towards biodiversity.	8	  
304-4	G4-EN14	IUCN Red List species and national conservation list species with habitats in areas affected by operations		<p>There were no negative impacts from NIBC's own operations on IUCN Red List species, national conservation list species or sensitive habitats during 2016.</p> <p>Furthermore there have been no negative biodiversity impacts reported to NIBC in regard to its financings and investments during 2016.</p>	8	  
Emissions						
305-1	G4-EN15	Direct (Scope 1) GHG emissions		Website - Sustainability Supplement report nibc.com/sustainability	8	 
305-2	G4-EN16	Energy indirect (Scope 2) GHG emissions		Website - Sustainability Supplement report nibc.com/sustainability	8	 
305-3	G4-EN17	Other indirect (Scope 3) GHG emissions		Website - Sustainability Supplement report nibc.com/sustainability	8	  
305-4	G4-EN18	GHG emissions intensity		Website - Sustainability Supplement report nibc.com/sustainability	8	 





GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
						
305-5	G4-EN19	Reduction of GHG emissions		<p>Website - Sustainability Supplement report nibc.com/sustainability</p> <p>NIBC continues to work to reduce its direct GHG impact through its environmental management program.</p> <p>Our program has included renovations and improvements to our headquarters in the Hague including the installation of a geothermal facility which aims to reduce energy needed for heating and cooling.</p>	8	  
Environmental Compliance						
307-I	G4-EN29	Non-compliance with environmental laws and regulations		<p>Annual report - Key figures, p8-10</p> <p>No incidents of non-compliance with environmental or other laws and regulations were reported for 2016.</p>	7, 8	   
Supplier Environmental Assessment						
308-I	G4-EN32	New suppliers that were screened using environmental criteria		<p>Website - Sustainability Supplement report nibc.com/sustainability - General purchasing and invoicing conditions nibc.com/about-us/corporate-governance/</p> <p>NIBC screens new and existing suppliers against sustainability / ESG criteria using its internal know your supplier ("KYS") procedure. Updated procedures were introduced in 2016, resulting in 13% of new suppliers and 37% of existing suppliers were screened during 2016.</p>	7, 8	  






GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
308-2	G4-EN33	Negative environmental impacts in the supply chain and actions taken		No negative environmental impacts were reported for existing suppliers in 2016.	7, 8	  
Employment						
401-1	G4-LA1	New employee hires and employee turnover		Annual Report - At a Glance, p4-7 - Key Figures, p8-9 - Our People, p52-55		
401-2	G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees		None reported.		
401-3	G4-LA3	Parental leave		NIBC complies with the statutory requirements for parental leave in each of its operating locations.		
Labor/Management Relations						
402-1	G4-LA4	Minimum notice periods regarding operational changes		NIBC complies with the statutory requirements for operational changes in each of its operating locations.		
Occupational Health & Safety						
403-1	G4-LA5	Workers representation in formal joint management-worker health and safety committees		Annual Report Health and Safety, p. 42 All workers are represented in formal joint management-worker discussions on health and safety by the NIBC Employees Council.	3	 





GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
403-2	G4-LA6	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities		<p>Annual Report - Key Figures, p8-10</p> <p>In 2016, the absentee rate was 2.4% with an intensity of .92. This is a slight increase from 2015 when an absentee rate of 2.2% was reported. No onsite injuries, occupational diseases, or work-related fatalities were reported during 2016.</p>		 
403-3	G4-LA7	Workers with high incidence or high risk of diseases related to their occupation		None reported.		  
403-4	G4-LA8	Health and safety topics covered in formal agreements with trade unions		Health and safety topics are covered in formal agreements. These are collectively bargained on behalf of workers with management by NIBC's Employee Council.	3	  
Training and Education						
404-1	G4-LA9	Average hours of training per year per employee		<p>Annual Report - Key Figures, p8-10</p> <p>- Our People, p52-57</p> <p>Partially reported. NIBC reports the average training expense per employee, but not the average number of hours per employee.</p>		 





GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
404-2	G4-LA10	Programs for upgrading employee skills and transition assistance programs		Annual Report - Our People, p52-57 Internal and 3rd party training programs across a wide range of skills and interests are offered to employees by NIBC as part of the "NIBC Academy" initiative. Every employee is allocated an annual training budget which may be used for upgrading employee skills.		  
404-3	G4-LA11	Percentage of employees receiving regular performance and career development reviews		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.		 
Diversity and Equal Opportunity						
405-1	G4-LA12	Diversity of governance bodies and employees		Annual Report: Report of the Supervisory Board, p70-72 Corporate Governance, p82-83 At year end 2016, the ratio was reported to be 91% male, 9% female. Prior to year end, NIBC announced the formation of a new Executive Committee (ExCo) to take effect 1 January 2017. The composition of the ExCo will be 33% female.	6	   
405-2	G4-LA13	Ratio of basic salary and remuneration of women to men		Partially reported. See GRI 202-1. By policy, NIBC provides equal pay by gender for the same role and responsibility in the same location. These aspects are regularly reviewed to ensure pay equity.	6	   
Non-discrimination						






GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
406-I	G4-HR3	Incidents of discrimination and corrective actions taken		No incidents of discrimination were reported during 2016.	1, 2, 6	   
Freedom of Association and Collective Bargaining						
407-I	G4-HR4	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		<p>None identified during 2016.</p> <p>NIBC's policies clearly support the right to freedom of association and collective bargaining in our own operations, in our financings for clients, and for our suppliers.</p>	3	  
Child Labour						
408-I	G4-HR5	Operations and suppliers at significant risk for incidents of child labor		<p>No incidents of child labor in NIBC's own operations were reported in 2016. No incidents of child labor were reported for NIBC's suppliers during 2016.</p> <p>NIBC's policies clearly support the rights of children and human rights in our own operations, in our financings for clients, and for our suppliers.</p>	5	 
Forced or compulsory Labour						
409-I	G4-HR6	Operations and suppliers at significant risk for incidents of forced or compulsory labor		No incidents of forced or compulsory labor in NIBC's own operations were reported in 2016. No incidents of forced or compulsory labor were reported for NIBC's suppliers during 2016.	4	 
Security Practices						




GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
410-I	G4-HR7	Security personnel trained in human rights policies or procedures		<p>Security personnel contracted by NIBC have been trained in human rights policies and procedures according to our security provider's own policies.</p> <p>NIBC's security provider is also a signatory to UN Global Compact, and holds a number of third party certifications including ISO 26000, ISO 14001:2004, OHSAS 18001:2007</p>	1	
Rights of Indigenous Peoples						
411-I	G4-HR8	Incidents of violations involving rights of indigenous peoples		No incidents of violations involving rights of indigenous peoples were reported in 2016.	1, 2	 
Human Rights Assessment						
412-I	G4-HR9	Operations that have been subject to human rights reviews or impact assessments		<p>Annual Report</p> <ul style="list-style-type: none"> - At a Glance, p6-7 - Key Figures p8-10 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/ <p>By policy, all new corporate clients, corporate financings and investments of NIBC were screened for potential material human rights impacts during 2016. NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" procedures and due diligence. NIBC's approach to Human Rights is elaborated in our Human Rights Policy Supplement which was revised and strengthened in 2016.</p>	1-10	

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
412-2	G4-HR2	Employee training on human rights policies or procedures		<p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Human Rights policy, nibc.com/sustainability/sustainability-governance/ <p>NIBC provides regular training on compliance and sustainability (including human rights) to its employees. NIBC's approach to Human Rights is elaborated in our Human Rights Policy Supplement which was revised and strengthened in 2016.</p>	I-10	  
412-3	G4-HR1	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening		<p>Annual Report</p> <ul style="list-style-type: none"> - Key Figures, p8-10 <p>Website</p> <ul style="list-style-type: none"> - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ <p>By policy, all new corporate clients, corporate financings and investments of NIBC were screened for potential material human rights impacts during 2016. NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" (KYS) procedures and due diligence. The KYS procedures were updated during 2016 to include sustainability (environmental, social/human rights, and governance) screening.</p>	I-10	 
Local Communities						





GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
413-1	G4-SO1	Operations with local community engagement, impact assessments, and development programs		<p>Annual Report: - Stakeholder Engagement, p62-68</p> <p>Website - Sustainability initiatives nibc.com/sustainability/focus-areas/society/</p> <p>NIBC regularly engages with our local community in initiatives and development programs. This often is in the form of charitable initiatives by our employees in partnership with NGOs, such as those in NIBC's NGO Boulevard, or as part of collaborative initiatives in financial education, such as Week van het Geld / Global Money Week.</p>		
413-2	G4-SO2	Operations with significant actual and potential negative impacts on local communities		No significant actual and potential negative impacts of NIBC operations on local communities were reported for 2016		 
Supplier Social Assessment						
414-1	G4-LA14, G4-HR10, G4-S09	New suppliers that were screened using social criteria		<p>Annual Report - Key Figures, p8-10</p> <p>Website - Corporate Governance, nibc.com/about-us/corporate-governance/ - General purchasing and invoicing conditions, nibc.com/about-us/corporate-governance/ - Sustainability Governance, nibc.com/sustainability/sustainability-governance/ - Sustainability supplement, nibc.com/sustainability/sustainability-governance/</p> <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>	I-10	

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
414-2	G4-LA15, G4-HRI1, G4-SO10	Negative social impacts in the supply chain and actions taken		<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> <p>No negative social impacts were identified in NIBC's supply chain during 2016. Potential suppliers which did not meet sustainability criteria mentioned in NIBC's purchase conditions were rejected as a result of our KYS screening process.</p>	1, 2	
Public Policy						
415-1	G4-SO6	Political contributions		<p>NIBC made no direct political contributions during 2016. Beyond its participation in associations (GRI 102-13), NIBC does not employ or engage professional lobbyists or make direct political contributions.</p> <p>From time to time, NIBC participates in working groups on specific topics or to speak to a topic at the request of NGOs, national authorities and other stakeholders. For example during 2016, NIBC participated in a working group with national authorities, civil society and peers which collectively aimed to identify and reduce regulatory barriers to sustainability.</p>	10	 
Supplier Social Assessment						
416-1	G4-PR1	Assessment of the health and safety impacts of product and service categories		<p>Annual Report - Operational Risk, p99</p> <p>Website - Corporate Governance nibc.com/about-us/corporate-governance/</p> <p>NIBC assesses all new products and regularly reviews existing products as part of its internal NPAP (new products) and SCAP (reviews and refinements to existing products) procedures.</p> <p>These processes aim to help NIBC's business units to design and launch new products efficiently. This ensures that all issues are identified and addressed before launch and provides a clear roadmap for the design and implementation of a commercial</p>		







GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
				opportunity. These processes are also legally required under regulations such as Mifid 2, Wft, MaRisk, and KWG.		
416-2	G4-PR2	Incidents of non-compliance concerning the health and safety impacts of products and services		During 2016, no incidents of non-compliance concerning the health and safety impacts of products and services have been reported.		 
Marketing & Labeling						
417-1	G4-PR3	Requirements for product and service information and labeling		<p>NIBC adheres to all applicable rules and regulations for product information in the geographies where our products are marketed. Further, NIBC in its "Know Your Client" (KYC) processes makes further determinations according to MIFID. In the Netherlands, is implemented in the Dutch Financial Supervision Act (Wet op het financieel toezicht: Wft).</p> <p>For our NIBC Direct retail offerings, such as online saving accounts, consumer mortgages, and a buy-to-let mortgages, all terms and conditions are written in plain language and avoid small print.</p>		
417-2	G4-PR4	Incidents of non-compliance concerning product and service information and labeling		No incidents of non-compliance concerning product and service information and labeling were reported in 2016.		
417-3	G4-PR7	Incidents of non-compliance concerning marketing communications		No incidents of non-compliance concerning marketing communications were reported in 2016.		
Customer Privacy						




GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
418-I	G4-PR8	Substantiated complaints concerning breaches of customer privacy and losses of customer data		<p>Annual Report - Key Developments, p89</p> <p>No substantiated complaints were received regarding breaches of customer privacy or losses of customer data occurred in 2016.</p> <p>NIBC continues to take steps to strengthen IT security and risk management practices. This includes training to ensure increased awareness of information security, data privacy, operational risk and legal risk.</p>		
Socioeconomic Compliance						
419-I	G4-SO8	Non-compliance with laws and regulations in the social and economic area		<p>Annual Report - Key Figures, p8-10</p> <p>No incidents of non-compliance with laws and regulations in the social and economic area were reported during 2016. Furthermore, no significant fines or non-monetary sanctions were incurred.</p>		 

Additional Disclosures

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

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures.		<p>Website: Sustainability Governance, https://www.nibc.com/sustainability/sustainability-governance/</p> <p>A general sustainability training is offered to new employees annually, or more frequently depending on inflow of employees. The training provides insight in sustainability issues, environmental and social impacts of businesses, the response of the financial industry, and NIBC's approach to sustainability. The training offers general information and uses a case-study to get insight in NIBC's Sustainability Policy Framework and Toolkit applicable in our client business.</p> <p>Training on sustainability trends and developments are offered on a regular basis. Topical workshops which focus on specific issues and/or sectors are also held frequently and help to keep staff up to date on new findings, new solutions, and areas of stakeholder concern.</p> <p>On an ongoing basis, team meetings are visited by the experts of NIBC's Sustainability team for general or specific sustainability presentations/ discussions.</p>		
	GRI-FS5	Interactions with clients/ investors/ business partners regarding environmental and social risks and opportunities.		<p>Annual Report Key Figures, p8-10</p> <p>Partially reported. By policy, all corporate clients and transactions (100%) are subject to sustainability screening, however we do not report the number of companies or the percentage where further interaction has taken place.</p> <p>In cases where potential issues or opportunities are identified, NIBC interacts with clients to further discuss the issue or opportunity. For certain sectors, additional measures are implemented. For example, in the shipping sector during 2016, we interacted with clients for all potential financings as per our best efforts commitments under the Responsible Ship Recycling Standards (RSRS).</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS6	Percentage of the portfolio for business lines by specific region, size and by sector.		Annual Report At a Glance, p5 Corporate Banking, p40-41 Retail Banking, p47 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.		
	GRI-FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.		Website: Renewable Energy, NIBC NACE Supplement annualreport2016.nibc.com/ In addition to renewable energy, NIBC also supports organic & responsible food and agri. sustainable shipping, responsible Infrastructure, and sustainable commercial real estate financings and investments. However these are not yet shown in monetary value or as a percentage of the portfolio in our reporting.		   
	GRI-FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures		Annual Report Corporate Responsibility reporting scope, p332-333 Corporate Responsibility Assurance Report, p338-340 In addition to the 3rd party audit and assurance received for NIBC's Annual Report, regular internal audits are performed on key figures and the underlying environmental and social (sustainability) risk processes. For 2016, internal audit on the policies and procedures revealed no exceptions. During the 2016 external audit on corporate loans, 25% of new loans were reviewed by the auditors and no exceptions were reported.		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues.		<p>Annual Report Key Figures, p8-10</p> <p>Partially reported. By policy, all corporate clients and transactions (100%) are subject to sustainability screening, however we do not report the number of companies or the percentage where further interaction has taken place.</p> <p>In cases where potential issues are identified, NIBC interacts with clients to mitigate or avoid harm. For certain sectors, additional measures are implemented. For example, for potential financings in the shipping sector, we interact on environmental and social issues with clients of all potential financings as per our commitments under the Responsible Ship Recycling Standards (RSRS).</p>		
	GRI-FS11	Percentage of assets subject to positive and negative environmental or social screening.		<p>Annual Report Key Figures, p8-10</p> <p>By policy, all corporate clients and transactions (100%) are subject to sustainability screening.</p>		
	GRI-FS15	Policies for the fair design and sale of financial products and services		<p>All new products are required by policy to go through NIBC's new products approval procedure (NPAP). Changes to existing products are required to go through NIBC's product change procedure (SCAP).</p> <p>These operational control processes include checks to ensure fairness to clients (duty of care) and that sustainability aspects (environment, social, governance) are well-considered.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Bank NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS16	Initiatives to enhance financial literacy by type of beneficiary		<p>Annual Report Stakeholder engagement, Society at Large, p67-68</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 2016, approximately 500 students participated in money lessons led by an NIBC employee.</p> <p>NIBC employees also mentor young entrepreneurs as part of initiatives related to NIBC's Innovation Lab.</p> <p>For retail clients, NIBC offers financial counseling for clients which are in arrears. This is provided using third party services and is tailored to each client.</p>		