



# 2018 GRI Content Index

NIBC Holding N.V.



## About This Report

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

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

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

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

For 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.

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 2018 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](mailto:csr@nibc.com) or use the contact details available on our corporate website [www.nibc.com](http://www.nibc.com)

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
I02-1	Name of the organization	Core	NIBC Holding N.V.		
I02-2	Activities, brands, products, and services	Core	Annual Report - At a Glance, p5-7 - Report of the Managing Board, p20-25		
I02-3	Location of headquarters	Core	The Hague, Netherlands		
I02-4	Location of operations	Core	Annual Report, - At a glance, p5-7  NIBC holds offices in the Netherlands, Germany, the United Kingdom, and Belgium.		
I02-5	Ownership and legal form	Core	Annual Report - Letter from the CEO, p15-17 -Report of the Managing Board, p20  NIBC Holding is publicly listed at Euronext, under the ticker NIBC.AS. NIBC Bank is the most significant asset.  NIBC's legal form is N.V. ("Naamloze Vennootshap"), a type of public company which is the common form for corporates in the Netherlands.		
I02-6	Markets served	Core	Annual Report - At a Glance, p5-7 - Report of the Managing Board, p 20-25		
I02-7	Scale of the organization	Core	Annual Report - At a Glance, p5-7 - Key Figures, p12-14		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-8	Information on employees and other workers	Core	<p>Annual Report</p> <ul style="list-style-type: none"> <li>- At a Glance, p5-7</li> <li>- Key Figures, p12-14</li> <li>- Our People, p50-54</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Our 2018 Sustainability Report on our corporate website provides additional details on our employees and other workers.</p>	6	 
102-9	Supply chain	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Our place in the financial ecosystem, p24</li> <li>- Value flow, p83-84</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Our Value Chain (<a href="http://nibc.com/about-nibc/sustainability/our-value-chain/">nibc.com/about-nibc/sustainability/our-value-chain/</a>)</li> </ul> <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.</p>		 
102-10	Significant changes to the organization and its supply chain	Core	<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Letter from the CEO, p15-17</li> <li>- Report of the Managing Board, p20-25</li> <li>- Value flow, p83-84</li> </ul>		 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-11	Precautionary Principle or approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Risk Management, p57-72</li> <li>- Sustainability p79-83</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</li> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <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>	1-10	   

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-12	External initiatives	Core	<p>Annual Report - Sustainability, p79-83</p> <p>Website: - Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>) - Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>) - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p> <p>Externally-developed economic, environmental and social charters, principles, and other initiatives which NIBC endorses and applies include:</p> <ul style="list-style-type: none"> <li>Dutch Banking Code</li> <li>Dutch Corporate Governance Code</li> <li>Equator Principles (member institution)</li> <li>UN Global Compact (signatory)</li> <li>Dutch IMVO/SER banking sector covenant (signatory)</li> <li>Universal Declaration of Human Rights (by policy)</li> <li>UN Guiding Principles for Business and Human Rights (by policy)</li> <li>OECD Guidelines for Multinational Enterprises (by policy)</li> <li>ILO Core Conventions (by policy)</li> <li>UN PRI (by policy)</li> <li>UNEP FI (by policy)</li> <li>UN Convention on the Elimination of All Forms of Discrimination against Women (by policy)</li> <li>UN Declaration on the Rights of Indigenous Peoples (by policy)</li> <li>UNICEF Convention on the Rights of the Child (by policy)</li> <li>Wolfsberg Principles (by policy)</li> <li>FATF recommendations (by policy)</li> <li>Responsible Ship Recycling Standards (by policy)</li> </ul> <p>Additional external principles and charters applied by NIBC are stated in our corporate governance, compliance and sustainability policies.</p>	1-10	

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-13	Membership of associations	Core	37 NIBC employees are member of a Dutch Banking Association (NVB) or Dutch Association of Covered Bond Issuers (DACB). Paulus de Wilt is board member of the Dutch Banking Association (NVB). Herman Dijkhuizen is member of the Commission Supervision of the Dutch Banking Association (NVB).		
102-14	Statement from senior decision-maker	Core	Annual Report, - Letter from the CEO, p15-17		
102-15	Key impacts, risks, and opportunities		Annual Report, - SWOT analysis, p89 - Risk Management, p57-72 - Sustainability, p79-83  Website - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )  NIBC supports its clients to achieve their transition towards more sustainable business. The main environmental risks in NIBC's financings are climate risk and water security as a result of rising global temperatures caused by greenhouse gas emissions. The main salient human rights risks for NIBC are labour conditions and worker safety in corporate client supply chains.		    
102-16	Values, principles, standards, and norms of behavior	Core	Annual Report, - At a glance, p5-7 - CEO Letter, p15-17 - Vision & Strategy, p22-25 - Banking on Trust, p76  Website, - Vision and Principles ( <a href="http://nibc.com/about-nibc/vision-and-principles/">nibc.com/about-nibc/vision-and-principles/</a> ) - Code of Conduct, ( <a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a> )  During 2018, all employees received training on NIBC's Code of Conduct and	10	 

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I02-I7	Mechanisms for advice and concerns about ethics		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Sustainability, p79-83</li> <li>- Complaints, p356</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Grievances and complaints (<a href="http://nibc.com/about-nibc/contact-nibc/complaints-form/">nibc.com/about-nibc/contact-nibc/complaints-form/</a>)</li> <li>- Code of Conduct (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</li> <li>- Whistleblowing (<a href="http://nibc.com/about-nibc/corporate-governance/compliance/">nibc.com/about-nibc/corporate-governance/compliance/</a>)</li> </ul> <p>NIBC offers an online complaints and grievance mechanism on its website. Internal whistleblowing procedures are available to employees on NIBC's intranet. These mechanisms are included in guidance provided to employees for NIBC's Code of Conduct.</p> <p>NIBC's whistleblowing policy was updated during 2017. 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 2018, ensuring our approach continues to follow best practices.</p> <p>During 2018, 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</p>	10	 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			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.		
102-18	Governance structure	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Report of the Supervisory Board, p71-84</li> <li>- Corporate Governance, p85-88</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</li> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul>		 
102-19	Delegating authority		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Report of the Supervisory Board, p71-84</li> <li>- Corporate Governance, p85-88</li> <li>- Sustainability p79-83</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</li> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <p>NIBC has appointed a Senior Sustainability Officer to be responsible for sustainability and corporate social responsibility who reports directly to the Executive Committee for these topics.</p>		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-20	Executive-level responsibility for economic, environmental, and social topics		<p>Annual Report - Sustainability p79-83</p> <p>Website - Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</p> <p>NIBC's Executive Committee is responsible for economic, environmental and social topics. Sustainability matters are monitored and reported periodically to the ExCo and the Risk Policy &amp; Compliance Committee (RPCC), a subcommittee of NIBC's Supervisory Board.</p> <p>This is transparent publicly. For example, NIBC's Chief Risk Officer has signed 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: - Sustainability p79-83</p> <p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>) - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>) - Stakeholders: (<a href="http://nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/">nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/</a>)</p> <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>		     

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102-29	Identifying and managing economic, environmental, and social impacts		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Non-financial reporting, p81-82</li> <li>- Stakeholder engagement, p83-85</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <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 &amp; Compliance Committee (RPCC), a subcommittee of NIBC's Supervisory Board.</p> <p>Stakeholders are regularly consulted to identify and prioritize the issues which are most material and the potential material and salient impacts, risks, and opportunities. These are mentioned in the risk management section of our Annual Report and elaborated in NIBC's materiality assessment.</p>		    
102-30	Effectiveness of risk management processes		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- At a Glance, p5-7</li> <li>- Key Figures, p12-14</li> <li>- Non-financial reporting, p81-82</li> </ul> <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 2018, 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</p>		  

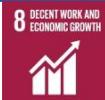
GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>objectives to increase building resource efficiency in line with 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>		
102-31	Review of economic, environmental, and social topics		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- How we manage sustainability, p80</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <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 &amp; 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"> <li>- Supervisory Board, p78</li> <li>- Corporate responsibility reporting scope, p313</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <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</p>		

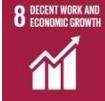
GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>and how we are creating and sustaining value.</p> <p>The Annual Report is drawn up by the Managing Board and reviewed and approved by our Supervisory Board.</p>		
I02-33	Communicating critical concerns		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- How we manage sustainability, p80</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Concerns are communicated in a variety ways depending on the nature, materiality and severity of the concerns. This includes direct discussions with the Executive Committee, reports and presentations to the Executive Committee and subcommittees of the Supervisory Board, stakeholder meetings, engagement with the Sustainability team, and communications with clients.</p>		
I02-34	Nature and total number of critical concerns		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Non-financial reporting, p81-82</li> </ul> <p>During 2018 no severe environmental or human rights incidents related to NIBC's financings, own operations, and supply chain were reported.</p> <p>The main environmental risks in NIBC's financings are climate risk and water security as a result of rising global temperatures caused by greenhouse gas emissions.</p> <p>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>		

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102-35	Remuneration policies		<p>Annual Report, - Remuneration report, p110-115</p> <p>Website - Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>) - Compliance with Banking Code, p6 (<a href="http://nibc.com/about-nibc/corporate-governance/governance-codes/">nibc.com/about-nibc/corporate-governance/governance-codes/</a>)</p> <p>The Supervisory Board reviewed and amended NIBC's remuneration policy in 2018. 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>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> <p>Whether or not an employee actually receives a variable compensation for his or her performance, is wholly discretionary and depends on the overall financial and non-financial performance of the bank, of the respective business unit, personal performance and relevant market levels of remuneration. Employees do not qualify for variable remuneration if their performance has been inadequate or</p>		 

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			<p>poor, if they have failed to meet duty-of-care or compliance requirements, if they have displayed behaviour contrary to NIBC's policies and corporate values, or if they were subject to disciplinary action.</p>		
I02-36	Process for determining remuneration		<p>Annual Report, - Remuneration p80-84</p> <p>Website - Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/supervisory-board/">nibc.com/about-nibc/corporate-governance/supervisory-board/</a>) - Compliance with Banking Code, p6 (<a href="http://nibc.com/about-nibc/corporate-governance/governance-codes/">nibc.com/about-nibc/corporate-governance/governance-codes/</a>)</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>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>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> <p>Whether or not an employee actually receives a variable compensation for his or her performance, is wholly discretionary and depends on the overall financial and</p>		 

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102-37	Stakeholders' involvement in remuneration		<p>Annual Report, - Remuneration p110-115</p> <p>Views from stakeholders on our remuneration policy are received as part of our regular stakeholder dialogues and are considered in the remuneration process.</p> <p>Their influence is visible in our control framework which ensures that remuneration practices do not result in incentivising and / or rewarding excessive risk taking which could lead to the actions or lack of actions as defined in the risk tolerance statements, as well as unwanted behaviors relating to market conduct, reputational risks, etc.</p> <p>NIBC also benchmarks its remuneration with the financial sector. For example, in 2018, the Remuneration and Nominating Committee (RNC) of the Supervisory Board thoroughly reviewed the Managing Board remuneration. Hereby it took into account all relevant benchmarks, such as the hybrid benchmark peer group in the relevant environment for NIBC, as well as a benchmark regarding the post-employment benefits. The benchmark of Dutch banks was also explicitly included in the assessment, in view of the recent developments with regard to salary and variable income.</p> <p>Furthermore, the framework ensures that NIBC's remuneration policies and practices do not lead to reward for failure, amongst others by ensuring that any performance which is rewarded, is aligned with NIBC's strategy and business objectives, taking due account of the defined risk tolerances and conduct fitting for NIBC.</p>		 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-38	Annual total compensation ratio		<p>Annual Report, - Remuneration p 114</p> <p>In line with the Dutch Corporate Governance Code, NIBC discloses the relevant elements related to the internal pay ratios. In 2018 the base salary pay ratio of the CEO (EUR 825,000) compared to the median full-time salary of all employees (EUR 77,775) was 11 (2017: 10).</p>		 
102-39	Percentage increase in annual total compensation ratio		<p>Annual Report, - Remuneration p 114 - Remuneration expenses, p277</p> <p>In line with the Dutch Corporate Governance Code, NIBC discloses the relevant elements related to the internal pay ratios. In 2018 the base salary pay ratio of the CEO (EUR 825,000) compared to the median full-time salary of all employees (EUR 77,775) was 11 (2017: 10). These ratios exclude deferred compensation such as pension and other elements.</p>		 
102-40	List of stakeholder groups	Core	<p>Annual Report: - Stakeholder engagement, p83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>) - Stakeholders: (<a href="http://nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/">nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/</a>)</p> <p>NIBC's stakeholder groups include corporate and retail customers, employees, shareholders, rating agencies, equity &amp; debt investors, civil society organizations, regulators and authorities, business partners (suppliers), and press and media.</p>		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-41	Collective bargaining agreements	Core	<p>Annual Report: - Works Council, p54</p> <p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p> <p>100% of NIBC's employees are represented in formal discussions with management by a representative body, the NIBC Works Council.</p> <p>All staff are informed of any agreed changes and regularly updated by the Works Council on discussions and developments. The current employee benefit scheme was negotiated and agreed by NIBC with the Employees Council. The prior collective bargaining agreement ended per 1 January 2014. Through our human rights policy, NIBC also supports the right of workers to collective bargaining in our financings and investments and with suppliers.</p>	3	  
102-42	Identifying and selecting stakeholders	Core	<p>Annual Report: - Stakeholder engagement, p83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>) - Stakeholders: (<a href="http://nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/">nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/</a>)</p> <p>For 2018, our stakeholder consultation was performed across a range of stakeholder groups representing our clients, investors, regulators, civil society and employees. One significant change from recent years was a result of NIBC's Initial Public Offering (IPO) in 2018. This has added new equity shareholder voices among the diverse stakeholders with whom we engage.</p>		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-43	Approach to stakeholder engagement	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Employee Engagement, p73-74</li> <li>- Works Council, p77-78</li> <li>- Stakeholder engagement, p83-86</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> <li>- Stakeholders: (<a href="http://nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/">nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/</a>)</li> </ul> <p>Throughout 2018 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. Further, NIBC was active in in numerous sectoral and topical fora related to the business and potential impacts of the company.</p> <p>In 2018 we held an Employee Experience Survey to find out how our employees rate our culture, our leadership and their work experience by measuring the levels of engagement and commitment in our organisation. High participation (79%) in the survey provided solid insights, which led to the identification of the organisation's strengths and opportunities.</p>		
102-44	Key topics and concerns raised	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Stakeholder Engagement, p83-86</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> <li>- Stakeholders: (<a href="http://nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/">nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/</a>)</li> </ul> <p>Key topics and concerns raised by stakeholder groups are catalogued in our annual Materiality Assessment and summarized in our annual report.</p>	1	

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-45	Entities included in the consolidated financial statements	Core	<p>Annual Report - Principal Subsidiaries and associates, p267</p> <p>The NIBC Holding N.V. Annual Report 2018 reports on the activities of NIBC Holding N.V., including all international offices, and subsidiaries which have been established by NIBC for our business purposes.</p>		
102-46	Defining report content and topic Boundaries	Core	<p>Annual Report: - Corporate Responsibility Reporting Scope, p351 -352</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>) - Stakeholders: (<a href="http://nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/">nibc.com/about-nibc/sustainability/our-value-chain/stakeholders/</a>)</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, p83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</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.		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-49	Changes in reporting	Core	In 2018, NIBC launched a detailed Sustainability Report to replace smaller, separate environment and people supplements which had been published in prior years. Importantly, the Report includes a section on Human Rights aligned to the UN Guiding Principles on Business and Human Rights (UNGPs) Reporting Framework.		
102-50	Reporting period	Core	This GRI Content Index is for the full year 2018, from 01-01-2018 until 31-12-2018.		
102-51	Date of most recent report	Core	Our prior report was published March 2018, for the period 01-01-2017 until 31-12-2017		
102-52	Reporting cycle	Core	Annual from 1 January to 31 December.		
102-53	Contact point for questions regarding the report	Core	Annual Report - Contact information, p356  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 <a href="mailto:csr@nibc.com">csr@nibc.com</a>		
102-54	Claims of reporting in accordance with the GRI Standards	Core	Annual Report: - Corporate Responsibility Reporting Scope, p351-352  NIBC has prepared its report in accordance with the latest GRI Standards, core option.  For 2018, we have continued to provide additional disclosures beyond GRI's base requirement for core in order to provide greater transparency for readers and stakeholders.		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
102-55	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, p351 -352</p> <p>The non-financial key figures and the related processes have been audited by NIBC's internal auditors. No exceptions were reported. These figures were not externally audited in 2018.</p> <p>Our carbon footprint (Scope 1 and 2) has been independently calculated for NIBC using tools provided by Climate Neutral Group, a social venture that was established in 2002 by Stichting Doen.</p>	I, 10	 
103-1	Explanation of the material topic and its Boundary	Core	<p>Material Topic: Transparency</p> <p>Annual Report: - Stakeholder Engagement p 83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</p> <p>NIBC's stakeholders have indicated that transparency is highly important to them. Our stakeholders view transparency as a foundation for trust. Therefore this is a material topic for NIBC.</p> <p>The boundary and scope for transparency is broad in that different stakeholders prefer transparency around topics that they are most interested in. At the same time all stakeholders recognise the principles of reasonableness and proportionality, Therefore NIBC must work to balance these different views and focus on those aspects which of the most common interest.</p>		 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
103-2	The management approach and its components	Core	<p>Annual Report: - Stakeholder Engagement p 83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</p> <p>As a professional, entrepreneurial and inventive financial partner, we look to build long-term relationships that are based on trust, transparency and reliability.</p> <p>We report financial and non-financial information publicly as part of our Annual Report and other disclosures. We commit to adhering to international standards in our financial and non-financial reporting.</p> <p>NIBC also engages with stakeholders in regard to economic, human rights, environmental, and other related matters. Importantly their views inform our business strategy and guide our policies and practices.</p>		
103-3	Evaluation of the management approach	Core	<p>Annual Report: - Our People, p73-78 - Stakeholder Engagement p 83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</p> <p>NIBC has continued to increase our reporting and increase our transparency that we provide in regard to topics and indicators that are important to our stakeholders.</p> <p>Our Annual Report, Pillar III, NACE Supplement, GRI Content Index, and Sustainability Report are clear examples of our approach.</p>		
103-1	Explanation of the material topic and its Boundary	Core	<p>Topic: Product Responsibility</p> <p>Annual Report: - Key Figures, 12-14 - Non financial reporting, p 81-82</p>		 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>- Stakeholder engagement, p83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</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>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>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 - Non financial reporting, p 81-82 - Stakeholder engagement, p83-86</p> <p>Website: - Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</p> <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 our annual report we mention our efforts to actively inform our clients about the terms and conditions of an interest-only mortgage. Upon maturity the full</p>		

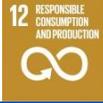
GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>mortgage loan needs to be refinanced or repaid and research has shown that not all of our clients may be fully prepared for this. NIBC is fully committed to resolve these issues together with our clients. As a first step we will start contacting the most vulnerable clients in 2019 about possible personalised solutions. This effort is in coordination with the Dutch Banking Association (NVB) and the AFM.</p>		
I03-3	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Key Figures, 12-14</li> <li>- Non financial reporting, p 81-82</li> <li>- Stakeholder engagement, p83-86</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> </ul> <p>Product responsibility is best evaluated over both the short and the long term, NIBC continues to earn high score in terms of NPS and other customer surveys, a trend which has continued for a number of years. We actively aim to protect the financial system and our clients.</p> <p>In our annual report we mention our efforts to actively inform our clients about the terms and conditions of an interest-only mortgage. Upon maturity the full mortgage loan needs to be refinanced or repaid and research has shown that not all of our clients may be fully prepared for this. NIBC is fully committed to resolve these issues together with our clients. As a first step we will start contacting the most vulnerable clients in 2019 about possible personalised solutions. This effort is in coordination with the Dutch Banking Association (NVB) and the AFM.</p>		
I03-1	Explanation of the material topic and its Boundary	Core	<p>Topic: Client Satisfaction</p> <p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Key Figures, 12-14</li> <li>- Non financial reporting, p 81-82</li> <li>- Stakeholder engagement, p83-86</li> </ul> <p>Website:</p>		 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>- Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</p> <p>Stakeholders have indicated that client satisfaction is a highly important aspect as it can be seen as an indication of future financial and non-financial performance. Therefore it is a material aspect for NIBC</p> <p>The primary measurements of client satisfaction used by NIBC are NPS score for corporate banking and the client satisfaction survey results for NIBC Direct. Though not reported in specific metrics, we also closely monitor feedback received across all communication channels.</p>		
I03-2	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>		
I03-3	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- At a Glance, p5-7</li> <li>- Key Figures, p12-14</li> <li>- Performance Evaluation, p87-88</li> </ul> <p>A performance evaluation is provided which measures NIBC's performance during 2018 against the strategic priorities as described in our 2017 Annual Report.</p>		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
201-1	Direct economic value generated and distributed		<p>Annual Report,            - At a Glance, p5-7            - Key Figures, p12-14            - Consolidated financial statements   19-324</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	Financial implications and other risks and opportunities due to climate change		<p>Annual Report            - Letter from the CEO, p16            - Sustainability, p81-82            - SWOT Analysis, p89-91</p> <p>Based on NIBC's stated strategy, current portfolio and the other influences within the world around us, the financial implications due to climate change in the short term are limited.</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>	7	 
201-3	Defined benefit plan obligations and other retirement plans		<p>Annual Report,            - Pension and Benefits, p77            - Remuneration report, p110-115            - Note 43 Employee benefit obligations, p231-232</p> <p>Similarly, our pension plan is a collective-defined contribution (CDC) scheme for salaries up to EUR 105,075, ensuring that pension costs have become predictable.</p>		 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			As of 2018 the contribution for NIBC is determined at 26.2% and the contribution of the employee at 4.2%, whilst the gross contribution by NIBC for pensions above the fiscal maximum is set at 25% for all ages.		
201-4	Financial assistance received from government		<p>NIBC does not receive any financial assistance from the government for its own benefit.</p> <p>From time to time and for the benefit of our clients, NIBC does partner with governmental authorities for the benefit of clients or to co-invest in our clients.</p>		 
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		<p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p> <p>The ratio of standard entry level wages at NIBC is x2.32 on average (x2.31 for men, x2.35 for women) in 2018. By policy roles and responsibilities are compensated equally at NIBC.</p> <p>Entry level roles within NIBC vary by department, role and responsibility level. This does result in minor statistical differences by gender.</p>	6	   
202-2	Proportion of senior management hired from the local community		100% of new senior management hires during 2018 were made from the countries where they are based.		
203-1	Infrastructure investments and services supported		<p>Annual Report, - Portfolio, p13 - Sale of fund investments, p29 - Corporate client offering, p48</p> <p>Website - NACE supplement, (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>) - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p>		   

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>Within our Infrastructure &amp; Renewables portfolio we used to finance traditional infrastructure objects with a long maturity. While we continue to serve our clients and help them throughout their business cycle, we are shifting towards more digital infrastructure projects such as financing data centres and glass fibre networks, with relatively shorter tenors compared to the traditional infrastructure portfolio.</p>		
203-2	Significant indirect economic impacts		<p>Annual Report,            - General Developments and performance, p21            - Corporate client offering, p48-50            - Developments in risk management, p58-59            - Sustainable development goals, p79</p> <p>Significant indirect economic impacts are mentioned throughout our Annual Report.</p>	7, 8	 
205-1	Operations assessed for risks related to corruption		<p>Annual Report            - Anti-corruption, p60-61</p> <p>NIBC takes a comprehensive approach to mitigate risks related to corruption.</p> <p>For example, all staff received mandatory training during 2018 in regard to NIBC's updated Code of Conduct and compliance policies. Furthermore all corporate clients and transactions are assessed for risks related to corruption as part of NIBC's due diligence processes. Appropriate assessments are also made as part of KYC processes for Retail Banking. Assessments are also performed for suppliers of services to NIBC.</p>	10	 
205-2	Communication and training about anti-corruption policies and procedures		<p>Annual Report            - Anti-corruption, p60-61</p> <p>Communication and training about anti-corruption are part of NIBC's regular compliance, ethics, and sustainability trainings.</p>	10	 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			During 2018, 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.		
205-3	Confirmed incidents of corruption and actions taken		Annual Report - Anti-fraud, p60-61  No incidents of fraud, bribery or corruption were reported for 2018.	10	 
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		Annual Report - Key Figures, p12-14  No legal actions for anti-competitive behavior, anti-trust and monopoly practices were reported for 2018.	10	
301-1	Materials used by weight or volume		Website - Sustainability Report (nibc.com/about-nibc/sustainability/)	8	 
301-2	Recycled input materials used		Website - Sustainability Report (nibc.com/about-nibc/sustainability/)	8	 
301-3	Reclaimed products and their packaging materials		Website - Sustainability Report (nibc.com/about-nibc/sustainability/)	8	 
302-1	Energy consumption within the organization		Annual Report - Environmental sustainability and natural capital, p81  Website - Sustainability Report (nibc.com/about-nibc/sustainability/)	8	 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			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 - Environmental sustainability and natural capital, p81</p> <p>Website: - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>) - Sustainability Policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>) - Environment Policy Supplement (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</p> <p>NIBC does not fully report indirect energy consumption, for example as related to our supply chain or our financings. We aspire to report on the energy efficiency of our corporate lending portfolio in a future report.</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>	8	  
302-3	Energy intensity		<p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p> <p>Energy intensity is reported in NIBC's sustainability Report.</p>	8	  

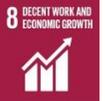
GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
302-4	Reduction of energy consumption		<p>Annual Report - Environmental sustainability and natural capital, p81</p> <p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p> <p>Energy performance and ratings of our offices are reported in our Sustainability Report. Improvements and renovations conducted during 2018 have led to an upgrade in energy rating in our headquarters in the Hague to A from B.</p>	8	   
302-5	Reductions in energy requirements of products and services		<p>Annual Report - Environmental sustainability and natural capital, p81</p> <p>Website: - Sustainability Policies (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</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 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>	8	   

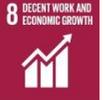
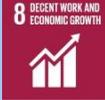
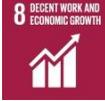
GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
303-1	Water withdrawal by source		<p>Website - Sustainability Report (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>	8	  
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>	8	  
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>	8	  
304-2	Significant impacts of activities, products, and services on biodiversity		<p>Annual Report - Environment and natural capital, p81</p> <p>During 2018, no severe environmental incidents including significant impacts on biodiversity related to NIBC's financings, own operations or supply chain were reported. NIBC screens potential clients and financings for biodiversity risks as part of its client and transaction due diligence processes.</p> <p>During 2018, NIBC installed a bee hotel at its headquarters in the Hague and Beequip supported "Honey Highway", an initiative which aims to increase suitable habitat for dwindling wild honey bee populations in the Netherlands.</p>	8	  

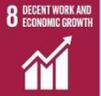
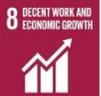
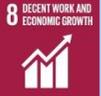
GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
304-3	Habitats protected or restored		<p>Annual Report - Environmental sustainability and natural capital p81-82</p> <p>Website: - Sustainability Policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>) - Environment Policy Supplement (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</p> <p>NIBC performs sustainability due diligence for all clients and transactions in order to protect sensitive marine and land habitats and avoid harmful biodiversity impacts.</p>	8	  
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations		<p>Annual Report - Environment and natural capital, p81-82</p> <p>Website: - Sustainability Policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>) - Environment Policy Supplement (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</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 2018. Furthermore there have been no material adverse environmental impacts reported to NIBC in regard to its financings and investments during 2018.</p> <p>By policy, NIBC performs due diligence in regard to new corporate clients and transactions to avoid potential negative impacts on IUCN Red List species, national conservation list species and sensitive land or marine habitats.</p>	8	  
305-1	Direct (Scope 1) GHG emissions		<p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p>	8	 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
305-2	Energy indirect (Scope 2) GHG emissions		Website - Sustainability Report (nibc.com/about-nibc/sustainability/)	8	 
305-3	Other indirect (Scope 3) GHG emissions		Website - Sustainability Report (nibc.com/about-nibc/sustainability/)  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.	8	  
305-4	GHG emissions intensity		Website - Sustainability Report (nibc.com/about-nibc/sustainability/)	8	  
305-5	Reduction of GHG emissions		Annual Report - Non-financial reporting, p81 - Environment and natural capital, p81-82  Website - Sustainability Report (nibc.com/about-nibc/sustainability/)  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.  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.	8	  

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			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.		
307-I	Non-compliance with environmental laws and regulations		<p>Annual report</p> <ul style="list-style-type: none"> <li>- Key figures, p14</li> <li>- Environment and natural capital, p81-82</li> </ul> <p>No incidents of non-compliance with environmental or other laws and regulations were reported for 2018. Further, during 2018, 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>	7, 8	   
308-I	New suppliers that were screened using environmental criteria		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- How we manage sustainability, p80</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- General purchasing and invoicing conditions (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</li> </ul> <p>NIBC screens new and existing suppliers against sustainability / ESG criteria using its internal know your supplier ("KYS") procedure.</p>	7, 8	  
308-2	Negative environmental impacts in the supply chain and actions taken		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- How we manage sustainability, p80</li> </ul> <p>NIBC screens clients and suppliers against sustainability (human rights, environmental, and governance) criteria using its sustainability internal know your</p>	7, 8	 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>supplier ("KYS") processes and procedure.</p> <p>No material adverse environmental impacts or incidents were reported regarding NIBC's supply chain during 2018. 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 2018. 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"> <li>- Highlights, p8</li> <li>- Key Figures, p14</li> <li>- Recruitment, p75-76</li> </ul> <p>Sustainability Report</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul>		  
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>		  
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>		 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			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].		
402-1	Minimum notice periods regarding operational changes		Annual Report - Health and Safety, p54 - Works Council, p54-55  NIBC complies with the statutory requirements for operational changes in each of its operating locations.		  
403-1	Workers representation in formal joint management-worker health and safety committees		Annual Report Health and Safety, p54 Works Council, p54-55  All workers are represented in formal joint management-worker discussions on health and safety by the NIBC Works Council.	3	   
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities		Annual Report - Key Figures, p14 - Employee base, p73  Absenteeism remained low at 2.1% in 2018, a further decrease from 2017 (2.2%). Absenteeism frequency decreased to 0.8 (2017: 1.0).  No work-related fatalities severe onsite injuries, or occupational diseases were reported during 2018 (2017: 0).		   

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
403-3	Workers with high incidence or high risk of diseases related to their occupation		For 2018, no high incidence or high risk of diseases related to occupation were found. (2017: 0).		   
403-4	Health and safety topics covered in formal agreements with trade unions		<p>Annual Report - Works Council, p54-55</p> <p>Health and safety topics are covered in formal agreements. These are collectively bargained on behalf of workers with management by NIBC's Works Council, our employee representative body</p>	3	   
404-1	Average hours of training per year per employee		<p>Annual Report - Key Figures, p14 - Our People, p73-78</p> <p>Partially reported. NIBC reports the average training expense per employee, but not the average number of hours per employee.</p> <p>The 2018 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 2017 (EUR 2,300) mainly due to the introduction of a personal development budget for all staff, enabling and motivating them to further develop themselves and by this also contribute to their employability. Moreover, these investments increase the professional capabilities and competences of our people.</p>		   

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
404-2	Programs for upgrading employee skills and transition assistance programs		<p>Annual Report - Our People, p73-78</p> <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>Annual Report - Our People, p73-78</p> <p>All employees receive annual performance and career development reviews, except employees who joined shortly before the review process commences, or who will leave the company during the process.</p>		
405-1	Diversity of governance bodies and employees		<p>Annual Report: - Highlights, p8 - Key Figures, p14 - Our People, p76-77</p> <p>We realise that improving diversity ratios is a long-term process and will continue to strive to meet our ambitions. We have a Diversity Committee in place which is tasked with researching our current behaviours and recommending ways to achieve a more inclusive environment at NIBC.</p> <p>Increasing diversity among senior managers was a key focus area in 2018. Our objective is at least one third of our Supervisory Board and Managing Board members to be female. NIBC will continue to address this topic as 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> <p>In terms of gender diversity, at year end 2018 NIBC's Supervisory Board was 29%</p>	6	

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>female, 71% male. NIBC's Executive Committee was 33% female, 77% male. The ratio for all senior management improved to 15% female, 85% male for 2018, which compares to 12% female and 88% male in 2017, 9% female and 91% male in 2016.</p> <p>Diversity across age segments continued to show balance in 2018. 19% of our employees were under 30 years of age (2017: 18%) and 23% of employees were age 50 or older (2017: 23%).</p>		
405-2	Ratio of basic salary and remuneration of women to men		<p>Overall basic salary by level: Professional Support 0.84; Analyst 1.00, Associate 1.05, Vice President 1.15, Associate Director 1.09, Director 1.01, Managing Director 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>	6	   
406-1	Incidents of discrimination and corrective actions taken		<p>Website</p> <ul style="list-style-type: none"> <li>- NIBC Code of Conduct, (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</li> <li>- Sustainability Governance, (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Human Rights policy, (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <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>	1, 2, 6	   

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			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 2018.		
407-I	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		<p>Website: - Human Rights Policy Supplement, <a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a></p> <p>No operations or suppliers were identified where these rights might be significantly at risk in NIBC's due diligence and monitoring during 2018.</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>	3	  
408-I	Operations and suppliers at significant risk for incidents of child labor		<p>Website - Sustainability Governance, (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</p> <p>- Human Rights policy, (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</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 2018.</p>	5	 

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>NIBC's 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-I	<p>Operations and suppliers at significant risk for incidents of forced or compulsory labor</p>		<p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Governance, (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Human Rights policy, (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <p>Due to the nature of our business, since NIBC's suppliers are located near our operations in Northwest Europe and since local and national regulations are strong, significant risks are seen to be low though NIBC is alert to these potential risks.</p> <p>No operations or suppliers were identified to be significantly at risk in NIBC's due diligence and monitoring during 2018.</p> <p>NIBC's sustainability and procurement policies clearly protect the rights of children, respecting and protecting human rights in our own operations, in our financings for clients, and with our suppliers.</p>	4	
410-I	<p>Security personnel trained in human rights policies or procedures</p>		<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 2018, also in 2017.</p> <p>Security personnel contracted by NIBC have been trained in human rights policies and procedures according to our security provider's own policies.</p> <p>NIBC's security provider is also a signatory to UN Global Compact, and holds a number of third party certifications including ISO 26000, ISO 14001:2004, OHSAS 18001:2007</p>	1	

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
411-1	Incidents of violations involving rights of indigenous peoples		<p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Human Rights policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <p>No incidents of violations involving rights of indigenous peoples were reported in 2018 as related to NIBC's financings, our operations or our supply chain.</p> <p>Due diligence was performed for this aspect as part of NIBC's integrated sustainability assessments of corporate clients and transactions and in our supplier due diligence process. During 2018, NIBC was also active in national and sectoral dialogues on land rights and FPIC.</p>	1, 2	
412-1	Operations that have been subject to human rights reviews or impact assessments		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- At a Glance, p5-7</li> <li>- Key Figures p12-14</li> <li>- Sustainability, p79-83</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Human Rights policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <p>By policy, all new corporate clients, corporate financings and investments of NIBC were screened for potential material human rights impacts during 2018. 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.</p>	1-10	
412-2	Employee training on human rights policies or procedures		<p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Human Rights policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul>	1-10	

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>governance/)</p> <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"> <li>- Key Figures, p14</li> <li>- Sustainability, p79-83</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <p>By policy, all new corporate clients, corporate financings and investments of NIBC were screened for potential material human rights impacts during 2018. NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" (KYS) procedures and due diligence.</p>	1-10	 
413-1	Operations with local community engagement, impact assessments, and development programs		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Non-financial reporting, p81-83</li> <li>- Sustainability, p79-83</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability initiatives (<a href="http://nibc.com/about-nibc/sustainability/focus-areas/society/">nibc.com/about-nibc/sustainability/focus-areas/society/</a>)</li> </ul> <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 2018 included joint initiatives with civil society organisations in</p>		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			NIBC'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.		
413-2	Operations with significant actual and potential negative impacts on local communities		<p>Annual Report</p> <p>- Non-financial reporting, p81-83</p> <p>No significant actual or potential negative impacts of NIBC operations or financings/investments on local communities were reported for 2018.</p>		 
414-1	New suppliers that were screened using social criteria		<p>Annual Report</p> <p>- Business Units, p80-81</p> <p>Website</p> <p>- Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</p> <p>- General purchasing and invoicing conditions, (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</p> <p>- Sustainability Governance, (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</p> <p>- Sustainability Report, (<a href="http://nibc.com/about-nibc/sustainability/sustainability/">nibc.com/about-nibc/sustainability/sustainability/</a>)</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>	1-10	
414-2	Negative social impacts in the supply chain and actions taken		<p>Annual Report</p> <p>- Non-financial reporting, p81-83</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</p>	1, 2	

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
			<p>regarding NIBC's supply chain during 2018. Potential suppliers which did not meet the sustainability criteria mentioned in NIBC's purchase conditions were rejected during our procurement process.</p> <p>No severe negative social impacts (incl human rights) or incidents were reported related to supply chains of clients financed by NIBC during 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-I	Political contributions		<p>EUR 0. NIBC made no direct political contributions during 2018 (2017: EUR 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>	10	 
416-I	Assessment of the health and safety impacts of product and service categories		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risk Policy &amp; Compliance Committee, p98-99</li> <li>- Operational Risk, p71</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>)</li> </ul> <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>		

GRI Standard Number	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle (where appropriate)	Related SDGs (where appropriate)
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		<p>Annual Report -Our People, p73-78 - Non-financial reporting, p81</p> <p>During 2018, no incidents of non-compliance concerning the health and safety impacts of products and services were reported.</p>		 
417-1	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	Incidents of non-compliance concerning product and service information and labeling		<p>No incidents of non-compliance concerning product and service information and labeling were reported in 2018.</p>		
417-3	Incidents of non-compliance concerning marketing communications		<p>No significant incidents of non-compliance concerning marketing communications were reported in 2018.</p>		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data		<p>Annual Report - Client privacy &amp; data security, p50</p> <p>During 2018, there were no severe leaks, thefts, or losses of customer data nor any complaints regarding breaches of customer privacy and losses of customer data. NIBC reported 18 data security incidents during the year to authorities and clients.</p>		

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<p>NIBC continues to take steps to strengthen data security and risk management practices. This includes training to ensure increased awareness of information security, data privacy, operational risk and legal risk. In 2018 we carried out a large number of tests, continuously assessing our data protection measures, as part of our efforts to strengthen NIBC's cyber security.</p>					
419-I	Non-compliance with laws and regulations in the social and economic area		<p>Annual Report - Key Figures, p12-14</p> <p>One significant fine was incurred during 2018. NIBC defines significant fines to be those exceeding ten thousand euros received from a regulator or authority (see definitions on p354 of our Annual Report). No other significant non-monetary sanctions were reported.</p>		 

## Additional Disclosures

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS1	Policies with specific environmental and social components applied to business lines.		<p>Annual Report - Sustainability, p79-86</p> <p>Website: - Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/">nibc.com/about-nibc/corporate-governance/</a>) - Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</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, p79-86</p> <p>Website: - Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</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 - Sustainability, p79-86</p> <p>Website: - Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</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 Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures.		<p>Annual Report - Sustainability, p79-86</p> <p>Website: - Sustainability Governance (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</p> <p>During 2018, 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 provides insight in sustainability issues, environmental and social impacts of businesses, the response of the financial industry, and NIBC's approach to sustainability. The training offers general information and uses a case-study to get insight in NIBC's Sustainability Policy Framework and Toolkit applicable in our client business.</p> <p>Training on sustainability trends and developments are offered on a regular basis. Topical workshops which focus on specific issues and/or sectors are also held frequently and help to keep staff up to date on new findings, new solutions, and areas of stakeholder concern.</p> <p>On an ongoing basis, team meetings are visited by the experts of NIBC's Sustainability team for general or specific sustainability presentations/ discussions.</p>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
	GRI-FS5	Interactions with clients/ investors/ business partners regarding environmental and social risks and opportunities.		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Key Figures, p5-7</li> <li>- Stakeholder Engagement, p61 -67</li> <li>- Sustainability, p79-86</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Materiality Assessment (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> </ul> <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"> <li>- At a Glance, p5-7</li> <li>- Corporate Clients, p48-51</li> <li>- Retail Clients, p51-54</li> <li>- Equity Exposure, p69</li> <li>- Operating Income per sector per country, p176</li> <li>- Corporate Loan Exposure, p282</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Capital Markets Update, (<a href="http://nibc.com/about-nibc/investor-relations/equity-investors/capital-markets-update/">nibc.com/about-nibc/investor-relations/equity-investors/capital-markets-update/</a>)</li> <li>- NACE supplement, (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> </ul>		

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
				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.		
	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"> <li>- Renewable Energy, NACE supplement, (<a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <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"> <li>- Corporate Responsibility reporting scope, p35 I</li> </ul> <p>Internal audits are performed on key figures and the underlying environmental and social (sustainability) risk processes. For 2018, no external 3<sup>rd</sup> party audit was performed. The internal audit revealed no significant exceptions.</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"> <li>- Key Figures, p14</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Partially reported. By policy, all corporate clients and transactions (100%) are subject to sustainability screening, NIBC also reports the number of higher sustainability risk transactions the bank has considered during the year as a non financial key figure.</p> <p>However we do not report the overall number of companies or the</p>		     

GRI Standard Number	GRI G4 Reference	Disclosure Title	Required for CORE	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Related UN GC Principle	Related SDGs (where appropriate)
				<p>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, p14</p> <p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p> <p>By policy, all corporate clients and transactions (100%) are subject to a sustainability assessment (screening). This process includes environmental, human rights and governance aspects.</p>		  
	GRI-FS15	Policies for the fair design and sale of financial products and services		<p>Annual Report - Risk Policy &amp; Compliance Committee, p 99</p> <p>Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</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 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 Holding 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</p> <ul style="list-style-type: none"> <li>- NIBC NGO Boulevard, p85-86</li> <li>- Community Engagement, p 86</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <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 2018, approximately 700 students participated in money lessons led by an NIBC employee.</p> <p>As part of a financial education initiative NIBC's 2018 Talent Program, NIBC supported a series of financial education classes for local secondary school students from disadvantaged backgrounds.</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>		 