

# 2020 NIBC GRI CONTENT INDEX

March 2021

## About this report

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

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

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

In addition to references to our Annual Report or other disclosures, where possible we also provide references to our policies. We believe this linkage between policies and results provides clarity in terms of the effectiveness of our approach. Readers may also refer to the EU Directive 2014/95/EU Index which is found on pages 347-349 in our Annual Report.

For increased clarity, we provide direct descriptive responses for many indicators in addition to page references for our Annual Report and links to other publications. We have also provided responses for each indicator of the GRI Financial Sector supplement, which was required for banks under GRI G4. The Financial Sector elements are provided at the end of this Content Index.

Every effort has been made to provide complete and clear information in this report. For clarity, any references to our Annual Report refer to appropriate pages and sections within the 2020 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	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
102-1	Name of the organization	Core	NIBC Holding N.V. - Report cover page - Acknowledgements p356	none
102-2	Activities, brands, products, and services	Core	Annual Report - At a Glance, p5-7 - Letter from the CEO, p15-16 - Report of the Managing Board, p20-25  Brands include NIBC Bank, NIBC Direct, OIMIO, Lot Hypotheken, Lendex and Beequip. An aspect which differentiates NIBC from many peer banks is that NIBC's business model does not provide for current accounts.	none
102-3	Location of headquarters	Core	The Hague, Netherlands - Acknowledgements p356	none
102-4	Location of operations	Core	Annual Report, - At a glance, p5-7  NIBC has operations in the Netherlands, Germany, the United Kingdom, and Belgium. An aspect which differentiates NIBC from many brick and mortar universal banks is that NIBC does not have physical brick and mortar retail offices.	none
102-5	Ownership and legal form	Core	Annual Report - About NIBC, p23 - Our Heritage, p5  NIBC's legal form is N.V. ("Naamloze Vennoootschap"), a type of public company which is the common form for corporates in the Netherlands.	none
102-6	Markets served	Core	Annual Report - At a Glance, p6  NIBC serves markets in north-western Europe.	none
102-7	Scale of the organization	Core	Annual Report - At a Glance, p6 - Key Figures, p12-14	none
102-8	Information on employees and other workers	Core	Annual Report - At a Glance, p5-7 - Key Figures, p14 - Our People, p72-74 Website - Sustainability ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )  Our 2020 Sustainability Report on our corporate website provides additional details on our employees and other workers. Figures are compiled from NIBC's management systems.	102-8d, not applicable
102-9	Supply chain	Core	Annual Report: - Our place in the financial ecosystem, p22-23 - NIBC's Value chain, p69-70 - Business Partners, p70 Website - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Our Value Chain ( <a href="http://nibc.com/about-nibc/sustainability/our-value-chain/">nibc.com/about-nibc/sustainability/our-value-chain/</a> )  NIBC's supply chain consists mostly of service companies such as IT, legal service providers, and communication service providers. Most of these suppliers are located in the same operating geographies as NIBC Examples are provided throughout our Annual Report.	none
102-10	Significant changes to the organization and its supply chain	Core	Annual Report - Letter from the CEO, p15-16 - General Developments, p21-22 - NIBC's Value Chain, p69-70	none

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
102-11	Precautionary Principle or approach	Core	<p>Annual Report:  - Risk Management, p48-59  - Sustainability p60-61</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>NIBC applies the Precautionary Principle through its risk management and compliance approach toward potential environmental and social risks. 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>	none
102-12	External initiatives	Core	<p>Annual Report  - Sustainability, p60-71</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>)  - TCFD 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> <p>Dutch Banking Code  Dutch Corporate Governance Code  Equator Principles (member institution)  UN Global Compact (signatory)  Dutch IMVO/SER banking sector covenant (signatory)  Universal Declaration of Human Rights (by policy)  UN Guiding Principles for Business and Human Rights (by policy)  OECD Guidelines for Multinational Enterprises (by policy)  ILO Core Conventions (by policy)  UN PRI (by policy)  UNEP FI (by policy)  UN Convention on the Elimination of All Forms of Discrimination against Women (by policy)  UN Declaration on the Rights of Indigenous Peoples (by policy)  UNICEF Convention on the Rights of the Child (by policy)  Wolfsberg Principles (by policy)  FATF recommendations (by policy)  Responsible Ship Recycling Standards (by policy)  PCAF Partnership for Carbon Accounting Financials (signatory)</p> <p>Additional external principles and charters applied by NIBC are stated in our corporate governance, compliance and sustainability policies.</p>	none
102-13	Membership of associations	Core	<p>NIBC is a member of the Dutch Banking Association (NVB) and Dutch Association of Covered Bond Issuers (DACB).</p> <p>Paulus de Wilt is board member of the Dutch Banking Association (NVB). Herman Dijkhuizen is member of the Commission Supervision of the Dutch Banking Association (NVB). Around 40 NIBC employees are members of committees or expert pools at these associations.</p>	none

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
102-14	Statement from senior decision-maker	Core	Annual Report, - Letter from the CEO, p15-16	none
102-15	Key impacts, risks, and opportunities		Annual Report, - SWOT analysis, p77-78 - Risk Management, p48-59 - Sustainability, p60-71 Website - Sustainability Report (nibc.com/about-nibc/sustainability/)	none
102-16	Values, principles, standards, and norms of behavior	Core	Annual Report, - At a glance, p5-7 - CEO Letter, p15-16 - Vision & Strategy, p22-24 - Our People / Banking on Trust, p72 Website, - Vision and Principles (nibc.com/about-nibc/vision-and-principles/) - Code of Conduct, (nibc.com/about-nibc/corporate-governance/)	none
			<p>As part of their employment contract, each staff member has agreed to adhere to the NIBC code of conduct. Dutch staff sign the Bankers Oath, which is also displayed prominently in NIBC's offices in the Hague and Amsterdam. Training on NIBCs values, ethics, and code of conduct are provided regularly to all staff. Compliance and integrity training is also obligatory for all new employees when they join NIBC.</p> <p>During 2020, all employees received training on NIBC's Code of Conduct and other key compliance and sustainability topics. The Code of Conduct applies NIBC's internal policy structure which requires a defined owner within the organisation, version management, and other standard aspects.</p>	
102-17	Mechanisms for advice and concerns about ethics		Annual Report - Anti-fraud and anti-corruption, p50-51 - Sustainability, p60-71 - Complaints, p68, 353  Website: - Grievances and complaints (nibc.com/about-nibc/contact-nibc/complaints-form/) - Code of Conduct (nibc.com/about-nibc/corporate-governance/) - Whistleblowing (nibc.com/about-nibc/corporate-governance/compliance/)	none
			<p>NIBC updated our publicly accessible complaints mechanism during 2020, in accordance with best practices such as the OECD Guidelines for Multinationals and UNGPs. Internal whistleblowing procedures are available to employees on NIBC's intranet. These mechanisms are included in guidance provided to employees for NIBC's Code of Conduct. By policy, requests for advice or concern are treated confidentially by designated trust persons. This mechanism also can be used anonymously.</p>	
102-18	Governance structure	Core	Annual Report: - Report of the Supervisory Board, p105-117 - Corporate Governance, p95-99 - How we manage sustainability, p87-90  Website: - Corporate Governance (nibc.com/about-nibc/corporate-governance/) - Sustainability Governance (nibc.com/about-nibc/sustainability/sustainability-governance/)	none
			<p>NIBC maintains a two-tier board structure consisting of a Managing Board and a Supervisory Board. The Managing Board is responsible for the day-to-</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			day management, which includes, among other things, formulating NIBC's strategy, policies and setting and achieving NIBC's objectives. The Supervisory Board supervises and advises the Managing Board.	
102-19	Delegating authority		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Report of the Supervisory Board, p105-117</li> <li>- Corporate Governance, p95-99</li> <li>- How we manage sustainability, p61-62</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>	none
102-20	Executive-level responsibility for economic, environmental, and social topics		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Business Review, p25</li> <li>- How we manage sustainability, p87-90</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>NIBC's Executive Committee is responsible for economic, environmental and social topics. Sustainability matters are monitored and reported periodically to the ExCo. An update is provided quarterly to NIBC's Supervisory Board.</p> <p>Executive-level responsibility is publicly transparent. For example, our CEO signed the Climate Agreement of the Dutch financial sector on behalf of NIBC. NIBC's Chief Risk Officer signs NIBC's Modern Slavery Statement each year on behalf of our Executive Committee.</p>	
102-21	Consulting stakeholders on economic, environmental, and social topics		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- General Developments, p21</li> <li>- Climate Risk p51-52</li> <li>- Sustainability p60-71</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> <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>Despite the pandemic, engagement with stakeholders was active. The wide range of discussion topics included financial issues as well as non-financial dilemmas and concerns. A core focus during 2020 was helping stakeholders in the short-term to face the COVID-19 crisis and the specific challenges that arose. We received and responded to customer queries, participated in virtual 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>	
102-29	Identifying and managing economic, environmental, and social impacts		<p>Annual Report</p> <p>Stakeholder engagement and materiality, p65-68</p> <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>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			<p>NIBC's policies commit us to performing ESG due diligence and assessments of relevant and material environmental risks, climate risks, biodiversity risks, human rights risks and governance risks for all corporate clients and transactions.</p> <p>NIBC has appropriate processes in place to identify and manage economic, environmental, and social risks and impacts. Stakeholders are regularly consulted to identify and prioritize the issues which are most material and the potential material and salient impacts, risks, and opportunities.</p>	
102-30	Effectiveness of risk management processes		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- At a Glance, p5-7</li> <li>- Key Figures, p12-14</li> <li>- Climate Risk, p51-52</li> <li>- Risks and Outcomes, p63-64</li> <li>- Performance, p64-65</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. Other qualitative and quantitative ESG risk impact indicators are mentioned throughout NIBC's reporting.</p> <p>During 2020, 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.</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, p61-65</li> <li>- Stakeholder engagement and materiality, p65-71</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 also 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>- How we manage sustainability, p61-65</li> <li>- Corporate responsibility reporting scope, p345-346</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 and how we are creating and sustaining value.</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			The Annual Report is drawn up by the Managing Board and reviewed and approved by our Supervisory Board.	
102-33	Communicating critical concerns		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- How we manage sustainability, p61-65</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>	
102-34	Nature and total number of critical concerns		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Performance, p64-65</li> </ul> <p>Severe adverse human rights incidents related to NIBC's financings during 2020 were acted upon in accordance with our duty of care under leading international human rights standards. For example NIBC chose not to proceed with a transaction due to serious human rights concerns. Risks were identified during our due diligence process, leading to this decision. 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 continues to be a significant challenge for corporate clients.</p> <p>During 2020, no severe adverse environmental incidents related to NIBC's financings, own operations or supply chain were reported. At the same time, we recognise that physical and transitional climate risks are present and impacts will continue to become more visible in future years</p>	
102-35	Remuneration policies		<p>Annual Report,</p> <ul style="list-style-type: none"> <li>- Remuneration report, p100-106</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>- 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>)</li> </ul> <p>The Supervisory Board reviewed and amended NIBC's remuneration policy in 2020. NIBC has strengthened governance around the annual remuneration process and agreed upon key roles for the Human Resources, Risk Management, Compliance, Audit and Finance functions (control functions). As of the financial year 2020 the CEO and the members of the Managing Board are no longer eligible for variable compensation.</p>	
102-36	Process for determining remuneration		<p>Annual Report,</p> <ul style="list-style-type: none"> <li>- Remuneration report, p100-106</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- Corporate Governance (<a href="http://nibc.com/about-nibc/corporate-governance/supervisory-board/">nibc.com/about-nibc/corporate-governance/supervisory-board/</a>)</li> <li>- 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>)</li> </ul> <p>The process for determining remuneration is set out in NIBC's "Governance</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			of remuneration policies, roles and responsibilities" document on our website and is summarized in our Annual Report.	
102-37	Stakeholders' involvement in remuneration		Annual Report, - Remuneration report, p100-106	
102-38	Annual total compensation ratio		Annual Report, - Remuneration report, p104	
			In line with the Dutch Corporate Governance Code, NIBC publicly discloses relevant elements related to the compensation ratios.	
102-39	Percentage increase in annual total compensation ratio		Annual Report, - Remuneration report, p100-101	
102-40	List of stakeholder groups	Core	Annual Report: - Stakeholder engagement and materiality, p65-66  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> )	
			We define stakeholders as any group or individual affected directly or indirectly by our activities. We have identified our main stakeholders to include clients, institutional investors, shareholders, regulators, employees and civil society organisations.	
102-41	Collective bargaining agreements	Core	Annual Report: - Works Council, p73  Website - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
			NIBC's employees are represented in formal discussions with management by our main representative body, the NIBC Works Council. The Works Council formally represents Dutch employees, but its agreements also benefit employees in other locations.	
			As mentioned in our Human Rights policy supplement, NIBC also supports the right of workers to collective bargaining in our financings and investments and with suppliers. We regularly engage with representatives of international labor unions to discuss developments.	
102-42	Identifying and selecting stakeholders	Core	Annual Report: - Stakeholder engagement and materiality, p65-69  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> )	
			We define stakeholders as any group or individual affected directly or indirectly by our activities. We have identified our main stakeholders to include clients, institutional investors, shareholders, regulators, employees and civil society organisations. We actively seek these connections to the world around us to ensure we reflect on our business, understand our impact and to continue to innovate .	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
102-43	Approach to stakeholder engagement	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Stakeholder engagement and materiality, p65-69</li> <li>- Examples of stakeholder engagement, p68-69</li> <li>- Long-term value creation, p78</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>NIBC recognises its responsibilities towards stakeholders, regularly engages with them and considers their interests in its day-to-day decisions and activities. Engaging with stakeholders in a proactive way and on a continuous basis is central to our strategy and ambition to achieve sustainable growth..</p>	
102-44	Key topics and concerns raised	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Stakeholder engagement and materiality, p65-69</li> <li>- Examples of stakeholder engagement, p68-69</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>	
102-45	Entities included in the consolidated financial statements	Core	<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Principal Subsidiaries and associates, p259</li> </ul> <p>NIBC Holding N.V. is the direct or indirect holding company for NIBC's subsidiaries.</p>	
102-46	Defining report content and topic Boundaries	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Corporate Responsibility Reporting Scope, p345</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>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:</p> <ul style="list-style-type: none"> <li>- Stakeholder engagement and materiality, p65-69</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>A list of material topics is provided in NIBC's Materiality Assessment report. This is further supported through regular stakeholder dialogues, both formal and informal.</p>	
102-48	Restatements of information	Core	Any restatements of information are noted in our Annual Report.	
102-49	Changes in reporting	Core	No material changes from 2019 have been made in terms of our reporting.	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
102-50	Reporting period	Core	This GRI Content Index is for the full year 2019, from 01-01-2020 until 31-12-2020.	
102-51	Date of most recent report	Core	Our prior report was published March 2020, for the period 01-01-2019 until 31-12-2019	
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, p353  Questions and feedback regarding NIBC's GRI Content Index and our approach towards sustainability, corporate social responsibility (CSR), ESG, 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, p345  NIBC has prepared its report in accordance with the latest GRI Standards, core option. For 2020, we have continued to provide additional disclosures beyond GRI's base requirement for "core" in order to provide greater transparency for interested readers and stakeholders.	
102-55	GRI content index	Core	NIBC's GRI Content Index is updated and published annually, following the publication of our Annual Report.  For each element, we provide direct answers, page and section references to our Annual Report, and links to other online resources and documents.	
102-56	External assurance	Core	Annual Report - Corporate responsibility reporting scope, p345  The non-financial key figures and the related processes have been reviewed by NIBC's internal auditors. Internal Audit has confirmed that nothing has come to the attention that causes them to believe that the reported nonfinancial key figures for NIBC Holding N.V. are inadequately presented, in all material respects, in accordance with the reporting criteria. These figures were not externally audited in 2020.  Our carbon footprint (Scope 1 and 2) estimates have been independently calculated for NIBC using tools provided by Climate Neutral Group, a social venture that was established in 2002 by Stichting Doen. Calculation of scope 3 estimates for financed GHG emissions follows methodologies developed in the Partnership for Carbon Accounting Financials (PCAF).	
103-1	Explanation of the material topic and its Boundary	Core	Material Topic: Financial Performance  Annual Report: - Financial Highlights, p9 - Key Figures, p12-14 - Stakeholder engagement and materiality, p66-68 Website: - Materiality Assessment ( <a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a> )  NIBC's stakeholders have indicated that financial performance is highly important to them. Stakeholders have expressed the importance that they place on NIBC focusing on its financial targets, maintaining its cost efficiency, building financial resilience and delivering on its promises. They also recognise that our ability to deliver positive non-financial impacts and contribute to the sustainable development goals relies on good financial performance. Therefore this is a material topic for NIBC.	
103-2	The management approach and its components	Core	Annual Report: - Report of the Managing Board, p20-25	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			<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>As a professional, entrepreneurial and inventive financial partner, we look to build long-term relationships that are based on trust, transparency and reliability.</p> <p>We report financial and non-financial information publicly as part of our Annual Report and other disclosures. We commit to adhering to international standards in our financial and non-financial reporting. Our Annual Report, Pillar III, NACE Supplement, GRI Content Index, TCFD Report and Sustainability Report are clear examples of our approach.</p>	
103-3	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Financial Highlights, p9</li> <li>- Key Figures, p12-14</li> <li>- Financial Review, p38-47</li> <li>- Consolidated financial statements p109-325</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>	
103-1	Explanation of the material topic and its Boundary	Core	<p>Material Topic: Climate Change</p> <p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Climate Risk, p51-53</li> <li>- Due Diligence and Monitoring, p62</li> <li>- Risks and Outcomes, p63</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>- 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> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Sustainability is integrated in NIBC's business strategy. Nationally the Netherlands aims to reduce greenhouse gas emissions by 55% or more from 1990 levels by 2030 and to become net zero before 2050. NIBC is committed to these same targets in our own operations and our estimated financed emissions.</p> <p>In practice, this means supporting our clients to transition and adapt. It also means that we must continue to take steps in our own operations. Innovation and the energy transition are two themes which we see across our businesses and are embedded in our corporate strategy.</p>	
103-2	The management approach and its components	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Climate Risk, p51-53</li> <li>- Core Standards, p62</li> <li>- Due Diligence and Monitoring, p62</li> <li>- Risks and Outcomes, p63-64</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>- 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> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			<p>NIBC's Sustainability Framework and its policies are based on internationally recognised conventions, standards and best practices such as the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the Paris Climate Agreement.</p> <p>NIBC's policies commit us to performing ESG due diligence and assessments of relevant and material environmental risks, climate risks, biodiversity risks, human rights risks and governance risks for all corporate clients and transactions.</p> <p>During 2020 we reviewed all of our sustainability policies, updating where necessary to reflect improvements, best practices and relevant societal developments. Policy updates reflected ongoing dialogue and regular consultation with our stakeholders.</p>	
103-3	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Due Diligence and Monitoring, p62</li> <li>- Risks and Outcomes, p63-64</li> <li>- Performance, p65</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>- 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> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>During 2020, no severe adverse environmental incidents related to NIBC's financings, own operations or supply chain were reported. At the same time, we recognise that physical and transitional climate risks are present and impacts will continue to become more visible in future years.</p> <p>In 2020, NIBC published its first TCFD Report, evidence of our commitment to be transparent, measure estimated emissions, and report on our progress. Lack of access to actual energy and emissions data of clients is a constraint for NIBC and peer financial institutions. We will continue to work with stakeholders to improve access to detailed data in order to further develop our insights. New reporting standards are regularly proposed, a signal that existing sustainability accounting and reporting methodologies will continue to evolve over the coming years.</p>	
103-1	Explanation of the material topic and its Boundary	Core	<p>Topic: Product Responsibility</p> <p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Stakeholder engagement and materiality, p66-68</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>Stakeholders view product responsibility as part of the foundation for their trust in NIBC. They have indicated that product responsibility is highly important to them. Therefore this is a material topic for NIBC.</p> <p>We recognize that the boundary for product responsibility is broad. It is closely connected with our code of conduct and duty of care towards clients. For example, our retail savings clients expect a safe online environment. All customers expect clear, understandable, and fair term and conditions. Retail and corporate clients expect privacy and protection of their information.</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
103-2	The management approach and its components	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Key Figures, 12-14</li> <li>- Report of the Managing Board, p19-37</li> <li>- Risk management, p48-59</li> <li>- Sustainability p60-71</li> <li>- Long-term value creation, p78</li> <li>- Corporate Governance, p95-99</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>	
103-3	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Key Figures, 12-14</li> <li>- Risk management, p48-59</li> <li>- Sustainability p60-71</li> <li>- Report of the Supervisory Board, p81-94</li> <li>- Corporate Governance, p95-99</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>Stakeholders view this as an area of strength for NIBC. Our retail clients expressed appreciation for our online platform and clear terms and conditions. Investors liked NIBC's transparency, willingness to strengthen ESG standards and effort to open the leveraged loan market for increased responsible investment.</p>	
103-1	Explanation of the material topic and its Boundary	Core	<p>Topic: Client Satisfaction</p> <p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Key Figures, 12-14</li> <li>- Value Chain, p70-71</li> <li>- Stakeholder engagement, p65-69</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>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>	
103-2	The management approach and its components	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Key Figures, 12-14</li> <li>- Value Chain, p70-71</li> <li>- Stakeholder engagement, p65-69</li> <li>- Remuneration report, p124-129</li> </ul> <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>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			<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 pre-agreed targets, how they have behaved according to NIBC's corporate values, as well as their contributions towards the bank's longer-term objectives. Non-financial performance aspects include client satisfaction, employee satisfaction, transparency, and sustainability. The Dutch Banking Code serves as a guideline for all employees.</p>	
103-3	Evaluation of the management approach	Core	<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- At a Glance, p5-7</li> <li>- Key Figures, p12-14</li> <li>- Business Review, p25-26</li> <li>- Lot Hypotheken, p33</li> <li>- Performance Evaluation, p75-76</li> <li>- Report of the Supervisory Board, p81-94</li> </ul>	
201-1	Direct economic value generated and distributed		<p>Our most important stakeholder, the customer, continues to value our efforts to serve his or her interests. Due to increased attention for corporate loan Client Due Diligence and Know Your Customer documentation, which by some clients was perceived as bureaucratic and an administrative burden, this year's NPS for corporate clients was +30% (2019: +47%; 2018: + 63%). Our NIBC Direct Customer Survey was 7.9 in 2020 (2019: 7.9; 2018: 7.7). Newly launched Lot Hypotheken received an extraordinary first NPS of +55%. The success of a mid-sized niche market bank and retail offering like NIBC stands or falls with an excellent customer experience. Therefore, the Supervisory Board pays close attention to these metrics.</p> <p>Annual Report,</p> <ul style="list-style-type: none"> <li>- At a Glance, p5</li> <li>- Key Figures, p11</li> <li>- Consolidated financial statements 109-313</li> </ul>	
201-2	Financial implications and other risks and opportunities due to climate change		<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> <p>Annual Report</p> <ul style="list-style-type: none"> <li>- Letter from the CEO, p16</li> <li>- Sustainability, p60-71</li> <li>- SWOT Analysis, p77</li> <li>- Climate Risk, p51-52</li> </ul> <p>While the Covid-19 pandemic dominated both = ESG and financial impacts during 2020, we recognise climate risk and water scarcity as the most material potential environmental risks for NIBC. From a financial perspective, there are seen as primarily medium to long term risks and have the potential to materialise if they are not well-managed and mitigated.</p> <p>The energy transition triggered by growing public awareness and technology developments is seen as an opportunity and is mentioned alongside sustainability ageing population, platformisation and consumer empowerment as trends influencing NIBC's focused strategy and business model.</p>	
201-3	Defined benefit plan obligations and other retirement plans		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Our People, p73</li> <li>- Remuneration report, p100-106</li> <li>- Note 39 Employee benefit obligations, p226</li> </ul>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
201-4	Financial assistance received from government		During 2020, NIBC did not receive any financial assistance from the government for its own benefit (2019:0, 2018:0).	
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		<p>Annual Report - Our People, p74 Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</p> <p>All employees are paid above local minimum wages. The 2020 ratio of standard entry level wages at NIBC is x1.92 (2019: 2.32, 2018: 2.32). on average x1.92 for men (2019: 2.20; 2018: 2.31), x1.92 for women (2019: 2.15; 2018: 2.35). NIBC also reports detailed gender pay ratios in our Annual Report.</p>	
202-2	Proportion of senior management hired from the local community		100% of new senior management hires during 2020 were made from the countries where they are based.	
203-1	Infrastructure investments and services supported		<p>Annual Report, - Portfolio, p13 - General developments, p21-22 - Corporate portfolios, p26-28 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>	
203-2	Significant indirect economic impacts		<p>Annual Report, - General Developments, p21-22 - Corporate client offering, p26-28 - Developments in risk management, p56-58 - Climate Risk, p51-52 - Risks and Outcomes, p88-89</p> <p>Significant indirect economic impacts are mentioned throughout our Annual Report.</p>	
205-1	Operations assessed for risks related to corruption		<p>Annual Report - Letter from the CEO, p15 - Purpose and Corporate Values, p23 - Anti-fraud and anti-corruption, p50-51</p> <p>NIBC takes a comprehensive approach to mitigate risks related to corruption. For example, all staff received mandatory training during 2020 in regard to NIBC's Code of Conduct and compliance policies. Furthermore all corporate clients and transactions are assessed for risks related to corruption as part of NIBC's due diligence processes. Appropriate assessments are also made as part of KYC processes for Retail Banking. Assessments are also performed for suppliers of services to NIBC.</p>	
205-2	Communication and training about anti-corruption policies and procedures		<p>Annual Report - Purpose and Corporate Values, p23 - Anti-fraud and anti-corruption, p50-51</p> <p>Communication and training about anti-corruption are part of NIBC's regular compliance, ethics, and sustainability trainings. During 2020, NIBC employees were required to complete a mandatory training in regard to our corporate Code of Conduct as well as on related compliance policies such as anti-corruption, anti-money laundering and anti-bribery. These updates demonstrate NIBC's ongoing commitment towards good corporate governance and to uphold the ten principles of the United Nations Global Compact.</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
205-3	Confirmed incidents of corruption and actions taken		Annual Report - Purpose and Corporate Values, p23 - Anti-fraud and anti-corruption, p50-51	
			No incidents of fraud, bribery or corruption were reported for 2020.	
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 2020.	
301-1	Materials used by weight or volume		Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
301-2	Recycled input materials used		Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
301-3	Reclaimed products and their packaging materials		Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
302-1	Energy consumption within the organization		Annual Report - Performance, p64-65 Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
			Energy consumption within the organization and related emissions are reported. 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		Annual Report - Performance, p64-65 Website: - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - NACE Supplement ( <a href="http://nibc.com/about-nibc/investor-relations/annual-reports/">nibc.com/about-nibc/investor-relations/annual-reports/</a> )	
			Energy consumption outside of the organization and related emissions are reported. 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.	
302-3	Energy intensity		Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
			Energy intensity ratios based on FTEs and total financed exposures are reported in NIBC's TCFD Report and Sustainability Report.	
302-4	Reduction of energy consumption		Annual Report - Performance, p64-65 Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
			Renovations completed in past years at our headquarters in The Hague delivered increased efficiency and reduced energy-related carbon emissions. NIBC aims to increase our energy efficiency in our own operations in accordance with our commitments under the dutch Climate Accord 'Klimaat Akkoord' and the Paris Climate Agreement.	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
302-5	Reductions in energy requirements of products and services		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Corporate Client Offering/North Westerly VI CLO), p26</li> <li>- Business Review/Lot Hypotheken, p25</li> <li>- Sustainable business, p60-61</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- Sustainability Policies (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <p>NIBC promotes increased energy efficiency with its corporate and retail clients in accordance with our commitments under the dutch Climate Accord 'Klimaat Akkoord' and the Paris Climate Agreement.</p>	
303-1	Water withdrawal by source		<p>Website</p> <ul style="list-style-type: none"> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Each of NIBC's offices is connected to local municipal water mains. Total usage (withdrawal) for each location is reported in our Sustainability Report.</p>	
303-2	Water sources significantly affected by withdrawal of water		<p>Website</p> <ul style="list-style-type: none"> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>In its operations, NIBC uses local municipal water supplies. No water sources are significantly affected by withdrawal of water due to NIBC's operations.</p>	
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		<p>NIBC's own operations are not located in close proximity to protected areas, areas of high conservation value, or areas of high biodiversity value.</p>	
304-2	Significant impacts of activities, products, and services on biodiversity		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Performance, p65</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>- UN Global Compact Commitment on Progress (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>), p6-7</li> </ul> <p>During 2020, no severe environmental incidents including significant impacts on biodiversity related to NIBC's financings, own operations or supply chain were reported.</p> <p>To avoid or mitigate indirect impacts, NIBC screens potential clients and financings for biodiversity risks as part of its client and transaction due diligence processes.</p>	
304-3	Habitats protected or restored		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Performance, p65</li> <li>- Stakeholder engagement and materiality, p90-94</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- UN Global Compact Commitment on Progress (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>), p6-7</li> <li>- Sustainability Policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Environment Policy Supplement (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			NIBC performs sustainability due diligence for all clients and transactions in order to protect sensitive marine and land habitats and avoid harmful biodiversity impacts.	
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Performance, p65</li> </ul> <p>Website:</p> <ul style="list-style-type: none"> <li>- UN Global Compact Commitment on Progress (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>), p6-7</li> <li>- Sustainability Policy (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> <li>- Environment Policy Supplement (<a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a>)</li> </ul> <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 2020. Furthermore there have been no material adverse environmental impacts reported to NIBC in regard to its financings and investments during 2020.</p> <p>By policy, NIBC performs due diligence in regard to new corporate clients and transactions to avoid potential negative impacts on IUCN Red List species, national conservation list species and sensitive land or marine habitats.</p>	
305-1	Direct (Scope 1) GHG emissions		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risks and Outcomes, p63</li> <li>- Performance, p64</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Greenhouse gas emissions estimates are reported in total in our Annual Report and in detail in our TCFD Report and Sustainability Reports.</p>	
305-2	Energy indirect (Scope 2) GHG emissions		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risks and Outcomes, p63</li> <li>- Performance, p64</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Greenhouse gas emissions estimates are reported in total in our Annual Report and in detail in our TCFD Report and Sustainability Reports.</p>	
305-3	Other indirect (Scope 3) GHG emissions		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risks and Outcomes, p63</li> <li>- Performance, p64</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Greenhouse gas emissions estimates are reported in total in our Annual Report and in detail in our TCFD Report and Sustainability Reports.</p>	
305-4	GHG emissions intensity		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risks and Outcomes, p63</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <li>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</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> <p>Greenhouse gas emissions intensity estimates are reported in our TCFD Report and Sustainability Report. NIBC has also reported a preliminary Green</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			Asset Ratio (GAR) for financed corporate exposures and EU Green Taxonomy-aligned exposures per sector activity in our 2020 NACE Supplement.	
305-5	Reduction of GHG emissions		Annual Report - Performance, p64 Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
307-1	Non-compliance with environmental laws and regulations		Annual report - Key figures, p14 - Performance, p64  No incidents of non-compliance with environmental or other laws and regulations were reported for 2020. Further, during 2020, no material adverse environmental incidents related to NIBC's financings, own operations or supply chain were reported.  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.	
308-1	New suppliers that were screened using environmental criteria		Annual Report - Due diligence and monitoring, p62-63 Website - TCFD Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> ) - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )  NIBC screens new and existing suppliers against sustainability / ESG criteria using its internal know your supplier ("KYS") procedure.	
308-2	Negative environmental impacts in the supply chain and actions taken		Annual Report - Risks and Outcomes, p63-64  No material adverse environmental impacts or incidents were reported regarding NIBC's supply chain during 2020. Potential suppliers which did not meet the sustainability criteria mentioned in NIBC's purchase conditions were rejected during our procurement process.  NIBC screens clients and suppliers against sustainability (human rights, environmental, and governance) criteria using its internal sustainability, know your client (KYC) and know your supplier ("KYS") processes and procedures.  NIBC remains alert and continue to work with our clients and suppliers to apply best available practices to mitigate and avoid negative environmental impacts in our supply chain.	
401-1	New employee hires and employee turnover		Annual Report - Key Figures, p14 - Our People, p72-74 Website - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees		None reported. By policy employees receive written confirmation of any changes in their individual compensation and benefits.	
401-3	Parental leave		All employees are entitled to parental leave. This employee right is described in NIBC's internal <i>Staff Manual</i> .	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			<p>NIBC complies with the statutory requirements for parental leave in each of its operating locations.</p> <p>By policy, all changes in the Manual, with the exception of those resulting from changes in legislation, must be approved by the Works Council, with account being taken of the provisions of Article 27 A through L of the <i>Works Councils Act</i> [Wet op de Ondernemingsraden].</p>	
402-1	Minimum notice periods regarding operational changes		<p>Annual Report - Works Council, p64, 73, 86, 104</p> <p>NIBC complies with the statutory requirements for operational changes in each of its operating locations.</p>	
403-1	Workers representation in formal joint management– worker health and safety committees		<p>Annual Report - Works Council, p64, 73, 86, 104</p> <p>Workers are represented in formal joint management-worker discussions on health and safety by the NIBC Works Council.</p>	
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities		<p>Annual Report - Key Figures, p14 - Absenteeism &amp; vitality, p73</p> <p>Absenteeism remained very low at 1.6% in 2020 (2019: 2.0%, 2018: 2.1%).</p> <p>No work-related fatalities severe onsite injuries, or occupational diseases were reported during 2020 (2019:0; 2018: 0).</p>	
403-3	Workers with high incidence or high risk of diseases related to their occupation		<p>Not material. For 2020. no high incidence or high risk of diseases related to occupation were found. (2019:0; 2018:0).</p>	
403-4	Health and safety topics covered in formal agreements with trade unions		<p>Annual Report - Works Council, p64, 73, 86, 104</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>	
404-1	Average hours of training per year per employee		<p>Annual Report - Key Figures, p14 - Our People, p72-74</p> <p>NIBC reports the average training expense per employee, but does not track the average number of hours per employee.</p>	Partially Reported
404-2	Programs for upgrading employee skills and transition assistance programs		<p>Annual Report - Our People, p73 - Ongoing investment, p76 Website - Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</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>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
404-3	Percentage of employees receiving regular performance and career development reviews		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Our People, p73</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>All employees receive annual performance and career development reviews, except employees who joined shortly before the review process commences, or who will leave the company during the process.</p>	
405-1	Diversity of governance bodies and employees		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Non-Financial Highlights, p8</li> <li>- Key Figures, p14</li> <li>- Sustainability, p64, 67-68</li> <li>- Our People, p72, 73-74</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>	
405-2	Ratio of basic salary and remuneration of women to men		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Gender Pay Ratio, p74</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>Figures are reported across multiple levels. This calculation adheres to the GRI definition of basic salary and remuneration of women to men for each employee category, NIBC has systems in place to manage pay equity and monitors salary levels by gender to ensure fairness by level and responsibility.</p>	
406-1	Incidents of discrimination and corrective actions taken		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risk Governance, p51</li> </ul> <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>	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		<p>Website:</p> <ul style="list-style-type: none"> <li>- Human Rights Policy Supplement, <a href="http://nibc.com/about-nibc/sustainability/sustainability-governance/">nibc.com/about-nibc/sustainability/sustainability-governance/</a></li> </ul> <p>No operations or suppliers were identified where these rights might be significantly at risk during 2020.</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.</p>	
408-1	Operations and suppliers at significant risk for incidents of child labor		<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</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			<p>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 2020. At the same time we are alert to these risks and recognise that such practices may exist at lower tiers of certain value chains, particularly as related to extractives or other raw materials.</p>	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor		<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 2020. At the same time we are alert to these risks and recognise that such practices may exist at lower tiers of certain value chains, particularly as related to extractives or other raw materials.</p>	
410-1	Security personnel trained in human rights policies or procedures		<p>The use of security personnel allows NIBC and our commercial and civil society organisation tenants to operate in a safe and productive manner.</p> <p>All NIBC facilities staff were trained in regard to NIBC's Code of Conduct and compliance policies during 2020, also in 2019 and 2018. Security personnel contracted by NIBC have been trained in human rights policies and procedures according to our security provider's own policies.</p> <p>NIBC's security provider is also a signatory to UN Global Compact, and holds a number of third party certifications including ISO 26000, ISO 14001:2004, OHSAS 18001:2007</p>	
411-1	Incidents of violations involving rights of indigenous peoples		<p>Website</p> <ul style="list-style-type: none"> <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 2020 as related to NIBC's financings, our operations or our supply chain (2019:0; 2018: 0).</p> <p>Due diligence was performed for this aspect as part of NIBC's integrated sustainability assessments of corporate clients and transactions and in our supplier due diligence process. During 2019, NIBC was also active in national and sectoral dialogues on land rights and FPIC.</p>	
412-1	Operations that have been subject to human rights reviews or impact assessments		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Non-Financial Highlights, p8</li> <li>- Key Figures p14</li> <li>- Sustainability, p60-65</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>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			By policy, all new corporate clients, corporate financings and investments of NIBC were screened for potential material human rights impacts during 2020. NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" procedures and due diligence. NIBC's approach to Human Rights is elaborated in our Human Rights Policy Supplement.	
412-2	Employee training on human rights policies or procedures		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risk Governance, p51</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>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, p60-65</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 2020.</p> <p>NIBC's suppliers are also screened for human rights as part of our "Know Your Supplier" (KYS) procedures and due diligence.</p>	
413-1	Operations with local community engagement, impact assessments, and development programs		<p>Annual Report:</p> <ul style="list-style-type: none"> <li>- Sustainability, p60-65</li> <li>- Stakeholder engagement and materiality, p65-71</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 2020 included joint initiatives with civil society organisations in NIBC's NGO Boulevard, collaborative initiatives in financial education during Week van het Geld / Global Money Week, an initiative with the national Food Bank and a holiday initiative for the children of Stichting Vitalis.</p>	
413-2	Operations with significant actual and potential negative impacts on local communities		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risks and Outcomes, p63-64</li> </ul> <p>No significant actual or potential negative impacts of NIBC operations or financings/investments on local communities were reported for 2020.</p>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
414-1	New suppliers that were screened using social criteria		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Due diligence and monitoring, p62-63</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>- General purchasing and invoicing conditions, (<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>- Sustainability Report, (<a href="http://nibc.com/about-nibc/sustainability/sustainability/">nibc.com/about-nibc/sustainability/sustainability/</a>)</li> </ul> <p>NIBC screens new clients and new suppliers against sustainability (human rights, environmental, and governance) criteria using its internal sustainability framework, know your client ("KYC") and know your supplier ("KYS") processes and procedures.</p>	
414-2	Negative social impacts in the supply chain and actions taken		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Risks and outcomes, p63-64</li> <li>- Performance, p64-65</li> <li>- Examples of stakeholder engagement, p68-69</li> </ul> <p>Severe adverse human rights incidents related to NIBC's financings during 2020 were acted upon in accordance with our duty of care under leading international human rights standards. For example NIBC chose not to proceed with a transaction due to serious human rights concerns. Risks were identified during our due diligence process, leading to this decision.</p>	
415-1	Political contributions		<p>EUR 0. NIBC made no direct political contributions during 2020 (2019: 0; 2018: 0).</p> <p>Beyond its participation in trade associations (GRI 102-13), NIBC does not employ or engage professional lobbyists or make any direct political contributions.</p>	
416-1	Assessment of the health and safety impacts of product and service categories		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Business Review, p25</li> <li>- Due diligence and monitoring, p62</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 (significant changes to existing products) procedures.</p>	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Performance, p60-61</li> </ul> <p>During 2020, no incidents of non-compliance concerning the health and safety impacts of products and services were reported (2019:0; 2018: 0). In certain cases we chose not to proceed with financings in order to protect human rights in accordance with our duty of care.</p>	
417-1	Requirements for product and service information and labeling		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Business Review, p25</li> <li>- Sustainable Business, p63-65</li> <li>- Core Standards, p62</li> </ul> <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>	

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)	Omissions
			For our NIBC Direct retail offerings, such as online saving accounts, consumer mortgages, and a buy-to-let mortgages, our terms and conditions are written in plain language and avoid small print.	
417-2	Incidents of non-compliance concerning product and service information and labeling		No incidents of non-compliance concerning product and service information and labeling were reported in 2019 (2018: 0; 2017:0).	
417-3	Incidents of non-compliance concerning marketing communications		No significant incidents of non-compliance concerning marketing communications were reported in 2020 (2019:0; 2018:0).	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data		Annual Report - Client privacy and data security, p59  During 2020, there were no severe leaks, thefts, or losses of customer data nor any complaints regarding breaches of customer privacy and losses of customer data (2019:0, 2018:0).	
419-1	Non-compliance with laws and regulations in the social and economic area		Annual Report - Key Figures, p14  No significant fines or sanctions were incurred during 2020 (2019:0, 2018:1). NIBC defines significant fines to be those exceeding ten thousand euros received from a regulator or authority (see definitions on p369 of our Annual Report). No other significant non-monetary sanctions were reported.	

## Additional Disclosures

GRI	Disclosure Title	Core	NIBC Disclosure (specific annual report page references refer to the NIBC Holding NV annual report)
<b>GRI-FS1</b>	Policies with specific environmental and social components applied to business lines.		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Business Review, p23</li> <li>- Sustainability, p60-65</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>Environmental and human rights standards that apply to our corporate clients are described in our Sustainability Framework and Sustainability policies.</p>
<b>GRI-FS2</b>	Procedures for assessing and screening environmental and social risks in business lines.		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Sustainability, p60-65</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>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Our procedures for managing environmental, human rights and governance risks are described in our Sustainability Policy Framework.</p>
<b>GRI-FS3</b>	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements of transactions.		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Business Review, p23</li> <li>- Due diligence and monitoring, p62</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>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>Our processes for monitoring client's implementation of and compliance with environmental and social compliance are described in our Sustainability Policy Framework.</p>
<b>GRI-FS4</b>	Process(es) for improving staff competency to implement the environmental and social policies and procedures.		<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Sustainability, p60-65</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>- TCFD Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> <li>- Sustainability Report (<a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a>)</li> </ul> <p>During 2020, NIBC undertook mandatory trainings, workshops and e-learnings for all staff in regard to our Code of Conduct, compliance and whistleblowing policies. 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>

<b>GRI-F55</b>	Interactions with clients/ investors/ business partners regarding environmental and social risks and opportunities.	<p>Annual Report</p> <ul style="list-style-type: none"> <li>- Sustainability, p60-65</li> <li>- Stakeholder engagement and materiality, p65-69</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>
<b>GRI-F56</b>	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>- What we do, p6</li> <li>- Operating Income per sector per country, p163</li> <li>- Corporate Loan Distribution, p276</li> </ul> <p>Website</p> <ul style="list-style-type: none"> <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> <p>Detailed figures are stated throughout our annual report, pillar III report, and in our NACE supplement. Interim figures are available in investor presentations on our corporate website. Further information is also provided in our capital markets updates.</p>
<b>GRI-F58</b>	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> <p>In this report, we also provided an initial assessment of the alignment of our portfolio with the EU Green Taxonomy including a preliminary Green Asset Ratio (GAR) and total Taxonomy-aligned exposures.</p>
<b>GRI-F59</b>	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, p345-346</li> </ul> <p>Internal audits are performed on key figures and the underlying environmental and social (sustainability) risk processes. For 2020, no external 3<sup>rd</sup> party audit was performed. Internal Audit confirmed that nothing has come to the attention that causes them to believe that the reported nonfinancial key figures for NIBC Holding N.V. are inadequately presented, in all material respects, in accordance with the reporting criteria.</p>
<b>GRI-F510</b>	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> <li>- Sustainability, p60-65</li> <li>- Stakeholder engagement and materiality, p65-69</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.</p> <p>By policy, 100% of corporate clients and transactions are subject to sustainability screening, NIBC also reports the number of higher sustainability risk transactions the bank has considered during the year as a non financial key figure.</p> <p>However we do not report the overall number of companies or the percentage where further interaction has taken place.</p> <p>In cases where potential issues are identified, NIBC interacts with clients to mitigate or avoid harm. For certain sectors, additional measures are implemented. For example, for potential financings in the shipping sector, we interact on environmental and social issues with clients of all potential financings as per our commitments under the Responsible Ship Recycling Standards (RSRS).</p>

<b>GRI-FS11</b>	Percentage of assets subject to positive and negative environmental or social screening.	Annual Report - Key Figures, p14 Website - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	By policy, all corporate clients and corporate transactions (100%) are subject to a positive and negative screening by mean of a sustainability assessment. This process includes environmental, human rights and governance aspects.
<b>GRI-FS15</b>	Policies for the fair design and sale of financial products and services	Annual Report - Business Review, p25 - Due diligence and monitoring, p62  Website - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	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).  These operational risk management include checks to ensure fairness to clients (duty of care) and that sustainability aspects (environment, social, governance) are well-considered as part of the approval processes. Additional testing is performed from time to time to ensure our high standards are maintained.
<b>GRI-FS16</b>	Initiatives to enhance financial literacy by type of beneficiary	Annual Report - Community Engagement, p70 - NIBC NGO Boulevard, p71  Website - Sustainability Report ( <a href="http://nibc.com/about-nibc/sustainability/">nibc.com/about-nibc/sustainability/</a> )	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 2020, unfortunately the event was cancelled due to the pandemic. Typically around 700 students participated in money lessons led by an NIBC employee.

## Where to find more information

Additional information on our financial and non-financial performance is reported in NIBC's Annual Report, GRI Content Index, Pillar III report, TCFD Report and other disclosures. Additional information regarding NIBC's corporate governance and sustainability policies are available on our website.

### Reports:

Annual Report: [nibc.com/about-nibc/investor-relations/annual-reports/](http://nibc.com/about-nibc/investor-relations/annual-reports/)

Pillar III: [nibc.com/about-nibc/investor-relations/annual-reports/](http://nibc.com/about-nibc/investor-relations/annual-reports/)

NACE supplement: [nibc.com/about-nibc/investor-relations/annual-reports/](http://nibc.com/about-nibc/investor-relations/annual-reports/)

Sustainability Report: [nibc.com/about-nibc/sustainability/](http://nibc.com/about-nibc/sustainability/)

UN Global Compact COP: [nibc.com/about-nibc/sustainability/](http://nibc.com/about-nibc/sustainability/)

Equator Principles: [nibc.com/about-nibc/sustainability/](http://nibc.com/about-nibc/sustainability/)

Modern Slavery Statement: [nibc.com/about-nibc/sustainability/](http://nibc.com/about-nibc/sustainability/)

TCFD Report: [nibc.com/about-nibc/sustainability](http://nibc.com/about-nibc/sustainability)

### Policies:

Corporate Governance Policies: [nibc.com/about-nibc/corporate-governance/](http://nibc.com/about-nibc/corporate-governance/)

Sustainability Policies: [nibc.com/about-nibc/sustainability/sustainability-governance/](http://nibc.com/about-nibc/sustainability/sustainability-governance/)

## Feedback Appreciated

Your feedback on our sustainability disclosures is appreciated.

If you have any questions, can't find something, prefer that we begin to report an aspect that we haven't 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)