



JOANNA ERDMAN

Vice-President of the Management Board of ING Bank Śląski S.A.

Integrity above all

ING operations touch many lives: customers, employees, shareholders, suppliers and the society. Each individual within these groups can and should expect us to act with integrity. Balancing the rights and interests of all involved is key to our ongoing viability. For us, success will only be achieved if we act with integrity.

Our purpose at ING is to empower people to stay a step ahead in life and in business. The Orange Code is our manifest for how we go about achieving this purpose: a declaration of who we are. It describes what we can expect from each other when we turn up to work each day. A set of standards that we collectively value, strive to live up to, and invite others to measure us by.

The Orange Code is an important element of our corporate culture and constitutes the basis of the business ethics standards and its elements at our bank. It determines the manner in which the strategic objective of the Bank – empowering people to stay a step ahead in life and in business – is delivered. Simply speaking, the Orange Code defines our banking identity. It is the sum of two parts:

ING Values – the principles and promises that we keep to our external stakeholders :

- We are honest
- We are prudent
- We are responsible

and

ING Behaviours – the commitments that employees make towards each other and the standards by which we will measure each other's performance.

- You take it on and make it happen
- You help others to be successful
- You are always a step ahead.

These values and behaviours are applied in many banking processes, including the recruitment process, in the employee performance evaluation and other.

An important document that supports our Bank in the integrity of our activities towards employees is the Diversity Policy, which ensures equal treatment and friendly work environment for all employees and candidates. This document explains what diversity means to us, why it is important, and what we do to promote it. It support the organization in attracting and retaining the best and brightest talent. It allows us to better understand different customer groups. It makes us more adaptable, helps us avoid group-think, and contributes to disrupting the status quo. In the end, diversity is good for our business because different perspectives drive innovation, accelerate growth, and lead to more robust decisions and outcomes.

Employee issues are also an element of the Sustainability Strategy of ING Bank Śląski S.A. in which, as employees, we commit, among others to support our business clients and partners in doing business in a sustainable way. The chief directions of the Sustainability Strategy for 2018-2021 are: Bank for entrepreneurial people, Bank of equal opportunities, Bank of green investment projects and Bank which is eco-aware.

Bank for entrepreneurial people

We help clients take the financial decisions which are best for them.

We believe that the protection of the natural environment and its resources are an integral part of the ethical standards we abide by. We manage our footprint on the environment on which we act. We undertake actions intended at protecting the environment and engage in various initiatives and promote pro-ecological attitudes.

We support enterprises in the development of their businesses. We inspire the enterprising who think about setting up their own business. We educate people in finance, starting from children to entrepreneurs. We are with our clients during big moments in their lives.

Bank of equal opportunities

We are open to everybody. We remove barriers hindering access to our services. We strive after simple communication with our clients and employees.

We promote diversity at work place because it helps us create new ideas and solutions that are key to success. We treat everyone with respect.

Bank of green investment projects

We support and promote natural environment protection solutions. We are active in designing and offering new products, supporting green ventures, raising environmental awareness and managing environmental and social risk. We help our clients with energy transformation.

Bank which is eco-aware

We strive after minimizing adverse environmental impact of our activity. We run information campaigns which lead to a lower use of resources and raise ecology awareness and sensitivity of employees.

As a bank we are customer-centric and we sustain partner-like relations with each vendor. With that initiative in mind we emphasised the importance of unbiased sourcing and that the procurement decisions need to be based solely on objective criteria.

All vendors represent that they observe the standards set forth in ING Bank Śląski S.A. Vendors Code of Conduct. The key standards include: observing the applicable laws, employees' rights included, in relations with the employees as well as respecting personal dignity, privacy and rights of an individual. Vendors should also provide their

employees with safe and harmless workplace in health terms and consider environment protection by striving for reducing environmental burden as part of their business and undertaking actions leading to environment improvement. Moreover, vendors should observe prohibition of forced labour, child labour, corruption and discrimination. Sustainable development includes activities in many areas important to society and the economy, as well as the responsibility and concern for the results of these activities. This applies not only to the business itself, but also to our employees and their families, local communities with whom we cooperate and the natural environment that we use and which we are a part of. That is why in December 2017, ING Bank Śląski announced the Environmental Policy, according to which projects implemented for the sake of the natural environment are a priority in the Bank's business activities.

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We are aware of the perils arising from irresponsible and excessive usage of natural resources. We do our best to counteract them that is why we support green and eco-awareness building solutions. We want to help clients with energy transformation and switching to low-carbon business.

All of the above examples indicate the principles that ensure the integrity of ING Bank Śląski S.A. operations, including ensuring compliance with legal and regulatory requirements, included those set out by the Polish Financial Supervision Authority and the Code of Banking Ethics adopted by the Polish Bank Association in 2013, as well as ethical standards binding in the financial services sector. However, above all, they serve to build trust and our relationships with each other, our clients, business partners and the world.

