

Financial Services
Netherlands
Update

ING Group

Ratings

Foreign Currency	
Long-Term IDR	A
Short-Term IDR	F1
Support Rating	1
Support Rating Floor	A
Sovereign Risk	
Foreign-Currency Long-Term IDR	AAA
Local-Currency Long-Term IDR	AAA

Outlooks

Foreign-Currency Long-Term IDR	Stable
Sovereign Foreign-Currency Long-Term IDR	Stable
Sovereign Foreign-Currency Long-Term IDR	Stable

Financial Data

ING Group	30 Jun 10	31 Dec 09
Total assets (USDm)	1,561,600	1,676,333
Total assets (EURm)	1,272,595	1,163,643
Total equity (EURm)	42,634	34,778
Operating profit (EURm)	3,025	-731
Published net income (EURm)	2,453	-1,053
Comprehensive income (EURm)	7,818	9,534
Operating ROAA (%)	0.50	-0.06
Operating ROAE (%)	15.76	-2.36
Equity/total assets (%)	3.35	2.99

Analysts

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Related Research

Applicable Criteria

- *Global Financial Institutions Rating Criteria* (August 2010)
- *Bank Holding Companies* (December 2009)
- *Rating Hybrid Securities* (December 2009)
- *Equity Credit for Hybrids & Other Capital Securities* (December 2009)
- *Short-Term Ratings Criteria for Corporate Finance* (June 2007)
- *Insurance Rating Methodology* (August 2010)
- *Fitch's Approach to Rating Insurance Groups* (March 2010)
- *Life Insurance Rating Methodology* (March 2010)
- *Non-Life Insurance Rating Methodology* (March 2010)

Rating Rationale

- ING Group's IDRs, Support Rating and Support Rating Floor reflect potential support from the Dutch state ('AAA'/Stable), if needed. The Long-Term IDR of ING Bank ('A+'/Stable), which also reflects potential support from the Dutch state, is higher than that of ING Group. However, the IDR of ING Group's insurance subsidiary, ING Verzekeringen, is lower ('A-'). As the group intends to divest its insurance operations by end-2013, they will no longer benefit from being part of a larger group and therefore will have less financial flexibility.
- Group operating profitability is improving in 2010 after having suffered from significant securities impairments in 2009 and 2008. Impairments were mostly on fixed-income securities (EUR2.2bn in 2009), essentially on Alt A RMBS largely held by the bank, and to a lesser extent on equities (EUR 0.3bn), mainly held at the insurance operations. Fitch does not expect further impairments on Alt A RMBS to be as large as the Dutch state assumed 80% of the economic risk of this portfolio written down to 90% of par in Q109. Moreover, revaluation reserves on Alt A RMBS have recovered.
- ING Group's operating profit in H110 came essentially from banking activities, which represented 95% of underlying pre-tax profit according to ING (with insurance activities representing the remaining 5%). ING Bank's operating profitability has been rising, owing to higher net interest income and decreasing operating expenses. Although loan impairment charges rose significantly in 2009, it appears that a peak was reached, as impairment charges fell in H110.
- After the significant hybrid capital from the Dutch state (EUR10bn for ING Group, which in turn injected EUR5bn of capital into ING Bank and EUR4bn into ING Verzekeringen) the group has agreed a restructuring plan with the European Commission. ING Group has already paid back EUR5bn using the proceeds of a share capital issue launched in December 2009. The sale of insurance operations and retained earnings are expected to cover the reimbursement of the remaining state hybrid capital (EUR5bn) and holding company debt (EUR7bn). Group double leverage is acceptable (11% debt/debt + equity at end-H110).

Support

- Fitch considers there to be an extremely high probability that further support from the Dutch authorities would be forthcoming if needed, due to ING Group's importance to the domestic economy. ING Group does not have a licence from the Dutch regulatory authorities, but both ING Bank and ING Verzekeringen do.

Key Rating Drivers

- Downside risk for the ING Group's Long-Term IDR is limited as it is at its Support Rating Floor. No upside potential is likely until the insurance operations are sold and the state hybrid capital and holding company debt are repaid. Once this happens, ING Group will probably review its corporate structure.

Profile

ING Group has two main subsidiaries: ING Bank, which contains most of the banking businesses, and ING Verzekeringen, which contains most of the insurance activities. However, for management reporting purposes, the group is split between ING Banking and ING Insurance, which correspond closely to the legal entities.

ING Group Income Statement

	30 Jun 2010			31 Dec 2009		31 Dec 2008		31 Dec 2007	
	6 Months - Interim	6 Months - Interim	As % of	Year End	As % of	Year End	As % of	Year End	As % of
	USDm Unaudited	EURm Unaudited	Earning Assets	EURm Unqualified	Earning Assets	EURm Unqualified	Earning Assets	EURm not seen	Earning Assets
1. Interest Income on Loans	n.a.	n.a.	-	25,007.0	2.31	31,150.0	2.54	26,364.0	2.11
2. Other Interest Income	39,647.6	32,310.0	5.40	14,820.0	1.37	21,768.0	1.77	21,002.0	1.68
3. Dividend Income	158.3	129.0	0.02	218.0	0.02	730.0	0.06	820.0	0.07
4. Gross Interest and Dividend Income	39,805.9	32,439.0	5.42	40,045.0	3.71	53,648.0	4.37	48,186.0	3.86
5. Interest Expense on Customer Deposits	n.a.	n.a.	-	10,976.0	1.02	19,594.0	1.60	18,563.0	1.49
6. Other Interest Expense	32,137.7	26,190.0	4.38	17,192.0	1.59	23,260.0	1.89	20,929.0	1.68
7. Total Interest Expense	32,137.7	26,190.0	4.38	28,168.0	2.61	42,854.0	3.49	39,492.0	3.16
8. Net Interest Income	7,668.1	6,249.0	1.04	11,877.0	1.10	10,794.0	0.88	8,694.0	0.70
9. Net Gains (Losses) on Trading and Derivatives	1,980.5	1,614.0	0.27	-3,551.0	-0.33	1,551.0	0.13	558.0	0.04
10. Net Gains (Losses) on Other Securities	3,677.6	2,997.0	0.50	5,608.0	0.52	8,754.0	0.71	12,718.0	1.02
11. Net Gains (Losses) on Assets at FV through Income Statement	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
12. Net Insurance Income	-3,983.2	-3,246.0	-0.54	-492.0	-0.05	-5,673.0	-0.46	-2,015.0	-0.16
13. Net Fees and Commissions	2,726.6	2,222.0	0.37	4,613.0	0.43	4,965.0	0.40	4,827.0	0.39
14. Other Operating Income	1,508.1	1,229.0	0.21	691.0	0.06	644.0	0.05	885.0	0.07
15. Total Non-Interest Operating Income	5,909.7	4,816.0	0.80	6,869.0	0.64	10,241.0	0.83	16,973.0	1.36
16. Personnel Expenses	4,632.3	3,775.0	0.63	7,338.0	0.68	8,764.0	0.71	8,261.0	0.66
17. Other Operating Expenses	3,532.8	2,879.0	0.48	6,682.0	0.62	6,970.0	0.57	6,759.0	0.54
18. Total Non-Interest Expenses	8,165.1	6,654.0	1.11	14,020.0	1.30	15,734.0	1.28	15,020.0	1.20
19. Equity-accounted Profit/ Loss - Operating	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
20. Pre-Impairment Operating Profit	5,412.7	4,411.0	0.74	4,726.0	0.44	5,301.0	0.43	10,647.0	0.85
21. Loan Impairment Charge	1,180.5	962.0	0.16	2,973.0	0.28	1,280.0	0.10	125.0	0.01
22. Securities and Other Credit Impairment Charges	520.3	424.0	0.07	2,484.0	0.23	4,820.0	0.39	186.0	0.01
23. Operating Profit	3,712.0	3,025.0	0.51	-731.0	-0.07	-799.0	-0.07	10,336.0	0.83
24. Equity-accounted Profit/ Loss - Non-operating	110.4	90.0	0.02	-461.0	-0.04	-404.0	-0.03	740.0	0.06
25. Non-recurring Income	474.9	387.0	0.06	264.0	0.02	17.0	0.00	430.0	0.03
26. Non-recurring Expense	392.7	320.0	0.05	597.0	0.06	144.0	0.01	445.0	0.04
27. Change in Fair Value of Own Debt	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
28. Other Non-operating Income and Expenses	n.a.	n.a.	-	n.a.	-	-157.0	-0.01	-18.0	0.00
29. Pre-tax Profit	3,904.6	3,182.0	0.53	-1,525.0	-0.14	-1,487.0	-0.12	11,043.0	0.88
30. Tax expense	894.6	729.0	0.12	-472.0	-0.04	-721.0	-0.06	1,535.0	0.12
31. Profit/Loss from Discontinued Operations	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
32. Net Income	3,010.1	2,453.0	0.41	-1,053.0	-0.10	-766.0	-0.06	9,508.0	0.76
33. Change in Value of AFS Investments	2,438.2	1,987.0	0.33	13,421.0	1.24	-18,876.0	-1.54	-1,508.0	-0.12
34. Revaluation of Fixed Assets	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
35. Currency Translation Differences	5,585.8	4,552.0	0.76	59.0	0.01	n.a.	-	n.a.	-
36. Remaining OCI Gains/ (losses)	-1,440.6	-1,174.0	-0.20	-2,893.0	-0.27	2,961.0	0.24	178.0	0.01
37. Fitch Comprehensive Income	9,593.5	7,818.0	1.31	9,534.0	0.88	-16,681.0	-1.36	8,178.0	0.66
38. Memo: Profit Allocation to Non-controlling Interests	n.a.	n.a.	-	-118.0	-0.01	-37.0	0.00	267.0	0.02
39. Memo: Net Income after Allocation to Non-controlling Interests	3,010.1	2,453.0	0.41	-935.0	-0.09	-729.0	-0.06	9,241.0	0.74
40. Memo: Common Dividends Relating to the Period	n.a.	n.a.	-	607.0	0.06	3,632.0	0.30	3,039.0	0.24
41. Memo: Preferred Dividends Related to the Period	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-

Exchange rate

USD1 = EUR0.81493

USD1 = EUR0.69416

USD1 = EUR0.71855

USD1 = EUR0.67930

ING Group Balance Sheet

	30 Jun 2010			31 Dec 2009		31 Dec 2008		31 Dec 2007	
	6 Months - Interim USDm	6 Months - Interim EURm	As % of Assets	Year End EURm	As % of Assets	Year End EURm	As % of Assets	Year End EURm	As % of Assets
Assets									
A. Loans									
1. Residential Mortgage Loans	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
2. Other Mortgage Loans	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
3. Other Consumer / Retail Loans	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
4. Corporate & Commercial Loans	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
5. Other Loans	758,387.8	618,033.0	48.56	583,410.0	50.14	622,376.0	46.74	554,982.0	42.28
6. Less: Reserves for Impaired Loans/ NPLs	6,479.1	5,280.0	0.41	4,464.0	0.38	2,585.0	0.19	2,018.0	0.15
7. Net Loans	751,908.8	612,753.0	48.15	578,946.0	49.75	619,791.0	46.54	552,964.0	42.13
8. Gross Loans	758,387.8	618,033.0	48.56	583,410.0	50.14	622,376.0	46.74	554,982.0	42.28
9. Memo: Impaired Loans included above	12,961.8	10,563.0	0.83	11,983.0	1.03	8,592.0	0.65	5,219.0	0.40
10. Memo: Loans at Fair Value included above	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
B. Other Earning Assets									
1. Loans and Advances to Banks	68,851.3	56,109.0	4.41	43,397.0	3.73	48,447.0	3.64	48,875.0	3.72
2. Trading Securities and at FV through Income	174,196.6	141,958.0	11.16	69,994.0	6.02	88,453.0	6.64	164,621.0	12.54
3. Derivatives	19,504.7	15,895.0	1.25	53,082.0	4.56	88,409.0	6.64	36,229.0	2.76
4. Available for Sale Securities	275,350.0	224,391.0	17.63	197,703.0	16.99	242,852.0	18.24	275,897.0	21.02
5. Held to Maturity Securities	15,611.2	12,722.0	1.00	14,409.0	1.24	15,440.0	1.16	16,753.0	1.28
6. At-equity Investments in Associates	4,698.6	3,829.0	0.30	3,699.0	0.32	4,355.0	0.33	5,014.0	0.38
7. Other Securities	384.1	313.0	0.02	5,517.0	0.47	8,277.0	0.62	11,453.0	0.87
8. Total Securities	489,745.1	399,108.0	31.36	344,404.0	29.60	447,786.0	33.63	509,967.0	38.85
9. Memo: Government Securities included Above	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
10. Investments in Property	4,551.3	3,709.0	0.29	n.a.	-	n.a.	-	4,829.0	0.37
11. Insurance Assets	165,485.4	134,859.0	10.60	110,077.0	9.46	104,846.0	7.87	131,393.0	10.01
12. Other Earning Assets	n.a.	n.a.	-	3,638.0	0.31	7,443.0	0.56	n.a.	-
13. Total Earning Assets	1,480,541.9	1,206,538.0	94.81	1,080,462.0	92.85	1,228,313.0	92.24	1,248,028.0	95.09
C. Non-Earning Assets									
1. Cash and Due From Banks	16,400.2	13,365.0	1.05	15,390.0	1.32	22,045.0	1.66	12,406.0	0.95
2. Memo: Mandatory Reserves included above	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
3. Foreclosed Real Estate	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
4. Fixed Assets	7,558.9	6,160.0	0.48	6,119.0	0.53	6,396.0	0.48	6,237.0	0.48
5. Goodwill	4,178.3	3,405.0	0.27	3,071.0	0.26	3,070.0	0.23	2,245.0	0.17
6. Other Intangibles	3,546.3	2,890.0	0.23	2,950.0	0.25	3,845.0	0.29	3,495.0	0.27
7. Current Tax Assets	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
8. Deferred Tax Assets	n.a.	n.a.	-	3,969.0	0.34	8,034.0	0.60	2,723.0	0.21
9. Discontinued Operations	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
10. Other Assets	49,374.8	40,237.0	3.16	51,682.0	4.44	59,960.0	4.50	37,376.0	2.85
11. Total Assets	1,561,600.4	1,272,595.0	100.00	1,163,643.0	100.00	1,331,663.0	100.00	1,312,510.0	100.00
Liabilities and Equity									
D. Interest-Bearing Liabilities									
1. Customer Deposits - Current	627,370.4	511,263.0	40.17	112,132.0	9.64	178,916.0	13.44	163,938.0	12.49
2. Customer Deposits - Savings	n.a.	n.a.	-	304,104.0	26.13	263,637.0	19.80	275,127.0	20.96
3. Customer Deposits - Term	n.a.	n.a.	-	53,272.0	4.58	80,230.0	6.02	86,151.0	6.56
4. Total Customer Deposits	627,370.4	511,263.0	40.17	469,508.0	40.35	522,783.0	39.26	525,216.0	40.02
5. Deposits from Banks	104,968.5	85,542.0	6.72	84,235.0	7.24	152,265.0	11.43	166,972.0	12.72
6. Other Deposits and Short-term Borrowings	n.a.	n.a.	-	75,015.0	6.45	62,852.0	4.72	42,386.0	3.23
7. Total Deposits, Money Market and Short-term Funding	732,339.0	596,805.0	46.90	628,758.0	54.03	737,900.0	55.41	734,574.0	55.97
8. Senior Debt Maturing after 1 Year	n.a.	n.a.	-	68,117.0	5.85	64,834.0	4.87	51,667.0	3.94
9. Subordinated Borrowing	13,905.5	11,332.0	0.89	10,099.0	0.87	10,281.0	0.77	7,325.0	0.56
10. Other Funding	185,377.9	151,070.0	11.87	n.a.	-	n.a.	-	n.a.	-
11. Total Long Term Funding	199,283.4	162,402.0	12.76	78,216.0	6.72	75,115.0	5.64	58,992.0	4.49
12. Derivatives	27,168.0	22,140.0	1.74	60,301.0	5.18	94,140.0	7.07	35,510.0	2.71
13. Trading Liabilities	160,478.8	130,779.0	10.28	69,488.0	5.97	94,258.0	7.08	134,311.0	10.23
14. Total Funding	1,119,269.1	912,126.0	71.67	836,763.0	71.91	1,001,413.0	75.20	963,387.0	73.40
E. Non-Interest Bearing Liabilities									
1. Fair Value Portion of Debt	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
2. Credit impairment reserves	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
3. Reserves for Pensions and Other	n.a.	n.a.	-	2,155.0	0.19	2,380.0	0.18	2,057.0	0.16
4. Current Tax Liabilities	n.a.	n.a.	-	1,225.0	0.11	940.0	0.07	877.0	0.07
5. Deferred Tax Liabilities	n.a.	n.a.	-	2,399.0	0.21	3,602.0	0.27	3,432.0	0.26
6. Other Deferred Liabilities	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
7. Discontinued Operations	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
8. Insurance Liabilities	333,270.3	271,592.0	21.34	240,858.0	20.70	240,790.0	18.08	265,712.0	20.24
9. Other Liabilities	50,609.3	41,243.0	3.24	40,465.0	3.48	53,610.0	4.03	37,493.0	2.86
10. Total Liabilities	1,503,148.7	1,224,961.0	96.26	1,123,865.0	96.58	1,302,735.0	97.83	1,272,958.0	96.99
F. Hybrid Capital									
1. Pref. Shares and Hybrid Capital accounted for as Debt	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
2. Pref. Shares and Hybrid Capital accounted for as Equity	6,135.5	5,000.0	0.39	5,000.0	0.43	10,000.0	0.75	21.0	0.00
G. Equity									
1. Common Equity	43,780.4	35,678.0	2.80	33,405.0	2.87	27,754.0	2.08	33,625.0	2.56
2. Non-controlling Interest	1,240.6	1,011.0	0.08	915.0	0.08	1,594.0	0.12	2,323.0	0.18
3. Securities Revaluation Reserves	5,313.3	4,330.0	0.34	1,268.0	0.11	-12,483.0	-0.94	4,937.0	0.38
4. Foreign Exchange Revaluation Reserves	1,994.0	1,625.0	0.13	-2,008.0	-0.17	n.a.	-	n.a.	-
5. Fixed Asset Revaluations and Other Accumulated OCI	-12.3	-10.0	0.00	1,198.0	0.10	2,063.0	0.15	-1,354.0	-0.10
6. Total Equity	52,316.1	42,634.0	3.35	34,778.0	2.99	18,928.0	1.42	39,531.0	3.01
7. Total Liabilities and Equity	1,561,600.4	1,272,595.0	100.00	1,163,643.0	100.00	1,331,663.0	100.00	1,312,510.0	100.00
8. Memo: Fitch Core Capital	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
9. Memo: Fitch Eligible Capital	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-

Exchange rate

USD1 = EUR0.81493

USD1 = EUR0.69416

USD1 = EUR0.71855

USD1 = EUR0.67930

ING Group Summary Analytics

	30 Jun 2010	31 Dec 2009	31 Dec 2008	31 Dec 2007
	6 Months - Interim	Year End	Year End	Year End
A. Interest Ratios				
1. Interest Income on Loans/ Average Gross Loans	n.a.	4.14	5.19	5.11
2. Interest Expense on Customer Deposits/ Average Customer Deposits	n.a.	2.26	3.66	3.60
3. Interest Income/ Average Earning Assets	5.72	3.49	4.25	3.95
4. Interest Expense/ Average Interest-bearing Liabilities	6.04	3.11	4.23	4.23
5. Net Interest Income/ Average Earning Assets	1.10	1.04	0.86	0.71
6. Net Int. Inc Less Loan Impairment Charges/ Av. Earning Assets	0.93	0.78	0.75	0.70
7. Net Interest Inc Less Preferred Stock Dividend/ Average Earning Assets	1.10	1.04	0.86	0.71
B. Other Operating Profitability Ratios				
1. Non-Interest Income/ Gross Revenues	43.52	36.64	48.69	66.13
2. Non-Interest Expense/ Gross Revenues	60.14	74.79	74.80	58.52
3. Non-Interest Expense/ Average Assets	1.10	1.14	1.17	1.17
4. Pre-impairment Op. Profit/ Average Equity	22.98	15.23	18.59	26.39
5. Pre-impairment Op. Profit/ Average Total Assets	0.73	0.38	0.39	0.83
6. Loans and securities impairment charges/ Pre-impairment Op. Profit	31.42	115.47	115.07	2.92
7. Operating Profit/ Average Equity	15.76	-2.36	-2.80	25.62
8. Operating Profit/ Average Total Assets	0.50	-0.06	-0.06	0.80
9. Taxes/ Pre-tax Profit	22.91	30.95	48.49	13.90
10. Pre-Impairment Operating Profit / Risk Weighted Assets	n.a.	n.a.	n.a.	n.a.
11. Operating Profit / Risk Weighted Assets	n.a.	n.a.	n.a.	n.a.
C. Other Profitability Ratios				
1. Net Income/ Average Total Equity	12.78	-3.39	-2.69	23.57
2. Net Income/ Average Total Assets	0.41	-0.09	-0.06	0.74
3. Fitch Comprehensive Income/ Average Total Equity	40.73	30.73	-58.50	20.27
4. Fitch Comprehensive Income/ Average Total Assets	1.29	0.78	-1.24	0.64
5. Net Income/ Av. Total Assets plus Av. Managed Assets	n.a.	n.a.	n.a.	n.a.
6. Net Income/ Risk Weighted Assets	n.a.	n.a.	n.a.	n.a.
7. Fitch Comprehensive Income/ Risk Weighted Assets	n.a.	n.a.	n.a.	n.a.
D. Capitalization				
1. Fitch Eligible Capital/ Fitch Adjusted Weighted Risks	n.a.	n.a.	n.a.	n.a.
2. Tangible Common Equity/ Tangible Assets	2.87	2.15	0.30	2.38
3. Tangible Common Equity/ Total Business Volume	2.86	2.13	0.30	2.37
4. Tier 1 Regulatory Capital Ratio	n.a.	n.a.	n.a.	n.a.
5. Total Regulatory Capital Ratio	n.a.	n.a.	n.a.	n.a.
6. Fitch Eligible Capital/ Tier 1 Regulatory Capital	n.a.	n.a.	n.a.	n.a.
7. Equity/ Total Assets	3.35	2.99	1.42	3.01
8. Cash Dividends Paid & Declared/ Net Income	n.a.	-57.64	-474.15	31.96
9. Cash Dividend Paid & Declared/ Fitch Comprehensive Income	n.a.	6.37	-21.77	37.16
10. Net Income - Cash Dividends/ Total Equity	11.60	-4.77	-23.24	16.36
E. Loan Quality				
1. Growth of Total Assets	9.36	-12.62	1.46	7.03
2. Growth of Gross Loans	5.93	-6.26	12.14	16.32
3. Impaired Loans(NPLs)/ Gross Loans	1.71	2.05	1.38	0.94
4. Reserves for Impaired Loans/ Gross loans	0.85	0.77	0.42	0.36
5. Reserves for Impaired Loans/ Impaired Loans	49.99	37.25	30.09	38.67
6. Impaired Loans less Reserves for Imp Loans/ Equity	12.39	21.62	31.74	8.10
7. Loan Impairment Charges/ Average Gross Loans	0.32	0.49	0.21	0.02
8. Net Charge-offs/ Average Gross Loans	-0.17	0.18	n.a.	n.a.
9. Impaired Loans + Foreclosed Assets/ Gross Loans + Foreclosed Assets	1.71	2.05	1.38	0.94
F. Funding				
1. Loans/ Customer Deposits	120.88	124.26	119.05	105.67
2. Interbank Assets/ Interbank Liabilities	65.59	51.52	31.82	29.27

ING Group Reference Data

	30 Jun 2010			31 Dec 2009		31 Dec 2008		31 Dec 2007	
	6 Months - Interim USDm	6 Months - Interim EURm	As % of Assets	Year End EURm	As % of Assets	Year End EURm	As % of Assets	Year End EURm	As % of Assets
A. Off-Balance Sheet Items									
1. Managed Securitized Assets Reported Off-Balance Sheet	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
2. Other off-balance sheet exposure to securitizations	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
3. Guarantees	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
4. Acceptances and documentary credits reported off-balance sheet	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
5. Committed Credit Lines	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
6. Other Contingent Liabilities	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
7. Total Business Volume	1,561,600.4	1,272,595.0	100.00	1,163,643.0	100.00	1,331,663.0	100.00	1,312,510.0	100.00
8. Memo: Total Weighted Risks	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
9. Fitch Adjustments to Weighted Risks.	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
10. Fitch Adjusted Weighted Risks	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
B. Average Balance Sheet									
Average Loans	737,144.9	600,721.5	47.20	603,627.2	51.87	600,368.5	45.08	516,318.0	39.34
Average Earning Assets	1,403,188.0	1,143,500.0	89.86	1,147,281.4	98.59	1,262,341.5	94.79	1,219,439.0	92.91
Average Assets	1,494,752.9	1,218,119.0	95.72	1,228,595.6	105.58	1,347,483.3	101.19	1,286,083.0	97.99
Average Managed Assets (OBS)	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Average Interest-Bearing Liabilities	1,073,030.2	874,444.5	68.71	905,405.2	77.81	1,013,570.8	76.11	933,500.3	71.12
Average Common equity	42,385.8	34,541.5	2.71	33,908.8	2.91	29,707.3	2.23	31,626.7	2.41
Average Equity	47,496.1	38,706.0	3.04	31,029.2	2.67	28,514.0	2.14	40,340.7	3.07
Average Customer Deposits	601,751.7	490,385.5	38.53	485,981.8	41.76	535,270.5	40.20	516,279.0	39.34
C. Maturities									
Asset Maturities:									
Loans & Advances < 3 months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Loans & Advances 3 - 12 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Loans and Advances 1 - 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Loans & Advances > 5 years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Debt Securities < 3 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Debt Securities 3 - 12 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Debt Securities 1 - 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Debt Securities > 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank < 3 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank 3 - 12 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank 1 - 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank > 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Liability Maturities:									
Retail Deposits < 3 months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Retail Deposits 3 - 12 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Retail Deposits 1 - 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Retail Deposits > 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Other Deposits < 3 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Other Deposits 3 - 12 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Other Deposits 1 - 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Other Deposits > 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank < 3 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank 3 - 12 Months	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank 1 - 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Interbank > 5 Years	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Senior debt Maturing < 1 year	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Senior debt Maturing > 1 year	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Total Senior Debt on Balance Sheet	185,377.9	151,070.0	11.87	68,117.0	5.85	64,834.0	4.87	51,667.0	3.94
Fair Value Portion of Senior Debt	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Subordinated Debt maturing < 1 year	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Subordinated Debt maturing > 1 year	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
Total Subordinated Debt on Balance Sheet	13,905.5	11,332.0	0.89	10,099.0	0.87	10,281.0	0.77	7,325.0	0.56
Fair Value Portion of Subordinated Debt	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
D. Equity Reconciliation									
1. Equity	52,316.1	42,634.0	3.35	34,778.0	2.99	18,928.0	1.42	39,531.0	3.01
2. Add: Pref. Shares and Hybrid Capital accounted for as Equity	6,135.5	5,000.0	0.39	5,000.0	0.43	10,000.0	0.75	21.0	0.00
3. Add: Other Adjustments	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
4. Published Equity	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
E. Fitch Eligible Capital Reconciliation									
1. Total Equity as reported (including non-controlling interests)	52,316.1	42,634.0	3.35	34,778.0	2.99	18,928.0	1.42	39,531.0	3.01
2. Fair value effect incl in own debt/borrowings at fv on the B/S- CC only	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
3. Non-loss-absorbing non-controlling interests	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
4. Goodwill	4,178.3	3,405.0	0.27	3,071.0	0.26	3,070.0	0.23	2,245.0	0.17
5. Other intangibles	3,546.3	2,890.0	0.23	2,950.0	0.25	3,845.0	0.29	3,495.0	0.27
6. Deferred tax assets deduction	n.a.	n.a.	-	3,969.0	0.34	8,034.0	0.60	2,723.0	0.21
7. Net asset value of insurance subsidiaries	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
8. Embedded value of insurance business	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
9. First loss tranches of off-balance sheet securitizations	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
10. Fitch Core Capital	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
11. Eligible weighted Hybrid capital	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
12. Government held Hybrid Capital	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
13. Fitch Eligible Capital	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-
14. Eligible Hybrid Capital Limit	n.a.	n.a.	-	n.a.	-	n.a.	-	n.a.	-

Exchange Rate

USD1 = EUR0.81493

USD1 = EUR0.69416

USD1 = EUR0.71855

USD1 = EUR0.67930

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