Results of the 2011 EBA EU-wide stress test: Summary [1-3]

Name of the bank: ING Bank N.V.

Actual results at 31 December 2010	million EUR, %
Operating profit before impairments	7.999
Impairment losses on financial and non-financial assets in the banking book	-2.332
Risk weighted assets [4]	321.103
Core Tier 1 capital [4]	30.895
Core Tier 1 capital ratio, % [4]	9,6%
Additional capital needed to reach a 5 % Core Tier 1 capital benchmark	

Outcomes of the adverse scenario at 31 December 2012, excluding all mitigating actions taken in 2011	%
Core Tier 1 Capital ratio	8,7%

Outcomes of the adverse scenario at 31 December 2012, including recognised mitigating measures as of 30 April 2011	million EUR, %
2 yr cumulative operating profit before impairments	12.278
2 yr cumulative impairment losses on financial and non-financial assets in the banking book	-8.276
2 yr cumulative losses from the stress in the trading book	-1.052
of which valuation losses due to sovereign shock	*-237*
Risk weighted assets	391.282
Core Tier 1 Capital	33.860
Core Tier 1 Capital ratio (%)	**8,7%**
Additional capital needed to reach a 5 % Core Tier 1 capital benchmark	
Effects from the recognised mitigating measures put in place until 30 April 2011 [5]	
Equity raisings announced and fully committed between 31 December 2010 and 30 April 2011 (CT1 million EUR)	
Effect of government support publicly announced and fully committed in period from 31 December 2010 to 30 April 2011 on Core Tier 1 capital ratio (percentage points of CT1 ratio)	
Effect of mandatory restructuring plans, publicly announced and fully committed in period from 31 December 2010 to 30 April 2011 on Core Tier 1 capital ratio (percentage points of CT1 ratio)	

Additional taken or planned mitigating measures	percentage points contributing to capital ratio
Use of provisions and/or other reserves (including release of countercyclical provisions)	
Divestments and other management actions taken by 30 April 2011	
Other disinvestments and restructuring measures, including also future mandatory restructuring not yet approved with the EU Commission under the EU State Aid rules	0,7
Future planned issuances of common equity instruments (private issuances)	
Future planned government subscriptions of capital instruments (including hybrids)	-0,8
Other (existing and future) instruments recognised as appropriate back-stop measures by national supervisory authorities	
Supervisory recognised capital ratio after all current and future mitigating actions as of 31 December 2012, % [6]	8,6%

Notes

(1) The stress test was carried using the EBA common methodology, which includes a static balance sheet assumption and incorporates regulatory transitional floors, where binding (see http://www.eba.europa.eu/EU-wide-stress-testing/2011.aspx for the details on the EBA methodology).

(2) All capital elements and ratios are presented in accordance with the EBA definition of Core Tier 1 capital set up for the purposes of the EU-wide stress test, and therefore may differ from the definitions used by national supervisory authorities and/or reported by institutions in public disclosures.

(3) Neither baseline scenario nor the adverse scenario and results of the stress test should in any way be construed as a bank's forecast or directly compared to bank's other published information.

(4) Full static balance sheet assumption excluding any mitigating management actions, mandatory restructuring or capital raisings post 31 December 2010 (all government support measures and capital raisings fully paid in before 31 December 2010 are included).

(5) Effects of capital raisings, government support and mandatory restructuring plans publicly announced and fully committed in period from 31 December 2010 to 30 April 2011, which are incorporated in the Core Tier 1 capital ratio reported as the outcome of the stress test.

(6) The supervisory recognised capital ratio computed on the basis of additional mitigating measures presented in this section. The ratio is based primarily on the EBA definition, but may include other mitigating measures not recognised by the EBA methodology as having impacts in the Core Tier 1 capital, but which are considered by the national supervisory authorities as appropriate mitigating measures for the stressed conditions. Where applicable, such measures are explained in the additional announcements issued by banks/national supervisory authorities. Details of all mitigating measures are presented in the worksheet "3 - Mitigating measures).

Results of the 2011 EBA EU-wide stress test: Aggregate information and evolution of capital [1-4]

Name of the bank: ING Bank N.V.

All in million EUR, or %

A. Results of the stress test based on the **full static balance sheet assumption** without any mitigating actions, mandatory restructuring or capital raisings post 31 December 2010 (all government support measures fully paid in before 31 December 2010 are included)

Capital adequacy	2010	Baseline scenario 2011	Baseline scenario 2012	Adverse scenario 2011	Adverse scenario 2012
Risk weighted assets (full static balance sheet assumption)	321.103	335.421	338.905	366.922	391.282
Common equity according to EBA definition	28.395	32.885	37.138	30.064	31.360
of which ordinary shares subscribed by government	*0*	*0*	*0*	*0*	*0*
Other existing subscribed government capital (before 31 December 2010)	2.500	2.500	2.500	2.500	2.500
Core Tier 1 capital (full static balance sheet assumption)	30.895	35.385	39.638	32.564	33.860
Core Tier 1 capital ratio (%)	**9,6%**	**10,5%**	**11,7%**	**8,9%**	**8,7%**

B. Results of the stress test recognising capital issuance and mandatory restructuring plans publicly announced and fully committed before 31 December 2010

Capital adequacy	2010	Baseline scenario 2011	Baseline scenario 2012	Adverse scenario 2011	Adverse scenario 2012
Risk weighted assets (full static balance sheet assumption)	321.103	335.421	338.905	366.922	391.282
Effect of mandatory restructuring plans, publicly announced and fully committed before 31 December 2010 on RWA (+/-)					
Risk weighted assets after the effects of mandatory restructuring plans publicly announced and fully committed before 31 December 2010	321.103	335.421	338.905	366.922	391.282
Core Tier 1 Capital (full static balance sheet assumption)	30.895	35.385	39.638	32.564	33.860
Effect of mandatory restructuring plans, publicly announced and fully committed before 31 December 2010 on Core Tier 1 capital (+/-)					
Core Tier 1 capital after the effects of mandatory restructuring plans publicly announced and fully committed before 31 December 2010	30.895	35.385	39.638	32.564	33.860
Core Tier 1 capital ratio (%)	**9,6%**	**10,5%**	**11,7%**	**8,9%**	**8,7%**

C. Results of the stress test recognising capital issuance and mandatory restructuring plans publicly announced and fully committed before 30 April 2011

Capital adequacy	2010	Baseline scenario 2011	Baseline scenario 2012	Adverse scenario 2011	Adverse scenario 2012
Risk weighted assets after the effects of mandatory restructuring plans publicly announced and fully committed before 31 December 2010	321.103	335.421	338.905	366.922	391.282
Effect of mandatory restructuring plans, publicly announced and fully committed in period from 31 December 2010 to 30 April 2011 on RWA (+/-)					
Risk weighted assets after the effects of mandatory restructuring plans publicly announced and fully committed before 30 April 2011		335.421	338.905	366.922	391.282
of which RWA in banking book		243.729	243.729	263.415	273.486
of which RWA in trading book		15.138	15.138	15.138	15.138
RWA on securitisation positions (banking and trading book)		19.064	22.549	30.879	45.168
Total assets after the effects of mandatory restructuring plans publicly announced and fully committed and equity raised and fully committed by 30 April 2011	*933.073*	933.073	933.073	933.073	933.073
Core Tier 1 capital after the effects of mandatory restructuring plans publicly announced and fully committed before 31 December 2010	30.895	35.385	39.638	32.564	33.860
Equity raised between 31 December 2010 and 30 April 2011					
Equity raisings fully committed (but not paid in) between 31 December 2010 and 30 April 2011					
Effect of government support publicly announced and fully committed in period from 31 December 2010 to 30 April 2011 on Core Tier 1 capital (+/-)					
Effect of mandatory restructuring plans, publicly announced and fully committed in period from 31 December 2010 to 30 April 2011 on Core Tier 1 capital (+/-)					
Core Tier 1 capital after government support, capital raisings and effects of restructuring plans fully committed by 30 April 2011		35.385	39.638	32.564	33.860
Tier 1 capital after government support, capital raisings and effects of restructuring plans fully committed by 30 April 2011		*43.822*	*48.076*	*41.002*	*42.298*
Total regulatory capital after government support, capital raisings and effects of restructuring plans fully committed by 30 April 2011		*50.078*	*52.287*	*46.877*	*46.314*
Core Tier 1 capital ratio (%)	**9,6%**	**10,5%**	**11,7%**	**8,9%**	**8,7%**
Additional capital needed to reach a 5% Core Tier 1 capital benchmark					

Profit and losses	2010	Baseline scenario 2011	Baseline scenario 2012	Adverse scenario 2011	Adverse scenario 2012
Net interest income	13.587	13.431	13.410	12.827	12.763
Trading income	1.195	441	441	127	127
of which trading losses from stress scenarios		*-212*	*-212*	*-526*	*-526*
of which valuation losses due to sovereign shock				*-119*	*-119*
Other operating income [5]	247	247	247	247	247
Operating profit before impairments	7.999	7.090	7.069	6.171	6.107
Impairments on financial and non-financial assets in the banking book [6]	*-2.332*	*-1.188*	*-1.316*	*-3.978*	*-4.298*
Operating profit after impairments and other losses from the stress	5.667	5.901	5.752	2.193	1.809
Other income [5,6]	316	-26	-73	-43	-115
Net profit after tax [7]	4.575	4.406	4.260	1.613	1.270
of which carried over to capital (retained earnings)	*4.575*	*4.406*	*4.260*	*1.613*	*1.270*
of which distributed as dividends					

Additional information	2010	Baseline scenario 2011	Baseline scenario 2012	Adverse scenario 2011	Adverse scenario 2012
Deferred Tax Assets [(8)]	1.183	679	248	679	248
Stock of provisions [(9)]	5.195	6.345	7.641	8.706	12.555
of which stock of provisions for non-defaulted assets	1.051	874	862	1.028	1.234
of which Sovereigns [(10)]	5	4	4	22	45
of which Institutions [(10)]	23	16	15	58	114
of which Corporate (excluding Commercial real estate)	303	259	255	286	323
of which Retail (excluding Commercial real estate)	695	573	567	636	703
of which Commercial real estate [(11)]	25	22	22	24	44
of which stock of provisions for defaulted assets	4.144	5.471	6.779	7.678	11.321
of which Corporate (excluding Commercial real estate)	2.229	3.000	3.761	3.714	5.217
of which Retail (excluding commercial real estate)	1.569	1.995	2.416	2.901	4.198
of which Commercial real estate	331	368	403	810	1.421
Coverage ratio (%) [(12)]					
Corporate (excluding Commercial real estate)	37,8%	32,8%	30,5%	33,9%	33,9%
Retail (excluding Commercial real estate)	27,7%	22,9%	20,6%	21,0%	20,6%
Commercial real estate	14,3%	12,6%	11,4%	20,3%	24,7%
Loss rates (%) [(13)]					
Corporate (excluding Commercial real estate)	0,4%	0,3%	0,3%	0,6%	0,6%
Retail (excluding Commercial real estate)	0,2%	0,1%	0,1%	0,4%	0,3%
Commercial real estate	0,5%	0,1%	0,1%	1,2%	1,6%
Funding cost (bps)	180			219	262

D. Other mitigating measures (see Mitigating measures worksheet for details), million EUR [(14)]

All effects as compared to regulatory aggregates as reported in Section C		Baseline scenario 2011	Baseline scenario 2012	Adverse scenario 2011	Adverse scenario 2012
A) Use of provisions and/or other reserves (including release of countercyclical provisions), capital ratio effect [(6)]					
B) Divestments and other management actions taken by 30 April 2011, RWA effect (+/-)					
B1) Divestments and other business decisions taken by 30 April 2011, capital ratio effect (+/-)					
C) Other disinvestments and restructuring measures, including also future mandatory restructuring not yet approved with the EU Commission under the EU State Aid rules, RWA effect (+/-)		-29.285	-31.260	-28.036	-30.093
C1) Other disinvestments and restructuring measures, including also future mandatory restructuring not yet approved with the EU Commission under the EU State Aid rules, capital ratio effect (+/-)		652	-233	754	85
D) Future planned issuances of common equity instruments (private issuances), capital ratio effect					
E) Future planned government subscriptions of capital instruments (including hybrids), capital ratio effect		-3.000	-3.000	-3.000	-3.000
F) Other (existing and future) instruments recognised as appropriate back-stop measures by national supervisory authorities, RWA effect (+/-)					
F1) Other (existing and future) instruments recognised as appropriate back-stop measures by national supervisory authorities, capital ratio effect (+/-)					
Risk weighted assets after other mitigating measures (B+C+F)		306.136	307.645	338.886	361.189
Capital after other mitigating measures (A+B1+C1+D+E+F1)		33.037	36.406	30.318	30.945
Supervisory recognised capital ratio (%) [(15)]		***10,8%***	***11,8%***	***8,9%***	***8,6%***

Notes and definitions

(1) The stress test was carried using the EBA common methodology, which includes a static balance sheet assumption (see http://www.eba.europa.eu/EU-wide-stress-testing/2011.aspx for the details on the EBA methodology).

(2) All capital elements and ratios are presented in accordance with the EBA definition of Core Tier 1 capital set up for the purposes of the EU-wide stress test, and therefore may differ from the definitions used by national supervisory authorities and/or reported by institutions in public disclosures.

(3) Neither baseline scenario nor the adverse scenario and results of the stress test should in any way be construed as a bank's forecast or directly compared to bank's other published information.

(4) Regulatory transitional floors are applied where binding. RWA for credit risk have been calculated in accordance with the EBA methodology assuming an additional floor imposed at a level of RWA, before regulatory transitional floors, for December 2010 for both IRB and STA portfolios.

(5) Banks are required to provide explanations of what "Other operating income" and "Other income" constitutes for.

Composition of "Other operating income" and "Other income": ING "other operating income" covers investment income excluding impairments and valuation result on non-trading income ; "other income" in the scenario is mainly resulting from P&L impact from defined benefit pension assets.

(6) If under the national legislation, the release of countercyclical provisions and/or other similar reserves is allowed, this figure for 2010 could be included either in rows "Impairments on financial assets in the banking book" or "Other income" for 2010, whereas under the EU-wide stress test methodology such release for 2011-2012 should be reported in Section D as other mitigating measures.

(7) Net profit includes profit attributable to minority interests.

(8) Deferred tax assets as referred to in paragraph 69 of BCBS publication dated December 2010 : "Basel 3 – a global regulatory framework for more resilient banks and banking systems".

(9) Stock of provisions includes collective and specific provisions as well as countercyclical provisions, in the jurisdictions, where required by the national legislation.

(10) Provisions for non-defaulted exposures to sovereigns and financial institutions have been computed taking into account benchmark risk parameters (PDs and LGDs) provided by the EBA and referring to external credit ratings and assuming hypothetical scenario of rating agency downgrades of sovereigns.

(11) For definition of commercial real estate please refer to footnote (5) in the worksheet "4 - EADs".

(12) Coverage ratio = stock of provisions on defaulted assets / stock of defaulted assets expressed in EAD for the specific portfolio.

(13) Loss rate = total impairment flow (specific and collective impairment flow) for a year / total EAD for the specific portfolio (including defaulted and non-defaulted assets but excluding securitisation and counterparty credit risk exposures).

(14) All elements are be reported net of tax effects.

(15) The supervisory recognised capital ratio computed on the basis of additional mitigating measures presented in this section. The ratio is based primarily on the EBA definition, but may include other mitigating measures not recognised by the EBA methodology as having impacts in the Core Tier 1 capital, but which are considered by the national supervisory authorities as appropriate mitigating measures for the stressed conditions. Where applicable, such measures are explained in the additional announcements issued by banks/national supervisory authorities. Details of all mitigating measures are presented in the worksheet "3 - Mitigating measures).

Results of the 2011 EBA EU-wide stress test: Composition of capital as of 31 December 2010

Name of the bank: ING Bank N.V.

Situation at December 2010	December 2010 Million EUR	December 2010 % RWA	References to COREP reporting
A) Common equity before deductions (Original own funds without hybrid instruments and government support measures other than ordinary shares) (+)	**29.464**	9,2%	COREP CA 1.1 - hybrid instruments and government support measures other than ordinary shares
Of which: (+) eligible capital and reserves	28.442	8,9%	COREP CA 1.1.1 + COREP line 1.1.2.1
Of which: (-) intangibles assets (including goodwill)	-1.645	-0,5%	Net amount included in T1 own funds (COREP line 1.1.5.1)
Of which: (-/+) adjustment to valuation differences in other AFS assets (1)	-12	0,0%	Prudential filters for regulatory capital (COREP line 1.1.2.6.06)
B) Deductions from common equity (Elements deducted from original own funds) (-)	**-1.069**	-0,3%	COREP CA 1.3.T1* (negative amount)
Of which: (-) deductions of participations and subordinated claims	-432	-0,1%	Total of items as defined by Article 57 (l), (m), (n) (o) and (p) of Directive 2006/48/EC and deducted from original own funds (COREP lines from 1.3.1 to 1.3.5 included in line 1.3.T1*)
Of which: (-) securitisation exposures not included in RWA	-4	0,0%	COREP line 1.3.7 included in line 1.3.T1*
Of which: (-) IRB provision shortfall and IRB equity expected loss amounts (before tax)	-633	-0,2%	As defined by Article 57 (q) of Directive 2006/48/EC (COREP line 1.3.8 included in 1.3.T1*)
C) Common equity (A+B)	**28.395**	8,8%	
Of which: ordinary shares subscribed by government	0	0,0%	Paid up ordinary shares subscribed by government
D) Other Existing government support measures (+)	**2.500**	0,8%	
E) Core Tier 1 including existing government support measures (C+D)	**30.895**	9,6%	Common equity + Existing government support measures included in T1 other than ordinary shares
Difference from benchmark capital threshold (CT1 5%)	**14.840**	4,6%	Core tier 1 including government support measures - (RWA*5%)
F) Hybrid instruments not subscribed by government	**8.438**	2,6%	Net amount included in T1 own funds (COREP line 1.1.4.1a + COREP lines from 1.1.2.2***01 to 1.1.2.2***05 + COREP line 1.1.5.2a (negative amount)) not subscribed by government
Tier 1 Capital (E+F) (Total original own funds for general solvency purposes)	**39.332**	12,2%	COREP CA 1.4 = COREP CA 1.1 + COREP CA 1.3.T1* (negative amount)
Tier 2 Capital (Total additional own funds for general solvency purposes)	**9.813**	3,1%	COREP CA 1.5
Tier 3 Capital (Total additional own funds specific to cover market risks)			COREP CA 1.6
Total Capital (Total own funds for solvency purposes)	**49.145**	15,3%	COREP CA 1
Memorandum items			
Amount of holdings, participations and subordinated claims in credit, financial and insurance institutions not deducted for the computation of core tier 1 but deducted for the computation of total own funds	-867	-0,3%	Total of items as defined by Article 57 (l), (m), (n) (o) and (p) of Directive 2006/48/EC not deducted for the computation of original own funds
Amount of securitisation exposures not included in RWA and not deducted for the computation of core tier 1 but deducted for the computation of total own funds			Total of items as defined by Article 57 (r) of Directive 2006/48/EC not deducted for the computation of original own funds
Deferred tax assets (2)	1.183	0,4%	As referred to in paragraph 69 of BCBS publication dated December 2010 : "Basel 3 – a global regulatory framework for more resilient banks and banking systems"
Minority interests (excluding hybrid instruments) (2)	748	0,2%	Gross amount of minority interests as defined by Article 65 1. (a) of Directive 2006/48/EC
Valuation differences eligible as original own funds (-/+) (3)			COREP line 1.1.2.6

Notes and definitions

(1) The amount is already included in the computation of the eligible capital and reserves and it is provided separately for information purposes.

(2) According to the Basel 3 framework specific rules apply for the treatment of these items under the Basel 3 framework, no full deduction is required for the computation of common equity.

(3) This item represents the impact in original own funds of valuation differences arising from the application of fair value measurement to certain financial instruments (AFS/FVO) and property assets after the application of prudential filters.

Results of the 2011 EBA EU-wide stress test: Overview of mitigating measures [1-2]

Name of the bank: ING Bank N.V.

Use of countercyclical provisions, divestments and other management actions

Please fill in the table using a separate row for each measure	**Narrative description**	**Date of completion** (actual or planned for future issuances)	**Capital / P&L impact** (as of 31 December 2012, in million EUR)	**RWA impact** (in million EUR)	**Capital ratio impact** (as of 31 December 2012) %
A) Use of provisions and/or other reserves (including release of countercyclical provisions), [3]					
B) Divestments and other management actions taken by 30 April 2011					
1)					
2)					
C) Other disinvestments and restructuring measures, including also future mandatory restructuring not yet approved with the EU Commission under the EU State Aid rules					
1) Repayment to the Dutch State	Repayment of EUR 2 billion + 1 billion premium (executed in May 2011)	2Q2011	-3.000		-0,8%
2) Divestments	Announced and committed divestment of Real Estate Investment Management, ING Direct US, ING Car Lease	4Q2011	85	-30.093	0,7%

Future capital raisings and other back stop measures

Please fill in the table using a separate row for each measure	**Date of issuance** (actual or planned for future issuances, dd/mm/yy)	**Amount**	**Maturity**	**Loss absorbency in going concern**	**Flexibility of payments (capacity to**	**Permanence (Undated and without incentive to redeem)**	**Conversion clause (where appropriate)**			
							Nature of conversion	**Date of conversion**	**Triggers**	**Conversion in common equity**
		(in million EUR)	(dated/ undated) [4]	(Yes/No)	(Yes/No)	(Yes/No)	(mandatory/ discretionary)	(at any time/from a specific date: dd/mm/yy)	(description of the triggers)	(Yes/No)
D) Future planned issuances of common equity instruments (private issuances)										
E) Future planned government subscriptions of capital instruments (including hybrids)										
1) Denomination of the instrument										
2)										
F) Other (existing and future) instruments recognised as back stop measures by national supervisory authorities (including hybrids)										
1) Denomination of the instrument										
2)										

Notes and definitions

(1) The order of the measures follows the order of mitigating measures reported in the Section D of the worksheet "1 - Aggregate information".
(2) All elements are be reported net of tax effects.

(3) If under the national legislation, the release of countercyclical provisions and/or other similar reserves is allowed, this figure for 2010 could be included either in rows "Impairments on financial assets in the banking book" or "Other income" for 2010, whereas under the EU-wide stress test methodology such release for 2011-2012 should be reported in Section D of the worksheet "1- Aggregate information" as other mitigating measures and explained in this worksheet.
(4) If dated please insert the maturity date (dd/mm/yy) otherwise specify undated.

Results of the 2011 EBA EU-wide stress test: Credit risk exposures (EAD - exposure at default), as of 31 December 2010, mln EUR, (1-5)

Name of the bank: ING Bank N.V.

All values in million EUR, or %

	Non-defaulted exposures											
	Institutions	Corporate (excluding commercial real estate)	Retail (excluding commercial real estate)	of which Residential mortgages	*Loan to Value (LTV) ratio (%).* (6)	of which Revolving	of which SME	of which other	Commercial Real Estate	*Loan to Value (LTV) ratio (%)* (6)	Defaulted exposures (excluding sovereign)	Total exposures (7)
Austria												
Belgium	4.933	29.162	34.394	25.200	*60*		5.923	3.271	630	*59*	1.751	**81.272**
Bulgaria												
Cyprus												
Czech Republic												
Denmark												
Estonia												
Finland												
France												
Germany	16.459	13.209	57.917	53.181	*73*		40	4.697	890	*64*	1.165	**101.573**
Greece												
Hungary												
Iceland												
Ireland												
Italy												
Latvia												
Liechtenstein												
Lithuania												
Luxembourg												
Malta												
Netherlands	1.096	53.982	159.502	142.007	*80*		9.737	7.759	17.913	*72*	5.177	**262.887**
Norway												
Poland												
Portugal												
Romania												
Slovakia												
Slovenia												
Spain												
Sweden												
United Kingdom												
United States	8.605	27.472	28.784	28.454	*75*		59	271	4.460	*80*	2.381	**73.803**
Japan												
Other non EEA non Emerging countries	16.726	23.165	53.800	53.205	*69*		39	556	2.521	*92*	729	**102.917**
Asia	8.144	9.810	1.490	807	*70*		535	148	0	*77*	284	**22.718**
Middle and South America	1.218	3.518	10	7	*106*		1	2	1	*54*	165	**4.994**
Eastern Europe non EEA	2.703	9.586	4.743	1.064	*75*		1.765	1.915	120	*72*	117	**19.639**
Others	51.873	70.678	29.247	20.779	*57*		5.849	2.618	10.470	*78*	3.593	**237.641**
Total	111.756	240.582	369.887	324.704	*84*	0	23.947	21.236	37.005	*72*	15.364	**907.444**

Notes and definitions

(1) EAD - Exposure at Default or exposure value in the meaning of the CRD.

(2) The EAD reported here are based on the methodologies and portfolio breakdowns used in the 2011 EU-wide stress test, and hence may differ from the EAD reported by banks in their Pillar 3 disclosures, which can vary based on national regulation. For example, this would affect breakdown of EAD for real estate exposures and SME exposures.

(3) Breakdown by country and macro area (e.g. Asia) when EAD >=5%. In any case coverage 100% of total EAD should be ensured (if exact mapping of some exposures to geographies is not possible, they should be allocated to the group "others").

(4) The allocation of countries and exposures to macro areas and emerging/non-emerging is according to the IMF WEO country groupings. See: http://www.imf.org/external/pubs/ft/weo/2010/01/weodata/groups.htm

(5) Residential real estate property which is or will be occupied or let by the owner, or the beneficial owner in the case of personal investment companies, and commercial real estate property, that is, offices and other commercial premises, which are recognised as eligible collateral in the meaning of the CRD, with the following criteria, which need to be met:
(a) the value of the property does not materially depend upon the credit quality of the obligor. This requirement does not preclude situations where purely macro economic factors affect both the value of the property and the performance of the borrower; and
(b) the risk of the borrower does not materially depend upon the performance of the underlying property or project, but rather on the underlying capacity of the borrower to repay the debt from other sources. As such, repayment of the facility does not materially depend on any cash flow generated by the underlying property serving as collateral.

(6) Loan to value ratio - ratio of EAD to the market value of real estate used as collateral for such exposures. Given the different methodologies applied to assessing the value, the bank is required to explain the computation of the ratio. In particular (a) whether collateral values is marked-to-market or any other valuation method is used, (b) whether the amount has been adjusted for principal repayments, and (c) how guarantees other than the underlying property are treated.

Definition of Loan to Value ratio used:
ING: For residential mortgages the LTV is calculated as the ratio between EAD and property value; for commercial real estate the LTV is calculated as the ratio between outstandings and property value. The property value for commercial real estate is always based on market evaluations.
The property value can either indexed (US, Spain, Italy, Canada), or based on market evaluations (Germany and Australia). Property values in the Netherlands are based on execution values and are indexed.
Principal payments that occured until reporting date have been taken into account. Any form of guarantee is excluded from the calculation of LTV for Commercial real Estate'

(7) Total exposures is the total EAD according to the CRD definition based on which the bank computes RWA for credit risk. Total exposures, in addition to the exposures broken down by regulatory portfolios in this table, include EAD for securitisation transactions, counterparty credit risk, sovereigns, guaranteed by sovereigns, public sector entities and central banks.

Results of the 2011 EBA EU-wide stress test: Exposures to sovereigns (central and local governments), as of 31 December 2010, mln EUR [1,2]

Name of the bank: ING Bank N.V.

All values in million EUR

Residual Maturity	Country/Region	GROSS DIRECT LONG EXPOSURES (accounting value gross of specific provisions)		NET DIRECT POSITIONS (gross exposures (long) net of cash short position of sovereign debt to other counterparties only where there is maturity matching)				DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES	INDIRECT SOVEREIGN EXPOSURES IN THE TRADING BOOK
			of which: loans and advances		of which: AFS banking book	of which: FVO (designated at fair value through profit&loss) banking book	of which: Trading book [3]	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)
3M	Austria	101		101	99		2		
1Y	Austria	0	0	0					
2Y	Austria	2		2			2		
3Y	Austria	10		9			9		0
5Y	Austria	11		1			1		
10Y	Austria	815		786	786		0		
15Y	Austria	24		0			0		
		963	0	899	885	0	14	0	0
3M	Belgium	102	0	28	28		0		
1Y	Belgium	1.527	712	1.508	796		0		
2Y	Belgium	2.153	3	2.125	2.122		0	-86	
3Y	Belgium	1.376	2	1.360	1.320		38	0	0
5Y	Belgium	1.655	5	1.610	1.521		83	4	
10Y	Belgium	2.161	1	2.076	2.033		42	13	
15Y	Belgium	167	20	100	80		0	68	
		9.140	743	8.807	7.901	0	164	-1	0
3M	Bulgaria			0					
1Y	Bulgaria	10		10			10		
2Y	Bulgaria	13		13			13		
3Y	Bulgaria			0					0
5Y	Bulgaria	0		0			0		1
10Y	Bulgaria	2		2			2		0
15Y	Bulgaria			0					
		25	0	25	0	0	25	0	1
3M	Cyprus			0					
1Y	Cyprus	2		2			2		
2Y	Cyprus			0					
3Y	Cyprus	0		0			0		
5Y	Cyprus	24		24	24		0		
10Y	Cyprus	0		0			0		
15Y	Cyprus			0					
		26	0	26	24	0	3	0	0
3M	Czech Republic	0		0			0		
1Y	Czech Republic			0					
2Y	Czech Republic	0		0			0		
3Y	Czech Republic	2		2			2		1
5Y	Czech Republic	2		2	2		0		0
10Y	Czech Republic	511		511	511		0		
15Y	Czech Republic	0		0			0		
		515	0	515	513	0	2	0	1
3M	Denmark			0					
1Y	Denmark			0			0		
2Y	Denmark			0					
3Y	Denmark	7		7			7		0
5Y	Denmark	2		0			0		
10Y	Denmark			0					
15Y	Denmark			0					
		9	0	7	0	0	7	0	0
3M	Estonia			0					
1Y	Estonia			0					
2Y	Estonia			0					1
3Y	Estonia			0					-1
5Y	Estonia			0					
10Y	Estonia			0					
15Y	Estonia			0					
		0	0	0	0	0	0	0	0
3M	Finland	1		1			1		
1Y	Finland			0					
2Y	Finland	1		1			1		
3Y	Finland	33		28	1		27		

Residual Maturity	Country/Region	GROSS DIRECT LONG EXPOSURES (accounting value gross of specific provisions)		NET DIRECT POSITIONS (gross exposures (long) net of cash short position of sovereign debt to other counterparties only where there is maturity matching)				DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES	INDIRECT SOVEREIGN EXPOSURES IN THE TRADING BOOK
			of which: loans and advances		of which: AFS banking book	of which: FVO (designated at fair value through profit&loss) banking book	of which: Trading book [3]	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)
5Y	Finland	30		18			18		
10Y		22		1			1		
15Y		14		11			11		
		99	0	59	1	0	59	0	0
3M	France	1.575	0	1.563	1.496		67		
1Y		44	1	17	16		0		
2Y		2.042	0	2.040	2.040		0		
3Y		85	0	0	0		0		
5Y		1.599	0	1.588	1.473		115		
10Y		2.455	9	2.250	2.152		89		3
15Y		1.116		1.037	1.037		0		
		8.915	10	8.494	8.213	0	271	0	3
3M	Germany	2.406	2.319	2.395			76		
1Y		1.581	101	1.061	4		956		
2Y		70	1	1			0		-419
3Y		1.777	1	1.531	1.357		172		
5Y		2.330	0	2.210	2.081		0		-180
10Y		4.849	2.756	4.715	1.707		0		201
15Y		2.662		2.255	1.544		494	-97	7
		15.675	5.179	14.167	6.694	0	1.698	-97	-390
3M	Greece	0		0			0		
1Y		0		0			0		
2Y		11		11	11		0		
3Y		12		12	10		1		
5Y		40		39	36		3		2
10Y		441		441	683		0	15	
15Y		242		242	0		0		
		746	0	745	740	0	5	15	2
3M	Hungary	175		175			175		
1Y		29		24			24		0
2Y		4		3			3		0
3Y		125		125			0		1
5Y		9	0	7	6		1		-2
10Y		1	0	0			0		0
15Y				0				2	
		342	0	333	6	0	203	2	-1
3M	Iceland			0					
1Y				0					
2Y				0					
3Y				0					
5Y				0					
10Y		30		30	30				
15Y				0					
		30	0	30	30	0	0	0	0
3M	Ireland	88		88			88		
1Y		0		0			0		
2Y		0		0			0		
3Y		0		0			0		0
5Y		1	0	1			1		
10Y		3		1			1	8	
15Y		0		0			0		
		92	0	90	0	0	90	8	0
3M	Italy	58	18	18			0		
1Y		119	41	90	50		0		0
2Y		2.072	12	864	852		0		-20
3Y		1.543	33	1.477	649		795		-1
5Y		629	140	568	363		65		
10Y		2.365	27	1.930	1.904		0	-8	-31
15Y		878	12	753	537		203		
		7.663	283	5.702	4.355	0	1.064	-8	-52
3M	Latvia			0					
1Y				0					
2Y				0					
3Y		0		0			0		
5Y				0					
10Y		0		0			0		

Residual Maturity	Country/Region	GROSS DIRECT LONG EXPOSURES (accounting value gross of specific provisions)		NET DIRECT POSITIONS (gross exposures (long) net of cash short position of sovereign debt to other counterparties only where there is maturity matching)				DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES	INDIRECT SOVEREIGN EXPOSURES IN THE TRADING BOOK
			of which: loans and advances		of which: AFS banking book	of which: FVO (designated at fair value through profit&loss) banking book	of which: Trading book (3)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)
15Y				0					
		0	0	0	0	0	0	0	0
3M				0					
1Y				0					
2Y				0					
3Y	Liechtenstein			0					
5Y				0					
10Y				0					
15Y				0					
		0	0	0	0	0	0	0	0
3M				0					
1Y		0		0			0		
2Y		3		3	3		0		
3Y	Lithuania	3		3	3		0		0
5Y		4		3			3		
10Y		1		1			1		
15Y				0					
		12	0	11	6	0	4	0	0
3M		0	0	0					
1Y		198	198	198					
2Y		0	0	0					
3Y	Luxembourg	1	1	1					
5Y		2	2	2					
10Y		0	0	0			0		
15Y				0					
		202	202	202	0	0	0	0	0
3M				0					
1Y				0					
2Y				0					
3Y	Malta			0					
5Y				0					
10Y				0					
15Y				0					
		0	0	0	0	0	0	0	0
3M		167	16	104			89		0
1Y		718	114	718	302		0		0
2Y		4.766	9	4.757	1.134		3.614		0
3Y	Netherlands	1.330	9	1.308	1.298		0		3
5Y		1.028	17	865	676		172		-8
10Y		2.827	65	2.716	2.153		285	3	1
15Y		11.374	11.360	11.359			0	-29	
		22.210	11.590	21.828	5.564	0	4.160	-26	-4
3M				0					
1Y				0					
2Y				0					
3Y	Norway			0					
5Y				0					
10Y				0					
15Y				0					
		0	0	0	0	0	0	0	0
3M		4.115	6	4.104	4.067		31		
1Y		81	9	42	1		33		
2Y		160	26	157	131		0		0
3Y	Poland	93	64	79	16		0		0
5Y		278	223	253	26		4		0
10Y		967	873	934	62		0		
15Y		316	278	311	20		13		
		6.010	1.477	5.881	4.323	0	81	0	1
3M		0		0			0		
1Y		87		40			40		
2Y				0					
3Y	Portugal	5		0			0		0
5Y		377		375	375		0		
10Y		289		277	276		1		
15Y		0		0			0		
		759	0	693	651	0	42	0	0

Residual Maturity	Country/Region	GROSS DIRECT LONG EXPOSURES (accounting value gross of specific provisions)		NET DIRECT POSITIONS (gross exposures (long) net of cash short position of sovereign debt to other counterparties only where there is maturity matching)				DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES	INDIRECT SOVEREIGN EXPOSURES IN THE TRADING BOOK
			of which: loans and advances		of which: AFS banking book	of which: FVO (designated at fair value through profit&loss) banking book	of which: Trading book (3)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)
3M	Romania	187		187			187		0
1Y		72	2	72			70		0
2Y		1		1			1		
3Y		3	0	3			3		1
5Y		4		4			4		0
10Y		1		1			1		
15Y				0					
		268	2	268	0	0	266	0	1
3M	Slovakia	58		58			58		
1Y		89		89			89		
2Y		1		1			1		
3Y		9		9			9		0
5Y		21		21	15		5		2
10Y		6		6			6		-3
15Y		11		11			11		
		194	0	194	15	0	178	0	-2
3M	Slovenia	0		0			0		
1Y		11		11	11		0		
2Y				0					
3Y		19		19			19		
5Y		1		0			0		0
10Y		83		70			70		
15Y				0			0		
		114	0	100	11	0	89	0	0
3M	Spain	22	22	22			0		
1Y		297	6	297	289		3		-1
2Y		135	8	133	125		0		0
3Y		283	15	282	267		0		0
5Y		98	23	59	33		3		
10Y		409	35	406	192		0		-7
15Y		702		560	552		7		
		1.945	107	1.758	1.458	0	13	0	-8
3M	Sweden			0					
1Y		4		4			4		
2Y				0					
3Y		1		1			1		0
5Y				0					
10Y				0					
15Y				0					
		5	0	5	0	0	5	0	0
3M	United Kingdom	10	10	10					
1Y		31	31	31					
2Y		62	62	62					
3Y		101	101	101					0
5Y		65	65	65					
10Y		3	3	3					0
15Y		4	4	4					
		276	276	276	0	0	0	0	0
	TOTAL EEA 30	**76.235**	**19.868**	**71.114**	**41.390**	**0**	**8.441**	**-108**	**-448**
3M	United States	4		4			4		
1Y		2	2	2					
2Y				0			0		
3Y				0			0		
5Y		742		740	740		0		118
10Y		738		698	698		0		0
15Y		5		0			0		-12
		1.491	2	1.444	1.438	0	4	0	106
3M	Japan	184		184	184				
1Y				0					0
2Y				0					0
3Y				0					
5Y				0					
10Y				0					
15Y				0					

Residual Maturity	Country/Region	GROSS DIRECT LONG EXPOSURES (accounting value gross of specific provisions)		NET DIRECT POSITIONS (gross exposures (long) net of cash short position of sovereign debt to other counterparties only where there is maturity matching)				DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES	INDIRECT SOVEREIGN EXPOSURES IN THE TRADING BOOK
			of which: loans and advances		of which: AFS banking book	of which: FVO (designated at fair value through profit&loss) banking book	of which: Trading book [3]	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)
		184	0	184	184	0	0	0	0
3M	Other non EEA non Emerging countries	147	8	147	138		2		
1Y		197	1	197	132		0		0
2Y		120		120	118		2		0
3Y		183		179	179		0		0
5Y		1.715		1.715	1.714		1		
10Y		1.724	20	1.723	1.632		0		138
15Y				0					
		4.086	29	4.082	3.913	0	5	0	138
3M	Asia	1.382		1.382			1.382		-242
1Y		381		381			381		1
2Y		267		264			264		-590
3Y		251		249			249		-112
5Y		231		210			210		-1
10Y		90		85			85		0
15Y		38		30			30		0
		2.640	0	2.601	0	0	2.601	0	-944
3M	Middle and South America	320		0			0		-430
1Y		627		0			0		1
2Y		1.123		311			311		-1
3Y		1.635		1.300			1.300		-4
5Y		910		0			0		1
10Y		2.194		242			242		-345
15Y		1.790		141			141		-265
		8.598	0	1.994	0	0	1.994	0	-1.042
3M	Eastern Europe non EEA	137		136			136		0
1Y		118		118			118		0
2Y		92		92			92		0
3Y		28		28			28		-1
5Y		31		16			16		0
10Y		6		4			4		-2
15Y		0		0			0		
		413	0	394	0	0	394	0	-3
3M	Others	559	1	559	558				0
1Y		262	10	261	251				0
2Y		261	133	261	119		0		
3Y		235	118	234	100		1		-1
5Y		731	60	730	665		5		0
10Y		1.247	515	1.246	729		2		
15Y		938	684	935	241		10		
		4.233	1.520	4.227	2.664	0	18	0	-1
	TOTAL	**97.880**	**21.420**	**86.039**	**49.588**	**0**	**13.457**	**-108**	**-2.194**

Notes and definitions

(1) The allocation of countries and exposures to macro areas and emerging/non-emerging is according to the IMF WEO country groupings. See: http://www.imf.org/external/pubs/ft/weo/2010/01/weodata/groups.htm

(2) The exposures reported in this worksheet cover only exposures to central and local governments on immediate borrower basis, and do not include exposures to other counterparts with full or partial government guarantees (such exposures are however included in the total EAD reported in the worksheet "4 - EADs").

(3) According to the EBA methodologies, for the trading book assets banks have been allowed to offset only cash short positions having the same maturities (paragraph 202 of the Methodological note).