

UN Global Compact Advanced Level Criteria report ASN Bank 2011

Global Compact

The Global Compact is an initiative of the United Nations that encourages companies to include and abide by ten principles in the areas of human rights, employment, the environment and corruption. As Ewoud Goudswaard, our Managing Director, puts it, 'In 2007 ASN Bank signed the Global Compact to express its long-standing involvement with the ten goals of this international UN initiative. This report shows how we implemented it in 2010.'

Appendix 2 contains a list of the pages of this annual report and elsewhere where we issue reports according to the ten principles of the Global Compact.

From Page 21 of our Annual Report

ASN  BANK
FOR THE WORLD OF TOMORROW

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Introduction:

Doing sustainable business is the core business of ASN Bank. Being a sustainable Bank means banking and investing in a sustainable manner, but also being transparent about our sustainable performance. ASN Bank signed the Global Compact in 2007 and has been reporting since on the 10 principles in our Annual Report.¹ The UN Global principles on human rights, employment, the environment and corruption are very much in line with our sustainable mission and practices. In 2010 UN Global Compact published the series Embedding Human Rights in Business Practice in which it referred to ASN Bank's human rights policy as an example of what a bank can do to observe human rights.²

This report marks the first time that ASN Bank reports on the Advanced level criteria, yet most of the information below is based on the Annual Report 2010 of the bank. In Appendix 2 of our current Annual Report an overview can be found of the pages of the annual report and other relevant sources in which we report according to the ten principles of the Global Compact. Some of the information is based on our Issue papers or other policy papers or practices; all the information is publicly available on our website (www.asnbank.nl).³

In the below report you will find information on how ASN bank performs on the Advanced Level Criteria. This is structured according to the Advanced level criteria and the 'suggested best practices' indicators, which can be found in the document drafted by UN Global Compact see:

http://www.unglobalcompact.org/COP/differentiation/GCAdvanced_level.html

Each time we first mention the specific criterion and then explain how we implement this.

This communication on progress includes:⁴

- *Primary sources:*
 - The present Report on the Advanced Level Criteria
 - The Annual Report of the Bank
- *Other sources:*
 - Annual reports of the investment funds
 - Our Issue Papers
 - Our Website

¹ Our Annual Report is published on our website: www.asnbank.nl.

² *Embedding Human Rights in Practice III*, UN Global Compact, 2009. The case study can also be found here: <http://www.unglobalcompact.org/participant/823-ASN-Bank>

³ Please note, as we are a Dutch bank only active in the Dutch retail market we communicate mostly in Dutch, some of our reports and policies are available in English, such as our Annual Report and our Issue Papers (policy papers) on Human Rights, Biodiversity and Climate Change. The Annual Report of the Bank will soon be available in English on our website.

⁴ Ibid.

Strategy, Governance and engagement

- **Criterion 1: C-suite and Board level discussions of strategic aspects of Global Compact implementation**
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In the centre of sustainable society⁵

2010 was a year to revisit our sustainability successes of the past fifty years, but also a year that saw the emergence of new obstacles on the way towards a sustainable society. The new government seems to place less emphasis on sustainability. Our experience, however, is that business owners and private individuals are increasingly taking sustainable initiatives. In 2010, we met many enthusiastic people who are committed to sustainability, including a growing number of business owners.

Looking ahead with our customers⁶

ASN Bank strives for transparency. This means that we are clear about our policy, but also - in our view - that we include our customers' wishes in our policy determination. In the run-up to our jubilee, we conducted two large surveys. We investigated what customers expect of the 'bank of the future' and we asked ASN customers about their wishes and expectations as regards our sustainability policy.

Bank of the future⁷

We conducted the 'bank of the future' survey among Dutch consumers and ASN customers, a general survey about banks, and what the ideal bank should look like. The way they see banks, as they are now, turned out to be far from positive. Although people are happy with easy-to-use online payment facilities, they are dissatisfied with high bonuses, lack of personal contact, large offices, obscure investment policies, complicated products and pursuit of short-term profit. In the future, Dutch consumers want banks:

- To be reliable, safe and service-driven, and to focus on customer interests rather than the bank's interests;
- To offer safe and easy-to-understand products, without small print. Online banking is also a major responsibility of banks, now and in the future;
- To handle customers' money in a sustainable and responsible manner. This means that banks may not take any risks with this money and may not finance any activities that harm society and the world. Especially the latter aspect is important to very important to almost two-thirds of the consumers. In addition, they believe that the bank of the future should finance initiatives that contribute to society or the world.

These results confirm that ASN Bank is on the right track. In the past fifty years, we have laid the foundations on which we can expand our position as a sustainable bank.

2011: continuing to work towards a sustainable future⁸

Because our customer place your trust in us, we have been able to work towards a sustainable world for fifty years now. We are transparent about our activities in order to be worthy of that trust. We also want our sustainability policy and our services to be in line with their wishes. In 2011, we will achieve this in the following ways:

- We will include the four sustainability issues in our services and our policy. ASN Bank Issue Papers will be published on each issue in 2011. We will also concentrate on companies and projects that tackle one or more of those issues. The issue of renewable energy, for example, is reflected in our focus on financing wind and solar power. In the ASN investment funds, we want to focus on companies that are committed to fighting child labour and promoting fair trade.

⁵ Annual report page 29.

⁶ Annual report page 28

⁷ Ibid.

⁸ Annual report page 31.

We will also underline one of the four sustainability issues every year in our sponsorship of activities and the donations made by ASN Foundation.

- We will enhance our services with a current account for young people aged 12 to 24, the *ASN Jongerenrekening*.
- We will change the organisation of our sustainability research. Carrying out this research ourselves will enable us to respond more quickly to current developments and to translate our insights into investment policy.
- If our customer base grows, we have more funds to invest in a sustainable future. Practice has shown that we have certainly not yet reached everybody interested in sustainable banking. That is why we are aiming to expand our brand recognition in 2011, using television advertising for the first time ever.

As the bank is growing and sustainability is such a core function we will also expand our Sustainability department in 2011. On top of its role as policy advisor (of the bank and management board) in the area of sustainability the team will also take up the ESG-research of all our investments which was until now done externally. The team will expand from two to six team members.

Summary of social and environmental performance⁹

Indirect social and environmental performance

The sustainability performance objectives of ASN Bank as an organisation are derived from its mission, which is: 'ASN Bank is a company committed to promoting the sustainability of society and is guided by that commitment in its commercial conduct.' We measure these objectives on three levels: quantity, quality and long-term, because we wish to contribute to a sustainable society on all these levels.

Accordingly, we have formulated objectives on each of these three levels. We express our quantitative goals in figures and our qualitative goals in 'achieved or not achieved'. As part of our long-term goals, we aim to initiate processes that promote sustainability. We can translate these goals into quantitative and qualitative terms.

Quantitative goals

In 2010 we achieved all of our quantitative objectives for indirect social and environmental performance. ASN Bank's customer focus is reflected by the high customer satisfaction rating it received (8 out of 10). We take every effort to involve our customers in our bank and in the development of our sustainability policy (see Chapter 5). In turn, our customers are extremely loyal to ASN Bank. This means that our situation is completely different from that experienced by many major banks, which have lost some of the public's confidence since the credit crisis.

In 2010 we exercised our voting rights at more than 98% of the shareholders' meetings of companies included in ASN Aandelenfonds and ASN Mixfonds, compared to 73% in 2009. That is well above our target of 90%. We voted at every shareholders' meeting of the companies included in ASN Milieu & Waterfonds and ASN Small & Midcap Fonds. That was likewise well above target, which was 50%. This strong increase was the result of improved procedures and electronic exercise of our voting rights. In the few cases in which we did not vote, we held non-voting shares. 92% of the bank's debtors were rescreened (see Appendix 3). That is also above our 90% target.

We exceeded our target for the consolidated CO2 impact (carbon footprint) of our equity investment funds, thereby reducing these funds' greenhouse gas emissions for the third year in a row.

⁹ From our Annual Report 2010, pages 8, 9 & 30.

	<i>Target for 2010</i>	<i>Achieved in 2010</i>	<i>Target for 2011</i>
Customer satisfaction	8	8	8
Exercise of voting rights for ASN Aandelenfonds and ASN Mixfonds	90%	98%	90%
Exercise of voting rights for ASN Milieu & Waterfonds and ASN Small & Midcap Fonds	50%	100%	90%
Three-yearly sustainability re-screening of the bank's debtors at sector level	90%	92%	90%
Consolidated carbon footprint of ASN equity funds	less than or equal to 261* (2009)	250*	see long-term target

*tonnes per million euros (according to the Trucost method; see page 34)

Qualitative goals

Our qualitative goals are aimed at developing our sustainability policy.

<i>Target for 2010</i>	<i>Achieved in 2010</i>	<i>Target for 2011</i>
Human rights: measuring the performance of ASN Aandelenfonds	Results available, to be published in 2011	Reformulating human rights policy in the Human Rights Issue Paper
Climate: creating internal ASN Aandelenfonds benchmark for climate	Done	Reformulating climate change policy in the Climate Change Issue Paper
Issue Papers: new Biodiversity and Healthcare issue papers	Ready and published on the website	Issue Papers on the sustainability issues trade, renewable energy, child labour and arms industry
Organising sustainability research	-	Setting up sustainability research at ASN Bank

Long-term goals

Apart from our quantitative and qualitative goals, we have a major, broadly worded long-term goal: as a sustainable bank, ASN Bank wants to make a clear, active contribution each year to promoting the long-term sustainability of society. ASN Bank has now included a quantitative long-term goal for the first time. This goal has been set, but the methods we will use to monitor progress have not yet been determined. Together with independent experts, we will develop sound methods in 2011 to carefully measure that progress. We have formulated specific targets for the following subject.

	<i>2015</i>	<i>2020</i>
Reduction of consolidated carbon footprint of the ASN equity funds compared to 1990	30%	50%

Direct social and environmental performance

Looking at our direct social and environmental performance (included below), we note that we achieved all three objectives. You will find more information about our environmental and social results in Chapters 5 to 8 and in the Appendices of our annual report.

	<i>Target for 2010</i>	<i>Achieved in 2010</i>	<i>Target for 2011</i>
CO ₂ emissions per FTE (tonnes per annum)	less than or equal to 2.17 (2006)	achieved: 1.75	less than or equal to 2.17 (2006)
Paper consumption (kg/client account)	less than or equal to 0.36 (2008)	achieved: 0.36	less than or equal to 0.35 (2009)
Employee satisfaction	more than or equal to 8.0	achieved: 8.6	more than or equal to 8.0
New office accommodations	-	-	Energy rating 'A' and 'Green Certificate'

Recognition of our efforts

It was striking that the awards and honourable mentions we received in 2010 largely dovetailed with our customers' demand for transparency, simplicity and personal banking services.

- The Dutch Consumers' Association ranked us first in the 'Bank Monitor', which reflects consumer satisfaction with their banks' online banking offering, services and costs. Our final average score was 7.9 out of 10.
- The Fair Bank Guide gave ASN Bank the green light. This site shows how banks perform in areas such as climate change, human rights, nature and animal welfare, and how they deal with these issues in various economic sectors. Out of eighteen ratings, we received fourteen 'good' ratings and four 'adequate' ratings.
- According to the financial comparison site Independer.nl, ASN Bank offered the best price-quality ratio and fast service.
- According to Market response, a research agency, ASN Bank was the most customer-friendly bank in the Netherlands. This conclusion was based on a survey conducted among 2500 consumers.
- ASN Bank ranked among the top three in the battle for the title of most sustainable brand in the Netherlands.
- ASN Bank won the Gouden Stier ('Golden Bull') award as best fund manager of the year. This award was presented by belegger.nl, an independent financial site for investors. The panel particularly praised our transparency and the clarity of our range of investment funds.
- The audience of belegger.nl rewarded ASN Milieu & Waterfonds – for the fourth time in a row – with a Groene Stier ('Green Bull') award for the best sustainable investment product.
- Our two Managing Directors were mentioned in the 'sustainable 100' of newspaper Trouw, in which Jeroen Jansen ranked 23, up from 46.
- ASN Bank won the 2010 Financial Marketing Award, together with De Hypotheekshop. According to the panel, ASN Bank contributed to restoring confidence in the financial sector. It provided a blueprint of the bank of the future: a bank posting good results that is truly there for its customers. ASN Bank has grown into a modern, fresh online bank that really involves its customers, according to the panel.
- We will change the organisation of our sustainability research. Carrying out this research ourselves will enable us to respond more quickly to current developments and to translate our insights into investment policy.
- If our customer base grows, we have more funds to invest in a sustainable future. Practice has shown that we have certainly not yet reached everybody interested in sustainable banking. That is why we are aiming to expand our brand recognition in 2011, using television advertising for the first time ever.

Sustainable Dilemma's¹⁰

ASN Bank regularly faces dilemmas in its sustainability policy, because the choice for sustainability or ethics is not always an unequivocal one. Do we invest in a wind turbine manufacturer without a human rights policy? How do we act if a company is accused of corruption that is not proven? By formulating our sustainability policy as clearly as possible, we attempt to obviate such dilemmas. For example, we lay down in the policy that we do not invest in nuclear energy on account of the safety hazards and the resulting waste. Accordingly, we assign more weight to safety and the waste problem than to the contribution that nuclear energy can make towards reducing the greenhouse effect. That is a clear choice in this dilemma. However, policy can never solve all dilemmas. If a specific dilemma so requires, we will look for an answer that is in line with our mission and our customers' wishes. We do so on the basis of our own research, consulting our stakeholders as well as specialists.

Please find a couple of examples below:

Sustainable dilemma: including the CO₂ emissions of paper?

Each office has three major sources of CO₂ emissions: electricity, heating and transport. However, paper is also a major environmental indicator. Should we therefore calculate the CO₂ impact for which our paper consumption is responsible? This will raise questions to which we do not yet have the answer. For example: is the carbon footprint of paper consumption more important than the impact of the production of our lease cars or the office building? Are there any clear standards for calculating the CO₂ impact of paper consumption? There are several methods to calculate the CO₂ impact of paper. The question is which one would be the best to use. Moreover, these methods only apply to paper type FSC mixed sources, whereas we mostly use 100% recycled paper. We will solve this dilemma in 2011.

Sustainable dilemma: how far does supply chain responsibility go?

Corporate responsibility extends increasingly further into its supply chain, for example in countries in which governments care very little about human rights. But how far does supply chain responsibility go? Are companies responsible for the energy consumption of consumers who use their products? We believe that companies have a great, but not an unlimited, responsibility. We now place the limit at the 'scope of influence' that companies have, but is that fair? Does a company's responsibility stop where it can no longer exert any influence? We will discuss this issue again during our review of the ASN Bank Human Rights Issue Paper in 2011.

Sustainable dilemma: yes or no to investment in roads?

In 2010, we published the ASN Bank Transport and Mobility Issue Paper as a guide to investing in this sector. One of the dilemmas identified in this Issue Paper was: should ASN Bank invest in roads, or not? The use, construction and maintenance of roads place a great burden on the environment and the health of local residents. However, roads are also needed in a sustainable society where only electric cars are used. In addition, poorer countries cannot develop well without roads. Where do we draw the line? Not investing in roads does not fit in well with our vision of a sustainable society, but making such investments could conflict with other interests. We have decided to allow investment in roads under certain conditions. For example, in rich countries we invest in the maintenance of existing roads, but not in the construction of new roads. In developing countries we invest both in new roads and in maintenance, provided the relevant project meets the conditions laid down in the ASN Bank Biodiversity Issue Paper.

¹⁰ From Page 38 of Our Annual Report.

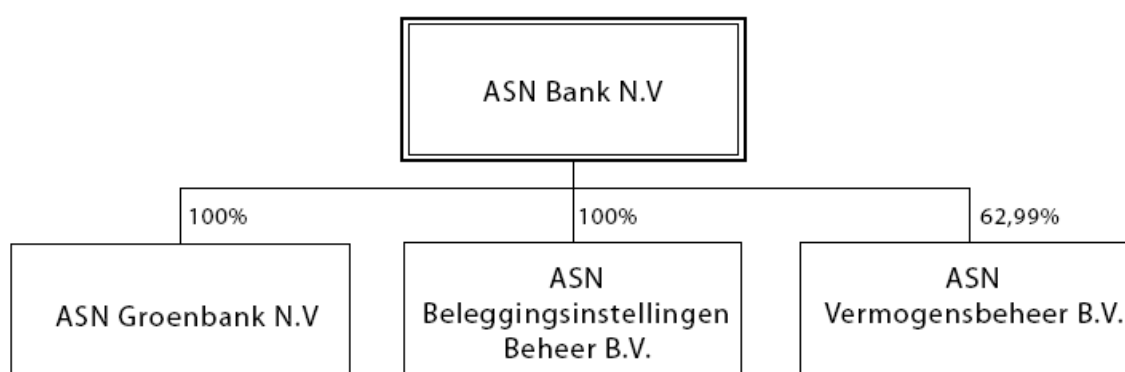
Criterion 2: The COP describes effective decision-making processes and systems of governance for corporate sustainability

Corporate Governance¹¹

ASN Bank N.V. (ASN Bank) is an independent subsidiary of SNS REAAL N.V. All ASN Bank shares are held by SNS Bank N.V. ASN Groenbank N.V. is a wholly-owned subsidiary of ASN Bank, established to attract 'green' savings deposits with tax benefits from private individuals and to offer 'green' sustainable loans.

ASN Beleggingsinstellingen Beheer B.V. is the fund manager of the investments funds offered by ASN Bank. ASN Vermogensbeheer N.V. is a subsidiary of ASN Bank N.V., which holds 62.99% of the shares. ASN Vermogensbeheer N.V. provides asset management services to ASN Bank customers.

Capital Structure



Corporate governance

ASN Bank's governance (its management) focuses on the optimum deployment of our operational processes for the benefit of our customers. This is done in collaboration with several supporting SNS REAAL business units.

Governance highlights

ASN Bank has a Management Board and a Supervisory Board carrying all powers assigned to supervisory boards by law.

In 2010, a majority of the members of the ASN Bank Supervisory Board comprised members of the Management Board of SNS Bank N.V. Mr Kroeze is a member of the ASN Bank Supervisory Board as well as a Managing Director of SNS Bank, ASN Bank's shareholder. In November 2010, the decision was made to have Mr Kroeze retire and to appoint Mr De Ruigh as Supervisory Board member. This change will be effected in the beginning of 2011. This composition of the Supervisory Board aligns better with the bank's governance structure.

The Advisory Council¹²

The Advisory Council of ASN Bank was founded in 1993 when ASN Bank introduced its first investment fund. It provides requested and unrequested advice to its Management Board on its policy in relation to the bank's mission and the investment criteria derived from this mission. Originally the Council advised on investments, but that responsibility changed over the years. Nowadays, the Council monitors whether ASN Bank is delivering

¹¹ From our Annual Report 2010, P. 80/81.

¹² From our Annual Report pp. 14-16 and p. 81.

on its sustainability mission. The Management Board and the Advisory Council regularly consult about the bank's activities and results, as well as its sustainability course. The Advisory Council and the Management Board met four times in 2010.

The Advisory Council's function and position indirectly contribute to the principle of diversity of the Supervisory Board and the Management Board. The composition, (re)appointment and methods of the Council are laid down in rules.

Dutch Corporate Governance Code / Banking Code

The Dutch Corporate Governance Code (the Code) applies to all companies listed on the Dutch stock exchange. ASN Bank endorses the principles of the Code and, in general, complies with them. Our aim is to abide by the principles and best practice provisions of the Code to the extent possible.

The Banking Code contains principles that are in line with those of the Dutch Corporate Governance Code. The Banking Code applies to ASN Bank and we comply with it. For example, the ASN Bank Management Board signed the morals and ethics statement in February 2010. ASN Bank puts the customer focus required by the Banking Code into practice in its open, transparent communication with customers about its mission and investment policy. Customer focus is part of the ASN Bank culture. We promote this, for example, through individual employee targets and on the basis of the product development process, which is structured in accordance with the Banking Code.

Sustainable performance and short term bonus of Managing Directors

The Supervisory Board determines the short-term bonus based on the performance of the ASN Bank Managing Directors in three areas:

- financial, operational and sustainability performance,
- contribution to achieving the strategic objectives,
- individual performance based on individual competencies.

If a Managing Director achieves pre-set objectives, he receives the variable remuneration. When selecting performance measures, the various stakeholders are borne in mind. The performance measures are aimed at long-term success for ASN Bank, with due regard to the desired risk profile. The standards for sustainability performance are related to the qualitative sustainability objectives described in Chapter 1 of our . They also include objectives with regard to customer satisfaction and employee satisfaction.

Mission, Strategy, Sustainable Policy¹³

Mission

Our economic conduct is aimed at promoting sustainability in society. We help to secure changes that are intended to put an end to processes whose harmful effects are shifted to future generations or foisted onto the environment, nature and vulnerable communities. In doing so, we do not lose sight of the necessity to yield returns in the long run that safeguard the continued existence of our bank. We manage the funds that our customers entrust to us in a manner that does justice to their expectations.

Strategy

As a financial services provider, ASN Bank wants to do its part in achieving a sustainable society. To that end, we set demands for ourselves which ensure that we keep our promises to external stakeholders, in particular our customers. How do we do this?

- We keep setting the bar higher for our activities, according to strict criteria in the areas of sustainability, fairness, transparency, expertise and reliability.
- In order to achieve our mission, we cooperate as much as possible with partners – both NGOs and companies that operate in a sustainable manner – e.g. who help us to achieve our sustainable objectives.

¹³ From our Annual report 2010, pages 20 & 21.

- We initiate sustainable developments and support important sustainable initiatives by third parties. As the largest sustainable bank in the Netherlands, we want to be a specialist in sustainable capital growth and the leading authority in the Netherlands when it comes to the combination of sustainability and financial returns.
- ASN Bank is a direct writer, which means that we communicate with our customers directly – through the Internet, by telephone and mail.

The pillars of our sustainability policy

Sustainability is the guiding principle in all of ASN Bank's activities. We subscribe to the generally accepted definition set out in the Brundtland report: 'sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs'.

Sustainability and sustainable development are frequently only regarded as environmental objectives, but that is a misunderstanding. The aim for sustainable development is first of all inspired by a sense of justice. The purpose of sustainable actions is to arrive at a fair distribution of wealth, now and in the future. Sustainability thus includes a social aspect, which is why we build our sustainability policy on three pillars: human rights, climate change and biodiversity.

Four customer issues

Accordingly, sustainability is a major success factor for the bank of the future, but our sustainability pillars human rights, climate change and biodiversity are wide-ranging concepts. We investigated which aspects of those pillars are most important to ASN customers. Our customers proved to have a preference for four issues: they want the bank to invest their money in fair trade and renewable energy, and not in child labour or the arms industry.

We have included these four sustainability issues in our policy. In 2010, we linked these issues to the new ASN Credit Card. Together with our partnering NGOs, we translate each issue into projects. ASN Bank receives a contribution for each payment customers make with the ASN Credit Card. These contributions go directly to the projects. Customers automatically support all four issues, but may choose to focus on one or more of these issues.

Since 1 January 2011, the sustainability issues have also been linked to ASN Ideaalsparen, which has been renewed. Every ASN Ideaalsparen customer automatically supports the sustainability issues. The more money customers keep in their ASN Ideaalsparen accounts, the more money ASN Bank donates to the projects on their behalf. Customers may also indicate their preference for one or more of the four issues. We expect to donate approximately € 1.5 million to the issue projects on behalf of all ASN Ideaalsparen customers in 2011. At the end of 2010, six of the eight projects were known.

Criterion 3: The COP describes engagement with all important stakeholders¹⁴

Dialogue with stakeholders

The opinions of customers, social organisations and employees co-determine our bank's strategy. Their input weighs heavily in our consideration of what issues are truly of the essence. We use this information to adjust our methods and strategy. That does not mean that we continuously change our approach, because stability and continuity are also key values in our policy.

Customers

¹⁴ From our Annual report 2011, pages 22, 23.

One key method to gauge the opinions of our customers is through surveys. There are certain aspects that we monitor continuously, such as operational processes, our website and our magazine Spaarmotief. Occasionally, we use a survey to gauge the views of our current and potential customers regarding policy issues. In 2010, this resulted in the introduction of our four sustainability issues (as described below). We inform our customers every day through our website, www.asnbank.nl. Five times a year they receive the customer magazine Spaarmotief, with different versions for savings customers and investors. The jubilee issue of June 2010 was particularly appreciated. If they so desire, our customers also receive our e-mail newsletter, which is released five times a year.

Finally, we inform our customers of our policy and activities through the bank's annual reports and the ASN investment funds. 2010 was the first year in which we published ASN Bank Jaarmagazine 2009, a digital magazine containing our key activities and results in 2009.

As we consider it very important to meet our customers in person, we regularly organise customer meetings. On Friday 16 April the General Meeting of Shareholders of the ASN investment funds took place. As always, it drew many people. A great number of customers also attended our jubilee party on 5 June. Our Customer Contact Centre (CCC) staff are available from Monday to Friday for customers who have questions and can be reached through freephone number 0800-0380. Customers may also ask questions by e-mail or in writing.

Advisory Council

The dialogue with stakeholders has been structured in ASN Bank's Advisory Council, comprising representatives with a wide range of social backgrounds. The Council checks whether ASN Bank is living up to its sustainability mission and provides the Management Board with solicited or unsolicited advice. The Management Board and the Advisory Council regularly consult about the bank's activities and results, as well as its sustainability course. Chapter 2 includes a report of the Council's activities.

Social organisations and initiatives

We also frequently consult with social organisations in a wide range of forums and are present at events and seminars. Moreover, we support sustainable initiatives, for example through the Internet community Voor de Wereld van Morgen ('For the World of Tomorrow'), sponsorship and contributions from the ASN Foundation. The 'For the World of Tomorrow' website helps 'sustainable doers' engage in discussions, share information and make contact.

■ *Staff*

As stated, our employees are key stakeholders of ASN Banks as well. We communicate with them through department meetings, the ASN Manual, which familiarises employees with the organisation, the Intranet, e-mail newsletter Info(r)mail, and through staff meetings and other internal meetings. In addition, we assess their views through the annual SNS REAAL employee satisfaction survey. We discuss the results of that survey with our employees. Our human resources policy can be found in Chapter 8 of our Annual Report.

■ *Social organisations*

In order to achieve our mission, we cooperate as much as possible with social organisations; they make a positive contribution to our objectives and enhance our effectiveness. Our partners are primarily NGOs, but also companies that operate sustainably.

We distinguish four types of partners:

■ *Strategic partners*

We maintain structural, in-depth cooperation with our strategic partners to flesh out our mission. We also collaborate with these partners to achieve our communication and acquisition objectives. Some strategic partners are also product partners.

■ **Interest donation partners**

Our customers have the option to donate all or part of the interest they receive on certain savings accounts directly to these partners. At the end of 2010, we discontinued this option. That decision will be explained below.

■ **Product partners**

We support these partners with specific products, such as *Waddenvereniging* with the ASN *Waddendeposito* (Nature Conservation Organisation- Wetlands).

■ **Marketing partners**

Occasionally, we use our marketing partners' channels of communication to achieve our acquisition and communication objectives. Conversely, we also offer our marketing partners access to our communication channels.

<i>Social organisations in 2010</i>	<i>Strategic partner</i>	<i>Interest donation partner</i>	<i>Product partner</i>	<i>Marketing partner</i>
Amnesty International	X	X		
Astma Fonds		X		
Cordaid Kinderstem	X	X	X	
Cordaid Memisa	X		X	
Cordaid Microkrediet	X		X	
Dierenbescherming		X		
FNV Mondiaal				X
Greenpeace	X	X		
Humanistisch Verbond		X		
Landelijke Vereniging van Wereldwinkels		X		X
Milieudefensie		X		
Natuur en Milieu / Zeekracht	X			
Nederlandse Kankerbestrijding/ KWF		X		
Oxfam Novib	X	X	X	
Pax Christi		X		
Plan Nederland		X	X	
Solidaridad		X		
Stichting 10:10				X
Stichting Duurzame Waardekaart				X
Stichting Vluchteling				X
Waddenvereniging			X	

New partnerships

On the occasion of our fiftieth anniversary, we gave our customers a *Duurzame Waardekaart* (a card that allows customers to make use of a reduction when they buy sustainable products), supporting the foundation *Stichting Duurzame Waardekaart*. This card provides sustainable consumers with an attractive marketplace, which stimulates sustainable consumption. No fewer than 37 thousand customers activated their cards. Reducing CO2 emissions plays an important role in our aim for sustainability. From this perspective, the 10:10 partnership was a logical step. Originating from Great Britain, this initiative encourages everyone to cut their carbon footprints by 10% every year, beginning in 2010. More than a hundred thousand people in the Netherlands joined 10:10.

Through ASN *Jeugdsparen* (the ASN Youth savings account) we support projects for working children and street urchins of Cordaid (*Cordaid Kinderstem*) in Cameroon, India and the Philippines. In 2010 this set of projects was supplemented with a project of Cordaid Memisa in Central African Republic. Cordaid Memisa improves children's health in

Nana Mambéré, in the eastern part of the country, enhancing their chances of a good future.

Phased out in 2010

We have been a partner of *Zeekracht* (dutch initiative, literally: "Sea power"), an initiative of the foundation *Natuur en Milieu*, since 2008. However, Zeekracht did not receive a government permit in 2010 to build offshore wind farms. As a result, it was unable to achieve its original goal: to create new wind energy capacity at sea. As Zeekracht is currently not focusing on the construction of new wind farms, we decided to terminate the partnership.

Greenpeace terminated its partnership with ASN Bank at the end of 2010 due to a tightening of its policy. It is important to Greenpeace that it can work unconditionally, as a fully independent organisation. For that reason, it does not accept any money from corporate parties.

As from the end of 2010, we terminated our customers' option to donate the interest they receive on their savings accounts to a charity. Instead, we offer savings customers who have an ASN Ideaalsparen account the option of choosing one of the four sustainability issues we introduced in 2010 (see explanation below). In 2011, we expect to be able to support the projects through which we translate our sustainability issues with approximately € 1.5 million.

Looking ahead with our customers

ASN Bank strives for transparency. This means that we are clear about our policy, but also - in our view - that we include our customers' wishes in our policy determination. As mentioned under Advanced Level Criterion 1. In the run-up to our jubilee, we conducted two large surveys. We investigated what customers expect of the 'bank of the future' and we asked ASN customers about their wishes and expectations as regards our sustainability policy.

Four sustainability issues

Our customers proved to have a preference for four issues: they want the bank to invest their money in fair trade and renewable energy, and not in child labour or the arms industry.

We have included these four sustainability issues in our policy. In 2010, we linked these issues to the new ASN Credit Card. Together with our partnering NGOs, we translate each issue into projects. ASN Bank receives a contribution for each payment customers make with the ASN Credit Card. These contributions go directly to the projects. Customers automatically support all four issues, but may choose to focus on one or more of these issues.

Since 1 January 2011, the sustainability issues have also been linked to ASN Ideaalsparen, which has been renewed. Every ASN Ideaalsparen customer automatically supports the sustainability issues. The more money customers keep in their ASN Ideaalsparen accounts, the more money ASN Bank donates to the projects on their behalf. Customers may also indicate their preference for one or more of the four issues. We expect to donate approximately € 1.5 million to the issue projects on behalf of all ASN Ideaalsparen customers in 2011. At the end of 2010, six of the eight projects were known.

Issue	Organisation	Project
Fair trade	Solidaridad	sustainable textile in India

Renewable energy	Oxfam Novib	and Mali fair cocoa from the Ivory Coast
Against child labour	Natuur en Milieu	sunny neighbourhoods in the Netherlands
	Cordaid Kinderstem	help to Dalit children in India
	Plan Nederland	development of servant girls in Bangladesh
Against arms industry	War Child	protection of Congolese children

UN Goals and Issues

Criterion 4: The COP describes actions taken in support of broader UN goals and issues

In our Issue papers we refer to a broad number of UN Goals and Issues. These issue papers contain our policies in relation to human rights, climate change, biodiversity and specific sectors. They are published on our website (www.asnbank.nl) and contain the criteria for the selection of our investments. Our social partners and philanthropic activities have been described above (see criterion 3)

A couple of the UN Goals, initiatives and issues we subscribe to are mentioned below.

- **General:** ASN Bank is a member of amongst others UN Global Compact, GRI (A+ level), UNEP FI, UN PRI, except for UNEP FI our membership also entails an annual reporting obligation.
- **Human Rights:** we subscribe to the principles set out in the Universal Declaration on Human Rights, the international Bill of Rights, the ILO Core Conventions and several specialised Treaties, conventions and other relevant documents. In 2011 we will revise our Human Rights policy based on international developments, amongst which the work of UN Special Representative John Ruggie
- **Climate Change:** IPCC reports and other sources¹⁵.
- **Biodiversity:** Convention on Biological Diversity, UN Earth Summit Report, 1992;
- **Equator Principles** – for investments in large projects

Principles for Responsible Investment

In 2010, we signed the United Nations Principles for Responsible Investment (PRI). These principles were introduced in 2006 as a set of voluntary best practice standards for wealthy individuals and asset managers who want to consider the environment, society and good governance in their investment procedures. The PRI provide investors with a platform to jointly engage with companies, giving them more power to make a difference. They can also jointly submit agenda items, or shareholder resolutions, to shareholders' meetings. Many agenda items have been submitted, mainly on issues concerning climate change and human rights. The PRI members are committed to providing insight into their engagement with companies and their voting conduct.

Equator Principles

ASN Bank has adopted the Equator Principles, which apply to major project loans. These Principles require the projects to meet the social and environmental criteria set by the International Finance Corporation (IFC). The adoption of the Equator Principles reaffirms our policy to provide loans only to projects that are developed in a socially responsible manner and are in line with the requirements for sound sustainability policies. In addition to our own sustainability criteria, we apply the Equator Principles to all the projects we finance whose total value exceed \$ 10 million (we apply a limit of € 8 million). The Equator Principles distinguishes three project categories, ranging from a high possible adverse effect on the environment and human rights (category A) to a low effect (C). As we apply our own sustainability criteria, we do not finance any projects from category A. We did finance four projects from the B category, including large-scale offshore wind energy projects. Gabardan 2, a major solar energy project in France, belongs to category C. The table below shows how many projects from each category we assessed and approved in 2010.

Project category	Assessed	Approved
A	0	0
B	4	4
C	1	1

Examples taken from our Annual Report 2010, p.39 and 46

Human Rights

Criterion 5: The COP describes robust commitments, strategies or policies in the area of human rights

Suggested best practices:

We have a written policy (issue paper) on human rights that is published on our website. We subscribe to the principles set out in the Universal Declaration on Human Rights, the international Bill of Rights, the ILO Core Conventions and several specialised treaties, conventions and other relevant documents. We use these in the selection of our investments. As mentioned in the introduction, in 2010 UN Global Compact published the series *Embedding Human Rights in Business Practice* in which it referred to ASN Bank's human rights policy as an example of what a bank can do to observe human rights.¹⁶

In 2011 we will revise our Human Rights policy based on international developments, amongst which the work of UN Special Representative John Ruggie. See pages 20 and 21 of our Annual Report:

Human rights¹⁷

We understand 'human rights' to mean both civil and political rights, and economic and social rights, such as employee rights. The foundations of our human rights policy are the 1948 Universal Declaration of Human Rights and the international standards based on it. We always study the human rights situation in a country or a company before we decide to invest there.

In 2003 the United Nations released a document entitled *UN Human Rights Norms for Business*, a collection of international human rights standards jointly setting out relevant business responsibilities. In response to this document, we decided to further develop our human rights criteria in consultation with, for example, Amnesty International. As a result, we currently have strict definitions in place for child labour, employee rights and weapons, to name a few. The Global Compact of the United Nations referred to ASN Bank's human rights policy as an example of

¹⁶ *Embedding Human Rights in Practice III*, UN Global Compact, 2009. The case study can also be found here: <http://www.unglobalcompact.org/participant/823-ASN-Bank>

¹⁷ From our annual report p. 20/21.

what a bank can do to observe human rights, which was published in the series Embedding Human Rights in Business Practice.

Thanks to John Ruggie, special UN representative of the UN Secretary-General for companies and human rights, the debate about business responsibilities in the area of human rights has taken flight since 2003. John Ruggie's assignment for 2011 is to identify the role and responsibilities that companies share with countries in respect of human rights. In 2010, he already published a draft version of his plans.

Also see the answers above under Criterion 4.

Criterion 6: The COP describes effective management systems to integrate the human rights principles

Human rights criteria for the selection of investments, dialogue with companies or institutions¹⁸

Next to our impact on employees and the selection of our suppliers, the largest impact of ASN Bank on human rights is through its investments. We implement the concept of sustainable investing at ASN Bank and the ASN investment funds using three tools:

- special investment criteria in selecting investments,
- dialogue with the companies or institutions in which we invest,
- exercising the voting rights associated with equity investments.

Each of these activities is performed according to a standard procedure, ultimately leading to a specific result, i.e. approval or rejection of a company, bond or institution, the casting of a vote at a meeting of shareholders, or completion of engagement with a company. We will explain these procedures below.

The criteria on which we base our sustainability selection are described in our sustainability policy in the ASN Bank Issue Papers. We publish all our policy guidelines on our website after having obtained approval from the ASN Bank Management Board. The criteria on Human rights are described in our issue paper on Human Rights which can also be found on our website. See pages 20 and 21 of our Annual Report. Also see the answers above under Advanced Level Criteria 4 and 5.

Companies, government bonds and institutions that meet our special investment criteria are included in our 'investment universe' (see Appendix 1 of our Annual Report for a list). When structuring their portfolios, the managers of the ASN investment funds and of the ASN Bank savings make a selection from all companies and institutions that have been included in this investment universe. It depends on the financial performance of a company or institution whether it is indeed selected.

Each investment fund has its own specific investment universe. In all, there are almost three hundred and twenty listed companies that meet the special investment criteria. The managers of ASN Aandelenfonds, ASN Mixfonds, ASN Small & Midcap Fonds and ASN Milieu & Waterfonds can compile their fund portfolios by making a selection from this list. The investments of ASN Obligatiefonds and ASN Bank in government bonds and housing corporations were again tested against our sustainable investment criteria.

The first tool: selection

The selection process is one of the key procedures that we use to implement ASN Bank's mission for our customers. As said our sustainability is, first and foremost, expressed in the selection of investments on the basis of criteria in the areas of human rights, the environment and biodiversity.

¹⁸ See chapter 6 of our Annual Report 'Sustainable Investment in Practice'.

Accordingly, it is key that we can be certain that the selection occurs in accordance with our special investment criteria. The selection of sustainable investments is a complicated and thorough process that takes place according to a standard procedure. A dedicated research team is continuously active for ASN Bank, assessing whether investments meet our investment criteria. In performing their research, the analysts use information from the relevant company itself, but also information provided by specialised research agencies, the media, NGOs such as Amnesty International, and trade unions. Completed research is discussed in the ASN Selection Committee, which is comprised of the Management Board of ASN Bank and the boards of the ASN investment funds. The Committee takes its decisions on the basis of recommendations from the Sustainability Department and the analysts involved. It met five times in 2010.

The ASN Selection Committee is the only body that has the power to approve or reject an investment for the investment universe. If the Committee decides positively on an investment in a company, government or institution, we include it in our universe. All companies and countries in the universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so.

The second tool: engagement with companies

We regularly contact the companies and institutions that we or our funds invest in, with a question or a request. We do this in order to make them increasingly aware of their performance in the areas of the environment and human rights and to improve this performance. We engage in this dialogue:

1. With small and medium-sized European companies in which *ASN Small & Midcap Fonds* invests. If they do not yet fully meet our criteria, we keep in close contact in order to encourage them to pursue a business strategy of maximum sustainability. These companies receive a provisional status during this period. If a company fails to show any improvements within two years, it is removed from the universe.
2. If a company in the investment universe possibly no longer meets our investment criteria. Such a suspicion may arise from the three-yearly review or if new information is released about a company. We will ask the company to explain the situation, adjust its policy, or improve the implementation of its policy. Depending on the answers we receive, we will contact the company again. If the desired response is not obtained, the ASN Selection Committee decides whether the company should be removed from the universe.
3. By way of encouragement. Companies, institutions and projects appreciate it greatly if they are selected for our universe. This is why we inform them of their admission where possible. If we regularly contact the companies and institutions we invest in, they will understand more clearly what we expect of them in the field of human rights, environmental and biodiversity performance.

The third tool: exercising voting rights

The ASN investment funds are entitled to vote at shareholders' meetings of the companies in which they invest, which enables them to influence the policies and management of those companies. The funds cast their votes according to the mission and sustainability criteria of ASN Bank and ASN Beleggingsfondsen N.V. In recent years, we have been exercising our voting rights in an increasing number of companies. In 2010 we voted according to this sustainable voting policy at 240 shareholders' meetings worldwide: a record for ASN Bank.

In 2010 we changed the way in which we report about our voting conduct. Formerly we reported every three months; now we continuously update our voting conduct. At www.asnbank.nl, you will find details of how we voted at each shareholders' meeting and on each agenda item.

Voting for a sustainable world

Here are a few examples of the votes we cast at shareholders' meetings in 2010:

22 July 2010: British Telecom

We voted against the company's repurchase of its own shares. If the company has financial leeway, we prefer that it invests in sustainable production processes rather than its share price.

6 May 2010: Reckitt Benckiser

We voted against this British company's board remuneration policy, which included a bonus for the CEO in excess of fifteen times his salary. Sixteen percent of the participating shareholders voted against.

29 June 2010: WPP

Media, marketing and communications firm WPP was one of the first British companies to ask its shareholders for consent regarding its report on corporate social responsibility. We voted in favour, because we consider it a positive sign that WPP acknowledges the importance of human rights and the environment, also to retain financial value.

23 June 2010: Zumtobel

This Austrian LED lamp manufacturer only proposed male new Management Board members. We voted against, because we advocate a diversity policy.

The Bank and Human rights

ASN Bank is a Dutch Bank with a Dutch customer base, nevertheless we invest internationally. We comply with Dutch and European laws and policies. These set high standards in the area of human rights. Please find below an impression of how we implement this in practice in relation to employees, customers, suppliers and stakeholders:

- **Employees:** All employees sign a code of conduct which they have to comply with. The code includes issues like integrity, transparency, privacy and non-discrimination. In 2008 all employees that in their daily work come across human rights issues followed a human rights training.
- **Customers:** ASN Bank values the opinion of customers highly. We check the opinion of customers regularly by approaching them through social media and our online and hardcopy news letters. As mentioned above under criterion 1, we held a large customer survey last year, We also take all customer questions very seriously. Questions in relation to sustainability are answered by our Sustainability department. ASN Bank has a grievances procedure for customers, which is also available in English on our website.¹⁹
- **Suppliers:** We assess all suppliers in terms of our supplier policy. The social and environmental impact of the hundreds of products we purchase are highly varied, which is why we divided all products into three categories.

Category	Comprises	Policy
A: high priority	Products that we purchase in large quantities, such as bank cards	We examine these products ourselves in order to determine whether they meet our criteria.
B: average priority	Products that have a large purchasing volume, such as IT services	Signing the SNS REAAL sustainability declaration
C: low priority	Products that represent low volume, low value or low risk	Compliance with SNS REAAL's sustainability policy.

We select the high priority suppliers based on our sustainability criteria on human rights, biodiversity and climate change. The suppliers with average priority have to sign a sustainability declaration which includes issues like non-discrimination, child labour, right to organise, a healthy and safe work environment and the right

¹⁹ See: <http://www.asnbank.nl/index.asp?nid=10305>

to development. We expect that low priority suppliers comply with the sustainability policy of SNS Reaal.

- **Stakeholder consultations and meetings** in the area of human rights: we consult our stakeholders in relation to the development of our policies (Issue Papers), we are regularly in contact with the Fair Bank Guide (coalition of NGOs that provides Dutch consumers with a ranking of banks based on sustainability criteria),²⁰ we also have regular contacts with important partners and stakeholders such as Amnesty International.

Criterion 7: The COP describes effective monitoring and evaluation mechanisms of human rights Integration

Monitoring and evaluation of human rights in relation to our investments:

As described above under criterion 6, all companies and countries in the investment universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so. When for example human rights controversies come up in relation to companies or projects, we consult the company and reliable sources, such as trustworthy civil society organisations and local media. Depending on the scope and gravity of the controversy and the level of transparency and cooperativeness shown by the company, we will take action. This entails: either to further investigate the matter, to maintain or remove the company or investment from our investment universe. Data providers actively monitor human rights incidents in relation to investments. We also make use of worldwide news feeds to track possible controversies.

Monitoring and evaluation of human rights in relation to the activities of the Bank in general:

As mentioned above, we report to a number of organisations: the Equator Principles, UNPRI, Un Global Compact and GRI (A+). The Fair Bank Guide also scores Banks in the Netherlands and gave ASN Bank the green light. Out of eighteen ratings, we received fourteen 'good' ratings and four 'adequate' ratings.²¹

Criterion 8: The COP contains standardized performance indicators (including GRI) on human rights

Performance indicators in relation to our Investments

As explained above under criterion 6 and 7 all companies and countries in the investment universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so. We check all our investments on the criteria laid down in our Issue Papers. As mentioned above, we have issue papers on human rights, biodiversity and climate change. And a number of specialised issue papers on country bonds and risk countries and also for specific sectors including waste management, supranational organisations, banks and insurance companies, microfinance, social housing, transport and mobility, care and water boards.

Monitoring and evaluation of human rights in relation to the general activities of the Bank

ASN Bank applies the 'Sustainability Reporting Guidelines' (G3 A+) of the Global Reporting Initiative for drawing up the Report, as detailed in Appendix 2 of the Annual Report.

²⁰ As mentioned above under criterion 1 (recognition of our efforts), the fair Bank site shows how banks perform in areas such as climate change, human rights, nature and animal welfare, and how they deal with these issues in various economic sectors. Out of eighteen ratings, we received fourteen 'good' ratings and four 'adequate' ratings.

²¹ Ibid.

Labour Principles Implementation

Criterion 9: The COP describes robust commitments, strategies or policies in the area of labour

Labour rights in relation to our investments

Our Issue Paper on Human Rights also addresses labour rights: child labour, forced labour, health and safety, living wage and Freedom of association are all part of our Human Rights policy. We follow The ILO Core conventions and an additional number of ILO standards, such as the ILO conventions related to Health and Safety. Please find a description of the Issue Paper and process in relation to selection of investments, engagement and voting above under criterion 5 and 6.

Human resources policy²²

ASN Bank's human resources policy is grafted onto that of SNS REAAL. The SNS REAAL Collective Labour Agreement, which contains good primary and secondary benefits that comply with the market standard, also apply to our bank.

The human resources policy is based on mature labour relations: on principles of mutual responsibility, equality and due care. This is expressed, for example, in the performance and competency assessment cycle. Supervisors will use the annual planning meeting to provide specific targets for their employees that reflect their expectations of the employees for the year ahead. They will also focus on the development of competencies in view of the employee's current position and ambitions for the future.

In 2010, SNS REAAL introduced a new core value: CARE! The purpose of this new core value is to achieve SNS REAAL's mission, 'Simplicity in Finance'. The core value has four components: CARE! for the client, for each other, for society and for results. It is in close harmony with how ASN Bank treats its customers and staff. We have included the CARE! values in our performance and competency assessment cycle. Furthermore, ASN Bank has a business-specific competency: cooperation. We can deliver better performance if we cooperate, both within departments and between the bank's various departments.

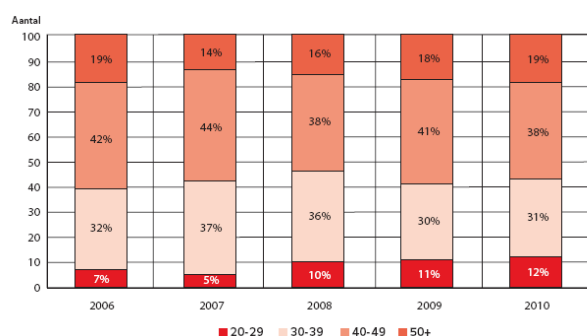
The personal development plan (PDP) is an important tool that empowers employees to control their own development. The PDP lays down in what direction an employee wants to improve and contains arrangements about the way in which he or she can reach that goal. We make internal and external training available for the further development of our employees.

Employee satisfaction

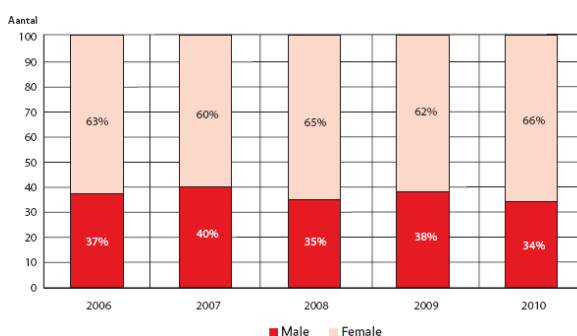
SNS REAAL conducts an employee satisfaction survey every year. In 2010, ASN Bank received a score of 8.6 out of 10, which exceeded the already high figure of 8.1 of 2009. Accordingly, ASN Bank achieved the Management Board's permanent target, i.e. a score of at least 8 out of 10. The employees are proud to be working at ASN Bank and enjoy their work. The management team and the employees have discussed the results of the survey. The action items revealed by the survey relate to career opportunities and career guidance.

²² Based on our Annual Report pages 51-53.

Composition of personnel (age)



Composition of personnel (gender)



Representation

Since the works council elections of May 2010, the SNS REAAL works council also represents the ASN Bank employees. Two members of the works council have ASN Bank as their area of attention, which made the ASN Bank Subcommittee (SC) superfluous. However, the ASN Bank Management Board and the Subcommittee members found it useful to continue their consultations in the form of a workgroup. In 2010, they consulted several times about the developments and ASN Bank's plans for the future.

Workforce developments

The number of staff remained practically the same. Absenteeism was very low in 2010: 2.9%. In 2009, this figure was higher on account of the long-term illness of one employee. Absenteeism meetings and, where necessary, proper support from the occupational physician take centre stage in our sick leave policy.

Commitment

The Management Board finds it important to involve employees in the further development of ASN Bank in various ways, for example in regular staff meetings. In these meetings we inform the employees about a range of issues, such as the bank's sustainable course and results. We also strive to further increase our employees' commitment to sustainability in various ways. For example, we visited *Ecomare* on the occasion of our fiftieth anniversary.

Criterion 10: The COP describes effective management systems to integrate the labour principles
Suggested best practices:

Management systems to integrate labour rights in relation to our investments

We implement the concept of sustainable investing at ASN Bank and the ASN investment funds using three tools:

- special investment criteria in selecting investments,
- dialogue with the companies or institutions in which we invest,
- exercising the voting rights associated with equity investments.

A description of all three mechanisms can be found above under criterion 6.

The Bank and labour rights

ASN Bank is a Dutch Bank with a Dutch customer base, nevertheless we invest internationally. We comply with Dutch and European laws and policies. These set high standards in the area of labour rights. Please find below an impression of how we implement this in practice in relation to employees, customers, suppliers and stakeholders:

- **Employees:** As described above under criterion 9, ASN Bank's human resources policy is grafted onto that of SNS REAAL. The SNS REAAL Collective Labour Agreement, which contains good primary and secondary benefits that comply with the market standard, also apply to our bank. The human resources policy is based on mature

labour relations: on principles of mutual responsibility, equality and due care. SNS REAAL conducts an employee satisfaction survey every year. In 2010 over forty ASN Bank employees followed the training on employment rights (described in the frame below).

- **Customers:** ASN Bank values the opinion of customers highly. We check the opinion of customers regularly by approaching them through social media and our online and hardcopy news letters. As mentioned above under criterion 1, we held a large customer survey last year. We also take all customer questions very seriously. Questions in relation to sustainability are answered by our Sustainability department. ASN Bank has a grievances procedure for customers, which is also available in English on our website.²³
- **Suppliers:** We assess all suppliers in terms of our supplier policy. The social and environmental impact of the hundreds of products we purchase are highly varied, which is why we divided all products into three categories.

Category	Comprises	Policy
A: high priority	Products that we purchase in large quantities, such as bank cards	We examine these products ourselves in order to determine whether they meet our criteria.
B: average priority	Products that have a large purchasing volume, such as IT services	Signing the SNS REAAL sustainability declaration
C: low priority	Products that represent low volume, low value or low risk	Compliance with SNS REAAL's sustainability policy.

We select the high priority suppliers based on our sustainability criteria on human rights, biodiversity and climate change. The suppliers with average priority have to sign a sustainability declaration which includes issues like non-discrimination, child labour, right to organise, a healthy and safe work environment and the right to development. We expect that low priority suppliers comply with the sustainability policy of *SNS Reaal*.

- **Stakeholder consultations and meetings** in the area of labour rights: we consult our stakeholders in relation to the development of our policies (Issue Papers), we are regularly in contact with the Fair Bank Guide (coalition of NGOs that provides Dutch consumers with a ranking of banks based on sustainability criteria),²⁴ we also have regular contacts with important partners and stakeholders such as *FNV Mondiaal* (the development cooperation section of one of the largest Dutch Trade Unions).

Employment rights training

In the first six months of 2010, over forty ASN Bank employees attended a training organised by FNV Mondiaal about employment rights. ASN Bank has strict criteria on employment rights. We require companies to protect these rights. If a company operates in a country that insufficiently protects employment rights or has a production facility in such a country, we expect companies to go the extra mile. Practice can prove resilient sometimes. We are regularly faced with dilemmas during our investigations into employment rights compliance. The training dealt with questions such as: What is 'decent work'? What does the International Labour Organization do? How did employment rights come into being? We extensively discussed the implementation of these rights and all related aspects. The training and discussion with specialists made the ASN people more aware of the importance of employment rights, which is also beneficial for the quality of our investigations.

²³ See: <http://www.asnbank.nl/index.asp?nid=10305>

²⁴ As mentioned above under criterion 1 (recognition of our efforts), the fair Bank site shows how banks perform in areas such as climate change, human rights, nature and animal welfare, and how they deal with these issues in various economic sectors. Out of eighteen ratings, we received fourteen 'good' ratings and four 'adequate' ratings.

Criterion 11: The COP describes effective monitoring and evaluation mechanisms of labour principles Integration

Monitoring and evaluation of labour principles in relation to our investments:

As described above under criterion 6, all companies and countries in the investment universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so. When for example labour rights controversies come up in relation to companies or projects, we consult the company and reliable sources, such as trustworthy civil society organisations and local media. Depending on the scope and gravity of the controversy and the level of transparency and cooperativeness shown by the company, we will take action. This entails: either to further investigate the matter, to maintain or remove the company or investment from our investment universe. Data providers actively monitor human rights incidents in relation to investments. We also make use of worldwide news feeds to track possible controversies.

Monitoring and evaluation of labour principles in relation to the activities of the Bank in general:

As mentioned above, we report to a number of organisations: the Equator Principles, UNPRI, Un Global Compact and GRI (A+). The Fair Bank Guide also scores Banks in the Netherlands and gave ASN Bank the green light. Out of eighteen ratings, we received fourteen 'good' ratings and four 'adequate' ratings.²⁵

Human resources policy²⁶

As described under criterion 9 above: The human resources policy is based on mature labour relations: on principles of mutual responsibility, equality and due care. This is expressed, for example, in the performance and competency assessment cycle. Supervisors will use the annual planning meeting to provide specific targets for their employees that reflect their expectations of the employees for the year ahead. They will also focus on the development of competencies in view of the employee's current position and ambitions for the future. SNS REAAL conducts an employee satisfaction survey every year.

Criterion 12: The COP contains standardized performance indicators (including GRI) on labour principles Integration

Performance indicators in relation to our Investments

As explained above under criterion 6 and 7 all companies and countries in the investment universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so. We check all our investments on the criteria laid down in our Issue Papers. As mentioned above, we have issue papers on human rights, biodiversity and climate change. And a number of specialised issue papers on country bonds and risk countries and also for specific sectors including waste management, supranational organisations, banks and insurance companies, microfinance, social housing, transport and mobility, care and water boards.

Monitoring and evaluation of labour principles in relation to the general activities of the Bank

ASN Bank applies the 'Sustainability Reporting Guidelines' (G3 A+) of the Global Reporting Initiative for drawing up the Report, as detailed in Appendix 2 of the Annual Report.

²⁵ Ibid.

²⁶ Based on our Annual Report pages 51-53.

Environmental Stewardship Implementation

Criterion 13: The COP describes robust commitments, strategies or policies in the area of environmental Stewardship

The Environment: Biodiversity and climate change

In our Issue Papers on Biodiversity and climate change we lay down our policy relating to both issues. Together with Human Rights (including labour rights) they form the pillars of our sustainability policy. We use the criteria formulated in these issue papers for the selection of our investments. Please find a description of each as given in our Annual Report 2010 below.

Climate change²⁷

Fossil fuels have been the driving force behind our economy for the past few centuries, causing increasing greenhouse gas emissions, including carbon dioxide (CO₂). Scientists say this is rapidly warming up the earth. It is absolutely vital that we limit our emissions if we are to prevent the global warming from assuming disastrous proportions. In addition, adjustments need to be made to absorb the consequences of global warming, which have now become unavoidable.

We help reduce greenhouse gases and cushion climate change by investing in:

- energy generation without carbon emissions and activities with the lowest emission of greenhouse gases possible; we invest, for example, in energy-saving measures, renewable sources of energy, low-energy buildings and energy efficiency;
- flexibility-increasing activities, such as water-related activities, micro credit and combating poverty.

We do not invest in fossil fuels, or – due to the numerous adverse effects – in nuclear energy. These principles apply to all investments in companies or institutions. When selecting government bonds, we also consider the contributions countries make to reducing carbon emissions.

Our own operations also make a contribution, because we attempt to limit carbon emissions as much as possible and compensate the remaining emissions.

Biodiversity²⁸

Biodiversity is the diversity of living organisms and the variety of their interrelationships in ecosystems. Biodiversity contributes to our prosperity, but only part of that contribution can be expressed in monetary terms. After all, many people enjoy nature. In addition, biodiversity offers valuable services through ecosystems, for example in the production of oxygen, water purification, food, fuels, raw materials, medicines, protection and recreation. Our economy could not function without these services. In the ecosystems that provide these services, there is a fragile balance between the various animals, plants and micro-organisms. It is vital that biodiversity be maintained. This is not only desirable from a moral and ethical perspective, but even necessary from an economic point of view.

As a sustainable bank, we hope to contribute to maintaining and strengthening biodiversity and ecosystems. For that reason, we specified our biodiversity investment criteria in the ASN Bank Biodiversity Issue Paper in 2010. We apply these criteria in our investment policy, for example when selecting our own investments and those of the ASN investment funds.

²⁷ From our Annual Report page 21.

²⁸ From our Annual Report page 21.

The publication of the ASN Bank Biodiversity Issue Paper has provided us with guidelines for the three pillars of our sustainability policy. They cover all the issues that are important to ASN Bank and its customers. Sector-specific issue papers describe how we apply these guidelines in the various sectors.

Criterion 14: The COP describes effective management systems to integrate the environmental principles

Management systems to integrate Biodiversity and Climate Change in relation to our investments

We implement the concept of sustainable investing at ASN Bank and the ASN investment funds using three tools:

- special investment criteria in selecting investments,
- dialogue with the companies or institutions in which we invest,
- exercising the voting rights associated with equity investments.

A description of which is given under criterion 6 above.

Climate Change

As said under criterion 14: We help reduce greenhouse gases and cushion climate change by investing in:

- energy generation without carbon emissions and activities with the lowest emission of greenhouse gases possible; we invest, for example, in energy-saving measures, renewable sources of energy, low-energy buildings and energy efficiency;
- flexibility-increasing activities, such as water-related activities, micro credit and combating poverty.

We do not invest in fossil fuels, or – due to the numerous adverse effects – in nuclear energy. These principles apply to all investments in companies or institutions. When selecting government bonds, we also consider the contributions countries make to reducing carbon emissions. Our own operations also make a contribution, because we attempt to limit carbon emissions as much as possible and compensate the remaining emissions.

The model on “direct social and environmental performance”, included under criterion 1 shows a that we by far met our target relating to carbon emissions per FTE. Our target was to achieve less than or equal to 2.17 (tonnes per annum), we achieved: 1.75 (tonnes per annum).

A unique feature of our climate change policy is our Carbon Footprint policy in relation to our investment funds. In the frame below an explanation is given:

Carbon Footprint

When you invest in a company, you also invest in its carbon emissions – or reduction. The investments of the ASN investment funds are selected on the basis of sustainability criteria for human rights and the environment. We measure our climate policy effectiveness by calculating the carbon emissions of our equity funds. To do so, we have engaged Trucost, an English research organisation specialising in determining the impact that business operations have on the environment.

In 2010, the ASN investment funds improved their climate performance for the third time in a row. While, at year-end 2009, they were still responsible for 261 tonnes of CO₂ emissions per million euros, that figure had dropped to 250 tonnes as at year-end 2010. Only the carbon emissions of ASN Milieu & Waterfonds showed a slight increase. This fund invests in companies in the waste processing, water purification and renewable energy sectors. The operations of the first two types of companies entail relatively large CO₂ emissions.

In mid-2010, ASN Aandelenfonds' investment policy was adjusted. The fund manager now actively considers companies' climate performance and their efforts to improve it. On 16 July 2010 the fund manager adjusted its portfolio accordingly, lowering carbon emissions caused by the fund's portfolio by almost 28%, from 195 to 140 tonnes of carbon emissions per million euros.

In the second half of 2010, the fund manager put more emphasis on investing in cyclical companies. However, such companies use more energy than companies in many other economic sectors. The larger stake in cyclical companies thus caused an increase of ASN Aandelenfonds' CO₂ emissions. Emissions rose to 191 tonnes per million euros as at year-end 2010, which is still significantly less than the 213 tonnes of year-end 2009.

What do these tonnes of CO₂ emissions actually entail? One hectare of North European forest can absorb 300 tonnes of CO₂ in fifty years. In 2010, the ASN investment funds were responsible for 250 tonnes of CO₂ emissions per million euros. Accordingly, we can compensate for that CO₂ impact of 2010 by planting 0.83 hectares of forest (approximately 1.3 football fields) per million euros. However, the forest must then stay there for fifty years. The MSCI All World Index requires the addition of 1.70 hectares of forest (2.6 football fields) per million euros to offset its impact of 2010.

CO₂ emission in tonnes per million euros

<i>Fund</i>	<i>% above the MSCI*</i>	<i>Improvement from 2009</i>	<i>2010</i>	<i>2009</i>	<i>2008</i>	<i>2007</i>
ASN Aandelenfonds	62,6%	10,4%	191	213	239	293
ASN Small & Midcap Fonds	36,1%	4,9%	326	343	403	473
ASN Milieu & Waterfonds	33,4%	-0,6%	340	338	344	639
Geconsolideerd	51,1%	4,4%	250	261	277	392
MSCI All World Index*		0,8%	511	515	555	491

* MSCI All World Index is the benchmark

Sustainable operations- Environmental effects²⁹

In 2010 we continued working on the main environmental effects of the ASN Bank offices, which are paper consumption and the emission of the greenhouse gas CO₂. Because of their volume, they continue to be a spearhead in 2011 as well. In the past we shared our building with third parties, but we have occupied the entire building since early 2008. This resulted in higher energy, gas and water consumption figures.

²⁹ From pages 49, 50 and 51 of our Annual Report.

	2010	2009	2008	2007	2006
CO₂ emissions¹					
CO ₂ emissions: tonnes	143	141	144	114	109
CO ₂ emissions: tonnes per FTE ²	1,75	1,82	2,22	1,98	2,17
Energy consumption					
Electricity: kWh	181.101	199.744	180.711	139.051	125.657
Electricity: kWh per FTE	2.217	2.584	2.782	2.421	2.500
Gas: m ³ Gas	29.434	24.167	26.743	19.760	19.038
Gas: m ³ per m ²	15	12	13	13	12
Paper consumption					
Paper consumption in kilograms	258.919	211.103	214.538	179.113	162.910
Kg of paper consumption per client account	0,36	0,35	0,36	0,37	0,40
Water					
Water consumption: m ³	637	604	585	458	395
Water consumption: m ³ per FTE	7,8	7,8	9,0	8,0	7,9
Waste					
Paper waste: tonnes	14,8	17,7	18,4	15,4	18,2

1 This figure comprises all transport (commuting and business mileage) and heating.

2 FTE (full-time equivalent): converted to the number of full-time staff.

Carbon neutral

Our office activities lead to carbon emissions due to the use of fossil fuels for transporting employees and gas used for heating and electricity consumption. We are reducing the net emission levels of greenhouse gases in various ways. Firstly, all our electricity is generated in sustainable ways. Secondly, we are continuously working on a reduction of energy consumption, both in the office and in the transport of employees. For example, the stricter environmental guidelines adopted in 2008 resulted in lower carbon emissions levels in 2009 and 2010. Effective 2011, we have again tightened the criteria of our lease cars. Our restrained use of airlines also translates into a reduction of carbon emissions per FTE.

Our investments in a solar cooking projects further reduces our carbon emissions, with due observance of social goals. The Solar Cooking foundation has demonstrated that these investments offset our remaining CO₂ emissions. The project does not yet include a certified carbon offsetting process. Nevertheless, we prefer to support this project as it is still in its start-up phase and has climate-related as well as social goals. At the same time, we also wanted to reduce the actual carbon emissions per FTE in 2010 to the level of 2006. Achieving a 19% reduction compared to 2006, we have amply succeeded in reaching this goal, mainly by making more efficient use of the office building.

Solar Cooking

Solar cooking is cooking with sun power. We invest in a project in Uganda where the local population uses a simple parabolic mirror to heat a pan in the focus of that mirror. This approach is a huge success. Stichting Solar Cooking Nederland has distributed thousands of these mirrors by now, saving carbon dioxide emissions and forest by strongly reducing wood burning. The women involved spend much less time on collecting wood and improve their health to boot, by inhaling far less smoke.

Reduction of paper consumption

It takes a lot of paper to inform all of ASN Bank's customers (over half a million) through, for example, bank statements, letters and our customer magazine *Spaarmotief*. Our strategy is to reduce paper and envelope consumption by further developing as an Internet bank. The target for 2010 was to keep the paper consumption at the same level as 2009 or to reduce it. Ultimately, paper consumption per client account dropped by 2.9% compared to 2009 and 10% compared to our reference year 2006. Absolute paper

consumption rose sharply compared to 2009 as a result of the strong growth of our customer base.

Suppliers

We assess all suppliers in terms of our supplier policy. The social and environmental impact of the hundreds of products we purchase are highly varied, which is why we divided all products into three categories.

<i>Category</i>	<i>Comprises</i>	<i>Policy</i>
A: high priority	Products that we purchase in large quantities, such as bank cards	We examine these products ourselves in order to determine whether they meet our criteria.
B: average priority	Products that have a large purchasing volume, such as IT services	Signing the SNS REAAL sustainability declaration
C: low priority	Products that represent low volume, low value or low risk	Compliance with SNS REAAL's sustainability policy.

We select the high priority suppliers based on our sustainability criteria on human rights, biodiversity and climate change. The suppliers with average priority have to sign a sustainability declaration which includes issues like respect for the environment and the existence of an environmental management system. We expect that low priority suppliers comply with the sustainability policy of SNS Reaal.

Stakeholder consultations and meetings in the area of biodiversity and climate change:

we consult our stakeholders in relation to the development of our policies (Issue Papers), we are regularly in contact with the Fair Bank Guide (coalition of NGOs that provides Dutch consumers with a ranking of banks based on sustainability criteria),³⁰ we also have regular contacts with important partners and stakeholders such as Natuur & Milieu (Dutch environmental organisation).

Criterion 15: The COP describes effective monitoring and evaluation mechanisms for environmental Stewardship

Monitoring and evaluation of biodiversity and climate change in relation to our investments:

As described above under criterion 6, all companies and countries in the investment universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so. When for example controversies in relation to biodiversity or climate change come up in relation to companies or projects, we consult the company and reliable sources, such as trustworthy civil society organisations and local media. Depending on the scope and gravity of the controversy and the level of transparency and cooperativeness shown by the company, we will take action. This entails: either to further investigate the matter, to maintain or remove the company or investment from our investment universe. Data providers actively monitor incidents in relation to investments. We also make use of worldwide news feeds to track possible controversies.

Monitoring and evaluation of human rights in relation to the activities of the Bank in general:

As mentioned above, we report to a number of organisations: the Equator Principles, UNPRI, Un Global Compact and GRI (A+). The Fair Bank Guide also scores Banks in the

³⁰ As mentioned above under criterion 1 (recognition of our efforts), the fair Bank site shows how banks perform in areas such as climate change, human rights, nature and animal welfare, and how they deal with these issues in various economic sectors. Out of eighteen ratings, we received fourteen 'good' ratings and four 'adequate' ratings.

Netherlands and gave ASN Bank the green light. Out of eighteen ratings, we received fourteen 'good' ratings and four 'adequate' ratings.³¹

Criterion 16: The COP contains standardized performance indicators (including GRI) on environmental Stewardship

Performance indicators in relation to our Investments

As explained above under criterion 6 and 7 all companies and countries in the investment universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so. We check all our investments on the criteria laid down in our Issue Papers. As mentioned above, we have issue papers on human rights, biodiversity and climate change. And a number of specialised issue papers on country bonds and risk countries and also for specific sectors including waste management, supranational organisations, banks and insurance companies, microfinance, social housing, transport and mobility, care and water boards.

Monitoring and evaluation of labour principles in relation to the general activities of the Bank

ASN Bank applies the 'Sustainability Reporting Guidelines' (G3 A+) of the Global Reporting Initiative for drawing up the Report, as detailed in Appendix 2 of the Annual Report.

Anti-Corruption Implementation

Criterion 17: The COP describes robust commitments, strategies or policies in the area of anti-corruption

As mentioned above ASN Bank is a Dutch Bank with a Dutch customer base, nevertheless we invest internationally. We comply with Dutch and European laws and policies. These set high standards in the area of fighting corruption and money-laundering, particularly for banks. The controlling and compliance department at ASN Bank with support of the legal and compliance department at SNS Reaal keep a close watch on the compliance with these laws and regulations. Below you will find a brief description of how we deal with these issues in practice:

Corruption in relation to investments

We do not invest in companies that are involved in corruption, that have incited others to corruption, that systematically violate their own or sector-related codes of conduct, or that are involved in financial, environmental and/or social scandals.³²

Anti-corruption in relation to the general activities of the Bank

Selection from our Annual Report of the report on corruption in relation to the GRI Indicators and UN Global Compact principles (See appendix 2 of our Annual Report for the full report):

³¹ Ibid.

³² From our Issue Paper on Human Rights.

Theme G3 and the directly relevant Global Compact

Principle numbers (GC-PR#)

Indicators (with G3 or FSSS numbering)

Can be found:

GC-PR10	SO3: Employees trained in anti-corruption	Staff are governed by an integrity policy, which also addresses the prevention of conflicts of interest and corruption
GC-PR10	SO4: Actions taken in response to incidents of corruption	No corruption incidents
	SO5: Involvement in public lobbying	Where relevant ASN Bank lobbies for a sustainable society
	SO6: Political donations	None
	SO7: Anti-competitive behaviour	See SNS REAAL's code of conduct and regulations at http://www.snsreaal.nl/werken-bij/corporate-governance-1/statuten-en-reglementen.html
	SO8: Fines	None

Client Acceptance criteria

We are obligated by law to check all customers on the basis of a couple of risk factors: these include the risks in relation to the origin of their capital and the geographical risk in relation to money laundering. If the entity, a daughter company or important business relation is based in high risk countries based on the Transparency International Corruption Perceptions Index the research of the client is more stringent. The responsible compliance and legal officers and other relevant personnel at ASN bank and within SNS Reaal are trained on these issues.³³

Criterion 18: The COP describes effective management systems to integrate the anti-corruption principle

Monitoring and evaluation of corruption in relation to our investments:

As described above under criterion 6, all companies and countries in the investment universe are reviewed and discussed within three years. If new information shows that the review should be performed earlier, we will do so. When for example controversies in relation to corruption come up in relation to companies or projects, we consult the company and reliable sources, such as trustworthy civil society organisations and local media. Depending on the scope and gravity of the controversy and the level of transparency and cooperativeness shown by the company, we will take action. This entails: either to further investigate the matter, to maintain or remove the company or investment from our investment universe. Data providers actively monitor incidents in relation to investments. We also make use of worldwide news feeds to track possible controversies.

Monitoring and evaluation of human rights in relation to the activities of the Bank in general:

As mentioned above, we report to a number of organisations: the Equator Principles, UNPRI, Un Global Compact and GRI (A+). The Fair Bank Guide also scores Banks in the Netherlands and gave ASN Bank the green light. Out of eighteen ratings, we received

³³ More information can be found here: <http://www.snsreaalvoverslag2009.nl/en/conduct/vision/>

fourteen 'good' ratings and four 'adequate' ratings.³⁴ In addition, our compliance officer and the Compliance and legal departments of SNS Reaal look after the implementation of our code of conduct and Integrity policy.

Criterion 19: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

See criterion 18.

Criterion 20: The COP contains standardized performance indicators (including GRI) on anti-corruption

See criterion 18.

Value Chain Implementation

Criterion 21: The COP describes implementation of the Global Compact principles in the value chain

Our policies and practices in relation to our investments, employees, customers, other important stakeholders and our purchasing policy have been described above. Please find below an example of the way we try to make our products as simple and transparent as possible:

Products and services:³⁵

Dutch bank consumers do not like complicated products. The demand for clear, simple products and the four sustainability issues (see Chapter 5) culminated in a major product innovation. In the autumn of 2010, we informed our customers of the new product ASN *Ideaalsparen* (savings account) for the first time. It was launched on 1 January 2011.

The new ASN *Ideaalsparen* product (savings)

What was the reason for introducing this simplification? Sustainable, transparent services entail that we regularly verify whether we could introduce any improvements for our customers. We launched various new savings accounts in the past few years, which resulted in several instant access accounts that were subject to different deposit conditions. Due to developments on the interest rate market, the savings interest rates on these accounts showed very little variety in 2010, creating some confusion for our customers.

We were one of the first banks in the Netherlands to decide to simplify our savings range and make it more attractive. We combined the positive features of the various savings products to create one new savings account: ASN *Ideaalsparen*. This account offers full freedom of deposit and access. In addition, the four sustainability issues have been linked to this account.

We introduced this simplification in stages, carefully communicating with our customers. They received the first announcement in our customer magazine *Spaarmotief* in September, followed by a personal letter and a reminder in *Spaarmotief* in December. The table below provides a concise overview of the changes.

One new feature included in ASN *Ideaalsparen* is that we are joining efforts with our customers to actively support sustainable issues: for fair trade and renewable energy and against child labour and the arms industry.

ASN Credit Card, also in combination with the ASN Bank Account, has exceeded all expectations.

³⁴ Ibid.

³⁵ Based on our Annual Report, page 42.

Legal structure

As explained above under criterion 2, our Annual Report includes a Chapter on Corporate Governance in which amongst others explains the legal structure, group structure and ownership. Also the Supervisory Board and Council give their view on the Annual Report in chapter 2.

Countries of operations

As mentioned above under criteria 6, 10, and 14: ASN Bank is a Dutch Bank with a Dutch customer base, nevertheless we invest internationally. We comply with Dutch and European laws and policies.

Products and Services

Chapter 7 of our Annual Report describes our sustainable products and services, including savings, investments, payments (ASN Bank Account and credit card) and lending. ASN Bank finances major renewable energy projects, as well as cultural, environmental and public housing initiatives, for example:

Renewable energy projects

Gabardan

In July 2010, ASN Bank provided € 17.5 million of finance to a French solar energy project. The finance concerns part of the Gabardan solar farm currently being constructed by EDF Energies Nouvelles in the south-west of France, between Bordeaux and Toulouse. The capacity of the entire Gabardan plant will be 74.6 megawatt peak (MWp). The Gabardan 2 project, cofinanced by ASN Bank, will supply 11.7 MWp of electricity, enough to power approximately five thousand households per year.

C-Power

At the end of 2010 ASN Bank financed C-Power, a wind energy park off the Belgian coast. The initial amount of finance was almost € 22 million. In addition to ASN Bank, another six financial institutions, two export credit insurers and the European Investment Bank provided finance totalling € 869 million. This finance enables the construction of the second and third stages of the wind farm, which last from 2011 up to and including 2013. This is the largest finance ever provided to offshore wind power. When C-Power is completed, it will provide energy to approximately 295,000 households and avoid an emission of 450,000 tonnes of CO₂. C-Power will provide one-tenth of the capacity that Belgium requires to meet the EU target of 13% of renewable energy by 2020.

Trianel

In December, the finance agreement for Trianel Borkum West II was concluded. This will be the largest wind turbine project at the German North Sea, comprising the design, construction and operation of the wind farm. Loans totalling € 550 million have been made available to finance the project. Eleven banks are involved in this finance, including ASN Bank.

As from the summer of 2011, the foundations for the first forty wind turbines will be laid off Borkum at a depth of thirty metres. These turbines will provide approximately two hundred thousand households with environmentally friendly energy. Almost 150 metres in height, the wind turbines will be definitively connected to the grid around 1 January 2013.

Financial results

In our Annual report we also report on our financial results see chapter 1 and 9 of our Annual report.

Criterion 23: The COP incorporates high standards of transparency and disclosure

As mentioned above, in our Annual report in Annex 2 we report on the GRI (A+ status) and the ten Global Compact principles. We also report on the Equator principles and UN PRI.

Our Annual Report contains a comparison of the results over several years on several issues, amongst which:

- The compared results in relation to our operations and Co2 emissions, energy consumption, paper consumption, water consumption and waste from 2006-2010 (see criterion 14 above)
- The compared results of the carbon footprint of our investment funds (see criterion 14 above)
- The compared results in relation to the composition of personnel since 2006 (see criterion 9 above)
- Our Annual Report 2010 also contains a comparison of the financial results since 2006 (on page 6):

	2010	2009	2008	2007	2006
Customer base	516.902	471.118*	419.792	363.334	317.683
Assets under management (in millions of euros)					
ASN Bank	7.992	6.346	4.966	3.632	2.665
ASN investment funds	1.375	1.193	983	1.255	1.167
Total assets under management	9.367	7.539	5.949	4.887	3.832
Sustainable savings and investments market share**					
	n.t.b.	48%	44%	36%	35%
Savings market share***	2,5%	2,2%	1,9%	1,5%	1,2%
Interest donations from customers to social organisations (in euros)					
	373.868	573.825	417.366	209.669	131.429
ASN Bank's contribution to social organisations (in euros)	729.013	621.246	387.973	257.087	224.939
Total contribution to social organisations	1.102.881	1.195.071	805.339	466.756	356.368

Criterion 24: The COP is independently verified by a credible third party

Our Annual Report is verified by independent Auditors, see pages 83 and 84 of our Annual Report, for the Independent Assurance Report by KPMG.