

# GRI Content Index

## Standard disclosures part I

### Profile Disclosures

Profile Disclosure	Disclosure	Level of reporting	Location of disclosure
<b>1.</b>	<b>Strategy and Analysis</b>		
1.1	Statement from the most senior decision-maker of the organisation.	●	Annual Report: page 2
1.2	Description of key impacts, risks, and opportunities.	●	Annual Report: page 6 - 7 Sustainability Report: annex 1 KPI 1, 2, 3, 4 key impacts
<b>2.</b>	<b>Organisational Profile</b>		
2.1	Name of the organisation.	●	Colophon
2.2	Primary brands, products, and/or services.	●	Annual Summary: page 8 - 10
2.3	Operational structure of the organisation, including main divisions, operating companies, subsidiaries, and joint ventures.	●	Annual Report: page 22 - 23
2.4	Location of organisation's headquarters.	●	Colophon
2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	●	<a href="https://www.rabobank.com/en/locateus/index.html">https://www.rabobank.com/en/locateus/index.html</a>
2.6	Nature of ownership and legal form.	●	Annual Report: page 22 - 23
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	●	Annual Summary: page 8 - 10
2.8	Scale of the reporting organisation.	●	Annual Report: page 6 - 7
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	●	Annual Report: page 8
2.10	Awards received in the reporting period.	●	Annual Report: page 42, 86
<b>3.</b>	<b>Report Parameters</b>		
	<b>Profile disclosure</b>		
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	●	Annual Report: colophon Sustainability Report: page 5
3.2	Date of most recent previous report (if any).	●	April 2013
3.3	Reporting cycle (annual, biennial, etc.).	●	Annual
3.4	Contact point for questions regarding the report or its contents.	●	Annual Report: colophon
	<b>Report boundaries</b>		
3.5	Process for defining report content.	●	Sustainability Report: page 5 - 6
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	●	Sustainability Report: page 6
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	●	Sustainability Report: page 6

● Fully reported   ● Partially reported   ○ Not reported

Profile Disclosure	Disclosure	Level of reporting	Location of disclosure
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations.	●	Sustainability Report: page 6
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report.	●	Sustainability Report: page 7
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	●	No material consequences
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	●	No significant changes
3.12	Table identifying the location of the Standard Disclosures in the report.	●	Corporate website: GRI content index
3.13	Policy and current practice with regard to seeking external assurance for the report.	●	Annual Report: colophon
<b>4.</b>	<b>Governance, Commitments, and Engagement</b>		
	<b>Governance</b>		
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.	●	Annual Report: page 113 - 120
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	●	Annual Report: page 117, 119 - 120
4.3	For organisations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	●	Rabobank does not have a unitary board structure
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	●	Annual Report: page 118
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).	●	Annual Report: page 103
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	●	<a href="https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html">https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html</a>
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	●	<a href="https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html">https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html</a>
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	●	<a href="https://www.rabobank.com/en/group/About_Rabobank_group/Profile/Mission_and_values.html">https://www.rabobank.com/en/group/About_Rabobank_group/Profile/Mission_and_values.html</a>
4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	●	<a href="https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html">https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html</a>
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	●	<a href="https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html">https://www.rabobank.com/en/group/About_Rabobank_group/Corporate_governance/index.html</a>
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	●	Annual Report: page 107 - 112
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	●	<a href="https://www.rabobank.com/en/group/sustainability/policies.html">https://www.rabobank.com/en/group/sustainability/policies.html</a>
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	●	NVB (Nederlandse Vereniging van Banken) EACB (European Association of Cooperative Banks) EBA (Euro Banking Association)
4.14	List of stakeholder groups engaged by the organisation.	●	Sustainability Report: page 20
4.15	Basis for identification and selection of stakeholders with whom to engage.	●	Sustainability Report: page 19

● Fully reported    ● Partially reported    ○ Not reported

Profile Disclosure	Disclosure	Level of reporting	Location of disclosure
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	●	Sustainability Report: page 19 - 25 All local banks have a members council in place to facilitate the stakeholder dialogue. The members council is a formal statutory instrument. The members council represents all types of local stakeholders and is involved in major policy. The statutes of the member bank require the members council to meet at least 1 time per year, but usually maintains a frequency of 4 times per year. This mechanism is fundamental to the cooperative structure of Rabobank. At group level the dialogue with internal and external stakeholders is institutionalised in policy development and employee participation through the works council. It is based on an issue management and stakeholder engagement plan and also occurs initiated by stakeholders. All types of engagement are admissible and used in practice. Wider and highly structured engagement on future agenda topics takes place every 3 years with external stakeholders.
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.	●	Sustainability Report: page 19 - 20

● Fully reported   ● Partially reported   ○ Not reported

## Standard disclosures part II

### Disclosures on Management Approach (DMAs)

DMAs	Disclosure	Level of reporting	Location of disclosure
	<b>FSSS indicators</b>		
<b>DMA PS</b>	<b>Disclosure on Management Approach PS</b>		
Aspects	Product Portfolio		<a href="https://www.rabobank.com/en/products_services/index.html">https://www.rabobank.com/en/products_services/index.html</a>
FS1	Policies with specific environmental and social components applied to business lines.	●	Sustainability Report: page 15
FS2	Procedures for assessing and screening environmental and social risks in business lines.	●	Sustainability Report: page 15
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	●	Sustainability Report: page 22
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	●	Sustainability Report: page 48 - 49
FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities.	●	Sustainability Report: page 19 - 22
	Audits	●	<a href="https://www.rabobank.com/en/group/sustainability/Organisation.html">https://www.rabobank.com/en/group/sustainability/Organisation.html</a>
	Active ownership	●	Sustainability Report: page 17 - 18, 35
<b>DMA EC</b>	<b>Disclosure on Management Approach EC</b>		
Aspects	- Economic Performance	●	Annual Summary: page 8 - 10
	- Market presence	●	Annual Summary: page 8 - 10
	- Indirect economic impacts	●	Sustainability Report: page 17, 41
<b>DMA EN</b>	<b>Disclosure on Management Approach EN</b>		
Aspects	- Materials	●	Sustainability Report: annex 1 KPI 4
	- Energy	●	Sustainability Report: annex 1 KPI 4
	- Water	●	Sustainability Report: annex 1 KPI 4
	- Biodiversity	●	Sustainability Report: page 22
	- Emissions, effluents and waste	●	Sustainability Report: annex 1 KPI 4
	- Products and services	●	Sustainability Report: page 28
	- Compliance	●	Sustainability Report: annex 1 KPI 4
	- Transport	●	Sustainability Report: annex 1 KPI 4
	- Overall	●	Sustainability Report: annex 1 KPI 4
<b>DMA LA</b>	<b>Disclosure on Management Approach LA</b>		
Aspects	- Employment	●	Sustainability Report: page 48 - 58
	- Labor/management relations	●	Sustainability Report: page 48 - 58
	- Occupational health and safetyCOMM	●	Sustainability Report: page 50
	- Training and education	●	Sustainability Report: page 49
	- Diversity and equal opportunity	●	Sustainability Report: page 50
	- Equal remuneration for women and men	●	Sustainability Report: page 50, 53 Sustainability Report: annex 1 Social Indicators

● Fully reported    ● Partially reported    ○ Not reported

DMA	Disclosure	Level of reporting	Location of disclosure
<b>DMA HR</b>	<b>Disclosure on Management Approach HR</b>		
Aspects	- Investment and procurement practices	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Non-discrimination	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Freedom of association and collective bargaining	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Child labor	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Prevention of forced and compulsory labor	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Security practices	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Indigenous rights	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Assessment	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
	- Remediation	●	Annual Report: page 30 - 33 Sustainability Report: page 19 - 22 <a href="https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf">https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf</a>
<b>DMA SO</b>	<b>Disclosure on Management Approach SO</b>		
Aspects	- Local communities	●	Annual Report: page 28 - 29 Sustainability Report: page 15 - 17
	- Corruption	●	Accepting or giving personal gifts that could affect the integrity of business decisionmaking is not permitted. Corruption or involvement in corruption is not acceptable, based on our Code of Conduct and other business principles. See <a href="https://www.rabobank.com/en/group/sustainability/policies.html">https://www.rabobank.com/en/group/sustainability/policies.html</a>
	- Public policy	●	Annual Report: page 33 - 36 Sustainability Report: page 22 - 25
	- Anti-competitive behavior	●	All legislation, regulations and signed covenants are strictly adhered to
	- Compliance	●	All legislation, regulations and signed covenants are strictly adhered to. Compliance policies are based on our Code of Conduct and other business principles. See <a href="https://www.rabobank.com/en/group/sustainability/policies.html">https://www.rabobank.com/en/group/sustainability/policies.html</a>

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DMA's	Disclosure	Level of reporting	Location of disclosure
<b>DMA PR</b>	<b>Disclosure on Management Approach PR</b>		
	- Customer health and safety	●	Annual Report: page 37 - 39 Sustainability Report: page 28 - 29
	- Product and service labelling	●	Annual Report: page 37 - 39 Sustainability Report: page 28 - 29
FS15	Policies for the fair design and sale of financial products and services.	●	Annual Report: page 37 - 39 Sustainability Report: page 28 - 29
	- Marketing communications	●	Annual Report: page 37 - 39 Sustainability Report: page 28 - 29
	- Customer privacy	●	Annual Report: page 37 - 39 Sustainability Report: page 28 - 29
	- Compliance	●	Annual Report: page 37 - 39 Sustainability Report: page 28 - 29

● Fully reported    ① Partially reported    ○ Not reported

# Standard disclosures part III

## Performance Indicators

Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
	<b>FSSS Prestatie-indicatoren</b>						
	<b>Product Portfolio</b>						
FS6	Percentage of the portfolio for business lines by specific region, size and by sector.	●	Annual Report: page 8 - 17	Specific data by region, size and client type is not included	Not material	The Rabobank annual report discloses information on group level, when specific developments by region or by sector have a material impact these developments are fully reported.	
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	●	Sustainability Report: page 17 - 18, annex 2 KPI 1 and KPI 2				
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	●	Sustainability Report: annex 2 KPI 1 and KPI 2				
	<b>Audit</b>						
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	●	Annual Report: page 111 Instruments, procedures and information from our CSR monitoring system are externally validated each year				
	<b>Active ownership</b>						
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues.	●	Annual Report: page 31 Sustainability Report 20	Percentage and number	Not available	The engagement approach of Rabobank is to solve CSR related problems in partnership with the client. Clients with activities identified as presenting a high social and environmental risk must commit to improvement of their processes through an action plan. This case by case approach cannot easily be captured in percentages and numbers.	2015
FS11	Percentage of assets subject to positive and negative environmental or social screening.	●	Annual Report: page 46 Sustainability Report: page 35				
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organisation holds the right to vote shares or advises on voting.	●	Annual Report: page 46 Sustainability Report: page 35				
	<b>Economic</b>						
	<b>Economic performance</b>						
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	●	Annual Report: page 25 - 26, 48, 68, 142				
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change.	●	Sustainability Report: annex 1 KPI 1 en KPI 2				
EC3	Coverage of the organisation's defined benefit plan obligations.	●	Annual Report: page 106 Sustainability Report: page 58				

● Fully reported ● Partially reported ○ Not reported

Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
EC4	Significant financial assistance received from government.	●	Rabobank does not receive financial assistance from government				
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	○			Not material	The remuneration policy of Rabobank is to promote fairness and consistency to remuneration. External benchmarking should aim at paying no more than the median level within the relevant market for established businesses and jobs, based on total reward. Rabobank is sailing its own - relatively moderate - course when it comes to defining pay levels.	
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	●	It is common practice for local member banks in the Netherlands to work with locally based suppliers as much as possible.	Proportion of spending on locally based suppliers	Not material	The volume of local purchases is low compared to central purchases. For central procurement Rabobank uses the FIRA Rating System, which tells procurement officers about the CSR profile of suppliers.	
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	○			Not material	No specific policy available because this is not material to Rabobank nor to stakeholders.	
	<b>Indirect economic impacts</b>						
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	●	Sustainability Report: page 12, 17, 41 - 44				
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	●	Sustainability Report: page 12, 17, 41 - 44				
	<b>Environmental indicators</b>						
	<b>Materials</b>						
EN1	Materials used by weight or volume.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN2	Percentage of materials used that are recycled input materials.	○			Not material	The volume of materials used is low.	
	<b>Energy</b>						
EN3	Direct energy consumption by primary energy source.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN4	Indirect energy consumption by primary source.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN5	Energy saved due to conservation and efficiency improvements.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
	<b>Water</b>						
EN8	Total water withdrawal by source.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4 (all water withdrawal is from municipal water supplies)				
EN9	Water sources significantly affected by withdrawal of water.	○			Not material	The volume of water withdrawal is low.	
EN10	Percentage and total volume of water recycled and reused.	○			Not material	The volume of water withdrawal is low.	

● Fully reported ● Partially reported ○ Not reported



Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
	<b>Biodiversity</b>						
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	○			Not material	Given the nature of the business and business locations this indicator is not material to Rabobank.	
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	○			Not material	Biodiversity as a criterion is included in the credit policy and is considered in the investment services.	
EN13	Habitats protected or restored.	○			Not material	Given the nature of the business and business locations this indicator is not material to Rabobank.	
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	●	Sustainability Report: page 16, 41				
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	○			Not material	Given the nature of the business and business locations this indicator is not material to Rabobank.	
	<b>Emissions, effluents and waste</b>						
EN16	Total direct and indirect greenhouse gas emissions by weight.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN17	Other relevant indirect greenhouse gas emissions by weight.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN19	Emissions of ozone-depleting substances by weight.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
EN20	NOx, SOx, and other significant air emissions by type and weight.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4	No breakdown by type of emission/gas.	Not material	Climate footprint almost completely consists of carbon emissions. Other greenhouse gasses are expressed in carbon equivalents and included in our greenhouse gas emission statements.	
EN21	Total water discharge by quality and destination.	○			Not material	Given the nature of the business and business locations this indicator is not material to Rabobank.	
EN22	Total weight of waste by type and disposal method.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4	No specification by type and disposal method	Not material	The policy is to collect and process waste for recovery as much as possible. The aim is to keep the volume of residual waste as low as possible. There are no group-wide figures for the processing of residual waste, most of the residual waste is processed in waste incineration.	
EN23	Total number and volume of significant spills.	○			Not applicable	No significant spills. Given the nature of the business and business locations this indicator is not material to Rabobank.	
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	○			Not applicable	No significant volumes of transported waste. Given the nature of the business and business locations this indicator is not material to Rabobank.	
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff.	○			Not applicable	No significant discharges of water. Given the nature of the business and business locations this indicator is not material to Rabobank.	

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Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
	<b>Products and services</b>						
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	●	Sustainability Report: page 19, 21, 26 - 27				
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	○			Not applicable	No significant packaging. Given the nature of the business and business locations this indicator is not material to Rabobank.	
	<b>Compliance</b>						
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	●	No significant fines or non-monetary sanctions in 2013 for non-compliance with environmental laws and regulations				
	<b>Transport</b>						
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.	●	Sustainability Report: page 26 - 27, annex 1 KPI 4				
	<b>Overall</b>						
EN30	Total environmental protection expenditures and investments by type.	○			Not material	Rabobank sees it as its responsibility to participate in the quest for the necessary, sustainable solutions that have little or no impact on the environment and that deal as conservatively and efficiently with raw materials as possible (refer also to our Food & Agribusiness Principles). Attention to the environmental impact is embedded in the Rabobank Group Code of Conduct. Rabobank has been operating on a climate neutral basis since 2007.	
	<b>Social: Labor Practices and Decent Work</b>						
	<b>Employment</b>						
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	●	Sustainability Report: annex 1 social indicators	Gender breakdown for employment contract types	Not available	The data is captured but until now it is not reported.	2015
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	●	Sustainability Report: annex 1 social indicators	No data per region	Not material	Only data at group level. Further specification is not material for stakeholders.	
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	●	Rabobank employees in the Netherlands get discounts on mortgage financing, the most common private insurance and group health insurance.				
LA15	Return to work and retention rates after parental leave, by gender.	○			Not available	After the paid maternity leave or unpaid parental leave the employee will in principle return to the same work that he/she has been in prior to the leave.	2015

● Fully reported   ● Partially reported   ○ Not reported

Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
	<b>Labor/management relations</b>						
LA4	Percentage of employees covered by collective bargaining agreements.	●	100% in the Netherlands with the exception of senior and executive management (salary scales senior and executive kader).				
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	●	In the Netherlands 1 month, Internationally the notice periods vary due to legal requirements.				
	<b>Occupational health and safety</b>						
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	○			Not material	Non-core indicator. The costs of implementation outweigh the advantages.	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	●	Sustainability Report: annex 1 social indicators	Rates of injury, occupational diseases, lost days, workrelated fatalities.	Not material	Other breakdowns and variables are not deemed material because lost days, injury rates and occupational diseases are included in the absenteeism figures.	
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	○			Not material	Given the nature of the business and business locations this indicator is not material to Rabobank.	
LA9	Health and safety topics covered in formal agreements with trade unions.	●	Annual Report: page 97 - 98 Sustainability Report: page 50 - 51				
	<b>Training and education</b>						
LA10	Average hours of training per year per employee by gender, and by employee category.	○			Not material	Training cost figures are reported in the social indicators in annex 1. Benefits and materiality of training in terms of hours spent do not outweigh the cost of implementation.	
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	●	Annual Report: page 98 Sustainability Report: page 49				
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	●	Sustainability Report: annex 1 social indicators				
	<b>Diversity and equal opportunity</b>						
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	●	Sustainability Report: annex 1 social indicators	Minority breakdown not available	Not material	Legal reasons prevent adequate measurement.	
	<b>Equal remuneration for women and men</b>						
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	●	Sustainability Report: annex 1 social indicators				

● Fully reported   ● Partially reported   ○ Not reported

Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
	<b>Social: Human Rights</b>						
	<b>Investment and procurement practices</b>						
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	○			Not material	Rabobank's human rights policy is in line with the UN's human rights framework for multinationals.	
HR2	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	●	The Rabobank Group insists that all its suppliers (100%) respect human rights and take reasonable steps to satisfy it that this precondition is being met. The Rabobank Group monitors this by screening and engaging with suppliers to ensure that they follow the same principles as the Rabobank Group does.				
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	○			Not available	Non-core indicator. Cost of implementation outweighs benefits.	2015
	<b>Non-discrimination</b>						
HR4	Total number of incidents of discrimination and corrective actions taken.	●	Five incidents reported in 2013, the incidents are being reviewed according to Rabobank's regulations to resolve undesirable behaviour.				
	<b>Freedom of association and collective bargaining</b>						
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	●	Rabobank fully respects the rights of workers, including but not limited to freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour; and the elimination of discrimination with respect to employment and occupation.				
	<b>Child labor</b>						
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	●	Rabobank fully respects the rights of workers, including but not limited to freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour; and the elimination of discrimination with respect to employment and occupation.				
	<b>Prevention of forced and compulsory labor</b>						
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	●	Rabobank fully respects the rights of workers, including but not limited to freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour; and the elimination of discrimination with respect to employment and occupation.				

● Fully reported   ● Partially reported   ○ Not reported

Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
	<b>Security practices</b>						
HR8	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations.	○			Not material	This is not a material or significant indicator in view of the nature of our sector.	
	<b>Indigenous rights</b>						
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	○			Not applicable	Not applicable to our business.	
	<b>Assessment</b>						
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	●	Sustainability Report: page 21 - 22	Percentage and number	Not available	The Rabobank Human Rights policy is being implemented but reliable data for reporting purposes is not yet available.	2015
	<b>Remediation</b>						
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	●	Sustainability Report: page 21 - 22	Number	Not available	The Rabobank Human Rights policy is being implemented but reliable data for reporting purposes is not yet available.	2015
	<b>Social: Society</b>						
	<b>Local communities</b>						
SO1 (FSSS)	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	●	Sustainability Report: page 10, 12, 13 - 17				
SO1 (G3.1)	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	●	100%				
FS13	Access points in low-populated or economically disadvantaged areas by type.	●	Sustainability Report: page 46 - 49				
FS14	Initiatives to improve access to financial services for disadvantaged people.	●	Sustainability Report: page 30, 50				
SO9	Operations with significant potential or actual negative impacts on local communities.	●	Sustainability Report: page 21				
SO10	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	●	Sustainability Report: page 21				
	<b>Corruption</b>						
SO2	Percentage and total number of business units analysed for risks related to corruption.	○			Proprietary information	Disclosing this information could be potentially harmful to the company. Rabobank Group has anti-corruption policies in place.	
SO3	Percentage of employees trained in organisation's anti-corruption policies and procedures.	○			Proprietary information	Disclosing this information could be potentially harmful to the company. Rabobank Group has anti-corruption policies in place.	
SO4	Actions taken in response to incidents of corruption.	●	No incidents of corruption				
	<b>Public policy</b>						
SO5	Public policy positions and participation in public policy development and lobbying.	●	Annual Report: page 33 - 36 Sustainability Report: page 22 - 25				
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	●	Total value is zero				

● Fully reported   ● Partially reported   ○ Not reported

Indicator	Disclosure	Level of reporting	Location of disclosure	For partially reported disclosures, indicate the part not reported	Reason for omission	Explanation for the reason for omission	To be reported in
	<b>Anti-competitive behavior</b>						
SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	●	Total number is zero				
	<b>Compliance</b>						
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	●	Annual Report: page 66 - 67				
	<b>Social: Product Responsibility</b>						
	<b>Customer health and safety</b>						
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	○			Not applicable	Not applicable in view of the type of products and services.	
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	○			Not applicable	Not applicable in view of the type of products and services.	
	<b>Product and service labelling</b>						
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	●	Sustainability Report: page 28				
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	●	24 incidents				
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	●	Sustainability Report: page 28				
FS16	Initiatives to enhance financial literacy by type of beneficiary.	●	Sustainability Report: page 17, 28, annex 1 KPI 3				
	<b>Marketing communications</b>						
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	●	Sustainability Report: page 28 - 30				
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	●	23 incidents				
	<b>Customer privacy</b>						
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	○			Proprietary information	The Dutch Banking Association publishes the cumulative damage for cybercrime. The agreement is not to report individually per bank but collectively.	
	<b>Compliance</b>						
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	●	Eur 783 thousand				

● Fully reported   ● Partially reported   ○ Not reported



## Statement GRI Application Level Check

GRI hereby states that **Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.** has presented its report "Annual Report 2013 Rabobank Group" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level A+.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines. For methodology, see [www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf](http://www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf)

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 7 April 2014

A handwritten signature in black ink, appearing to read "Ásthildur Hjaltadóttir".

Ásthildur Hjaltadóttir  
Director Services  
Global Reporting Initiative



The "+" has been added to this Application Level because Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A. has submitted (part of) this report for external assurance. GRI accepts the reporter's own criteria for choosing the relevant assurance provider.

*The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. [www.globalreporting.org](http://www.globalreporting.org)*

**Disclaimer:** Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 19 March 2014. GRI explicitly excludes the statement being applied to any later changes to such material.