



ING

**Modern Slavery
Statement 2025**

Preface

Human rights are universal. This means that every person around the world deserves to be treated with dignity and have their interests considered equally. This includes the right to work free from forced labour, human trafficking, and other forms of modern slavery.

Modern slavery and broader human rights risks may occur in the financial sector. As a bank, we serve different roles: as a provider of financial services to individuals, a corporate lender, an employer, and a procurer of goods and services. In these roles, risks of modern slavery may arise, particularly in global supply chains and business relationships operating in high-risk regions or sectors.

We therefore consider it important to understand the potential human rights impacts, including modern slavery risks, that we may cause, contribute to or be linked to in the different roles we have. Once these impacts are identified, including risks of modern slavery, we can prioritise their management and mitigation.

About this statement

This is a joint statement made pursuant to Section 54 of the UK Modern Slavery Act 2015 and Section 14 of the Australian Modern Slavery Act 2018 for the financial year ending 31 December 2025. It applies to companies within ING Bank N.V. that are required to produce a statement, as listed in the Appendix I (**“ING Reporting Entities”**). The statement sets out the actions taken by ING to address modern slavery risks in our operations, business and supply chain.¹

¹ For our broader ESG risk management approach, it can be found in ING Group Annual Report 2025.

1 About ING

ING Bank N.V. is a wholly owned subsidiary of ING Groep N.V. domiciled in Amsterdam, the Netherlands. Globally, we have more than 60,000 employees and we are a leading European universal bank with global activities, offering financial services to Retail Banking customers and Wholesale Banking clients in over 100 countries. In the UK, we serve Wholesale Banking clients, while in Australia, we serve both Wholesale Banking clients and Retail Banking customers. We process payments, accept and safeguard deposits, provide loans, enable investments and deliver other financial services.

The table below reflects the core operations and activities across our value chain.

ING's value chain - key activities and how they relate to business actors						
	Upstream		Own operations		Downstream	
	Supply chain	Own operations	Wholesale Banking	Business Banking	Retail Banking	Private Individuals & Private Banking
Activities, products & services	Management of providers of goods and services	- Employee management - Property management (e.g. office sites, buildings, data centres)	- Wholesale lending (incl. pre-settlement) - Daily Banking (payment & cash management) - Trade Finance - Deposits (incl. saving accounts) - Financial Markets activities - Capital Markets Advisory	- Business lending - Daily Banking (payment & cash management) - Trade Finance - Deposits (incl. saving accounts) - Assets under Management (AuM)	- Mortgages - Daily Banking (payment & cash management) - Deposits (incl. saving accounts) - Consumer lending - Retail insurance - Assets under Management (AuM)	- Group Treasury - High Quality Liquid Assets - Hedging instruments - Debt instruments - Shareholder's equity - ING Group Investments - Equity holdings
Underlying actors	Corporates	Employees	- Large corporates (incl. financial institutions) - Sovereign, sub-sovereign and agencies	- Micro enterprises - Small corporates - Medium corporates	- Private Individual customers - Private Banking clients	- Sovereign, sub-sovereign and agencies - Corporate clients (incl. financial institutions)

Figure 1 Our value chain

Where this statement refers to "ING", "ING Group", "Group", "we", "us", or "our", it is a reference to the broader ING group of companies. Where it refers to "ING Australia" or "IBAL", it refers to the entities operating in Australia. The table in Appendix I summarises the legal entities in scope for the reporting in Australia and the UK.

2 Modern slavery risks

As a bank, we recognise the impact of human rights through our various roles across different parts of the value chain. We serve as a provider of financial services to individuals and a corporate lender in our downstream value chain, an employer in our own operations, and as a procurer of goods and services in our upstream value chain. Therefore, in 2023, ING conducted a salient human rights issue assessment based on these different operating roles. The outcome of this assessment, published in ING Human Rights Report², identified modern slavery as one of the salient human rights issues in our roles as a corporate lender and as a procurer of services and goods.

2.1 Wholesale Banking

The assessment in the ING Group Human Rights Report looked at the following sectors we finance, namely: chemicals, healthcare and pharmaceuticals; energy; food and agriculture; infrastructure (includes building and construction, and transportation and logistics); manufacturing and heavy industries; metals and mining; real estate; services (includes consultancy services, catering, customer services, etc.); telecommunications, media and technology. Our severity and likelihood assessment identified three salient issues related to our Wholesale Banking activities: child labour; forced labour; and land and resource-related community issues.

Child labour and forced labour are salient issues that are most likely to occur with companies active in challenging environments with multiple tiers of supply chain, such as commodities trading, food and agriculture, mining, manufacturing and construction. Alternatively for companies that operate in

² For more details, please refer to [ING Human Rights Report](#).

areas known to be at greater risk of human rights issues and/or those clients who do not have adequate management systems in place.

We continue to carry out environmental and social assessment as part of Know Your Customer (“KYC”) and risk management process. For more information on how we manage our ESG risk, please refer to section 3.2.

See our Human Rights Report for a full description of our methodology and findings.

2.2 Retail Banking

In ING Group Human Rights report³, we identified human trafficking and modern slavery as risks of our Retail Banking activities, although not salient risks. We described how we manage human trafficking risk because it is an issue faced by ING and the financial industry as a whole.

We recognise that failure to detect signals of money laundering related to human trafficking and modern slavery may result in the lives of customers and/or other people being substantially harmed. This failure may occur through deficient monitoring of bank data through our Customer Due Diligence (“CDD”) and KYC processes, or through customer interaction. For instance, if a customer is a human trafficker and their activities remain undetected, the safety, security and dignity of their victims are at risk. If a customer is a victim of human trafficking, failure to detect signals of money laundering related to socio-economic fraud and human trafficking may stand in the way of saving that client from a harmful practice.

We continue to invest in controls aimed at flagging any circumstance in which our financial services may be facilitating human trafficking (such as through money laundering occurring via ING accounts). For more information on how we manage our ESG risk, please refer to section 3.2.

2.3 Our supply chain

We acknowledge that modern slavery is a potential human rights risk in our supply chain and that the risks of modern slavery are greater in our supply chain of corporate merchandise and electronics including IT hardware, telecommunications equipment. We recognise that our suppliers may indirectly source components or raw materials from jurisdictions with a higher prevalence of, or vulnerability to, modern slavery, which in turn links our own supply chain to modern slavery risks. Logistics, catering and cleaning are industries generally considered to have a higher risk for modern slavery due to the prevalence of subcontracting arrangements leading to decreased supply chain transparency. The risks in these sectors are exacerbated by labour intensive work coupled with low barriers to entry, often attracting workers from vulnerable backgrounds including migrant workers who may have limited understanding of their rights. This primarily arises from our assessment of industry risk.

2.4 Double materiality assessment

Since 2024, we have conducted the double materiality assessment (“DMA”) annually in accordance with the European Sustainability Reporting Standards (“ESRS”). This DMA has become the core process that defines how ESG risks are integrated into ING's business strategy and into the risk management framework for each risk category or type. As part of the DMA, we assess the negative impacts (including modern slavery) related to workers in the value chain and our own workforce.

³ For more details, please refer to [ING Human Rights Report](#).

As of FY2025, ING Group has not identified material negative impacts with regards to our own workforce and workers in the value chain. To learn more, please see pages 96-101 of [ING Group Annual Report 2025](#).

3 Our policies and procedures

ING adopts a group-wide approach to managing modern slavery risks and is guided by the standards set out in, among others:

1. the International Bill of Human Rights;
2. the Fundamental / Core Conventions of the International Labour Organisation (“ILO Conventions”);
3. the Ten Principles of the United Nations Global Compact;
4. the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
5. the United Nations Guiding Principles on Business and Human Rights (“UNGPs”);
6. International Finance Corporation (“IFC”) Performance Standards on Environmental and Social Sustainability;
7. the World Bank Group Environmental, Health, and Safety (“EHS”) Guidelines; and
8. the Equator Principles.

3.1 ING Orange Code and the Global Code of Conduct

The Orange Code comprises the ING values and the ING behaviours. It describes what we can expect from each other when we turn up to work each day. It is a set of standards that we collectively value, strive to live up to, and invite others to measure us by.

Building on the values and behaviours of our Orange Code, the ING Global Code of Conduct outlines the 10 conduct principles expected from employees. The Global Code of Conduct aims to prevent and protect our employees from making unethical and/or illegal decisions within ING’s day-to-day business. The 10 conduct principles are shown below. Conduct principles are further governed via their respective policy frameworks.



Figure 2 10 principles of our code of conduct

3.2 ESG Risk Framework

The ESG Risk Framework provides a definition of ESG risk as a driver of existing risk typologies, the governance structure supporting the management of ESG risk, and an overview of the various roles and responsibilities related to ESG risk. It assists in managing ESG risk effectively through the application of the risk management process at various levels of the organisation.

Under the ESG Risk framework is our ESG Risk policy⁴ and a set of mandatory instructions, through which we have identified several sectors that have an increased risk of harmful child and forced labour, among other social risks. Energy, Manufacturing, Forestry and Agri-Commodities, Construction and Metals and Mining sectors are known to be associated with harmful labour practices. When we engage with clients, social and human rights-related risks are assessed alongside other risks in the credit approval process. Clients and transactions will be evaluated according to their own sector policy (if applicable) and in any case according to our overarching human rights standards.

3.3 Anti-Money Laundering/Counter Terrorist Financing and Sanctions related Policies

The proceeds subject to money laundering can come from crimes such as modern slavery (including human trafficking). As a gatekeeper to the financial system, we have an important role in the collective fight against financial and economic crimes. By performing due diligence on business relationships and monitoring transactions, it enables ING to detect and prevent the financial system from being misused in criminal activities, including money laundering and terrorist financing, for the safety and security of our customers and society.

For more information, see: <https://ing.com/about-us/compliance/financial-economic-crime-statement>.

3.4 Anti-Bribery and Corruption related Policy

Corruption often plays an enabling role in modern slavery - as many contemporary forms of slavery rely on corruption to operate. ING addresses financial crime and business conduct risks related to bribery and corruption through regularly assessing the risks of our activities, as well as of our client and third-party relationships. ING has a zero-tolerance approach to bribery and corruption in all our relationships and business dealings as part of our commitment to conduct business in an honest, prudent, and responsible manner. ING does not permit accepting or paying bribes or offering improper inducements or anything that could be perceived as such. ING expects the same from its business partners and third parties that perform services or deliver business on its behalf.

For more information, see: <https://ing.com/about-us/compliance/zero-tolerance-bribery-statement>.

3.5 Whistleblower policy

We encourage a culture in which reporters can raise concerns where they have reasonable grounds to suspect criminal conduct, unethical conduct or other misconduct without having to fear any adverse consequences. Our Whistleblower Policy in line with the Orange Code values ('we are honest, prudent and responsible') is intended to encourage and protect whistleblowers who come forward and report (alleged) concerns. This is applicable to employees (as defined within the Whistleblower Policy), former employees, candidates, and parties with whom ING has a business relationship with (such as contractors, subcontractors and suppliers), collectively referred to as reporters in this policy.

⁴ From time to time, we may have a local annex attached to this policy for a particular jurisdiction in order to address the requirements for that jurisdiction.

Through this policy, it increases the likelihood of alerting management to concerns so they can be addressed to help ING create a better and safer business by preventing non-compliance with the Orange Code, Policies, laws and regulations.

For more information, see: <https://ing.com/about-us/compliance/whistleblower-policy>.

3.6 Complaint procedure

Customers, shareholders, suppliers and other stakeholders can report their suspicions about our conduct to ING Group Chief Compliance Officer. After the complaint about our conduct has been received by ING Group Chief Compliance Officer, an acknowledgement of receipt will be sent within seven days. Based on the information provided, the complaint about our conduct will be investigated within a reasonable timeframe. Often, follow-up contact is needed for further clarification, contact will be sought via the available (anonymous) communication channels. An update on the follow-up of the concern will be shared within three (and in exceptional situations, six) months after ING's acknowledgement of receipt. It is open to all third parties and specifically refers to the possibility of addressing human rights issues via this channel.

For more information, see <https://ing.com/about-us/compliance/complaints-about-our-conduct>.⁵

4 Our actions

4.1 Our workplace

As a globally operating bank, we are continuously navigating the complexities of global and local regulations. In some instances, we set general, globally applicable policies to help address the material risks and material negative impacts our workforce may face, with consideration for local laws and regulations which may necessitate tailored local policies to achieve full compliance. ING maintains workforce-related policies designed to mitigate discrimination, misconduct and other workforce-related risks. Our global strategy was endorsed by ING's senior management, approved by the management boards and supported by the Supervisory Board to work towards the ambitions set out in our policies.

In Australia, for example, all employees are covered by the National Employment Standards (NES) under the Fair Work Act 2009, which set minimum statutory employment entitlements. Employee wages and conditions are further underpinned by the Banking, Finance and Insurance Award 2020, and, where applicable, the 2014 IBAL Enterprise Agreement, which provides more beneficial terms than the Award. Employees excluded from the Enterprise Agreement due to seniority remain entitled to the NES and are paid above Award minimum rates. An annual remuneration review is conducted by HR's Performance & Reward to ensure compliance. Employees have freedom of association and the right to collective bargaining in accordance with Australian law.

4.2 Our business

4.2.1 Know Your Customer ("KYC")

KYC is one of the steps towards a safe and compliant bank. This includes carrying out Customer Due Diligence checks, updating customer files, screening customers and transactions, monitoring transactions and reporting suspicious activities. We also carry out environmental and social risk assessments as part of the KYC process. In this assessment we review, amongst others, the company's approach to identifying and managing potential human rights issues and its efforts to

⁵ From time to time, we may have a local annex attached to this policy for a particular jurisdiction in order to address the requirements for that jurisdiction.

understand its supply chain. We review the company's commitment to engage with local stakeholders (including affected communities), and its procedure in managing grievances. Furthermore, we evaluate the purpose of the finance we provide to understand whether we may become linked to operations that may or allegedly have human rights abuses.

4.2.2 ESG Risk Assessment

For Wholesale Banking, ING has developed an ESG risk assessment approach which considers the environmental, social and governance risk factors, potential negative impacts and dependencies of our clients. ING has tooling in place to support the assessment as part of the wider credit approval process. This assessment includes both environmental, social and governance indicators that are assessed on client and transaction level. The social indicators reference potential risks in relation to a company's workforce, communities and/or customers. Depending on the ESG risk assessment outcome and the impact on financial risks, additional due diligence and mitigation might be required and factored in as one factor of the broader credit risk assessment.

For project-related loans that concern the development of a new asset (e.g. plant, mine, roads or ports), we require an environmental and social consultant to periodically monitor our client and the asset under financing to verify ongoing compliance with ING's environmental, social, and human rights standards, as well as international standards. If potential human rights abuse in relation to our client's operations are identified, we prioritise these cases and aim to engage with our clients and other stakeholders, seeking to understand and improve the situation on the ground. Our engagement with clients depends on a number of factors, including the type of financial products we provide. Our influence is also informed by the nature of the lending transaction, the duration of the loan, the point at which commercial lenders are invited to provide financing, and often whether ING has a leading role or is part of a larger loan syndicate with other banks.

We apply the Equator Principles for projects in scope of the principles. As part of the IFC Performance Standards and World Bank Group EHS Guidelines under the Equator Principles, promoting safe and healthy working conditions, and the avoidance of forced labour and harmful child labour is an essential requirement when financing projects.

Our Business Banking clients are subject to a self-evaluation when active in pre-selected industries: animal husbandry, employment agencies, building materials (wood), fruit-growing and horticulture, shipping and ports, home construction and house building, freight, clothing and footwear and leather products, chemical advanced materials, farm products and food (meat products).

The ESG risk governance and assessment tools that we have in place help us to evaluate our corporate clients' capacity to manage the risks. Periodically we review our clients and transactions, and this takes place throughout the entire lifetime of the relationship. ING takes a risk-based approach on ESG risk topics, meaning that the higher the perceived risk level, the more extensive the due diligence process and review will be. Depending on the level of risk assigned, a review typically occurs every 1-3 years. For high-risk engagements a thorough review takes place on a yearly basis.

To learn more, please see pages 205-209 of [ING Group Annual Report 2025](#).

4.3 Our supply chain

ING purchases goods and services from thousands of suppliers around the world. Globally, our procurement spending spans the following categories: Facility management & Travel and expenses, Generic IT, IT & Operations, Marketing & Communication, Professional Services and Insurance.

For the ING reporting entities operating in the UK, the three largest categories of direct supplier spendings are:

1. Human resources (Benefits & Recruitment);
2. Facility management & Real estate; and
3. External Market Data.

For the ING reporting entities operating in Australia, the three largest categories of direct supplier spendings are:

1. IT and non-IT related professional services;
2. Technology and telecommunications; and
3. Marketing and promotions.

4.3.1 Know Your Supplier (“KYS”)

Since 2012, ING has embedded social and environmental responsibility requirements into its procurement processes. The sustainability component of the KYS process assess a supplier’s alignment with key environmental and social criteria, including commitments to the United Nations Global Compact Principles and compliance with Modern Slavery regulations. Suppliers requiring deeper assessment must complete a supplier questionnaire and agree to comply with ING’s environmental and social policies, covering human rights, no forced and child labour, fair working conditions, environmental protection, anti-corruption, and modern slavery.

The questionnaire includes a specific question regarding the application of the UNGPs, which requires suppliers to confirm that they adhere to, or have measures in place that align with, the UNGPs. This includes a policy commitment to meet the organisation’s responsibility to respect human rights; carrying out a human rights due diligence process to identify, prevent, mitigate and account for how the organisation addresses its impacts on human rights; and having processes in place that enable the remediation of any adverse human rights impacts that the organisation causes, contributes to, or is linked to. Additionally, one of the questions addressed to our suppliers in this process specifically refers to legislation in relation to Modern Slavery, including human rights (e.g. protection of human rights, no human rights abuses) and labour (e.g. no forced and compulsory labour, abolish harmful child labour).

The KYS assessment is conducted based on external information as well as information directly provided by the supplier that addresses questions on how they manage potential human rights impacts. The KYS assessment is periodically repeated for our supplier base.

Suppliers that successfully complete the full KYS process receive qualified status and become eligible to work with ING. In respect of ING Australia, IBAL continued to implement the three-phased approach⁶ to assessing and addressing modern slavery risks within its supply chain. Our procurement team in Australia has also been trained in the inclusion of modern slavery contractual requirements in supplier agreements.

We continued to develop our procurement approach in 2025, and we launched across the whole network a standardised set of questionnaires, which include human rights related questions and criteria, that can be used in the tenders executed in ING. There are also additional questions related to modern slavery for procurement categories where salient inherent human rights risks exist.

⁶ Phase 1 is governance and risk assessment, Phase 2 is implementation, which include modern slavery-screening questionnaire into our supplier assessment and on-boarding process. Phase 3 is monitoring, reporting and continuous improvement.

5 Training and capability building

5.1 ESG risk training

In 2025, we launched our new ESG Risk Assessment Training Portal and Knowledge Centre. This knowledge center aims to train and equip our front office and risk colleagues on understanding ING's ESG risk framework, policies and governance, and providing practical guidance and instructions tailored to sectors and the ESG Risk assessment process. The ING Group Environmental and Social Risk team also provided training to internal staff on the ESG Risk Framework and the application of the Equator Principles. Training in 2025 targeted the teams working in sustainable finance, lending, and compliance.

5.2 Compliance training

In 2025, ING launched a new global mandatory training on the Global Code of Conduct. New joiners are expected to undertake the training upon joining ING. At the conclusion of the e-learning module, employees are required to acknowledge their understanding of and commitment to complying with the Global Code of Conduct, which is actively monitored.

There is also a global mandatory training on reporting concerns for new joiners to educate them on the whistleblower channel, anonymity and confidentiality, their rights and responsibilities as reporters, the importance of awareness on retaliation, and how follow-up is handled. We actively monitor the timely completion of the training. For Whistleblower Reporting Officers, being the global support community, a specialist learning journey provides a one-stop resource for mandatory obligations, investigative interviewing, guidance, and templates.

6 Assessing the effectiveness of our actions

We recognise the importance of continuous improvement in the way we assess and address modern slavery risks in our operations and supply chains. While most the goals that we have set in the previous year continue to be ongoing actions, we have provided an update in this statement, where applicable, such as the new ESG questionnaire we launched in 2025 for our supplier tenders, the new ESG Risk Assessment Training Portal and Knowledge Centre. To this end, we continue to assess the effectiveness our approach against our goals and inform our path forward.

	Goals to improve the effectiveness of our actions	Status
a	Continue to enhance our internal tooling and processes for ESG risk assessments	Ongoing
b	Continue to review the results from the Australian modern slavery questionnaire and other modern slavery risk ratings provided in respect of suppliers	Ongoing
c	Continue to review questionnaires for suppliers to fine tune it to ensure that the questions are fit for purpose	Ongoing
d	Continue to participate in industry groups to continue the dialogue in relation to human rights, which may include modern slavery, such as the Shift FI Circle	Ongoing
e	Continue to have dialogues with Civil Society Organisations on potential human rights issues that may arise from our wholesale banking operations	Ongoing

7 Consultation and approval

This document contains general statements about ING's sustainability approach. The approach and criteria referred to in this document are intended to be applied in accordance with applicable law. Due to the fact that there may be different or even conflicting laws, the approach, criteria or the application thereof, could be different across jurisdictions.

This statement was prepared in consultation with ING Bank N.V., London Branch, and ING Bank (Australia) Ltd. During the preparation process, we have consulted relevant functions and departments across the ING Reporting Entities listed in Appendix I. As part of the preparation of this statement, the ING Reporting Entities consulted relevant specialists within their respective entities. To get the input and feedback regarding relevant other parts of ING Group, the ING Reporting Entities consulted specialists that have responsibility for their respective areas on an ING Group level including, but not limited to: Group Procurement, Group Legal, Group Compliance, Group Financial Crime Compliance, Environmental and Social Risk Management, and Group Environmental, Social & Governance Risk. The individuals consulted have responsibility for their respective areas on an ING Group level and provided input in relation to each of the Reporting Entities and their owned and controlled entities.

This statement has been approved by the Board of Directors of ING Bank N.V., being the Management Board Banking, on 1st June 2026 and by the Board of Directors of ING Bank (Australia) Limited on its behalf, IDOL Trust 2025-1, IDOL R Trust, IDOL Trust 2024-1, IDOL Trust 2023-1, IDOL Trust 2019-1 and IBAL Covered Bond Trust as a higher entity on 6th May 2026, in accordance with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.



CEO and Director of ING Bank (Australia) Limited

Name: Melanie Evans

Dated: 09/06/2026



CFO and Director of ING Bank N.V.

Name: Ida Lerner

Dated: 10/06/2026

Appendix I – Reporting entities

Reporting entities		Principal activities	Australia Act	UK Act
1	ING Bank N.V.	ING Bank N.V. is the principal banking entity within ING and the parent company of various banks, other subsidiaries, branches and representative offices globally.	Yes	Yes
2	ING Services Limited	ING Services Limited is the employment company for staff working for the London branch of ING Bank N.V.	No	Yes
3	ING Bank (Australia) Ltd (ACN 000 893 292) ("IBAL")	ING in Australia operates through its locally incorporated subsidiary, IBAL. Each of IBAL and ING Bank N.V. holds an Australian banking licence and Australian Financial Services Licence, and IBAL also holds an Australian Credit Licence.	Yes	No
4	IDOL 2025-1 Trust ABN 43 353 069 325 ("IDOL Trust 2025-1")	The IDOL Trust 2025-1 was established on 18 September 2025 by the Trust Creation Notice dated 18 September 2025 between the Manager and the Trustee, Perpetual Corporate Trust Limited, for the purpose of purchasing loans from IBAL and issuing securities as part of the funding activities of IBAL.	Yes	No
5	IDOL R Trusts ABN 59 505 950 174 ("IDOL R Trust")	The IDOL R Trust was established on 30 October 2024 by the Trust Creation Notice dated 30 October 2024 between the Manager and the Trustee, BNY Trust Company of Australia Limited, for the purpose of purchasing loans from IBAL and issuing securities as part of the funding activities of IBAL.	Yes	No
6	IDOL 2024-1 Trust ABN 68 980 431 464 ("IDOL Trust 2024-1")	The IDOL Trust 2024-1 was established on 7 March 2024 by the Trust Creation Notice dated 7 March 2024 between the Manager and the Trustee, Perpetual Corporate Trust Limited, for the purpose of purchasing loans from IBAL and issuing securities as part of the funding activities of IBAL.	Yes	No
7	IDOL 2023-1 Trust ABN 82 957 428 218 ("IDOL Trust 2023-1")	The IDOL Trust 2023-1 was established on 22 June 2023 by the Trust Creation Notice dated 22 June 2023 between the Manager and the Trustee, Perpetual Corporate Trust Limited, for the purpose of purchasing loans from IBAL and issuing securities as part of the funding activities of IBAL.	Yes	No
8	IDOL 2019-1 Trust ABN 51 354 354 354 ("IDOL Trust 2019-1")	The IDOL Trust 2019-1 was established on 1 November 2019 by the Trust Creation Notice dated 1 November 2019 between the Manager and the Trustee, Perpetual Corporate Trust Limited, for the purpose of purchasing loans from IBAL and issuing securities as part of the funding activities of IBAL.	Yes	No
9	IBAL Covered Bond Trust ABN 25 870 839 351 ("IBAL Covered Bond Trust")	The principal activities of IBAL Covered Bond Trust include the management and maintenance of the cover pool, monitoring the credit quality of the underlying assets, and ensuring that the cover pool remains sufficient to always meet the obligations to bondholders. The Trust has a pool of economic assets available in providing guarantees and security, including mortgage loan rights, and cash and cash equivalent. These economic assets support a guarantee provided by the Trust to the Trustee associated with the issue of covered bonds by the Bank.	Yes	No

Appendix II – Page reference

Modern Slavery Statement content		Page reference
a	Identify the reporting entity	Page 2, 12
b	Describe the reporting entity's structure, operations and supply chains	Page 3
c	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 3-4
d	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Page 5-10
e	Describe how the reporting entity assesses the effectiveness of these actions	Page 10
f	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	Page 11
g	Any other information that the reporting entity, or the entity giving the statement, considers relevant	Page 12