

To the members of the ESG-Committee of ING Groep N.V.'s Supervisory Board

Mr. Hans Wijers

Ms. Mariana Gheorghe

Mr. Lodewijk Hijmans van den Bergh

Mr. Herman Hulst

**c/o ING Groep NV**

**Bijlmerdreef 106**

**1102 CT Amsterdam**

20 March 2023

**RE: Request to act in line with ING Groep NV's claimed social principles**

Dear Madams and Sirs,

The **European Funds Recovery Initiative (EFRI)** is a not-for-profit victim protection organization in line with Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 ("Victim Protection Directive").

Our organization supports cybercrime victims to recover their lost funds and coordinate damage claims against online fraud scammers and their financial service enablers. Moreover, and maybe even more important, we support the desperate victims in handling their mental issues resulting from the fraud.

Online fraud scammers are ripping off tens of thousands of European consumers daily and are now a serious threat to society. The scammers leave their victims financially and mentally distressed.

Unfortunately, PAYVISION BV, part of ING Groep NV, was one of the significant financial crime enablers for these online fraud scams during the years 2013 up to at least April 2020. We trust you are aware of the devastating audit report of DNB (De Nederlandsche Bank) about the willful blindness approach applied by the management of PAYVISION over the years and the ongoing criminal proceedings.

From reading ING Groep NV's annual report 2022, published on March 9, 2023, we got the impression that ING Groep NV is aware of the pressing cybercrime issue. The report talks a lot about social

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**Non-governmental organization to combat cybercrime, ZVR 1493630560, Vienna, Austria**  
**[www.efri.io](http://www.efri.io), email : [office@efri.io](mailto:office@efri.io)**

responsibility (compare the section: STAYING SAFE AND SECURE) and about the essential role of the financial industry as a gatekeeper to protect society against financial crime. ING also reports on the importance of *TRUST* as starting point, as the most basic requirement, for all stakeholders. ING elaborates that projects and companies ING is financing are checked for social risks to steer clear of activities in specific sectors or industries that could be harmful to people.

Furthermore, we learned from the ING annual report that in the second quarter of 2022, it was decided to stress the importance ING Groep NV puts on adherence to ESG principles.

So, ING Groep NV's supervisory set up a dedicated ESG Committee. The ESG Committee is to enforce the commitment to continue working with the EB and the MBB (Executive Board and Managing Banking Board) on further embedding environmental, social, and governance (ESG) principles into ING's Internal processes and business activities. The ESG Committee is also to assist with overseeing ESG-related topics.

We welcome the establishment of this new ESG Committee set up explicitly and use the opportunity to ask for your support:

Out of the more than 1.300 victims registered with EFRI, more than 300 have been victimized by transnational cybercriminal organizations facilitated by PAYVISION BV. We have been trying to find a settlement with Payvision and ING Groep NV for three years.

Some victims' financial and mental situations become horrible within these three years. Two of the victims we worked with died: One committed suicide. He was an 84-year-old German guy who had worked his whole life, raised a family, paid his taxes duly, and never had any troubles with European authorities. PAYVISION BV facilitated these scams and processed much of the stolen money.

Another victim – also represented by *EFRI* – was a 58-year-old lady; she was Swiss and spent her working life in South Africa – her life savings were meant to enable her and her family a good retirement back in Switzerland. She transferred quite a part of their life savings via an ING Groep NV Bank account to the scammers. She was a lovely lady and told us several times that she would write a book about what happened to her. Due to all this distress, she got brain cancer and died only a few months ago.

Until now, no constructive handling of the refund matter has occurred. PAYVISION BV concentrated on denying the allegations for years, blaming the victims, and defaming our organization. It is about time for ING Groep NV to address this issue adequately.

We hope this open issue is one of the ESG-related matters that the ESG committee should take care of.

Best Regards

Elfriede Sixt