

GRI G4 table

Van Lanschot 2015 annual report

General Standard Disclosures				
GRI4 Code	Disclosure	Reference: AR, S(uppement) or W(eb site)	Omissions (+ reasons if applicable)	UN Global Compact
Strategy and analysis				
G4-1	Statement from the most senior decisionmaker of the organisation about the relevance of sustainability to the organisation and the organisation's strategy	AR: pp. 7-8 (Chairman's message)	No omissions	
G4-2	A description of key impacts, risks, and opportunities	AR: p. 11 (SWOT analysis), pp. 14-15 (How we create value) S: pp. 2-3 (CSR framework) W: corporate.vanlanschot.nl/responsible/policy	No omissions	
Organisation profile				
G4-3	Name of the organisation	AR and S: title page, credits on final page	No omissions	
G4-4	Primary brands, products and services	AR: p. 10 (Profile), p. 15 (Value creation model), pp. 210-215 (Segment information)	No omissions	
G4-5	Location of the organisation's headquarters	AR and S: credits on final page	No omissions	
G4-6	Number of countries where the organisation operates (including names)	AR: p. 10 (Profile), p. 215 (Country by country reporting)	No omissions	
G4-7	Nature of ownership and legal form	AR: p. 63 (Corporate governance) and p. 79 (Van Lanschot shares)	No omissions	
G4-8	Markets served (including geographic breakdown, sectors served, and types of customers)	AR: p. 10 (Profile), p. 15 (Value creation model), pp. 30-46 (Private Banking, Asset Management, Merchant Banking, Van Lanschot Participaties and Corporate Banking), pp. 210-215 (Segment information)	No omissions	
G4-9	Scale of the organisation including: <ul style="list-style-type: none"> - Total number of employees - Total number of operations - Net sales or revenues - Total capitalisation broken down in terms of debt and equity - Quantity of products or services provided 	AR: p. 6 (Key data), p. 10 (Profile)	No omissions	
G4-10	Employees: <ul style="list-style-type: none"> - Total number of employees by employment contract and gender - Total number of permanent employees by employment type and gender - Total workforce by employees and supervised workers and by gender - Total workforce by region and gender - Percentage of self-employed and contract workers - Any significant variations in employment numbers (e.g. seasonal workers) 	AR: pp. 48-49 (The people behind Van Lanschot and Kempen) S: p. 10 (Our employees). Not reported: breakdown by job types, managers/employees and significant variation in employment numbers. Percentage of self-employed and contract workers: 194 external staff vs 1,666 internal in FTEs (11.6%)	Not fully reported	Principle 4
G4-11	Total percentage of employees covered by collective bargaining agreements	In the Netherlands 80% of employees are covered by the Van Lanschot employment conditions; others have position-based contracts.	No omissions	Principle 3
G4-12	Description of organisation's supply chain	AR: pp. 14-15 (How we create value)	No omissions	All 10 principles
G4-13	Significant changes during the reporting period regarding the organisation's size, structure, ownership, or its supply chain (including changes in location or operations, including facility openings, closings, and expansions; changes in the share capital structure and other capital formation, maintenance, and alteration operations; changes in the location of suppliers, the structure of the supply chain, or in relationships with suppliers, including selection and termination)	AR: pp. 12, 35 (Acquisition of MN UK's fiduciary activities)	No omissions	Principles 7, 8

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G4-14	Notes on application of precautionary principle	AR: pp. 7-8 (Chairman's message), p. 9 (Strategy), pp. 14-15 (How we create value), pp. 16-18 (What our stakeholders expect), pp. 50-57 (Risk and capital management) and p. 69 (management and control system) S: pp. 2-3 (CSR framework)	No omissions	
G4-15	Externally developed economic, environmental and social charters, principles, or other initiatives to which the organisation subscribes or which it endorses	AR: p. 14 (IIRC and GRI), p. 18 (GRI), p. 36 (UN Global Compact and PRI) S: pp. 4-5 (Dilemmas), pp. 11-12 (Greenhouse Gas Protocol and CDP), p. 11 (Sustainability Manifesto) W: corporate.vanlanschot.nl/responsible/policy (memberships)	No omissions	
G4-16	List memberships of associations (such as industry associations) and/or national or international advocacy organisations in which the organisation holds a position on the governance body; participates in projects or committees; provides substantive funding beyond routine membership dues; views membership as strategic	W: corporate.vanlanschot.nl/responsible/policy (memberships)	No omissions	
Identified material aspects and boundaries				
G4-17	List of all entities included in the organisation's consolidated financial statements, noting any entity included in the organisation's consolidated financial statements not covered by its CSR report	AR: p. 10 (Profile) S: p. 17 (scope)	No omissions	
G4-18	Explain the process for defining the report content and aspect boundaries, plus how the organisation has implemented the Reporting Principles for Defining Report Content.	S: pp. 17-19 (Reporting principles).	No omissions	
G4-19	List of all material aspects identified in the process for defining report content	AR: pp. 16-18 (What our stakeholders expect) S: pp. 17-19 (Reporting principles; Determining GRI aspects)	No omissions	
G4-20	For each material aspect, report the aspect boundary within the organisation, as follows: <ul style="list-style-type: none"> – Report whether the aspect is material within the organisation. – If the aspect is not material for all entities within the organisation, for which entities is it (or is it not)? – Report any specific limitation regarding the aspect boundary within the organisation. 	Our materiality analysis showed that our internal and external stakeholders report virtually no differences in terms of the topics they rate as material to them and to Van Lanschot; see AR p. 16 (materiality matrix): nearly all topics are on or close to the diagonal, demonstrating that all listed aspects are material both within and outside Van Lanschot.	No omissions	
G4-21	For each material aspect, report the aspect boundary outside the organisation, as follows: <ul style="list-style-type: none"> – Report whether the aspect is material outside of the organisation. – If the aspect is material outside of the organisation, identify the entities, groups of entities or elements for which the aspect is material, and also indicate the geographical location. – Report any specific limitation regarding the aspect boundary outside the organisation. 	See reference at G4-20.	No omissions	
G4-22	Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements.	S: pp. 17-19 (Reporting principles; Comparability)	No omissions	
G4-23	Report significant changes from previous reporting periods in the scope and aspect boundaries.	S: pp. 17-19 (Reporting principles; Comparability; Determining GRI aspects)	No omissions	

General Standard Disclosures				
GRI4 Code	Disclosure	Reference: AR, S(upplement) or W(website)	Omissions (+ reasons if applicable)	UN Global Compact
Stakeholder engagement				
G4-24	List of stakeholder groups engaged by the organisation	AR: pp. 16-18 (What our stakeholders expect) S: pp. 4-7 (Stakeholder dialogue) and pp. 17-19 (Reporting principles)	No omissions	
G4-25	The basis for identification and selection of stakeholders with whom to engage	AR: pp. 16-18 (What our stakeholders expect) S: pp. 4-7 (Stakeholder dialogue) and pp. 17-19 (Reporting principles)	No omissions	
G4-26	Approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process	S: pp. 4-7 (Stakeholder dialogue)	No omissions	
G4-27	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. Report the stakeholder groups that raised each of the key topics and concerns.	S: pp. 4-7 (Stakeholder dialogue)	No omissions	
Report profile				
G4-28	Reporting period for information provided	AR: title page S: title page, pp. 17-19 (Reporting principles; Reporting period)	No omissions	
G4-29	Date of most recent previous report	AR: credits on final page. On 18 March 2016, AR and S were published simultaneously on the Van Lanschot website (www.corporate.vanlanschot.nl), together with the GRI4 table. Their English translations were released on 19 April 2016.	No omissions	
G4-30	Reporting cycle (such as annual, biennial)	AR and S: annually	No omissions	
G4-31	Contact point for questions regarding the report or its contents	AR and S: credits on final page	No omissions	
G4-32	Choice of 'in accordance' option (core or comprehensive) <ul style="list-style-type: none"> - Report the GRI Content Index for the chosen option; and - Include reference to the External Assurance Report, if the report has been externally assured. 	Van Lanschot has complied with GRI4 Comprehensive; its GRI4 table was published on its website as a supplement to its 2015 AR 2015. External assurance by EY was sought for both the 2015 supplement and the GRI4 table. For the external assurance report, see AR pp. 226-227.	No omissions	
G4-33	Policy and current practice with regard to seeking external assurance for the report	AR: pp. 226-227 (Independent auditor's assurance report) S: p. 19 (Verification)	No omissions	
Governance				
G4-34	Governance structure of the organisation, including committees of the highest governance body. Identify any committees responsible for decision-making on economic, environmental and social impacts.	AR: pp. 58-61 (Report of the Supervisory Board) and pp. 63-70 (Corporate governance) W: corporate.vanlanschot.nl/responsible/policy	No omissions	
G4-35	Process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees	AR: pp. 63-70 (Corporate governance) W: corporate.vanlanschot.nl/responsible/policy	No omissions	
G4-36	Report whether the organisation has appointed an executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body.	Responsibility for economic, environmental and social topics lies with the Statutory Board. W: corporate.vanlanschot.nl/responsible/policy	No omissions	

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G4-37	Report processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body.	Van Lanschot is in constant touch with its stakeholders, with both Supervisory and Statutory Boards coming into play. Members of the Statutory Board regularly speak to clients (as 'executive involved'), shareholders, rating agencies and regulators, attend stakeholder meetings with multiple groups of stakeholders, confer with the Works Council and are kept informed by internal employee engagement surveys. Where so desired/needed the outcomes of these stakeholder meetings are shared with the Supervisory Board. And it isn't just the Statutory Board that engages with stakeholders; the Supervisory Board also meets shareholders - at the General Meeting, for instance - as well as regulators, (senior) staff, the Works Council and external auditors. S: pp. 4-7 (Stakeholder dialogue) W: corporate.vanlanschot.nl/responsible/policy	No omissions	
G4-38	Composition of the highest governance body and its committees by: <ul style="list-style-type: none"> - Executive/non-executive - Independence - Tenure on the governance body - Number of each individual's other significant positions and commitments, and the nature of the commitments - Gender - Diversity (under-represented social groups) - Competences relating to economic, environmental and social impact - Stakeholder representation 	AR: pp. 77-78 (Personal details of members of the Supervisory Board) W: corporate.vanlanschot.nl/management-supervision Not explicitly included: 1) diversity (any under-represented groups on behalf of whom Supervisory Board members were appointed) and 2) competences relating to economic, environmental and social impact. Note on 1) This does not apply to Van Lanschot. Note on 2) As our public profiles for Supervisory Board members show (Van Lanschot website), we aim for these competences to be represented on the Supervisory Board, as embodied by the various members.	Not included: <ul style="list-style-type: none"> - Diversity - Competences 	Principle 6
G4-39	Report whether the chair of the highest governance body is also an executive officer (and, if so, his or her function within the organisation's management and the reasons for this arrangement).	See AR, p. 63: Van Lanschot has a two-tier board, with, as its name suggests, the Supervisory Board supervising.	No omissions	
G4-40	Nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members, including: <ul style="list-style-type: none"> - Whether and how diversity is considered - Whether and how independence is considered - Whether and how expertise and experience relating to economic, environmental and social topics are considered - Whether and how stakeholders (including shareholders) are involved 	W: corporate.vanlanschot.nl/management-supervision In keeping with the Dutch corporate governance code, Van Lanschot has drafted a policy for the recruitment and selection of policymakers (in Dutch only), and we also refer to the by-laws of the Supervisory Board as well as its public profile, which show that these criteria inform the selection of Supervisory Board members.	No omissions	
G4-41	Processes for the highest governance body to ensure conflicts of interest are avoided and managed. Report whether conflicts of interest are disclosed to stakeholders, including: <ul style="list-style-type: none"> - Cross-board membership - Cross-shareholding with suppliers and other stakeholders - Existence of controlling shareholder - Related party disclosures 	We have a range of processes in place to help prevent conflicts of interests, in line with the law (including the Management and Supervision Act) and the Dutch corporate governance code. Please refer to the by-laws of the Supervisory and Statutory Boards on our website and to our annual report (Report of the Supervisory Board, pp. 58-61).	No omissions	
G4-42	Highest governance body's and senior executives' roles in the development, approval, and updating of the organisation's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts	Please refer to the by-laws of the Supervisory and Statutory Boards on our website. The Supervisory Board has a more remote role on economic, environmental and social matters (see G4-35).	No omissions	

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G4-43	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics	AR: p. 60 (Report of the Supervisory Board). As part of its continuing education programme, the Supervisory Board annually covers a range of topics; sessions in 2015 focused on operational risk management, interest rate risk and pension trends. Please refer to the by-laws of the Supervisory Board on our website and to our annual report (Report of the Supervisory Board).	No omissions	
G4-44	Processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics. Report whether such evaluation is independent or not, and its frequency, and whether such evaluation is a self-assessment. Also report actions taken in response to evaluation.	Please refer to the by-laws of the Supervisory Board on our website and to our annual report, p. 60. Performance is reviewed annually and independent outside assistance sought every three years. Economic, environmental and social performance will also be included where relevant.	No omissions	
G4-45	The highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body's role in the implementation of due diligence processes.	Identifying and managing these types of opportunities and risks is the domain of the Statutory Board, as is due diligence (see G4-35).	No omissions	
G4-46	The highest governance body's role in reviewing the effectiveness of the organisation's risk management processes for economic, environmental and social topics	Every year, the Supervisory Board's Risk Committee reviews our responsible lending policy. In 2015 the Supervisory Board also discussed our diversity policies and progress in corporate social responsibility and responsible investment (see AR, p. 59).	No omissions	
G4-47	Frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities	The Supervisory Board will undertake such a review at least once a year, when assessing our annual report and CSR supplement, but may do so more often if appropriate.	No omissions	
G4-48	The highest committee or position that formally reviews and approves the organisation's sustainability report and ensures that all material aspects are covered	Supervisory and Statutory Boards review the draft annual report and CSR supplement; the Statutory Board signs off on them.	No omissions	
G4-49	Report the process for communicating critical concerns to the highest governance body.	Critical concerns may be voiced by way of a range of channels, e.g. stakeholder dialogue, General Meeting, media, CSR department, etc.	No omissions	
G4-50	Report the nature and total number of critical concerns that were communicated to the highest governance body and the mechanism(s) used to address and resolve them.	No records are kept of the number and nature of such concerns, as these hardly arise in practice.	Not available	
G4-51	Report the remuneration policies for the highest governance body and senior executives for the below types of remuneration: <ul style="list-style-type: none"> – Fixed pay and variable pay (performance-based, equity-based, bonuses, deferred shares) – Sign-on bonuses or recruitment incentive payments – Termination payments – Clawbacks – Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees. Also report how performance criteria in the remuneration policy relate to the highest governance body's and senior executives' economic, environmental and social objectives.	AR: p. 60 (Remuneration Committee) and pp. 71-74 (Remuneration) W: corporate.vanlanschot.nl/remunerationpolicies	No omissions	

General Standard Disclosures				
GRI4 Code	Disclosure	Reference: AR, S(upplement) or W(website)	Omissions (+ reasons if applicable)	UN Global Compact
G4-52	Report the process for determining remuneration. Report whether remuneration consultants are involved in determining remuneration and whether they are independent of management. Report any other relationships which the remuneration consultants have with the organisation.	AR: pp. 63-70 (Corporate governance), pp. 71-74 (Remuneration) W: corporate.vanlanschot.nl/remunerationpolicy	No omissions	
G4-53	Report how stakeholders' views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and proposals, if applicable.	Stakeholder views on our remuneration policy come up in the stakeholder dialogue, and remuneration votes are taken at the General Meeting.	No omissions	
G4-54	Report the ratio of the annual total compensation for the organisation's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.	This ratio worked out at 15.5 in 2015 (Van Lanschot Nederland including Kempen) and reflects both fixed pay - defined as full-time salary, holiday allowance, the so-called 13th month payment and, at Kempen, the market-related allowance - and variable pay. Variable remuneration is defined as discretionary payments and the tax value of shares vesting in 2015 and included in payroll tax.	No omissions	
G4-55	Report the ratio of percentage increase in annual total compensation for the organisation's highest-paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) in the same country.	Percentage growth of total annual pay of highest-paid individual in 2015: 13.8%. Median percentage increase in total annual compensation for all employees (excluding the highest-paid individual) in 2015: 4.1%.	No omissions	
Ethics and integrity				
G4-56	Description of values, principles, standards and norms of behaviour such as codes of conduct and codes of ethics	W: corporate.vanlanschot.nl/en/governance	No omissions	
G4-57	Report the internal and external mechanisms for seeking advice on ethical and lawful behaviour, and matters related to organisational integrity, such as helplines or advice lines.	Employees have various avenues open to them, e.g. their managers, the Legal, Compliance and/or CSR departments, and our Ethical and ESG Councils. Van Lanschot has a whistleblower policy in place and has appointed a confidential adviser employees may turn to.	No omissions	
G4-58	Report the internal and external mechanisms for reporting concerns about unethical or unlawful behaviour, and matters related to organisational integrity, such as escalation through line management, whistleblowing mechanisms and hotlines.	W: corporate.vanlanschot.nl/en/governance	No omissions	

Specific Standard Disclosures					
Material issues (number in materiality matrix)	GRI Aspect	GRI Indicators	DMA*	Omissions	UN Global Compact
Financial management (1) Strategy and CSR (3) Responsible products and services (23) Consumer service and complaints (24)	1. Economic performance	G4-EC 1 G4-EC 2 G4-EC 3 G4-EC 4	See following pages	No omissions	
Social and community investment (27) Social engagement (28)	2. Indirect economic impacts	G4-EC 7 G4-EC 8	See following pages	No omissions	
Management of clients' money (4) Financial and economic crime (18) Fair marketing, information and contracts (22) Responsible products and services (23)	3. Compliance	G4-SO 8	See following pages	No omissions	
Management of clients' money (4) Fair marketing, information and contracts (22) Responsible products and services (23)	4. Product and services labelling	G4-PR 3 G4-PR 4 G4-PR 5	See following pages	G4-PR 3	
Privacy (25)	5. Customer privacy	G4-PR 8	See following pages	No omissions	
Employee development (13)	6. Training and education	G4-LA 9 G4-LA 10 G4-LA 11	See following pages	G4-LA 9	Principle 6
Management of clients' money (4) Responsible products and services (23)	7. Product portfolio	FS 6 FS 7 FS 8	See following pages	FS 7 FS 8	
X	8. Audit	-	See following pages	No omissions	
Management of clients' money (4) Responsible products and services (23)	9. Active ownership	FS 10 FS 11	See following pages	No omissions	

Other material issues (ISO 26000)	Reference
Decision-making/stakeholders (2) External communication (5) Bonuses (10)	AR: pp. 16-18 (What our stakeholders expect) S: pp. 4-7 (Stakeholders). Complete 2015 annual report (including CSR supplement) and the Van Lanschot and Kempen websites AR: pp. 71-74 (Remuneration) W: corporate.vanlanschot.nl/remunerationpolicies

* DMA (Disclosures on management approach) describes how the GRI Aspect is managed.

Management approach	
GRI Aspect	Notes
1. Economic performance	<p>a. Why is this Aspect material? Our economic performance is extremely important to (most of) our stakeholders. Our clients need a financially healthy financial services provider able to meet its obligations; they should be able to count on their savings and investments being safe with us. Our shareholders benefit from robust financial results; they're looking for profits, dividend payments and positive share price trends, while our employees want our bank to be financially robust for reasons of job security, personal income and development opportunities. Lastly, governments, regulators and society at large benefit from a financially healthy bank; failing banks may cause countless ills, including declining economic growth, social unrest and state aid.</p>
	<p>b. How does Van Lanschot manage this Aspect or its impact? Van Lanschot manages this Aspect by consistently implementing its strategy of focus, simplification and growth. – We choose to position ourselves as a specialist, independent wealth manager as we strongly believe that wealth management offers attractive growth opportunities and enables us to distinguish ourselves from our peers in our markets. An ageing population, high level of prosperity, capital surplus and a low rate of economic growth generate strong demand for wealth management in the Netherlands. We are building on two strong brands – Van Lanschot and Kempen & Co – and our experience in our three core activities Private Banking, Asset Management and Merchant Banking. – Drawing on our multi-year forecasts, we have set 2017 financial targets for our Common Equity Tier I ratio, return on Common Equity Tier I capital and efficiency ratio. – Our annual budget cycle sees us set the annual targets for all Van Lanschot departments. These budgets are devised bottom-up, with the input of the businesses challenged and where necessary made more rigorous in sessions with the Statutory Board. Target achievement is measured monthly and reported to the Statutory Board using management reports – including KPI dashboards – and analyses of financial and non-financial data and trends.</p> <p>Additional information For our answer to the sector supplement question on Van Lanschot's community investment strategy, see notes to Aspect 2, 'Indirect economic impacts'.</p>
	<p>c. How does Van Lanschot evaluate the management approach? Multi-year forecasts are regularly recalibrated and measures taken in the event of deviations. Annual targets are measured every month and changes made in the event of interim deviations.</p>
2. Indirect economic impacts	<p>a. Why is this Aspect material? In addition to direct economic impacts (see Aspect 1 above) our indirect economic performance matters to many of our stakeholders. This we realise by way of sponsorships, donations, giving back by our employees and our Charity Service. Commitment is one of Van Lanschot's core values and we are committed to contributing to the world around us. Van Lanschot does not have any investment products directly targeting the disadvantaged – such as microfinance and other types of inclusion – but we are looking into ways in which we can meet today's increasing demand for impact investing, both from our own clients and from a growing group of civil society organisations and social entrepreneurs. We expect to develop this in more detail in 2016.</p>
	<p>b. How does Van Lanschot manage this Aspect or its impact? We make a clear distinction between sponsorship and donations. Unlike sponsorship, we do not expect to receive anything in return when donating. Our sponsorship policies are set periodically by the Statutory Board and implemented by the Marketing department. Van Lanschot's donation policies are centrally informed by our community programme under the name of 'The Next Generation' and are coordinated by our CSR department. At group level we have a Charity Committee, which donates – on behalf of Van Lanschot – to causes our employees volunteer for, also in their personal time. In 2015 we entered into a partnership with Ashoka, with the aim of supporting social entrepreneurs. Lastly, our Charity Service actively advises clients on charitable giving. In addition to these group-wide activities, many local Van Lanschot branches actively engage in sponsorships and donations, while Kempen & Co has its own sponsorship and donation policies. For more information, see our annual report on pp. 32, 43 (Sponsorship), p. 31 (Charity Service), p. 33 (Ashoka) and our CSR supplement on p. 16 (Social engagement).</p>
	<p>c. How does Van Lanschot evaluate the management approach? We periodically evaluate our group-wide sponsorship and donation programmes through discussions with civil society organisations as well as with the Statutory Board. Sponsorship evaluations drill deeper than those for donations. Van Lanschot does not report how much it spends annually on sponsorships and donations – in employee time and in money – primarily because the benefits of keeping such records do not make up for the costs.</p>

Management approach	
GRI Aspect	Notes
3. Compliance	<p>a. Why is this Aspect material? Laws and regulations reflect a society's general standards and values. Anyone wishing to be accepted and trusted in a community will have to at least abide by these laws and regulations. The very essence of a bank makes it a community organisation and it has no licence to operate without its community's acceptance and trust. And so it is only logical that Van Lanschot will always abide by relevant laws and regulations even while it is growing increasingly complex and changing ever more rapidly.</p>
	<p>b. How does Van Lanschot manage this Aspect or its impact? Trust in financial services companies has been very slow to recover, and it is partly for this reason that lawmakers frequently opt for a rule-based rather than a principles-based approach. These rule-based laws aim to strengthen the financial system, increase transparency and offer greater protection to clients. Our compliance function should ensure a sustainable and robust framework as well as a systematic approach to implementing these laws and rules in practice. We have devoted a lot of time to compliance with laws and regulations in the past couple of years and are now generally compliant with the rules and laws that apply to us. In fact, Van Lanschot more than ever has to actually prove that it is compliant.</p> <p>'Comply plain and simple' is how we run our compliance at Van Lanschot, meaning that the Compliance department translates the key legal and regulatory requirements into unambiguous, effective and efficient requirements for processes, procedures and employee actions.</p> <p>The Statutory Board is responsible for the design, effectiveness and execution of policies to address Van Lanschot's compliance risks and has set up a Compliance Committee for exactly this purpose. Members of the committee include the Chairman of the Statutory Board, the member of the Statutory Board responsible for Private Banking, as well as the heads of Compliance and Group Audit. The Compliance Committee determines policies to manage compliance risks – prompted by changes in relevant laws and regulations among other things, or changes at Van Lanschot itself – and is in charge of the annual review of these risks and policies. The Committee also decides on measures to manage compliance risks and defines compliance risk appetite.</p> <p>The Compliance department advises on the implementation of relevant law and regulations, and monitors compliance. It reports directly to the Chairman of the Statutory Board and also has reporting lines to the the chairman of the Audit and Compliance Committee and the Compliance Committee. Mission, objectives and scope (financial supervision laws) of the Compliance department are set down in the Compliance Charter.</p>
	<p>c. How does Van Lanschot evaluate the management approach? Van Lanschot periodically meets with regulators, for instance about the effectiveness of the management of compliance risks in the Van Lanschot organisation. This effectiveness also regularly features on the agendas of the Compliance Committee, the Statutory Board and the Audit and Compliance Committee. Group Audit regularly reviews the design, presence and operation of this Aspect's management.</p>
4. Product and services labelling	<p>a. Why is this Aspect material? To offer its clients maximum added value, Van Lanschot should only offer financial products and services that our clients really need. In addition, these products need to be easy to understand – i.e. not unnecessarily complex – cost-efficient and responsible (safe) in all market circumstances. Products that do not meet these requirements are unacceptable to Van Lanschot, as they might damage both the bank and its stakeholders.</p>
	<p>b. How does Van Lanschot manage this Aspect or its impact? We apply an approval process for new products and services, the new product approval (NPA) procedure, and have put in place a product review procedure for existing products. A new product will not be launched if the NPA procedure finds it does not meet the criteria. Existing products are discontinued if they no longer comply. These decisions are the domain of the Product Board, in which members of the Statutory Board are also represented.</p> <p>And it is not just the product itself that is important; our people who provide advice also have a key part to play. They need to have the appropriate knowledge and expertise, and to always put their clients' interests first. In line with Van Lanschot's general code of conduct, this also implies that employees have to look beyond what clients want: if a product does not sit well with a client's objectives and risk appetite, it is up to employees to point this out clearly. Client-centricity is a standard regular element in the annual appraisals of all employees.</p> <p>Putting clients centre stage also means that we should prevent conflicts of interest, to which end Compliance has designed our policies to prevent such conflicts. These policies comprise a range of organisational measures and rules on conduct, and aim to ensure that Van Lanschot's interests and those of our clients do not get mixed up.</p> <p>Additional information As for the information requested in the sector supplement on financial education initiatives: there are various ways in which Van Lanschot tries to increase the financial knowledge of its clients and others, examples including our wealth planning service, which provides insight into clients' financial positions in the longer term; client presentations on financial topics (investment view meetings), and a range of research publications, updates and several research publications. Additionally, our social programme The Next Generation focuses on financial education and entrepreneurship, particularly for young people.</p>
	<p>c. How does Van Lanschot evaluate the management approach? These policies are reviewed periodically. Depending on the type of policy, reviews are carried out by the Product Board, the Statutory Board, the Compliance Committee or other committees created for this purpose. Group Audit also has a part to play: the Dutch Banking Code requires Van Lanschot to perform an annual audit of the effectiveness of our NPA and PR procedures. Effectiveness implies careful consideration of the risks and careful tests of other product aspects, such as our duty of care towards clients.</p>

Management approach	
GRI Aspect	Notes
5. Customer privacy	<p>a. Why is this Aspect material? Banking is all about trust. Our clients need to be able to trust that Van Lanschot handles their personal details safely, transparently and with integrity. Our clients also expect us not to use their personal details for purposes other than they provided them for.</p>
	<p>b. How does Van Lanschot manage this Aspect or its impact? Van Lanschot is subject to the Dutch Personal Data Protection Act, or WBP by its Dutch acronym, and endorses the code of conduct for processing personal data by financial institutions, which takes WBP a step further and takes account of the specific features of the financial sector. Van Lanschot applies these laws and regulations in its own policy on processing personal data, for which we have designed specific processes and procedures. We regularly pay attention to building and increasing employee awareness on this issue. To reflect the importance of this Aspect, Van Lanschot has appointed a Privacy Compliance Officer and created a framework for managing personal data protection. Reporting on this aspect is included in our compliance reports and is reviewed in the various committees discussed under Compliance (see Aspect 3).</p>
	<p>c. How does Van Lanschot evaluate the management approach? Group Audit regularly reviews the design, presence and operation of this Aspect's management.</p>
6. Education and training	<p>a. Why is this Aspect material? People make the difference in a knowledge and service-based organisation such as ours. Their professionalism, personalities, competences, expertise, values and integrity determine the quality of our service. If we are to achieve our ambitions, we will have to create the right conditions for our workforce to excel, and education and training are key. In addition, regulators demand specific levels of knowledge on the part of our staff. The Financial Supervision Act (Wft) stipulates that employees providing advice or information need to have specific knowledge about banking, consumer behaviour and ethics.</p>
	<p>b. How does Van Lanschot manage this Aspect or its impact? Our HR Development department offers a wide range of courses and training sessions under the umbrella of the Van Lanschot Academy. This is accessible to all Van Lanschot employees and provides an integrated educational programme matching Van Lanschot's strategy and presented in logical order. Together with their managers, employees can select the training courses that help them improve their knowledge and development, and employee education and development are a standard feature of the job appraisal system, e.g. planning, progress and appraisal meetings. A number of our employees, many of them at Private Banking, have to achieve minimum education requirements under the Financial Supervision Act, and these have been translated into study paths in the Private Banking e-learning platform. The platform helps both them and their managers to easily see what is expected of them and what knowledge and skills they have yet to attain or develop. Managers will receive periodic updates on their people's study progress. The study load for the Financial Supervision Act is quite demanding and Van Lanschot will help its people where it can.</p>
	<p>c. How does Van Lanschot evaluate the management approach ? Van Lanschot follows the changes and updates of lawmakers in the legally compulsory part of the Academy programme, and participates in interbank consultations on the subject. Education and exams are provided by a specialist external provider. In the section of the Academy programme that is not compulsory under Dutch law, Van Lanschot has a greater level of freedom and adopts a different approach. Both the courses on offer and the list of preferred suppliers are reviewed periodically to reflect the needs and requirements of our workforce. We also review which courses and suppliers are sought after and which less so, adjusting our existing offering where relevant.</p>

Management approach	
GRI Aspect	Notes
7. Product portfolio (see sector supplement)	<p>a. Why is this Aspect material?</p> <p>As a financial services provider Van Lanschot has an intermediary role. We attract financial resources from clients and other providers of capital and then lend them on. We do this both on- and off-balance sheet.</p> <ul style="list-style-type: none"> – In addition to savings and deposits, our balance sheet also includes debt capital through the issue of bonds. These funds are then provided to clients in the shape of loans – mainly mortgages and business loan facilities – and used in our own investment portfolio, where they are kept for liquidity purposes. – Off-balance sheet, Van Lanschot manages client investments. We typically invest these assets under management in our own investment funds, those of others, in individual companies and in government paper. <p>Both the owners of these client assets and Van Lanschot’s other stakeholders should be able to trust that we do not take our intermediary responsibilities lightly. This means, first of all, that we will check the origin of client assets entrusted to us, so as not to become party to money laundering or objectionable tax practices. Secondly, we need to ‘invest’ client assets responsibly, and borrowers will need to be assessed on corporate social responsibility both before they are granted loans and during the term of the facility. Likewise, Van Lanschot should screen investee companies, again both prior to and after investment.</p> <p>If we do not fulfil this intermediary role in a responsible manner, we run the risk of losing the trust of our stakeholders and run a reputation risk, which is why client acceptance policies, as well as responsible lending and investment policies, rank as material aspects.</p> <hr/> <p>b. How does Van Lanschot manage this Aspect or its impact?</p> <p>We have in place extensive policies to manage this Aspect and report on our management of it in our annual report – including CSR supplement – and on our website. A high-level summary of our policies is as follows:</p> <ul style="list-style-type: none"> – We investigate the origins of any financial resources we attract; this is a standard and key feature of our client acceptance policy (client due diligence). – Our responsible lending policy ensures that we screen existing and new business for sustainability. We will engage all borrowers falling short of our requirements and urge them to improve; this is done in-house by what we call a CSR filter. Companies involved in controversial weapons – e.g. cluster bombs – are not eligible for loans in any form. – Our own on-balance sheet investment portfolio is also screened for sustainability from time to time, using largely the same methodology as for our responsible lending policy. – Van Lanschot also observes a responsible investment policy for assets under management (off-balance sheet). We engage companies and fund managers that act contrary to pre-agreed conventions and treaties – on human rights, for instance, or labour conditions or the environment. Engagement is all about dialogue, of course, but we will not invest in companies involved in the production, sale or use of controversial weapons. <p>Van Lanschot’s employees are periodically informed about and/or trained in the application of these policies and any changes to them.</p> <hr/> <p>c. How does Van Lanschot evaluate the management approach?</p> <p>The above policies are periodically reviewed by internal committees set up for this purpose, e.g. the Compliance Committee for the client acceptance procedure. Responsible lending and responsible investing are the domain of the Credit Risk Policy Committee and the ESG Council respectively, while Forum Ethibel, an external independent not-for-profit association, annually tests these policies and their implementation. A Forum Ethibel certificate confirms that Van Lanschot has the described policies in place and applies them in practice.</p> <p>Periodically, we also sit down and review the substance and implementation of our policies with clients, civil society organisations, other banks and other stakeholders to gauge whether existing policies still match the expectations of such stakeholders. After careful consideration of all input and interests, we may change our current policies or come up with new ones.</p>

Management approach	
GRI Aspect	Notes
8. Audit (see sector supplement)	<p>a. Why is this Aspect material? Van Lanschot has an extensive policy in place that may be summarised as ‘corporate social responsibility means doing business honestly with respect for the world around us and with an eye to future generations’. Active and open dialogue with stakeholders (‘engagement’) is part and parcel of our policies, as is transparency about our objectives and outcomes. Our policies are set down in policy documents, work instructions and other reports that are periodically reviewed and updated where needed by various in-house committees, departments and staff.</p> <p>Van Lanschot is aware of the risks of CSR policies not being implemented or not correctly implemented. This concerns reputational risk mainly, as stakeholder trust in Van Lanschot would be damaged. These audits are material to Van Lanschot as this risk may be mitigated using internal controls and audits.</p> <hr/> <p>b. How does Van Lanschot manage this Aspect or its impact? Van Lanschot has chosen to embed CSR policies, their implementation and reporting in existing committees, departments, processes and systems as much as possible. This should help us identify early – and remedy promptly – any errors or inaccuracies in the implementation of or reporting about corporate social responsibility.</p> <p>Our policy choices also imply that CSR is safeguarded in various other processes and departments. Client acceptance, client-centricity and parts of our investment policy – on cluster munitions, for instance – are embedded in Compliance, while our responsible investment policy is integrated into KCM’s overall investment policy and our responsible lending policy has been incorporated into Van Lanschot’s general lending policies. In addition, our responsible lending policy is reviewed annually by the Risk Committee of the Supervisory Board. Lastly, much of the data for our annual report and CSR supplement is provided by departments and systems that are already part of a regular audit process. On top of this, Van Lanschot has hired external auditors: EY, which verifies our entire CSR annual report process plus the data we include; and research agency Forum Ethibel, which audits our responsible lending and investment policies.</p> <hr/> <p>c. How does Van Lanschot evaluate the management approach? Drawing on self-assessments among other factors, Group Audit periodically decides which businesses, departments or processes it will audit next, the main premise being that Group Audit focuses on the most material risks. To date, CSR has not been considered to be among Van Lanschot’s most material risks, partly because of the fact that this is also embedded in existing controls and audit processes. As a result, Group Audit and the Statutory Board have agreed not to expend any extra audit efforts on corporate social responsibility.</p>
9. Active ownership (see sector supplement)	<p>a. Why is this Aspect material? As asset managers, it is essential that we carefully manage client assets in our care (see also Aspect 7: Product portfolio) and our responsible investment policy reflects this. This policy is fleshed out and implemented by KCM, and features a long-term focus coupled with active ownership. What this means is that our investments are informed by the belief that a – partially – actively managed investment portfolio will add most value in the long term, in terms of both financial and non-financial – social, environmental and governance – returns. Underpinned by active ownership and proxy voting and on behalf of our investors, we engage in a dialogue with fund managers and investee companies about a range of social, environmental and governance themes, and exercise our votes at AGMs.</p> <hr/> <p>b. How does Van Lanschot manage this Aspect or its impact? For a description of our responsible investment policy, see Aspect 7 (Product portfolio). For a description of our voting policies as well as our voting records, go to KCM’s website at www.kempen.nl/asset_management.aspx?id=27962.</p> <hr/> <p>c. How does Van Lanschot evaluate the management approach? At Van Lanschot, the ESG Council is responsible for devising, implementing and reviewing our responsible investment policy (active ownership). To evaluate this policy, the ESG Council, which meets four times a year, uses information from a wide range of sources, such as general and individual client meetings, civil society organisations – e.g. Eumedion, VBDO, WNF, etc. – PRI, UN Global Compact, consultants and advisers – e.g. ECCE (the European Centre for Corporate Engagement), other banks and asset managers, etc. If these contacts suggest a necessity for policy changes, these will first be prepared in the Engagement Working Group (EWG) and subsequently approved by the ESG Council.</p>

Performance indicators (related to material Aspects)				
GRI4 Code	Disclosure	Reference: AR, S(uppement) or W(bsite)	Omissions (+ reasons if applicable)	UN Global Compact
G4-EC1	Direct economic value generated and distributed	AR: p. 23 (Staff costs), p. 24 (Income tax, Earnings per share), p. 28 (wealth growth for investor clients of PB and AM as a result of price effects) and p. 80 (dividend payments to shareholders)	No omissions	
G4-EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change	AR: p. 37 (climate change) S: pp. 11-15 (environmental management and purchasing) W: corporate.vanlanschot.nl/en/responsible/environment (measures focusing on lowering our carbon footprint)	No omissions	
G4-EC3	Coverage of the organisation's defined benefit plan obligations	See our pension fund's annual report (www.pensioenfondsvanlanschot.nl).	No omissions	
G4-EC4	Financial assistance received from government	Van Lanschot did not receive any financial assistance from government.	No omissions	
G4-EC7	Development and impact of infrastructure investments and services	AR: pp. 32, 43 (Sponsorship), p. 31 (Charity Service), p. 33 (Ashoka) S: p. 16 (Social engagement)	No omissions	
G4-EC8	Significant indirect economic impacts, including the extent of impacts	AR and S: Throughout both reports	No omissions	
G4-SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	No significant fines or sanctions were imposed on Van Lanschot in 2015 for non-compliance with laws and regulations.	No omissions	
G4-PR 3	Type of product and service information required by the organisation's procedures for product and service information, and percentage of significant product and service categories subject to such information requirements	Van Lanschot observes all laws and regulations, which leave little room for our own input or changes.	Niet relevant	
G4-PR 4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes	No such incidents occurred in 2015.	No omissions	
G4-PR 5	Results of surveys measuring customer satisfaction	AR: pp. 11, 15, 30, 38, 43 (Client satisfaction, Client loyalty, NPS score, Best Private Bank, Awards)	No omissions	
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	AR: p. 56 (Compliance risk). We have a system in place to record all complaints, including reporting any breaches of client privacy and leaks of client data. The system shows no complaints from clients and regulators on this particular issue.	No omissions	
G4-LA9	Average hours of training per year per employee by gender, and by employee category	S: p. 10 (Training hours). We report total and individual average hours of training per year, but do not break these figures down by gender and employee category, as we find such a breakdown insufficiently material.	Not fully reported	
G4-LA10	Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	AR: pp. 48-49 (The people behind Van Lanschot and Kempen). S: p. 10 (Our employees; Training and education).	No omissions	
G4-LA11	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category	AR: p. 49 (Assessing staff performance). All employees (100%) are subject to the same performance management cycle.	No omissions	

Performance indicators (related to material Aspects)				
GRI4 Code	Disclosure	Reference: AR, S(upplement) or W(bsite)	Omissions (+ reasons if applicable)	UN Global Compact
FS 6	Portfolio split by business lines, specific region, size and by sector	<p>Loans: AR: pp. 5 and 51 (loan portfolio by types of loans), p. 51 (loan portfolio by country), pp. 25 and 53 (real estate loans by collateral), p. 52 (mortgage loans by type), p. 53 (SME credit in Corporate Banking portfolio)</p> <p>Investment portfolio: AR: p. 26 (investment portfolio by country), p. 45 (portfolio of participating interests by number of companies), p. 55 (investment portfolio by counterparty and rating)</p> <p>Client assets: AR: p. 27 (client assets by type), p. 28 (AuM by type of service), p. 30 (PB AuM by country), p. 35 (AM AuM by service and client nationality)</p> <p>See also AR: p. 112 and beyond (loans by sectors).</p>	No omissions	
FS 7	Monetary value of products and services developed to realise specific social goals, split by business lines and purposes	Van Lanschot offers its clients a Charity Service (see AR, p. 31), focused on charity donations. We have also teamed up with Ashoka (see AR, p. 33). The aim of this partnership is to join forces with Van Lanschot clients to support social entrepreneurs committed to specific environmental or social causes.	Not included: the value of listed products/services	
FS 8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	Van Lanschot offers its clients a Charity Service (see AR, p. 31), focused on charity donations. We have also teamed up with Ashoka (see AR, p. 33). The aim of this partnership is to join forces with Van Lanschot clients to support social entrepreneurs committed to specific environmental or social causes.	Not included: the value of listed products/services	
FS 10	Percentage and number of companies in the portfolio with which the organisation has interacted on environmental or social issues	<p>AuS: AR: p. 36 (number of engagement activities). For assets under management (AuM) we do not express the number of engaged companies and fund managers as a percentage, as we do not know what the total is. We mainly invest in investment funds.</p> <p>Investment portfolio: AR: p. 55 (screening, no cases found)</p> <p>Loans: AR: pp. 51-52 (Responsible lending policy, number of cases screened) S: pp. 8-9 (Responsible lending policy, number of screening cases compared with full corporate loan portfolio)</p>	No omissions	

Performance indicators (related to material Aspects)				
GRI4 Code	Disclosure	Reference: AR, S(uppement) or W(bsite)	Omissions (+ reasons if applicable)	UN Global Compact
FS 11	Percentage of loans and investments subject to positive and negative environmental or social screening	<p>AuS: AR: pp. 36-37. Assets under screening (AuS) are calculated annually and reported in the AR, both in absolute terms and as a percentage of AuM. We also break down AuS by businesses (Private Banking and Asset Management). Screening is performed on negative criteria only. The only screening we are legally obliged to do is on cluster munitions (prescribed by the Financial Supervision Act or Wft).</p> <p>Investment portfolio: AR: p. 55 (screening, 100% screened for negative issues)</p> <p>Loans: AR: pp. 51-52 (Responsible lending policy, number of cases) S: pp. 8-9 (Responsible lending policy, number of screening cases compared with full corporate loan portfolio).</p>	No omissions	