



E-Signing Within ING WB Daily Banking

Background, Benefits & Usage

ING WB Client Services Solutions
ING WB ETDB



do your thing

Daily banking across Europe and (e)Signature usage

ING is continuously seeking to expand our digitization efforts and improve the client experience. In addition to accepting wet signatures as valid signing means on product contracts, ING is now working to strategically support eSignatures across ING locations. We want to enable our customers through providing opportunities to speed up processes, reducing carbon footprints working in safe and risk adverse environment.



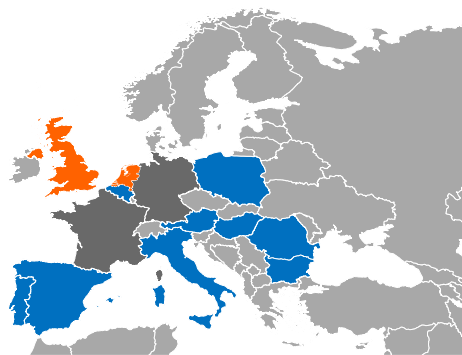
Wet signatures

To ensure business continuity, wet signature usage remains a viable means of doing business. In some countries where eSigning is not yet fully viable, ING WB temporarily accepts scanned documents with wet signatures being emailed to our servicing teams. However, the physically signed document must be posted to your local ING office.



eSignature acceptance

Working under the framework set forth under eIDAS regulation and the implementation under country legalization, different contracts require different types of eSignature, which may again vary in the legal jurisdiction of the contract. eSignatures are now accepted across many different countries with further developments expected Going forward.



- Simple Electronic Signatures (SES) +
- Qualified Electronic Signatures (QES)
- Advanced Electronic Signatures (AdES) +
- Evaluated on case-by-case basis



Initiating eSignature requests

ING has chosen AdobeSign as our target technology to initiate and facilitate contract eSigning requests and technically supports SES, AdES and QES. This strategic capability will be expanded supporting our digitization strategy.

We are working to continually increase the coverage of our eSigning capabilities across all ING entities with efforts being focused on the capabilities to initiate eSigning through ING AdobeSign in different locations.



ING eSignature

ING proxies are able to sign contracts using Simple and Advanced Electronic Signatures and in select locations, a Qualified Electronic Signature can also be used.

We have a strong preference to accept eSignatures facilitated through ING AdobeSign to build the required evidential trail, and to influence the signing experience. However, some ING locations may accept eSignatures from alternative eSignature platforms.

Client Services Epics

Challenges

Any signing transaction with ING can include the need to include multiple signatures with signees being present in different locations throughout the world. As working from home becomes the norm, this becomes more true than ever.

Logistically, having an agreement signed in person, can be a time consuming and complicated process. Physically transporting a paper document to all intended signees and sending that same agreement to the ING for processing takes time and effort.

Solution

To ease the signing process of product contracts, ING offers now eSigning capabilities through AdobeSign.

- The AdobeSign solution enables you to initiate and facilitate contract eSigning requests.
- It technically supports all three eSignature types (SES, AdES and QES). Different contracts require different types of eSignature, which may again vary in the legal jurisdiction of the contract

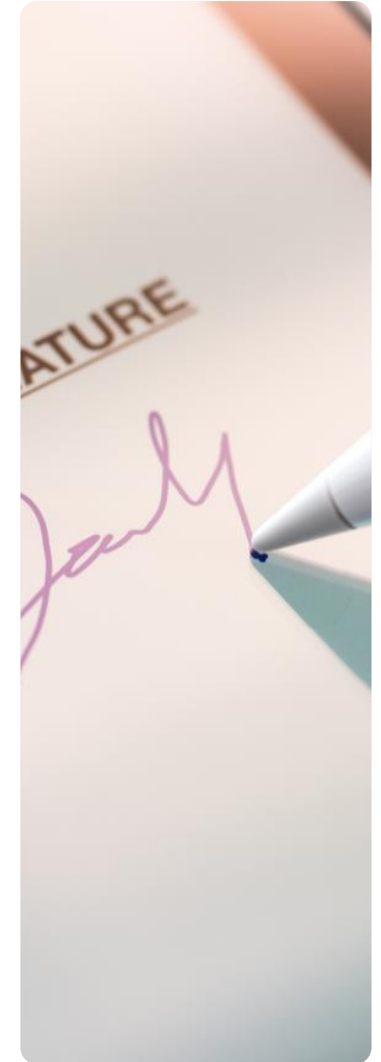
eSignatures are now accepted across many different countries with developments expected going forward.

We have a strong preference to accept eSignatures facilitated through ING AdobeSign to build the required evidential trail, and to influence the signing experience. However, some ING locations may accept eSignatures from alternative eSignature platforms.

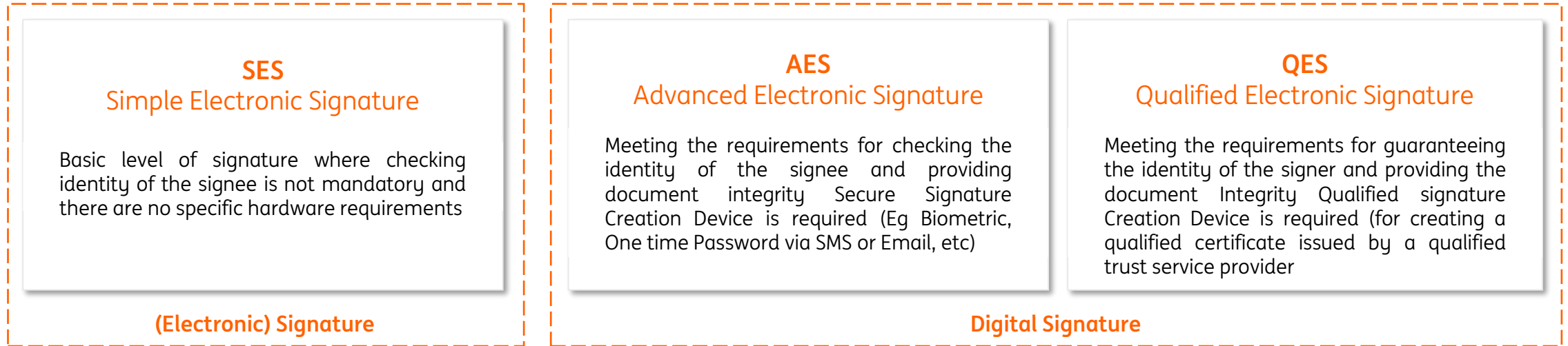
To provide flexibility to all our customers, we do allow the usage of all signature types if that is a generally accepted practice within our branches. Although, when operating across borders, using a QES is most accepted

Benefits

- Faster and easier signing processes
- reducing carbon footprints
- Enabler to work in safe and risk adverse environment under the framework set forth under eIDAS regulation

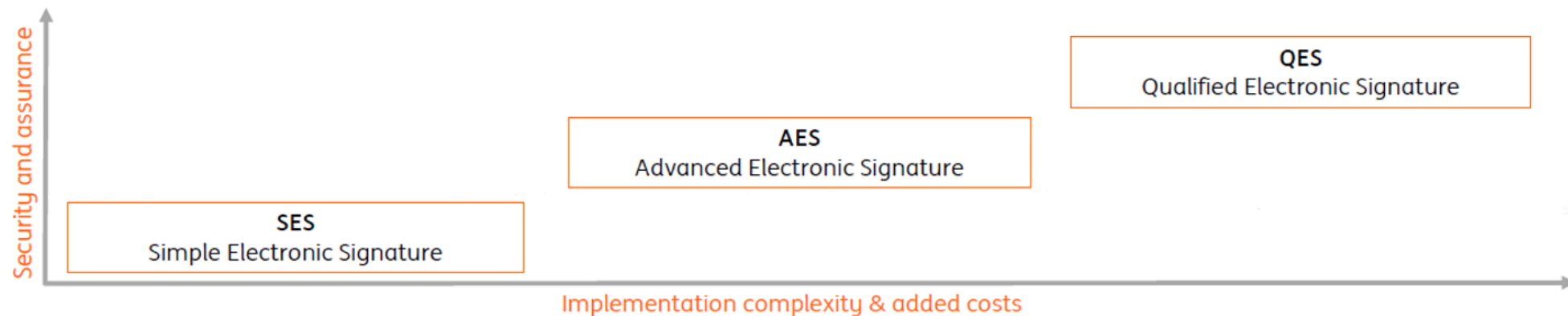


Types of E-Signature

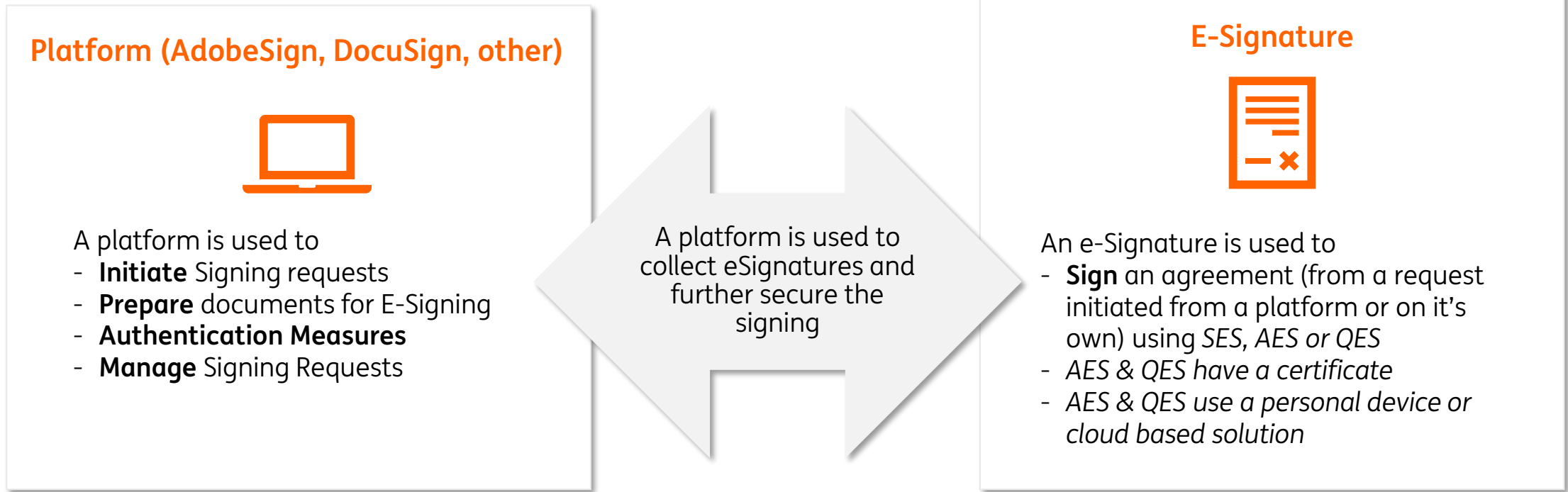


Any electronic signature has a measure of value by law and can bind a contract. Though electronic signature type requirements depend on a combination of trust, risk and practicality.

Acceptance of Signature Types differs from country to country and sometimes per document type. For the most part, this is mainly a Digital Signature, although some countries do accept SES.



E-Signing Platforms vs E-Signatures



Personal Signatures are required for Signees and must not be confused by Signatures put in place by a platform. DocuSign will put a signature in place, AdobeSign both a seal and a signature. Both of these are recognizable as “owned” by the platform and do not meet the requirements for a *personal signature*.

Signature Type acceptance (SES, AES or QES) is separate from the platform used; if an ING branch accepts a signature type, then this is not influenced by the platform used. However, bilaterally signed agreements, which need signatures from both ING & the client, can only be initiated by ING using AdobeSign.

Germany only accepts DocuSign as a 3rd party platform

E-Signature Procurement

Procuring a certificate is usually done through a 3rd party vendor, although in some cases in-house certificates will suffice. For each signature type this can be different. Below an overview of the possibilities for each.

With regards to the QES; a further distinction can be made between a local solution (like a card containing the certificate) and an online cloud based solution (logging into the site of a vendor). **Not all online solutions are currently supported by ING.**

SES

Simple Electronic Signature

SES makes no use of certificates. No vendor is required.

If SES is accepted, ING will require access to the audit report of the signing transaction. If signed through a 3rd party platform, this will need to be delivered together with the signed agreements.

A self-created certificate in Adobe is deemed a Simple Electronic Signature

(Electronic) Signature

AES

Advanced Electronic Signature

AES certificates can be procured by a vendor within or outside of the EU.

If your company uses personal certificates internally that are rated to be used as digital signatures, ING can accept these as well.

ING will require access to the audit report of the signing transaction. If signed through a 3rd party platform, this will need to be delivered together with the signed agreements.

Digital Signature

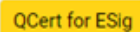
QES

Qualified Electronic Signature

QES certificates can be procured by a vendor within the EU.

Qualified Trusted Service Providers (QTSP) are available on the [EU Trusted List](#) (EUTL).

A QES procured in any country is acceptable in the EU. On the EUTL, vendors are visible with their offerings:

QES: 

AES: 

E-Signature Procurement

If you reside within the EU and wish to purchase a digital signature service, ensure that the signature meets eIDAS requirements, that is the service provider for the qualified signature (Qcert for Esig) must be on the European Union Trusted Lists (EUTL). Please note that some of these service providers offers an Advance electronic signature (Cert for Esig) service as well.

Your country of residence should inform your decision on vendor, as this will ease the onboarding process. A QES can then be used everywhere. Some cloud based solutions may not be compatible with all platforms.

The diagram illustrates the process of selecting a trusted service provider for e-signature procurement. It consists of three main steps:


- Trusted List Browser:** A search interface for the European Union Trusted Lists (EUTL). It shows a grid of countries with their respective issue dates. The Netherlands is highlighted with a red box, indicating it is the selected country.
- Trusted List Netherlands:** A list of currently active trust service providers in the Netherlands. The providers listed are: Aanetekend B.V. (QeRDS), Cleverbase ID B.V. (QCert for ESig), KPN B.V. (QCert for ESig, QCert for ES Seal), and Ministerie van Infrastructuur en Waterstaat (QCert for ESig). Cleverbase ID B.V. is highlighted with a red box.
- Cleverbase ID B.V. Trust services:** Detailed information for the selected provider. The information includes: Name (Cleverbase ID B.V.), Trade name (Cleverbase ID B.V.), Postal address (Maanweg 174, 2516 AB - NL), Electronic address (mailto:info@cleverbase.com), and Information URI (https://cleverbase.com/en/). The postal and electronic address sections are highlighted with a red box.

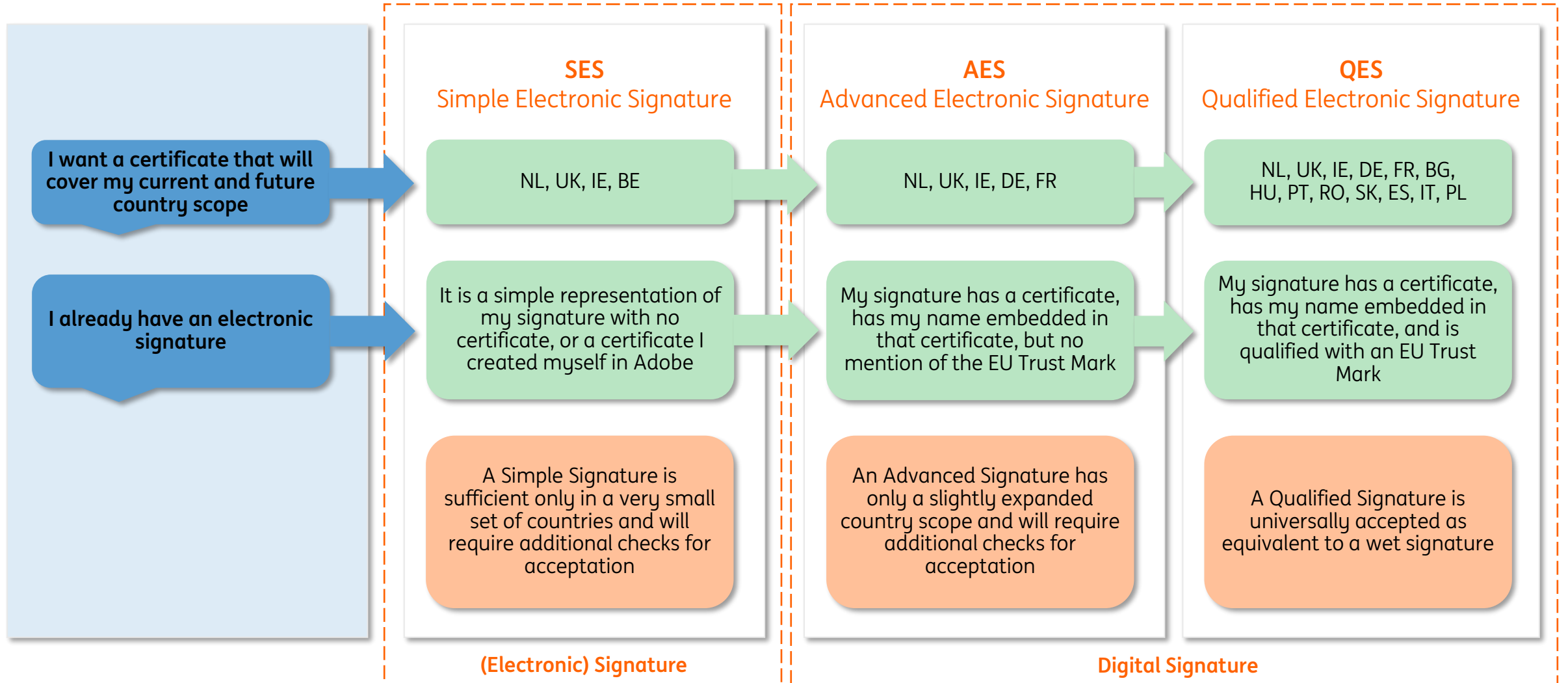
Select a service that possesses Qcert for eSign, Qcert for seal, and QTimestamp. Buying the full complete service will ensure that the signature purchased met both local, regulatory and bank requirements. If you are using your own platform, please consult your vendor contact to verify which service providers are integrated in their solution.

Also note that countries outside the EU (Like Switzerland, Turkey, etc) may consider QES from EU as an AES, and QES outside the EU maybe considered as AES within the EU.

E-Signature Procurement

To help decide which signature would be sufficient, or if a capable signature is already available, please consult below.

A QES signature is recognizable by the EU trust mark 



Country Capabilities

Accepted Documents (Daily Banking)

Documents	AT	BE	BG	CH	CZ	DE	ES	FR	HU	IE	IT	LU	NL	PL	PT	RO	SK	UK
Account Closing Instructions	SES	≥SES	QES	ZertES	QES	≥AES	No	≥SES	QES	AES	QES	No	≥SES	QES	No	QES	QES	AES
G-Rekening request form												No	No					
Transfer Account	No	No	No	No	No	No	No	No	No	No	No	No	≥SES	No	No	No	No	No
Virtual Bank Account (VBA)													≥SES					
WB Account Agreements + Appendix / Account Management Forms	SES	≥SES	QES	No	QES	≥AES	QES	≥SES	QES	≥SES	QES	QES	≥SES	QES	≥AES	QES	QES	≥SES
WBAO Annex / Signature Card						≥AES						No	No					
Audit Letter / Bank Confirmation Request	SES	≥SES	QES	ZertES	QES	≥AES	QES	≥SES	QES	≥SES	QES	≥SES	≥SES	QES	≥AES	QES	QES	≥SES
Corporate Card Form	SES	≥SES	QES	No	QES	No	No	≥AES	QES	No		QES	No	QES	No	QES	QES	No
Amendments to Cash Pools With a Lending Component	SES	≥SES	QES	ZertES	QES	≥AES	QES	≥AES	No	≥SES	QES	No	≥SES	QES	≥AES	QES	No	≥SES
Amendments to Cash Pools Without a Lending Component	SES	≥SES	QES	ZertES	QES	≥AES	QES	≥AES	No	≥SES	QES	No	≥SES	QES	≥AES	QES	No	≥SES
Cash Pool Agreements With a Lending Component	QES	≥SES	QES	ZertES	QES	No	No	≥AES	QES	≥SES	QES	No	≥SES	QES	No	QES	QES	≥SES
Cash Pool Agreements Without a Lending Component	SES	≥SES	QES	ZertES	QES	No	No	≥AES	QES	≥SES	QES	No	≥SES	QES	No	QES	QES	≥SES
Cash Collection Request	SES	≥SES	QES	No		No	No	No	QES	No		No	No	No	No	QES	QES	No
Letters	SES	No	QES	No	QES	≥AES	QES	≥SES	No	≥SES	SES	No	≥SES	No	≥AES	QES	No	≥SES
SDD agreements (Debit)		QES				≥AES	QES				QES	No	≥SES			QES	QES	
Corporate Agent POA (Power of Attorney)	SES	QES	QES	ZertES	QES	≥AES	QES	≥SES	QES	≥SES	QES	QES	≥SES	QES	≥AES	QES	QES	≥SES
Electronic Banking Forms / Channel Agreement	SES	≥SES	QES	ZertES	QES	≥AES	QES	≥SES	QES	≥SES	QES		≥SES	QES	≥AES	QES	QES	≥SES
Payment & Reporting setup documents	SES	≥SES	QES	ZertES	QES	≥AES	QES	≥AES	QES	≥SES	QES		≥SES	QES	≥AES	QES	QES	≥SES
B2B Mandate registration (Credit)	SES	No	QES	No	QES	≥AES	QES	≥SES	No	≥SES	SES	No	≥SES	No	≥AES	QES	No	≥SES
Day-to-day banking administration	SES	No	QES	ZertES	QES	≥AES	QES	≥SES	No	≥SES	QES	No	≥SES	No	≥AES	QES	No	≥SES
Mandates (non account related) Power of Attorney (POA)	SES	≥SES	No	ZertES	QES	≥AES	QES	No	No	≥SES	QES	QES	≥SES	QES	≥AES	QES	No	≥SES
Overstapservice													No					
Power of Attorney (Proxy representative) (POA)	SES	≥SES	No	No	No	LA / ≥AES	LA / ≥AES	≥SES	No	≥SES	No	QES	≥SES	QES	LA / ≥AES	QES	No	≥SES
Payment instruction	SES	≥SES	No		No	No		≥SES	No	No	QES	No	No					
Prepayment Notices				No		≥AES												
Pricing Agreement				ZertES	QES			≥SES	QES	≥SES		No	≥SES					≥SES
Annual Reports of customers						≥AES												

Further Country Differences in eSigning

- **Bilateral agreements** are excluded from DocuSign initiation, or at the very least **can only be countersigned by ING through AdobeSign**
- Initiation from **DocuSign** will require additional actions; for example 1) the delivery of the "Certificate of completion & 2) in some cases email confirmation of the request
- **Germany** only accepts DocuSign as a 3rd party platform
- **Czech Republic** does not currently allow the usage of **AdobeSign** as a platform
- **Switzerland** only accepts eSigning with a local variant of the QES called **ZertES**. This is not the same as the EU QES and will be recognized as an AES instead within the EU.
- **LA** means **Legal Advice** is required to determine if eSigning is allowed

Country Capabilities

Accepted Documents (Lending)

Documents	AT	BE	BG	CH	CZ	DE	ES	FR	HU	IE	IT	LU	NL	PL	PT	RO	SK	UK
bank guarantee facility for lending													≥SES					
Mortgage deeds and sharepledge deeds													≥SES					
Other pledge deeds drafted by ING (including bank account pledges)													≥SES					
Ancillary													≥SES					
Funding indemnity letters													≥SES					
Overdrafts													≥SES					
Power of Attorney													≥SES					
RCFs													≥SES					
Term Loan													≥SES					
Accession Letter						≥AES					QES	No						
Commitment letter						≥AES					QES	No						
Engagement Letter											QES	No						
Fee Letter / Fee Quote						≥AES					QES	No						
Love letter						≥AES					QES	No						
Mandate letter						≥AES					QES	No						
Release / Reliance Letter						≥AES					QES	No						
Termination Letter						≥AES					QES	No						
Waiver letter						≥AES					QES	No						
Commitment Letter													≥SES					
Fee Letter													≥SES					
Intercreditor agreement													≥SES					
Legal Opinions													≥SES					
Mandate Letter													≥SES					
NDA / Confidentiality agreements / Reliance letters													≥SES					

Further Country Differences in eSigning

- **Bilateral agreements** are excluded from DocuSign initiation, or at the very least **can only be countersigned by ING through AdobeSign**
- Initiation from **DocuSign** will require additional actions; for example 1) the delivery of the "Certificate of completion & 2) in some cases email confirmation of the request
- **Germany** only accepts DocuSign as a 3rd party platform
- **Czech Republic** does not currently allow the usage of **AdobeSign** as a platform
- **Switzerland** only accepts eSigning with a local variant of the QES called **ZertES**. This is not the same as the EU QES and will be recognized as an AES instead within the EU.
- **LA** means **Legal Advice** is required to determine if eSigning is allowed

Country Capabilities

Accepted Documents (Lending continued)

Documents	AT	BE	BG	CH	CZ	DE	ES	FR	HU	IE	IT	LU	NL	PL	PT	RO	SK	UK
NDA confidentiality agreements													≥SES					
Prepayment notice													≥SES					
Reservation of rights													≥SES					
Term Sheet													≥SES					
Transfer certificates													≥SES					
Utilisation request													≥SES					
Agency Fee invoice											QES	No						
Agreement (to any of the other agreements or letters listed here)						≥AES					QES	No						
Amendment (and Restatement) Agreements	≥SES		QES			≥AES		≥AES			QES	No						
Ancillary Agreement (check whether Security Rights are included)											QES	No						
Bank guarantees / (Standby) Letters of Credit											QES	No						
Bank statements (Standaard Bankverklaring)											QES	No						
Bilateral lending contracts	≥SES		QES			≥AES		≥AES			QES	No						
Cancellation Notice	≥SES		QES			No		≥AES			QES	No						
Certificates (e.g Tax related)						≥AES					QES	No						
Collateral related documents	≥SES		QES			No		≥AES			QES	No						
Deed of Assignment	≥SES					No					QES	No						
Drawdown Notice/Utilisation Request/Disbursement request	≥SES		QES			≥AES		≥SES			QES	No						
Drawdown requests (bilateral and syndicated deals)											QES	No						
Facility Agreement ⁵ (check whether Security Rights are included)						No					QES	No						
Funding indemnity letters											QES							
Guarantees (GXBL/Corporate Guarantees)											QES							
ICA											QES	No						
ICMA											QES	No						
Inhouse Capacity Legal Opinion / CRR						≥AES					QES	No						

Further Country Differences in eSigning

- **Bilateral agreements** are excluded from DocuSign initiation, or at the very least **can only be countersigned by ING through AdobeSign**
- Initiation from **DocuSign** will require additional actions; for example 1) the delivery of the “Certificate of completion & 2) in some cases email confirmation of the request
- **Germany** only accepts DocuSign as a 3rd party platform
- **Czech Republic** does not currently allow the usage of **AdobeSign** as a platform
- **Switzerland** only accepts eSigning with a local variant of the QES called **ZertES**. This is not the same as the EU QES and will be recognized as an AES instead within the EU.
- **LA** means **Legal Advice** is required to determine if eSigning is allowed

Country Capabilities

Accepted Documents (Lending continued)

Documents	AT	BE	BG	CH	CZ	DE	ES	FR	HU	IE	IT	LU	NL	PL	PT	RO	SK	UK
Intercreditor Agreement/Syndicate Agreement						≥AES					QES	No						
Invoice fees											QES	No						
Issuance request guarantee/LC											QES	No						
Mortgage deeds and sharepledge deeds											QES							
NDA/Confidentiality letter / agreements						≥AES					QES	No						
Notary Letter											QES	No						
Notice of pledge of bank accounts											QES	No						
Other pledge deeds drafted by ING (including bank account pledges)											QES							
Overdraft agreements	≥SES		QES			No		≥AES			QES	No						
PoA - Power of Attorney (except for PoA's entering into security documents)						≥AES					QES	No						
Prepayment Notice	≥SES		QES			No		≥AES			QES	No						
RCFs											QES							
Release of securities						LA / ≥AES					QES	No						
Reservations of Rights						≥AES					QES	No						
Rollover confirmations											QES	No						
Rollover requests											QES	No						
Security Agreement/Document	≥SES					LA / ≥AES					QES	No						
Security Rights / Security Documents						LA / AES					QES	No						
Syndicated lending agreements	≥SES		QES			≥AES		≥AES			QES	No						
Term Loan											QES							
Term sheet						≥AES					QES	No						
Transfer Certificate						≥AES					QES	No						
Upfront Fee invoice											QES	No						
Utilization / Guarantee request						≥AES					QES	No						
syndicated lending agreements						≥AES					QES	No						

Further Country Differences in eSigning

- **Bilateral agreements** are excluded from DocuSign initiation, or at the very least **can only be countersigned by ING through AdobeSign**
- Initiation from **DocuSign** will require additional actions; for example 1) the delivery of the "Certificate of completion & 2) in some cases email confirmation of the request
- **Germany** only accepts DocuSign as a 3rd party platform
- **Czech Republic** does not currently allow the usage of **AdobeSign** as a platform
- **Switzerland** only accepts eSigning with a local variant of the QES called **ZertES**. This is not the same as the EU QES and will be recognized as an AES instead within the EU.
- **LA** means **Legal Advice** is required to determine if eSigning is allowed

Country Capabilities

Accepted Documents (Trade)

Documents	AT	BE	BG	CH	CZ	DE	ES	FR	HU	IE	IT	LU	NL	PL	PT	RO	SK	UK
Export collection letter request / Amendment	SES		QES			≥AES		≥AES			QES		≥SES					
Import collection payment order	SES		QES			≥AES		≥AES			QES							
Amendment of surety towards beneficiary						≥AES					QES							
Application for letter guarantee issuance	SES		QES			≥AES		≥AES			QES		≥SES					
GUAR invoices towards applicant						≥AES					QES							
General communication in regards to TFS business						≥AES					QES							
Guarantee application request / Amendment						≥AES					QES		≥SES					
Surety issuance towards beneficiary	SES		QES			≥AES		≥AES			QES							
Application for issuance/request for amendment of LC	SES		QES			≥AES		≥AES			QES							
Avis of confirmed export L/C & Amendment	SES		QES			≥AES		≥AES			QES							
Export letter of credit – Forfaiting contract						≥AES					QES							
Export letter of credit – acceptance of amendment	SES		QES			≥AES		≥AES			QES							
Export letter of credit – silent confirmation letter	SES		QES			≥AES		≥AES			QES							
Import letter of credit request / Amendment	SES		QES			≥AES		≥AES			QES							
Import letter of credit – Acceptance of discrepant documents	SES		QES			≥AES		≥AES			QES							
SBLC invoices towards applicant						≥AES					QES							
Standby letter of credit request / Amendment	SES		QES			≥AES		≥AES			QES							
Acceptance letter with regard to foreign law	SES		QES			≥AES		≥AES			QES							
Free format letters with instructions from customers	SES		QES			≥AES		≥AES			QES							
Confirmations for the receipt of documents	SES		QES			≥AES		≥AES			QES							

Further Country Differences in eSigning

- **Bilateral agreements** are excluded from DocuSign initiation, or at the very least **can only be countersigned by ING through AdobeSign**
- Initiation from **DocuSign** will require additional actions; for example 1) the delivery of the "Certificate of completion & 2) in some cases email confirmation of the request
- **Germany** only accepts DocuSign as a 3rd party platform
- **Czech Republic** does not currently allow the usage of **AdobeSign** as a platform
- **Switzerland** only accepts eSigning with a local variant of the QES called **ZertES**. This is not the same as the EU QES and will be recognized as an AES instead within the EU.
- **LA** means **Legal Advice** is required to determine if eSigning is allowed

Country Capabilities

Accepted Documents (KYC)

Documents	AT	BE	BG	CH	CZ	DE	ES	FR	HU	IE	IT	LU	NL	PL	PT	RO	SK	UK
ID verification by authorized customer staff (e.g. Passport copy)						No		≥SES				QES						
Major Sanctioned Countries Questionnaire						≥AES		≥SES				≥SES						
AML Letter												≥SES						
AML/CTF questionnaire												≥SES						
Application for a business VISA card												≥SES						
Client Due Diligence form												≥SES						
Declaration of Beneficial Ownership						≥AES		≥SES				≥SES						
KYC questionnaire												≥SES						
KYC-statement						≥AES		≥SES										
Sanctions questionnaire												≥SES						
Structure Charts						≥AES		≥SES				≥SES						
constitutional documents						No		≥SES										
Self-certification form to establish tax status for entities						≥AES		≥SES										
Tax forms						≥AES		≥SES										

Further Country Differences in eSigning

- **Bilateral agreements** are excluded from DocuSign initiation, or at the very least **can only be countersigned by ING through AdobeSign**
- Initiation from **DocuSign** will require additional actions; for example 1) the delivery of the "Certificate of completion & 2) in some cases email confirmation of the request
- **Germany** only accepts DocuSign as a 3rd party platform
- **Czech Republic** does not currently allow the usage of **AdobeSign** as a platform
- **Switzerland** only accepts eSigning with a local variant of the QES called **ZertES**. This is not the same as the EU QES and will be recognized as an AES instead within the EU.
- **LA** means **Legal Advice** is required to determine if eSigning is allowed

Country Capabilities

Accepted Documents (WCS, Legal, Strategic, Coverage, FM, Other)

Documents	AT	BE	BG	CH	CZ	DE	ES	FR	HU	IE	IT	LU	NL	PL	PT	RO	SK	UK
Mandate letters in M&A context						≥AES		≥AES										
FM master agreements						LA / ≥AES	No	No							No			
Dealing Services Agreement			QES			No		No				No						
FX Deal						LA / ≥AES		No				No	No					
Notification Letter						≥AES		No				No						
Amendment Sheet (MSA, SoS, CGD)						≥AES		≥AES				No						
Change Governance Document (CGD)						≥AES		No				No						
Statement of Service (SoS)						≥AES		No				No						
Upfront Fee invoice						≥AES		≥SES				No						
Guarantee						No		No										
Account Pledge Agreement						LA / ≥AES		No				No						
Assignment of...						LA		≥AES										
Floating Charge Agreement						LA / ≥AES		No										
Mortgage						LA / ≥AES		No										
Notice of Assignment						LA		≥AES										
Security Assignment receivables	SES					LA		No										
Security Transfer Agreement	SES					LA		No										
Share Pledge Agreement						LA / ≥AES		≥AES				No						
Fee letters						LA / ≥AES		≥AES										
Contractual Documentation	SES	QES	No															QES
True sale perfection	SES	SES	No															QES

Further Country Differences in eSigning

- **Bilateral agreements** are excluded from DocuSign initiation, or at the very least **can only be countersigned by ING through AdobeSign**
- Initiation from **DocuSign** will require additional actions; for example 1) the delivery of the "Certificate of completion & 2) in some cases email confirmation of the request
- **Germany** only accepts DocuSign as a 3rd party platform
- **Czech Republic** does not currently allow the usage of **AdobeSign** as a platform
- **Switzerland** only accepts eSigning with a local variant of the QES called **ZertES**. This is not the same as the EU QES and will be recognized as an AES instead within the EU.
- **LA** means **Legal Advice** is required to determine if eSigning is allowed