



Scenario 4: A New New Deal  
Populist Democrat elected

An ING report in conjunction with Oxford Analytica  
[www.oxan.com](http://www.oxan.com)

## Preface

Trump has changed the rules and forecasters are struggling to keep up

Since his surprise election victory in 2016, US President Trump has been challenging and changing the political and economic rules. Pollsters, forecasters and investors not only largely failed to predict his win, but misread the consequences. He has pursued his populist agenda in ways that have been unconventional and often unpredictable. 'Fake news' and the echo chamber effects of social media have fuelled the polarisation of politics, making it all the harder to find objective and reliable analysis. Forecasters across the world are struggling to cope with this evolving political disruption.

We present four scenarios looking ahead to the outcome of the 2020 elections and beyond

In an effort to address this, we have decided to launch a concerted and ongoing effort to analyse the implications of the US political outlook in a structured way. To start, we have decided to focus on four alternative scenarios looking ahead to the outcome of the 2020 elections and beyond. Our goal is to focus less on the probability of these scenarios than their impact. To do so, we will aim to objectively identify the economic, social and political drivers of the scenarios to develop plausible narratives which we hope will help readers to form their own judgements about the likely outcomes. The fourth scenario, a populist Democrat victory, is outlined below.

Working with Oxford Analytica to draw out the economic and market implications

To produce this report, which will be followed by a series, we have teamed up with Oxford Analytica, an independent geopolitical analysis and consulting firm that draws on a worldwide network of experts. Founded in 1975, it has developed an unrivalled reputation for impartial analysis in this field. ING's team of economists and market strategists are working closely with the Oxford Analytica team both to craft the scenarios and to draw out the economic and market implications. This scene-setting report is the first fruit of this collaboration. Since the story will doubtless take unpredictable turns in the months to come, we will be tracking events closely, gathering feedback from our readers and clients, and producing regular updates. Your comments and suggestions would be welcome.

**Mark Cliffe**

**Chief Economist ING Group**

Fig 1 Economic and market conditions pre and post election



Source: ING

# Scenario 4: A New New Deal

## Populist Democrat elected

### Main candidates

Massachusetts Senator	Elizabeth Warren
Vermont Senator	Bernie Sanders
Mayor of South Bend	Peter Buttigieg

This scenario focuses on the potential for a populist Democratic candidate to be elected. Separate from a progressive candidate, which is someone who favours left leaning policy choices, a populist Democratic nominee is one who favours more immediate and wide-sweeping changes to the system than the incremental change favoured by centrists, and is grounded in activist-centric politics outside of party power structures. Many Democratic candidates in the 2020 election describe themselves or their policies as progressive, but relatively few inhabit the role of populist, with Senators Elizabeth Warren and Bernie Sanders and South Bend Mayor Pete Buttigieg the only three major candidates to do so. As mentioned previously, while unlikely, given the nature of populist politics, the potential also exists for another populist Democratic candidate to emerge prior to the election.

A populist Democrat must secure the party nomination and also dominate the national narrative

A populist would be favoured to win in a narrow primary contest where his or her support from grassroots organisations would carry the most weight. This advantage in the traditional primary system does not however carry over to a national election, where a populist candidate may find themselves too far outside of the political mainstream in many states, leading to a similar electoral outcome to 2016. This scenario therefore rests on a populist Democrat being able to secure the party nomination, while also being able to dominate the national narrative surrounding the election, forcing it to be about traditional issues for either party.

A win is predicated on the public desire for change

The election of a populist Democrat is also predicated on the electorate's desire for change. If the status quo is popular with most Americans, a populist will struggle to make the case for a major shift in direction. Poor economic performance, or exceedingly low approval ratings for Trump (below 30%) would be signs that the electorate could be amenable to a populist Democrat.

\*This section is meant to illustrate a hypothetical series of events that may play out and lead to the scenario outcome. This is not to deny that there are many paths which could play out.

Trump resigns unexpectedly. Populists pledge to run a supercharged version of Obama's 2012 message against Romney

### Looking back from January 2021: How a populist Democrat was elected

The race shifted dramatically in mid-2019 when Trump resigned unexpectedly. Immediately, the Democratic candidates were forced to re-evaluate their electoral strategies. The electability argument was turned on its head, as moderate suburbanites were replaced by voters who had earlier switched from Obama to Trump as the key demographic that would determine the election. Centrist candidates who had been touting a new map based around victories in previously Republican states of Georgia and Arizona lost ground among donors to populists who pledged to run a supercharged version of Obama's 2012 message against Romney, reuniting his coalition and retaking the Midwest. Their arguments gained credence when Romney announced his candidacy

and quickly became a heavy favourite for the Republican nomination over the newly appointed President Pence.

---

*“The impact of the No Deal Brexit and the lingering effects of the trade wars saw the stock market fall heavily.”*

---

The Democratic race was focused largely on social issues during the primary, and steady inroads were made by a few populists as the global economy worsened and another wave of scandals by major technology companies

were reported in the media. The economy continued to lose momentum and together with the ongoing trade wars resulted in the stock market falling heavily. The working class, including poorer white voters who previously supported President Trump, became a key demographic for these populist candidates.

Global economy worsens.  
Business confidence plunges,  
unemployment rises, stock  
market falls heavily

Plunging business confidence hit the labour market hard with unemployment starting to rise and wage growth stalled. Households grew increasingly cautious, pulling back on discretionary spending, while the housing market downturn accelerated.

Populist Democrats argued that the country was hungry for change and those who had been talking about drastic change for the entire campaign saw their credibility enhanced among primary voters.

Populists ask “Who is better off  
than four years ago?” with  
images of record corporate  
profits, the 2017 tax cut, and  
stories of workers’ stagnant  
wages

The echoes of 2008 grew after the nomination, when the Republican candidate tried to unify the party with a pro-Trump Vice Presidential candidate. Democrats tied their opponents to the unpopular Trump and to worries about a recession which seemed to be looming. The question that ran on advertisements played on the famous Reagan line of “Are you better off than you were four years ago?” They asked voters “Who is better off than four years ago?” with images of record corporate profits, the 2017 tax cut, and stories of workers’ stagnant wages. The tactic was effective. Instead of highlighting their tax package and the state of the economy, the Republican nominee was forced to pivot to cultural and social issues, which did not have the same impact as in 2016, or to debate economic policies, which played into the Democrats’ desired game plan.

End result is a narrow  
Democratic victory

The polls had gyrated dramatically over the campaign, and the predictions spanned the gamut from landslide Democratic win to comfortable Republican victory because analysts were unable to confidently predict turnout among white voters without college degrees. The result was a narrow Democratic victory.

## Timeline

### SCENARIO 4



This timeline outlines some of the key events that may take place leading to a populist Democratic candidate winning their party's nomination and being elected in November 2020.

Although fictional, the events mentioned highlight the type of issues and signposts that point to factors being favourable for a populist Democratic candidate to both win the Democratic Party nomination and a national election.

Economic performance  
**Faltering**

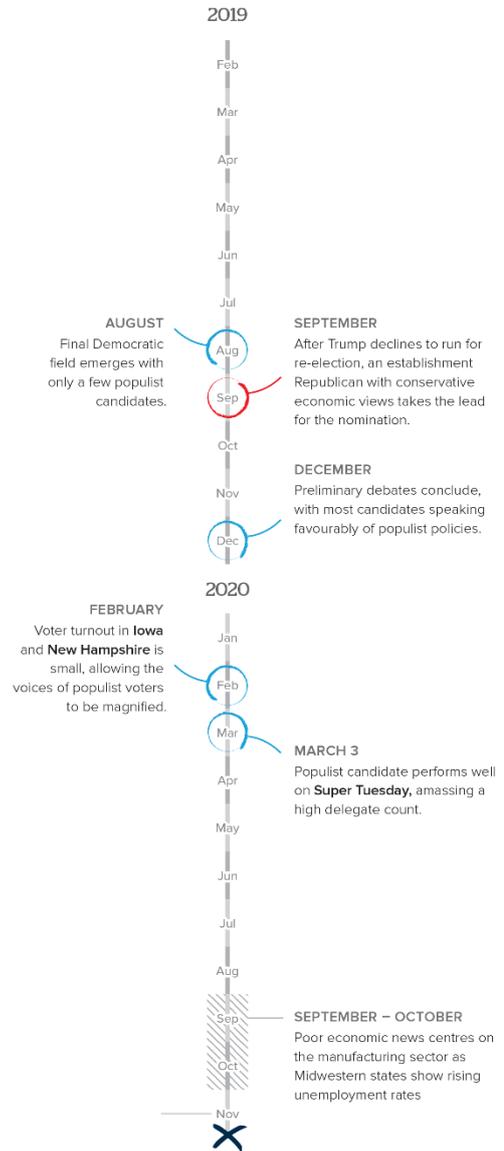
Sallient issue  
**Healthcare**

Identity politics  
**Class lines**

**Grey Swan events**  
*Low probability, high impact events that can lead to the scenario outcome.*

- Trump tax returns are released to show evidence of decades of tax avoidance.
- Congressional oversight committees find extensive corruption in Trump administration and unethical influence from lobbyists.
- At a debate, a leading centrist attempts to copy the populist policy agenda but mixes up simple terms and is exposed for lack of knowledge / competence.
- House of Representatives pass a Green New Deal.

### Signposts



Source: ING, Oxford Analytica

Populist President and Republican Senate risks gridlock but with economy likely in recession, some stimulus is possible

### Impacts – Gridlock?

With the Senate controlled by Republicans, there is a risk of gridlock. Republicans could use the narrative of fiscal prudence to push back on Democratic plans. However, with the economy likely in recession, they could acquiesce and allow some infrastructure spending to go through, though major tax rises for corporates would be blocked by the Senate. Republicans would also oppose a wealth tax or at least try to minimise it.

Markets and the dollar may initially rally on the fiscal stimulus to combat economic weakness, but there could well be a sense of nervousness about the longer-term implications of a 'tax and spend' and generally more interventionist President.

---

*“If a steep fall in economic output and job losses fails to unify both sides of the political spectrum...the Federal Reserve would need to step in.”*

---

Given the economic backdrop and the desire for 'change', this is the most economically uncertain scenario. If a steep fall in economic output and job losses fails to unify both sides of the political spectrum, and the President

and Congress find themselves at loggerheads, the Federal Reserve would need to step in with a more aggressive response that includes rate cuts and quantitative easing. The dollar would fall, and equities would suffer.

### Monetary policy – Challenging the Fed's mandate

New President could push the Fed to ease further and could also talk down dollar

Given the strained economic environment, the new President could take an interventionist approach towards the Federal Reserve to encourage even more policy easing while also talking down dollar. This could involve a formal change to the Fed's mandate either to raise the longer-term inflation target from the current 2% or even include a formal target for employment. In 'normal' times, financial markets would penalise such action, but in a weak economic situation, this could actually provide a boost to US financial market sentiment.

### Fiscal policy – Redistributive taxes and spend, spend, spend

Push to eliminate PAYGO, tax increases on businesses and high earners

Populist Democrats could push to eliminate PAYGO, although they would argue that their policies of expanding government funding for healthcare and infrastructure are investments that would reduce future deficits. Once the economy is on a stronger footing we could see more momentum for tax increases on corporations or high earning households to fund additional expenditure on social welfare programmes.

Working class giveaways, including a national living wage, free higher education and universal healthcare could cost \$50 trillion over 10 years

A populist Democrat could also embrace modern monetary theory (MMT), which downplays the importance of balancing budgets, so would be more open to a host of packages that lead to higher deficits, including a fiscally expansive "Green New Deal". Such a programme would demand significant federal investment, while also having a redistributive effect towards working class voters in the form of a national living wage, free higher education, and universal healthcare.

The costs of this are hard to foresee. Some estimates go as high as \$93 trillion<sup>1</sup> over the next decade in its most extreme form, but there are caveats. Moreover the costs of such a programme, including upgrading all existing buildings in the US, upgrading power grids and meeting 100% of the US' power demand through "clean, renewable and zero emission energy sources", has to be set against the potential economic and social costs of global warming and pollution. <sup>2</sup>

Expansionary budget is a near-certainty

While the private sector would be expected to contribute, most of the burden would fall on the government. A large fiscally expansionary budget would thus be a near certainty

---

<sup>1</sup> <https://www.americanactionforum.org/research/the-green-new-deal-scope-scale-and-implications/>

<sup>2</sup> <https://ocasio-cortez.house.gov/sites/ocasio-cortez.house.gov/files/Resolution%20on%20a%20Green%20New%20Deal.pdf>

New Medicare plan would cover 100% of the population and include government-regulated pricing structures. Inflation is reduced but healthcare stocks take a hit

Tech monopolies seen broken up, tax rates on tech firms may go up

A populist President could join TPP after a period of negotiation. A trade deal with EU is more likely and a new TTIP could pass on both sides of the Atlantic

A Green New Deal would be one of the major foreign policy priorities

A carbon tax could be implemented, potentially adding to headline inflation

in this scenario, which would likely lead to higher government borrowing costs despite the arguments of MMT proponents.

### Healthcare – Medicare, and cheap drugs, for all

A populist would seek to implement Medicare for All; considerable legislative debate could then ensue about the logistics, but the direction of the plan would be for 100% coverage of the population and government-regulated pricing structures. This would lead to faster reductions in drug prices and healthcare costs, which could materially reduce the overall rate of inflation. However, the disruption to health markets could lead to unintended consequences throughout the health industry, and a fall in the value of this sector in the stock market.

### Technological regulation – Big squeeze on Big Tech

A populist Democrat could seek to break up tech monopolies and increase the real tax burden on these firms. There would be major legislation regarding data privacy, which could allow consumers to ‘lease’ their data, creating a new industry.

Competition with Chinese tech firms and concerns that US workers are vulnerable to job losses from intellectual property theft could lead to executive actions that contribute to a bifurcated global technological market, with negative effects on trade, investment and the financial markets. A populist Democrat, might, however, seek to support US technology with increased federal funding for investment, which would boost investor confidence in the sector.

### International trade – Job-focused protectionism

A populist would be less likely to join existing trade deals, or negotiate new ones, but could seek to renegotiate existing arrangements if provisions for workers’ rights and environmental protection were strengthened. They may join the Trans-Pacific Partnership but only after a year or two of negotiating. A trade deal with Europe is more likely, since the EU does not pose the same fear of undercutting wages. A harder line against countries seen to be undercutting US labour in terms of wages or conditions would be expected. Countries such as Ireland, which offer low corporate income tax rates and where significant overseas holdings of US corporations are located, would also face additional scrutiny.

A populist Democrat is likely to be opposed to some of the policies advocated by the US corporate community and which are also opposed by many Europeans - perhaps increasing the chances of a new Transatlantic Trade and Investment Partnership (TTIP) to pass on both sides of the Atlantic.

### Climate and energy – Strong support for the Green New Deal

A “Green New Deal” aimed at making America carbon neutral would see major public financing of climate strategies. This would likely encompass an infrastructure package, energy regulations, increased funding for scientific research, and legislation targeting economic inequality. It would also be one of the major foreign policy priorities of the new administration, with an expanded Paris Agreement being one of the first tasks for the new Secretary of State. Increased taxation on corporations to fund this fiscally expansive programme would be expected, as would higher income taxes on both wealthy and upper-middle class earners.

As part of this redistribution, a carbon tax would most certainly be implemented, even in the face of Republican opposition in Congress. This would add to headline inflation, although the effect would depend on whether the proceeds were used to reduce other consumption taxes (which might be targeted at items consumed by the middle and lower-middle class).

Ending tax havens would be a primary goal

### Foreign policy – Economically driven

A populist Democrat would place economic issues at the centre of a foreign policy agenda; ending tax havens would be one of the primary goals of the new Administration. This would require the cooperation of European allies in the fight against tax avoidance. Russia could be framed as less of a hostile nation than a source of laundered funds; cooperation with Moscow is possible if a global fight against capital flight is in the interests of Putin or his successor.

Stimulus measures suggest a swifter economic recovery

### Populist Democrat elected with Democrat-controlled Congress

Given the sweeping political shifts that would likely accompany a populist Democratic candidate to the White House, this scenario has a higher potential of also having a Democratic-controlled Congress compared to if a centrist Democrat is elected.

With Congressional Democrats keener to support the President's initial stimulus efforts, there is the prospect of a swifter economic recovery. The stimulus would be concentrated on spending increases with little prospect of tax cuts other than for low income households. Changes to the Federal Reserve's mandate would also be more probable and aggressive rhetoric to weaken the dollar is also likely.

But longer term, higher fiscal deficits are likely, which would be bad for the dollar and Treasuries

Longer term, a populist Democrat with Democrat Congress may mean higher fiscal deficits for longer than markets would like. This is unlikely to be good for the dollar or for Treasuries, especially if Federal Reserve monetary policy is perceived to be loose given any changes to its mandate. Corporate America could become more nervous about taxation policy and a more interventionist government, with US equity markets suffering as a consequence. Wealth taxes could be introduced, leading to outflows from US assets. Investment more broadly into America could also suffer while trade tensions could return as the President seeks to protect US workers from cheap competition.

Alternatively, if the Fed re-asserted its independence, it could swiftly normalise monetary policy, giving the dollar a boost

An alternative scenario for the dollar is that if the Federal Reserve decides to push back against the President and reassert its independence, it could be more inclined to swiftly normalise monetary policy in the upturn. Historically, this is a positive USD environment, though given the negatives already mentioned regarding interventionism, the dollar's performance may be more nuanced.

## Conclusion

President Trump has ripped up the rule book. His blend of identity politics and transactional policy-making will have lasting effects regardless of the outcome of the election in 2020.

In this report, we have identified four key scenarios: Trump is re-elected, Trump leaves the race and another Republican candidate triumphs, a centrist Democrat is elected or a populist Democrat emerges victorious. As we have shown, the consequences for the economy and markets could be profoundly different.

Should President Trump win, we see a potential boom-bust scenario, particularly if Republicans also win control of Congress. While additional fiscal stimulus could fuel an initial boost, this would likely be cut short by substantial monetary tightening from the Federal Reserve.

Were another Republican to replace him, less confrontational international relations and a more fiscally-conservative stance would likely lead to a less volatile economic and market performance.

In our view, a victory for Democrats would partly stem from a weaker pre-election economy, creating pressure for a policy stimulus from the incoming Administration. Under a centrist Democrat, equity markets and the dollar would likely be weak initially before moving into recovery mode, with interest rates held in check by subdued inflation.

If the economy were to see a more prolonged and significant period of weakness prior to the election, the odds of a populist Democrat winning the White House shorten, particularly given their likely platform of aggressive fiscal stimulus. Pressure would also mount on the Federal Reserve to respond aggressively, especially if its mandate is changed to focus increasingly on employment. Massive stimulus would lift the economy, but trade protectionism, higher wealth, income and corporate taxes, and market interventions could pose challenges to the financial markets.

Our scenarios highlight the high stakes involved in the 2020 elections. Since there is time for many surprises along the way, we will be watching closely to update and calibrate our assessments. The disruptions triggered by the Trump Presidency are far from over.

**Mark Cliffe, Chief Economist, ING Group**

**+44 20 7767 6283**

**James Knightley, Chief International Economist, ING Group**

**+44 20 7767 6614**

**Amalia Khachatryan, Deputy Director of Advisory, Oxford Analytica**

**+44 1865 261 600**

**Evan Karr, Senior Associate of Advisory, Oxford Analytica**

**+44 1865 261 600**

**Giles Alston, Senior Associate of Advisory, Oxford Analytica**

**+1 646 430 9014**

## Research Analyst Contacts

Developed Markets		Title	Telephone	Email
London	Mark Cliffe	Head of Global Markets Research	44 20 7767 6283	mark.cliffe@ing.com
	James Knightley	Chief International Economist	44 20 7767 6614	james.knightley@ing.com
	James Smith	Economist, Developed Markets	44 20 7767 1038	james.smith@ing.com
	Jonas Goltermann	Economist, Developed Markets	44 20 7767 6909	jonas.goltermann@ing.com
	Carlo Cocuzzo	Economist	44 20 7767 5306	carlo.cocuzzo@ing.com
	Chris Turner	Global Head of Strategy and Head of EMEA and LATAM Research	44 20 7767 1610	chris.turner@ing.com
	Petr Krpata	Chief EMEA FX and IR Strategist	44 20 7767 6561	petr.krpata@ing.com
	Padhraic Garvey	Global Head of Debt and Rates Strategy	44 20 7767 8057	padhraic.garvey@ing.com
Amsterdam	Maarten Leen	Head of Macro Economics	31 20 563 4406	maarten.leen@ing.com
	Teunis Brosens	Senior Economist, Eurozone	31 20 563 6167	teunis.brosens@ing.com
	Bert Colijn	Senior Economist, Eurozone	31 20 563 4926	bert.colijn@ing.com
	Raoul Leering	Head of International Trade Analysis	31 20 576 0313	raoul.leering@ing.com
	Joanna Konings	Senior Economist, International Trade Analysis	31 20 576 4366	joanna.konings@ing.com
	Timme Spakman	Economist, International Trade Analysis	31 20 576 4469	timme.spakman@ing.com
	Marieke Blom	Chief Economist, Netherlands	31 20 576 0465	marieke.blom@ing.com
	Marcel Klok	Senior Economist, Netherlands	31 20 576 0465	marcel.klok@ing.com
	Jeroen van den Broek	Head of DM Strategy and Research	31 20 563 8959	jeroen.van.den.broek@ing.com
	Maureen Schuller	Head of Covered Bond Strategy and Financials Research	31 20 563 8941	maureen.schuller@ing.com
	Benjamin Schroeder	Senior Rates Strategist	31 20 563 8955	benjamin.schroeder@ing.com
	Warren Patterson	Head of Commodities Strategy	31 20 563 8921	warren.patterson@ing.com
	Suvi Platerink Kosonen	Senior Credit Analyst, Financials	31 20 563 8029	suvi.platerink@ing.com
	Nadège Tillier	Senior Credit Analyst, Utilities	31 20 563 8967	nadege.tillier@ing.com
	Hendrik Wiersma	Senior Credit Analyst, TMT	31 20 563 8961	hendrik.wiersma@ing.com
Job Veenendaal	Credit Analyst, Consumer Products and Retail	31 20 563 8956	job.veenendaal@ing.com	
Roelof-Jan van den Akker	Head of Technical Analysis	31 20 563 8178	roelof-jan.van.den.akker@ing.com	
Brussels	Peter Vanden Houte	Chief Economist, Belgium, Eurozone	32 2 547 8009	peter.vandenhoute@ing.com
	Julien Manceaux	Senior Economist, France, Belgium, Switzerland	32 2 547 3350	julien.manceaux@ing.com
	Philippe Ledent	Senior Economist, Belgium, Luxembourg	32 2 547 3161	philippe.ledent@ing.com
	Steven Trypsteen	Economist, Spain, Portugal	32 2 547 3379	steven.trypsteen@ing.com
	Charlotte de Montpellier	Economist, Switzerland	32 2 547 3386	charlotte.de.montpellier@ing.com
Frankfurt	Carsten Brzeski	Chief Economist, Germany, Austria	49 69 27 222 64455	carsten.brzeski@ing.de
	Inga Fechner	Economist, Germany, Austria	49 69 27 222 66131	inga.fechner@ing.de
Milan	Paolo Pizzoli	Senior Economist, EMU, Italy, Greece	39 02 55226 2468	paolo.pizzoli@ing.com
Emerging Markets		Title	Telephone	Email
New York	Gustavo Rangel	Chief Economist, LATAM	1 646 424 6464	gustavo.rangel@ing.com
London	Nicholas Smallwood	Senior Emerging Markets Credit Analyst	44 20 7767 1045	nicholas.smallwood@ing.com
	Trieu Pham	Emerging Markets Sovereign Debt Strategist	44 20 7767 6746	trieu.pham@ing.com
Czech Rep	Jakub Seidler	Chief Economist, Czech Republic	420 257 47 4432	jakub.seidler@ing.com
Hong Kong	Iris Pang	Economist, Greater China	852 2848 8071	iris.pang@asia.ing.com
Hungary	Péter Virovác	Senior Economist, Hungary	36 1 235 8757	peter.virovacz@ing.com
Philippines	Nicky Mapa	Senior Economist, Philippines	632 479 8855	nicholas.mapa@asia.ing.com
Poland	Rafal Benecki	Chief Economist, Poland	48 22 820 4696	rafal.benecki@ingbank.pl
	Piotr Poplawski	Senior Economist, Poland	48 22 820 4078	piotr.poplawski@ingbank.pl
	Jakub Rybacki	Economist, Poland	48 22 820 4608	jakub.rybacki@ingbank.pl
	Karol Pogorzelski	Economist, Poland	48 22 820 4891	karol.pogorzelski@ingbank.pl
Romania	Ciprian Dascalu	Chief Economist, Romania	40 31 406 8990	ciprian.dascalu@ing.com
	Valentin Tataru	Economist, Romania	40 31 406 8991	valentin.tataru@ing.com
Russia	Dmitry Dolgin	Chief Economist, Russia and CIS	7 495 771 7994	dmitry.dolgin@ingbank.com
	Egor Fedorov	Senior Credit Analyst, Russia and CIS	7 495 755 5480	egor.fedorov@ingbank.com
Singapore	Rob Carnell	Chief Economist & Head of Research, Asia-Pacific	65 6232 6020	robert.carnell@asia.ing.com
	Prakash Sakpal	Economist, Asia	65 6232 6181	prakash.sakpal@asia.ing.com
Turkey	Muhammet Mercan	Chief Economist, Turkey	90 212 329 0751	muhammet.mercan@ingbank.com.tr

## Disclaimer

This publication has been prepared by the Economic and Financial Analysis Division of ING Bank N.V. (“ING”) solely for information purposes without regard to any particular user's investment objectives, financial situation, or means. ING forms part of ING Group (being for this purpose ING Group N.V. and its subsidiary and affiliated companies). The information in the publication is not an investment recommendation and it is not investment, legal or tax advice or an offer or solicitation to purchase or sell any financial instrument. Reasonable care has been taken to ensure that this publication is not untrue or misleading when published, but ING does not represent that it is accurate or complete. ING does not accept any liability for any direct, indirect or consequential loss arising from any use of this publication. Unless otherwise stated, any views, forecasts, or estimates are solely those of the author(s), as of the date of the publication and are subject to change without notice.

The distribution of this publication may be restricted by law or regulation in different jurisdictions and persons into whose possession this publication comes should inform themselves about, and observe, such restrictions.

Copyright and database rights protection exists in this report and it may not be reproduced, distributed or published by any person for any purpose without the prior express consent of ING. All rights are reserved. ING Bank N.V. is authorised by the Dutch Central Bank and supervised by the European Central Bank (ECB), the Dutch Central Bank (DNB) and the Dutch Authority for the Financial Markets (AFM). ING Bank N.V. is incorporated in the Netherlands (Trade Register no. 33031431 Amsterdam). In the United Kingdom this information is approved and/or communicated by ING Bank N.V., London Branch. ING Bank N.V., London Branch is subject to limited regulation by the Financial Conduct Authority (FCA). ING Bank N.V., London branch is registered in England (Registration number BR000341) at 8-10 Moorgate, London EC2 6DA. For US Investors: Any person wishing to discuss this report or effect transactions in any security discussed herein should contact ING Financial Markets LLC, which is a member of the NYSE, FINRA and SIPC and part of ING, and which has accepted responsibility for the distribution of this report in the United States under applicable requirements.

Additional information is available on request. For more information about ING Group, please visit <https://www.ing.com>.