

Delinquency trends and collection regulation update under the Consumer Finance Protection Bureau (CFPB)





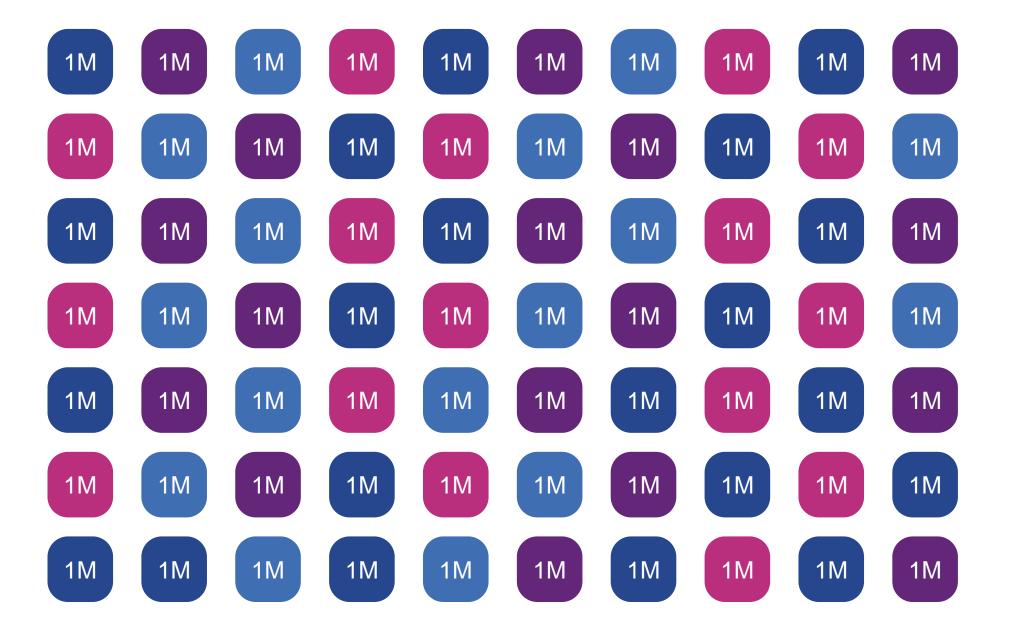
Introducing:

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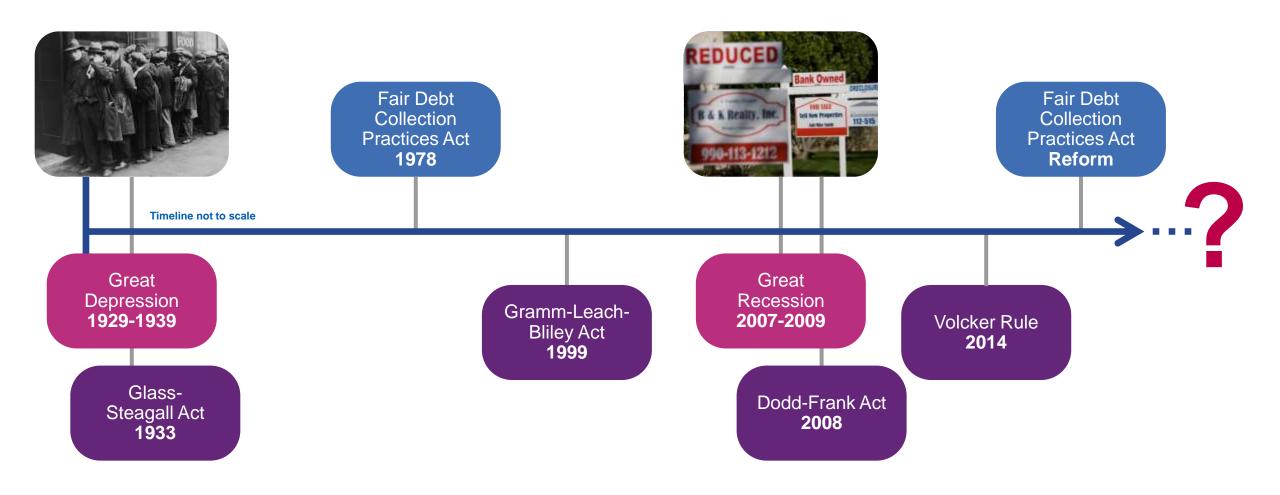






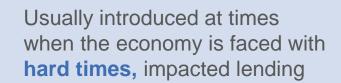


Timeline





Regulation cycle and potential targets





All these actions impact lending to consumers and drives delinquency

rates down or up, as a result

When **times get better**, deregulation is introduced to knock down the barriers established to protect

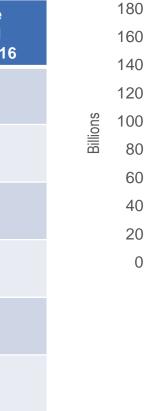


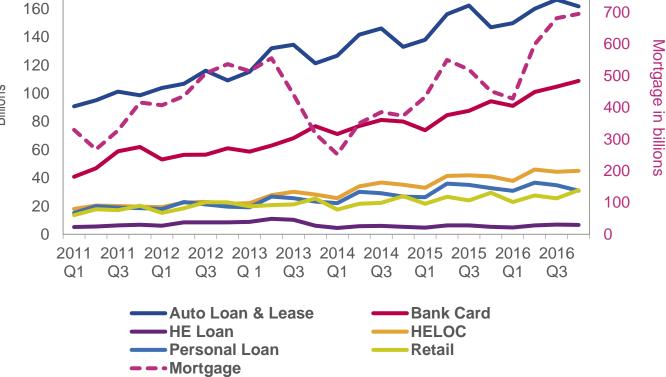
- Dodd-Frank Act
- Glass-Steagall Act
- Volcker Rule



Originations by lending product

	YOY change 4Q 2015 vs. 4Q 2016	Change 4Q 2011 vs. 4Q 2016
Mortgage	+54%	111%
Bankcard	+15%	166%
Auto loan and lease	+10%	78%
HELOC	+10%	150%
Retail	+6%	131%
Personal loan	-6%	104%



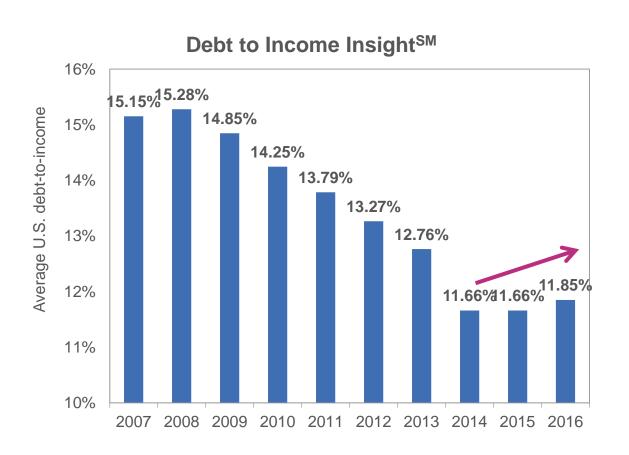


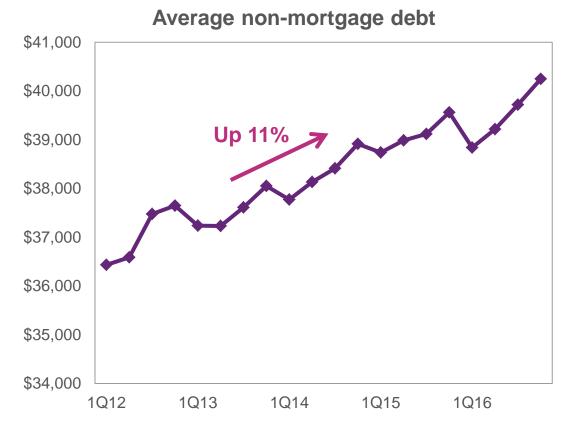
Source: Experian IntelliViewSM



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Debt-to-income and non-mortgage debt



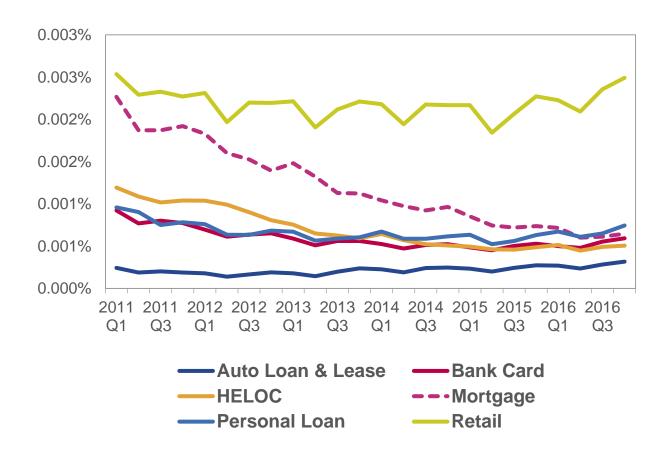




Delinquency by lending product 90-180 DPD

	90-180 DPD 4Q-2016
Mortgage	0.65%
Bankcard	1.49%
Auto loan and lease	0.32%
HELOC	0.51%
Retail	2.49%
Personal loan	0.74%

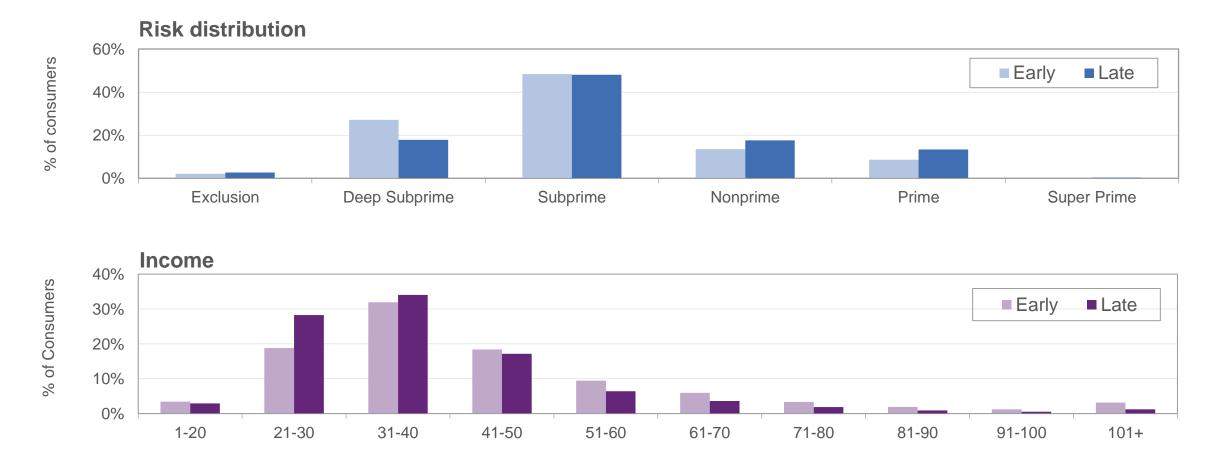
Source: Experian IntelliViewSM





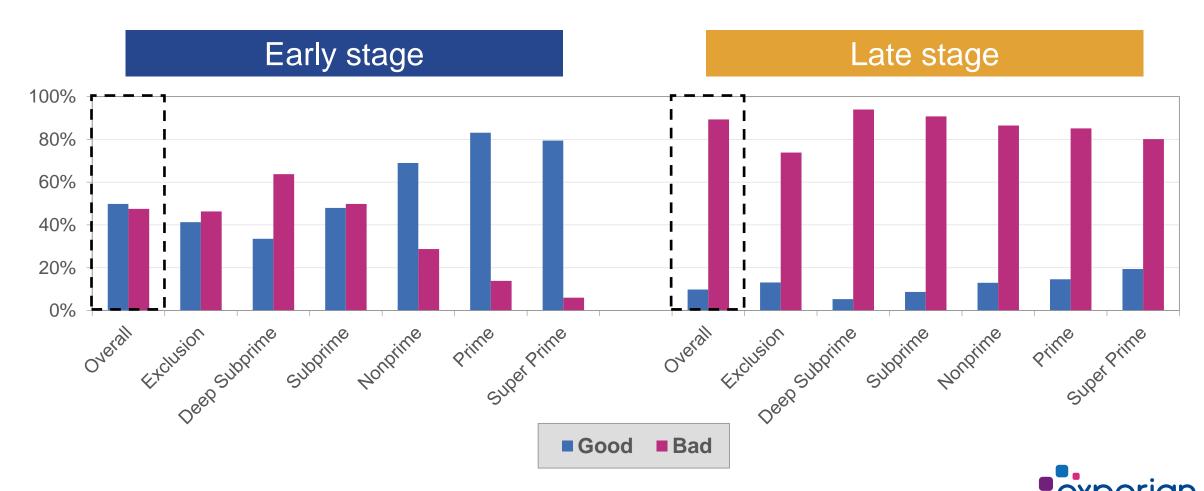
Ability vs. willingness to pay

Early and late stage delinquency by risk tier



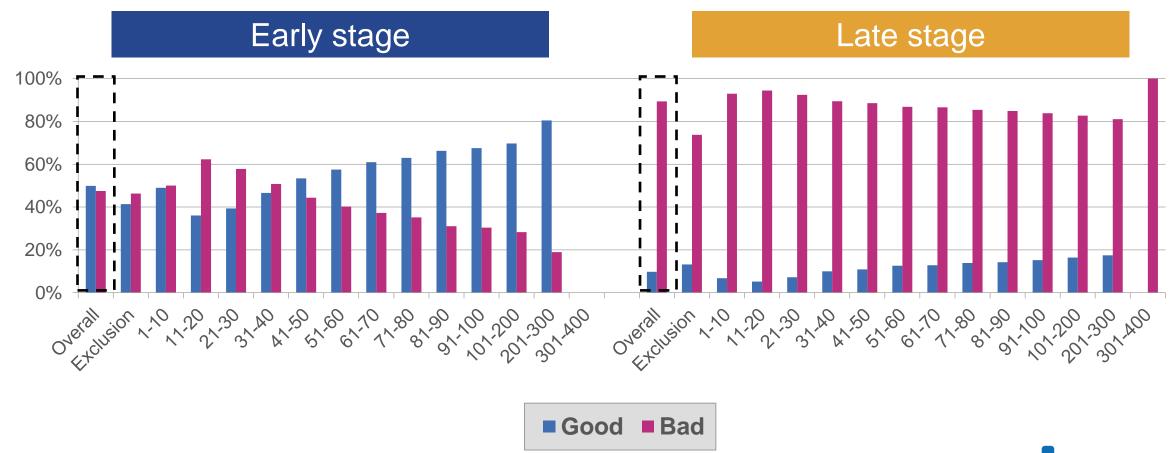


Ability vs. willingness to pay by risk tier Early and late stage



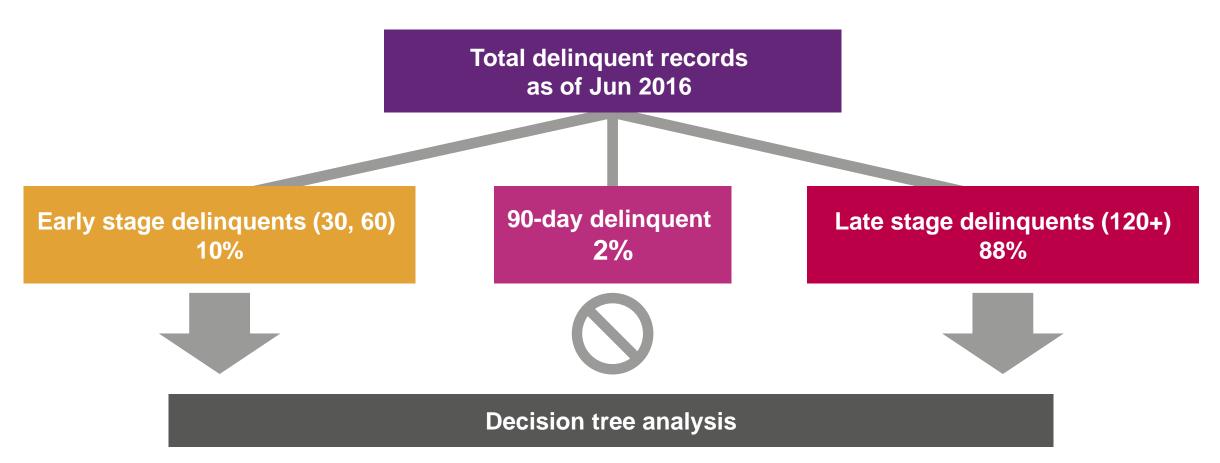
Ability vs. willingness to pay by income

Early and late stage



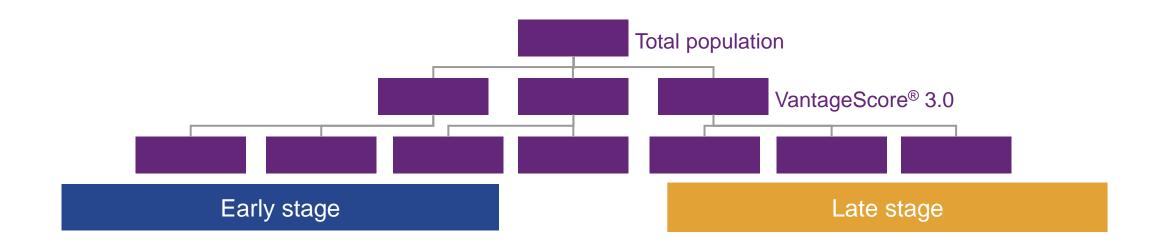


CHAID analysis design





Decision tree



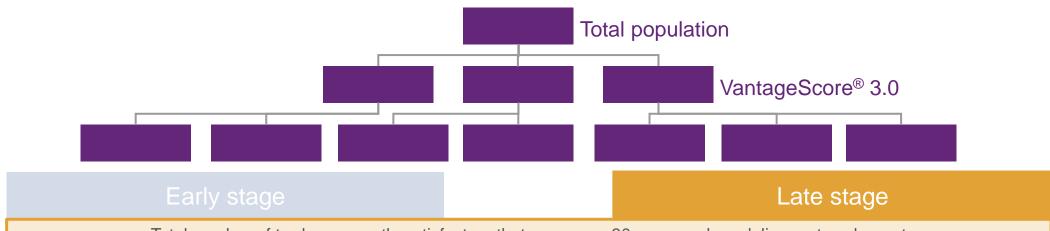


Decision tree





Decision tree



- Total number of trades presently satisfactory that were ever 30 or more days delinquent or derogatory
- Total credit amount on unsatisfied derogatory trades
- Worst present status on a trade
- Number of months since the most recent derogatory on trades
- Number of months since the most recent charge-off
- Number of months since the oldest 60 days delinquency on trades
- Number of months since the oldest derogatory occurrence on trades
- Number of months since the most recent 60 days or more delinquency or derogatory
- Number of months since the most recent 90 days or more delinquency or derogatory
- Number of months since the most recent derogatory on trades



CHAID analysis Early stage

	Risk Level —						
	High	Average	Low average	Low	Total		
Bad % with ind	87.8%	54.5%	28.5%	0.0%	47.3%		
Good / bad ratio	0.13	0.75	2.42	N/A	1.06		
% of total population	22.8%	38.3%	22.6%	16.3%			
% of total good	5.2%	31.1%	31.1%	32.6%			
% of total bad	42.2%	44.2%	13.6%	0.0%			

			Account status 6 months later in December 2016					
Account			Current	30	60	90	120+	Charge-off
status as of June 2016	Early	30	Good	Good	Bad	Bad	Bad	Bad
	stage	60	Good	Good	Ind	Bad	Bad	Bad



CHAID analysis

Late stage

	Risk Level						
	High	Average	Low average	Low	Total		
Bad % with ind	96.9%	92.0%	88.3%	37.7%	89.4%		
Good / bad ratio	0.02	0.08	0.12	1.60	0.11		
% of total population	46.7%	28.9	16.3%	8.0%			
% of total good	10.9%	21.3%	18.3%	49.5%			
% of total bad	50.7%	29.8%	16.2%	3.4%			

			Account status 6 months later in December 2016					
Account			Current	30	60	90	120+	Charge-off
status as of June 2016	Early stage	120*	Good	Good	Good	Ind	Bad	Bad
		Charge-off	Good	Good	Good	Ind	Ind	Bad



What might deregulation mean

Impact to credit market

- Large reform would require Congressional approval
- No more big banks, separating commercial and investment
 - Positive impacts:
 - Loan growth
 - Consumer confidence and spending increases
 - Increase earnings of financial institutions with rate increases and steeper yield curves
 - Rise in interest rates

Negative impacts:

- Weaken capital, liquidity, and resolution standards
- Weakening of creditworthiness
- Increase consumer debt to income ratios
- Increase consumer delinquencies





Customer Centricity in Collections

Edwin de Buck

Tribe Lead Center of Expertise Collections DBNL



Edwin de Buck





Tribe Lead CoE Collections, ING Domestic Banking, The Netherlands









Center of Expertise Collections ING The Netherlands



SPECIAL SERVICING RETAIL NL

> € 100 BILLION

MORTGAGES

CONSUMER LOANS, CREDIT CARDS, CURRENT ACCOUNTS

SMALL & MEDIUM ENTERPRISES



Mission



Empowering people to stay a step ahead in life and in business....







Collections: Finding the Optimum





Pillars of Customer Centricity



Customer / Relationship driven

Sustainable Solutions

Change of Behaviour

Intrinsically Motivation

Willingness and Ability

The right Action at the right Time for the right Customer



Operating Model of Customer Centricity



Customer Journey (End-to-End)

Segmentation & Differentiation (Data)

System & Work instructions (Process)

Education, Training and Motivation (Collector)

Customer Journey and Feedback Loop (Continuously Improvement)



Tools for Customer Centricity



Emotion Curve & Moments of Truth

Closed Loop Customer Feedback

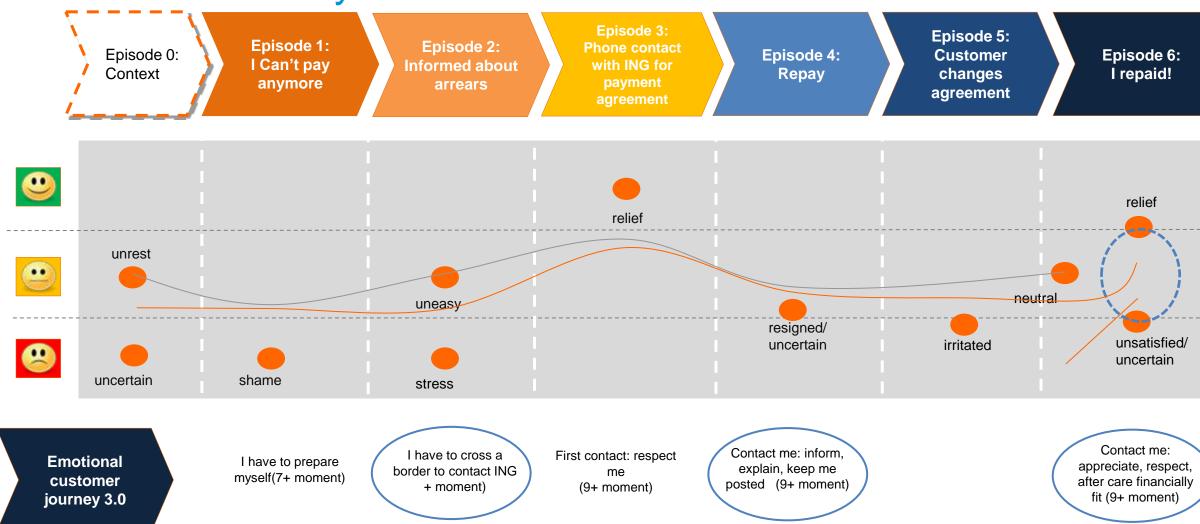
Customer Experience Improvement Cycle (CEIC)

Continuously Improvement

Agile Way of Working



Customer Journey: Emotion Curve & Moments of Truth





Closed Loop Customer Feedback Loop: Objectives



Voice of the Customer

Training and Coaching of Collectors

Improve Customer Journey



Customer Experience Improvement Cycle (CEIC)





Continuous Improvement: Small and Large Circle











Questions and answers

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