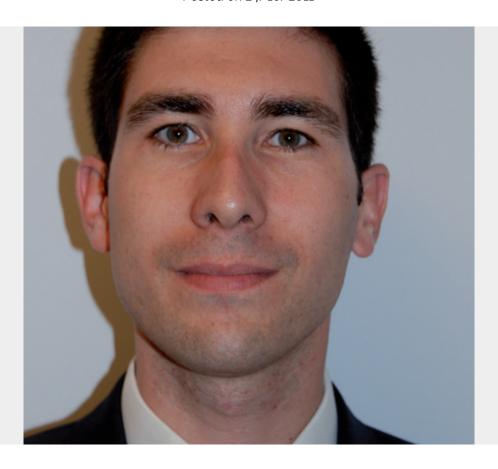
## RESTRUCTURING AND INNOVATING A WAY OUT OF THE CRISIS - ING DIRECT

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ING Direct is one of Europe's fastest-growing banks but its structure is changing in the face of continuing sector challenges, says Francisco Javier Ramírez Arbués

ING Direct es uno de los bancos con mayor crecimiento en Europa, pero su estructura está cambiando para adaptarse al nuevo entorno del sector. Como Director de Asesoría Jurídica y Vicepresidente, Francisco Javier Ramírez Arbués supervisa la provisión de asesoramiento legal a todos los departamentos del banco, al Consejo y al CEO. Su papel se centra cada vez más en la gestión de riesgos y el cumplimiento normativo.

As the Head of Legal and a Vice President (VP) of ING Direct España, Francisco Javier Ramírez Arbués oversees the provision of legal advice to all departments of the bank, to the Board and CEO.

It is a role that is seeing greater focus on risk management and compliance, as the bank looks to focus on its core activities, he says.

"The current trend within ING is perhaps counter to that seen in many other business sectors in that we are actually undoing much of the international spread and product diversification of the past decade."

The aim, he says, is to concentrate on core markets and to reduce the bank's complexity, in part to ensure that business and regulatory risks are more closely managed.

Dutch-based ING provides banking, investment, life insurance and retirement services. ING Direct is the biggest direct bank in the world and a leader in the Spanish market. It has over 23.9 million clients of which 2.2 million are in Spain. In 2008, at the height of the financial crisis, ING however received €10bn State Aid from the Dutch Government, under the terms of which it has had to restructure, including separating its banking and insurance arms.

Earlier this year it sold its Latin American insurance business to Colombia-based GrupoSura, and is in negotiations to sell its US ING Direct operation to Capital One.

"Given all that has happened in the European banking sector we have learnt that bigger is not always better. The strategy of ING in a world of crisis has meant that we have had to look at things a bit differently and to approach clients in a new way," says Ramírez Arbués.

As a VP of ING Direct he contributes to the development of the bank's business strategy and acts as Secretary to ING subsidiaries in Spain. Ramírez Arbués began his legal career with Ernst & Young before joining the Corporate Department at Garrigues. He left that firm after four years to take up the position of Head of Legal at ING Direct where he now leads a team of six.

"The remit of the legal team encompasses all of the public law, regulatory, corporate, consumer, e-commerce and data protection issues in Spain. ING recognises the need to have strong legal teams and a lot of internal control, but across the bank there is now a greater focus on ensuring procedural formalities which means more of a focus on compliance. At the same time, legal teams need to be, not only open-minded, but also part of the business."

Ramírez Arbués feels that it is important that the team's skills reflect not only the strategy of the bank but also the industry as a whole, and is now a member of the ING Leadership School Committee, in charge of developing a leadership culture within the organisation.

"Budgetary control is an area of inevitable emphasis and greater internal scrutiny means that we have had to look more closely at where we spend our own money. When we select outside counsel what we are now looking for is expertise in financial regulation and the markets, flexibility and international experience."

Looking ahead, he sees the likelihood of further regulation and scrutiny of financial institutions. "This will undoubtedly affect ING and it means we need to be more co-ordinated in terms of product management and innovation and to increase our interaction with clients through social media and other new communication channels."

At the group level he predicts a continuing focus on key markets and the further split of its banking and insurance activities, and for ING Direct España a recurring focus on giving clients value for money.

"The key differentiators of the bank are its capacity to think creatively, to deliver on promises and to pay higher rates of interest. But this can only be achieved if we are able to maintain our focus on efficiency and that requires very hands-on management."

Francisco Javier Ramírez Arbués is the Head of Legal and vice-President of ING Direct España.