



ING Bank N.V.

(Incorporated in The Netherlands with its statutory seat in Amsterdam)

Supplement to the Registration Document dated 21 March 2025

This Supplement (the “**Supplement**”) constitutes a supplement for the purpose of Regulation (EU) 2017/1129, as amended (the “**Prospectus Regulation**”) and is supplemental to, and should be read in conjunction with, the registration document dated 21 March 2025 as supplemented by the supplements dated 6 May 2025 and 31 July 2025 (the “**Registration Document**”) of ING Bank N.V. (the “**Issuer**”). The Registration Document is incorporated by reference in other prospectuses of the Issuer, or forms part of any prospectus of the Issuer consisting of separate documents within the meaning of the Prospectus Regulation, in respect of securities described in such other prospectuses or constituent parts thereof, and as of the date of this Supplement relates to the base prospectuses consisting of separate documents in relation to the Issuer’s (i) €70,000,000,000 Debt Issuance Programme dated 21 March 2025, (ii) €25,000,000,000 Global Issuance Programme for the Issuance of Medium Term Notes and Inflation Linked Notes dated 21 March 2025, (iii) €25,000,000,000 Global Issuance Programme for the Issuance of Reference Asset Linked Notes and Fund Linked Warrants dated 21 March 2025, (iv) Certificates and Warrants Programme dated 21 March 2025, (v) €30,000,000,000 Hard and Soft Bullet Covered Bonds Programme dated 21 March 2025, (vi) €45,000,000,000 Soft Bullet 2 Covered Bonds Programme dated 21 March 2025 and (vii) €30,000,000,000 Soft Bullet Covered Bonds Programme dated 21 March 2025, in each case, and its supplement(s) (if any). This Supplement supplements the Registration Document and any such prospectus consisting of separate documents.

The registration document dated 21 March 2025 has been approved by the Netherlands Authority for the Financial Markets (the “**AFM**”) on 21 March 2025.

This Supplement has been approved by the AFM on 31 October 2025 in its capacity as competent authority for the purposes of the Prospectus Regulation and relevant implementing measures in the Netherlands and published in electronic form on the Issuer’s website under <https://www.ingmarkets.com/downloads/debt-issuance-programme>.

Terms used but not defined in this Supplement have the meanings ascribed to them in the Registration Document. To the extent that there is any inconsistency between (a) any statement in this Supplement or any statement incorporated by reference into the Registration Document by this Supplement and (b) any other statement in or incorporated by reference in the Registration Document, the statements in (a) above will prevail.

In accordance with Article 23(2) of the Prospectus Regulation, in the event of non-exempt offers of securities to the public, investors who have already agreed to purchase or subscribe for securities issued or to be issued by the Issuer before this Supplement was published have the right, exercisable within three working days after the publication of this Supplement, to withdraw their acceptances until, and including 5 November 2025, save if before the publication of this Supplement the offer period has already closed or the securities have already been delivered, whichever occurs first. Investors may contact the relevant financial intermediary if they wish to exercise their right of withdrawal.

The accuracy of the information contained in this Supplement does not fall within the scope of examination by the AFM under the Prospectus Regulation. The AFM only approves this Supplement as meeting the standards of completeness, comprehensibility and consistency

imposed by the Prospectus Regulation. Such approval should not be considered as an endorsement of the Issuer that is the subject of this Supplement.

The Issuer accepts responsibility for the information contained in this Supplement. To the best of the knowledge of the Issuer the information contained in this Supplement is in accordance with the facts and makes no omission likely to affect the import of such information.

INTRODUCTION

No person has been authorised to give any information or to make any representation not contained in or incorporated by reference into the Registration Document and this Supplement and the Issuer takes no responsibility for, and can provide no assurance as to the reliability of, information that any other person may give.

Neither the delivery of this Supplement nor the Registration Document shall in any circumstances imply that the information contained in such Registration Document and herein concerning the Issuer is correct at any time subsequent to 31 July 2025 (in the case of the Registration Document) or the date hereof (in the case of this Supplement).

The distribution of the Registration Document and this Supplement and the offer of sale of any securities of the Issuer may be restricted by law in certain jurisdictions. Persons into whose possession the Registration Document and/or this Supplement or any securities of the Issuer come must inform themselves about, and observe, any such restrictions.

RECENT DEVELOPMENTS AND INFORMATION INCORPORATED BY REFERENCE

On 1 August 2025, ING Group published a press release entitled “EBA stress test confirms ING’s resilient capital position” (the “**Stress Test Press Release**”). On 26 September 2025, ING Group published a press release entitled “Update on ING’s exit from the Russian market” (the “**Russia Update Press Release**”). On 23 October 2025, ING Group published a press release entitled “ING announces changes to Executive Board and Management Board Banking” (the “**Executive and Management Board Press Release**”). On 29 October 2025, ING Group published a press release entitled “ING to appoint Ida Lerner as chief financial officer” (the “**CFO Appointment Press Release**”). On 30 October 2025, ING Group published a press release entitled “ING completes share buyback and announces new distribution programme of up to €1.6 billion” (the “**Shareholder Distribution Press Release**”). On 30 October 2025, ING Group published a press release entitled “ING posts 3Q2025 net result of €1,787 million, with strong growth in fee income and customer lending” (the “**Q3 Press Release**”). On 30 October 2025, ING Group published a press release entitled “ING Group 2025 SREP process completed” (the “**SREP Process Press Release**”, and together with the Stress Test Press Release, the Russia Update Press Release, the Executive and Management Board Press Release, the CFO Appointment Press Release, the Shareholder Distribution Press Release and the Q3 Press Release, the “**Press Releases**”). The Q3 Press Release contains, among other things, the condensed consolidated unaudited results of ING Group as at, and for the three month period and nine month period ended, 30 September 2025. For information about recent developments in the banking business of ING Group, which is conducted substantially through ING Bank N.V. and its consolidated group, during this period, see the Q3 Press Release. Copies of the Press Releases have been filed with the AFM and, by virtue of and in accordance with this Supplement, are incorporated by reference in, and form part of, the Registration Document.

Unless otherwise indicated, any references to websites or uniform resource locators (“**URLs**”) contained in the Press Releases are deemed inactive textual references and are included for information purposes only. The contents of any such website or URL shall not by virtue of this Supplement form part of, or be deemed to be incorporated into, the Registration Document, unless otherwise indicated.

Please note, however, that the consolidated operations of the Issuer, while materially the same, are not identical with the reported financial and statistical information on a segment basis for the banking business of ING Group as described in the Q3 Press Release, because the financial and statistical information reported by ING Group also contains certain financial items incurred solely at the level of ING Group (on a standalone basis) which are therefore not included in the consolidated operations of the Issuer (being a wholly-owned subsidiary of ING Group). Despite the incorporation by reference of one or more press releases published by it, ING Group is not responsible for the preparation of the Registration Document.

Finally, the Issuer has been informed about certain significant new factors in respect of legal proceedings for which it wishes to update the section entitled “*General Information – Litigation*” in the Registration Document in the manner set out herein.

MODIFICATIONS TO THE REGISTRATION DOCUMENT

1. *The following new items (k) through (q) shall be inserted in the section entitled “Documents Incorporated by Reference” on page 29 of the Registration Document:*

(k)	the press release published by ING Group on 1 Augustus 2025 entitled “EBA stress test confirms ING’s resilient capital position” (which can be obtained here)	In full
(l)	the press release published by ING Group on 26 September 2025 entitled “Update on ING’s exit from the Russian market” (which can be obtained here)	In full
(m)	the press release published by ING Group on 23 October 2025 entitled “ING announces changes to Executive Board and Management Board Banking” (which can be obtained here)	In full
(n)	the press release published by ING Group on 29 October 2025 entitled “ING to appoint Ida Lerner as chief financial officer” (which can be obtained here)	In full
(o)	the press release published by ING Group on 30 October 2025 entitled “ING completes share buyback and announces new distribution programme of up to €1.6 billion” (which can be obtained here)	In full
(p)	the press release published by ING Group on 30 October 2025 entitled “ING posts 3Q2025 net result of €1,787 million, with strong growth in fee income and customer lending” (which can be obtained here)	In full
(q)	the press release published by ING Group on 30 October 2025 entitled “ING Group 2025 SREP process completed” (which can be obtained here)	In full

2. *The paragraph entitled “Certain Consumer Credit Products” in the section entitled “General Information – Litigation” beginning on page 85 of the Registration Document shall be deleted and restated as follows (with the underlined wording being added):*

Certain Consumer Credit Products: In October 2021, ING announced that it would offer compensation to its Dutch retail customers in connection with certain revolving consumer loans with variable interest rates that allegedly did not sufficiently follow market rates. This announcement was made in response to several rulings by the Dutch Institute for Financial Disputes (*Kifid*) regarding similar products at other banks. ING has recognized a provision of EUR 180 million in 2021 for compensation and costs in connection with this matter. On 22

December 2021, ING announced that it reached an agreement with the Dutch Consumers' Association (*Consumentenbond*) on the compensation methodology for revolving credits. Based on a Kifid ruling regarding similar products, ING has amended its previously announced compensation scheme by also compensating interest on interest. In the third quarter of 2022, ING increased its provision for this matter by EUR 75 million. In the fourth quarter of 2022, ING and the Dutch Consumers' Association reached an agreement on the compensation of customers who have had an overdraft facility or a revolving credit card with a variable interest rate. ING has started compensating such customers in line with Kifid rulings about revolving credits including 'interest-on-interest'-effect in these cases. Timelines for compensation vary depending on customer and product segmentation and are dependent on the availability of data. In 2024 the compensation process was expedited. ING substantially finalized the compensation process in the first half of 2025, with a spill-over to the third quarter of 2025 for after-care in individual cases. ING has reached out to its customers with respect to the Kifid ruling, to also compensate amounts under EUR 50. The compensation process is still ongoing and may take until Q1 2026. Kifid recently confirmed ING's calculation methodology in relation to older consumer credits, where there is no relevant data available to determine the start delta and in relation to the interest-on-interest effect.

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