THIRD SUPPLEMENT DATED 30 OCTOBER 2026
TO THE REGISTRATION DOCUMENT DATED 11 MARCH 2026

# ING Bank N.V.

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

## Supplement to the Registration Document dated 11 March 2026

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 11 March 2026 as supplemented by the supplements dated 1 May 2026 and 31 July 2026 (the "**Registration Document**") of ING Bank N.V. (the "**Issuer**"). The Registration Document 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 11 March 2026, (ii) €25,000,000,000 Global Issuance Programme for the Issuance of Medium Term Notes and Inflation Linked Notes dated 11 March 2026, (iii) €25,000,000,000 Global Issuance Programme for the Issuance of Reference Asset Linked Notes and Fund Linked Warrants dated 11 March 2026, (iv) Certificates and Warrants Programme dated 11 March 2026, (v) €30,000,000,000 Hard and Soft Bullet Covered Bonds Programme dated 11 March 2026, (vi) €45,000,000,000 Soft Bullet 2 Covered Bonds Programme dated 11 March 2026 and (vii) €30,000,000,000 Soft Bullet Covered Bonds Programme dated 11 March 2026, 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 11 March 2026 has been approved by the Netherlands Authority for the Financial Markets (the "**AFM**") on 11 March 2026.

This Supplement has been approved by the AFM on 30 October 2026 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 4 November 2026, 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 2026 (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 18 August 2026, ING Group published a press release entitled "ING reduces its stake in TMBThanachart Bank" (the "**Stake Reduction Press Release**"). On 25 August 2026, ING Group published a press release entitled "ING announces change in Supervisory Board" (the "**Supervisory Board Press Release**"). On 27 October 2026, ING Group published a press release entitled "ING completes share buyback programme" (the "**Buyback Press Release**"). On 28 October 2026, ING Group published a press release entitled "ING Group 2026 SREP process completed" (the "**SREP Process Press Release**"). On 29 October 2026, ING Group published a press release entitled "ING shows continued commercial momentum in 3Q2026 and is well on track to deliver on 2026 outlook" (the "**Q3 Press Release**"). On 29 October 2026, ING Group published a press release entitled "ING announces new distribution programme of up to €1.9 billion" (the "**New Distribution Programme Press Release**", and together with the Stake Reduction Press Release, the Supervisory Board Press Release, the Buyback Press Release, the SREP Process Press Release and the Q3 Press Release, the "**Press Releases**"). The Q3 Press Release contains, among other things, the unaudited condensed consolidated interim financial statements of ING Group as at, and for the three month period and nine month period ended, 30 September 2026. 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 (r) through (w) shall be inserted in the section entitled "Documents Incorporated by Reference" on page 29 of the Registration Document:*

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| (r) | the press release published by ING Group on 18 August 2026 entitled "ING reduces its stake in TMBThanachart Bank" (which can be obtained here) | In full |
| (s) | the press release published by ING Group on 25 August 2026 entitled "ING announces change in Supervisory Board" (which can be obtained here) | In full |
| (t) | the press release published by ING Group on 27 October 2026 entitled "ING completes share buyback programme" (which can be obtained here) | In full |
| (u) | the press release published by ING Group on 28 October 2026 entitled "ING Group 2026 SREP process completed" (which can be obtained here) | In full |
| (v) | the press release published by ING Group on 29 October 2026 entitled "ING shows continued commercial momentum in 3Q2026 and is well on track to deliver on 2026 outlook" (which can be obtained here) | In full |
| (w) | the press release published by ING Group on 29 October 2026 entitled "ING announces new distribution programme of up to €1.9 billion" (which can be obtained here) | In full |

2. *The sentence "In august 2026, the Amsterdam court of appeal issued a ruling on document disclosure, in which it ordered ING to ask certain of its regulators whether they would consent to the disclosure of certain supervision-related communication between ING and these regulators. The court deferred its decision on other documents to later stages of the proceedings." shall be included in the paragraph entitled "Litigation by investors" in the section entitled "General Information – Litigation" beginning on page 88 of the Registration Document and therefore the aforementioned paragraph shall be deleted and restated as follows (with the underlined wording being added):*

**Litigation by investors**: In February and March 2024, ING and certain (former) board members were served with a writ of summons for litigation in The Netherlands on behalf of investors who claim to have suffered financial losses in connection with ING's disclosures on historic shortcomings in its financial economic crime policies, related risk management and control systems, the investigation by and settlement with the Dutch authorities in 2018 and related risks for ING. ING does not agree with the allegations and will defend itself against these and the claimed damages of EUR 587 million. In November 2025, the Amsterdam district court rejected all claims by the investors. In February 2026, the investors filed an appeal with the Amsterdam court of appeal against ING only, dropping the claim against the (former) board members. ING is

defending itself in these appeal proceedings which are still in the initial stages. In August 2026, the Amsterdam court of appeal issued a ruling on document disclosure, in which it ordered ING to ask certain of its regulators whether they would consent to the disclosure of certain supervision-related communication between ING and these regulators. The court deferred its decision on other documents to later stages of the proceedings. Separately, but relating to the same matters, in July 2024 another group of investors claiming to have suffered financial losses requested disclosure of certain ING documents and to question witnesses. The court issued a decision on the request in May 2025 where it rejected the entirety of the request made by these investors. These investors may decide to pursue further legal action. ING follows IFRS rules for taking legal provisions and would disclose material amounts in this regard if and when applicable – which currently is not the case.

3. *The sentence "As of July 2026, eight lawsuits have been finalized in favour of ING Bank Türkiye with the Turkish Supreme Court's verdict, which are likely to be precedent decisions for the other files." shall be deleted and replaced by "As of October 2026, eight lawsuits have been finalized in favour of ING Bank Türkiye with the Turkish Supreme Court's verdict, which are likely to be precedent decisions for the other files." in the paragraph entitled "Claims regarding accounts with predecessors of ING Bank Türkiye" in the section entitled "General Information – Litigation" beginning on page 88 of the Registration Document and therefore the aforementioned paragraph shall be deleted and restated as follows (with the underlined wording being added):*

   **Claims regarding accounts with predecessors of ING Bank Türkiye**: ING Bank Türkiye has received numerous claims from (former) customers of legal predecessors of ING Bank Türkiye. The claims are based on offshore accounts held with these banks, which banks were seized by the Savings Deposit Insurance Fund ("**SDIF**") prior to the acquisition of ING Bank Türkiye in 2007 from OYAK. Pursuant to the acquisition contract, ING Bank Türkiye can claim compensation from SDIF if a court orders ING Bank Türkiye to pay amounts to the offshore account holders. SDIF has made payments to ING Bank Türkiye pursuant to such compensation requests, but filed various lawsuits to receive those amounts back. In April 2022 the Turkish Supreme Court decided that the prescription period for the offshore account holders' compensation claims starts on the transfer date of the account holders to the offshore accounts.

   In 2024 SDIF initiated enforcement procedures against ING Bank Türkiye, based on the decision in April 2022 by the Turkish Supreme Court referred to above. SDIF alleges that this decision means that ING Bank Türkiye has to return certain payments made by SDIF regarding the offshore depositors' receivables cases, as the statute of limitations had already expired.

   Additionally, ING Bank Türkiye has initiated enforcement proceedings against SDIF regarding accumulated receivables that SDIF has either partially or completely failed to pay.

   As of October 2026, eight lawsuits have been finalized in favour of ING Bank Türkiye with the Turkish Supreme Court's verdict, which are likely to be precedent decisions for the other files. At this moment it is not possible to assess the outcome of these procedures nor to provide an estimate of the (potential) financial effect of these claims.

4. *The sentence "In the second quarter of 2026 the CJEU issued several judgments in Polish cases concerning Swiss franc loans." shall be deleted and replaced by "In 2026 the CJEU issued several judgments in Polish cases concerning Swiss franc loans." in the paragraph entitled "Claims regarding mortgage loans in Swiss franc in Poland" in the section entitled "General Information – Litigation" beginning on page 88 of the Registration Document and therefore the aforementioned paragraph shall be deleted and restated as follows:*

   **Claims regarding mortgage loans in Swiss franc in Poland**: ING Poland is a defendant in several lawsuits concerning Swiss franc mortgage loans, where customers allege unfair exchange rate clauses. In October 2021, ING Poland began offering settlements to borrowers in accordance with a proposal from the Polish Financial Supervision Authority.

In 2023, the CJEU ruled that banks cannot claim remuneration after a Swiss franc loan agreement is declared invalid, while consumers may seek reimbursement of payments and interest. In April 2024, the Polish Supreme Court confirmed that if the exchange rate mechanism is invalid, the entire agreement may be unenforceable. ING has recorded a portfolio provision.

In June 2025, the CJEU questioned the compatibility of the widely applied two-claims theory with EU law, indicating that both parties' claims should be considered in a single proceeding under the balance theory. In January 2026, the CJEU confirmed that banks may use set-off in Swiss franc disputes, enabling both parties' claims to be resolved in a single proceeding.

In 2026 the CJEU issued several judgments in Polish cases concerning Swiss franc loans. All these judgments were favorable to the banks and confirmed that consumer protection cannot lead to depriving banks of the right to recover the capital paid out. The Court has consistently confirmed that the settlement of the consequences of the invalidity of a contract should take into account the rights of both parties, and consumer protection cannot lead to a disproportionate and unfair result.

5. *The sentences "In March 2025, Milieudefensie started legal proceedings at the Court in Amsterdam against ING by serving the writ of summons. ING will defend its science-based climate approach in court and submitted its statement of defence in February 2026." shall be deleted and replaced by "In March 2025, Milieudefensie started legal proceedings at the Court in Amsterdam against ING. In September 2026, the Court declared the case admissible. The Court has asked the parties to submit a second round of written statements, after which the Court plans to hold a hearing on the merits in mid-2027." in the paragraph entitled "Climate Litigation" in the section entitled "General Information – Litigation" beginning on page 88 of the Registration Document and therefore the aforementioned paragraph shall be deleted and restated as follows (with the underlined wording being added):*

**Climate litigation**: In January 2024, Friends of the Earth Netherlands (*Milieudefensie*) announced that it holds ING liable for alleged contribution to climate change and threatened to initiate legal proceedings against ING. In March 2025, Milieudefensie started legal proceedings at the Court in Amsterdam against ING. In September 2026, the Court declared the case admissible. The Court has asked the parties to submit a second round of written statements, after which the Court plans to hold a hearing on the merits in mid-2027.

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