SECOND SUPPLEMENT DATED 31 JULY 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 supplement dated 1 May 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 31 July 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 5 August 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 1 May 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 30 July 2026, the Issuer published its Interim Financial Report containing its unaudited condensed consolidated interim financial statements as at, and for the six month period ended, 30 June 2026 (the "**ING Bank Interim Financial Report**"). A copy of the ING Bank Interim Financial Report has been filed with the AFM and the information included in the ING Bank Interim Financial Report, by virtue of and in accordance with this Supplement, is incorporated by reference in, and forms part of, the Registration Document.

On 7 June 2026, ING Group published a press release entitled "ING to appoint Andrea Cesaroni as chief risk officer" (the "**CRO Appointment Press Release**"). On 10 June 2026, ING Group published a press release entitled "ING rolls out global subscription banking model" (the "**Global Subscription Banking Model Press Release**"). On 12 June 2026, ING Group published a press release entitled "ING reduces its stake in TMBThanachart Bank" (the "**Stake Reduction Press Release**"). On 15 June 2026, ING Group published a press release entitled "ING appoints Hilde Garssen to the Management Board Banking" (the "**CHRO Appointment Press Release**"). On 18 June 2026, ING Group published a press release entitled "ING appoints Bob Bakker as head of Investor Relations" (the "**IRO Appointment Press Release**"). On 6 July 2026, ING Group published a press release entitled "ING accelerates growth in Private Banking with strategic investment in leading Spanish wealth manager Singular Bank" (the "**Singular Bank Press Release**"). On 30 July 2026, ING Group published a press release entitled "ING posts 2Q2026 net results of €1,947 million, reflecting accelerated growth in customer base and customer balances" (the "**Q2 Press Release**", and together with the CRO Appointment Press Release, Global Subscription Banking Model Press Release, Stake Reduction Press Release, CHRO Appointment Press Release, IRO Appointment Press Release and the Singular Bank Press Release, the "**Press Releases**"). The Q2 Press Release contains, among other things, the unaudited condensed consolidated interim financial statements of ING Group as at, and for the six month period ended, 30 June 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 Q2 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 Q2 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 (j) through (q) shall be inserted in the section entitled "Documents Incorporated by Reference" on page 29 of the Registration Document:*

(j)	the press release published by ING Group on 7 June 2026 entitled "ING to appoint Andrea Cesaroni as chief risk officer" (which can be obtained here)	In full
(k)	the press release published by ING Group on 10 June 2026 entitled "ING rolls out global subscription banking model" (which can be obtained here)	In full
(l)	the press release published by ING Group on 12 June 2026 entitled "ING reduces its stake in TMBThanachart Bank" (which can be obtained here)	In full
(m)	the press release published by ING Group on 15 June 2026 entitled "ING appoints Hilde Garssen to the Management Board Banking" (which can be obtained here)	In full
(n)	the press release published by ING Group on 18 June 2026 entitled "ING appoints Bob Bakker as head of Investor Relations" (which can be obtained here)	In full
(o)	the press release published by ING Group on 6 July 2026 entitled "ING accelerates growth in Private Banking with strategic investment in leading Spanish wealth manager Singular Bank" (which can be obtained here)	In full
(p)	the press release published by ING Group on 30 July 2026 entitled "ING posts 2Q2026 net results of €1,947 million, reflecting accelerated growth in customer base and customer balances" (which can be obtained here)	In full
(q)	the Interim Financial Report containing ING Bank's unaudited condensed consolidated interim financial statements as at, and for the six month period ended, 30 June 2026, as published by ING Bank on 30 July 2026 (which can be obtained here)	In full

2. *The section entitled "General Information – Significant or Material Adverse Change" on page 88 of the Registration Document shall be deleted and restated as follows (with the underlined wording being updated):*

"**Significant or Material Adverse Change**

At the date hereof, there has been no significant change in the financial position or performance of ING Bank N.V. and its consolidated subsidiaries since 30 June 2026.

At the date hereof, there has been no material adverse change in the prospects of ING Bank N.V. since 31 December 2025.".

3. *The sentence "In February 2025, ING and the (former) board members filed their statement of defence against the allegations and in November 2025, the court rejected all claims by the investors. In February 2026, the investors filed an appeal against this decision of the court." shall be deleted and replaced by "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 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. 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.

4. *The sentence "As of April 2026, four 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 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." 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 <u>July</u> 2026, <u>eight</u> 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.

5. *The paragraph entitled "Mortgage expenses claims" in the section entitled "General Information – Litigation" beginning on page 88 of the Registration Document shall be deleted in its entirety and restated as follows (with the underlined wording being added):*

Mortgage expenses claims: <u>Since 2017, ING Spain has faced claims and litigation regarding reimbursement of mortgage formalisation expenses. Courts have generally declared the relevant expense clauses null and ordered reimbursement of all or part of the costs. Between 2018 and 2024, the Spanish Supreme Court and the CJEU have clarified the allocation of notary, registration, agency, stamp duty and valuation costs, as well as the limitation period for exercising these claims, establishing that the 5 year period only begins when the specific clause is declared null by the Court, unless the bank can prove the customer previously was aware of the clause's unfairness.</u>

<u>Related to the same matter, ING Spain was also involved in three class actions alongside other Spanish banks. One was settled, one was withdrawn by the claimant association, and in the third case the National Court ruled that consumers cannot seek compensation as intended by the association. This decision has been appealed before the Supreme Court and is not yet final.</u>

A provision has been established and <u>is</u> adjusted <u>as</u> appropriate.

6. *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 shall be deleted in its entirety and restated as follows (with the underlined wording being added):*

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

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

<u>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.</u>

In the second quarter of 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.

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