

**First Supplement dated 4 February 2026  
to the Base Prospectus dated 13 May 2025**

This document ("**First Supplement**") constitutes a supplement for the purposes of Art. 8(10) and 23(1) of Regulation (EU) 2017/1129 of the European Parliament and the Council of June 14, 2017, as amended ("**Prospectus Regulation**") to the base prospectus for securities relating to the EUR 20,000,000,000 debt issuance programme of ING-DiBa AG as issuer ("**Issuer**") for the issue of notes in bearer form ("**Notes**") and Mortgage Pfandbriefe (*Hypothekenpfandbriefe*) in bearer form ("**Pfandbriefe**" and, together with the Notes, "**Securities**", and each a "**Security**") in respect of non-equity securities within the meaning of Article 2(c) of the Prospectus Regulation ("**Base Prospectus**").



**ING-DiBa AG, Frankfurt am Main, Federal Republic of Germany  
EUR 20,000,000,000  
Debt Issuance Programme  
("Programme")**

The First Supplement is supplemental to, and should only be distributed and read together with, the Base Prospectus. Terms defined in the Base Prospectus have the same meaning when used in the First Supplement. To the extent that there is any inconsistency between (a) any statement in the First Supplement, and (b) any other statement in the Base Prospectus prior to the date of the First Supplement, the statements in the First Supplement will prevail.

The *Commission de Surveillance du Secteur Financier* ("**CSSF**") of the Grand Duchy of Luxembourg ("**Luxembourg**") in its capacity as competent authority under the Prospectus Regulation has approved the First Supplement. By approving the First Supplement, the CSSF gives no undertaking as to the economic and financial soundness of the operation or the quality or solvency of the Issuer.

The First Supplement will be published, together with the Base Prospectus and the documents incorporated by reference therein, in electronic form on the website of the Luxembourg Stock Exchange ([www.luxse.com](http://www.luxse.com)) and on the website of the Issuer ([www.ing.de/ueber-uns/unternehmen/investor-relations/investor-relations-en/](http://www.ing.de/ueber-uns/unternehmen/investor-relations/investor-relations-en/)).

The Issuer has requested the CSSF to provide the competent authority in the Federal Republic of Germany ("**Germany**") with a certificate of approval ("**Notification**") attesting that the First Supplement has been drawn up in accordance with the Prospectus Regulation. The Issuer may request the CSSF to provide competent authorities in additional Member States within the European Economic Area with a Notification.

The Issuer is solely responsible for the information given in the First Supplement. The Issuer hereby declares that, to the best of its knowledge, the information contained in the First Supplement for which it is responsible is in accordance with the facts and that the First Supplement makes no omission likely to affect its import.

No person has been authorised to give any information or to make any representation other than those contained in the Base Prospectus or the First Supplement in connection with the issue or sale of the Securities and, if given or made, such information or representation must not be relied upon as having been authorised by the Issuer, the Dealers or any of them.

The First Supplement does not constitute an offer of, or an invitation by or on behalf of the Issuer or the Dealers to subscribe for, or purchase, any Securities.

The Issuer announces the following changes regarding the Base Prospectus:

#### **SUPPLEMENTAL INFORMATION PERTAINING TO THE SECTION "PART B: RISK FACTORS"**

The risk factor "*I. Risks relating to the Issuer – 3. Liquidity risk*" shall be supplemented as follows:

- On page 18 of the Base Prospectus, the following additional sentence shall be inserted below the sentence "*(ix) Liquidity transformation risk*":

"(x) Refinancing risk"

- Below the section "*3.9 Liquidity transformation risk*" on page 20 of the Base Prospectus, the following new section shall be added:

#### **"3.10. Refinancing risk**

There is a risk of making losses due to a worsening of the Issuer's own refinancing ability at the liquidity and capital markets. This risk affects the Issuer's ability to maintain stable, cost-efficient access to wholesale and retail funding sources. A worsening in refinancing capability may increase funding costs, limit execution of planned funding programmes, and in extreme cases, restrict liquidity availability."

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