

**ING GROUP GLOBAL PROCEDURE ON
EXTERNAL
AUDITORS' INDEPENDENCE**

Info sheet

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| Objective: | Established to ensure the independence of ING Group's external auditor |
| Document owner: | Group Finance - Erwin Olijslager |
| Document type: | Procedure |
| Issued by: | Group Finance |
| Approved by: | ING's Audit Committee |
| Approval date: | 28 October 2025 |
| Target audience: | ING Groep N.V. |
| Effective date: | 1 June 2026 |
| Implementation: | - |
| Next review date: | 28 October 2028 |
| Document version: | Version 1.01 |
| Replaces: | ING Group Global Procedure on External Auditors' Independence version 1.01 |

Change history

| Version | Date | Author(s) | Changes |
|----------------|----------------|----------------------------|--|
| 1.01 | 1 January 2025 | Bert Visser / Alper Kurgin | Replaces ING Group Policy on External Auditors' Independence |
| 1.02 | 1 January 2026 | Bert Visser / Alper Kurgin | Replaces version 1.01 |
| 1.03 | 1 June 2026 | Bert Visser / Alper Kurgin | Editorial updates to Appendix C and Appendix D |

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Chapter 1 Introduction

This Global Procedure (hereafter: Procedure) is supplementary to and should be interpreted in conjunction with the Audit Committee Charter of ING Groep N.V. (hereafter: ING or ING Group).

1.1 Objective is to ensure the independence of ING Group's external auditor

This Procedure is established to ensure the independence of ING Group's¹ external auditor (hereafter: Auditor or External Auditor), both in fact and in appearance. The Auditor is not independent if the Auditor, or a reasonable and objective person with knowledge of all relevant facts and circumstances, would conclude that the Auditor is not capable of exercising objective and impartial judgment on all issues encompassed within the Auditor's engagement.

By means of this Procedure, ING Group wishes to avoid the Auditor providing services that amongst others:

- create mutual or conflicting interests between the Auditor and ING Group;
- place the Auditor in the position of auditing its own work (self-review threat);
- result in the Auditor acting in a management or ING Employee role or undertaking management responsibility;
- place the Auditor in the position of serving in an advocacy role for ING Group.
- in principle the Auditor will only be allowed to provide audit and audit-related services as referred to in Appendices C and D to ING under this procedure.

Appendix A includes some definitions used in this Procedure and Appendix B contains more detailed information regarding certain, more technical items of this Procedure.

1.2 Scope of this Procedure

This Procedure applies to ING, its subsidiaries, related entities (where ING has control and includes related entities as defined under Dutch law) and affiliates (where ING has control, see A.1 of the Appendix for detailed definition), which includes SEC and IESBA PIE affiliates (hereafter: ING Group). This Procedure describes minimum requirements within ING Group. Local requirements should be applied in case they are stricter than the requirements as outlined in this Procedure. This Procedure is intended to satisfy the requirements of applicable laws and regulations².

¹ As defined in paragraph 1.2.

² This includes the Dutch Corporate Governance Code as amended or updated from time to time, the auditor independence rules of the U.S. Securities and Exchange Commission (hereafter: SEC), the applicable provisions of the Sarbanes-Oxley Act, and the releases of the U.S. Public Company Accounting Oversight Board (hereafter: PCAOB). the 'Wet toezicht accountantsorganisaties' (Wta, Audit firms supervision Act'), the 'Besluit toezicht accountantsorganisaties', the rules issued by the Nederlandse Beroepsorganisatie van Accountants (NBA) such as Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten' (ViO, Code of Ethics for Professional Accountants), IESBA Code of Ethics and EU regulation such as Regulation (EU) No 537/2014 on specific requirements regarding statutory audit of public-interest entities, the (local legislation and regulations implementing the) rules regarding assurance on sustainability reporting set out in the Corporate Sustainability Reporting Directive."

Chapter 2 Roles and responsibilities

2.1 Responsibility of the Audit Committee

The Audit Committee of the Supervisory Board of ING (hereafter: Audit Committee) annually evaluates the independence and functioning of, and the developments in the relationship with the External Auditor and informs the Supervisory Board of its findings and proposed measures. The Audit Committee pre-approves the services (audit and non-audit) to be provided by the External Auditor to ING Group in accordance with this Procedure. The Audit Committee approves this Procedure every three years, unless changes in law and regulation require an earlier approval. Group Finance yearly assesses whether the Procedure requires any updates based on changes in laws and regulation and will inform the Audit Committee about the outcome of this assessment.³

Nothing in this Procedure shall be interpreted as a delegation to management of the Audit Committee's responsibilities under applicable laws and regulations.

2.2 Responsibility of the Auditor

The Auditor has to maintain a quality management system compliant with the SEC's, EU, IESBA PIE and Dutch auditor independence rules, that ensures that the independence of the firm, its partners, all employees and associated entities participating in the engagement will not be impaired. In general, the Auditor and certain partners, principals, shareholders and professional employees of the Auditor are amongst others prohibited from having (1) together with their immediate family members or close financial relations, any direct or material indirect financial interest in ING Group (including any loan to or from ING Group, subject to certain exceptions) or (2) any direct or material indirect business relationship with ING Group or with persons associated with the ING Group in a decision-making capacity, such as ING Group's officers, directors, or beneficial owners (known through reasonable inquiry) with significant influence over the entity under audit. The relationships described in this chapter do not include a relationship in which the Auditor or covered person in the firm (in which the External Auditor practices and its network firms or component firms outside the network) provides permitted professional services to an audit client or is a consumer in the ordinary course of business, in each case, during the audit and professional engagement period unless the relationship would result in a prohibited business relationship.

To support the independence process, the Auditor is required to, prior to accepting its initial engagement and thereafter at least annually in the cases of items 1 to 3:

1. disclose to the Audit Committee in writing all relationships between the Auditor or any affiliates where ING has control and ING Group or persons in financial reporting oversight roles at ING Group, or persons associated with ING Group in a decision-making capacity, such as ING Group's officers, directors or beneficial owners (known through reasonable inquiry) with significant influence over the entity under audit, that, in the Auditors' professional judgment, may reasonably be thought to bear on independence;
2. discuss with the Audit Committee the potential effects of the relationships described in (1)

³ See also Charter of the Supervisory Board of ING Groep N.V. and ING Bank N.V.

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- above on the independence of the Auditor and document the substance of such discussions;
3. confirm in writing that, in the Auditors' professional judgment, they are independent of ING Group within the meaning of the applicable laws and regulations;
 4. confirm in engagement letters that performance of the work will not impair independence;
 5. satisfy the Audit Committee that the Auditor has in place comprehensive written internal policies and procedures to ensure adherence, world-wide, to the ING Group Global Procedure on External Auditors' Independence and other independence requirements, including robust monitoring and communications;
 6. provide regular communication and confirmation to the Audit Committee on independence;
 7. utilize the assigned tracking numbers and type of service in all fee billings and correspondence;
 8. maintain registration and good standing with the PCAOB, AFM and any other relevant accounting regulatory body;
 9. review their partner rotation plan; and
 10. correct any deficiency in the independence of any partner or employee as promptly as possible after becoming aware thereof.

Chapter 3 Appointment of the Auditor

3.1 Appointment, reappointment, performance, functioning, dismissal and the remuneration of the Auditor

Taking into account applicable laws and regulation, the Audit Committee shall make recommendations to the Supervisory Board regarding the appointment, reappointment, performance, functioning, dismissal and the remuneration of the Auditor of ING Group.⁴ The Supervisory Board shall discuss such recommendations and will once every four years, or more often when appropriate, inform the General Shareholders' Meeting of ING Group as to the main conclusions regarding the nomination and the outcome of the evaluation and selection process of the Auditor⁵.

3.2 Audit partner rotation

After providing audit services to ING Group for a maximum period of five consecutive years, the lead (or coordinating) audit partner (having primary responsibility for the audit) and the reviewing (or concurring) audit partner (or the Engagement Quality Reviewer⁶) shall be replaced by another partner of the Auditor and observe a five-year time-out period. The Audit Committee shall make recommendations to the Supervisory Board regarding the replacement of the lead audit partner.

After providing services to ING Group for a maximum period of seven consecutive years a time-out period of at least three years is required for:

- an audit engagement team partner who provided more than ten hours of audit, review or attest services in connection with the consolidated financial statements of ING;
- an audit partner who is in charge of any essential task with regard to the execution of the audit of the annual accounts or review of interim accounts (including, for example, serving as lead partner in connection with the audit or review of the financial statements of a subsidiary of ING whose assets or total revenues constitute 20% or more of ING Group's respective consolidated assets or revenues).

3.3 Audit firm rotation

The Auditor shall (fully cooperate in order for ING to be able to) comply with mandatory audit firm rotation obligations pursuant to Dutch law and any other applicable law or regulation requiring audit firm rotation.

⁴ The rules for appointing the Auditor have been established in the Supervisory Board and Audit Committee Charters.

⁵ Affiliates of ING that qualify as public interest companies ("organisatie van openbaar belang" as referred to in article 2:393 Dutch Civil Code) are required to notify the AFM in advance of the appointment of the Auditor.

⁶ Pursuant to Rule 2-01 of the SEC's Regulation S-X.

Chapter 4 Pre-approval and monitoring of services

4.1 Audit Committee pre-approval procedure

The Audit Committee is required to pre-approve the engagement for audit, audit-related and non-audit services of the Auditor requested by ING Group. The Audit Committee is required to separately pre-approve audit, audit-related services and other non-audit services to be performed by the Auditor in order to assure that the performance of such services would not impair the Auditors' independence from ING Group.

The Audit Committee will consider for all services, either generally pre-approved or individually pre-approved, whether these services are consistent with all applicable laws and regulations. The Audit Committee will also consider whether the Auditor is best positioned to provide the most effective and efficient service. In addition, the Audit Committee is also mindful of the proportion of aggregate fees for audit, audit-related and other non-audit services in deciding whether to pre-approve any such services.

Appendices C and D to this Procedure describe the services per type that have been generally pre-approved by the Audit Committee. Any proposed engagement of the Auditor either shall have been generally pre-approved by reference to the detailed types of services as listed in Appendices C and D or shall be individually pre-approved by the Audit Committee at a subsequent date and, if applicable, also pre-approved by the Supervisory Board.

The Audit Committee will pre-approve the budget for each category of service of pre-approved audit, audit-related services and other non-audit services. Any proposed services of the Auditor exceeding the budgeted amount per type of service will require specific remuneration pre-approval by the Audit Committee.

This Procedure does not delegate the Audit Committee's responsibilities to pre-approve audit, audit-related or other non-audit services performed by the Auditor. However, all proposed services shall be submitted in advance to the Group Controller of ING. In cases of doubt, the Audit Committee will determine for such services whether these services are included in the general pre-approved lists as outlined in the Appendices or should be individually pre-approved. For the proposed services that have to be individually pre-approved by the Audit Committee, the Group Controller of ING will advise in advance ING's CFO on whether such services are consistent with all applicable laws and regulations. After review by the CFO, the Audit Committee will be asked for its pre-approval.

The Audit Committee has delegated its authority to pre-approve any audit, audit-related or other non-audit services to the Chair of the Audit Committee. In the event of any pre-approval by the Chair of the Audit Committee, the Chair of the Audit Committee will present the pre-approved service or services at the next scheduled Audit Committee meeting.

The Audit Committee shall evidence its pre-approval by resolution of the Audit Committee or through exercise of delegated authority by the Chair of the Audit Committee in accordance with this Procedure.

The Audit Committee may revise the lists of pre-approved services from time to time, based on subsequent determinations or changes in the requirements of applicable laws and regulations.

4.2 Permitted Services

The Auditor can only provide to ING Group the services included in Appendices C and D. The only exceptions to this rule are services that are ongoing as of 1 January 2026 and i) permitted pursuant to the pre-existing versions of the ING Group Global Procedure on External Auditors' Independence or ii) specifically pre-approved by the Audit Committee or the Chair of the Audit Committee (pursuant to delegated authority).

Services listed in Appendix E are prohibited.

4.3 Monitoring of services and fees billed

The Auditor will provide the Audit Committee with a full overview of all services provided to ING Group, including related fees⁷ and supported by sufficiently detailed information. This overview will be evaluated every second and fourth quarter by the Audit Committee.

Throughout the year, ING Group Finance will monitor the realisation of the pre-approved budgeted amounts. Unused amounts in any pre-approved budgets will not be carried forward to the next financial year.

ING does not allow any type of contingent fees.

In accordance with its Charter, the Audit Committee shall annually evaluate the performance of the Auditor, the scope of the audit(s) to be performed, and the independence of the Auditor, including considering whether the Auditors' quality controls are adequate.

ING is required to adhere to the regulatory fee cap for non-audit services. This fee cap is limited to 70% of the average of the fees paid in the last three consecutive financial years for the audit⁸ of OOBs (Organisaties van Openbaar Belang), if relevant, its Dutch parents and the Dutch undertakings under their control. In order to adhere to this requirement Group Finance monitors all fees billed from the Auditor, provided that Group Finance's monitoring of all fees billed from the Auditor shall not relieve the Audit Committee of its direct responsibilities relating to the compensation, retention and oversight of the Auditor.

4.4 Services for joint ventures and investment funds and/or similar investment vehicles

For ING Group's joint ventures and for investment funds that are part of ING Group or similar investment vehicles, the Audit Committee has given a general pre-approval for the services listed in Appendices C and D. The Audit Committee must be informed for all other services rendered by the Auditor to joint ventures, investment funds, or similar investment vehicles not listed in Appendices C and D. Informing the Audit Committee should not be read or understood to replace the approval of the audit committee of the investment fund or joint venture partner. Where relevant, the Auditor shall ask pre-approval of that audit committee.

⁷ Based on services performed within the financial year.

⁸ Article 4 of EU regulation 537/2014.

Chapter 5 Hiring of staff with connections to the Auditor

Hiring of (current or former) employees of the Auditor must meet the requirements as set out in each of the paragraphs 5.1 and 5.3 – 5.5, i.e. such hiring must meet the cumulative conditions.

5.1 No hiring by ING Group of current employees of the Auditor

ING will not, at any time during the audit and professional engagement period for ING Group, hire at any level (including appointment as a member of the Supervisory or Executive Board), any current partner, director, principal, shareholder or professional employee of the Auditor.

5.2 No hiring by ING Group of close family members of covered persons

ING will not, at any time during the audit and professional engagement period for ING Group, hire at any level (including appointment as a member of the Supervisory or Executive Board), any close family member of any covered person in an accounting role or financial reporting oversight role.

5.3 Hiring by ING Group of former employees of the Auditor (Dutch regulations)

ING will not, at any time during the audit and professional engagement period for ING Group, hire at any level (including appointment as a member of the Supervisory or Executive Board), any former partner, director, principal, shareholder or professional employee of the Auditor in an accounting role or financial reporting oversight role, unless:

- (i) in case of a key assurance partner involved in an audit or assurance engagement for ING Group,
 - a. at least two years have lapsed since that partner ceased being the key assurance partner for ING Group, and
 - b. at least one year has lapsed since the partner has left the Auditor or a network firm and being hired by ING; or
- (ii) in case of a (former) member of the assurance team or a (former) partner or an accountant having the authority to conduct a statutory audit, at least one year has lapsed since the person's involvement in the assurance engagement has ceased, the person has left the Auditor or a network firm and the person being hired by ING.

In addition, and in any case, ING will not hire any person in an accounting role or a financial reporting oversight role if significant ties remain between the Auditor or a network firm and the person being hired. Significant ties exist where (a) the person is involved in the business or professional activities of the Auditor or a network firm or (b) is entitled to financial benefits that were not awarded under pre-existing policies and are material to the Auditor or a network firm.

5.4 Hiring by ING Group of former covered persons (US regulations)

ING will not, at any time during the audit and professional engagement period for ING Group, hire at any level (including appointment as a member of the Supervisory or Executive Board), any former partner, director, principal, shareholder or professional employee of the Auditor in a financial reporting oversight role, unless:

- (i) at the time such person accepts the role, such person was not a member of the audit engagement team of the Auditor (or another audit firm that was at that time the auditor of ING Group) during the one year period preceding the date that audit procedures

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- commenced for the fiscal period that included the date of initial employment of the audit engagement team member by ING Group or;
- (ii) such person (other than a lead partner or concurring partner) provided ten or fewer hours of audit, review and attest services to ING Group during the relevant period. Each financial year's audit procedures are deemed to commence on the date following the date of filing with the SEC of the prior year's Annual Report on Form 20-F (Appendix B2).

5.5 Other conditions for hiring by ING Group of former employees of Auditor (ING specific rules)

ING will not, at any time during the audit and professional engagement period for ING Group, hire at any level (including appointment as a member of the Supervisory or Executive Board), any former partner, principal, shareholder or professional employee of the Auditor in a non-accounting or non-financial reporting oversight role, unless such person:

- (i) does not influence the Auditor's operations or financial policies,
- (ii) has no capital balances in the Auditor,
- (iii) has no financial arrangements with the Auditor (unless otherwise permitted under Regulation S-X Rule 2-01(c)(2)(iii)(A)(3) and,
- (iv) at the time of accepting the role, was not a member of the audit engagement team of the Auditor (or another audit firm that was at that time the auditor of ING Group) during the 12 months preceding the starting date of the employment.

5.6 Exception procedure regarding hiring by ING Group of employees from the Auditor

In exceptional circumstances hiring of persons falling under the above definitions including the exceptions in Appendix B.2 is possible subject to Audit Committee pre-approval in accordance with applicable laws and regulations. Approval should be requested through the ING Group Auditor Independence Desk and is subject to pre-approval from the Group Controller.

5.7 Exception procedure regarding hiring of employees by the Auditor from ING Group

The Auditor will not hire or associate with any former director, officer or employee of ING Group, whether in such individual's capacity as a partner, principal, shareholder or professional employee of the Auditor, unless such individual does not participate in, and is not in a position to influence, the audit of the financial statements of ING Group during a two year period or covering any period during which he or she was employed by or associated with ING Group, whichever is longer.

5.8 Scope of hiring restrictions

This chapter applies to Auditor's group and local firms.

Chapter 6 Effective date and grandfathering

This Procedure was approved by the Audit Committee on 28 October 2025. This new version of the Procedure is effective as of 1 January 2026 and replaces the version effective from 1 January 2025.

Provided the services were pre-approved pursuant to the pre-existing versions of the ING Group Procedure on External Auditors' Independence, (or ING Group Policy on External Auditor Independence) the existence of the services on 1 January 2026 will not be deemed to impair the Auditors' independence and engagements for services entered into pursuant to the pre-existing procedure or policy and in progress on 1 January 2026 will be grandfathered, when they are permitted under the current Procedure.

This Procedure will be published on the intranet and the internet site of ING and will be communicated to ING senior management.

For further clarification and assistance for the implementation of this Procedure the Group Controller of ING should be contacted.

Appendix A: Definitions

A.1 Affiliate

An "affiliate" means, with respect to any entity under audit:

- (i) an entity that has control over the entity under audit, or over which the entity under audit has control, including the entity under audit's parents and subsidiaries;
- (ii) an entity that is under common control with the entity under audit, including the entity under audit's parents and subsidiaries, when the entity and the entity under audit are each material to the controlling entity;
- (iii) an entity over which the audit client has significant influence, unless the entity is not material to the audit client;
- (iv) an entity that has significant influence over the audit client, unless the audit client is not material to the entity; or
- (v) each entity in the Investment Company Complex of which the entity under audit forms a part, including, with respect to ING Group, any investment fund managed by any member of the ING Group (hereinafter: Investment Fund); or
- (vi) Plan sponsors of single-employer-sponsored employee benefit plan SEC audit clients that are subject to ERISA (29 CFR 2509.75-9).
- (vii) Participating employers of a multiple or multi-employer employee benefit plan.

A.2 Audit and professional engagement period

The "audit and professional engagement period" includes both:

- The period covered by any financial statements being audited or reviewed (the "audit period"); and
- The period of the engagement to audit or review ING Group's financial statements or to prepare a report filed with the SEC and other relevant regulators. (the "professional engagement period").

The professional engagement period begins when the Auditor either signs an initial engagement letter (or other agreement to review or audit a client's financial statements) or begins audit, review, or attest procedures, whichever is earlier.

The professional engagement period ends when ING Group or the Auditor notifies the SEC and other relevant regulators that ING Group is no longer the Auditor's audit client.

A.3 Close family members

"Close family members" are defined as a person's spouse, spousal equivalent, parent, dependent, nondependent child, and sibling. In line with SEC restrictions, this term also includes step-parents and step-children, but does not include a non-dependent brother-in-law, sister-in-law, father-in-law, or mother-in-law.

A.4 Close financial relations

"Close financial relations" are defined as a close personal relationship with someone:

- a. that is financially dependent of the Auditor and certain partners, principals, shareholders and professional employees of the Auditor or with whom the Auditor and certain partners, principals, shareholders and professional employees of the Auditor has a joint household;
- b. to which the financial position of the Auditor and certain partners, principals, shareholders and professional employees of the Auditor directly or indirectly is related;
- c. for which the Auditor and certain partners, principals, shareholders and professional employees of the Auditor has financial control or to which financial advice is provided.

A.5 Control

The term "control" (including the terms controlling, controlled by and under common control with) means the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a person, whether through the ownership of voting shares, by contract, or otherwise.

A.6 Financial reporting oversight role

A financial reporting oversight role (or "FROR") means a role in which a person exercises or is in a position to exercise influence over the contents of the financial statements or anyone who prepares those statements. Persons in a FROR would include a person who is;

- a member of the board of directors or similar management or governing body;
- Chief executive officer;
- President;
- Chief financial officer;
- Chief operating officer;
- General counsel;
- Chief accounting officer;
- Controller;
- Director of internal audit;
- Director of financial reporting;
- Treasurer;
- Director of internal controls compliance (or similar managerial positions responsible for compliance under Section 404 of the Sarbanes-Oxley Act of 2002); or
- any equivalent position.

In applying the above definition, it should be noted that individuals serving in the above positions for a material subsidiary, material branch, or material business line of ING may⁹, depending on the facts and circumstances, be considered to be serving in a financial reporting oversight role.

A.7 Immediate family members

"Immediate family members" are defined as a person's spouse, spousal equivalent and dependents.

A.8 Investment Company Complex

An Investment Company Complex is defined in Rule 2-01(f)(14) of the SEC's Regulation S-X to include:

- (i) an investment company or its investment adviser or sponsor;
- (ii) an investment adviser or sponsor;
- (iii) any entity controlled by or controlling
 - an investment company, investment adviser or sponsor; or
 - an investment company's investment adviser or sponsor, provided that:
 - the entity and the investment company are each material to the investment adviser or sponsor; or
 - the entity is engaged in the business of providing administrative, custodian, underwriting, or transfer agent services to any investment company, investment adviser, or sponsor;
- (iv) any entity under common control with an investment company, investment adviser or sponsor, or an investment company's investment adviser or sponsor, or an entity as

⁹ Subject to agreement with ING Group Auditor Independence Desk

mentioned in (iii), provided that:

- the entity is an investment company or an investment advisor or sponsor, the investment company, investment advisor or sponsor and the entity are each material to the controlling entity; or
 - the entity is engaged in the business of providing administrative, custodian, underwriting, or transfer agent services to any investment company, investment adviser, or sponsor;
- (v) any entity over which such investment company, investment adviser or sponsor has significant influence, unless the entity is not material to such investment company, investment adviser or sponsor or such investment company, investment adviser or sponsor is not material to the entity that has significant influence over it; and
- (vi) any investment company (or entity that would be an investment company but for certain exclusions provided by the Investment Company Act of 1940) that has an investment adviser or sponsor referred to in the bullet points above.

ING is managing an Investment Fund when it controls the investment adviser or investment sponsor of such Investment Fund, or any other entity or trust that is engaged in the administration, custody, underwriting or transfer agency business in respect of such Investment Fund.

A.9 Related Entity

An entity that has any of the following relationships with ING:

- (i) an entity that has direct or indirect control over ING, if ING is material to such entity
- (ii) an entity with a direct financial interest in ING if that entity has significant influence over ING and the interest in ING is material to such entity;
- (iii) an entity over which ING has direct or indirect control;
- (iv) an entity in which ING, or an entity related to ING under (iii) above, has a direct financial interest that gives it significant influence over such entity and the interest is material to ING and its related entity in (iii); and
- (v) an entity which is under common control with ING (a "sister entity") if the sister entity and ING are both material to the entity that controls both ING and sister entity.

A.10 Covered persons

A covered person is:

- (i) a member of the audit engagement team ;
- (ii) the chain of command for the audit;
- (iii) a partner located in the office in which the Lead audit engagement partner practices in connection with an audit;
- (iv) A partner or managerial employee who provides 10 or more hours of non-audit services to an audit client in the period beginning on the date such services are first provided and ending on the date the audit report on the financial statements for the fiscal year during which those services are provided is signed, or any partner or managerial employee who expects to provide 10 or more hours of non-audit services to an audit client on a recurring basis. For such recurring engagements, the period for which independence is required ends when the entity ceases to be an audit client;
- (v) the immediate family and close financial relations of any of the above.

A.11 Key assurance partner

Key assurance partner means the lead auditor, the person conducting the concurring review of a pending assurance engagement or an auditor who is also responsible for reporting significant matters.

A.12 Assurance team

Assurance team includes:

- a) All members of the Engagement Team for the Assurance Engagement;
- b) All others within, or engaged by, the Member Firm who can directly influence the outcome of the Assurance Engagement, including:
 - i) Those who recommend the compensation of, or who provide direct supervisory, management or other oversight of the Assurance Engagement Partner in connection with the performance of the Assurance Engagement;
 - ii) Those who provide consultation regarding technical or industry specific issues, transactions or events for the Assurance Engagement; and
 - iii) Those who perform an Engagement Quality Review, or a review consistent with the objective of an Engagement Quality Review, for the Engagement.

Appendix B: Clarifications and information regarding technical items of this Procedure

B.1 Services for joint ventures and investment funds

In addition to services contracted for directly by the joint venture or investment fund, an audit firm may be considered to have provided services to ING Group if:

- ING Group contracts directly with the audit firm;
- the audit firm is contracted to provide the service by an unaffiliated third party but ING Group has the ability to direct, or does in fact direct, the third party to engage the audit firm or the scope and terms of that engagement;
- ING Group indemnifies the audit firm for losses or damages to third parties that the audit firm may suffer as a result of the engagement; or
- ING Group directly or indirectly (for example, by reimbursing a third party) pays or guarantees any portion of the audit firm's fees.

B.2 Hiring by ING Group of employees from the Auditor and vice versa

The reference to “partners, principals, shareholders or professional employees” in chapter 5 is a less technical reference to “covered persons”, which are defined to mean the following partners, principals, shareholders, and employees of an accounting firm: (i) the “audit engagement team”; (ii) the “chain of command”; (iii) any other partner, principal, shareholder, or managerial employee of the accounting firm who has provided ten or more hours of non-audit services to ING Group for the period beginning on the date such services are provided and ending on the date the accounting firm signs the report on the financial statements for the fiscal year during which those services are provided, or who expects to provide ten or more hours of non-audit services to ING Group on a recurring basis; and (iv) any other partner, principal, or shareholder from an “office” of the accounting firm in which the lead audit engagement partner primarily practices in connection with the audit.

“Chain of command” means all persons who: (i) supervise or have direct management responsibility for the audit, including at all successively senior levels through the accounting firm's chief executive; (ii) evaluate the performance or recommend the compensation of the audit engagement partner; or (iii) provide quality control or other oversight of the audit.

The exceptions referred to in chapter 5 may allow a former partner, director, principal, shareholder or professional employee of the Auditor to;

1. act in a role other than in an accounting role or financial reporting oversight role in ING;
2. act in a financial reporting oversight or accounting role at ING if such individual does not influence the Auditor's operations or financial policies and has no meaningful (financial) ties, capital balances or financial arrangements with the Auditor (other than certain fixed or immaterial compensation arrangements).

Appendix C: Pre-approved audit services

| Category | Service |
|----------|--|
| C1 | Annual audit of the consolidated annual accounts of ING Group and of the Parent Company Accounts of ING Group; |
| C2 | Annual audit required by applicable law of the consolidated annual accounts of ING Group's subsidiaries and the respective parent company accounts. |
| C3 | SOX procedures, annual audit of the consolidated financial statements of ING Group included in Form 20-F and other filings of ING Group for regulatory and supervisory purposes; |
| C4 | Review of interim (summary) financial statements and/or interim (summary) accounts for ING Group or ING Group's subsidiaries. |
| C5 | Attestation of management's reports on internal control over financial reporting*; |
| C6 | Audit, Assurance services and agreed upon procedures at the request of regulators or for regulatory purposes; |
| C7 | Comfort letters and other agreed-upon procedures for offering circulars, prospectuses and registration statements in connection with securities offerings*; and |
| C8 | Legally required annual assurance services of sustainability reporting for ING Group or ING Group's subsidiaries (possibly included in an integrated annual report).* |

* These services may only be considered as pre-approved audit (related) services when:

- (i) they concern:
 - (a) Engagements for auditing historical financial information;
 - (b) Engagements for reviewing historical financial information;
 - (c) Assurance engagements other than auditing or reviewing historical financial information; or
 - (d) Engagements for conducting agreed upon procedures concerning financial information;
 and
- (ii) the services are rendered for the benefit of external users or the Supervisory Board.

Appendix D: Pre-approved audit-related services

| Category | Service |
|----------|---|
| D1 | Financial statement audits of employee benefit plans*; |
| D2 | Audit on completion accounts (for disposal/liquidations) or merger accounts*; |
| D3 | Audits of acquired businesses (opening balance sheet audits)*; |
| D4 | Audit of carve-out financial statements (e.g. as defined in book 2 Dutch Civil Code)*; |
| D5 | Attest services not required by statute or regulation*; |
| D6 | Third party assurance, internal control evaluations (e.g. ISAE 3402/SSAE 16 or equivalent audits)*; |
| D7 | Agreed-upon or expanded audit procedures related to accounting records and procedures required to respond to or comply with financial, accounting or regulatory reporting matters (i.e. SOX, Basel, Solvency II)**; |
| D8 | Audit of Economic Capital;* and |
| D9 | Audit of Embedded Value*. |

* These services may only be considered as pre-approved audit (related) services when:

- (i) they concern:
 - (a) Engagements for auditing historical financial information;
 - (b) Engagements for reviewing historical financial information;
 - (c) Assurance engagements other than auditing or reviewing historical financial information; or
 - (d) Engagements for conducting agreed upon procedures concerning financial information;
 and
- (ii) the services are rendered for the benefit of external users or the Supervisory Board.

** when the service relates to OOBs and Dutch controlled undertakings, these services are only permissible inside the Netherlands if the agreed-upon services meet the definition of an audit service as defined in the ViO.

Appendix E: Prohibited services

The following list of prohibited services is based upon applicable rules of the SEC and the PCAOB, including the SEC's Regulation S-X Rule 2-01 and Section 3 ("Auditing and Related Professional Practice Standards") of the PCAOB Rules; reference should be made to all applicable rules in determining whether any proposed service falls within one of the categories listed below.

| Category | Service |
|----------|--|
| E1 | Bookkeeping or other services related to the accounting records or financial statements of ING Group; |
| E2 | Financial information systems design and implementation relating to the financial statements or accounting records, including: <ol style="list-style-type: none"> 1. Operating, hosting or supervising the operation of ING Group's information system or managing ING Group's local area network; or 2. designing or implementing any hardware or software system that aggregates source data underlying the financial statements or generates information that is significant to the financial statements or other financial information systems taken as a whole; |
| E3 | Appraisal or valuation ¹⁰ services, fairness opinions, and contribution-in-kind reports, including collateral valuations for financing arrangements where the Auditor is engaged by ING to value (or update valuations) supporting an existing or potential lending arrangement where ING is acting either in lender or borrower capacity; |
| E4 | Actuarial services involving the determination of amounts recorded in the financial statements and related accounts (other than assisting ING Group in understanding the methods, models, assumptions and inputs used in computing an amount); |
| E5 | Internal audit outsourcing services (e.g. relating to the internal accounting controls, financial systems or financial statements for ING Group); |
| E6 | Management functions, including acting, temporarily or permanently, as a director, officer or employee of ING Group, or performing any decision-making, supervisory or ongoing monitoring function for ING Group; |

¹⁰ Appraisal and valuation services include any process of valuing assets or liabilities. They include valuing (1) in-process research and development, (2) financial instruments, (3) assets and liabilities acquired in a merger and (4) real estate.

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| E7 | <p>Human resource services, including:</p> <ol style="list-style-type: none"> 1. searching for or seeking out prospective candidates for managerial, executive or director positions; 2. engaging in psychological testing or other formal testing or evaluation programs; 3. undertaking reference checks of prospective candidates for an executive or director position; 4. acting as a negotiator on ING Group's behalf, such as determining position, status or title, compensation, fringe benefits or other conditions of employment; or 5. recommending or advising ING Group to hire a specific candidate for a specific job, except that the Auditor may, upon request by ING Group, interview candidates and advise ING Group on the candidate's competence for financial accounting, administrative or control positions. |
| E8 | <p>Broker-dealer, investment adviser or investment banking services, including:</p> <ol style="list-style-type: none"> 1. acting as a broker-dealer (registered or unregistered), promoter, or underwriter, on behalf of ING Group; <ul style="list-style-type: none"> • making investment decisions on behalf of ING Group or otherwise having discretionary authority over ING Group's investments; 2. executing a transaction to buy or sell ING Group's investment; or <ul style="list-style-type: none"> • having custody of assets of ING Group, such as taking temporary possession of securities purchased by ING Group; 3. committing ING to the terms of a transaction; 4. consummating a transaction on behalf of ING; 5. negotiating on behalf of ING; and 6. acting as agent or intermediary for ING |

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| E9 | <p>Certain tax services, including:</p> <ol style="list-style-type: none"> 1. potentially abusive tax transactions i.e. any non-audit service to ING related to marketing, planning or opining in favour of: <ol style="list-style-type: none"> a. any transaction that is required to be disclosed to tax authorities under provisions of local law, including any “reportable transaction” under Section 301.6011-4 of the United States Federal Tax Regulations; b. a “confidential transaction” or a transaction that is offered to a taxpayer under conditions of confidentiality and for which the taxpayer has paid an advisor a fee; or c. an “aggressive tax position” or a transaction that was initially recommended, directly or indirectly, by the Auditor, a significant purpose of which is tax avoidance, unless the proposed tax treatment is at least more likely than not to be allowable under applicable tax laws. 2. services to individuals in a financial reporting oversight role, or an immediate family member¹¹ of these individuals, unless such person: <ol style="list-style-type: none"> a. is in such role solely because he serves as a member on the Supervisory Board, provided he is not a member of the Audit Committee; b. is in such role solely because of such person’s relationship to an affiliate of ING Groep N.V. whose financial statements are not material to ING Groep N.V.’s consolidated financial statements or are audited by another unaffiliated auditor; or c. was not in such role before a hiring, promotion or other change in employment event, and the tax services are provided pursuant to an engagement in process before such hiring, promotion or other change, and completed on or before 180 days thereafter. 3. representing ING Group before a tax court, district court or federal court; or 4. tax services for expatriates; |
| E10 | <p>Legal services, including services that, under circumstances in which the service is provided, could be provided only by someone licensed, admitted or otherwise qualified to practice law in the jurisdiction in which the service is provided;</p> |
| E11 | <p>Expert services unrelated to the audit, including providing an expert opinion or other expert service for ING Group or for ING Group’s legal representative, for the purpose of advocating ING Group’s interests in litigation or in a regulatory or administrative proceeding or investigation (other than(1) providing factual accounts, including testimony, of work performed or explaining the position taken or conclusions reached during the performance of any service performed for ING Group and (2) subject to audit committee pre-approval, tax compliance (e.g. preparation of original and amended tax returns, claims for refund and tax payment-planning) and tax planning and advice (e.g. assistance with tax audits and appeals, tax advice related to mergers and acquisitions, employee benefit plans and requests for rulings or technical advice from taxing authorities) services);</p> |

¹¹ “Immediate family member” is defined as a person’s spouse, spousal equivalent and dependents.

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| E12 | Forensic services; |
| E13 | Business risk consulting, including presenting business risk considerations to the board or others on behalf of the management; |
| E14 | SOX 404 implementation services, including: <ol style="list-style-type: none">1. project management office assistance;2. performing tests of controls on behalf of ING Group; or3. expressing any opinion on behalf of ING Group on the effectiveness of internal control over financial reporting; |
| E15 | Compliance related services; |
| E16 | Services relating to commercial activities of ING Group, in which decision-making by business management is (highly) dependent on the output of the Auditor; |
| E17 | Translation services (from Dutch into English and vice versa or from and into any other relevant language); |
| E18 | Provision by the Auditor of seconded staff to ING Group, where control over the seconded staff is effectively transferred to ING Group or where the seconded staff could otherwise be seen as acting as employees of ING Group; and |
| E19 | Any other service that by applicable laws or regulations is impermissible. |

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The following list of prohibited services is based upon applicable rules of the EU, including Regulation (EU) No 537/2014 article 5. Reference should be made to all applicable rules in determining whether any proposed service falls within one of the categories listed below.

| Category | Service |
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| E20 | tax services relating to: (i) preparation of tax forms; (ii) payroll tax; (iii) customs duties; (iv) identification of public subsidies and tax incentives unless support from the statutory auditor or the audit firm in respect of such services is required by law; (v) support regarding tax inspections by tax authorities unless support from the statutory auditor or the audit firm in respect of such inspections is required by law; (vi) calculation of direct and indirect tax and deferred tax; (vii) provision of tax advice; |
| E21 | services that involve playing any part in the management or decision-making of the audited entity; |
| E22 | bookkeeping and preparing accounting records and financial statements as well as preparing sustainability reporting; |
| E23 | payroll services; |
| E24 | designing and implementing internal control or risk management procedures related to the preparation and/or control of financial information or designing and implementing financial information technology systems; |
| E25 | valuation services, including valuations performed in connection with actuarial services or litigation support services; |
| E26 | (g) legal services, with respect to: (i) the provision of general counsel; (ii) negotiating on behalf of the audited entity; and (iii) acting in an advocacy role in the resolution of litigation; |
| E27 | (h) services related to the audited entity's internal audit function; |

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| E28 | (i) services linked to the financing, capital structure and allocation, and investment strategy of the audited entity, except providing assurance services in relation to the financial statements, such as the issuing of comfort letters in connection with prospectuses issued by the audited entity; |
| E29 | (j) promoting, dealing in, or underwriting shares in the audited entity; |
| E30 | (k) human resources services, with respect to: management in a position to exert significant influence over the preparation of the accounting records or financial statements which are the subject of the statutory audit, where such services involve: — searching for or seeking out candidates for such position; or — undertaking reference checks of candidates for such positions; (i) structuring the organisation design; and (ii) cost control |

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The following list of prohibited services is based upon applicable rules of the IESBA PIE. Reference should be made to all applicable rules in determining whether any proposed service falls within one of the categories listed below.

| Category | Service |
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| E31 | accounting and bookkeeping services; |
| E32 | administrative services that involve assisting clients with their routine or mechanical tasks within the normal course of operations; |
| E33 | valuation services that comprise the making of assumptions with regard to future developments, the application of appropriate methodologies and techniques and the combination of both to compute a certain value, or range of values, for an asset, a liability or for the whole or part of an entity; |
| E34 | tax services comprising: <ul style="list-style-type: none"> ▪ tax calculations for the purpose of preparing accounting entries. ▪ tax advisory services. ▪ tax planning services. ▪ tax services involving valuations. ▪ assistance in the resolution of tax disputes; |
| E35 | internal audit services that comprise: <ul style="list-style-type: none"> ▪ monitoring of internal control – reviewing controls, monitoring their operation and recommending improvements to them. ▪ examining financial and operating information by: <ul style="list-style-type: none"> - reviewing the means used to identify, measure, classify and report financial and operating information. - inquiring specifically into individual items including detailed testing of transactions, balances and procedures. ▪ reviewing the economy, efficiency and effectiveness of operating activities including non-financial activities of an entity. ▪ reviewing compliance with: <ul style="list-style-type: none"> - laws, regulations and other external requirements. - management policies, directives and other internal requirements; |
| E36 | litigation support services might include activities such as: <ul style="list-style-type: none"> ▪ assisting with document management and retrieval. ▪ acting as a witness, including an expert witness. ▪ calculating estimated damages or other amounts that might become receivable or payable as the result of litigation or other legal dispute. ▪ forensic or investigative services; |
| E37 | legal services defined as: <ul style="list-style-type: none"> ▪ providing legal advice. ▪ acting as general counsel. ▪ acting in an advocacy role; |

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| E38 | recruiting services that includes: <ul style="list-style-type: none">▪ developing a job description.▪ developing a process for identifying and selecting potential candidates.▪ searching for or seeking out candidates.▪ screening potential candidates for the role▪ determining employment terms and negotiating details, such as salary, hours and other compensation; |
| E39 | corporate finance services that comprise: <ul style="list-style-type: none">▪ assisting an audit client in developing corporate strategies.▪ identifying possible targets for the audit client to acquire.▪ advising on the potential purchase or disposal price of an asset.▪ assisting in finance raising transactions.▪ providing structuring advice.▪ providing advice on the structuring of a corporate finance transaction or on financing arrangements. |

This Procedure was approved on 28 October 2025.