

California Voluntary Carbon Market Disclosures Act (VCMMDA) Disclosure

ING Groep N.V. ('ING Group' or 'ING') makes the following disclosures to be responsive to the VCMMDA ("AB-1305"), which requires businesses to disclose key information if they do any of the following:

- Market or sell voluntary carbon offsets within the State of California;
- Purchase or use voluntary carbon offsets that makes claims regarding the achievement of net zero emissions, claims that the entity, related entity, or a product is "carbon neutral," or makes other claims implying the entity, related entity, or a product does not add net carbon dioxide or greenhouse gases to the climate or has made significant reductions to its carbon dioxide or greenhouse gas emissions; and
- Make claims regarding the achievement of net zero emissions, claims that the entity, a related or affiliated entity, or a product is "carbon neutral," or makes other claims implying the entity, related or affiliated entity, or a product does not add net carbon dioxide or greenhouse gases, as defined in Section 38505, to the climate or has made significant reductions to its carbon dioxide or greenhouse gas emissions.

The information provided below has been prepared and provided for the sole purpose of disclosure under Section 44475 et seq. of Division 26, Part 10 of the California Health and Safety Code, as added by AB-1305. A business entity that operates within California and makes claims as described in Section 44475.2 of AB-1305 is required to disclose on its website certain information regarding those claims. Because it is possible that AB-1305 may be construed to apply to ING, including its subsidiaries and affiliates, ING is making the disclosure required by Section 44475.2 of the VCMMDA.

For the purposes of Section 44475.2 of the VCDMA, carbon offsets are no longer purchased by ING and their use is no longer claimed. Carbon offsets may be used by ING's clients.

ING does not claim to be 'net zero' or 'climate neutral' for any operation or product; but reports its plans towards being net zero and steering its portfolio in line with its targets. For net-zero goals, extensive information about progress towards those goals and the methodologies used by ING are published, as well as further information on climate-related risk aspects.

ING reports on its efforts to aim to reach net zero in its own operations. Information on ING's own operations climate-related claims is available in the 2024 [ING Group Annual Report on form 20-F](#) (pages 28 and 31).

Data is collected from ING entities and consolidated in the published reports. Information on reporting methodologies and claims accuracy is also published.

Any commitments or targets disclosed by ING must be read together with the following notes. ING's targets are calculated based on the available data, the selected calculation methodologies, proxies and/or available scenarios. ING's commitments, targets, baselines,

calculation methodologies and alignment approach may be subject to further change due to regulations, data availability and quality, pathway availability, methodology updates, significant changes to the company structure, contractual arrangements, changes (or lack thereof) in public policy and government action and/or other developments affecting ING's clients, the sectors in which they operate or society as a whole. Please refer to ING's relevant disclosures for updates and additional information on the status, methodologies and target setting.

Certain of the statements above, including statements related to ING's efforts with respect to steering towards net zero, are not historical facts. Certain statements made of future expectations and other forward-looking statements convey management's current views and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in such statements. Actual results, performance or events may differ materially from those in such statements due to a number of factors, including, without limitation: business, operational, regulatory, reputation, transition and other risks and challenges in connection with climate change and ESG-related matters, including data gathering and reporting and the other risks and uncertainties detailed in the most recent 2024 [ING Group Annual Report on form 20-F](#) (including the Risk Factors contained therein) and ING's more recent disclosures, including press releases, which are available on [ING.com](#). All information (including any forward-looking statements) made by or on behalf of ING speak only as of the date they are made, and ING assumes no obligation to publicly update or revise any forward-looking statements, whether as a result of new information or for any other reason.

Date: April 2025