Registration No.: 37966-7/2026
Administrator: xxxx
Subject: Supervisory measures and the imposition of a supervisory fine on the Hungarian Branch of ING Bank N.V. based on monitoring carried out in the course of supervision

Decision No. H-PM-I-B-38/2026.

In terms of the **Hungarian Branch of ING Bank N.V.** (registered office: 1068 Budapest, Dózsa György út 84. Building B; company registration number: 01-17-000547) (**Company**), within the framework of the supervision exercised over the Company, the Hungarian National Bank (registered office: 1054 Budapest, Szabadság tér 8-9., site: 1122 Budapest, Krisztina körút 6.) (**MNB**) based on its monitoring of the implementation of MNB Resolution No. H-PM-I-B-16/2025. dated 2 October 2025 (**Resolution**) (registration No.: 33226-25/2025) hereby adopts the following

r e s o l u t i o n

I. MNB requires the Company to carry out its internal audit by 30 November 2026

1. an efficiency test to determine whether the quality control processes established by the Company ensure a targeted examination of the fulfilment of Hungarian legal requirements in relation to the anti-money laundering tasks performed by other group members; [Aml.8.]
2. a sample-based effectiveness review to assess whether the processes and procedures established by the Company on the basis of its internal regulations are fully compliant with domestic laws, in particular whether they ensure the implementation of enhanced procedures and enhanced customer due diligence measures in accordance with domestic laws. [Aml.4.]

II. The MNB requires the Company to send the MNB, by 31 December 2026, the internal auditor's reports and the underlying documents proving the full verification of compliance with Section I of the operative part of this resolution. [Aml.4., Aml.8.]

III. The MNB orders the Company to pay a supervisory fine of **HUF 3,000,000, i.e. three million Hungarian forints**, due to the infringement mentioned in Section I.1 of the reasoning of this Resolution**.**

Budapest, 15 October 2026