

Guideline for Political Communication

Commerzbank is a leading international commercial bank. The Bank transacts a substantial portion of Germany's foreign trade and is the market leader in German corporate banking. Based on its high level of sector competence in the German economy, the B11 millionbank is also a leading provider of capital market products and maintains one of the densest branch networks among German private banks. In total, the Bank serves more than 11 million private and small-business customers in Germany, and currently more than 70,000 corporate clients worldwide including multinationals, financial service providers and institutional clients. It therefore plays an important and responsible role in relation to economic and social policy. Commerzbank is also considered to be of national systemic importance.

"It is legitimate to cultivate contacts between, on the one hand, politicians and civil servants who are committed to the common good, and, on the other hand, organizations with their own individual goals. The purpose is the exchange of information and the reconciliation of different opinions and situation analyses. This allows particular demands or expectations of policy to be presented, and thereby exposes them to public debate about conflicting wishes. It therefore serves better understanding on all sides and supports decisions based on the common good."¹

Consequently, politicians and the public expect the Bank to comment on relevant economic issues. By engaging in an active and constructive dialogue with stakeholders, Commerzbank therefore takes the opportunity to familiarise itself with the various expectations and needs of its interest groups, where necessary to assist in decision-making and planning for its

corporate strategy, and to present its own points of view – also at the political level.

Commerzbank has fulfilled its increased political responsibility by establishing the "Public Affairs" division which acts as a conduit between contact offices in Berlin and Brussels and Issue-Management in Frankfurt, and an office at the International Institute of Finance (IIF) in Washington. By representing various interests, it is an integral part of the democratic opinion-forming process and seeks to promote informed and sound decisions geared to the common good. The main focus is to explain issues relevant to banks and the financial market. In so doing, we help politicians and administrators to develop and enhance their sector-related knowledge as the basis for making informed decisions. We call this approach "smart lobbying".

Commerzbank attaches great value to integrated and professionally grounded communication with political stakeholders² as well as organisations and the public. The Bank develops structures and platforms for political communications and does not rely solely on personal networks. Already established structures also encourage continuity, also in relation to regular changes in policy.

Public Affairs follows the current debate on political and regulatory issues in Germany, Europe and internationally. Draft legislation is also monitored and analysed to enable the Bank to develop its own positions on the relevant topics.

Commerzbank also maintains close links with academics and researchers. The Bank participates in events connected with politically relevant issues and engages

¹ German Public Relations Council (DRPR): Guideline for Cultivation of Contacts in the Political Arena.

² Politicians and political stakeholders participate in the political opinion formation and may be, for example, representatives of parties, trade unions, members of parliament, NGOs, regulators, supervisors, academics and researchers etc..

in an open and transparent dialogue with important political and social stakeholders.

Commerzbank is registered in the EU Transparency Register and reports on related activities, active participants, and annual expenditure associated with political opinion-forming.

Commerzbank has established the following principles and guidelines in order to define a clear framework for the appropriate cultivation of political contacts and interest representation. These activities are deemed to be legitimate subject to adherence to these principles.

Based on these principles, Commerzbank also complies with the Guideline for Cultivation of Contacts in the Political Arena of the German Public Relations Council (DRPR) and the Political Lobbying Principles of the Association of German Banks (BdB).

Principles of political lobbying

Integrity and trustworthiness are the cornerstones of Commerzbank's business. The transparency and probity of lobbying are also therefore essential prerequisites for serious political advisory.

In accordance with its Corporate Values, Code of Conduct and Corporate Responsibility Guidelines, Commerzbank acknowledges political lobbying which does not contradict its publicly stated positions (One-Voice).

Trustworthiness through transparency

Company representatives (and advisors acting on the Bank's behalf) are obliged to acknowledge that they represent Commerzbank AG by stating their function when interacting with political stakeholders and other interest groups.

Commerzbank and its representatives welcome initiatives to achieve greater transparency in politics and are registered in the lobby register for public institutions. The Commerzbank entry can be viewed in the EU Transparency Register.

The objective is to explain the Bank's business interests openly and to ensure that the information provided reflects the Bank's current knowledge base fully and unambiguously.

Commerzbank as a company does not make donations to political parties. Membership fees are not regarded as donations and are correspondingly recorded centrally.³ Organisations of which Commerzbank is a member are responsible for their own donations based on the respective legal rules, with particular account taken of the law which applies to political parties.

Integrity and probity

Commerzbank does not actively support any political party.

The Bank takes all measures necessary to ensure that it complies with the law and with other regulations and that it acts honestly.

Accordingly, within the context of its political lobbying, Commerzbank undertakes not to obtain any information by improper means, or to exert influence on decisions by improper means, or to make any such attempts to do so:

- Gifts to public officials, representatives of public institutions, civil servants, public service employees and politicians are prohibited. The only exceptions are small items, within the context of, for example, events which, while adhering strictly to public transparency requirements, reflect the Group's respect for a public office or a political role. Approval must be obtained for any such gifts and they must be documented.
- Other material benefits – such as invitations, events, endorsements etc. – must serve the exchange of information, take place within an appropriate context, and may not be carried out for improper purposes.

³ Membership fees do not constitute donations, since, similar to entrance charges, payment of them is mandatory (Donations Guideline; definition and demarcation of terms).