Sustainability at Commerzbank

Corporate responsibility should be manifested in all corporate entities and at all levels of the value added chain. Our sustainability management is divided into five fields of action and thus covers all fields of business activity at Commerzbank. The diagram below shows selected results of our endeavours in 2013.

› Market and Clients as a field of action
We are familiar with our market role and offer our clients products with added value for the society.

› Governance as a field of action
We know our job and the limits of our business.

› Society as a field of action
We are committed to a society with a sustainable future.

› Employees as a field of action
We know what is really important in the business of banking: qualified and committed staff.

› Environment as a field of action
We reduce our ecological footprint.

- 2,800 reviews of business enquiries and products made by the Reputational Risk Management
- 4.5bn euro for the funding of renewable energy
- 2.6m euro funding volume of the Foundation Centre
- Development possibilities for 30,000 specialists in the new professional career track
- 100% green electricity at all locations of the bank in Germany
- 2.6m euro for the funding of renewable energy
- 4.5bn euro for the funding of renewable energy
About this Report

This Status Report presents the most important news related to the commitment of Commerzbank to corporate responsibility and the bank’s results achieved in this area. The report is designed for all Commerzbank stakeholders. The editors included activities ranging from 1 July 2013 to 30 June 2014, so the report follows up immediately on the previous Corporate Responsibility Report. The statistics it contains principally reflect the situation as it was in 2013 and refer to Commerzbank AG (Germany). The data were collected in a decentralised way, from the different specialised departments and/or recorded by the environment management system, and assembled by the Department of Corporate Responsibility.

This report meets the requirements of an annual progress report on the state of the implementation of the ten principles of UN Global Compact (“Communication on Progress”). The tabular overview on page 18 contains the information about the place where the different topics can be found in this report. For important information about the business performance of Commerzbank see Annual Report 2013.

We have omitted using gender-neutral wording to make the text more readable. The Status Report on Corporate Responsibility 2014 is available in electronic form in both English and German. The comprehensive detailed format of the next report will appear in 2015. All sustainability reports as well as amendments and updates regarding the sustainability topic are available on our internet portal “Our Responsibility” under www.nachhaltigkeit.commerzbank.com.

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Martin Blessing,
Chairman of the Board of Managing Directors of Commerzbank AG

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Trust is the backbone of every economy. Banks felt the severe pain of the absence of trust during the recent financial crisis. We at Commerzbank, too, have made mistakes. However, we have also learned our lesson. Today we do many things differently than before the crisis. For Commerzbank fairness and competence are key values – fairness in dealing with clients and competence in all questions of finance. These two principles determine our actions – in our day-to-day business and as part of the society.

But it is also clear: Focusing on profit is not only a legitimate fundamental motive of economic behaviour but also a condition of sustainable business activity which though must not lead to an excessive pursuit of profit. Since, in that case, all that enables achieving short-term profit becomes an unproportionally high burden for future returns.

Therefore we welcome the regulatory conditions that guide the financial sector towards more ethical and sustainable behaviour. This happens, for example, through new remuneration structures and modified capital requirements for operational risks. The expectations and wishes of our clients are at least just as important. The fact that fairness and competence represent focal points of Commerzbank and client satisfaction is a central metric in sales is favourably accepted by our clients and by our staff.

Trust needs transparency: This report offers an overview of what we do to live responsibility and to anchor it in our corporation. We also describe Commerzbank’s progress in its commitment to implement the ten principles of the UN Global Compact. On this occasion I wish to thank all members of the staff who took part in the effort.

Martin Blessing
Chairman of the Board of Managing Directors of Commerzbank AG
Setting Limits to our Business Activity

With clear guidelines and commitments based on internal and external requirements we define the conditions and limits of our business activity, whereby we always keep in mind the needs to reduce risks and use chances – in the sense of responsible corporate risk management.

Developing reputational risk management
The tasks of reputational risk management include checking all funding, products and customer relationships, where sustainability aspects are particularly important. We focus on socially, ethically and ecologically sensitive topics, such as armament goods, energy production and the exploitation of raw materials. Reputational Risk Management determines conditions and limits of Commerzbank’s business activity – it formulates requirements and rejects business or customer relationships that do not meet specified conditions.

In the business year 2013, Reputational Risk Management processed about 2,800 enquiries (2012: 2,600). The constant increase in the number of requests for approval reflects both the great sensitivity of our staff as well as the growing awareness of the public to sustainability. Ten percent of requests for assessment, including business related to nuclear energy or armament production, received a negative rating due to social, ecological or ethical considerations. This may lead to a rejection or termination of business deals or business relationships.

Reputational Risk Management has undergone further development especially in Private Customer, Corporates & Markets and Non-Core Assets segments as well as in significant subsidiaries during the reporting period. This applies to the systematic analysis of the different reputational risks as well as the implementation of measures, processes and guidelines for the detection, assessment and processing of relevant risks. In 2013, numerous interviews and training programs took place again to sensitise Commerzbank’s staff to reputation related topics.

Requests for assessment in reputational risk management in years 2011–2013

Commerzbank voluntarily provides declarations of conformity with the German Sustainability Code
At the request of the Federal Government and in dialogue with representatives of the financial markets, corporations and the civil society, the Council for Sustainable Development formulated key sustainability reporting criteria for corporations. The German Sustainability Code comprises twenty criteria including performance indicators from the areas of ecology, social and corporate management. Their content is based on principles that were formulated by the Global Reporting Initiative and the Confederation of European Financial Analysts. With the submission of the voluntary declaration of conformity on 15 November 2013, Commerzbank committed itself to this standard which provides for transparency, commitment and comparability in the communication of corporate sustainability performance.

The compliance function – an integral component of internal governance
In December 2012, the Federal Financial Supervisory Authority (BaFin) published the amended minimal requirements for the risk management of banks and financial service companies (MaRisk). One of the new significant features was the implementation of a cross-departmental compliance function the primary task of which was to advise the different business segments on the implementation of important regulatory issues and to coordinate internal bank cooperation.
Commerzbank took up these new requirements and established the new function within the corporate segment of Group Compliance. Its essential task is to ensure transparency in the implementation of regulatory requirements and to promote cross-segmental cooperation. In this way, information about key legal changes, implementation activities designed to meet the requirements and compliance within the framework of the operational processes is centralised and evaluated across the departments. The compliance function reports regularly on the appropriateness and effectiveness of the applied measures. If specific risks are identified the compliance function takes action to determine and implement appropriate mitigating measures.

**Development of sanction filters**

Commerzbank monitors all relevant cross-border transactions that are processed by the bank and compares them against national and international sanctions lists. Sanctions lists are used to check the involved parties and to take appropriate steps, if persons or organisations that are subject to legal or economic restrictions are detected. We have made significant improvements to the effectiveness and the conditions of uniform group-wide application of these lists following a thorough overhaul of our global sanctions filter in 2013. Every month we check several million transactions.

**Regular exchange with stakeholders**

In its Corporate Responsibility Guidelines Commerzbank commits itself to an open and constructive dialogue with its stakeholders. The loss of trust following the crisis of the financial markets made this dialogue very important. We regard it as our task to maintain an open dialogue with our stakeholders and to use its results in the spirit of our corporate responsibility.

Therefore we regularly discuss with non-governmental organisations (NGOs) the possible effects of our business on people and the environment. This dialogue, an established event format named “NGO-Bank Dialogue”, has been taking place for several years and is a platform where representatives of German-speaking banks and non-governmental organisations exchange opinions on topics of sustainability.

The event series “Commerzbank in Dialogue” has been another discussion platform since 2010 where high-profile representatives from politics, business and society exchange ideas on current challenges. The topics discussed during this reporting period included “Challenges and Prospects for Germany as an Industrial Nation” and “The Modern Information Society – Challenges for Policy Makers and Companies”. With the initiative “Political Breakfast” we promote the dialogue on social and business policy topics. Numerous events focusing on different topics were organised within this framework in 2013. Participants discussed issues such as “More Market and More State – Targets of a Green Financial Market Policy” or “Germany Undersupplied – Perspectives for Savers and Investors”.

We have rearranged the internet portal “Our Responsibility” to provide stakeholders and others who are interested in the matter, a simple and structured access to information on sustainability at Commerzbank.
Offering Products with Added Value to the Society

The growing significance of sustainability offers numerous chances to our bank: The turnaround in energy policy and CO₂ reduction call for new technologies and products that require large investments. At the same time interest in sustainable investment possibilities is growing. Therefore we are developing products and services that can meet the customer demand for funding and new sources of good return.

Influencing decisions on lending and funding
In general, all funding projects with a major impact on aspects of environment, ethics or society are carefully examined and assessed by reputational risk management (see page 5). The rating of our corporate clients is also a statement about the sustainability of their business development. Furthermore, ecological risk is a subject of loan assessment. Experts from outside the bank are brought into the decision-making process to help obtain a fair assessment of the risks, if environmental aspects are of major significance for a given corporation.

In 2013 Commerzbank made an important contribution to the funding of sustainable projects: Institutional investors, such as insurance companies and pension funds, can participate in major wind and solar energy infrastructure development projects in form of portfolio or individual transaction models. One such innovative model of 2013, valued 87 million euro, is the “Green Loan Fund” platform which is still to be expanded.

Another example is the cooperation with the Interamerican Development Bank (IDB): In a program named “beyondBanking: banking on global sustainability” we have jointly granted two syndicated loans – so-called Green Loans – for the funding of environment friendly projects and technologies in Brazil. The aim of this program is to promote sustainability in Latin America and the Caribbean.

In 2013 Commerzbank as consortium leader placed a “green bond” on the market for the French energy utility company EDF. This bond, with seven-year to maturity, is the first green bond issued by a corporation in this segment. EDF was so able to raise 1.4 billion euro. The result of this bond emission will be used exclusively for ecological and socially responsible investment projects such as wind or solar energy projects in France and North America. In 2014 we managed the emission of another green bond of the energy utility company GDF Suez, with a volume of 2.5 billion euro.

It was only possible to do this with the increasing demand for socially responsible investments. In mid 2014 Commerzbank therefore became a signatory of the Green Bond Principles of the International Capital Market Association.

Sustainably investing the money of our clients
Since autumn 2013, wealthy private clients and institutional investors can agree with Commerzbank to practising sustainable asset management service, whereby investments are made solely into securities that have been awarded the “Prime Status” by the oekom research rating agency. Investments in traditional funds that are listed on the stock exchange are optional and only if these funds are based on accepted sustainability indices. For institutional investors such as churches, charities and foundations considering sustainability aspects of their investments is particularly important. Commerzbank is there to provide support.

We offer other sustainable investments through strategic partnerships with selected investment companies: These include, for example, direct participations, bonds and stock or pension funds invested in social-ecological areas such as climate protection, solar and wind energy or targeted investments in segments excluding controversial products like tobacco and arms.
Taking part in the new energy policy
The new energy policy, initiated by the Federal Government, created many challenges also for the clients of Commerzbank. In 2013 we therefore launched the cross-segmental project “Energiewende@Commerzbank”, which is our contribution to shaping the future of our society as whole as well as support for our clients in the successful implementation of task connected to the new energy policy.

Commerzbank is already today making a respectable contribution to the turnover in the energy policy, in particular by funding renewable energies. The loan portfolio of the Centre of Competence Energy (CoC Energy) reached a volume of 4.5 billion euro in 2013 (2012: 5.1 bn) including 3.6 billion euro in project finance (2012: 3.6 bn).

Apart from that, with the Mittelstand product “Solar Light” Commerzbank offers a lean and standardised procedure for the funding of photovoltaic systems starting from an investment volume of 250,000 euro. In 2013 we realised “Solar Light” photovoltaic systems totalling an installed volume of 5.3 Megawatt Peak (peak output) and a funding volume of 5.5 million euro.

The combined wind, solar and bio-energy systems funded by Commerzbank until the end of 2013 helped to avoid annual emissions totalling 10.72 million tonnes CO₂. This corresponds to about 10 percent of all CO₂ emissions saved in Germany in 2013 by using renewable electricity.

As regards private clients business, we were able to obtain equally positive results also from externally conducted opinion polls and tests: Commerzbank came first in the “CityContest 2013” banking test conducted by Focus-Money. This outstanding and compared to the previous year clearly improved evaluation result is a clear sign of the success of our new strategy that shifts client satisfaction and quality of advice to the centre of our focus. This was also confirmed in early 2014 by the award “Beste Filialbank” granted by the journal “Euro”, where Commerzbank came first in the category “Advice on Location”.

Top grades from clients and the media
In the long-run we can be successful only with satisfied clients. Therefore we target our offers at the interests of our clients: Client satisfaction is a crucial characteristic in the assessments of our business success. Apart from the experiences of our own clients, also tests of independent media and institutes are relevant to us because they let us compare our performance against that of our competitors. In this respect, too, we were very successful in 2013.

An opinion poll commissioned by Commerzbank in 2013 revealed a marked increase in client satisfaction with the Mittelstandsbank. According to the study the subjects praised, apart from superior quality of advice, especially the active and individual attention they received. Correspondingly, 77 percent of small and medium-sized clients (2012: 70 percent) and 70 percent of large corporates (2012: 73 percent) were highly satisfied with the performance of the bank.
Not only our branches but also our products and services received many awards:

- In March 2014, a study of the Institut für Vermögensaufbau awarded the investment advice service of Commerzbank the best of all assessments. The “KundenKompass” (Customer Compass) in particular was praised as an outstanding example.
- The magazine Euro am Sonntag gave the “very good” (i.e. best grade) to Commerzbank twice: for our advice service in the field of wealth planning and retirement provisions as well as for our investment advice.

Clients of Commerzbank can expect to have the “best business account” according to a study commissioned by the news broadcasting company n-tv. The reason for this assessment was the favourable conditions of our offer.

Our offer is open to everybody

We strive to provide our clients with unrestricted access to our services, products and branches. We understand the endeavour of making this offer available to people in all parts of the country as an important contribution of Commerzbank to the infrastructure in Germany. This is the reason for operating a network of branches the density of which is one of the highest among private banks in Germany.

To make Commerzbank offers accessible to all social groups we put great value on barrier-free design of our branches. At the beginning of 2014, 65 percent of our branches complied with this requirement. In future, when refurbishing branches and installing automatic teller machines, we shall consider optimal access for all groups of users. Personal consultation in sign language has been a part of Commerzbank service for many years. A new feature since 2013 has been the round-the-clock accessibility via telephone banking. Since 2014, 80 percent of all Commerzbank automatic teller machines are fitted with “read out” function for visually impaired clients.

* The accolade from Focus-Money is based on the certification awarded to the Customer Compass by the Institut für Vermögensaufbau (Institute for wealth management). A comparison with other banks did not take place.
Limiting Adverse Effects on the Environment

The bank’s environment protection and the systematic reduction of resource consumption are important concepts in our understanding of sustainability. We are working on the different measures of our Group-wide climate strategy as well as on the continuous improvement of our certified environment management system to reduce the ecological footprint of Commerzbank.

Greenhouse gas emissions reduced again

We have made the voluntary commitment to reduce CO₂ emissions of Commerzbank by 70 percent by 2020 compared with the base year of 2007. We have been implementing various measures, in particular in the field of energy use and mobility, to achieve this target. This is primarily a question of avoiding or reducing greenhouse gas emissions. In case of emissions that are unavoidable or hard to avoid we look for possibilities of compensation in other areas of our activities.

The approximately 1,300 buildings of Commerzbank in Germany have been supplied with green electricity since January 2013. We demand proof of the source of energy from our suppliers and require EECS proof of origin from hydroelectric plants that are not older than seven years.

By changing over to green electricity we have greatly reduced our indirect greenhouse gas emissions from 24,659 tonnes CO₂-equivalent in 2012 to 7,059 in 2013 (see table on page 11, Scope 2).

The business travel of our staff, too, affects the CO₂-balance of Commerzbank. Approximately 61 percent of all business travel is made by car. In the “Sustainable Expenses Management for Tangible Assets” (NaSa) project we introduced new guidelines for the standardisation of the car pool and the processes in car pool management. Through the gradual procurement of more economical vehicles we can reduce emissions of the pool cars to less than 100g CO₂/km within five years. This corresponds to a saving of 18 percent CO₂ emissions compared to our current fleet.

With an average emissions rate of 133 g CO₂/km for vehicles ordered from the company leasing system in 2013, the comparable emission value of our fleet cars was below the value of newly registered cars in Germany of 136 g CO₂/km as indicated by the Federal Motor Vehicle Transport Authority (Kraftfahrt-Bundesamt). The bank charges a monthly CO₂ fee to holders of vehicles with an emission rate above 170 g CO₂/km to reduce the emissions of our car fleet even further and to motivate the staff to procure more economical vehicles.

Using this and other measures Commerzbank reduced its greenhouse gas emissions by 63.7 percent since 2007. Furthermore, we have compensated the unavoidable emissions generated in connection with our Annual General Meeting in May 2014 by our support of climate protection projects “ArBolivia. New Forests for Local Development” and “Moor-Futures” from Germany. Starting from 2015 we shall compensate CO₂ emissions caused by business flights.
Direct and indirect greenhouse gas emissions (GHG emissions) of Commerzbank AG (Germany)

<table>
<thead>
<tr>
<th>t CO₂-equivalents</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scope 1: Direct GHG emissions</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy supply buildings</td>
<td>28,732</td>
<td>28,504</td>
<td>25,633</td>
</tr>
<tr>
<td>Natural gas</td>
<td>28,086</td>
<td>27,981</td>
<td>25,091</td>
</tr>
<tr>
<td>Heating oil</td>
<td>637</td>
<td>469</td>
<td>455</td>
</tr>
<tr>
<td>Diesel for back-up power</td>
<td>9</td>
<td>54</td>
<td>87</td>
</tr>
<tr>
<td>Business travel (car)</td>
<td>16,787</td>
<td>17,417</td>
<td>17,997</td>
</tr>
<tr>
<td>Bank vehicles</td>
<td>15,010</td>
<td>15,753</td>
<td>16,571</td>
</tr>
<tr>
<td>Pool vehicles</td>
<td>1,777</td>
<td>1,664</td>
<td>1,426</td>
</tr>
<tr>
<td>Coolant and extinguishing agent losses</td>
<td>–</td>
<td>2,040</td>
<td>655</td>
</tr>
<tr>
<td>Coolant</td>
<td>–</td>
<td>2,040</td>
<td>655</td>
</tr>
<tr>
<td>Fire extinguishing agent</td>
<td>–</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total Scope 1</strong></td>
<td>45,519</td>
<td>47,961</td>
<td>44,285</td>
</tr>
<tr>
<td><strong>Scope 2: Indirect GHG emissions</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy supply</td>
<td>40,169</td>
<td>24,659</td>
<td>7,059</td>
</tr>
<tr>
<td>Electricity</td>
<td>26,882</td>
<td>16,898</td>
<td>7,059</td>
</tr>
<tr>
<td>District heating</td>
<td>13,287</td>
<td>7,761</td>
<td>7,059</td>
</tr>
<tr>
<td><strong>Total Scope 2</strong></td>
<td>40,169</td>
<td>24,659</td>
<td>7,059</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>t CO₂-equivalents</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scope 3: Other indirect GHG emissions</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Paper consumption¹</td>
<td>5,875</td>
<td>5,238</td>
<td>5,119</td>
</tr>
<tr>
<td>Energy supply in upstream and downstream emissions</td>
<td>7,749</td>
<td>12,205</td>
<td>11,053</td>
</tr>
<tr>
<td>Natural gas (in upstream and downstream emissions)</td>
<td>7,629</td>
<td>7,600</td>
<td>6,815</td>
</tr>
<tr>
<td>Heating oil (in upstream and downstream emissions)</td>
<td>118</td>
<td>87</td>
<td>84</td>
</tr>
<tr>
<td>Diesel back-up power (in upstream and downstream emissions)</td>
<td>2</td>
<td>10</td>
<td>16</td>
</tr>
<tr>
<td>District heating (in upstream and downstream emissions)</td>
<td>–</td>
<td>1,496</td>
<td>1,361</td>
</tr>
<tr>
<td>Electricity from renewable energies (pre-products and conversion losses)</td>
<td>–</td>
<td>3,012</td>
<td>2,777</td>
</tr>
<tr>
<td>Business travel</td>
<td>18,912</td>
<td>16,406</td>
<td>16,847</td>
</tr>
<tr>
<td>Air travel</td>
<td>6,021</td>
<td>4,093</td>
<td>4,803</td>
</tr>
<tr>
<td>Rail travel</td>
<td>1,402</td>
<td>1,177</td>
<td>378</td>
</tr>
<tr>
<td>Cars (in upstream and downstream emissions)</td>
<td>7,623</td>
<td>7,908</td>
<td>8,406</td>
</tr>
<tr>
<td>Business trips with indirect impact</td>
<td>3,866</td>
<td>3,228</td>
<td>3,260</td>
</tr>
</tbody>
</table>

1 Included is the assumed business mileage share of bank vehicle use in 2013 at 56 percent.
2 The share of renewable energies increased from 92 percent to 100 percent. Electric current related emissions are thus included only in Scope 3.
3 Paper consumption excluding printed matter obtained from external contractors.
4 The increase in rail and air travel is mainly due to business travel guidelines relaxed in 2012. Deutsche Bahn (German Rail) travel with green electricity since April 2013. This leads to significantly reduced emissions with rail travel.
5 Removal related travel is included in the scope of our calculation; however, the data are incomplete and therefore not reported.
6 The rise of CO₂ emissions is caused mainly by the high share of dump use for waste from construction work.
7 The big rise of Scope 3 emissions in 2013 is primarily caused by the first-time inclusion of staff commuting travel.
8 The determination of the Commerzbank climate target is based on a calculation of the overall emissions of Commerzbank without commuting.

The consumption data, the data collection mode and the calculation of CO₂ emissions have been verified by the external companies DNV GL Business Assurance Certification and Umweltgutachter GmbH.
New standards spare the environment and save resources

Apart from the reduction of greenhouse gas emissions we consider also other aspects that affect our ecological footprint. One central issue is waste resulting from our business activities. In 2013 over 92 percent of Commerzbank AG waste was reused and/or recycled, whereby paper used in banking operations accounted for about half of the total amount.

To save resources and reduce waste generated in the business process we plan to reduce in particular our paper consumption. In 2013 we were able to cut the total consumption of 4,260 tonnes by 2.27 percent against the figure of the previous year (2012: 4,359 t). In November 2013, as a part of the NaSa project, new standards were set also for the procurement of copy paper. In future pure white paper, we use for documents designed for external needs, must meet the PEFC standard. Internally we have changed over to recycling paper of a lower grade of whiteness that bears the Blue Angel environment seal.

Included again in the Climate Disclosure Leadership Index

The Climate Disclosure Rating of the international non-profit organisation CDP (previously Carbon Disclosure Project) evaluates the completeness, quality and transparency of corporate reporting related to issues of CO₂ emissions, climate protection strategies and measures. With 90 out of 100 points Commerzbank increased its rating in 2013 compared with the previous year by 11 points and thus was included – again after 2011 – in the “Climate Disclosure Leadership Index DACH 2013”. In this index CDP lists every year the best ten percent of the companies in German speaking countries. In the Performance Score, which measures the efficiency of the climate protection measures, Commerzbank has been also able to advance to A– rating (2012: B).

Energy consumption continues to fall

In 2013 Commerzbank consumed 11.6 percent less energy than in the previous year. Energy consumption has thus been falling for several years in a row. Especially the indirect energy consumption via electric current was significantly reduced in 2013.

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**Waste by Commerzbank AG (Germany) by category**

<table>
<thead>
<tr>
<th>t</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste for re-use/recycling¹</td>
<td>32,555</td>
<td>16,106</td>
<td>11,582</td>
</tr>
<tr>
<td>of which paper</td>
<td>9,618</td>
<td>9,515</td>
<td>6,316</td>
</tr>
<tr>
<td>Waste for incineration</td>
<td>1,006</td>
<td>461</td>
<td>316</td>
</tr>
<tr>
<td>Waste to landfill²</td>
<td>264</td>
<td>72</td>
<td>668</td>
</tr>
<tr>
<td>Hazardous waste</td>
<td>101</td>
<td>5</td>
<td>–</td>
</tr>
<tr>
<td>Waste total</td>
<td>33,926</td>
<td>16,644</td>
<td>12,566</td>
</tr>
</tbody>
</table>

¹ Compared to the previous year, the recycling rate of 92.2 percent (2012: 96.8 percent) slightly decreased.

² Waste to landfill predominantly resulted from construction and demolition work. The increase in 2013 is due to two major construction projects.
Ensuring Sustainable Success through Qualification and Commitment

A partnership and fair relationship to the staff is a basis for long-term success of the company. In 2006 we defined five values for Commerzbank to lend our staff a sense of identity and create a corporate prejudice-free culture. These ComWerte (corporate values) guide us in dealing with each other as well as with internal and external clients, partners in the market and the society at large.

Stable employee structure
We promote qualification, motivation and loyalty of our staff through personnel work adjusted to their needs. One of the aims of our work is to provide a balanced and stable employee structure. Commerzbank AG employed 36,037 staff at the end of 2013. This was 1,631 less than in the previous year.

The average duration of employment at Commerzbank AG (Germany) was approximately 17 years. The turnover rate fell from 9.4 percent in 2000 to 4.3 percent in 2013. Reaching the share of 26.1 percent women in leadership positions at Commerzbank AG (Germany) we moved again a little closer to our aim of 30 percent women in leadership positions by 2015 (Group: 27.4 percent). The overall share of women at Commerzbank AG was 51.1 percent.

Greater staff satisfaction makes us stronger
Commerzbank conducts an employee survey in Germany and abroad every 18 months to determine the general level of satisfaction. The survey in spring 2013 displayed a marked increase in employee commitment – especially in the private client segment – compared to the previous survey in 2011. The share of employees who were prepared to recommend the bank as a competent financial service provider with attractive products and service, to their friends and acquaintances almost doubled. Brand values “Fairness” and “Competence”, which have become the central part of our brand positioning, are well accepted. The way people feel about the image of Commerzbank and its implementation has become much better since 2011, when the results indicated that there was still some scope for improvement.

New training and development possibilities
In 2013 the focus of Commerzbank’s personnel work was the employees’ wish, expressed in the survey of 2011 to expand possibilities of professional development. The most important measure was the introduction of the “Commerzbank Academy” in summer 2013. The Academy bundles together all previous offers and enables lifelong learning with a system and a perspective. The employees can now better influence and shape their professional future and, together with their superiors, assume more responsibility for their development.

The introduction of the Commerzbank Expert Programme completes the lifelong training model by offering clearly structured training and development possibilities also to the approximately 30,000 specialists. The professional career track thus becomes an equivalent development path alongside the project and management career tracks.

Success of the diversity strategy
Commerzbank is diverse. For example, in Germany we have employees from 85 nations. We use the “Global Diversity Management” to steer our diversity measures throughout the group. The central body determining the strategic direction is
the “Global Diversity Council”. Our employees can find all the relevant information on the topic of diversity on the Intranet and on our Diversity Portal.

We have many different ways of helping our employees to harmonise the needs of their job and family. Our offers include childcare facilities and father-child weekends. For employees who nurse relatives, we organise workshops and seminars. In 2013 altogether 2,531 employees took up the option to take parental leave – 15.8 percent of them were fathers. The average duration of parental leave was 9 months for women and 2.1 months for men.

We enhance diversity in the company by offering up to 50 events annually on various diversity topics via the “Forum Diversity”. Our 1st Diversity Day at Commerzbank was centred on networks of our employees and offered the chance to exchange information: ARCO (homo-, bi- and transsexuals), the women’s network Courage, Fokus Väter (Focus Fathers), Horizont (the burnout topic), Kulturwerk, Cross Culture and the network Pflege (Care). Almost 1,000 employees are organised in the seven networks of the bank.

We were also able to increase the share of women in leadership positions of the Commerzbank Group, from 25.7 percent in 2012 to 27.4 percent in 2013, and we continue working on our aim to reach a share of 30 percent by 2015.

Health management on a high level
We take care of the health of our employees on their workplace. Employees in good health feel better, are motivated and efficient. Health management focuses on nutrition, stress management, addiction prevention and movement. In February 2013 Commerzbank was the first company certified by TÜV-Süd (Technical Monitoring Association – South) in the field of Corporate Health Management in Germany. The certificate has been renewed by TÜV in 2014. The bank was thus honoured for its sustainable approach to the maintenance of health of its employees.

Full time/part time employment ratios at Commerzbank AG

<table>
<thead>
<tr>
<th>%</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full time</td>
<td>27,797</td>
<td>78.0</td>
<td>26,465</td>
</tr>
<tr>
<td>Part time</td>
<td>7,834</td>
<td>22.0</td>
<td>8,003</td>
</tr>
</tbody>
</table>

1 Excluding trainees.

A suitable working time model for each stage in life
The working time models of Commerzbank are an important contribution to working flexibility. In 2014 we optimised the existing part-time models and developed examples for life-stage oriented applications, which offer our employees the possibility to harmonise their working time with their everyday life situation. Our employees can use the different part-time models and sabbatical varieties to adapt their working time to their needs.
Job and family in balance
Commerzbank employees have many different possibilities to reconcile the needs of their family and job. The bank supports them countrywide with childcare facilities. Emergency and holiday care was used by 1,534 children on 5,626 days in 2013.

Care for relatives has experienced shift in our awareness as a result of demographic change. As the first signatory of the “Charta for care of persons in need – Hessen” we clearly show that we are aware of this challenge. Commerzbank has become one of the first companies in Germany to offer comprehensive care services to its staff with relatives requiring care, such as free consultations and arrangement for time needed to take care of others. In 2013, this service earned us the second place in the personnel management award, in the category of large corporations, sponsored by the Federal Association of Personnel Managers.

Two awards in idea management
Our idea management gets our employees involved in the optimisation of corporate processes and provides for a high level of transparency via submitted ideas and the progress in their realisation. The basis for this is the “WikIdee” online platform which is used by the employees to submit and discuss their suggestions for improvement. In 2013 over 3,000 employees submitted 3,655 ideas 375 of which were eventually implemented. Currently some 37,400 bank staff can access WikIdee. In March 2013 WikIdee received the award “Best Idea Management 2013” from the Centre of Idea Management. In December of the same year the second award followed: The journal “Human Resources Manager” bestowed upon the bank the Excellence Award 2013 in the category “Knowledge Management”.

Remuneration models revised
The new equity capital regulations of the EU for financial institutions affect also remuneration systems. In Germany this is being implemented in an amendment of the German Remuneration Ordinance for Institutions (Instituts-Vergütungsverordnung) that modifies and/or tightens the existing rules. The aim is to align the remuneration systems of the European financial institutions with the long-term successes and risks of the corporation. The remuneration systems of Commerzbank are also affected. Details of the actual implementation in our remuneration models are currently being elaborated.

In mid 2013 Commerzbank committed itself, along with the Deutsche Bank, DZ Bank, HSBC Trinkaus & Burkhardt and HypoVereinsbank, to the integration of ethical principles in the remuneration system of management. Future remuneration packages of management will reflect, in addition to business parameters, also the ethical dimension. The fundamental principle is to design transparent remuneration systems and to exclude false stimuli.
Commerzbank, as part of the society, sees its task also in positively influencing its environment. We work for the common good through numerous cooperation and sponsoring programs, the support of voluntary involvement of our staff and the activities of nine foundations.

Educational sponsorship program in round two
In Germany inadequate educational and equality chances are manifested, among others, by a high proportion of young people who leave school without completing the lowest level of education. Many depend on support when starting their work career. The educational mentoring program of Commerzbank, established in 2013, focuses on young people who find it difficult to complete their basic education, cannot find an apprenticeship and are in danger of breaking off their training. In the first year of the program 40 employees of Commerzbank worked as mentors, each one at the side of one young person. The mentors motivate, offer ideas, show development possibilities, formulate goals and help the subjects in their professional orientation in an intensive one-to-one relationship lasting one year. The educational mentors act as coaches and advisors outside the usual school and training environment.

The young people must be advised and supported by a regional facility as a condition for participation in an educational mentor program. Partners can be selected initiatives that are locally active in the promotion of youths, such as welfare associations (Diakonisches Werk Berlin-Brandenburgschlesische Oberlausitz e.V. or Startblock-Rhein-Main e.V.). The program, in the first year restricted to the states of Berlin, Hamburg, Hessen and Nordrhein-Westfalen, will be extended to the states of Bayern and Thüringen due to the good resonance. The educational mentors, whose number will increase from 40 to 50, will be professionally trained for their tasks and continually supported with specially designed offers. This educational program makes a contribution to the promotion of educational equality in Germany and gives our staff the possibility to get involved and acquire new competences through their voluntary work.

“DFB-Junior-Coach” project extended
The promotion of sport is yet another central component in Commerzbank’s social involvement. It is closely linked to our work in the area of education, focuses on the promotion of young talents and supports widespread sport. One of our central projects as national partners is the support of the “DFB-Junior-Coach” initiative launched by the German Football Association (DFB). Starting from the beginning of the school year 2013/2014, it allows participating pupils to start training to become licensed trainers. Apart from sport training education by the DFB as future trainers the learners get prepared for a professional career and learn to accept responsibility as well as undergo personal development. The participants also benefit from the competences of Commerzbank which, in addition to providing practical general education in areas of finance and economic basics, offers also training in formulating applications or going through internships in the different branches of the bank. Junior-Coaches are assisted by a Commerzbank mentor as contact persons, if required. The target of the program is to win over young people for involvement in voluntary football-related work while at the same time supporting them at the beginning of their working life. Following the successful start of the initiative in 48 schools in Germany we are expanding the offer, together with the DFB, to 96 schools in the school year 2014/2015.

Space for modern art in the “Taunus Tower” in Frankfurt
Introduction to art education, too, contributes to the promotion of educational equality in Germany. For this reason Commerzbank backs efforts to make art and culture accessible to the broad public and thus complements the support projects of its foundations also in this area.

Starting from autumn 2014 some 2,000 square meters of new exhibition space will be made available to the Frankfurt Museum for Modern Art (MMK). The space is located in the Frankfurt Taunus Tower that was jointly developed by CommerzReal and the real estate developer Tishman Speyer. Both project partners have dedicated the space to free use, rent and other associated costs, for 15 years. The operation costs of the space will be covered by the founding partners.
and friends of MMK together with the project coordinating MMK-foundation. The latter was launched in 2010 with a donation of one million euro from Commerzbank for the promotion of MMK.

Manifold involvement of foundations

The different Commerzbank foundations are organised under the umbrella of Commerzbank Foundation Centre. The joint goal of the foundations has set new impulses to social development in science, education, art and culture as well as in the different areas of the society. The foci of the foundations differ: The Commerzbank Foundation focuses on the promotion of science, culture and social projects, whereas the Jürgen Ponto Foundation targets young talents in the field of music, literature and visual and performing arts. The Dresden Cultural Foundation of Dresdner Bank is committed to the cultural and scientific development of Dresden. The foundation management of Commerzbank is rounded off by the work of six social foundations that provide financial support to employees and retired members of the bank who are in distress through no fault of their own.

The Deutsche Lesepreis (German Reader Prize), awarded in 2013 for the first time, is a new project jointly initiated by the Commerzbank Foundation and Stiftung Lesen. This prize will be awarded in future every year for innovative ideas that encourage reading and thus contribute to maintain and develop the culture of reading, since reading is one of the most important basic skills of the society. Despite that, almost twenty percent of the inhabitants of Germany – both young and adults – are incompetent readers. The foci of the Deutsche Lesepreis award are the potentials of digital media and new approaches to motivate people to read. The prize, totalling €23,000, is awarded in four categories.

International commitments

Commerzbank subsidiaries are also socially committed with a particular focus on education. The private initiative “Pajama Program” in the United States supports children living below poverty line. Employees of Commerzbank North America support this project by donations for new books or pajamas, they regularly visit and read to children at the Reading Centre of the Pajama Program.

In connection with the “Reading & Number Partners” program Commerzbank employees in London spend their lunch breaks with young pupils helping them with learning. The focus here is to practice reading and counting skills of children in a playful and interactive way and thus to let them have fun and make them interested.

Donations breakdown provided by the Foundation Centre

<table>
<thead>
<tr>
<th>€</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commerzbank Foundation</td>
<td>1,417,000</td>
<td>1,385,000</td>
<td>1,451,000</td>
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<tr>
<td>Jürgen Ponto Foundation</td>
<td>243,000</td>
<td>422,000</td>
<td>397,000</td>
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<td>Dresden Cultural Foundation of Dresdner Bank</td>
<td>242,000</td>
<td>225,000</td>
<td>253,000</td>
</tr>
<tr>
<td>Charitable foundations</td>
<td>493,000</td>
<td>502,000</td>
<td>512,900</td>
</tr>
<tr>
<td>Total</td>
<td>2,395,000</td>
<td>2,534,000</td>
<td>2,613,900</td>
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Endowment capital of the Foundation Centre

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<th>€m</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
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<tbody>
<tr>
<td>Commerzbank Foundation</td>
<td>58.00</td>
<td>58.00</td>
<td>63.00</td>
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<tr>
<td>Jürgen Ponto Foundation</td>
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<td>Dresden Cultural Foundation of Dresdner Bank</td>
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<td>7.7</td>
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<tr>
<td>Charitable foundations</td>
<td>20.2</td>
<td>20.2</td>
<td>20.2</td>
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<tr>
<td>Total</td>
<td>97.7</td>
<td>97.7</td>
<td>102.7</td>
</tr>
</tbody>
</table>

Society as a field of action
www.nachhaltigkeit.commerzbank.com > Society
Commerzbank Foundation Centre
www.nachhaltigkeit.commerzbank.com > Foundation Centre
Commerzbank Educational Mentor Program
www.bildungspate.commerzbank.de
German Reader Prize
www.deutscher-lesepreis.de
DFB-Junior-Coach
www.sponsoring.commerzbank.de > DFB-Premium-Partner > DFB-Junior-Coach
MMK Museum of Modern Art Frankfurt
www.mmk-frankfurt.de
## The ten principles of the UN Global Compact

<table>
<thead>
<tr>
<th>Human rights</th>
<th>Examples for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Businesses should support and respect the protection of internationally proclaimed human rights</td>
<td>p. 5-7; CR Report 2013 p. 12-13, 54-55</td>
</tr>
<tr>
<td>2. Businesses should make sure that they are not complicit in human rights abuses</td>
<td>p. 5-7; CR Report 2013 p. 12-13, 54-55</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Labour</th>
<th>Examples for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining</td>
<td>CR Report 2013 p. 71-73</td>
</tr>
<tr>
<td>4. Businesses should uphold the elimination of all forms of forced and compulsory labour</td>
<td>CR Report 2013 p. 54-57, 69</td>
</tr>
<tr>
<td>5. Businesses should uphold the effective abolition of child labour</td>
<td>CR Report 2013 p. 54-57, 69</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Environment</th>
<th>Examples for implementation</th>
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</thead>
<tbody>
<tr>
<td>7. Businesses should support a precautionary approach to environmental challenges</td>
<td>p. 7-8, 10-12; CR Report 2013 p. 16-18, 55, 62-69; AR 2013 p. 45-46, 130</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Anti-Corruption</th>
<th>Examples for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Businesses should work against corruption in all its forms, including extortion and bribery</td>
<td>p. 5-6; CR Report 2013 p. 12-14, 55-57; AR 2013 p. 45</td>
</tr>
</tbody>
</table>