



COMMERZBANK

Sustainably inclusive.

Action Plan Inclusion 2.0



The bank at your side

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**‘A corporate culture
of inclusion and mutual
respect reinforces our
sense of belonging,
our motivation
and the success
of our company.’**

Prof. Dr. Jens Weidmann

Former President of the Deutsche Bundesbank
Chairman of the Supervisory Board of Commerzbank AG
Professor of Practice in Central Banking at the Frankfurt School
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Foreword by

The employer and social partners

Different Together.

We were proud of this guiding principle when we launched our first Action Plan for Inclusion in 2018, and we are all the more so today. As a bank, we have been a trailblazer with our action plan for the inclusion of people with disabilities. That is because we have taken the decisive and fundamentally self-evident step of recognising people with their individual potential and proficiencies – regardless of a limitation. In taking this step, we have triggered a large number of activities that have greatly contributed towards our culture of cooperation. Not only have we entered into commitments of our own but have also shown that we stand by them in practice and in everyday life. Through membership in the Board of Managing Directors, our Representative Council for Severely Disabled Employees and our Works Council.

The projects, measures and goals that we had presented as part of our action areas have provided the desired orientation. We have witnessed numerous encouraging examples of how employees have dedicated themselves to more inclusion in everyday life: in hiring processes, in promoting junior staff with disabilities, through the support of technical solutions in the workplace or through the further developments in barrier-free qualification offers and online applications.

We think it is important to expand our action areas by developing our first action plan further and strengthening our commitment to the importance of inclusion. As part of this effort, in addition to our severely disabled employees and those with a recognised entitlement to equal treatment, we also focus on people with health burdens, and mental-health burdens in particular. This is complemented by implementation of the German Accessibility Enhancement Act for our private clients. We quickly began offering our clients barrier-free services and products at the earliest possible opportunity.

We are confident that the individual steps within the new action plan will lead to further improvements and that inclusion will become an increasingly natural part of our thinking and actions as employers, managers and colleagues – and as a bank working by our clients' side.

As an employer and as committee representatives, we will continue offering our complete support of the goals of the action plan in the future. We know that inclusion not only represents added value in terms of our coexistence, but also helps make our bank and all of us more successful. That is why inclusion concerns us all: **Sustainably inclusive.**



Sabine Mlnarsky

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Christof Eßer

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Council

Intro

Diversity & Inclusion

Diversity is our strength. Different Together. Sustainably inclusive. This simple yet profoundly important conviction is an important pillar of our corporate culture. We are firmly convinced that sustainable success lies in actively promoting and recognising all individual talents and backgrounds. For us, inclusion is more than a requirement; above all, it is the key to innovation, a respectful coexistence and shared growth.

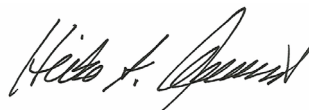
Already in 2018, we launched our first action plan to implement the United Nations Convention on the Rights of Persons with Disabilities. This was a groundbreaking step. We are proud to have been the first German bank to set out on this path. From the outset, our goal was for Commerzbank to create a sustainable setting in which all employees, regardless of their personal traits, would have an opportunity to develop their full potential.

Whether in sports, in society, in the business world or in working life: In an ever-changing world, inclusion is growing increasingly important. We are proud to have continued our journey, boldly and consistently ensuring that inclusion and diversity are anchored not only in our principles but in our day-to-day practice as well. Our action plan contains specific measures and steps to ensure that Commerzbank is more than an inclusive employer: that it is a place where diversity is respected and encouraged. Hence, our action plan, Inclusion 2.0, is yet another step that will further solidify our stance on the promotion of diversity and inclusion.



Sofia Strabis

Head of Diversity & Inclusion, Health, HR
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Heiko Alexander Nenast

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Intro

Inclusion Officer

In a world shaped by diversity, our firm conviction is that it is only natural for people with and without disabilities to work together. Our obligation to promoting this collaboration is reflected in the close partnership between the Representative Council for Severely Disabled Employees and the Works Council. They work together, tirelessly dedicating their efforts on behalf of the interests of employees with disabilities – whether when they join the company or during the course of their ongoing employment at Commerzbank.

Inclusion is an ongoing process that must be actively practiced and promoted. With this in mind, we aim to create a working world in which everyone enjoys the same opportunities in their working life, regardless of any limitations. We have already taken important steps in this direction between 2018 and 2023 as part of our joint action plan. There are additional barriers that need to be overcome, however, particularly in the areas of communication, knowledge transfer and continuing education.

We are aware that some restrictions are not apparent at first glance. Sometimes it is the characteristics that are barely visible that call for special attention. We are determined to team up with our entire workforce, no matter what technology or assistance they may require, to create a work environment in which genuine integration and complete collaboration are possible. Our clear message is this: Only if we overcome all barriers, whether in our minds or in technology, can we build a future that is inclusive and successful in equal measure.



Sven Leyendecker

Inclusion Officer at Commerzbank



The UN Convention on the Rights of Persons with Disabilities and the German Accessibility Enhancement Act

The UN Convention on the Rights of Persons with Disabilities (UNCRPD) marks a significant milestone not just for people with disabilities but for society as a whole. It became binding in the Federal Republic of Germany on March 26, 2009. This Convention specifies the rights of persons with disabilities, underscoring that they have the inalienable right to full participation in society. The guiding principle of the UNCRPD is this concept of inclusion, which does not involve requiring individuals to adapt and instead enshrines acceptance of diversity as a self-evident principle.

Important here is Article 27 of the UNCRPD: It deals with work and employment. The article underscores the equal right to work on the part of persons with disabilities and prohibits discrimination in all areas of employment – from selection and recruitment to career development and guarantees of safe working conditions.

To implement the requirements of the UNCRPD, in 2011 the German Federal Government launched the National Action Plan for the Implementation of the UN Convention on the Rights of Persons with Disabilities in an effort to further promote equal access to political, social, economic and cultural participation on the part of persons with disabilities. Since that time, the German Federal Government has updated its National Action Plan to Version 2.0. And not only the federal government, but also enterprises, states, municipalities and associations have joined in this commitment with action plans of their own. These plans identify specific measures and goals as part of the effort to firmly integrate the idea of inclusion in corporate and organisational culture.

Another important step in this direction is the passage in 2021 of the German Accessibility Enhancement Act, the requirements of which must be implemented by mid-2025. This legislation provides for the elimination of digital barriers in order to facilitate participation for all. The German Accessibility Enhancement Act and its accompanying regulation enacts EU Directive (EU) 2019/882, which deals with accessibility requirements for products and services. The aim of this legislation is to foster an inclusive society in which people of all ages who are experiencing disabilities or limitations can enjoy equal rights and equal access to products and services.



Sustainably inclusive. Commerzbank Action Plan Inclusion 2.0

Breathing life into the inclusion of people with disabilities is not just a question of social responsibility. It is increasingly becoming a living part of our attitude – and an increasingly important part of our pursuit of sustainability.

With our first Action Plan Inclusion, ‘Different Together.’, which was published in 2018 and based on the UNCRPD issued by the United Nations, as a bank in Germany we took the step into a public commitment; we have now even expanded upon this with our Action Plan 2.0. To this day, we remain the first bank in Germany to have made a clear commitment to complete compliance with human rights on the basis of an action plan and state its intention to become an inclusive enterprise. This Action Plan takes existing measures into account and develops them further in accordance with the goals of the UNCRPD. Within just five years’ time, the bank has taken meaningful steps towards becoming an inclusive employer and raising awareness amongst employees that employees with disabilities or health impairments not only represent an enrichment for the company but also, in significant ways, contribute towards its success.

This is how the Commerzbank Action Plan Inclusion 2.0 builds upon the previous successes of the first action plan.

Our areas of emphasis are reflected in seven action areas and include:

- the ongoing integration of inclusion in our corporate culture
- the promotion of preventive health care
- the awareness of needs and the design of products from the client’s perspective as well as
- implementation of the German Accessibility Enhancement Act in ways that go above and beyond the scope of this legislation.

Sustainably and inclusively. This is how we dedicate ourselves to maintaining and continuously building upon the progress made, with regard both to our employees and future workforce as well as our clients.

We are firmly convinced that our employees' well-being is of fundamental importance. Hence, in our second action plan, we integrate sustainable measures for the promotion of physical and mental health that foster the well-being of our workforce and strengthen our commitment to preventive health care.

The newly added client perspective forms another key value. To us, it is crucial to offer products and services that are inclusive and that take the needs of all clients into account. We strive to develop solutions that are accessible and useful to every target group, regardless of their background or their individual requirements.

To us, the German Accessibility Enhancement Act is more than an obligation: It presents an opportunity to exceed expectations. We want to ensure that our products and services not only comply with the requirements of applicable law but also offer observable accessibility. All of our clients should be in a position to make effective use of our products and solutions, regardless of their individual needs and backgrounds.

The action areas are explained in greater detail on the following pages.



1 Awareness-Raising, Communication, Public Relations

As a part of society, Commerzbank seeks to make its contribution towards achieving the seventeen United Nations Sustainable Development Goals. A key concern in this regard is the promotion of inclusion. Our primary goal is to firmly anchor the topic of inclusion in our diversity strategy, as it forms an indispensable element of our efforts on behalf of sustainability. Already in 2022, we set ourselves the target for future sustainability reporting of always achieving a rate well above the legally required proportion of workers with severe disabilities, which stands at five percent. The steps taken to achieve this are:

- Our aim is to raise awareness of inclusion, particularly among the external public, and to describe the initiatives we have taken. On our external sustainability portal, since mid-2023 we have been reporting on inclusion and accessibility under a heading dedicated to these topics. Going forward, we will continue to build upon this effort.
- We continue to actively emphasise the topic of inclusion as an important dimension in our consultations with institutional investors.
- We foster an open and sensitive approach to inclusion in our in-house communications. We will also provide information and promote awareness, particularly on the part of our managers, in the context of events.
- We consistently create an inclusive work environment and encourage employees with disabilities or health-related restrictions to address these openly. Thanks to our many years of experience in diversity management, we know that an open approach to dimensions of diversity bolsters the sense of belonging as well as innovation, productivity and self-esteem.
- In the future, we will regularly present awards in recognition of exemplary dedication to topics of inclusion within our company with an award category dedicated to these efforts (for example training, hiring, continued employment, optimisations in technology). In this way, we will raise the visibility of inclusion practices within the Group while promoting a culture of learning from one another.



2 Workplace Design, Employment

We will continue to pursue our goal of offering people with disabilities a job that is best suited to their proficiencies and inclinations. The Inclusion Resources Team supports our employees, for example by providing contact persons, clarifying basic questions and forwarding suggestions and ideas to the responsible units. The steps taken to achieve this are:

- We continue to make use of new technological opportunities to design a working environment that is well-suited to our employees.
- Wherever possible, we adapt workplaces individually to make it possible for employees with health restrictions to remain employed with us in line with their qualifications and restrictions. This affects the equipment and requirements for the respective position as well as the workplace itself.
- We continue to make sure that our position openings and our recruitment processes motivate people with disabilities to choose the Commerzbank Group as their employer.
- We bring even greater dedication to integrating knowledge and requirements around diversity & inclusion in the context of new recruitment of executives and development measures for executives.
- We qualify managers to deal with employees' health problems in appropriate ways and to provide relevant information about our company's offerings in this regard.
- We seek external advice on the topic of inclusion, for example from our company physicians as well as integration offices and service providers specialising in integration.
- We make use of in-house integration management to develop any necessary measures that can be conducive in the event of a health restriction in the workplace. We seek internal solutions or suitable modifications to any previous tasks that can no longer be performed due to health reasons.
- We will redouble the assistance, advice and/or relief we provide to teams in the event that employees' health restrictions create additional burdens for the affected teams.



3 Training, Education, Qualification

Commerzbank strives to achieve a clear positioning as an inclusive employer that actively appeals to and attracts applicants with disabilities. In recent years, awareness has grown of the need for a flexible approach to the recruitment of people with disabilities as part of the effort to accommodate individual needs. The steps taken to achieve this are:

- In our future employer campaigns, we will continue to project an identity of welcoming applicants with disabilities. We also publish position openings on portals used predominantly by applicants with disabilities.
- We are systematically bolstering the opportunities offered to young people with disabilities in the initial labour market. We make professional careers

and continuing education available to all employees – including explicitly for people with disabilities.

- We are increasingly encouraging our employees to take part in information and qualification offers around the topics of health and inclusion, such as in connection with the worldwide 'Day of Inclusion'. We offer a wide range of topics through our modern learning platform.
- Where opportunities and events in continuing education are concerned, we keep considerations of accessibility in mind whenever we launch new concepts or revise existing ones. This is how we intend to ensure that all employees can take part, regardless of any restrictions.



4 Health Management, Prevention, Rehabilitation

In a digital and rapidly evolving employment setting, with a diverse workforce, health is a dynamic process. A person's well-being and health are a function of striking a personal balance between external demands and one's own resources. More than 90 percent of all disabilities only occur in the course of a person's life. Hence, essentially everyone throughout the population (and thus in the workforce) can find themselves faced with the fact that their own personal working and private lives are subject to considerable restrictions at times. Many of the impacts that this entails can be mitigated or avoided with the aid of preventive health care. The steps taken to achieve this are:

- We promote our employees' awareness of health-related topics with our workplace health management and preventive counselling services.
- With modern health management, we pursue the goal of promoting, maintaining or restoring the physical and mental health of our employees. At the same time, the effort is to identify risks early on, and to counteract the effects of stress. This expressly includes the provision of assistance to employees whose circumstances are rendered more difficult as a result of disabilities.



- We coordinate measures in workplace health management involving behavioural prevention with health promotion and the development of personal resilience on the part of our entire workforce.
- In cooperation with the respective stakeholders – such as the occupational safety team, employee committees and managers – we always devise individually tailored solutions to overcome barriers in working life for people with special requirements. It makes no difference whether the restrictions are physical, psychological or mental in nature.
- We are mindful of accessibility in the services offered by our health care providers. Our service provider for the Employee Assistance Program, our holistic programme for the promotion of our employees' health, offers consultations in sign language as well as via chat. Videos contain subtitles, and we offer transcriptions for audio formats. Our intranet as well as our in-house portals and platforms, are optimised for

Screenreader, which is a program used to read content, and can also be operated using a keyboard, which is beneficial for our employees with motor impairments.

- We sustainably promote and support our employee networks, offering an opportunity for informal interaction and using any suggestions gained for our organisation. Above all, the network IDEAL for people with disabilities, the HORIZON network for those suffering from burnout and those suffering from addiction all promote awareness of inclusion and diversity through their ongoing educational outreach.
- We want to integrate the idea of inclusion in sport, including people with disabilities in regional company sports teams and in our regular national sporting events. This is how we practice active coexistence.
- We are involved in internal and external panels of experts as well as other topic-based initiatives, where we actively contribute our ideas.



5 Structural Framework Conditions, Mobility

The design and adaptation of buildings and public spaces plays a decisive role in creating an accessible environment in which people with varying disabilities can play an equal role in social life. This means designing buildings and accesses in such a way that they can be used by people with motor, visual and other impairments in the same way as they are used by everyone else. The steps taken to achieve this are:

- Our goal is to create the best possible access in renovations and new construction and to have a significant majority of our branches barrier-free by 2030. In 2023, two-thirds of our branches are already accessible to people with disabilities. These branches can already be seen in the branch search within Commerzbank Online Banking.
- We are also gradually installing guidance systems for the vision-impaired in our self-service zones as well as specifically in the lobbies of our bank branches.
- Wherever possible, we intend to anchor and fulfill inclusion requirements as a standard feature of our construction projects and in rented buildings and office space, even where this is not required by law.
- Our construction planning implements all of the requirements of workplace rules. This includes, for example, the requirement that all barrier-free toilet facilities in our buildings be reachable with the shortest possible distances, and that we will always factor barrier-free toilet facilities in future plans for new construction.



6 Strengthening Accessibility

Accessibility enables everyone to make independent and unimpeded use of surroundings, products and services, not just in their daily work and business lives but in everyday life generally.

Accessibility fosters participation and diversity and a shared coexistence in a spirit of equality. Hence, inclusion is not just a fundamental human right – as defined by the United Nations – but also a requirement and a responsibility taken seriously by all employees at Commerzbank. The German Accessibility Enhancement Act was passed in 2021. We plan to make our digital banking offer barrier-free by the time this law enters into force in 2025. Products and services are deemed barrier-free if they can be perceived, operated, understood and reliably used by people through at least two sensory channels. The steps taken to achieve this are:

- We pursue the goal of barrier-free use of our mobile apps, our online banking and our self-service devices such as ATMs and banking terminals.
- We strive to achieve the highest possible standard for barrier-free use in our efforts to further develop our digital offerings for clients. The IT solutions that this involves can also lead to applications with a higher level of overall user-friendliness. This will ultimately benefit all users.
- We are establishing binding accessibility standards for the development and purchase of new software and application products. We have adopted a software ergonomics policy with this in mind.
- In the design of our client telephony, we will examine the use of suitable technologies, consulting with groups of experts in the effort to achieve the most accessible communication possible with our clients.
- We are examining the points at which the requirements of the German Accessibility Enhancement Act can also be implemented in other areas of the bank – above and beyond the requirements of law.
- We have dedicated ourselves to the use of inclusive language, which is also an element of barrier-free communication. By recommending an inclusive, i.e. barrier-free, value-free and gender-appropriate approach to language, we offer our employees guidance for the drafting of texts.
- At times, everyday banking language can prove very complex and not easy for everyone to understand. As part of our effort to make explanations more inclusive for our clients, we strive to achieve a simplified level of language in the information we provide on how banking services work – for example through easy-to-understand explanatory videos about our services and products.





Including holiday recreational activities with IG Klettern München und Südbayern e.V., funded by the Commerzbank Foundation

7 The Bank's Social Commitment

In 2019, a detailed framework agreement with the Cooperative of Workshops for Persons with Disabilities instituted a requirement, that persons with disabilities would be deployed on our premises in the context of projects. Two projects, in Düsseldorf and Berlin, demonstrated

that this approach was a success for both parties. In the years to come, we would like to promote and expand these opportunities even more strongly as we continue to breathe life into our social responsibility. The steps taken to achieve this are:



- Sustainable purchasing and procurement requires and promotes the active design of partnership-based cooperation on behalf of inclusion. In 2021, Commerzbank anchored Diversity & Inclusion Standards in its standards for sustainable procurement, making them part of the binding, bank-wide guidelines for the purchase of goods and services.
- As a consequence, we are heightening the awareness in our Purchasing Department and among our employees to make greater use of inclusive service providers and enterprises with a special social mission of employing a workforce at least 30 percent of which consists of severely disabled persons.
- Working with the Commerzbank Foundation, we have been dedicated to the topic of inclusion and diversity throughout Germany for many years. This independent corporate foundation supports non-profit institutions, initiatives and projects that permit sustainable active participation in society for all, and for disadvantaged people in particular. We would like to further strengthen this commitment and promote it externally, in the process fostering a sense of personal social commitment that extends beyond our workforce.

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Disclaimer

The scope of application of the Commerzbank Action Plan Inclusion 2.0 is Germany.
In the international context, it serves as a guide to efforts in this regard

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