



GRI Content Index 2025

Report in accordance with the GRI Sustainability Reporting Standards
Commerzbank AG

GRI Content Index in accordance with GRI Sustainability Reporting Standards



Commerzbank AG has reported in accordance with the GRI Standards for the period 01.01.2025 - 31.12.2025. GRI 1: Foundation 2021 applied. All information as well as reason and explanation for omitting individual requirements are listed in the GRI content index.

For the reporting year 2025, Commerzbank again prepared a Group Sustainability Report in accordance with the Corporate Sustainability Reporting Directive (CSRD).

To avoid double reporting and continue to create full transparency on sustainability issues, Commerzbank accordingly publishes its report in accordance with the GRI Sustainability Reporting Standards exclusively as an index report.

The selection of material topics we report on is largely based on the results of our double materiality analysis in accordance with the requirements of the European Sustainability Reporting Standards (ESRS). To ensure consistency with our previous years' GRI reporting, we also publish information on issues that are considered insignificant in our CSRD reporting.

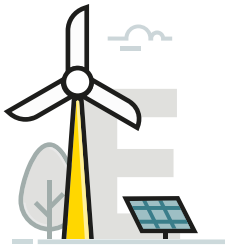
In the GRI content index, we also show how our activities support the achievement of United Nations Sustainable Development Goals (SDGs) and correspond to the United Nations Global Compact.



Our understanding of sustainability



Sustainability and ESG are widely used terms. Sustainability describes a forward-looking perspective in which environmental, social and economic aspects are considered over the long term in order to preserve the foundations of life and business for future generations. In the corporate and financial sectors in particular, these aspects are commonly summarized under the term ESG (Environmental, Social and Governance). Sustainability is defined differently across regulatory, scientific, and economic contexts. Regulatory requirements, such as the [EU Taxonomy](#) or the EU Sustainable Finance Disclosure Regulation, provide a framework for individual sustainability aspects while leaving room for company-specific specification. The specific meaning of sustainability for Commerzbank AG's products, services, and business activities is set out in the [ESG Framework](#). It defines the relevant criteria and distinguishes, in particular, between the Bank's own business and external client investment and insurance business, including asset management and securities business ("third-party business").



Protecting the environment and climate, as well as using natural resources responsibly and efficiently, are key elements of the environmental dimension of sustainability.

The social dimension particularly covers responsibility towards employees, customers, business partners, and society.



The governance dimension covers responsible corporate governance, compliance with laws and internal requirements, as well as transparent and ethical business processes.

Statement of use	Commerzbank AG has reported in accordance with the GRI Standards for the period 01.01.2025 – 31.12.2025.
GRI 1 used	GRI 1: Foundation 2021

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
General Disclosures							
The organization and its reporting practices							
GRI 2: General Disclosures 2021	2-1 Organizational details	9		As a universal bank, Commerzbank offers a comprehensive portfolio of financial services through its two business segments – Corporate Clients and Private and Small-Business Customers. With a presence in more than 40 countries, Commerzbank is represented wherever its SME, large corporate and institutional customers need it. The Bank also supports international customers with a business relationship to Germany, Austria and/or Switzerland and companies in selected future-oriented industries. With invested assets of more than 400bn, Commerzbank is also one of the leading banks for private and small-business customers in Germany. • Annual Report, shareholder structure and analyst recommendations • Annual Report, structure and organization			
	2-2 Entities included in the organization's sustainability reporting			This content index for sustainability reporting in accordance with the standards of the Global Reporting Initiative (hereinafter also referred to as the GRI Index) basically refers to the scope of consolidation of the Commerzbank Group Sustainability Report. Any exceptions are indicated in the respective places accordingly. • Group Sustainability Report, [BP-1] • Annual Report, Other information (72) Holdings in affiliated and other companies			
	2-3 Reporting period, frequency and contact point			Our Group Sustainability Report for the 2025 reporting year was, once again, prepared in accordance with the European Sustainability Reporting Standards (ESRS), the reporting standards for the Corporate Sustainability Reporting Directive (CSRD) and published as part of the management report of the Commerzbank Group. Since the reporting year 2014 we have published an annual update of our report in accordance with the GRI Sustainability Reporting Standards. To avoid redundancies to the greatest extent possible, we are publishing our GRI report for the reporting year 2025 once again exclusively as an index report with references to the Group Sustainability Report, the Sustainability Portal and the Annual Report of Commerzbank. • Contact us for any questions about this GRI index: nachhaltigkeit@commerzbank.com • Assurance Report of the independent German Public Auditor			
	2-4 Correction of Restatements of information			Where possible, information was not restated. We prepared our Group Sustainability Report in accordance with the ESRS for the first time for the 2024 reporting year and again for the 2025 reporting year. As part of the transition to CSRD-compliant reporting, isolated changes were made to our sustainability reporting. • Group Sustainability Report, [BP-2]			
	2-5 External assurance			Commerzbank's Group Sustainability Report referenced in this GRI Index was subject to a limited assurance engagement by the audit firm KPMG. We subjected our ESG Framework to an external review by ISS-Corporate and obtained confirmation. The results were documented in an External Review. Additionally, Commerzbank AG's carbon footprint (Scope 1, 2 and 3) is independently verified by the DQS certification body. • Assurance Report of the independent German Public Auditor • ESG framework, external review • Verification Statement of Environmental and Energy Data			

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
Activities and workers							
GRI 2: General Disclosures 2021	2-6 Activities, value chain and other business relationships	9		• Annual Report, Structure and organization • Annual Report, Key figures • Group Sustainability Report, [SBM-1] • Annual Report, Economic conditions	No		
	2-7 Employees	8		• Group Sustainability Report, [SBM-1] • Group Sustainability Report, [S1-6]	No		
	2-8 Workers who are not employees				Yes	Not applicable	The proportion of staff who are not employees is negligible/insignificant compared to the total workforce.
Governance							
GRI 2: General Disclosures 2021	2-9 Governance structure and composition	16		• Group Sustainability Report, [GOV-1] • Annual Report, Report of the Supervisory Board • Annual Report, Declaration on corporate governance • Commerzbank Webpage, Management	No		
	2-10 Nomination and selection of the highest governance body	5, 16		• Annual Report, Declaration on corporate governance	No		
	2-11 Chair of the highest governance body			• Annual Report, Report of the Supervisory Board • Annual Report, Declaration on corporate governance	No		
	2-12 Role of the highest governance body in overseeing the management of impacts	16		• Group Sustainability Report, [GOV-1] • Group Sustainability Report, [SBM-2] • Annual Report, Report of the Supervisory Board • Annual Report, Group Risk Report, Risk-oriented overall bank management	No		
	2-13 Delegation of responsibility for managing impacts	16	7, 8	• Group Sustainability Report, [GOV-1]	No		
	2-14 Role of the highest governance body in sustainability reporting			• Group Sustainability Report, [GOV-2]	No		
	2-15 Conflicts of interest			• Annual Report, Declaration on corporate governance • Annual Report, Report of the Supervisory Board • Commerzbank Webpage, Management	No		
	2-16 Communication of critical concerns	16	1, 2, 10	• Group Sustainability Report, [S1-3] • Group Sustainability Report, [G1-1] • CRR Disclosure Report, Annex 4	No		
	2-17 Collective knowledge of the highest governance body	16		• Annual Report, Declaration on corporate governance • Group Sustainability Report, [GOV-1]	No		
	2-18 Evaluation of the performance of the highest governance body			• Annual Report, Declaration on corporate governance • Remuneration report, VII. Targets and target achievement for the 2025 financial year	No		
	2-19 Remuneration policies	8	3, 6	• Group Sustainability Report, [GOV-3] • Remuneration report	No		
	2-20 Process to determine remuneration	8	3, 6	• Group Sustainability Report, [GOV-3] • Remuneration report	No		
	2-21 Annual total compensation ratio	8	3,6	• Group Sustainability Report, [S1-16]	No		

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
Strategy, policies and practices							
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy			• Group Sustainability Report, [SBM-1] • ESG Framework, Introduction	No		
	2-23 Policy commitments	12, 13, 15, 17	1, 2, 6, 7, 8, 10	• Group Sustainability Report, [GOV-4] • Group Sustainability Report, [E1-2] • Group Sustainability Report, [S1-1] • Group Sustainability Report, [S4-1] • Group Sustainability Report, [G1-1] • Position on Human Rights • Policy Statement on human rights and environmental due diligence • Sustainability Webpage, Sustainable Development Goals	No		
	2-24 Embedding policy commitments	16, 17	7, 8	• Group Sustainability Report, [GOV-1] • Group Sustainability Report, [GOV-2] • Group Sustainability Report, [SBM-1] • Group Sustainability Report, [E1-2] • Group Sustainability Report, [S1-13] • Group Sustainability Report, [G1-1]	No		
	2-25 Processes to remediate negative impacts			• Group Sustainability Report, [E1-2] • Group Sustainability Report, [E4-2] • Group Sustainability Report, [S1-3] • Group Sustainability Report, [S4-3] • Group Sustainability Report, [G1-1] • CRR Disclosure Report, Annex 4	No		
	2-26 Mechanisms for seeking advice and raising concerns	16	1, 2, 10	• Group Sustainability Report, [S1-3] • Group Sustainability Report, [G1-1]	No		
	2-27 Compliance with laws and regulations	16	1, 2, 4, 5, 7, 10	In the reporting year, no significant fines were imposed on Commerzbank AG. Information on ongoing legal proceedings at the end of 2025 can be found in the Annual Report for the 2025 reporting year. • Annual Report, Operational risk, Sub-risk types of operational risk, Legal risk • Group Sustainability Report, [S1-3] • Group Sustainability Report, [S1-17] • Group Sustainability Report, [S4-3]	No		
	2-28 Membership associations	17		• Registration entry in the lobby register (german only) • Sustainability Webpage, Memberships & Initiatives • Sustainability Webpage, Political dialouge	No		
Stakeholder engagement							
GRI 2: General Disclosures 2021	2-29 Approach to stakeholder engagement			• Group Sustainability Report, [SBM-2] • Group Sustainability Report, [S1-2] • Group Sustainability Report, [S4-1] • Group Sustainability Report, [S4-2] • Group Sustainability Report, [S4-3] • Group Sustainability Report, [S4-4] • Sustainability Webpage, Employee participation	No		
	2-30 Collective bargaining agreements	8	3, 6	• Group Sustainability Report, [S1-8]	No		

GRI-Standard	Disclosure	SDG	UNGC	Reference	Ommission(s)		
					Requirement(s) omitted	Reason	Explanation
Material Topics							
GRI 3: Material Topics 2021	3-1 Process to determine material topics	8		• Group Sustainability Report, [IRO-1] • Group Sustainability Report, [SBM-3]			
	3-2 List of material topics	8		The significant impacts, risks, and opportunities (IRO table) of Commerzbank, identified within the framework of the materiality analysis, were compared to the standards of the Global Reporting Initiative and form the basis of the material topics to be reported according to the standards of the Global Reporting Initiative. • Group Sustainability Report, [SBM-3]			
Biodiversity Material topics addressed: Environment - Biodiversity and ecosystems							
GRI 3: Material Topics 2021	3-3 Management of material topics			• Group Sustainability Report, [E4-1] • Group Sustainability Report, [E4-2] • Group Sustainability Report, [E4-3] • Group Sustainability Report, [E4-4]	No		
GRI 101: Biodiversity 2024	101-1 Policies to halt and reverse biodiversity loss			• Group Sustainability Report, [E4-2] • Group Sustainability Report, [E4-4]	No		
	101-2 Management of biodiversity impacts			• Group Sustainability Report, [E4-3] • Group Sustainability Report, [E4-6]	No		
	101-3 Access and benefit-sharing				Yes	Not applicable	No genetic resources or traditional knowledge associated with them are used by Commerzbank AG.
	101-4 Identification of biodiversity impacts			• Group Sustainability Report, [E4 SBM-3] • Group Sustainability Report, [E4 IRO-1] • Group Sustainability Report, [E4-6]	No		
	101-5 Locations with biodiversity impacts				Yes	Not applicable	The result of an analysis using the WWF Biodiversity Risk Filter shows that Commerzbank AG, in its direct operational business, does not engage in any activities with significant negative impacts on or dependencies on biodiversity, ecosystems, areas with particularly vulnerable biodiversity, or protected species.
	101-6 Direct drivers of biodiversity loss				Yes	Not applicable	As stated under GRI 101-5, the banking operations of Commerzbank AG have no significant dependencies on or impacts on biodiversity and ecosystems
	101-7 Changes to the state of biodiversity				Yes	Not applicable	As stated under GRI 101-5, the banking operations of Commerzbank AG have no significant dependencies on or impacts on biodiversity and ecosystems
	101-8 Ecosystem services				Yes	Not applicable	As stated under GRI 101-5, the banking operations of Commerzbank AG have no significant dependencies on or impacts on biodiversity and ecosystems

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
Indirect Economic Impacts Material topics addressed: Environment - Climate change adaptation, Climate change mitigation Social - Customer service and customer proximity Governance - Corporate culture and corporate management							
GRI 3: Material Topics 2021	3-3 Management of material topics	8, 9	1, 2, 7, 9	• Group Sustainability Report, [SBM-3] • Group Sustainability Report, [IRO-1] • Group Sustainability Report, [E1-2] • Group Sustainability Report, [E4-2] • Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-2] • Group Sustainability Report, [S4-1] • Group Sustainability Report, [S4-2] • Group Sustainability Report, [S4-4] • Group Sustainability Report, [G1-1]	No		
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	4, 10, 13	1, 8	• Sustainability Webpage, Commerzbank-Foundation • Sustainability Webpage, Education Funding • Sustainability Webpage, Cultural Promotion • Commerzbank Webpage, Ratgeber (german only) • Group Sustainability Report, [S4 SBM-3] • Sustainability Webpage, Bergwaldprojekt • Finanz-heldinnen Initiative (german only)	No		
	203-2 Significant indirect economic impacts	4, 10, 13	1, 8	• Group Sustainability Report, [E1-3] • Group Sustainability Report, [E4-3] • Group Sustainability Report, [S1-3] • Group Sustainability Report, [S1-4] • Group Sustainability Report, [S4-3] • Group Sustainability Report, [S4-4]	No		
Anti-corruption Material topics addressed: Governance - Whistleblower protection, Corruption and bribery, Prevention of money laundering and terrorist financing							
GRI 3: Material Topics 2021	3-3 Management of material topics	16	10	• Group Sustainability Report, [G1-1] • Group Sustainability Report, [G1-3]	No		
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	16	10	• Group Sustainability Report, [G1-3]	No		
	205-2 Communication and training about anti-corruption policies and procedures	16	10	• Group Sustainability Report, [G1-3]	No		
	205-3 Confirmed incidents of corruption and actions taken	16	10	• Group Sustainability Report, [G1-4]	No		

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
Tax Material topics addressed: Governance - Tax transparency							
GRI 3: Material Topics 2021	3-3 Management of material topics	16	10	• Tax Strategy • Group Sustainability Report, ESD Tax transparency	No		
GRI 207: Tax 2019	207-1 Approach to tax	16		• Tax Strategy • Group Sustainability Report, ESD Tax transparency	No		
	207-2 Tax governance, control, and risk management	16		• Tax Strategy • Group Sustainability Report, ESD Tax transparency	No		
	207-3 Stakeholder engagement and management of concerns related to tax	16		• Tax Strategy • Annual Report, Risk Report, Operational risk • Annual Report, Notes (59) Contingent liabilities	No		
	207-4 Country-by-country reporting	16		• Annual Report, Other details (68) Country-specific reporting	No		
Energy Material topics addressed: Environment - Climate change adaptation, Climate change mitigation							
GRI 3: Material Topics 2021	3-3 Management of material topics	7, 12, 13	7, 8	• Group Sustainability Report, [E1-2] • Group Sustainability Report, [E1-3] • Group Sustainability Report, [E1-4]	No		
GRI 302: Energy 2016	302-1 Energy consumption within the organization	7, 12, 13	7, 8	In the year 2025, Commerzbank AG's direct energy consumption excluding renewable energy sources was 53,020 MWh. Indirect energy consumption in the year under review was 142,640 MWh. The share of renewable energy from indirect energy consumption is 72.9 % for the 2025 reporting year. At Commerzbank AG, approximately 49.9 % of heat energy is obtained from natural gas and around 49.6 % is obtained via district heating. Heating oil as a source of heat energy was reduced to 0.4 % in Germany. No oil heating systems are operated at the international locations. The remaining 0.1% comes from thermal energy from geothermal heat. All Commerzbank sites worldwide are supplied with 100% green electricity from regional certificates of origin.	No		
	302-2 Energy consumption outside of the organization			With the 2025 Carbon Footprint, we are able to report figures for energy consumption outside the organisation for the first time. This includes electricity consumption from working from home [in GJ]. In 2025, this amounted to 10,671 GJ for Commerzbank AG.	No		
	302-3 Energy intensity		7, 8	Energy intensity represents energy consumption per full-time employee (FTE) measured in gigajoules (GJ). Commerzbank AG's total energy consumption for 2025 amounted to 705,114 GJ in 2025, with 25,992 FTEs used as the basis for the calculation. In the 2025 reporting year, energy intensity amounted to 27.13 GJ/FTE.	No		
	302-4 Reduction of energy consumption	12, 13	7, 8	• Group Sustainability Report, [E1-2] • Group Sustainability Report, [E1-3] • Group Sustainability Report, [E1-4]	No		
	302-5 Reductions in energy requirements of products and services				Yes	Not applicable	Commerzbank is no manufacturing company. Therefore, this category is not available.

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
Emissions Material topics addressed: Environment - Climate change adaptation, Climate change mitigation							
GRI 3: Material Topics 2021	3-3 Management of material topics	12, 13	7, 8	• Group Sustainability Report, [E1-2] • Group Sustainability Report, [E1-3] • Group Sustainability Report, [E1-4] • Group Sustainability Report, [E1-7] • CRR Disclosure Report, Annex 4	No		
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	3, 12,	7, 8	• Group Sustainability Report, [E1-6]	No		
	305-2 Energy indirect (Scope 2) GHG emissions	3, 12,	7, 8	• Group Sustainability Report, [E1-6]	No		
	305-3 Other indirect (Scope 3) GHG emissions	3, 12, 13	7, 8	• Group Sustainability Report, [E1-6] • CRR Disclosure Report, Annex 4	No		
	305-4 GHG emissions intensity	3, 12, 13	7, 8	In the reporting year 2025, CO2 emissions per full-time employee (FTE) amounted to 2.55 tonnes. The decrease compared with 2024 (2.76 tonnes) was primarily attributable to the reduction in energy consumption and the location strategy.	No		
	305-5 Reduction of GHG emissions	3, 12, 13	7, 8, 9	• Group Sustainability Report, [E1-3] • Group Sustainability Report, [E1-4] • Group Sustainability Report, [E1-7]	No		
	305-6 Emissions of ozone-depleting substances (ODS)				Yes	Information unavailable/incomplete	Figures are not reported by the VfU tool.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions				Yes	Information unavailable/incomplete	Figures are not reported by the VfU tool.

					Omission(s)		
GRI-Standard	Disclosure	SDG	UNGC	Reference	Requirement(s) omitted	Reason	Explanation
Supplier Environmental Assessment Material topics addressed: Environment - Climate change adaptation, Climate change mitigation							
GRI 3: Material Topics 2021	3-3 Management of material topics	12	4, 5, 7	• Group Sustainability Report, [E1-2] • Sustainability Webpage, Procurement • Procurement standard • Yellow Compass - Our Code of Conduct	No		
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	12	7	• Group Sustainability Report, [E1-2] • Sustainability Webpage, Procurement • Procurement standard	No		
	308-2 Negative environmental impacts in the supply chain and actions taken	12	7	• Group Sustainability Report, [E1-2] • Sustainability Webpage, Procurement • Procurement standard	No		
Employment Material topics addressed: Social - Work-life balance and working time Governance - Corporate culture and corporate management							
GRI 3: Material Topics 2021	3-3 Management of material topics	5, 8, 10	6	• Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-2] • Group Sustainability Report, [S1-3] • Group Sustainability Report, [S1-4] • Group Sustainability Report, [S1-5] • Group Sustainability Report, [S1-6]	No		
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	5, 8, 10		• Group Sustainability Report, [S1-6]	No		
	401-2 Benefits provided to full-time employees that are not provided to temporary or parttime employees				Yes	Not applicable	There is no significant difference between the offerings for permanent employees and temporary workers. Additionally, temporary workers make up only a very small proportion of all employees. There are fundamentally no different offerings between full-time and part-time employees.
	401-3 Parental leave	5, 8, 10		• Group Sustainability Report, [S1-15]	No		

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
Occupational Health and Safety Material topics addressed: Social - Health and safety							
GRI 3: Material Topics 2021	3-3 Management of material topics	3, 8	1, 6	• Group Sustainability Report, [S1-14]	No		
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	3, 8	1, 6	• Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-14]	No		
	403-2 Hazard identification, risk assessment, and incident investigation	3, 8		• Group Sustainability Report, [S1-3]	No		
	403-3 Occupational health services	3, 8		• Group Sustainability Report, [S1-14]	No		
	403-4 Worker participation, consultation, and communication on occupational health and safety	3, 8		• Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-2] • Group Sustainability Report, [S1-4] • Group Sustainability Report, [S1-5]	No		
	403-5 Worker training on occupational health and safety	3, 8		All internal and external employees are required to complete an online safety training seminar once a year, supplemented by a location-specific briefing provided by their managers. Young people under the age of 18 are required to complete an online safety training seminar every six months. Internal company-appointed officers such as safety officers, first-aiders, floor officers and fire protection assistants are trained in accordance with the legal requirements and regular further training is ensured. In addition, branch employees receive bi-annual training on accident prevention regulations and the special requirements of banking operations (cash processing).	No		
	403-6 Promotion of worker health	3, 8		• Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-4] • Group Sustainability Report, [S1-5] • Group Sustainability Report, [S1-14]	No		
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships				Yes	Not applicable	For a bank, the impact on occupational safety and health directly related to business relationships is insignificant/negligible.
	403-8 Workers covered by an occupational health and safety management system	3, 8		The Occupational Health and Safety Management System (Arbeitsschutz-Management-System, AMS), which is regularly reviewed internally, covers 100 % of the employees of Commerzbank Group.	No		
	403-9 Work-related injuries	3, 8		In 2025, there were a total of 100 reportable work-related and commuting accidents (incapacity to work for more than three working days). The rate of work-related accidents is 3.6 (1.3 work-related and 2.3 commuting accidents) per 1,000 people for Commerzbank Group.	No		
	403-10 Work-related ill health				Yes	Not applicable	As a financial institution, Commerzbank does not have work-related illnesses that can be documented solely as a result of an activity at the bank.

GRI-Standard	Disclosure	SDG	UNGC	Reference	Ommission(s)		
					Requirement(s) omitted	Reason	Explanation
Training and Education Material topics addressed: Social - Training and skills development							
GRI 3: Material Topics 2021	3-3 Management of material topics	4, 8	6	• Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-13]	No		
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	4, 8, 10		• Group Sustainability Report, [S1-13]	No		
	404-2 Programs for upgrading employee skills and transition assistance programs	4, 8, 10	6	• Group Sustainability Report, [S1-13]	No		
	404-3 Percentage of employees receiving regular performance and career development reviews	4, 8, 10		• Group Sustainability Report, [S1-13]	No		
Diversity and Equal Opportunity Material topics addressed: Social - Work-life balance and working time, Gender equality and equal pay for work of equal value (gender pay gap), Employment and inclusion of persons with disabilities, Diversity							
GRI 3: Material Topics 2021	3-3 Management of material topics	5, 8, 10	1, 6	• Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-2] • Group Sustainability Report, [S1-4] • Group Sustainability Report, [S1-9] • Group Sustainability Report, [S1-12] • Group Sustainability Report, [S1-15]	No		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	5, 8, 10	6	• Group Sustainability Report, [S1-6] • Group Sustainability Report, [S1-9] • Annual Report, Declaration on corporate governance	No		
	405-2 Ratio of basic salary and remuneration of women to	5, 8	1, 6	• Group Sustainability Report, [S1-16]	No		
Non-discrimination Material topics addressed: Social - Employment and inclusion of persons with disabilities, Measures against violence and harassment in the workplace							
GRI 3: Material Topics 2021	3-3 Management of material topics	5, 8, 10	1, 6	• Group Sustainability Report, [S1-1] • Group Sustainability Report, [S1-2] • Group Sustainability Report, [S1-4] • Group Sustainability Report, [S1-9] • Group Sustainability Report, [S1-12] • Group Sustainability Report, [S1-15]	No		
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	5, 8, 10, 16	1, 6	• Group Sustainability Report, [S1-17]	No		

GRI-Standard	Disclosure	SDG	UNGC	Reference	Omission(s)		
					Requirement(s) omitted	Reason	Explanation
Freedom of Association and Collective Bargaining Material topics addressed: Social - Social dialogue and freedom of association, Collective bargaining and adequate wages							
GRI 3: Material Topics 2021	3-3 Management of material topics	8	2, 3	• Group Sustainability Report, [S1-8] • Group Sustainability Report, [S1-10] • Group Sustainability Report, [S1-16]	No		
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	8	2, 3	• Group Sustainability Report, [S1-8] • Procurement standard	No		
Supplier Social Assessment Material topics addressed: Social - Social dialogue and freedom of association Governance - Corporate culture and corporate management							
GRI 3: Material Topics 2021	3-3 Management of material topics	12	1, 2, 4, 5	• Group Sustainability Report, [E1-2] • Sustainability Webpage, Procurement • Procurement standard • Yellow Compass - Our Code of Conduct	No		
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	8, 12	1, 2	• Group Sustainability Report, [E1-2] • Sustainability Webpage, Procurement • Procurement standard	No		
	414-2 Negative social impacts in the supply chain and actions taken	8, 12	1, 2	• Group Sustainability Report, [E1-2] • Sustainability Webpage, Procurement • Procurement standard	No		
Public Policy Material topics addressed: Social - Social dialogue and freedom of association							
GRI 3: Material Topics 2021	3-3 Management of material topics	16	1, 8, 10	• Sustainability Webpage, Public Affairs	No		
GRI 415: Public Policy 2016	415-1 Political contributions	16	10	As a company, Commerzbank does not make donations to political parties or organizations with a political background. Accordingly, party donations from Commerzbank amount to 0 euros. The associations in which Commerzbank is a member, donate on their own responsibility and in accordance with the respective legal rules, in particular in compliance with party laws. Information on financial expenses in the area of interest representation can be found in the register entry in the lobby register. • Register entry in the lobby register (German only)	No		

					Omission(s)		
GRI-Standard	Disclosure	SDG	UNGC	Reference	Requirement(s) omitted	Reason	Explanation
Marketing and Labeling Material topics addressed: Social - Customer satisfaction, Customer service and customer proximity, Quality and complaints management, Product responsibility							
GRI 3: Material Topics 2021	3-3 Management of material topics	9, 12	8, 10	• Group Sustainability Report, [S4 SBM-3] • Group Sustainability Report, [S4-1] • Group Sustainability Report, [S4-2] • Group Sustainability Report, [S4-3] • Group Sustainability Report, [S4-4] • Sustainability Webpage, Private and Small Business Customers	No		
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	12		• Group Sustainability Report, [S4-1] • Group Sustainability Report, [S4-2] • Group Sustainability Report, [S4-3] • Group Sustainability Report, [S4-4]	No		
	417-2 Incidents of non-compliance concerning product and service information and labeling	12		No significant incidents of non-compliance concerning product and service information and labeling were identified at Commerzbank AG for the 2025 reporting year.	No		
	417-3 Incidents of non-compliance concerning marketing communications	12		No significant incidents of non-compliance concerning marketing communications were identified at Commerzbank AG for the 2025 reporting year.	No		
Customer Privacy Material topics addressed: Social - Data Protection							
GRI 3: Material Topics 2021	3-3 Management of material topics	16	1	• Group Sustainability Report, [S4 SBM-3] • Group Sustainability Report, ESD Data protection	No		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	16	1	• Group Sustainability Report, ESD Data protection	No		



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