

# Combined separate non-financial report

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## About this report

This combined non-financial report for Commerzbank Aktiengesellschaft and the Commerzbank Group<sup>1</sup> has been prepared in accordance with the requirements of the German Act on Strengthening Corporate Non-Financial Reporting (CSR-Richtlinie-Umsetzungsgesetz, CSR-RUG). Alongside the parent company, it covers in particular the material subsidiaries according to the risk inventory, Commerz Real AG, mBank S.A. and Commerzbank Finance & Covered Bond S.A.

As required by law, we provide information in this report on environmental protection, treatment of employees, social

responsibility, respect for human rights and the fight against corruption and bribery. As customer focus is key factor in our success, we also report on the treatment of customers. To identify the topics to report on, we conducted a materiality analysis of non-financial issues that are key to understanding the business performance and situation of Commerzbank and that are significantly impacted by our business activities (see section "Key topics analysed"). The description of the business model can be found in the "Structure and organisation" section of the (Group) management report. Apart from the description of the business model, references to further information in the management report do not form part of this non-financial report. Other references to information outside the management report are marked accordingly.

<sup>1</sup> Unless stated otherwise, the information in this report relates to the Group.

The directives stipulated by Commerzbank Aktiengesellschaft apply to the entire Group because it is defined as the “global functional lead”. If relevant arrangements at the subsidiaries differ from these policies, these arrangements are explained in this report. Commerzbank Finance & Covered Bond S.A., which as at the end of 2023 had around 30 remaining employees and was exclusively managing a run-off portfolio, did not have any additional information to contribute on material non-financial issues in 2023.

No new material non-financial risks were identified as part of the annual risk inventory that had not already been taken into sufficient account in the Bank’s risk management. We are not aware of any material risks in this regard, either from the Bank’s own business activities or in connection with business relations, products or services, that would be highly likely to have a severe negative impact on the non-financial aspects, now or in the future. Further information on our risk management can be found in the Group risk report.

In the interests of providing focused information to the recipients of our financial reporting, we have refrained from using a reporting framework. Nevertheless, this non-financial report is guided by the standards of the Global Reporting Initiative (GRI) where relevant for the defined issues. Detailed information on the sustainability work of Commerzbank Aktiengesellschaft is also presented in the GRI sustainability reporting, which is available online. In this non-financial report, we take into account the requirements of the Task Force on Climate-related Financial Disclosures (TCFD), of which we have been a member since 2020 (see table “TCFD recommendations in the non-financial report” on page 78 f.). This year, we are also aligning ourselves for the first time with the requirements of the Taskforce on Nature-related Financial Disclosures (TNFD), which we joined in April 2023 (see table “TNFD recommendations in the non-financial report” on page 80 f.). We have also included information required by the EU Taxonomy Regulation. Our progress report on the Principles for Responsible Banking of the United Nations Environment Programme Finance Initiative (UNEP FI) is also integrated into this report and summarised as a tabular index at the end of the report.

The United Nations Sustainable Development Goals (SDGs) form a further basis for our sustainability efforts. In this report, we show how our activities support the achievement of these global sustainability goals (see SDG symbols at the start of the relevant section). Financing renewable energy, for example, contributes towards SDG 7, which seeks to ensure access to affordable and clean energy. A detailed overview of our contribution to target achievement can be found in the sustainability section of Commerzbank’s website.

This non-financial report was subject to a limited assurance engagement performed by the auditing firm KPMG in accordance

with ISAE 3000 (Revised)<sup>2</sup>. The report on the engagement can be found in the Group’s Annual Report under “Further information”.

## 1. Taking responsibility

Our society is facing challenges from multiple sides. 2023 was overshadowed by the ongoing Russian war of aggression in Ukraine, Hamas’ terrorist attack on Israel, a deteriorating German economic climate and devastating natural disasters. In times when society and the economy are fighting an uphill battle, it is more important than ever that we stand by our customers.

In our ESG framework, we disclose all the key building blocks of our sustainability strategy. It is where we bundle all the information relevant to our stakeholders on sustainability issues in the customer business, on our sustainable product solutions as well as on our guidelines and exclusion criteria. Transparency and fairness towards our customers are cornerstones of doing business sustainably. Treating our employees responsibly – even and especially at times of economic challenges and great upheaval – is another.

With our net zero commitment – i.e. the promise to reduce our carbon footprint to net zero – we as a financial intermediary are driving sustainability. We follow binding rules for dealing with environmental and social risks, which we continuously review and adapt as necessary. We have a clear position on controversial topics such as fossil fuels, arms, deforestation and mining.

In the following, we explain in detail how we specifically fulfil our responsibility towards the environment, society, our customers and employees, which successes we have achieved in the year under review and what we are still working on. We outline what matters to us and what we stand for. The chart “Milestones in 2023” summarises our key activities, which we discuss in the body of the report. To highlight our progress in the individual areas, we specify strategic KPIs (key performance indicators) and other key figures.

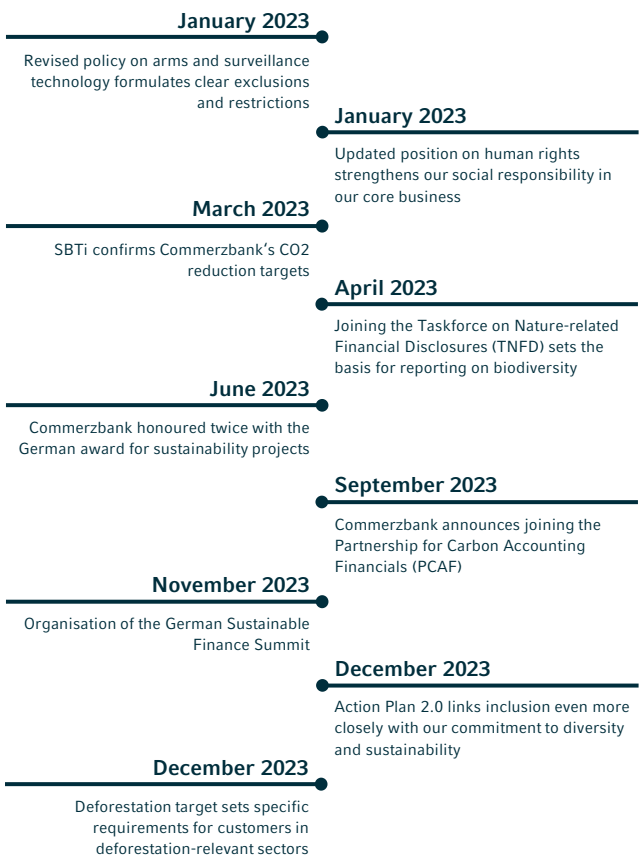
Our sustainability rating and ranking results and our inclusion in the relevant indices demonstrate that we are on the right track. In 2023, major rating agencies for sustainability gave Commerzbank Aktiengesellschaft ratings that were mainly positive. For example, Sustainalytics gives us a “medium risk” rating, while CPD rates us “B”. In S&P Global’s Corporate Sustainability Assessment, Commerzbank achieved a score of 54 – an improvement of 8 points on the previous year. In addition, we continue to be listed in sustainability indices such as FTSE4Good. On top of this, two of our projects received the German Award for Sustainability Projects 2023 in the year under review: specifically, the ESG framework and the environmental internship. Out of the total 283 nominations received, Commerzbank scored top marks

<sup>2</sup> External sources of documentation referred to in the combined separate non-financial report or the “Principles for Responsible Banking” progress report did not form part of the limited assurance engagement by KPMG.

from the jury, composed of representatives from science, business and the media, in the categories “Strategy – Large companies” and “Teaching / education”. Our subsidiary neosfer was also recognised for its Impact Solutions platform. An overview of the ratings and awards can be found in our Sustainability Factsheet, which is published online and constantly updated.

Our subsidiary mBank also performs well in this respect: MSCI ESG rated mBank as “A” during the year under review, while Sustainalytics assessed its risk profile as “low”. mBank is also listed in the WIG-ESG index of the Warsaw Stock Exchange.

Milestones in 2023



2. Anchoring sustainability in our strategy

The transformation into a sustainable economy affects our customers and ourselves in equal measure. We want to play an active role in shaping this change. Sustainability has been an integral part of our corporate strategy since as far back as 2020. The “Strategy 2027” published in November 2023 is based on the three pillars of growth, excellence and responsibility. Responsibility represents the entire sustainability spectrum of environmental, social and governance.



The United Nations Sustainable Development Goals (SDGs) and the Paris climate target of limiting global warming to well below 2°C provide the framework for our work. To this end, we are constantly expanding our range of innovative, environmentally friendly products and our sustainable solutions for customers. We are also driving forward the sustainable transformation of our banking operations. Our sustainability strategy is grounded in our commitment to combating climate change. With that in mind, we have set ourselves ambitious net zero targets and are pursuing these with consistency and conviction. In addition, we tackle issues that are moving into the focus of the sustainability debate, such as biodiversity protection and a resource-conserving circular economy. We need to find strategic solutions to these issues in conjunction with our customers.

Our commitment to sustainable transformation is also made clear by our voluntary undertakings. For example, we were one of the first signatories of the Net-Zero Banking Alliance of the United Nations Environment Programme Finance Initiative (UNEP FI). By joining the “Taskforce on Nature-related Financial Disclosures” (TNFD) in 2023, we have underlined our resolve to make an active contribution to preserving biodiversity. An overview of all our memberships in the field of sustainability is published online.

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## Governance structures consolidated

Among other matters, the Supervisory Board advises and monitors the Board of Managing Directors with regard to sustainability issues. This includes, for example, checking this non-financial report. The Environmental, Social and Governance Committee (ESG Committee) generally meets four times a year. Together with the Audit Committee, it assists the Supervisory Board in assessing whether the management is ensuring the economically viable and sustainable performance of the Bank while also observing the principles of responsible corporate governance, fulfilling the Bank's social responsibility and at the same time conserving natural resources. The ESG Committee also advises the Board of Managing Directors on ESG issues.

As part of the optimisation of the remuneration system for the Board of Managing Directors, the Supervisory Board has linked Commerzbank's sustainability strategy to the variable remuneration of members of the Board of Managing Directors in a binding manner by adding an explicit ESG sub-target within the Group target, accounting for 20% of Group target achievement. The Group target itself accounts for the majority (60%) of variable remuneration for members of the Board of Managing Directors. As a result, ESG targets have been explicitly embedded in the variable remuneration system since the 2023 financial year for all members of the Board of Managing Directors via the Group target. They complement any other ESG targets within the department and individual targets that may have already been in place in previous years. Alongside other ESG criteria, the Bank's sustainability targets are also embedded in the remuneration system for our employees as target criteria. As an integral component of the qualitative targets, these criteria – together with target achievement in the quantitative element – determine the amount of variable remuneration in the non-pay-scale remuneration model.

The Board of Managing Directors develops the Commerzbank Group's strategy, discusses it with the Supervisory Board and ensures it is implemented. Sustainability issues are included in the annual strategy process for the overall bank strategy and are discussed as required in meetings of the Board of Managing Directors. Each member of the Board of Managing Directors is responsible for implementing sustainability measures within their own divisional remit.

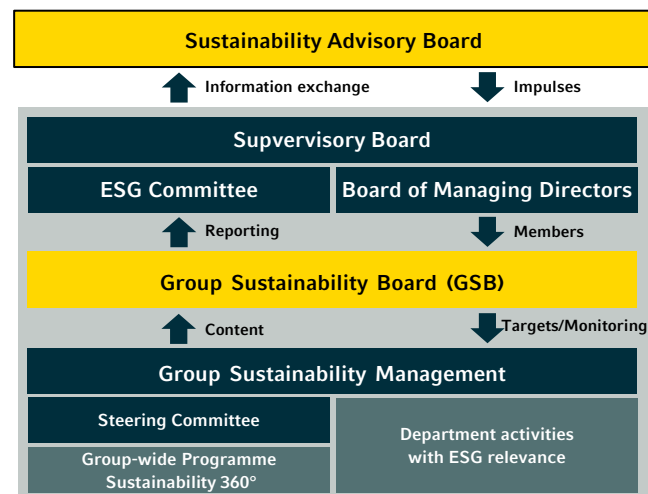
**The Group Sustainability Board enables holistic management of the Bank's sustainable orientation**

The central sustainability management function reports to the Chairman of the Board of Managing Directors and regularly

informs him about progress on sustainability issues and activities. A cross-divisional decision-making and escalation body for sustainability enables the sustainable orientation of the business model to be managed holistically. With this Group Sustainability Board, we have firmly embedded the wide-ranging issue of sustainability within the Bank's organisation. The board sets the Bank's strategic sustainability targets and monitors the measures for their implementation and management. In addition, the divisions and segments report regularly on the progress of their sustainability activities and the implementation of regulatory sustainability requirements. The Group Sustainability Board is chaired by the Chairman of the Board of Managing Directors. The Board also includes other members of the Board of Managing Directors and heads of divisions.

By making Group Sustainability Management the overarching sustainability area within the strategy unit, Commerzbank is underlining the strategic priority of this topic. It is responsible for the ongoing development of the sustainability strategy and comprehensive governance. At the same time, Group Sustainability Management manages the "Sustainability 360°" Group-wide programme and thereby coordinates the sustainability work of Commerzbank in an overarching way. It also ensures the implementation of strategic sustainability initiatives such as the Principles for Responsible Banking of the UNEP FI.

The external Sustainability Advisory Board, led by the Chairman of the Board of Managing Directors, ensures a constructive and critical dialogue with our stakeholders. The six experts from the fields of politics, academia, society, NGOs, trade unions and SMEs represent a broad spectrum of content. Previous meetings included the discussion of topics such as the circular economy, biodiversity and social sustainability. The input from the Sustainability Advisory Board supports us in the further development of our sustainability strategy.



Under the three lines of defence approach, ESG risks are viewed as a horizontal type of risk and are therefore managed across various control units at the Bank. Group Sustainability Management also acts the second line of defence for social (S) and governance (G) risks, serving as a central point of oversight. Environmental (E) risks are dealt with within the risk control function. The Chief Environmental Risk Officer (CERO) and the associated Environmental Risk Control unit deal specifically with climate and biodiversity risks. Together, these two units monitor the impact of ESG risks on the Bank's risk profile.

The relevance of sustainability is also reflected in Commerz Real's organisational structure. A central department for strategic sustainability issues began its work in May 2023. This Centre of Competence Sustainable Transformation & Strategy is part of the Real Estate Asset Management & Sustainability (RE-AMS) division. The department is responsible for devising the sustainability strategy of Commerz Real and its subsidiaries, and also supports and monitors the operational implementation of this strategy. The department management reports to the general representative for RE-AMS, who in turn reports on sustainability issues directly to the Board of Managing Directors.

At mBank, the Sustainable Development Committee, chaired by the Chief Risk Officer, is responsible for managing sustainability. It coordinates sustainability activities and proposes them to the Board of Managing Directors. The committee also monitors the implementation of the ESG strategy and the progress of ESG initiatives, and approves related measures. Furthermore, the Board of Managing Directors maintains regular dialogue with the Supervisory Board on sustainability issues, while the Risk Committee of the Supervisory Board addresses sustainability matters on a quarterly basis. In addition, the evaluation of mBank's top 100 managers is partly (10%) linked to ESG targets.

### Keeping an eye on regulatory developments

Commerzbank monitors the growing number of regulatory requirements at national, international and EU levels. As part of this, Group Sustainability Management keeps an eye on developments relating to sustainability issues and coordinates implementation with the relevant units of the Bank. The aim is to further integrate sustainability and ESG risks into the Bank's strategy, governance and risk management, and to create suitable conditions for mobilising capital. The current focus of regulatory requirements is on considering the effects of climate change on business activities and on ensuring standardised disclosure of the Bank's contribution to the transformation.

Corporate responsibility also means seeking regular dialogue with external and internal stakeholders. Commerzbank maintains contact with numerous organisations and groups that have a relationship with the Bank. In addition to employees, these include above all customers, the capital market, the financial sector,

suppliers and service providers, the media, non-governmental organisations, politicians, civil society and academics.

**Corporate responsibility also means seeking regular dialogue with external and internal stakeholders**

Commerzbank also engages in regular dialogue with national and international regulatory and supervisory authorities. The Bank's aim here is to get to know the needs and interests of its stakeholders and present its own perspective. The outcome of these discussions can be incorporated into the corporate strategy as a decision-making and planning aid. For example, the Bank regularly discusses the potential impact of our business activities on human beings and the environment with non-governmental organisations. In November 2023, Commerzbank hosted one of the nine events held during the seventh Sustainable Finance Summit of the Green and Sustainable Finance Cluster Germany. The programme welcomed the banks of the Net-Zero Banking Alliance Germany and discussed the topic of climate-neutral banks as well as the key role they play in transforming the economy.

### Key issues analysed

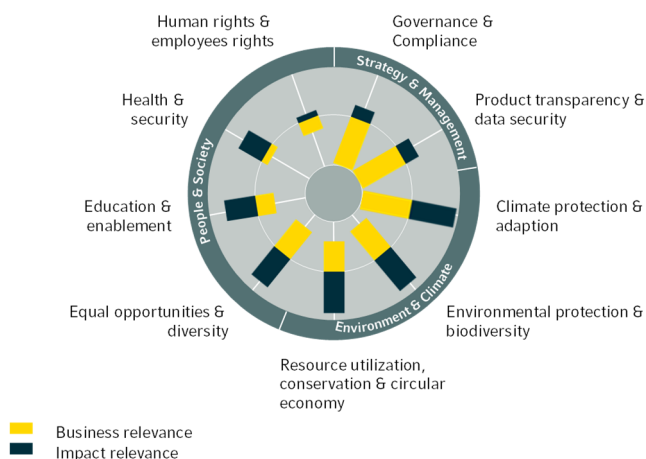
This non-financial report is based on the materiality analysis from 2022, which we used to identify the sustainability topics that are most relevant to us. For this purpose, potential sustainability topics were analysed along the two established materiality perspectives. To measure the impact perspective, we conducted an exposure analysis to reveal "sustainability hotspots". These are in countries and sectors where Commerzbank is particularly active, and where sustainability indicators in the defined areas are significantly below average. The business perspective – i.e. the question of how high the opportunities and risks of these sustainability issues are for business success – was established in a management workshop.

Nine topics are consequently material for us. They relate to all three sustainability dimensions – environmental, social and governance – and currently form the focus of our sustainability management activities. Climate change continues to have the highest relevance for the Bank. At the same time, topics such as biodiversity and circular solutions have shifted into greater focus than in previous materiality analyses. To apply the materiality analysis in the Bank's operations, the results were incorporated into the Bank-wide strategy process and discussed at the level of the Board of Managing Directors.



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## Results matrix for the materiality analysis



In mid-2023, we carried out a new materiality analysis pursuant to the requirements of the Corporate Sustainability Reporting Directive (CSRD) passed by the EU at the end of 2022. The new guideline came into force in 2023, meaning we will have to implement it for the first time from the 2024 reporting year. It therefore has no relevance for current reporting. A Group-wide project to ensure timely implementation was started in 2023. The next non-financial report will be aligned to the new CSRD requirements.

## Pursuing net zero target

Our net zero commitment is at the heart of



the sustainability strategy adopted by the Board of Managing Directors. It is based on two pillars: We support our customers in their sustainable transformations and set a good example ourselves. We are pursuing this by means of three specific targets:



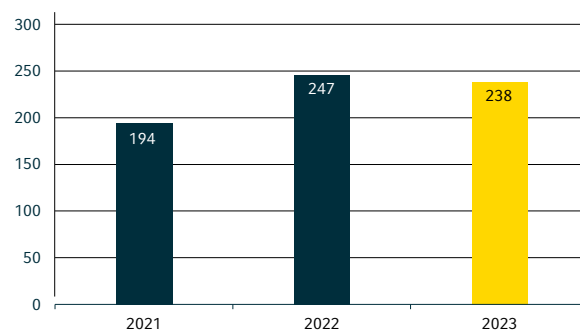
- By 2050 we are aiming for net zero CO<sub>2</sub> emissions from our entire lending and investment portfolio. To measure progress reliably, we use CO<sub>2</sub> reduction targets from the Science Based Targets initiative (SBTi). We are already using this method to

align our portfolios with the Paris Agreement and will also base our management on it from 2025 at the latest (see “Reducing financed emissions”).

- By 2025, we will mobilise €300bn for sustainable financial products. These products represent our sustainable business volume, with €100bn attributable to the Private and Small-Business Customers segment and €200bn to the Corporate Clients segment. The goal of mobilising around €300bn by 2025 takes into account not only the provision of capital, but also funds that customers were able to obtain on the capital market with the help of Commerzbank, for example via sustainable bonds and sustainable loans. In the ESG framework, we disclose the criteria we use to classify financial products as sustainable and transparently describe the composition of the sustainable business volume. In view of factors such as the evolving EU Taxonomy, we will realign the volume target accordingly. We will also further expand the range of sustainable products offered in our business divisions (see “Taking climate-related risks into account in lending” and “Sustainable investments and capital market products”). Key figure: By the end of 2023, Commerzbank Aktiengesellschaft had mobilised €238bn for sustainable financial products, out of a target of €300bn by the end of 2025.

### Volume of sustainable financial products

€bn



There was a significant increase in 2023 for sustainable bonds in particular with a total volume of €61bn. Due to a notable slowdown in sustainable financing on the credit market in 2023, the volume of new business in this area fell to €75bn compared to the previous year. The reason for this includes the tense interest rate environment and the effects of the macroeconomic downturn. A detailed overview of all products contributing to this goal can be found on page 76 (table “Composition of the €300bn target”).



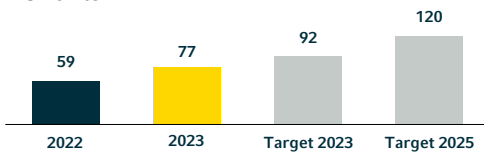
### Advisory products (no balance sheet impact, €bn)



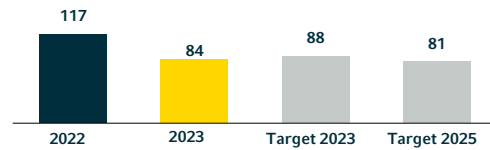
### Loan products (with balance sheet impact, €bn)

#### Corporate Clients

- Accompanied ESG bond transactions (e.g. green and social bonds)\*
- Sustainable investment solutions for Corporate Clients\*\*

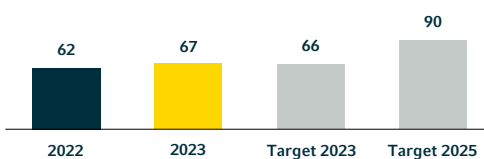


- Renewable energy loan portfolio\*\*
- Sustainability linked loans\*
- KfW sustainability linked programmes\*

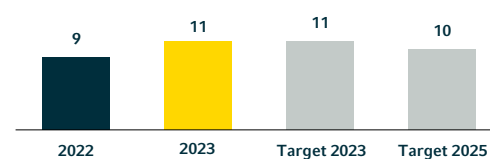


#### Private & Small-Business Customers

- Asset management, securities advisory and brokerage\*\*
- Commerz Real products\*\*
- Retirement solutions\*



- Green mortgages\*\*
- KfW programmes\*\*



\* New business. \*\* Existing business.

- We want to reduce the CO<sub>2</sub> emissions of our own banking operations to net zero as early as 2040. We already achieved our target of reducing greenhouse gas emissions at Commerzbank Aktiengesellschaft by a further 30% by 2025 versus 2018 back in 2022 – three years ahead of schedule. We expect our suppliers to be climate-neutral by 2040. Our own CO<sub>2</sub> emissions in 2023 were 76,591 tonnes (see “Reducing operational emissions”).

The status of target achievement is regularly ascertained and reported internally and externally. For target 1 – managing the portfolio based on CO<sub>2</sub> intensity, working towards net zero – we are publishing a status report for the first time in 2023 (see “Reducing financed emissions”). The Group Sustainability Board, chaired by the Chairman of the Board of Managing Directors, reviews the progress towards these three strategic sustainability targets. Our sustainability strategy is implemented within the Group programme “Sustainability 360°”. The customer segments, Risk Management and numerous other relevant Group divisions are involved in the Group-wide initiative, as is Commerz Real. The programme represents an overarching framework for all sustainability activities and ensures that cross-cutting issues are closely joined up, a coordinated approach is taken and tracking is

strict. A steering committee consisting of members of the top management of the relevant divisions monitors progress every two months. The status of the programme is regularly reported to the Board of Managing Directors.

## Organisational chart for the 360-degree strategic initiative



Commerz Real has been pursuing its Sustainable4Life sustainability strategy since 2020 and has embedded it in the business strategy in the four impact areas of Portfolio & Investments, Directives & Processes, Team & Stakeholders and Innovation & Digitalisation.

At mBank, too, the ESG agenda is a key component of the business strategy for 2021 to 2025. It is guided by the United Nations Sustainable Development Goals that are relevant for it, and by the UNEP FI Principles for Responsible Banking. The strategy sets out how mBank assumes responsibility for issues such as climate change, for the financial situation of its customers, and for society and investors. mBank has committed to achieving carbon neutrality in its direct emissions (Scope 1) and those of the energy it purchases (Scope 2) by 2030. mBank plans to become completely carbon neutral – including its loan portfolio – by 2050. To this end, in 2022 it became the first Polish bank to join the Partnership for Carbon Accounting Financials (PCAF).

This alliance enables the carbon footprint of the loan portfolio to be determined in accordance with recognised standards.

mBank is also a member of the Science Based Targets initiative (SBTi) to ensure that it implements its decarbonisation targets in line with the Paris Agreement. As part of its strategy, mBank has also undertaken to introduce at least one new ESG-compliant product per year in both the retail and corporate customer segments. For example, in 2022 it began offering Eco mortgage loans to retail banking customers for financing environmentally friendly buildings. This product is in line with the objectives of the EU Taxonomy Regulation. mBank already granted more than 700 of these loans for energy-efficient homes in 2023, with a total volume of around €85m (about 374m Polish zloty).

## 3. Responsible management

One objective agreed under the 2015 Paris Agreement was to bring global financial flows into line with climate targets. Private finance is also needed to support our efforts to gradually decarbonise the global economy. Funding for new projects and technologies is intended to reduce greenhouse gas emissions and promote climate change adaptation measures. This can be done, for example, by promoting renewable forms of energy (See “Supporting the customer transformation”) or forgoing certain transactions such as financing new coal mines or coal-fired power stations. We too want to prevent our business activities from having a negative impact on the environment and on society and to avoid or mitigate any risks that might result.

### Making our stance clear

Through our ESG framework we have made our understanding of and commitment to sustainability transparent for all stakeholders. The framework creates a Bank-wide standard that enables stringent management of all relevant products, processes and activities and ensures the sustainable transformation of Commerzbank. The focus is on our core business, specifically our customer and product portfolio. The ESG framework provides an overview of our sustainability directives and exclusion criteria. It is updated on a continual basis to reflect both regulatory developments as well as our own progress.





The Bank has formulated industry-specific requirements for controversial topics such as armaments, deforestation and fossil fuels. For example, the Fossil Fuels Policy regulates the entire coal value chain from coal production, through infrastructure, to coal-fired power generation at power plants. The value chain is also subject to comprehensive regulation for customers and the customer business from the oil and gas sector (upstream, midstream, downstream).

**The Bank has adopted a clear stance on controversial issues such as arms, deforestation and fossil fuels**

Exclusion criteria were defined for particularly critical businesses and business relationships. This includes, for example, financing for oil and gas production projects (conventional and unconventional production methods), as well as the decision not to finance new construction or expansion of coal mines, coal infrastructure or coal-fired power plants. Exclusion criteria were also defined for other areas such as nuclear power and deforestation. For years now, environmental and biodiversity aspects have been integrated into the core business by means of minimum environmental standards and corresponding exclusion criteria, and compliance with these standards has been monitored.

## Evaluating environmental and social risks

Sustainability in the core business is assessed by the Reputational Risk Management department at Commerzbank Aktiengesellschaft. We do not limit ourselves to what is legally required;

instead, we consider the legitimacy of all transactions. In view of the special risks associated with fossil fuels and armaments, the Board of Managing Directors has passed its own binding directives on these matters that define many of the relevant transactions and business relationships in these areas as being subject to assessment, and encompass exclusion criteria.

When it comes to armaments, we recognise the basic right of states to defend themselves and do not question the need for the German armed forces to exist or to be adequately equipped. We therefore continue to finance arms manufacturers who produce weapons and armament systems for the Federal Republic of Germany and its allies. Nevertheless, we have tightened and expanded the requirements and criteria for the arms industry applying to Commerzbank Aktiengesellschaft, which have been in place since 2008. The Board of Managing Directors approved the new Arms and Surveillance Technology Policy in January 2023. It



preserves the fundamental parameters of the old policy, which means that Commerzbank will not fund arms business in conflict zones or areas of tension, or business relating to what are termed “controversial weapons”. In addition, the new policy now also governs the approach in relation to autonomous weapons and surveillance technology. For example, Commerzbank does not participate in transactions or projects relating to fully autonomous weapon systems.

In December 2023, we also expanded our position in the areas of deforestation and agricultural commodities and defined new exclusion criteria. The expanded position on the forestry, soy, beef and palm oil sectors stipulates that companies from relevant and defined regions must have mandatory memberships and certifications in order to become or remain customers of Commerzbank. Existing customers must comply with these requirements by the end of 2025 at the latest.

**We are committed to respecting human rights and contribute to their promotion and protection**

Commerzbank is committed to respecting human rights and wants to help promote and uphold these within its scope influence, for example in its dealings with employees, suppliers and customers. We describe in detail how we address this matter in our Position on Human Rights. In the Reputational Risk Management department, business transactions and business relationships in sectors in which human rights play a significant role, such as mining, ship dismantling or the cotton sector, are intensively researched, analysed and assessed in detail. Commerzbank Aktiengesellschaft has also worked intensively on implementing the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), which entered into force on 1 January 2023 (see “Managing compliance risks”).

Commerzbank Aktiengesellschaft’s Reputational Risk Management department thus defines the criteria for and limits of business operations and assesses transactions, products and customer relationships after careful analysis. The assessment process starts in the front office: as soon as an issue defined as sensitive by the Bank is affected, Reputational Risk Management must be brought in. The assessment uses a five-point scale and can result in a rejection of the product, the transaction or the business relationship.

According to the risk inventory, reputational risk is one of the main non-quantifiable risk types in the Commerzbank Group and is therefore managed as part of the overall risk strategy. All sensitive issues, positions and directives are reviewed regularly and updated as necessary.

mBank in Poland operates its own Reputational Risk Management function based on its commitment to the United

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Nations Global Compact. mBank's risk management strategy is based on three pillars: supporting sustainable growth, striving for prudent and stable risk management, and strengthening its skills in managing ESG and cyber risks. mBank has formulated its own exclusion criteria for various sectors based on the EU's climate and energy policies. These include the mining and energy sectors, among others: for example, financing for the construction or expansion of hard coal and lignite mines is excluded. mBank's reputational risk strategy is reviewed annually and coordinated with the parent company.

### Recognising impacts on biodiversity

Global economic performance hinges on functioning ecosystem services. A look at the current state of ecosystems



and species inventories makes it clear that the time for action is now. To help us monitor and manage our impact on biological diversity going forward, in 2023 we carried out a second impact analysis. This analysis, performed using the "ENCORE" tool, was updated and expanded compared to the previous year. ENCORE provides a science-based link between economic activities and biodiversity-damaging impacts. In our analysis, we compared the business volume of the sectors we finance with the tool's external data.

**Our deforestation target sets concrete requirements for our customers in sectors and regions where this is a relevant issue to measure their commitment to combating deforestation**

As a major financier of the German economy, we are also active in sectors that have an adverse impact on biological diversity. Compared to the overall portfolio, however, we have little exposure to some of the hardest-hit sectors (agriculture or the textile industry, for example). Sectors with elevated impacts on biodiversity that have a sufficiently large exposure include the energy and automotive sectors. Water consumption, soil and water pollution, and waste have been identified as key drivers of biodiversity impacts across our portfolio.

### Significant sectors with an increased negative impact on biodiversity

NACE code	Sector	Portfolio share
35	Energy supply	4.9%
46	Wholesale (excluding motor vehicle trade)	3.5%
29	Manufacture of motor vehicles and motor vehicle parts	2.6%
28	Mechanical engineering	2.4%
20	Manufacture of chemical products	1.5%

The impact analysis enabled us to identify potential fields of action and strategic priorities and we plan to develop further analyses, measures and products to protect biodiversity. The main challenges in determining biodiversity-related impacts are the availability of relevant data and a lack of standardised metrics and targets. We are therefore striving to make further improvements to the data basis (for example, in relation to location-specific data) and consequently to the results of the impact analysis.

As the topic becomes more and more relevant to society, regulatory requirements are also increasing. These include the Kunming-Montreal Global Biodiversity Framework and the new edition of the National Biodiversity Strategy (NBS 2030). For this reason, we expect an active transformation of the economy in the medium to long term, bringing with it a reduction in the negative impact on things provided by the ecosystem. Biodiversity aspects are already incorporated in our ESG financing offering through their definition as sustainable uses in our ESG framework.

To underpin the methodological and conceptual progress required in defining biodiversity targets, we actively participated in the Nature Target Setting Working Group of the UNEP FI Principles for Responsible Banking, which published its results in November 2023. We were able to take these results into immediate account we adopted a target on deforestation in December 2023 – a topic that plays a key role in preserving biodiversity. With this target in mind, we set concrete requirements for our customers in sectors and regions where this is a relevant issue to measure their commitment to combating deforestation (see section "Evaluating environmental and social risks").

In this non-financial report, we are guided by the requirements of the Taskforce on Nature-related Financial Disclosures (TNFD) for the first time. For future reports, we expect more comprehensive and detailed compliance with the requirements of the TNFD thanks to an improved data basis and methodological advances.

## Reducing financed emissions

We are pursuing the strategic goal of reducing the CO<sub>2</sub> emissions of our entire loan and investment portfolio (referred to as “finance emissions”) to net zero by 2050. To get us to this target, we have identified CO<sub>2</sub>-intensive sectors in our portfolio and set concrete sector-specific reduction targets for these based on the SBTi methodology. The sectors currently classified as especially emissions-intensive are power generation, aviation, automotive manufacturing, commercial real estate financing, and the production of cement, iron and steel. We will likewise consider the retail mortgage financing portfolio, which is deemed optional in the SBTi analysis. This means that we take into account the most CO<sub>2</sub>-intensive elements of the supply chain, so it can be assumed that if these sectors are transformed, other parts of the portfolio will be transformed as well. Corresponding 2030 targets for reducing emission intensities were initially formulated for the specified portfolios and validated by the SBTi. This makes Commerzbank the first German bank with validated SBTi targets. Depending on SBTi methodology availability, we also aim to set portfolio-specific long-term goals (until 2050) in the next few years.



**On the way to achieving a net zero portfolio,  
we have identified and analysed  
carbon-intensive industries**

As announced in September 2023, Commerzbank has joined the Partnership for Carbon Accounting Financials (PCAF). 2023 also saw us switch our method of calculating portfolio intensities to the internationally recognised PCAF standard. In the course of

applying this standard, we additionally recalculated the starting point in the kick-off year 2021 and determined new target values for 2030 (see chart for reduction targets based on the Sectoral Decarbonization Approach). The targets remained as ambitious as before, or became slightly more ambitious, because another sector (cement) moved from a 1.8°C pathway to a 1.5°C pathway. We still await final confirmation of the adjusted targets from the SBTi.

Additionally, we have developed something we call the SBTi Net Zero Dashboard, which serves as a controlling instrument for the SBTi-relevant sectors. Our aim is to support companies in the real economy in their transformation process. We want to achieve sustainable reductions in financed emissions and steer our entire loan and investment portfolio towards our net zero target by 2050 at the latest.

As part of the SBTi framework, we apply two methods for our net zero target: first, the Sectoral Decarbonization Approach (SDA), a method for setting sector-specific intensity targets; and second, the temperature score, which financial institutions use to calculate the current “temperature score” of their portfolio based on their borrowers’ public emission reduction targets.

The table below sets out the sector-specific CO<sub>2</sub> reduction pathways that we have defined for the period to 2030. The percentage reductions derive from the applicable emission intensity for the baseline year 2021 and the targets for 2030. The emission intensities are calculated on the basis of transactions relevant to the balance sheet in both Commerzbank’s loan portfolio and its investment portfolio (Bank’s own banking book). The portfolio targets are published in our ESG framework where they, along with the status of target achievement, are updated on a regular basis. It is planned to publish the current reduction pathways for the temperature score portfolio together with the disclosure report.

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## Reduction targets under the Sectoral Decarbonisation Approach (SDA)

Asset class <sup>1</sup>	Sectors	CO <sub>2</sub> reduction pathways for the period to 2030 <sup>2</sup>			Utilisation (YE2023)	Financed emissions (YE2023)
Consumer loans	Retail mortgage financing	57%	(1.5°)	2021: 45.8 kg CO <sub>2</sub> e /m <sup>2</sup> 2023: 44.4 kg CO <sub>2</sub> e /m <sup>2</sup> 2030: 19.8 kg CO <sub>2</sub> e /m <sup>2</sup>	€96.6bn	
Project financing/ corporate loans and investments	Energy	74%	(1.5°)	2021: 97.3g CO <sub>2</sub> e /kWh 2023: 64.9g CO <sub>2</sub> e /kWh 2030: 25.6g CO <sub>2</sub> e /kWh	€8.5bn	
Corporate loans	Commercial real estate, commercial use	67%	(1.5°)	2021: 87.4 kg CO <sub>2</sub> e /m <sup>2</sup> 2023: 89.0 kg CO <sub>2</sub> e /m <sup>2</sup> 2030: 28.4 kg CO <sub>2</sub> e /m <sup>2</sup>	€8.5bn	4.49 Mt CO <sub>2</sub> e
	Commercial real estate, residential use	57%	(1.5°)	2021: 36.6 kg CO <sub>2</sub> e /m <sup>2</sup> 2023: 36.9 kg CO <sub>2</sub> e /m <sup>2</sup> 2030: 15.8 kg CO <sub>2</sub> e /m <sup>2</sup>		
	Iron and steel	36%	(1.8°)	2021: 1.4 t CO <sub>2</sub> e /t steel 2023: 1.2 t CO <sub>2</sub> e /t steel 2030: 0.9 t CO <sub>2</sub> e /t steel	€0.2bn	
Corporate loans and investments	Cement	23%	(1.5°)	2021: 0.7 t CO <sub>2</sub> e /t cement 2023: 0.8 t CO <sub>2</sub> e /t cement 2030: 0.5 t CO <sub>2</sub> e /t cement	€0.1bn	
	Automotive manufacturing	31%	(1.8°)	2021: 172g CO <sub>2</sub> e /pkm 2023: 148g CO <sub>2</sub> e /pkm 2030: 118g CO <sub>2</sub> e /pkm	€0.3bn	
	Aviation <sup>3</sup>	22%	(1.8°)	2021: 796g CO <sub>2</sub> e /tkm 2023: 785g CO <sub>2</sub> e /tkm 2030: 620g CO <sub>2</sub> e /tkm	€1.2bn	

<sup>1</sup> Customers in the SDA sectors for which no emissions data is available are included in the temperature score. In doing so, we comply with the minimum coverage requirements of the SBTi.

<sup>2</sup> The specified CO<sub>2</sub> reduction pathways represent the actual status at the end of each year, with 2021 considered the base year and 2030 the target year.

<sup>3</sup> The SDA target for aviation generally does not yet form part of the SBTi validation. This is because the SBTi's aviation SDA methodology is currently still designed for the real economy and has not yet been approved for financial institutions.

Achieving the SBTi reduction pathways presents a necessary challenge and a vital opportunity at the same time – something that Commerzbank would like to tackle together with its customers. In order to reduce sector-specific emission intensities, the customers in Commerzbank's portfolio will need to make major transformation efforts themselves. Ultimately, however, the green transformation is a joint task for the entire real economy, financial system, politics and society.

The SDA-relevant loan and investment portfolio consists of customers whose main activities can be attributed to the most CO<sub>2</sub>-intensive industrial sectors. The main drivers of sector-specific emission intensities are the portfolio composition resulting from customers' drawdown patterns (utilisations), and the CO<sub>2</sub> emission intensities of the respective customers themselves. Since the variables mentioned are subject to certain fluctuations over time, the sector intensities shown also exhibit volatility in the same way.

In the area of energy generation, the Commerzbank portfolio at the end of 2023 is performing much better than the target pathway. Of particular note here is the Bank's strategic focus on

project financing in the area of renewable energies. Commerzbank plans to expand this position further over the next few years. The emission intensity trend in the customer portfolio is also largely satisfactory in the automotive manufacturing, iron and steel sectors.

Developments are challenging, especially in the cement sector as well as in the private and commercial real estate finance sector. The trend in the cement sector is primarily due to changes in the total lending of individual large corporate clients with a high CO<sub>2</sub> intensity in 2022, when no established SBTi management was in place, which could not be compensated for in 2023. In real estate financing – in contrast to other sectors – the extent to which a transformation can be implemented in the (very long-term) existing business is limited for legal reasons. It is to be expected that existing business will also improve thanks to increasing modernisation and the use of sustainable energy sources. However, the time horizon involved is very long-term and the process cannot be actively controlled by the Bank. The lever for transforming these portfolios lies much more in new business. The nationwide collapse in the real estate finance business (due in part

to the extensive construction freezes on the back of market uncertainties and price increases) therefore had a negative impact on achieving targets in this sub-portfolio. Future developments here will be heavily dependent on a possible upswing in the new construction business as well as on the political and legal framework conditions supporting the transformation.

We take the SBTi targets into account in our portfolio management. For the management of significant individual transactions in CO<sub>2</sub>-intensive sectors, we have therefore established a process for evaluating relevant exposures in relation to our strategic sustainability targets, including the net zero (SBTi) sector target pathways. The tools for SBTi portfolio management will be progressively expanded. In the 2023 reporting year, we defined general guidelines in a concept for managing and ensuring the achievement of SBTi targets for the Corporate Clients, Private and Small-Business Customers and Treasury business segments, which we will operationalise further in 2024.

## Incorporating EU taxonomy

With the European Green Deal, which envisages greenhouse gas neutrality by 2050, the EU has set itself ambitious sustainability goals. The financial system can make a crucial contribution to transforming the economy by directing capital flows towards sustainable investments. As a uniform classification system, the EU Taxonomy Regulation is intended to support financial market participants in recognising sustainable economic activities by applying comparable criteria. It thus provides key guidance for the development of new green products and services and helps us assess the sustainability of businesses, partners and customers. As described in this report, the “klimaVest” impact fund and the Commerz Real Renewable Energies Fund II of Commerz Real, which is geared to professional and semi-professional investors, are for example, in line with the criteria of the EU Taxonomy. In addition, our sustainable transformation based on the EU Taxonomy criteria can increasingly be supported by differentiated pricing going forward.

The activities included in the EU Taxonomy Regulation may be particularly relevant in terms of their impact on the climate and environment – both positive and negative.

For the 2023 reporting year, transactions subject to the requirements of the EU Taxonomy need to be screened for alignment for the first time. This allows a statement to be made on whether the respective business can be described as sustainable within the meaning of the EU Taxonomy, i.e. whether it makes a positive contribution to one of the defined environmental objectives, does no significant harm to any of the other objectives, and complies with the minimum social safeguards.

The scope of the report has been expanded compared to the previous two years, which significantly enhances transparency regarding the sustainability of business partners and their activities.

Transactions that finance or invest in economic activities within the meaning of the EU Taxonomy, referred to as Taxonomy-eligible transactions, must generally be screened for Taxonomy alignment.

An economic activity is considered a “Taxonomy-eligible economic activity” if it is included in the delegated acts enacted according to Art. 10 (3), Art. 11 (3), Art. 12 (2), Art. 13 (2), Art. 14 (2) and Art. 15 (2) of the Taxonomy Regulation. This applies regardless of whether this economic activity meets all the technical screening criteria set out in these delegated acts (cf. Art. 1 No. 5 of Delegated Regulation (EU) 2021/2178 to Art. 8 of the Taxonomy Regulation (EU) 2020/852).

An economic activity is considered a “Taxonomy-aligned economic activity” if it meets the requirements set out in Art. 3 of the Taxonomy Regulation (cf. Art. 1 No. 2 of the Delegated Act to Art. 8 of the Taxonomy Regulation). This also includes compliance with the “technical screening criteria” set out in Art. 3 d).

### **The EU Taxonomy supports financial market participants in recognising sustainable economic activities by applying comparable criteria**

For banks, the scope of reporting is specified in Delegated Regulation (EU) 2021/2178, which describes in particular the reporting tables and calculation methods for the individual key performance indicators (KPI) (Annexes V and VI). Where this does not provide clear specifications regarding the calculation method, we have made reasonable assumptions.

Concerning the non-legally binding Draft Commission Notice<sup>3</sup> for the EU Taxonomy published at the end of December 2023, we performed a gap analysis from our previous interpretation based on the information available up to that point. In our opinion, the document contains various clarifications as well as new, expanded requirements. We have not taken the content into full account in the current reporting. For example, we currently do not pass on Taxonomy Quotas from parent companies required to publish a non-financial report (NFR) to subsidiaries. It has not yet been possible to determine a final implementation procedure due to the late publication date. We will evaluate this further in 2024.

<sup>3</sup> Title of EU publication: Draft Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (third Commission Notice).

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The most important KPI for credit institutions is the green asset ratio (GAR), which specifies the ratio of relevant Taxonomy-aligned assets to a bank's total covered assets. The GAR relates to the material items within our assets, specifically the lending and investment business, including loans, bonds and equity instruments.

In addition to the GAR, we are publishing the following performance indicators in this report for the first time (see the Notes, starting on page 93 ff.):

- GAR (flow): indicates the inflow of new Taxonomy-aligned assets relative to the total covered assets. The inflow is clearly identified by the start date of a transaction, which is defined depending on the transaction type. For loans, the flow is the gross carrying amount of the new business active on the current reporting date and received in the reporting period. For securities, the flow corresponds to all securities received in the reporting period, regardless of whether the position still exists as at the current reporting date.
- Financial Guarantees (FinGuar KPI): indicates the ratio of Taxonomy-aligned financial guarantees in relation to the total covered financial guarantees.
- Assets under Management (AuM KPI): indicates the ratio of Taxonomy-aligned assets under management in relation to the total covered assets under management.

The KPIs are determined twice because the disclosures by the companies (counterparties) are included in the calculations, and both turnover-based and CapEx-based KPIs are available.

We have not yet provided the flow size for AuM and financial guarantees (AuM KPI, FinGuar KPI) for the current reporting year because of unclear information regarding the calculation methodology. According to our interpretation, this cannot be determined until the next reporting date.

Information on prior-year comparisons can generally only be provided on the next reporting date. As a result, the corresponding sections of the table are not filled in the Notes. They will be added in the next report.

The EU taxonomy only covers certain parts of our business. Some transactions are completely excluded, for example the trading portfolio (until the 2026 financial year) and transactions with governments<sup>4</sup> or central banks. In addition, the GAR denominator includes portfolios that cannot be reported as Taxonomy-aligned, for example loans to SMEs.

The populations of numerator and denominator therefore differ significantly from one another.

**The green asset ratio (GAR) specifies  
the ratio of relevant Taxonomy-aligned assets  
to a bank's total covered assets**

The transactions that are relevant for the numerator are generally transactions with companies that are required to submit a non-financial report (NFR) in accordance with the Non-Financial Reporting Directive. In order to identify these companies, we used data from an external data provider on companies required to publish a non-financial report, which we combined with our customer information. Certain transactions with households and local authorities are also taken into account. In the case of special financing for special purpose vehicles (SPV's) that are not regularly required to submit a non-financial report, we applied a 'look through' approach. Here, we consider the use of proceeds to be most important and are including this accordingly in the reporting.

Two procedures are used to screen our risk positions for Taxonomy eligibility or Taxonomy alignment. A distinction is made based on whether the use of the proceeds by the borrower/issuer is unknown (general-purpose loans and securities) or known (loans with a purpose).

General-purpose loans and securities are weighted using the turnover-based and CapEx-based KPIs of the borrower/issuer and are thus included in the calculation of the GAR in the two calculation variants.

The calculation of the GAR and AuM KPIs includes equities with the issuer's turnover-based or CapEx-based KPIs as well as certain funds (according to Art. 8 and Art. 9 of the Sustainable Finance Disclosure Regulation (SFDR)) with the product-specific KPI. We do not carry out a 'look through' for other funds. For bonds where the issue proceeds were allocated to a specific sustainable purpose, the issuers have not yet provided product-specific KPIs whose calculation methodology meets the Taxonomy requirements. Until the newly enacted EU Green Bond Standard is applicable and product-specific taxonomy quotas are available, all bonds will be assessed using the issuer's turnover-based and CapEx-based KPIs.

We assess general purpose loans and securities on the basis of external data relating to our counterparties' KPIs. The information provided by the data providers refers to the companies' disclosures for the 2022 reporting year. If no information was available, we assessed these positions as Taxonomy-non-eligible or Taxonomy-non-aligned.

<sup>4</sup> We also include transactions with regional governments.



Risk positions towards relevant subsidiaries of companies required to publish a non-financial report are generally assessed based on the subsidiary's disclosed KPIs. If no KPIs are available at subsidiary level, we assess these risk positions as Taxonomy-non-eligible or Taxonomy-non-aligned.

When screening loans where the use of proceeds is known, the assessment is based on the information provided by the borrower about the activities for which the proceeds are used. If the use of funds (financed economic activity) is described in the Taxonomy Regulation, we assess these loans as Taxonomy-eligible.

In order to determine whether a transaction can be classified as Taxonomy-aligned, we examine the comprehensive technical screening criteria, which differ depending on the economic activity. A check is also carried out to determine that none of the other objectives are significantly harmed and that the criteria for social minimum safeguards are met.

We have established appropriate procedures to assess Taxonomy eligibility and Taxonomy alignment. We rolled out

software solutions in 2023 that allow us to implement (partially) automated processes when screening for Taxonomy alignment, making the process more streamlined and efficient.

We generally assess Taxonomy alignment for Taxonomy-eligible transactions that are essential to our business activities and, where necessary, introduce new processes to collect relevant information about our customers.

In cases where we did not have access to the required information and evidence (for checking the technical screening criteria) and this could not be ascertained with reasonable effort, we classified these items as Taxonomy-non-aligned.

The KPIs were calculated using the Bank's central data warehouse, which also forms the basis for the financial reporting. The mBank data were collected locally and then integrated into the Group figures. The calculation was based on gross carrying amounts.

The green asset ratio in the reporting period is as follows:

## 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

In %	Total environmentally sustainable assets <sup>1)</sup>	KPI <sup>2)</sup> (turnover)	KPI <sup>2)</sup> (CapEx)	% coverage (over total assets) <sup>3)</sup>	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1)) and Section 1.2.4 of Annex V)
<b>Green asset ratio (GAR) stock</b>	<b>2.28</b>	<b>2.34</b>	<b>2.43</b>	<b>32.98</b>	<b>36.25</b>	<b>30.77</b>
<b>Additional KPIs</b>	<b>GAR (flows)</b>	<b>0.72</b>	<b>0.76</b>	<b>0.79</b>	<b>6.70</b>	<b>9.75</b>
	Trading book <sup>4)</sup>				X	X
	Financial guarantees	0.00	0.04	0.10	X	X
	Assets under management	0.00	6.04	6.86	X	X
	Fees and commissions income <sup>5)</sup>				X	X

<sup>1)</sup> Based on own assumption: Percentage of assets for which the use of proceeds by the borrower / issuer is known (over total GAR assets).

<sup>2)</sup> Based on the Turnover KPI and CapEx KPI of the counterparty.

<sup>3)</sup> Percentage of assets covered by the KPI over banks' total assets.

<sup>4)</sup> For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR.

<sup>5)</sup> Fees and commissions income from services other than lending and AuM. Institutions shall disclose forward-looking information for these KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

Our Taxonomy-aligned volume and thus the green asset ratio is characterised by retail mortgage financing and special financing for SPV's in the field of renewable energies in the European Economic Area.

The current reporting of Taxonomy-aligned volume relates to environmental objectives 1 and 2. Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplements the EU Taxonomy with technical screening criteria for four additional environmental objectives.

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With respect to the four additional environmental objectives, financial firms will initially only have to provide information regarding Taxonomy eligibility from the 2023 reporting year onwards. The full reporting requirements for Taxonomy alignment will apply starting from the 2025 reporting year.

Taxonomy-eligible activities must be assigned to one – specifically– the most relevant – environmental objective. Double counting is not permitted. The Taxonomy eligibility of loans where the use of proceeds is known was screened for all six environmental objectives. The loans were consequently assigned to the first environmental objective (climate change mitigation). There was no remaining amount that could be allocated to other environmental objectives. For general-purpose loans and securities, we only had company KPIs for the first environmental objective – climate change mitigation – and, to a limited extent, also for the second environmental objective – climate change adaptation.

Accordingly, the columns in the templates for data on environmental objectives three to six are empty and have been hidden by us in this report.

The extension of the EU taxonomy to include nuclear and gas entered into force on 1 January 2023, so the corresponding company data will be included in this report for the first time (for general-purpose loans and securities). The financed economic activities in the nuclear and gas sector are part of the green asset ratio (stock). In addition, we are required to report the shares in the GAR (stock) in separate templates in the Notes. We have not identified any loans where the use of proceeds is known in the nuclear and gas sector.

Commerzbank's own understanding of sustainability in these activities is described in greater detail in the ESG framework. We have a principle of not financing any new nuclear power plants. The same is true for uranium mines. We have strict requirements for transactions involving fossil fuels and generally take a critical view of these transactions. At the same time, we see the need for gas as a transition technology over the coming years to ensure continued stability of supply. We therefore critically scrutinise financing for the construction of gas-fired power plants on a case-by-case basis.

## Managing environmental risks

Commerzbank defines environmental

risks as both climate-related and biodiversity risks.



### Comprehensive assessment of climate-related risks

At Commerzbank, we do not consider climate-related risks as a separate type of risk, but as a horizontal risk. This can materialise across the different known types of risk such as credit risk or

market risk. In 2023, we carried out another comprehensive materiality analysis for environmental risks across all risk types for the Commerzbank Group as part of the annual risk inventory process, taking into account the requirements of the European Central Bank's "Guide on climate-related and environmental risks". In this process, all risk types assessed as material in the risk inventory were evaluated in terms of factors such as their materiality in relation to climate-related risks. Both transition and physical risks were considered and a materiality assessment was carried out in each case. This classification into materially affected and non-materially-affected risk types is based on both a time dimension and a risk type-specific dimension.

### An integral part of risk governance is the materiality analysis for climate-related risks

The time dimension is divided into short, medium and long-term time horizons. For each specified time horizon, an assessment is first carried out for climate-related and biodiversity risks, which can then be further divided into physical and transition risks. The materiality threshold on which this classification is based is consistent with the established risk thresholds from the risk inventory for all risk types. Materiality for each risk type is determined on a scenario basis and, where possible and appropriate, also on a quantitative basis. This provides the foundation for ensuring holistic consideration of the effects resulting from the risk types materially affected by environmental risks as part of Commerzbank's ICAAP. A comprehensive qualitative analysis of possible transmission channels is carried out, and in general scenario-based quantification is added. The climate scenarios used include those formulated by the Network for Greening the Financial System (NGFS). The internally established scenario analysis and stress testing infrastructure are used for this purpose.

Transition risks arise for companies as a result of the transition to a lower-emission and more sustainable economic system (e.g. owing to regulatory or legal changes in energy policy, changes in market sentiment and preferences, technological innovations or greenwashing risks). Physical risks, by contrast, arise as a result of changing climatic conditions and the associated more extreme and more frequent acute weather events, such as floods or heatwaves, or chronic effects, such as rising sea levels.

As a result of the analysis, the influence of climate-related risks for the risk types credit risk, market risk, operational risk (including compliance and cyber risk), reputational risk and business risk was confirmed as material. No materiality was established for property value risks, liquidity risks and model risks. A risk type is considered to be materially influenced by climate-related risks as soon as it is materially affected by either transition

climate-related risks or physical climate-related risks in one of the three specified time horizons.

### Climate-related risk materiality assessment<sup>1</sup>

Material risk types	Climate-related risk materiality assessment					
	Physical risks			Transition risks		
	Short term	Medium term	Long term	Short term	Medium term	Long term
1 Credit risk (including counterparty risk)	No	No	Yes	No	No	Yes
2 Market risk	No	No	No	No	No	Yes
3 Operational risk (including compliance and cyber risk)	No	No	No	Yes	Yes	Yes
4 Reputational risk	No	No	No	Yes	Yes	Yes
5 Property value risk	No	No	No	No	No	No
6 Business risk	No	No	No	Yes	Yes	Yes
7 Liquidity risk	No	No	No	No	No	No
8 Model risk	No	No	No	No	No	No

<sup>1</sup> The short-term time horizon is up to one year, the medium-term time horizon two to five years, and the long-term time horizon more than five years (at least ten years were considered).

The findings of the materiality analysis feed into business strategy, the overall risk strategy and the sub-risk strategies as well as into other core elements of the Bank's internal process to ensure an adequate capital position, such as the internal stress test framework and the risk-bearing capacity concept. Particularly in the case of risk types materially affected by climate-related risks, environmental risks are managed within the risk function responsible for the respective risk type. The materiality analysis for climate-related risks is an integral part of the Commerzbank Group's risk governance. In addition to the annual materiality analysis, we carry out internal climate stress tests too.

As a financial institution of the German economy, we are also active in sectors that are particularly exposed to climate-related physical or transition risks. However, we have little exposure to some of the hardest-hit sectors (agriculture, for example). Sectors that could potentially be more heavily affected by climate-related risks and that have larger exposures are, for example, the energy sector, the automotive sector and mechanical engineering, as well as (commercial) real estate finance.

Owing to the geographical focus of our portfolio in Germany and Europe, we are comparatively less affected by physical climate-related risks, such as hurricanes and rising sea levels. The materiality analysis shows that both transition and physical climate-related risks are material to credit risk over a long-term time horizon.

Reputational risk is one of the Commerzbank Group's main non-quantifiable risk types (see "Evaluating environmental and social risks"). Reputational risks were classified within the materiality analysis as material overall, particularly due to greenwashing risks. Quantitative effects were evaluated using bank-specific and risk-type-specific scenarios, including expert estimates. Reputational risk is now considered within the context of environmental risk as part of regular central risk reporting. Additional appropriate control measures have been implemented, such as a greenwashing risk internal control framework and the screening of new sustainable products to identify greenwashing.

Detailed reporting on the risk types is published online in the ESG appendix of the disclosure report.

### Taking climate-related risks into account in lending

In order to manage the effects of climate-related risks in Commerzbank Aktiengesellschaft's lending business, we are systematically optimising our processes and methods. We must understand and actively manage the associated risks, not least in connection with our strategy, in order to support the transformation of companies to a more environmentally friendly and climate-neutral economy. We combine specific findings from scenario analyses (including sector- or country-specific effects of climate-related risks) with an individual risk analysis at customer level.

**We are continually updating our processes and methods to manage the effects of climate-related risks in the lending business**

The findings from the scenario and credit risk analyses are aggregated in a structured assessment ("score"). We factor this score into the individual loan decision. Depending on the score, increased requirements or restrictions are triggered on a portfolio-specific basis. We also use the score as part of our portfolio analysis and management. Portfolio-specific guidelines, which are anchored in the credit risk strategy, limit the share of loans with heightened climate-related risk. These processes and procedures are mandatory components and incorporated in full into the credit risk analysis.

We take a portfolio-specific approach and thus take appropriate account of the differences in terms of those affected and the risk drivers.

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In the particularly relevant portfolios such as corporate clients, special financing, banks and commercial real estate finance, we have supplemented the qualitative risk analysis in the individual loan decisions with these specific aspects for the analysis of climate-related risks. We will progressively extend this approach to other portfolios and include smaller companies, for example. In our target state, we want to integrate climate-related risks – as far as possible – into the quantitative credit risk analysis and thus fully reflect them across the process, including in pricing and reporting.

Another key aspect is adding continuously to our specialists' expertise in climate-related risk, which enables us to discuss the challenges and work together with our customers to assess the risks on an equal footing. We deepen this know-how with the support of external consultants, academia and various initiatives.

Climate-related risks – both physical and transition risks – also play a major role in Commerz Real's asset management. The Bank uses future scenarios based on the representative CO<sub>2</sub> concentration pathways set out by the Intergovernmental Panel on Climate Change to accurately determine the exposure of assets and the portfolio. In its risk assessment, including scenario analyses, Commerz Real relies on tools such as the Carbon Risk Real Estate Monitor (CRREM) and the Climate Excellence Tool. The CRREM tool shows climate pathways using asset class and country-specific CO<sub>2</sub> and final energy target values for a 1.5° and a 2.0° scenario. The Climate Excellence Tool, on the other hand, allows for a site-specific evaluation of physical climate-related risks for different scenarios.

In this way, Commerz Real tries to perform a risk analysis that is as accurate as possible for the location on the basis of existing data and to derive specific measures to prevent damage at an early stage. The results feed into the risk assessment and the sustainability assessment of all real estate transactions and are taken into account accordingly in the management phase. The basis of climate risk management is collecting all consumption and emissions data and location data in a way that is as reliable as possible. To this end, Commerz Real has implemented a sustainability data management system and also uses external partners to collect data on a global level.

### Understanding biodiversity risks

Commerzbank considers both climate-related risks and biodiversity risks. These are also regarded as horizontal risks for the Bank. As with climate-related risks, the classification of biodiversity risk for material risk types is a central component of the annual materiality analysis. Following the initial 2022 report, the scope of the analyses and methodology were expanded and improved in the year under review. The expert-based assessment of biodiversity risks and their impact within the Bank includes a driver and transmission channel analysis, which in the year under review was also supported by the first qualitative consideration of biodiversity-related scenario narratives. The two narratives

considered each had a physical and/or transition risk focus. Physical biodiversity risks arise from a loss or degradation of things provided by the ecosystem which are vital to the economic system (e.g. availability of water, pollination or genetic diversity). Transition risks, on the other hand, describe risks that arise as a result of the transformation process towards a more sustainable and environmentally friendly economy. Such risks could arise if the water price increases significantly for a company with high water consumption (for example, due to regulatory requirements).

To summarise, credit risk, reputational risk and business risk are materially affected by biodiversity risks. The focus here is primarily on medium- and long-term transition risks.

### Biodiversity risk materiality assessment<sup>1</sup>

Material risk types	Biodiversity risk materiality assessment					
	Physical risks			Transition risks		
	Short term	Medium term	Long term	Short term	Medium term	Long term
1 Credit risk (including counterparty risk)	No	No	Yes	No	No	Yes
2 Market risk	No	No	No	No	No	No
3 Operational risk (including compliance and cyber risk)	No	No	No	No	No	No
4 Reputational risk	No	No	No	No	Yes	Yes
5 Property value risk	No	No	No	No	No	No
6 Business risk	No	No	No	No	Yes	Yes
7 Liquidity risk	No	No	No	No	No	No
8 Model risk	No	No	No	No	No	No

<sup>1</sup> The short-term time horizon is up to one year, the medium-term time horizon two to five years, and the long-term time horizon more than five years (at least ten years were considered).

### Analysis of biodiversity risk in credit risk

The physical risk analysis for credit risk focuses on assessing the extent to which sectors in which Commerzbank is represented through credit exposures are dependent on the things provided by the ecosystem. The risk assessment additionally incorporated external data from ENCORE, which classifies each sector's degree of dependency. The data concerning dependence of an economic activity on the things provided by the ecosystem was considered together with the business volume in the respective sector. The materiality analysis revealed that some sectors are more dependent on things provided by the ecosystem, such as wholesale and the chemicals and food sectors. Overall, around 10% of the portfolio has a high dependency and around 29% has a medium dependency on things provided by the ecosystem. The biggest driver of physical biodiversity risks is dependence on water. A more in-depth analysis based on the approach to climate-related risks is planned for the future, supported by appropriate scenarios – where available – and more advanced assessment methods.

In the case of transition biodiversity risks for credit risk, the assessment included the adverse impact of business activities on the environment and the potential consequences resulting from anticipated future regulatory changes to protect biodiversity. According to the assessment, high transition risk exists if both the adverse impact and the foreseeable regulatory changes are classified as likely. Commerzbank identified the chemicals and beverages sector as well as the extraction of crude oil and natural gas as high transition risk sectors for the Bank. Overall, 4% of the portfolio was rated as having a high transition risk, and 24% a medium transition risk.

With respect to credit risk, physical biodiversity risks are more relevant than transition risks as few concrete transformation processes are discernible at the present time.

Biodiversity risks also play an important role at Commerz Real. This applies especially to our fund products, which meet the transparency obligations under Article 8 or Article 9 of the EU Disclosure Regulation and aim for or intend to ensure a minimum proportion of Taxonomy-aligned investments. For example, in the case of “klimaVest” and the Commerz Real Renewable Energies Fund II, which was issued for professional and semi-professional investors, impact and ESG due diligence is carried out as part of the purchasing process for every potential investment. Any adverse impacts on biodiversity are examined and evaluated alongside the other environmental targets of the EU Taxonomy. The funds strive to ensure that their investments do not go to wind or solar plants built in protected areas and that these plants do not have a significant adverse impact on local biodiversity.

## 4. Supporting the customer transformation

Combating climate change and the loss of biodiversity requires not only favourable political conditions and new technical solutions, but above all adequate financial resources. This poses numerous opportunities for us as a bank. The energy revolution and reduction in CO<sub>2</sub> emissions are creating a need for new technologies and products requiring large investments. At the same time, our customers are facing new types of non-financial challenges: from collecting data and managing their own carbon footprints to making decisions on their technological direction in the context of the energy transition. In addition, interest in sustainable investment opportunities is growing, which is why we are developing products and services that take account of these changes while offering an environmental or social benefit.

We provide our customers with expert advice on transforming their business models. We align our offering with their interests, evaluate our business success in part based on their satisfaction, and incorporate sustainability into our dialogue formats. Ensuring data security also makes a significant contribution to customer satisfaction. We continuously check this level of satisfaction and ensure that we involve our customers at the appropriate points.

### Sustainable financing

We develop sustainable products with market analyses, the Bank's own technical and product expertise and regulatory requirements in mind. These products support our customers in their sustainable transformation and at the same time provide incentives for companies and private individuals to become more sustainable. We draw on classic product development practices, agile methods and direct dialogue with customers. The products prioritised for development are determined in equal measure by the requirements of the Bank's own sustainability strategy, customer needs, economic considerations and regulatory requirements.

When integrating ESG aspects into our products, services and consulting processes, in the future we will focus not only on the climate, but also on other topic areas identified in the materiality analysis, such as environmental protection and biodiversity. In the Corporate Clients segment, we rely on risk and sales data to evaluate the ESG dimensions of our portfolio. These offer sustainable business opportunities and at the same time allow us to provide advisory services and financing products to support our customers in their own transformations. The sales and lending departments work closely together to address the specifics of ESG issues. mBank also reviews and evaluates new products in terms of their impact on the environment and society (including customers). This encompasses sustainability aspects such as greenhouse gas emissions and climate change, waste and the circular economy, and equal access to financial services.

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## Promoting renewable energy

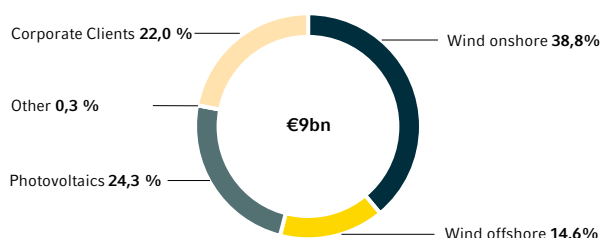
Commerzbank Aktiengesellschaft has long, wide-ranging experience with renewable energy. Corporate and project financing along the value chain have been part of our portfolio since the 1980s and will continue to be a growth area for us in the future. The core business of the Centre of Competence Energy (CoC Energy), which has sites in Hamburg and New York, is the global provision of finance to wind and solar parks as well as related technology. The plants that are financed are operated in particular by independent power producers, project developers, institutional investors and utilities.

**The total financing commitment of the Centre of Competence Energy (CoC Energy) in 2023 was around €9bn**

Commerzbank Aktiengesellschaft is currently one of the largest financiers of renewable energy in Europe and further expanded its international portfolio share in the year under review. 2023 once again saw us realise financing for wind farms and solar parks as well as add new projects and refinancing transactions in Europe and the USA. One of the flagship projects in the year under review was the Boitzenburger Land solar park. We are the sole financing partner for this project, which has a volume of €100m. The solar park supplies around 65,000 households with green electricity every year. CoC Energy's total financing commitment in 2023 was around €9bn.

### Renewable energy portfolio

bn€ | financing commitments as at 31 December 2023)



As part of its 2021–2025 business strategy, mBank has committed to mobilising approximately €2.1bn (10bn Polish zloty) to finance green investments, particularly in renewable energy sources.

At the end of 2023, mBank's total renewable energy portfolio had a value of €909m (3.98bn Polish zloty). In 2023 alone, mBank provided around €261m (1.15bn Polish zloty) for seven photovoltaic projects, two wind farm projects and two hybrid projects comprising photovoltaic and wind farm investments. In addition to financing large-scale projects, mBank offers financial support for smaller renewable energy projects with a rated output of up to 5 megawatts.

Commerz Real contributes directly to shaping the energy revolution by investing in renewable energy. It also sources electricity from renewable sources for the properties held by its funds and special funds, where local markets permit.

## Demonstrating sustainable finance solutions

Commerzbank Aktiengesellschaft offers



corporate customers sustainable bilateral credit products (green loans) used to fund sustainability-related projects. Corporate financing can also take the form of KPI-linked loans and ESG rating-linked loans, where the conditions are based on the extent of the company's transformation efforts. Indicators for this include individually agreed key figures, some of which are externally validated, such as reductions in CO<sub>2</sub> emissions. Another measurement parameter is the sustainability rating, which shows a company's sustainability efforts in comparison to sector performance. The Bank is also working on expanding its financing offering with sustainability components.

We are additionally incorporating sustainability considerations into the development of traditional financing solutions. We advise businesses about the advantages of public promotional loans such as KfW's energy efficiency programmes or its climate protection initiative for small and medium-sized enterprises. We keep an eye on new products and product evolutions from the public funding bodies and offer these to our customers.

In the Private and Small-Business Customers segment, the offering includes financing for energy-efficient buildings. The green mortgage loans scheme, for example, offers preferential financing conditions for the construction, modernisation or acquisition of buildings – for own or third-party use – whose energy value does not exceed 50kWh per square metre of usable floor space.

This applies equally to all multi-dwellings as well as residential and commercial buildings where the share of income from commercial rent is less than one third. The green "KlimaDarlehen", an individual loan for self-employed people and small businesses (formerly "green CBU"), also finances sustainable commercial investments. Examples of these include heat or electricity generation from sustainable, renewable sources and investments in



electric and hydrogen mobility. The intended uses of these projects meet the definition of environmentally sustainable activities under the ESG framework, meaning that the financing goes towards climate protection or climate adaptation activities.

Responsibility in the lending business for the Private Customers segment also takes account of potential changes in a customer's economic situation. This also includes identifying customers with signs of financial problems early on – and thus before the emergence of problems threatening their existence, if possible – and suggesting measures to be taken which will, ideally, lead to an orderly repayment process.

## Sustainable investments and capital market products

In the investment business, too, we want to contribute to sustainable development and take advantage of the associated business opportunities, for example by offering sustainable funds, integrating sustainability matters into asset management and using sustainable capital market instruments. We also take our customers' sustainability preferences into consideration as standard when giving investment advice.

### Developing sustainable bonds and loans

In 2007, we were involved in issuing the world's first green bond. Since then, we have supported a large number of companies in preparing and issuing sustainable bonds. In the 2023 reporting year alone, Commerzbank acted as lead manager for the issue of 76 sustainable bonds with a total volume of €61bn (2022: €46.6bn), an increase of more than 30% year on year. This volume is included in the sustainable business volume in accordance with the criteria set out in the ESG framework.

**Commerzbank acted as lead manager  
for the issue of 76 bonds  
with a total volume of €61bn in 2023**



The transactions supported in 2023 again included a number of issues from companies that for the first time linked their capital market transactions with their sustainability strategy. In addition, Commerzbank supported a growing number of green and social bonds in Swiss francs in 2023 with a volume of more than CHF 1bn. Through our involvement in various interest groups and professional associations, such as the ICMA Green Bond Principles and the Climate Bonds Initiative, we also make a contribution to furthering the development of the market for sustainable bonds. In

total, the Bank has already assisted in the issue of more than 280 sustainable bonds.

In addition, Commerzbank Aktiengesellschaft arranges, structures and places sustainable promissory note loans and syndicated loans, particularly in the form of ESG-linked loans, for corporate customers of varying sizes across a wide range of sectors. In these transactions, we regularly act as sustainability coordinator in order to develop ambitious ESG structures, working on behalf of the banking consortium in close consultation with the companies. ESG-linked loans are a comparatively new but very fast-growing product category, and now represent the most common form of sustainable syndicated loans. The terms of the loans are linked to sustainability criteria, predominantly in the form of sustainability-related KPIs or a borrower ESG rating. If the borrower meets the predefined targets for these KPIs or the underlying rating, the interest rate is lower – with higher interest rates applying if they are not met. Sustainable promissory note loans operate in essentially the same way. Since 2017, we have been participating in working groups of the Loan Market Association to actively shape the implementation of sustainability in the syndicated loan market.

Due to the challenging market environment, Commerzbank only just missed the targets it set for itself for concluding new sustainable loans and promissory note loans with a volume of €75bn in 2023. This also includes 65 sustainable syndicated loans and promissory note loans for companies at the global level with a total transaction volume of €74.7bn (Commerzbank loan commitments of around 6%). Syndicated loans accounted for the major part of the volume.

**In 2023, Commerzbank was involved in 65 sustainable syndicated loans and promissory note loans for companies at the global level with a total transaction volume of €74.7bn**

Sustainability aspects are also playing an increasingly important role in the Bank's own investments. As part of its liquidity management activities, Commerzbank Aktiengesellschaft is increasingly investing in sustainable bonds and building up its own ESG portfolio. To this end, the Bank plans to invest an increasing proportion of its own assets in green, social and sustainability bonds.

By the end of 2023, their volume within the liquidity portfolio had reached around €3.1bn. Commerzbank takes sustainability aspects into account in its company pension scheme in Germany, with asset managers only selected for the pension plan if they have signed the UN Principles for Responsible Investment (PRI).

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## Managing customers' money sustainably

As a signatory to the UN PRI, the Asset



Management unit at Commerzbank Aktiengesellschaft is committed to incorporating sustainability aspects into its analysis and decision-making processes and making an active contribution to responsible investment decisions. Asset Management therefore offers wealthy individuals as well as corporate and small-business customers various solutions that take environmental and social factors into consideration. In particular, customers can agree on individual sustainable asset management in which the security selection not only takes exclusion criteria and sustainability ratings into account, but also aims to invest in companies with sustainable business activities. In 2023, "Vermögensverwaltung Nachhaltigkeit" (Sustainable Asset Management) celebrated its 10th anniversary. The overall picture shows that the integration of ESG criteria does not engender any systematic disadvantages for performance and improves risk management.

Overall, the proportion of sustainable investments, which under the ESG framework feed into the sustainable business volume, has increased significantly in recent years and as at the end of 2023 accounted for 12.5% of Commerzbank Asset Management's AuM.

The digital and sustainable asset management offering "cominvest green" from the Commerzbank brand comdirect gives customers the choice between a wide range of exchange-traded funds (ETFs) that reduce adverse effects in terms of ESG. In addition, the motif investing product allows customers to make targeted investments in megatrends without advice. The funds, ETFs and equities are sorted into themes such as robotics, health, technology and sustainability, which customers can then use to compile their portfolio. These products are also available to select for other investment formats such as savings plans.

With the acquisition of a majority stake in Aquila Capital Investmentgesellschaft at the beginning of 2024, Commerzbank Aktiengesellschaft is expanding its range of offerings for customers in sustainable asset management. The investment company specialises in essential real asset investments such as renewable energies and sustainable infrastructure projects. The transaction is still subject to the necessary regulatory approvals but is expected to be completed during the second quarter of 2024.

mBank is also active in this segment, and private customers can now invest in ETF-based equity and bond portfolios that promote environmental and social aspects. Two of the seven model portfolios offered by mBank currently meet these requirements, with an expansion planned for the future. The value of assets invested in ESG asset management strategies for private customers at end-2023 was virtually unchanged year on year at

€34m (151m Polish zloty). The share of these ESG investment strategies of the total volume in the model portfolios of this customer group was 32%, thus remaining on a comparable level with the previous year.

Commerz Real combines sustainable investment opportunities with a direct contribution to shaping the energy revolution: Numerous investments have followed since the first investments were made in solar energy via funds back in 2005. The portfolio has also been expanded to include onshore and offshore wind turbines. The Commerz Real Group holds stakes in 55 ground-mounted solar parks and 41 onshore/offshore wind farms with an annual total rated output of around 1,573 megawatts, making it one of the largest German asset managers in this segment today. A further 511 megawatts of total rated output can be realised by 2028 through the completion of six previously acquired solar park development projects. The assets under management in renewable energy stood at around €3.3bn at the end of 2023.

In 2020, Commerz Real launched "klimaVest", the first open-ended real asset fund in the renewable energy sector aimed at private investors, with redemption rights in the form of a European Long-Term Investment Fund (ELTIF). Since 2021, the fund has met the transparency requirements to qualify as a sustainable financial product under Article 9 of the EU Disclosure Regulation. "klimaVest" invests mainly in facilities for the generation of renewable energy and in the infrastructure of the energy revolution. The fund's investment objective is to generate risk-adjusted returns for investors while making a positive contribution to the achievement of environmentally sustainable objectives within the meaning of the EU taxonomy and in accordance with the Paris Agreement. "klimaVest"'s volume stood at around €1.3bn as at the end of 2023.

For professional and semi-professional investors, the Commerz Real Renewable Energies Fund II combines the topics of sustainability and returns in the form of an impact fund. In pursuing its investment objective, it strives to help limit global warming in the long term in line with the climate protection goals outlined in the Paris Agreement. By investing in environmentally sustainable renewable energy systems such as wind farms and photovoltaic systems, the fund promotes the energy transformation by ensuring or increasing the proportion of green electricity in the power grid. The fund also complies with the transparency requirements set out in Article 9 of the EU Disclosure Regulation.

In addition, Commerz Real sets great store by sustainability in managing its real estate assets, such as with hausInvest. With €17.3bn in assets at the end of 2023, the fund is one of the largest open-ended real estate funds in Europe. In 2021, it became one of the first open-ended real estate funds to promote environmental and/or social objectives pursuant to Article 8 of the Disclosure Regulation. The fund has expanded its investment strategy accordingly. The aim is to reduce the portfolio's CO<sub>2</sub> footprint to

14 kilogrammes per square meter by 2050. In 2022, hausInvest decided to meet the requirement level for environmentally sustainable investments under the EU taxonomy and the minimum requirements for sustainable investments for the purposes of the EU Disclosure Regulation. The taxonomy states that their minimum share is 5% of the fair value of the real estate belonging to the special fund. In determining the fair value mentioned above, project developments are included from the time of their completion and properties held by real estate companies are included in proportion to their ownership interest.

Since May 2023, the Smart Living Europe Fund has been the first institutional real estate fund from Commerz Real to meet the transparency requirements in accordance with Article 8 of the EU Disclosure Regulation. To this end, a minimum share of 10% (measured by the market value of the real estate held in the portfolio) is maintained in sustainable investments in accordance with Article 3 of the EU Taxonomy.

### Trading or offsetting emissions

Commerzbank Aktiengesellschaft is a participant in the European Emissions Trading Scheme (EU ETS) and the UK Emissions Trading Scheme (UK ETS). It advises companies on the procurement of carbon emissions rights and on the associated risk management aspects, and helps to implement the resulting trading strategies. In addition, there is the option of voluntarily offsetting a company's unavoidable carbon emissions with certificates from emission reduction projects. As a member of the World Bank's Carbon Pricing Leadership Coalition, the Bank also participates in the global debate on carbon pricing. In equipment leasing, Commerz Real has incorporated the topic of sustainability into its business via its subsidiary Commerz Real Mobilienleasing (CRML). CRML's PRO Climate Lease also offers the option, in parallel with the financing business, to support projects aimed at avoiding or absorbing CO<sub>2</sub> emissions via individual CO<sub>2</sub> offsets.

## Ensuring data security

The protection of customer data and compliance with banking secrecy requirements are of the utmost importance in this era of increasing digitalisation. They are fundamental to the satisfaction of our customers and to trust within a long-term business relationship. That is why data security is a key issue for us in terms of responsible banking.

### Responding to cyber crime

With the increasing digital networking of state, business and society, cyber security and cyber resilience are becoming more and more important. Commerzbank scrutinises not only its own information, premises and IT systems, but also those of its customers and service providers, including any independent transport routes. Cyber security is a driver of customer confidence and thus an important competitive factor. With that in mind, it is crucial to ensuring the security of our systems. As part of the critical infrastructure, the financial industry is subject to enhanced legal requirements.

**Data security is a key issue  
for us as part of responsible banking**

We want to adequately address both this trend and future challenges relating to the management of cyber risks. Cyber and information security risks are managed by the Group division Group Risk Management – Cyber Risk & Information Security (GRM-CRIS), which reports to the Group Chief Information Security Officer. In addition to established security functions such as the ISO 27001 certified Information Security Management System, the focus is on managing cyber risk appropriately and on strengthening Commerzbank's cyber resilience. To cover the human element, we also rely on our employees being highly security and risk-conscious. We promote this via a special, multi-award-winning information security awareness campaign. GRM-CRIS also addresses the interplay between cyber and information security risks and other types of risk relating to areas such as HR, procurement, business continuity management (BCM) and physical security.

mBank also attaches great importance to the security of its IT systems and the data they contain, deploying suitable organisational and technical solutions. Every employee of mBank in Poland is required to complete cyber security training once a year. The Bank's security department also includes a 24-hour security operations centre (SOC).

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Employees and customers can report all cyber security matters to the SOC, including identified incidents, attempted attacks and suspicious transactions. mBank also offers free support when customers have been victims of cyber crime.

### Ensuring data protection

Commerzbank Aktiengesellschaft takes the protection of personal data very seriously and complies with the applicable data protection rules, in particular the provisions of the EU General Data Protection Regulation and the Group Data Protection Policy. The purpose of this policy is to ensure a consistently high level of data protection in the Group and to respect the fundamental rights and freedoms of data subjects. It includes principles applicable Group-wide for the collection, processing, use and international transmission of personal data.

Making sparing, proportionate, necessary use of personal data only within the legally permissible limits is a right under the Charter of Fundamental Rights of the European Union, to which Commerzbank is expressly committed. This also includes processing only for a specific purpose and ensuring transparency towards and the provision of information to the data subject. Commerzbank also transfers personal data to third parties only if this is lawful and it is not apparent that there is a risk to the fundamental rights and freedoms of the data subject; this includes transfers of personal data to authorities. Personal data is deleted as soon as it is no longer required for business purposes and there is no other legitimate reason preventing deletion. We can demonstrate that we comply with the principles governing the processing of personal data.

Commerzbank investigates inquiries, complaints, requests for information and breaches of personal data protection without delay and keeps in close communication with the data subject, especially when there may be risks to their fundamental rights and freedoms. In addition, data subjects can contact Commerzbank's data protection officer at any time. To raise our employees' awareness of data privacy and data security issues and keep them informed, there are regular training sessions and mandatory educational programmes.

Commerz Real has a central data protection officer and data protection coordinators in the departments. In Poland, mBank's data protection officer and the associated team support the Bank's business units, based on the Personal Data Security Policy and the Policy for Personal Data Management over Time.

Given that the Bank has almost 11 million private and small-business customers in Germany and around 5.8 million private and small-business customers in Poland, the Czech Republic and Slovakia, plus around 25,500 corporate client groups worldwide, the number of data protection complaints was again comparatively low in 2023. For example, the data protection officer of Commerzbank Aktiengesellschaft in Germany received 221 customer complaints by the end of the year under review. In most cases, the complaint was that data had been put to unauthorised use or had become known to third parties.

### Using big data responsibly

Efficient and holistic data processing offers great opportunities for all segments and Group divisions: as a basis for decision-making in the management of operational processes, for more detailed and faster analysis, and for improved service and cross-selling. At Commerzbank Aktiengesellschaft, responsibility for this area lies with the Big Data and Advanced Analytics (BDAA) Group unit. As a centre of competence for machine learning (ML) and artificial intelligence (AI), BDAA is also responsible for the Group's AI strategy, in particular the further development of AI governance within the framework of the three lines of defence, as well as the establishment and provision of basic AI functionality and selected use cases.

#### Efficient and holistic data processing offers great opportunities



AI governance furthermore involves the employer side and the Group Works Council developing a common understanding of the use of AI and ML at Commerzbank in order to integrate employees and their know-how into new processes and changed ways of working. This allows the advantages of these technologies to be exploited while at the same time avoiding errors and misuse. BDAA provides methods for efficiently designing Group-wide models to calculate credit and operational risk as well as capital requirements, and to perform stress testing. This helps to ensure regulatory compliance and improve capital efficiency. To comply with the high data protection standards, Commerzbank Aktiengesellschaft works with pseudonymisation, anonymisation and micro-segmentation.


### Maintaining dialogue

For us, product transparency and fairness towards our customers mean providing holistic and comprehensible advice on financial products, their risks and possible alternatives in accordance with long-term needs. This also includes documenting the advisory process in transparent fashion. In recent years, we have

introduced new products and services with particular customer benefits. These include a green ecosystem, green mortgage loans and the new “money mate” investment solution.

All Group units actively engage with their customers so as to take account of usage requirements in the (further) development of products and services. This ensures that the customer and/or user experience (CX/UX) with our products, services and channels meets up to our quality standards. From idea development and conception to design and development, customers are involved in the various product stages. This gives rise to a continuous dialogue, including in a UX studio set up specifically for this purpose. The comdirect brand also carries out activities to foster customer loyalty within the “comdirect community”, where customers and others with an interest in the financial markets can discuss products and other financial topics with one another as well as with the Bank.

**All Group units actively engage  
with their customers so as to take account  
of usage requirements**



Commerzbank Aktiengesellschaft’s Corporate Clients segment takes account of regular customer surveys on specific topics in order to develop its range of products and services. This provides us with information on customer preferences and requirements, which can be used in the design of products and processes. In addition, Commerzbank Aktiengesellschaft actively involves its customers through various customer advisory councils. In a central advisory council and various regional advisory councils, selected figures from companies, institutions and public life have the opportunity to enter into direct dialogue with the Board of Managing Directors, find out about the performance of the business and contribute their experience and expectations.

### Surveying target groups

SME topics are at the heart of Commerzbank’s “Unternehmerperspektiven” initiative (Business Owners’ Views). Once a year it surveys owners and top-level managers from companies of different sizes and from different industries. In 2023, 1,500 companies were surveyed as part of a study entitled “Wirtschaft nach der Zeitenwende: Wie resilient ist der Mittelstand” (Economy after the turn of the century: How resilient are SMEs?). The study employs a breakdown based on industry and size, with size brackets ranging from annual sales of €2–15m to over €250m. The survey of first-level managers focused on core topics such as current challenges and dealing with crisis situations, assessing company resilience and preparing for future crises.

### Improving advisory services

With the amendment of the MiFID II Directive as part of the EU Action Plan on Financing Sustainable Growth, it became mandatory to ask about sustainability preferences when providing investment advisory and financial portfolio management services. Our investment advisory teams received intensive training on this topic. As part of the fact-finding stage, we educate customers about the three sustainability standards defined in the guideline and ask about their sustainability preferences. Where they have a sustainability preference, customers subsequently decide on the share of their investments to be put into sustainable assets. The advisory universe in the Private and Small-Business Customers segment comprises some 500 financial instruments that meet at least one of the sustainability standards defined by MiFID II. Regardless of this, sustainability is generally an integral part of various consulting tools, for example in dialogue with our small-business customers and in wealth management.

Commerzbank Aktiengesellschaft is building up a green ecosystem for sustainability-related issues that lie outside our core competencies. In 2023, we launched the Impact Solutions platform together with our subsidiary neosfer. This free Internet platform hosts a variety of sustainable solutions and services for our corporate and small-business customers, including providers from the areas of energy efficiency, mobility, resource conservation and consulting services. In this way, we offer innovative companies the opportunity to position themselves on the market and gain access to a large customer base. At the same time, we support our customers in driving forward their sustainable transformation.

On top of this, we have entered into several cooperation partnerships, among them with Global Changer, a technology company with environmental services that helps our corporate and small-business customers reduce their CO<sub>2</sub> emissions and thus achieve their climate targets.

Private customers can use a CO<sub>2</sub> calculator in the banking app and on the Commerzbank website to work out their approximate personal carbon footprint based on a questionnaire about their mobility and consumption habits and their living situation. This application is supplemented by information on sustainable lifestyles and sustainable product offerings from Commerzbank. Our private customers also receive advice on the topic of “acting sustainably” in their online banking via the “FinanzKompass” digital advisory tool, where we give individual recommendations on changes they can make in their day-to-day lives such as activating their electronic mailbox to save paper.

To make Commerzbank’s products and services available to all interested parties and customers, we also go to great lengths to ensure that our branches and online offering are fully accessible.



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Around two-thirds of our branches are accessible at ground level. We strive to ensure accessibility for all user groups where possible whenever we renovate a branch or install an ATM. All self-service terminals in the self-service areas of Commerzbank Aktiengesellschaft are equipped with (partial) read-aloud functions for the visually impaired. Further information on our efforts to be inclusive, including towards our employees, can be found under “Driving inclusion”.

## 5. Leading by example

We are conscious of our responsibility as a company and want to make an active contribution to the transformation to a resilient society that is both socially and environmentally sustainable. That is why we not only want to support our customers in their transformations, but also to set a good example ourselves. We will achieve this, among other ways, by continuously reducing our environmental footprint. At the same time we want to be a reliable partner for our stakeholders, and our actions are guided by ethical values such as integrity and fairness.

In addition, we take our responsibility as an employer seriously and promote diversity and equal opportunities in practice. Lastly, we positively influence our environment through our voluntary commitment to charitable causes and our foundations.

### Reducing operational emissions

Commerzbank Aktiengesellschaft has had an



ISO 14001-certified environmental management system in place ever since 2009, followed in 2015 by an energy management system certified to ISO 50001. We have established an integrated environmental and energy management system (iUEMS) in accordance with our environmental guidelines, which defines the responsibilities, behaviour, processes and specifications for the implementation of the operational environmental and energy policy and documents these in a structured manner. The focus is on optimising resource consumption, particularly where we can have a direct impact on the environment, such as in building management and business trips.

First and foremost, the iUEMS serves to continuously improve our own environmental and energy performance. At the same time, it helps minimise risk: by regularly observing and checking the current situation, any need for action can be identified at an early stage and preventive measures can be taken.

This integrated management system forms a basis for ensuring our business has a sustainable orientation. The overarching materiality analysis is used to determine the focus topics of the iUEMS as part of measuring their internal relevance for our own banking operations. The topics of climate protection and adaptation, environmental protection, biodiversity, resource use and conservation, and circular solutions were classified as relevant. We also measure and analyse potentially influential environmental impacts with regard to these topics, with a strategic focus on the aspect of climate protection.

**The focus is on optimising resource consumption, particularly where we can have a direct impact on the environment**

We achieve savings in our operational emissions through efficient and sustainable building management in particular, and we are taking various measures to achieve this. Among other things, we have implemented software to optimise building management technology at two locations. The programme controls the operation of the systems in a forward-looking manner, taking into account the weather.

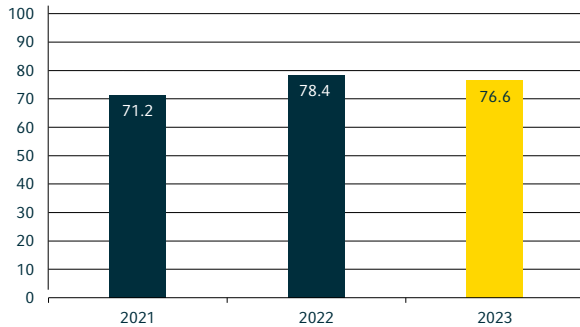
We continuously review the energy efficiency of our buildings using defined energy performance indicators. We were able to reduce the electricity consumption measure at both locations. Following this positive experience, we are now examining the introduction of such software at additional locations.

In addition, special attention is paid to making travel activities as environmentally friendly as possible and thus preventing CO<sub>2</sub> emissions. The business travel policy therefore envisages rail as the preferred means of transport. This also means avoiding air travel wherever possible. The Bank subsidises electric vehicles in its car leasing schemes. In addition, Commerzbank pays its employees in Germany a monthly mobility allowance of €20 for commuting by public transport, which since 2023 also applies to the Deutschlandticket. The range of climate-friendly alternatives also includes bicycle leasing programme.

Key figure: In 2023, Commerzbank Aktiengesellschaft generated 76,591 tonnes of CO<sub>2</sub>-equivalent total emissions.



**Total CO<sub>2</sub> equivalent emissions**  
1,000 tons



This is slightly higher than in 2021, which had been heavily impacted by coronavirus measures, but well below the emissions of previous years. The reasons for this include technical adaptations for energy efficiency in building management and changes in occupational mobility, as well as the progress made with implementing the “Strategy 2024” programme. We had set ourselves the goal of reducing our greenhouse gas emissions by 30% by 2025 (relative to the base year 2018). We in fact already achieved this goal in 2022, with CO<sub>2</sub> emissions of 78,402 tonnes, equating to a decrease of 34.9%. We were able to reduce our operational carbon footprint even further in 2023, despite the resurgence in business travel. Our 2023 CO<sub>2</sub> emissions of 76,591 t constitute a decrease of 36.4% compared to the 2018 base year. We have been offsetting Commerzbank Aktiengesellschaft’s currently unavoidable emissions in Germany since 2015, and globally since 2021. The Bank thus operates in a mathematically climate-neutral manner.

#### Operational CO<sub>2</sub> emissions of Commerzbank Aktiengesellschaft

Tonnes CO <sub>2</sub> equivalents	2023		
	Germany	Other countries	Total
Scope 1	16,717	701	17,418
Scope 2 location-based	52,768	6,599	59,367
Scope 2 market-based	7,883	4,984	12,867
Scope 3	37,630	8,676	46,306
<b>Total</b>	<b>62,230</b>	<b>14,361</b>	<b>76,591</b>

The table shows the CO<sub>2</sub> emissions of Commerzbank Aktiengesellschaft according to the global categorisation by the Greenhouse Gas (GHG) Protocol. Scope 1 designates the emissions caused directly, for example through the consumption of natural gas, heating oil or fuel. Scope 2 refers to emissions from purchased energy. These can be calculated based on either the

energy mix actually purchased (“market-based”) or the statistical country mix (“location-based”). We use market-based scope 2 emissions to calculate our total emissions. Scope 3 captures other indirect emissions from the upstream and downstream value chain. These include paper and water consumption, business travel and commuting, and other emissions from energy supply. The indirect emissions from our financial products (“financed emissions”) are not included in the calculation of the operational carbon footprint. Commerzbank determines its greenhouse gas emissions on the basis of the standard developed by the Association for Environmental Management and Sustainability in Financial Institutions (VfU). This is based on international guidelines for environmental and climate reporting, such as the GHG Protocol, CDP and the Global Reporting Initiative. Emissions are calculated as CO<sub>2</sub> equivalents. To calculate the carbon footprint, consumption is first determined for the respective categories (e.g. paper and water consumption) and then converted into CO<sub>2</sub> equivalents using specified conversion factors. This results in aggregated CO<sub>2</sub> equivalents in the individual categories (see disclaimer on page 77).

#### Embodying collegiality

The corporate success of the Commerzbank Group is based on qualified and motivated employees. Our approximately 42,000

colleagues worldwide contributed their knowledge and experience to our work processes in 2023. A fundamental appreciation of the importance of fairness, respect of others and lived diversity is anchored in our company values and our Code of Conduct; it is our responsibility as an employer to ensure its implementation. Commerzbank Aktiengesellschaft aims to offer its staff a working environment characterised by a spirit of partnership. Our human resources policy makes it possible to promote the development of each individual employee and collegial cooperation, even in a challenging economic setting.



**Commerzbank aims to offer its staff  
a working environment characterized  
by a spirit of partnership**

Commerzbank Aktiengesellschaft made good progress in the year under review with the transformation of the Bank as part of “Strategy 2024” and the resulting loss of jobs. The necessary headcount reduction has been achieved almost in its entirety. This is being done in a socially acceptable manner, and the majority of employees have left or will have left the Bank with retirement arrangements by the end of 2024.

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The Bank's far-reaching changes have demanded a lot from employees over the past three years. This is also reflected in the results of the most recent "Pulse Check" survey in autumn 2023. The majority of employees at Commerzbank Aktiengesellschaft enjoy their work, consider collaboration with their direct manager to be based on a relationship of trust and value the freedom they are granted to make decisions. However, the survey also revealed need for action, including in the areas of workload and trust in top management, as well as regarding the willingness to recommend Commerzbank as a financial service provider and as an employer. In individual follow-up processes, the responsible members of the Board of Managing Directors and their management boards are now pursuing measures to improve those areas that were rated as inadequate in their respective segment. But that is not all: With the "Strategy 2027", the workforce-related satisfaction scores will be used from 2024 onwards as a control variable alongside established financial indicators and customer satisfaction.

We also focused in the year under review on challenges such as demographic change and the resulting shortage of skilled workers. In 2023, Commerzbank entered a new phase of transformation and is explicitly focusing on the next generation as an investment in the future. One of the pledges made as part of the young talent campaign was to recruit and nurture graduates, as part of which apprentices or students combining a degree course with work placement are promised a permanent employment contract if they exhibit the appropriate personal and professional suitability. Accordingly, the young talent campaign marks the first integral component of the strategic recruiting initiative, which focuses on planning and implementing the investments in recruiting personnel to Commerzbank that are needed following the headcount reduction phase over the course of 2023 and 2024. In 2023, these included increasing recruiter capacities and introducing a campaign to recruit new employees through existing employees at the Bank. In view of the changed labour market, we have formulated the medium-term goal of refining our approach to recruiting, placing the applicant at the centre.

Further initiatives to ensure that the Bank has a healthy pipeline of future talent are firmly embedded in the HR strategy: our extensive training offering, innovative learning programmes and the opportunity to pursue many different development paths should make the Bank attractive for talented young people.

As part of the Sustainability Report in accordance with the Global Reporting Initiative (GRI Report), we provide detailed information on personnel-related topics.

## Developing employees

Commerzbank Aktiengesellschaft offers optional and mandatory training modules, such as seminars, workshops and e-learning

courses, designed to prepare employees for the transformation of the banking sector resulting from digitalisation and develop their skills on an ongoing basis. The voluntary basic qualification on the topic of sustainability for all employees of Commerzbank Aktiengesellschaft in Germany was supplemented by an advanced qualification in 2023. This qualification is specifically designed for employees with customer contact, helping us to strengthen our expertise in front-facing positions and consolidate the understanding of sustainability among the workforce.

We have also expanded the compulsory and standard qualifications to include a third pillar that revolves around self-determined, interest-based digital learning. With "Lernzeit+" (Learning Time+), Commerzbank Aktiengesellschaft provides all employees with an optional working time quota. Access to this digital offering is provided via the learning experience platform cliX.



### The voluntary basic qualification on the topic of sustainability was supplemented by an advanced qualification in 2023

Commerz Real offers a model in HR management in which employees can choose between variable working hours and trust-based flexitime. It also attaches great importance to the ongoing training of its employees. Virtual formats such as the Sustainability Session and Digi Sessions are a platform for cross-disciplinary presentation and discussion of the topics of sustainability and digitalisation in the real estate and renewable energy sectors and in equipment leasing. Commerz Real also permits all employees to use the "Learning Time+" model to devote to twelve hours of their working time per quarter on further education or training courses. In 2023, Commerz Real, in collaboration with the German Society for Sustainable Building (DGNB), launched its first mandatory basic training on sustainable, ESG-compliant real estate management for all employees. The training provides up-to-date knowledge on the topic of sustainability and its application in industry standards and practices, making an important contribution to implementing the Sustainable4Life sustainability strategy.

## Maintaining health

Health is the basis for a properly functioning organisation and workforce alike. That makes strategic health management another key element in Commerzbank Aktiengesellschaft's HR activities. Advancing digitalisation and the associated opportunities for mobile working are constantly changing the requirements in the world of work. We want to empower employees and managers to deal with this change under their own responsibility and in a way that promotes health. To this end, we offer them a wide range of preventive measures such as professional advisory and information services. The employee offering includes traditional in-person appointments as well as alternatives such as webinars, audio formats and video consultations with company doctors and with Employee Assistance Programme advisors.

In occupational healthcare management, we place a particular focus on prevention. Information, education and exchange formats play an important role in this regard. With the regular health dialogue introduced in 2023 as an exchange platform for those involved in occupational healthcare management at Commerzbank, we are providing impetus and also developing offerings for responsible management. Commerzbank also supports senior staff in health prevention with an employer-financed check-up.

**Health is the basis for a properly functioning organisation and workforce alike**

The same applies to Commerz Real. As part of its commitment to its employees' health and satisfaction, the company both develops its own concepts and implements measures in cooperation with the parent company. Since 2022, Commerz Real has been rolling out the new Com.Work office concept across the board. Employees can get involved in redesigning the office space. In addition to offices that can be booked flexibly, spaces are also being created for intensive video calls, interaction or relaxation, for example.

As the pandemic stabilised, mBank introduced a hybrid working model, which is implemented according to the specific circumstances in sales and contracts units, in operations and in IT. It combines the advantages of office work and working from home and allows the best workplace to be chosen based on the specific tasks to be done. mBank has also launched the "Energised for Health" advice programme. This includes courses and training to help employees cope with stress and pressure.



## Promoting diversity and equal opportunities

For more than three decades, our Diversity



Management unit has been working to achieve an open and fair environment in which everyone feels appreciated. Diversity and inclusion are anchored throughout the Group using a governance structure with representatives from all areas of the Bank. The central committee for strategic alignment is the Global Diversity Council, which is chaired by the member of the Board of Managing Directors responsible for Human Resources. With all business units taking part and support provided by regional councils at various locations abroad, this approach makes it possible to take country-specific differences and needs into account.

Globally, the Group employs people from 122 nations. Their diverse origins vitalise and enrich interactions. Differences in viewpoint and experience lead to new ideas.

Like its parent company, Commerz Real is a signatory to the Diversity Charter. Employee awareness of the issues of diversity and inclusion is raised through presentations, and human resources processes are checked to determine whether they ensure equal opportunities and diversity. Parallel to this, mBank in Poland is further developing its Diversity and Inclusion Policy and is a signatory to the Diversity Charter of the Responsible Business Forum. The Diversity and Inclusion Policy not only summarises mBank's efforts to date, but is also as a key component of the strategy for the coming years, in keeping with the ESG social responsibility goals.

**Worldwide, the Commerzbank Group employs people from 122 nations**

All measures to promote diversity at mBank are overseen by the member of the Board of Managing Directors responsible for diversity and inclusion, who is charged with building a diverse work environment and coordinating the initiatives planned in the policy and any measures resulting from this. Since 2022, all employees have completed e-learning courses on the topics of diversity and inclusion. In January 2023, mBank was for the third time listed in the global Bloomberg Gender Equality Index, which tracks the performance of public companies that actively promote gender equality in their working environment. mBank is also included on the "Diversity IN Check" list for 2023. This is published by the Responsible Business Forum and recognises the employers in Poland who are setting the bar in their management of diversity and inclusion.

## Work-life balance

Alongside professional development, work-life balance is an important aspect of remaining attractive as a business. Within Commerzbank Aktiengesellschaft, this balance is ensured by concepts for different stages of life with specific offerings, such as flexible working time models, sabbaticals and programmes to facilitate the return to work after parental leave.

We also offer advisory and support services relating to childcare, home care and care for the elderly through pme Familienservice. With an ageing workforce, taking care of relatives is becoming increasingly important. Our offerings aim to raise awareness about how to strike a balance between caregiving and work and to impart knowledge about the topic of caregiving in our working environment.

We have agreed with the Works Council that we will continue and expand the working from home arrangements in Germany even after the coronavirus measures have been lifted. Provided that remote working is feasible from an operational perspective, branch employees were able to work remotely for up to 50% of their working hours; at headquarters and in the digital consulting centres, the figure was high as 70%. In addition to the positive experiences with flexible working during the coronavirus pandemic, the overriding factor that persuaded us to take this step was the clear desire of the workforce for greater flexibility in where they work. In 2023, Commerzbank worked with employee representatives on a new rule governing flexible and hybrid working. This will come into force from spring 2024.

## HR geared to different phases of life

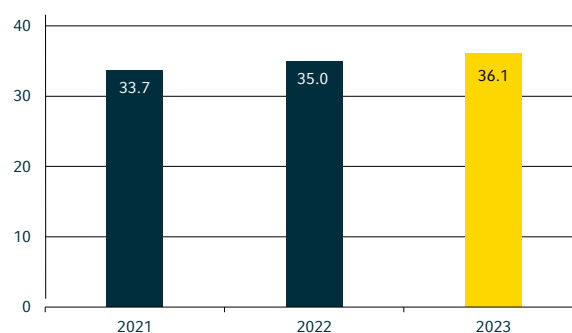


## Increasing equal opportunities

Although a small majority of Commerzbank staff are female (around 51%), women are not yet represented at management level to the same extent. For this reason, in recent years the measures designed to promote a good work-life balance have been further improved to open up fresh career opportunities for parents in particular. These include company childcare, part-time models – including for managers – and structured return-to-work options to prevent careers from stalling.

Key figure: At the end of 2023, 36.1% of management positions across the Group were held by women.

**Women in leadership positions**  
in %



These measures enabled Commerzbank to increase the proportion of women in leadership positions to more than 36% Group-wide last year. The Board of Managing Directors has set a new goal of 40% across all management levels by the end of 2030 (management levels 1 to 4 and project managers at level 5). All divisions of Commerzbank Aktiengesellschaft are explicitly tasked with actively approaching suitable female employees during the recruitment process. For example, one Risk Management initiative focused on equality, mental health and internationalism under the banner “Colourful Group Risk Management”. Group Services also celebrated the lived diversity of its workforce through the “COO.bunt” (COO.colourful) campaign. The aim is to further increase the proportion of female candidates for management positions when filling new positions. A detailed overview of the proportion of female employees broken down by management level can be found in our GRI Report.

## Driving inclusion

The inclusion of people with disabilities is another integral component of our diversity strategy. With our inclusion action plan, which was published on the basis of the UN Convention on the Rights of Persons with Disabilities (UN CRPD), in 2018 we became the first bank in Germany to make a voluntary public commitment on the issue. In the action plan we have committed to

goals and measures aimed at improving the situation of people with disabilities within Commerzbank. This includes employees, customers and suppliers of the Bank and encompasses barrier-free access to the workplace and to working tools as well as the implementation of accessibility in our digital offerings for customers. Our efforts apply equally to the next generation. With that in mind, we advertise on myAbility, a job platform for people with disabilities that aims to further promote diversity and inclusion. On top of that, in 2023 we continued to work on implementing appropriate measures and launched a follow-up action plan for Inclusion 2.0.

The result: Commerzbank Aktiengesellschaft has consistently exceeded the legal requirement of 5% employees with disabilities in recent years, and – at 5.6% the year under review – met the quota in 2023 as well.

### Treating each other with respect

A working environment that is free from prejudice, typified by mutual respect and acceptance is essential for an atmosphere where everyone is able to thrive. This is especially important in a group such as ours that employs people from over 120 nations. We do not tolerate discrimination at Commerzbank. Any form of unfavourable treatment of people based on their gender, nationality, ethnic origin, religion or beliefs, disability, age, sexual orientation or gender identity constitutes a violation of human dignity and infringement of personal rights.

As part of our mission of promoting an open and honest approach to dealing with the topic of sexual orientation and the gender identity of employees, customers and business contacts, Commerzbank Aktiengesellschaft focused on several transgender initiatives in 2023. These included reviewing our processes and forms to ensure that customers are addressed in neutral terms, and also adding a gender-neutral option to the standard forms of address, for example when opening an account. In addition, since 2023, Commerzbank and comdirect have given people who are transitioning the opportunity to have their debit and credit cards reissued in a name that affirms their new gender, if they wish.

**“More diversity. More acceptance. More Pride.”  
was our motto for the 2023 Pride season**

Through publication of the “Prout Performer” lists, the Prout@Work Foundation recognised individuals from business and public life who stand up for the interests of lesbian, gay, bisexual, trans, inter and queer people and become role models. Another ten Commerzbank employees received awards in the year under review.

Commerzbank also takes a clear stance in public. “More diversity. More acceptance. More pride.” was our motto for the 2023 Pride season. At Christopher Street Day, we again took part in the parade with our own Commerzbank float. As in the previous year, the Commerzbank Tower was lit up to celebrate Pride, and colourful versions of the Bank’s logo appeared in digital channels and applications.

## Ensuring integrity and compliance

Integrity is the basis of our business model. We act in an attentive, trustworthy and reliable manner. The globally binding Code of Conduct



summarises our understanding of impeccable ethical and moral behaviour. It goes beyond legal and regulatory requirements and sets standards for Commerzbank Group employees and service providers.

The focus of Commerzbank’s compliance activities is on preventing and uncovering money laundering, terrorist financing, market abuse (insider trading and market manipulation), fraud, corruption and other criminal acts and ensuring compliance with financial sanctions and embargoes wherever the Bank does business, as well as on protecting investors. We also ensure that insider information and other confidential data about our customers and their transactions are protected in accordance with the need-to-know principle. Commerzbank Aktiengesellschaft’s Compliance division has wide-ranging authority and escalation rights, including powers to obtain information and carry out investigations, enabling it to implement its requirements throughout the Group.

### Managing compliance risks

As a proactive risk manager, Group Compliance manages compliance risk throughout the Group and thus lays the foundation for compliance with laws, ethical standards and regulations. Our goal is to effectively manage compliance risks and identify them at an early stage before they materialise. Compliance risks are identified and managed across all compliance risk types as part of the compliance programme that has been put in place and is continuously refined. Components of the programme include a regular Group-wide compliance risk analysis, internal safeguards, and controls to assess the adequacy and effectiveness of the compliance management system.

In order to satisfy the requirements of increasingly complex national and international legislation and regulations, the Group is continually developing its compliance risk management and bringing this in line with current developments and challenges.



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In the area of sanctions compliance, a top priority is the implementation of comprehensive sanctions and embargoes against Russia. Recent regulatory measures have focused on combating the evasion of sanctions and embargoes. To ensure that the imposed sanctions have the greatest possible effect, the most recent restrictive measures entail increasingly detailed requirements, including detailed exemption provisions, which must be observed when implementing the sanctions provisions.

The German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) came into force on 1 January 2023. One of its main objectives is to improve the protection of human rights in supply chains. Under the act, Commerzbank is required to identify and prevent violations of certain human rights and certain environmental obligations at direct and indirect suppliers and in its own business activities.

Within Commerzbank, the principles of the “three lines of defence model” also apply in this area, as part of risk management, with the goal of identifying, preventing and remedying risks and breaches in supply chains. Commerzbank has set up a comprehensive compliance programme to ensure that these requirements are met. Group Compliance will act in the second line of defence as the “global functional lead”, in which capacity it will define minimum Group-wide standards for the Bank.

When the LkSG came into force, we updated and published a policy statement on the company’s due diligence obligations with respect to human rights and environmental risks as well as Commerzbank’s position on human rights. Furthermore, the Chief Compliance Officer was appointed as the Bank’s human rights officer. 2023 saw the finalisation of the expanded compliance management system to include the requirements of the LkSG and its integration into the foreign units and relevant subsidiaries.

#### **Group Compliance lays the foundation for compliance with laws, ethical standards and regulations**

This global policy for the protection of human rights and the environment defines the principles for dealing with human and environmental rights in the supply chain and sets the minimum standards for fulfilling the requirements of the LkSG. The law requires that companies carry out an annual and event-based risk analysis. The focus here is on uncovering risks for vulnerable groups that arise from the operational business of Commerzbank Aktiengesellschaft – known as the “inside-out” perspective.

These legal requirements are specified in the handout on implementing a risk analysis according to the specifications of the German Act on Corporate Due Diligence Obligations in Supply Chains of the Federal Office of Economics and Export Control (BAFA) from August 2022.

Commerzbank carried out an initial risk analysis for the first time in 2022 and evaluated both Commerzbank Aktiengesellschaft’s direct suppliers and its own business area. Limited inherent risks were identified among suppliers in relation to the legal positions of “forced labour and slavery”, “disregard for occupational safety and work-related health risks”, “withholding of appropriate wages” and “destruction of the natural basis of existence through environmental pollution”. Risk-appropriate prevention measures were taken. However, no remedial action was necessary because there was no knowledge of past or imminent violations of the protected legal positions. Commerzbank has subsequently expanded the policy statement to include rights-holder groups, ship crews and groups of people dependent on fishing and tourism who could potentially be affected by these risks.

Commerzbank is firmly committed both to preventing and to punishing white-collar criminal acts and violations of legal, regulatory or internal requirements in connection with Commerzbank. To that end, Commerzbank has for many years operated an ISO data protection-certified electronic whistleblower system for submitting complaints and tips on issues in the categories of “human rights violations” and “environmental violations and risks”. Reports can be made by name or anonymously. All information is treated in the strictest confidence and all personal data are protected.

#### **Fighting corruption effectively**

In our fight against corruption and bribery, we go further than simply focusing on statutory requirements such as the German Criminal Code, the UK Bribery Act or the US Foreign Corrupt Practices Act. We also adhere to the principles of the UN Global Compact and the OECD’s Guidelines for Multinational Enterprises, and comply with the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. These external standards are supplemented with internal guidelines, which are reviewed at least annually and updated as needed: Commerzbank’s Global Anti-Bribery and Corruption Policy (ABC Policy) actively seeks to combat bribery and other forms of corruption.

To this end, we conduct regular training sessions for our employees so that they can implement our guidelines competently and consistently. A central element of this is the annual anti-corruption training for all employees.



Business and functional units with heightened risk profiles and individuals who have an increased risk of bribery and corruption due to their functions at Commerzbank Aktiengesellschaft receive additional targeted training.

**Through our Global Anti-Bribery and Corruption Policy,  
we actively seek to combat bribery and  
other forms of corruption**

A team with special training in this type of risk is available to provide advice to all employees. Commerzbank has a zero-tolerance approach to corruption and other criminal acts by employees. Any employee who is proven to have breached this will face the full consequences under labour, civil and criminal law. Key figure: As in previous years, there were no known cases of corruption in the Commerzbank Group in 2023.

## Working for the good of society

With regard to its social commitment,



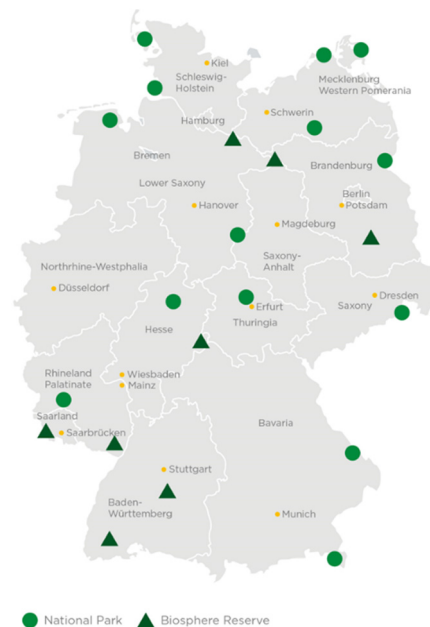
Commerzbank engages with its environment in a variety of ways. Various projects and initiatives developed together with partners from business and society contribute to the good of society. Commerzbank Aktiengesellschaft in Germany also donated a total of €690,113 to various institutions and organisations in the year under review.

As in the previous year, Commerzbank decided not to produce a big Christmas film for its customers in 2023 and instead donated the money to charitable causes. The donation by the Bank combined with the participation of employees and customers helped collect €500,000 for food banks in Germany in 2022. In 2023, the campaign benefited brotZeit e.V. – an association that promotes equal opportunities by providing free breakfasts at primary schools and schools for children with learning difficulties.

The Hamas terrorist attack on Israel likewise caused a great deal of shock and dismay at Commerzbank. In order to send a clear signal against all forms of hatred and anti-Semitism, we took a stand on the issue in October 2023 by means of an advertisement in two national Sunday newspapers, together with numerous other German companies.

One example of our social and environmental engagement is the Commerzbank environmental internship launched with the German national parks back in 1990. In 2023, it again provided around 60 students with practical experience in the areas of environmental education and public relations in national parks and biosphere reserves. Commerzbank finances the internships, while the umbrella organisation Nationale Naturlandschaften e.V. organises the programme, and the protected areas provide the interns with hands-on training and support. More than 2,000 students have now completed an environmental internship and subsequently applied their experience to business, politics, society or environmental protection.

## Environmental internship partner



Commerzbank Aktiengesellschaft is also involved in the “Finanz-Heldinnen” (“financial heroines”) initiative to get more women interested in finance. The initiative was set up in 2018 by a group of female comdirect employees with the aim of making a positive contribution to society. To help women become better acquainted with the topic of finance and make independent financial decisions, the financial heroines convey their knowledge through a variety of formats, including an online magazine, podcasts, afterwork events and an Instagram channel, as well as the bestselling book “Der Finanzplaner für Frauen” (Financial planner for women).

As a corporate citizen, Commerz Real wants to make an active contribution to society in the communities in which it operates. Donations of money, material and time are mobilised for this purpose each year. For example, Commerz Real makes a financial contribution to selected social organisations that support

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disadvantaged children. In addition, employees fulfil children's Christmas wishes with donations in kind as part of the "Wish Tree Campaign". At the Social Days 2023, just like in the previous year, employees were given the opportunity to invest their time for a good cause: on one day, more than 140 people embraced the spirit of social commitment and helped out on the ground in social meeting places. The aim was to improve networking for residents in places with greater social needs, to reduce prejudices and to improve living situations in the area. Commerz Real is also continuing its existing work supporting disadvantaged children and promoting digital education at schools.

In 2023, mBank was the exclusive banking partner and sponsor for the sixth time of the Great Orchestra of Christmas Charity Foundation (GOCC). Via its customers, mBank has raised a total of more than €22m (97m Polish zloty) for the initiatives selected by the GOCC Grand Finale over the last six years.

The war in Ukraine is a constant presence, especially in neighbouring Poland. mBank started a partnership with a non-governmental organisation – the Polish Centre for International Aid (PCPM) – allowing customers to donate money to help people fleeing the war. The Bank's online payments enable donations to be linked directly to this organisation. More than €3m (14m Polish zloty) were donated by customers. Customers can deposit money via online banking, the mobile app or the website using the "Ich helfe" (I'd like to help) button developed with Paynow. PCPM provides these funds for the reconstruction of destroyed Ukrainian cities, schools, hospitals and other critical infrastructure, so that refugees can return to their homes. A Ukrainian primary school for around 230 students was housed at mBank's premises in the 2022/2023 school year.

### Foundations for the future

Various foundations supported by the Group over the long term also make a significant contribution to society. As a corporate foundation, the Commerzbank Foundation promotes the social responsibility of its founding company to work towards a society fit for the future. Its motto is: Participation creates the future. With its independent foundation, Commerzbank takes responsibility for its sustainable commitment to be a "good citizen" of the community that goes beyond its actual business activities. Since it was established in 1970, the Commerzbank Foundation has built up many partnerships across Germany and has thus become a firmly established provider of support in the world of German foundations. In its more than 50-year history, it has provided a total of around €40m to support well over 1,000 projects relating to cultural, social and scientific activities. Its partnership network

ranges from museums and theatres to non-profit social organisations and scientific institutions, from national lighthouse projects to exemplary local initiatives.

### The Commerzbank Foundation focuses on culture, social issues and science

The funding always supports cultural education and mediation, social participation for disadvantaged people and incentives for young researchers. In addition, seven social foundations have been established to provide financial support to active and retired employees in unforeseeable emergencies. The common aim of all the foundations is to make a long-term and sustainable contribution to the future viability of society. Commerzbank Aktiengesellschaft provided a total of €638,000 in funding for these foundations in 2023, covering expenses such as staff, workstations, premises costs and other operating costs.

### Commerzbank provided a total of €638,000 in funding for the seven social foundations in 2023

mFoundation in Poland focuses on mathematical literacy. It supports children, parents, teaching staff, students and young scientists with multiple funding programmes. In 2023, this included programmes for schools and nursery schools and a competition for the best academic thesis in mathematics. Young artists are another focal point. Through its "M für mBank Malkunst-Sammlung" (M for mBank painting collection) fund, the Bank buys paintings by up-and-coming Polish artists. These artworks are selected on behalf of mBank by a committee of highly regarded representatives of the art market and a representative of mBank. By the end of 2023, the collection consisted of 131 works of art.

## Composition of the €300bn target<sup>1</sup>

Sustainable products	Allocation to the €300bn volume target
<b>Products in the Private and Small-Business Customers segment</b>	
• Green mortgage loans	Commerzbank includes the entire portfolio of green mortgage loans in its sustainable business portfolio.
• KfW programmes for private and small-business customers	Commerzbank includes the entire portfolio of credit lines granted in these products in the sustainable business portfolio. In addition, future programmes with clear environmental benefits are included in the calculation from the time they become available.
• KlimaDarlehen (formerly Green CBU)	Commerzbank includes the entire portfolio of commercial universal loans with a sustainability-oriented purpose in the sustainable business portfolio.
• Sustainable asset management	The assets managed in Commerzbank's sustainable asset management are deemed to be entirely sustainable assets.
• Securities advisory	All assets under management in the categories "Article 8 product" and "Article 9 product" according to the EU disclosure Regulation are considered sustainable products at Commerzbank.
• klimaVest	Commerzbank calculates the total volume of the fund as the volume of sustainable products, minus the volume held in Commerzbank depositories, in order to avoid double counting with the securities advisory category
• hausInvest	Commerzbank calculates the total volume of the fund as the volume of sustainable products, minus the volume held in Commerzbank depositories, in order to avoid double counting with the securities advisory category
• Commerz Real Renewable Energies Fund II SCA SICAV-RAIF <sup>2</sup>	Commerzbank counts the entire volume of the fund as part of the volume of sustainable products. Since this is a special fund for (semi-)professional investors in the form of a reserved alternative investment fund (RAIF) within the meaning of the Luxembourg law of 23 July 2016 on reserved alternative investment funds, the shares issued are not recorded electronically, which means that double counting with the securities advisory category can generally be ruled out.
• Provisions	These are provisions in accordance with Allianz's sustainable investment strategy. Commerzbank includes the new business volume concluded by our customers in the respective financial year in the sustainable business volume.
• Securities business comdirect and onvista	The volume of products defined as ESG products in accordance with the EU Disclosure Regulation is added to the sustainable business portfolio (assets under management).
<b>Products in the Corporate Clients segment</b>	
• Financing of renewable energies	Commerzbank includes all financing commitments from the CoC Energy in its sustainable business volume.
• Sustainable bonds	Commerzbank allocates the total volume of sustainable bonds in whose issue it was involved as lead manager in the respective financial year to the sustainable business volume of that financial year.
• ESG/Sustainability-linked loans and promissory note loans	Commerzbank includes the total volume of these products in which it was involved by means of participation, coordination, structuring, syndication or placement in the respective financial year, in the sustainable business portfolio of that financial year.
• Public funding programmes for corporate clients	Commerzbank includes the respective volume of new business in the sustainable business portfolio. In addition, future programmes with clear environmental benefits are included in the calculation from the time they become available.
• Investment management	For the securities business, Commerzbank has made a classification in line with the EU Disclosure Regulation, which is described in more detail in the ESG Framework. In the Corporate Clients segment, all portfolio items in the "ESG products" and "ESG impact products" categories are also considered sustainable products. In addition, the sustainable business portfolio also includes investments brokered by the Corporate Clients segment in cooperation with external asset managers (e.g. special funds) and investments in companies pursuing a recognised sustainable strategy.
• Foreign trade finance	The applicable criteria to which parts of Trade Finance transactions are allocated to sustainable business volume are based on the sustainable use of proceeds of bilateral loans (see Sustainable loans and promissory note loans). <sup>3</sup>

<sup>1</sup> Further information and explanations on the individual products can be found in the ESG framework on the Commerzbank website.

<sup>2</sup> Included for the first time in 2023.

<sup>3</sup> Only trade finance products for which a loan amount is actually extended, e.g. pre-export or post-import financing, are included in the sustainable business portfolio.

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## Disclaimer

The CO<sub>2</sub>eq emissions were determined according to VfU standard 1.1 (standard of the Association for Environmental Management and Sustainability in Financial Institutions) using the key figures in the version dated July 2022. External verification was performed based on ISO 14064-3 by DNV Business Assurance Zertifizierung GmbH. DNV is one of the world's leading providers of accredited management system certifications and considers itself an expert in assurance and risk management. DNV is committed to impartiality in its certification activities. The audit includes the qualitative and computational inspection of data and content, including conducting interviews with various specialists. The focus of the audit is on identifying data gaps and inconsistencies and evaluating methods for extrapolation. There is no complete review of the underlying data to achieve unlimited assurance.

The VfU standard is aligned with international environmental and climate reporting standards such as GRI and the GHG Protocol. The determined and verified consumption quantities are multiplied in the VfU tool by CO<sub>2</sub>eq emission factors, which are based on the EcoInvent database. EcoInvent is a platform of scientific and public institutions constituting one of the world's largest databases in the field of environmental accounting. Quality assurance is provided by scientific processes and assessments (critical review / peer review). In our capacity as user of the factors, we cannot evaluate these processes ourselves. The greenhouse gas conversion factors are provided by Greendelta. Greendelta's selection of EcoInvent processes and GHG factors was reviewed by the Öko-Institut research institute. The VfU has integrated additional control instances (both for the data in the database and for the selection of data used in the VfU tool).

More detailed information on consumption values can be found in Commerzbank's GRI Report 2023, which will be published in summer 2024.

## Appendix

### TCFD recommendations in the non-financial report

Recommendation	Statement	Reference
<b>Governance</b>		
<ul style="list-style-type: none"> <li>Disclose the organisation's governance around climate-related risks and opportunities</li> </ul>	<p>Commerzbank has a comprehensive sustainability governance setup. The Group Sustainability Board, which is a decision-making and escalation body chaired by the Chairman of the Board of Managing Directors, sets the Bank's strategic sustainability targets and monitors the measures for their implementation and management. Group Sustainability Management is responsible for the ongoing development of the sustainability strategy and coordinates all of Commerzbank's sustainability activities through the Group programme "Sustainability 360°". The Bank's sustainability governance is supplemented by the ESG Committee of the Supervisory Board and an external Sustainability Advisory Board, led by the Chairman of the Board of Managing Directors, to ensure a constructive and critical dialogue with our stakeholders.</p>	<ul style="list-style-type: none"> <li>Anchoring sustainability in our strategy: Governance structure consolidated</li> <li>Anchoring sustainability in our strategy: Pursuing net zero target</li> <li>Responsible management: Making our stance clear</li> </ul>
<b>Strategy</b>		
<ul style="list-style-type: none"> <li>Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's business activity, strategy and financial planning, where such information is material</li> </ul>	<p>Sustainability has been an integral part of our corporate strategy since as far back as 2020. Our current "Moving forward" strategy is based on the three pillars of growth, excellence and responsibility. Responsibility represents the entire sustainability spectrum of environmental, social and governance (ESG). Our net zero commitment forms the core of our sustainability strategy, which was approved by the Board of Managing Directors and published in the ESG framework. This strategy is subdivided into "transformation finance" and "sustainable finance" and defines exclusion criteria and minimum standards. As part of the materiality analysis, nine topics – including, in particular, climate protection and adaptation as well as biodiversity – were identified as material for us and incorporated into the annual Bank-wide strategy process in 2022.</p>	<ul style="list-style-type: none"> <li>Anchoring sustainability in our strategy: Key issues analysed</li> <li>Anchoring sustainability in our strategy: Pursuing net zero target</li> <li>Responsible management: Making our stance clear</li> <li>Responsible management: Reducing financed emissions</li> </ul>
<b>Risk management</b>		
<ul style="list-style-type: none"> <li>Disclose how the organisation identifies, assesses, and manages climate-related risks</li> </ul>	<p>A cross-risk-type materiality analysis for climate-related and biodiversity risks that considers both transition and physical risks confirms our classification that climate-related and biodiversity risks should not be considered separate risk types, but rather horizontal material risks. The individual risk assessment for lending also includes scenario and risk analyses of impact and resilience with regard to climate-related and biodiversity risks.</p>	<ul style="list-style-type: none"> <li>Responsible management: Managing environmental risks</li> <li>Responsible management: Understanding biodiversity risks</li> </ul>

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Recommendation	Statement	Reference
<b>Metrics and targets</b> <ul style="list-style-type: none"> <li>Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities, where such information is material</li> </ul>	<p>By 2050, we aim to reduce the CO<sub>2</sub> emissions from our entire lending and investment portfolio to net zero using science-based CO<sub>2</sub> reduction targets from the Science Based Targets initiative (SBTi). As part of these efforts, we published our portfolio intensities in emissions-intensive sectors for the first time in 2022 and had them validated by SBTi. We want to reduce the CO<sub>2</sub> emissions of our own banking operations to net zero as early as 2040 and we expect climate neutrality from our suppliers by 2040. We aim to mobilise €300bn for sustainable financial products by 2025 and have already achieved €238bn of this amount.</p>	<ul style="list-style-type: none"> <li>Anchoring sustainability in our strategy: Pursuing net zero target</li> <li>Responsible management: Reducing financed emissions</li> <li>Supporting the customer transformation: Sustainable financing</li> <li>Leading by example: Reducing operational emissions</li> </ul>



## TNFD recommendations in the non-financial report

Recommendation	Statement	Reference
<b>Governance</b>		
<ul style="list-style-type: none"> <li>Disclosure of the organisation's governance with regard to nature-related dependencies, impacts, risks and opportunities</li> </ul>	Commerzbank has adopted a holistic approach to sustainability governance (see "TCFD recommendations in the non-financial report") that also takes into account nature-related dependencies, impacts, risks and opportunities. This governance is supplemented by an external advisory board that provides valuable input on the topic of biodiversity, among other things.	<ul style="list-style-type: none"> <li>Anchoring sustainability in our strategy: Governance structure consolidated</li> <li>Anchoring sustainability in our strategy: Key issues analysed</li> <li>Responsible management: Evaluating environmental and social risks</li> <li>Leading by example: Managing compliance risks</li> </ul>
<b>Strategy</b>		
<ul style="list-style-type: none"> <li>Disclosure of nature-related dependencies, impacts, risks and opportunities on the organisation's business model, strategy and financial planning, where such information is material</li> </ul>	In order to reduce our impact on nature, we have been integrating appropriate exclusion criteria into our core business for many years. We also classify the nature-related application of funds in the ESG framework as sustainable financing with a view to supporting corresponding lending opportunities. The protection of biodiversity therefore plays a crucial role achieving our goal of mobilising €300bn for sustainable financial products. As part of a new risk and impact analysis, expanded to include an initial scenario analysis, we have determined the key sectors in the loan portfolio with nature-related risks and impacts. The main drivers of risks and negative impacts have also been identified. The protection of biodiversity is likewise taken into account in our own banking operations as part of the integrated environmental and energy management system and with respect to measures aimed at optimising the consumption of resources.	<ul style="list-style-type: none"> <li>Anchoring sustainability in our strategy: Key issues analysed</li> <li>Anchoring sustainability in our strategy: Pursuing net zero target</li> <li>Responsible management: Recognising impacts on biodiversity</li> <li>Responsible management: Understanding biodiversity risks</li> <li>Responsible management: Analysis of biodiversity risk in credit risk</li> <li>Supporting the customer transformation: Sustainable financing</li> <li>Leading by example: Reducing operational emissions</li> </ul>
<b>Risk and impact management</b>		
<ul style="list-style-type: none"> <li>Description of the process used by the organisation to identify, assess, prioritise and monitor nature-related dependencies, impacts, risks and opportunities</li> </ul>	As part of a new materiality analysis in 2022, the topic of diversity was identified as material and incorporated into the annual Bank-wide strategy process. The topic is therefore increasingly being pursued at a strategic level and shifting into the focus of sustainability management. The analysis of nature-related risks and impacts incorporated two TNFD scenario narratives and was carried out using the "ENCORE" tool. On the basis of the results, we identified potential areas of action and strategic priorities and will develop further analyses and measures to protect biodiversity. Biodiversity has additionally been classified as essential for our own banking operations and is taken into account accordingly.	<ul style="list-style-type: none"> <li>Responsible management: Making our stance clear</li> <li>Responsible management: Recognising impacts on biodiversity</li> <li>Responsible management: Understanding biodiversity risks</li> <li>Supporting the customer transformation: Sustainable financing</li> <li>Leading by example: Reducing operational emissions</li> </ul> <p>Other sources and reports:</p> <ul style="list-style-type: none"> <li>Disclosure report in accordance with CRR</li> </ul>
<b>Metrics and targets</b>		
<ul style="list-style-type: none"> <li>Disclosure of the metrics and targets used to assess and manage key nature-related dependencies, risks and opportunities</li> </ul>	The results of the risk and impact analysis form the basis for defining strategic measures. For this reason, we are striving for improved quantification of biodiversity going forward in order to make it easier to manage the overall process and define strategic goals more effectively. Commerzbank has identified a potential of €300bn in sustainable financial products by 2025 across all ESG aspects. This includes financing with a positive effect on	<ul style="list-style-type: none"> <li>Responsible management: Recognising impacts on biodiversity</li> <li>Responsible management: Understanding biodiversity risks</li> <li>Responsible management: Evaluating environmental and social risks</li> <li>Anchoring sustainability in our strategy: Pursuing net zero target</li> </ul> <p>Other sources and reports:</p>

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Recommendation	Statement	Reference
	biological diversity. On the issue of deforestation, we have formulated a concrete target by 2025 that we would like to achieve through active dialogue with customers.	<ul style="list-style-type: none"><li>• Disclosure report in accordance with CRR</li></ul>

## Progress report “Principles for Responsible Banking”

The progress report on the Principles for Responsible Banking (PRB) of the United Nations Environmental Programme Financial Initiative (UNEP-FI) is integrated into this non-financial report in the form of a tabular index. Reference is made to further details within this non-financial report and to supplementary documents.

### Principle 1: Alignment



We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

#### 1.1 Business model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

Commerzbank is the leading bank for SMEs (the Mittelstand) and a partner to some 25,500 corporate client groups and almost 11 million private and small-business customers in Germany. The Bank offers a comprehensive portfolio of financial services in two business segments – Private and Small-Business Customers and Corporate Clients.

Annual report

- Basis of the Commerzbank Group: Structure and organisation
- Economic report: Financial performance, assets, liabilities and financial position

#### 1.2 Strategy alignment

**Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?**

☒ Yes

☐ No

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

**Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?**

☒ UN Guiding Principles on Business and Human Rights

☒ International Labour Organization fundamental conventions

☒ UN Global Compact

☐ UN Declaration on the Rights of Indigenous Peoples

☒ Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: TCFD, TNFD and non-financial report (CSR-RUG)

☒ Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: regulatory requirements, positions and guidelines can be found in our ESG framework

☐ None of the above

We align our actions with ethical values such as integrity and responsibility. We are committed to respecting human rights and explain this in detail in our Position on Human Rights.

The transformation into a sustainable economy affects us all. We aim to shape this change in a proactive manner. Sustainability has been an integral part of our corporate strategy since as far back as 2020.

Climate-related risks are among the greatest challenges of our time. As a Bank, we consider it our obligation to review the impact of our financing and to manage our portfolios in accordance with the Paris climate target. We have joined the Science Based Targets initiative (SBTi), the Net-Zero Banking Alliance and the Task Force on Climate-related Financial Disclosures (TCFD), among others.

By joining the Taskforce on Nature-related Financial Disclosures (TNFD) in 2023, we have underlined our resolve to make an active contribution to preserving biodiversity.

Through our ESG framework, we provide our stakeholders with the greatest possible transparency regarding our understanding of sustainability. We create a Bank-wide standard that enables stringent management of all relevant products, processes and activities and ensures the sustainable transformation of Commerzbank.

Non-financial report

- Taking responsibility
- Supporting the customer transformation: Sustainable financing
- Supporting the customer transformation: Sustainable investments and capital market products

Other sources and reports

- Page on the sustainability portal: Memberships and initiatives
- Commerzbank's human rights position
- ESG framework

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## Principle 2: Impact and Target Setting



We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

### 2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly<sup>5</sup> and fulfil the following requirements/elements (a-d)<sup>6</sup>:

**a) Scope:** What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

#### Materiality analysis

As part of the materiality analysis for 2022, we identified the topic areas that are most relevant to us. A list of potential sustainability topics was analysed along two materiality perspectives – the “impact perspective” and the “business perspective”. To measure the impact perspective, we conducted an exposure analysis to reveal “sustainability hotspots”. These are in countries and sectors where Commerzbank is particularly active, and where sustainability indicators in the defined areas are significantly below average. The business perspective – i.e. the question of how high the opportunities and risks of these sustainability issues are for business success – was established in a management workshop.

#### Sustainable portfolio management using the SBTi method

We have set ourselves the strategic goal of reducing the carbon footprint of the Bank's entire loan and investment portfolio to net zero by no later than 2050. We take a holistic approach to our net zero commitment and manage sustainability across all relevant areas of the Bank. To make this approach transparent, we have joined the SBTi and manage our defined portfolios with a particular focus on the emission-intensive sectors.

#### Non-financial report

- Anchoring sustainability in our strategy:  
Key issues analysed
- Responsible management:  
Reducing financed emissions
- Other sources and reports
- ESG framework

**b) Portfolio composition:** Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

- by sectors & industries<sup>7</sup> for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
- by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

#### Sustainable portfolio management using the SBTi method

Using the SBTi methodology, the Bank identified the CO<sub>2</sub>-intensive sectors within its overall portfolio, determined the level of CO<sub>2</sub> pollution associated with these sub-portfolios and calculated concrete sector-specific reduction targets that are in line with the goals of the Paris Agreement. Our focus is on those areas of the value chain where high CO<sub>2</sub> emissions are generated or which cause high downstream CO<sub>2</sub> emissions. Accordingly, when setting the SBTi targets, we took into account the following segments of the value chain that are currently classified as especially emissions-intensive: power generation, aviation, automotive manufacturing, commercial real estate financing, and the production of cement, iron and steel. We will likewise consider the retail mortgage financing portfolio, which is deemed optional in the SBTi analysis.

The composition of the reduction pathways and portfolio targets under the SBTi method are published in the ESG framework. Further information on the portfolio breakdown can also be found in this non-financial report in the chapter “Reducing financed emissions” and in our disclosure report in accordance with CRR.

#### Non-financial report

- Responsible management:  
Reducing financed emissions
- Other sources and reports
- CRR Report Annex 4
- ESG framework

**c) Context:** What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?<sup>8</sup> Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

*This step aims to put your bank's portfolio impacts into the context of society's needs.*

<sup>5</sup> That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

<sup>6</sup> Further guidance can be found in the Interactive Guidance on impact analysis and target setting.

<sup>7</sup> Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here

<sup>8</sup> Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

<p><b>Materiality analysis</b></p> <p>Nine topics were identified as material as part of the materiality analysis. These topics relate to all three sustainability dimensions – environmental, social and governance – and currently form the focus of our sustainability management activities. Climate change continues to have the highest relevance for the Bank. At the same time, topics such as biodiversity and circular solutions have shifted into greater focus than in previous materiality analyses.</p> <p><b>Materiality analysis for environmental risks</b></p> <p>At Commerzbank, we do not consider climate-related risks as a separate type of risk, but as a horizontal risk. This can materialise across the different known types of risk such as credit risk or market risk. The materiality analysis for environmental risks is carried out on a comprehensive basis across all risk types. In 2023, the analysis encompassed an assessment of all risk types that had been classified as material in the risk inventory in terms of factors such as the materiality of their impact in relation to climate-related risks. We provide a transparent overview of the results of the materiality analysis in the “Managing environmental risks” section of this non-financial report (page 57 ff.).</p> <p><b>Biodiversity-specific impact analysis using “ENCORE”</b></p> <p>In 2023, we carried out a second biodiversity-specific impact analysis, revised and expanded compared to the previous year, using the “ENCORE” tool. ENCORE provides a science-based link between economic activities and biodiversity-damaging impacts. In our analysis, we compared the business volume of the sectors we finance with the tool’s external data. This allowed us to identify potential areas of action and strategic priorities and, building on this, to develop further analyses and measures to protect biodiversity. We provide a transparent overview of the results of the biodiversity-specific impact analysis in the “Evaluating environmental and social risks” section of this non-financial report (page 50 ff.).</p>	<p>Non-financial report</p> <ul style="list-style-type: none"> <li>• Anchoring sustainability in our strategy: Key issues analysed</li> <li>• Responsible management: Evaluating environmental and social risks</li> <li>• Responsible management: Reducing financed emissions</li> <li>• Responsible management: Managing environmental risks</li> </ul> <p>Other sources and reports</p> <ul style="list-style-type: none"> <li>• CRR Report Annex 4</li> <li>• ESG framework</li> </ul>
<p>Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)<sup>9</sup>? Please disclose.</p>	
<p><b>Materiality analysis</b></p> <p>Nine topics were identified as material as part of the materiality analysis. These are recorded in the results matrix for the materiality analysis in this non-financial report (page 47).</p> <p>The sustainability strategy is grounded in our commitment to combating climate change. In addition, we tackle issues that are moving into the focus of the sustainability debate, such as biodiversity protection. These two topics represent prioritised impact areas.</p>	<p>Non-financial report</p> <ul style="list-style-type: none"> <li>• Anchoring sustainability in our strategy: Key issues analysed</li> </ul>
<p><b>d)</b> For these (min. two prioritized impact areas): <b>Performance measurement:</b> Has your bank identified which sectors &amp; industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank’s context.</p> <p>In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank’s current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank’s activities and provision of products and services. If you have identified climate and/or financial health&amp;inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.</p> <p>If your bank has taken another approach to assess the intensity of impact resulting from the bank’s activities and provision of products and services, please describe this.</p> <p><i>The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.</i></p>	
<p>The transformation into a sustainable economy affects us all. We aim to shape this change in a proactive manner. We want to make our contribution to aligning global financial flows with the goals of the Paris Agreement and the EU Green Deal, and consequently promote climate-compatible development.</p> <p><b>Materiality analysis</b></p> <p>To apply the materiality analysis and the identified impact areas in the Bank’s operations, the results were incorporated into the Bank-wide strategy process and discussed at the level of the Board of Managing Directors.</p> <p><b>Sustainable portfolio management using the SBTi method</b></p> <p>The portfolio targets are published in our ESG framework where they, along with the status of target achievement, are updated on a regular basis. The “Reduction targets under the Sectoral Decarbonization Approach (SDA)” table in this non-financial report (page 53) shows the CO<sub>2</sub> reduction pathways we have defined from here until 2030 by sector. The percentage reductions derive from the applicable emission intensity for the baseline year 2021 and the targets for 2030.</p>	<p>Non-financial report</p> <ul style="list-style-type: none"> <li>• Anchoring sustainability in our strategy: Key issues analysed</li> <li>• Responsible management: Reducing financed emissions</li> </ul> <p>Other sources and reports</p> <ul style="list-style-type: none"> <li>• ESG framework</li> </ul>

<sup>9</sup> To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.

25	Declaration on corporate governance pursuant to Art. 315d in conjunction with Art. 289f of the German Commercial Code (HGB)
36	Details pursuant to Art. 315 of the German Commercial Code (HGB)
42	Non-financial report

### Self-assessment summary

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?<sup>10</sup>

Scope:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Portfolio composition:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Context:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Performance measurement:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

Climate change mitigation, climate change adaptation, resource efficiency & circular economy, biodiversity, human rights, gender equality, decent employment (see also the results matrix of the materiality analysis)

How recent is the data used for and disclosed in the impact analysis?

- ☐ Up to 6 months prior to publication
- ☐ Up to 12 months prior to publication
- ☐ Up to 18 months prior to publication
- ☒ Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: (optional)

## 2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets<sup>11</sup> have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

**a) Alignment:** Which international, regional or national policy frameworks to align your bank's portfolio with<sup>12</sup> have you identified as relevant?

Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

*You can build upon the context items under 2.1.*

Sustainability has been an integral part of our corporate strategy since as far back as 2020. We want to make our contribution to aligning global financial flows with the goals of the Paris Agreement and the EU Green Deal, and consequently promote climate-compatible development.

### Climate protection (net zero targets)

Our net zero commitment is at the heart of the sustainability strategy adopted by the Board of Managing Directors. It is based on two pillars: We support our customers in their sustainable transformations and set a good example ourselves. We are committed to reducing all of our financed emissions to net zero, mobilising €300bn for sustainable products and achieving the net-zero standard in our banking operations. For this purpose, we have joined the Science Based Targets initiative (SBTi), the Net-Zero Banking Alliance and the Task Force on Climate-related Financial Disclosures (TCFD), among others.

### Biodiversity

We are also keenly aware of the relevance of biodiversity, as evidenced by our affiliation with the "Biodiversity in Good Company" Initiative (BiGCI) and the Taskforce on Nature-related Financial Disclosures (TNFD). In December 2023, we adopted a target on deforestation that sets specific requirements for our customers in sectors and regions relevant to deforestation.

### Women in management positions

In addition to the two topics of climate protection and biodiversity, we also focus on the social aspect of sustainability – analogous to the topics identified in the materiality analysis.

As a founding member of the Diversity Charter and a signatory to the UN Women Empowerment Principles, we are committed to equality within our organisation. Commerzbank intends to increase the proportion of women in management positions. To this end, our Board of Managing Directors has set a new and ambitious target of 40% across all management levels by the end of 2030.

### Non-financial report

- Anchoring sustainability in our strategy
- Anchoring sustainability in our strategy:  
Pursuing net zero target
- Responsible management:  
Evaluating environmental and social risks
- Responsible management:  
Reducing financed emissions
- Responsible management:  
Managing environmental risks
- Leading by example: Promoting diversity and equal opportunities

**b) Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

*You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.*

<sup>10</sup> You can respond "Yes" to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.

<sup>11</sup> Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

<sup>12</sup> Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.



A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

Impact area	Indicator	Response
Climate protection	A.1.2	KPI 1: Net-zero CO <sub>2</sub> emissions in the loan and investment portfolio by 2050
	A.3.1	KPI 2: €300bn for sustainable products by 2025
	n.a.	KPI 3: Net-zero CO <sub>2</sub> emissions in banking operations by 2040
Impact area	Indicator	Response
Biodiversity	n.a.	Deforestation target
Impact area	Indicator	Response
Women in management positions	n.a.	40% across all management levels

#### Non-financial report

- Anchoring sustainability in our strategy:  
Pursuing net zero target
- Responsible management:  
Evaluating environmental and social risks
- Responsible management:  
Reducing financed emissions
- Responsible management:  
Managing environmental risks
- Leading by example: Promoting diversity and equal opportunities

**c) SMART target:** (incl. key performance indicators (KPIs)<sup>13</sup>): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.

#### Climate protection (net zero targets)

KPI 1: Net-zero CO<sub>2</sub> emissions in the loan and investment portfolio by 2050

KPI 2: €300bn for sustainable products by 2025

KPI 3: Net-zero CO<sub>2</sub> emissions in banking operations by 2040

#### Biodiversity

To minimise deforestation in our customer portfolio, corporate customers that are active in sectors (forestry, soy, palm oil, beef) and regions relevant to deforestation must demonstrate their commitment to combating deforestation through relevant memberships (RSPO, GRSB) or certifications (FSC or PEFC, RTRS, RSPO) by the end of 2025 at the latest. We continually examine other relevant memberships and certificates and will take these into account if the level of ambition and acceptance are comparable.

#### Women in management positions

40% women in management positions across all management levels (management levels 1 to 4 and project managers at level 5) by 2030.

#### Non-financial report

- Anchoring sustainability in our strategy:  
Pursuing net zero target
- Responsible management:  
Evaluating environmental and social risks
- Responsible management:  
Recognising impacts on biodiversity
- Responsible management:  
Reducing financed emissions
- Responsible management:  
Managing environmental risks
- Leading by example: Promoting diversity and equal opportunities

**d) Action plan:** Which actions including milestones have you defined to meet the set targets? Please describe.

Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

The Group Sustainability Management department takes the lead in coordinating and developing the Bank's sustainability activities. This central sustainability function reports to the Chairman of the Board of Managing Directors and regularly informs him about progress on sustainability issues and activities. Our sustainability strategy is implemented through the overarching strategic initiative Sustainability 360°.

#### Non-financial report

- Taking responsibility
- Anchoring sustainability in our strategy:  
Governance structures consolidated

<sup>13</sup> Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

- 25 Declaration on corporate governance  
pursuant to Art. 315d in conjunction with  
Art. 289f of the German Commercial Code (HGB)
- 36 Details pursuant to Art. 315 of the German Commercial Code (HGB)
- 42 Non-financial report

### Self-assessment summary

Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...

	... first area of most significant impact:	... second area of most significant impact:	... third area of impact:
Alignment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No
Baseline	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No
SMART targets	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No
Action plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No

## 2.3 Target implementation and monitoring (Key Step 3)

### For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

**Or, in case of changes to implementation plans (relevant for 2<sup>nd</sup> and subsequent reports only):** describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

### Climate protection (net zero targets)

KPI 1: The portfolio targets are published in our ESG framework where they, along with the status of target achievement, are updated on a regular basis.

KPI 2: By the end of 2023, Commerzbank Aktiengesellschaft had mobilised €238bn for sustainable financial products, out of a target of €300bn by the end of 2025.

KPI 3: In 2023, Commerzbank Aktiengesellschaft generated a total of 76,591 tonnes of CO<sub>2</sub>-equivalent emissions. We already achieved our interim goal (30% reduction in greenhouse gas emissions by 2025, starting from base year 2018) in 2022, with CO<sub>2</sub> emissions of 78,402 tonnes (decrease of 34.9%).

### Biodiversity

We adopted our target on deforestation in December 2023.

### Women in management positions

At the end of 2023, 36.1% of management positions across the Group were held by women.

### Non-financial report

- Anchoring sustainability in our strategy:  
Pursuing net zero target
- Responsible management:  
Reducing financed emissions
- Responsible management:  
Managing environmental risks
- Leading by example: Promoting diversity and equal opportunities

### Other sources and reports

- ESG framework

### Principle 3: Clients and Customers



We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

#### 3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers<sup>14</sup> in place to encourage sustainable practices?

☒ Yes ☐ In progress ☐ No

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

☒ Yes ☐ In progress ☐ No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities<sup>15</sup>. It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

*This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).*

Global efforts to combat climate change require not only favourable political conditions and new technologies, but also adequate financial resources above all.

We will therefore mobilise €300bn for sustainable financial products by 2025. At the same time, the financing of green technologies and business ideas that could mitigate climate change also makes a concrete contribution towards the successful transition to a low-carbon, sustainable future economy.

Non-financial report

- Anchoring sustainability in our strategy:  
Pursuing net zero target
- Supporting the customer transformation:  
Sustainable financing
- Supporting the customer transformation: Sustainable investments and capital market products

#### 3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

In order to drive forward sustainable transformation and support our customers in their transformation, we develop sustainable products that take into account regulatory requirements, market analyses and the Bank's own specialist and product expertise. These products support our customers in their sustainable transformation and at the same time provide incentives for companies and private individuals to become more sustainable.

The sustainable products in the Private and Small-Business Customers segment include green mortgage loans, KfW programmes and sustainable asset management.

The sustainable products in the Corporate Clients segment include the financing of green infrastructure, sustainable bonds, and ESG/sustainability-linked loans and promissory note loans. We publish details about our sustainable products in our ESG framework and in the "Supporting the customer transformation" section of this non-financial report.

Non-financial report

- Supporting the customer transformation:  
Sustainable financing
- Supporting the customer transformation: Sustainable investments and capital market products

Other sources and reports

- ESG framework

<sup>14</sup> A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

<sup>15</sup> Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

- 25 Declaration on corporate governance  
pursuant to Art. 315d in conjunction with  
Art. 289f of the German Commercial Code (HGB)
- 36 Details pursuant to Art. 315 of the German Commercial Code (HGB)
- 42 Non-financial report

## Principle 4: Stakeholders



We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

### 4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups <sup>16</sup>) you have identified as relevant in relation to the impact analysis and target setting process?

☒ Yes ☐ In progress ☐ No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Corporate responsibility also means seeking regular dialogue with external and internal stakeholders. Commerzbank pursues an active and transparent dialogue with a view to satisfying the expectations and needs of its stakeholders, taking account of them in its corporate strategy and setting out its own perspective.

We are in dialogue with the following stakeholder groups in particular:

- Shareholders and investors
- Research/academia
- Customers
- Suppliers
- Media
- Employees
- Competitors/financial sector
- Non-governmental organisations (NGOs)
- Politics
- Civil society

Commerzbank maintains relationships with numerous organisations and groups which approach the company with requests, demands or suggestions. We prioritise dialogue with stakeholder groups which have a perceptible impact on Commerzbank's economic, environmental or social performance or are heavily affected by it.

The discourse on important questions relating to social, economic and financial policy is of great importance to us.

To promote a constructive and critical dialogue with our stakeholders, we have also founded an external Sustainability Advisory Board. The experts from the fields of politics, academia, society, NGOs, trade unions, and small and SMEs represent a broad spectrum of content and provide impetus for further development of our sustainability strategy.

A detailed run-down of our dialogue with interest groups can be found in our Sustainability Report (GRI Report).

Non-financial report

- Anchoring sustainability in our strategy:  
Governance structures consolidated

- Anchoring sustainability in our strategy:  
Key issues analysed

Other sources and reports

- Sustainability Report (GRI 2-29)

<sup>16</sup> Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations.

## Principle 5: Governance & Culture



We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

### 5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

☒ Yes ☐ In progress ☐ No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Sustainability is deeply anchored in our governance structure. In the “Governance structures consolidated” section of this non-financial report, we provide a detailed run-down of our corporate governance structures with regard to sustainability.

Non-financial report

- Anchoring sustainability in our strategy:  
Governance structures consolidated

### 5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

The corporate values– integrity, performance and responsibility – form the basis of our corporate culture. Our Code of Conduct goes beyond legal and regulatory requirements and sets standards for Commerzbank Group employees.

Our human resources policy makes it possible to promote the development of each individual employee as well as collegial cooperation overall at Commerzbank. For example, Commerzbank actively supports its employees in their personal development and provides targeted offerings to that end. We also offer our employees a wide range of information and advice on health-related topics and provide financial support within the scope of our occupational healthcare management.

The Bank additionally offers a “Basic Sustainability Qualification” that enables employees to gain an even more comprehensive understanding of the topic of sustainability. For sales and sales-related functions, Commerzbank offers a detailed advanced qualification programme to ensure that it has the requisite professional expertise on this important topic.

Further details about the company culture can be found in our Sustainability Report (GRI Report) and on our sustainability portal.

Non-financial report

- Anchoring sustainability in our strategy:  
Governance structures consolidated
- Leading by example: Embodying collegiality
- Leading by example:  
Ensuring integrity and compliance

Other sources and reports

- Sustainability Report (GRI 401-407)
- Page on the sustainability portal: Employees

### 5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?<sup>17</sup> Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

Through our ESG framework, we provide our stakeholders with the greatest possible transparency regarding our understanding of sustainability. We create a Bank-wide standard that enables stringent management of all relevant products, processes and activities and ensures the sustainable transformation of Commerzbank.

Non-financial report

- Anchoring sustainability in our strategy:  
Key issues analysed
- Responsible management:  
Managing environmental risks
- Responsible management:  
Evaluating environmental and social risks

Other sources and reports

- ESG framework

<sup>17</sup> Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

25 Declaration on corporate governance

pursuant to Art. 315d in conjunction with

Art. 289f of the German Commercial Code (HGB)

36 Details pursuant to Art. 315 of the German Commercial Code (HGB)

42 Non-financial report

**Self-assessment summary**

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

☒ Yes☐ No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

☒ Yes☐ No

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

☒ Yes☐ In progress☐ No



## Principle 6: Transparency & Accountability



We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

### 6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

☐ Yes ☒ Partially ☐ No

If applicable, please include the link or description of the assurance statement.

The information in this progress report on the Principles for Responsible Banking was reviewed by the auditing firm KPMG as part of the audit (limited assurance engagement) of the non-financial report.

Annual report

- Further Information: Report on the audit of the non-financial report

### 6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- ☒ GRI  
☒ SASB  
☒ CDP  
☐ IFRS Sustainability Disclosure Standards (to be published)  
☒ TCFD  
☒ Other: ESG-Framework, TNFD

Commerzbank provides regular and comprehensive information on the progress it has made on the Bank's sustainable orientation. We use various reporting formats for this purpose.

Other sources and reports

- ESG framework
- Sustainability report (GRI)
- Page on the sustainability portal: Memberships and initiatives

### 6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis<sup>18</sup>, target setting<sup>19</sup> and governance structure for implementing the PRB)? Please describe briefly.

In accordance with the requirements of the EU Corporate Sustainability Reporting Directive (CSRD) passed this year, we carried out a new materiality analysis in mid-2023, which will have a decisive influence on the next 12-month reporting period.

Non-financial report

- Anchoring sustainability in our strategy:  
Key issues analysed

### 6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

- |  |  |
|--|--|
| <input type="checkbox"/> Embedding PRB oversight into governance                               | <input type="checkbox"/> Customer engagement             |
| <input type="checkbox"/> Gaining or maintaining momentum in the bank                           | <input type="checkbox"/> Stakeholder engagement          |
| <input type="checkbox"/> Getting started: where to start and what to focus on in the beginning | <input checked="" type="checkbox"/> Data availability    |
| <input checked="" type="checkbox"/> Conducting an impact analysis                              | <input type="checkbox"/> Data quality                    |
| <input type="checkbox"/> Assessing negative environmental and social impacts                   | <input type="checkbox"/> Access to resources             |
| <input type="checkbox"/> Choosing the right performance measurement methodology/ies            | <input checked="" type="checkbox"/> Reporting            |
| <input type="checkbox"/> Setting targets   | <input checked="" type="checkbox"/> Assurance            |
| <input type="checkbox"/> Other: ...  | <input type="checkbox"/> Prioritizing actions internally |

<sup>18</sup> For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

<sup>19</sup> For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.



	a	b	c	d	e	f	g	h	i	j
Disclosure reference date T										
Based on the Turnover KPI			Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
million €	Total [gross] carrying amount			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
<b>33 Financial and Non-financial undertakings</b>	<b>182,021</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	112,870	X	X	X	X	X	X	X	X	X
35 Loans and advances	77,823	X	X	X	X	X	X	X	X	X
36 of which loans collateralised by commercial immovable property	9,181	X	X	X	X	X	X	X	X	X
37 of which building renovation loans	340	X	X	X	X	X	X	X	X	X
38 Debt securities	34,448	X	X	X	X	X	X	X	X	X
39 Equity instruments	599	X	X	X	X	X	X	X	X	X
40 Non-EU country counterparties not subject to NFRD disclosure obligations	69,150	X	X	X	X	X	X	X	X	X
41 Loans and advances	50,970	X	X	X	X	X	X	X	X	X
42 Debt securities	18,061	X	X	X	X	X	X	X	X	X
43 Equity instruments	120	X	X	X	X	X	X	X	X	X
<b>44 Derivatives</b>	<b>1,497</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>45 On demand interbank loans</b>	<b>131</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>46 Cash and cash-related assets</b>	<b>1,108</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
47 Other categories of assets (e.g. Goodwill, commodities etc.)	10,257	X	X	X	X	X	X	X	X	X
<b>48 Total GAR assets</b>	<b>372,436</b>	<b>130,733</b>	<b>8,713</b>	<b>8,488</b>	<b>29</b>	<b>159</b>	<b>11</b>	<b>8</b>		<b>0</b>
<b>49 Assets not covered for GAR calculation</b>	<b>165,522</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
50 Central governments and Supranational issuers	37,568	X	X	X	X	X	X	X	X	X
51 Central banks exposure	101,396	X	X	X	X	X	X	X	X	X
52 Trading book	26,559	X	X	X	X	X	X	X	X	X
<b>53 Total assets</b>	<b>537,959</b>	<b>130,733</b>	<b>8,713</b>	<b>8,488</b>	<b>29</b>	<b>159</b>	<b>11</b>	<b>8</b>		<b>0</b>
<b>Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations</b>										
54 Financial guarantees	3,093	36	1		0	1				
55 Assets under management	46,194	20,809	2,700		2	117	5	1		0
56 Of which debt securities	38,613	20,418	2,573		1	38	4	1		0
57 Of which equity instruments	4,910	392	127		1	79	1	0		0

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

- 25 Declaration on corporate governance pursuant to Art. 315d in conjunction with Art. 289f of the German Commercial Code (HGB)
- 36 Details pursuant to Art. 315 of the German Commercial Code (HGB)
- 42 Non-financial report

	ab	ac	ad	ae	af
<b>Disclosure reference date T</b>					
<b>Based on the Turnover KPI</b>	<b>TOTAL (CCM + CCA)</b>				
	<b>Of which towards taxonomy relevant sectors (Taxonomy-eligible)</b>				
		<b>Of which environmentally sustainable (Taxonomy-aligned)</b>			
<b>million €</b>			<b>Of which Use of Proceeds</b>	<b>Of which transitional</b>	<b>Of which enabling</b>
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	130,744	8,721	8,488	29	159
<b>2 Financial undertakings</b>	<b>3,963</b>	<b>58</b>	<b>58</b>		<b>0</b>
3 Credit institutions	2,883				
4 Loans and advances	1,608				
5 Debt securities, including UoP <sup>1)</sup>	1,274				
6 Equity instruments			X		
7 Other financial corporations	1,081	58	58		0
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including UoP <sup>1)</sup>					
11 Equity instruments			X		
12 of which management companies	155				
13 Loans and advances	155				
14 Debt securities, including UoP <sup>1)</sup>					
15 Equity instruments			X		
16 of which insurance undertakings	4				
17 Loans and advances	4				
18 Debt securities, including UoP <sup>1)</sup>					
19 Equity instruments			X		
<b>20 Non-financial undertakings</b>	<b>12,881</b>	<b>3,225</b>	<b>2,991</b>	<b>29</b>	<b>159</b>
21 Loans and advances	12,586	3,183	2,991	22	145
22 Debt securities, including UoP <sup>1)</sup>	295	42		7	14
23 Equity instruments			X		
<b>24 Households</b>	<b>113,883</b>	<b>5,438</b>	<b>5,438</b>		
25 of which loans collateralised by commercial immovable property <sup>2)</sup>	103,857	4,673	4,673		
26 of which building renovation loans	3,758				
27 of which motor vehicle loans	98				
<b>28 Local governments financing</b>	<b>17</b>				
29 Housing financing					
30 Other local government financing	17				
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>					
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
<b>33 Financial and Non-financial undertakings</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
34 Loans and advances	X	X	X	X	X
35 of which loans collateralised by commercial immovable property	X	X	X	X	X
36 of which building renovation loans	X	X	X	X	X
37 Debt securities	X	X	X	X	X
38 Equity instruments	X	X	X	X	X
Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
40 Loans and advances	X	X	X	X	X
41 Debt securities	X	X	X	X	X
42 Equity instruments	X	X	X	X	X
<b>44 Derivatives</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>45 On demand interbank loans</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>46 Cash and cash-related assets</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>

	ab	ac	ad	ae	af
Disclosure reference date T					
Based on the Turnover KPI		TOTAL (CCM + CCA)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)			
million €			Of which Use of Proceeds	Of which transitional	Of which enabling
Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X
47 Total GAR assets	130,744	8,721	8,488	29	159
49 Assets not covered for GAR calculation	X	X	X	X	X
50 Central governments and Supranational issuers	X	X	X	X	X
51 Central banks exposure	X	X	X	X	X
52 Trading book	X	X	X	X	X
53 Total assets	130,744	8,721	8,488	29	159
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations					
54 Financial guarantees	36	1		0	1
55 Assets under management	20,814	2,701		2	117
56 Of which debt securities	20,422	2,574		2	38
57 Of which equity instruments	392	127		1	79

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.





	ag	ah	ai	aj	ak	al	am	an	ao	ap
Disclosure reference date T-1										
Based on the Turnover KPI	million €	Total [gross] carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transi- tional	Of which enabling		Of which Use of Proceeds	Of which enabling	
31	Collateral obtained by taking possession: residential and commercial immovable properties									
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)									
33	Financial and Non-financial undertakings	X	X	X	X	X	X	X	X	X
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X	X
35	Loans and advances	X	X	X	X	X	X	X	X	X
36	of which loans collateralised by commercial immovable property	X	X	X	X	X	X	X	X	X
37	of which building renovation loans	X	X	X	X	X	X	X	X	X
38	Debt securities	X	X	X	X	X	X	X	X	X
39	Equity instruments	X	X	X	X	X	X	X	X	X
40	Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X	X
41	Loans and advances	X	X	X	X	X	X	X	X	X
42	Debt securities	X	X	X	X	X	X	X	X	X
43	Equity instruments	X	X	X	X	X	X	X	X	X
44	Derivatives	X	X	X	X	X	X	X	X	X
45	On demand interbank loans	X	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	X	X	X	X	X	X	X	X	X
47	Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X		X	X	X	X	X
48	Total GAR assets									
49	Assets not covered for GAR calculation	X	X	X	X	X	X	X	X	X
50	Central governments and Supranational issuers	X	X	X	X	X	X	X	X	X
51	Central banks exposure	X	X	X	X	X	X	X	X	X
52	Trading book	X	X	X	X	X	X	X	X	X
53	Total assets									
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations										
54	Financial guarantees									
55	Assets under management									
56	Of which debt securities									
57	Of which equity instruments									

<sup>1)</sup> UoP (Use of Proceeds) bezeichnet Risikopositionen, bei denen die Verwendung der Erlöse durch den Kreditnehmer / Emittenten bekannt ist.

<sup>2)</sup> In Zeile 25 werden nur immobilienbesicherte Kredite mit regulatorisch anrechenbaren Sicherheiten ausgewiesen.

- 25 Declaration on corporate governance  
pursuant to Art. 315d in conjunction with  
Art. 289f of the German Commercial Code (HGB)
- 36 Details pursuant to Art. 315 of the German Commercial Code (HGB)
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	bg	bh	bi	bj	bk
<b>Disclosure reference date T-1</b>					
<b>Based on the Turnover KPI</b>	<b>TOTAL (CCM + CCA)</b>				
	<b>Of which towards taxonomy relevant sectors (Taxonomy-eligible)</b>				
	<b>Of which environmentally sustainable (Taxonomy-aligned)</b>				
<b>million €</b>			<b>Of which Use of Proceeds</b>	<b>Of which transi-tional</b>	<b>Of which enabling</b>
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation					
<b>2 Financial undertakings</b>					
3 Credit institutions					
4 Loans and advances					
5 Debt securities, including UoP <sup>1)</sup>					
6 Equity instruments			X		
7 Other financial corporations					
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including UoP <sup>1)</sup>					
11 Equity instruments			X		
12 of which management companies					
13 Loans and advances					
14 Debt securities, including UoP <sup>1)</sup>					
15 Equity instruments			X		
16 of which insurance undertakings					
17 Loans and advances					
18 Debt securities, including UoP <sup>1)</sup>					
19 Equity instruments			X		
<b>20 Non-financial undertakings</b>					
21 Loans and advances					
22 Debt securities, including UoP <sup>1)</sup>					
23 Equity instruments			X		
<b>24 Households</b>					
25 of which loans collateralised by commercial immovable property <sup>2)</sup>					
26 of which building renovation loans					
27 of which motor vehicle loans					
<b>28 Local governments financing</b>					
29 Housing financing					
30 Other local government financing					
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>					
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
<b>33 Financial and Non-financial undertakings</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
34 Loans and advances	X	X	X	X	X
35 of which loans collateralised by commercial immovable property	X	X	X	X	X
36 of which building renovation loans	X	X	X	X	X
37 Debt securities	X	X	X	X	X
38 Equity instruments	X	X	X	X	X
Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
40 Loans and advances	X	X	X	X	X
41 Debt securities	X	X	X	X	X
42 Equity instruments	X	X	X	X	X
<b>44 Derivatives</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>45 On demand interbank loans</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>46 Cash and cash-related assets</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>

	bg	bh	bi	bj	bk
Disclosure reference date T-1					
Based on the Turnover KPI	TOTAL (CCM + CCA)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)				
million €			Of which Use of Proceeds	Of which transitional	Of which enabling
Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X
47 Total GAR assets					
49 Assets not covered for GAR calculation	X	X	X	X	X
50 Central governments and Supranational issuers	X	X	X	X	X
51 Central banks exposure	X	X	X	X	X
52 Trading book	X	X	X	X	X
53 Total assets					
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations					
54 Financial guarantees					
55 Assets under management					
56 Of which debt securities					
57 Of which equity instruments					

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

25 Declaration on corporate governance

pursuant to Art. 315d in conjunction with

Art. 289f of the German Commercial Code (HGB)

36 Details pursuant to Art. 315 of the German Commercial Code (HGB).

42 Non-financial report

### 1. Assets for the calculation of GAR (based on the Cap Ex-KPI)

	a	b	c	d	e	f	g	h	i	j
Disclosure reference date T										
Based on the CapEx KPI	million €	Total [gross] carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator		X	X	X	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1	177,422	131,405	9,034	8,488	45	322	11	6	0
Financial undertakings	2	19,245	3,936	58	58	0	0	1		
Credit institutions	3	17,293	2,856							
Loans and advances	4	10,453	1,616							
Debt securities, including UoP <sup>1)</sup>	5	6,840	1,240							
Equity instruments	6				X				X	
Other financial corporations	7	1,952	1,080	58	58	0	0	1		
of which investment firms	8	115	0							
Loans and advances	9	115	0							
Debt securities, including UoP <sup>1)</sup>	10									
Equity instruments	11				X				X	
of which management companies	12	621	155							
Loans and advances	13	610	155							
Debt securities, including UoP <sup>1)</sup>	14	10								
Equity instruments	15				X				X	
of which insurance undertakings	16	33	4							
Loans and advances	17	33	4							
Debt securities, including UoP <sup>1)</sup>	18									
Equity instruments	19				X				X	
Non-financial undertakings	20	19,621	13,569	3,538	2,991	45	322	10	6	0
Loans and advances	21	18,648	13,220	3,454	2,991	29	296	9	6	0
Debt securities, including UoP <sup>1)</sup>	22	974	349	83		16	27	1	0	0
Equity instruments	23				X				X	
Households	24	129,771	113,883	5,438	5,438					
of which loans collateralised by commercial immovable property <sup>2)</sup>	25	106,920	103,857	4,673	4,673					
of which building renovation loans	26	3,758	3,758							
of which motor vehicle loans	27	394	98					X	X	X
Local governments financing	28	8,785	17							
Housing financing	29									
Other local government financing	30	8,785	17							
Collateral obtained by taking possession: residential and commercial immovable properties	31									
Assets excluded from the numerator for GAR calculation (covered in the denominator)	32	195,014								

	a	b	c	d	e	f	g	h	i	j
Disclosure reference date T										
Based on the CapEx KPI										
million €	Total [gross] carrying amount	Climate Change Mitigation (CCM) Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Climate Change Adaptation (CCA) Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling
<b>Financial and Non-financial undertakings</b>	<b>182,021</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	112,870	X	X	X	X	X	X	X	X	X
34 Loans and advances	77,823	X	X	X	X	X	X	X	X	X
35 of which loans collateralised by commercial immovable property	9,181	X	X	X	X	X	X	X	X	X
36 of which building renovation loans	340	X	X	X	X	X	X	X	X	X
37 Debt securities	34,448	X	X	X	X	X	X	X	X	X
38 Equity instruments	599	X	X	X	X	X	X	X	X	X
39 Non-EU country counterparties not subject to NFRD disclosure obligations	69,150	X	X	X	X	X	X	X	X	X
40 Loans and advances	50,970	X	X	X	X	X	X	X	X	X
41 Debt securities	18,061	X	X	X	X	X	X	X	X	X
42 Equity instruments	120	X	X	X	X	X	X	X	X	X
43 Derivatives	1,497	X	X	X	X	X	X	X	X	X
44 On demand interbank loans	131	X	X	X	X	X	X	X	X	X
45 Cash and cash-related assets	1,108	X	X	X	X	X	X	X	X	X
46 Other categories of assets (e.g. Goodwill, commodities etc.)	10,257	X	X	X	X	X	X	X	X	X
47 Total GAR assets	372,436	131,405	9,034	8,488	45	322	11	6		0
48 Assets not covered for GAR calculation	165,522	X	X	X	X	X	X	X	X	X
49 Central governments and Supranational issuers	37,568	X	X	X	X	X	X	X	X	X
50 Central banks exposure	101,396	X	X	X	X	X	X	X	X	X
51 Trading book	26,559	X	X	X	X	X	X	X	X	X
52 Total assets	537,959	131,405	9,034	8,488	45	322	11	6		0
<b>Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations</b>										
53 Financial guarantees	3,093	42	3		1	2				
54 Assets under management	46,194	20,893	3,067		11	300	5	1		0
55 Of which debt securities	38,613	20,435	2,729		8	123	4	0		0
56 Of which equity instruments	4,910	458	339		2	177	1	0		0

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	ab	ac	ad	ae	af
<b>Disclosure reference date T</b>					
<b>Based on the CapEx KPI</b>	<b>TOTAL (CCM + CCA)</b>				
	<b>Of which towards taxonomy relevant sectors (Taxonomy-eligible)</b>				
		<b>Of which environmentally sustainable (Taxonomy-aligned)</b>			
<b>million €</b>			<b>Of which Use of Proceeds</b>	<b>Of which transitional</b>	<b>Of which enabling</b>
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	131,416	9,040	8,488	45	323
<b>2 Financial undertakings</b>	<b>3,937</b>	<b>58</b>	<b>58</b>	<b>0</b>	<b>0</b>
3 Credit institutions	2,856				
4 Loans and advances	1,616				
5 Debt securities, including UoP <sup>1)</sup>	1,240				
6 Equity instruments			X		
7 Other financial corporations	1,081	58	58	0	0
8 of which investment firms	0				
9 Loans and advances	0				
10 Debt securities, including UoP <sup>1)</sup>					
11 Equity instruments			X		
12 of which management companies	155				
13 Loans and advances	155				
14 Debt securities, including UoP <sup>1)</sup>					
15 Equity instruments			X		
16 of which insurance undertakings	4				
17 Loans and advances	4				
18 Debt securities, including UoP <sup>1)</sup>					
19 Equity instruments			X		
<b>20 Non-financial undertakings</b>	<b>13,579</b>	<b>3,544</b>	<b>2,991</b>	<b>45</b>	<b>323</b>
21 Loans and advances	13,230	3,460	2,991	29	296
22 Debt securities, including UoP <sup>1)</sup>	349	83		16	27
23 Equity instruments			X		
<b>24 Households</b>	<b>113,883</b>	<b>5,438</b>	<b>5,438</b>		
25 of which loans collateralised by commercial immovable property <sup>2)</sup>	103,857	4,673	4,673		
26 of which building renovation loans	3,758				
27 of which motor vehicle loans	98				
<b>28 Local governments financing</b>	<b>17</b>				
29 Housing financing					
30 Other local government financing	17				
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>					
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
<b>33 Financial and Non-financial undertakings</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
34 Loans and advances	X	X	X	X	X
35 of which loans collateralised by commercial immovable property	X	X	X	X	X
36 of which building renovation loans	X	X	X	X	X
37 Debt securities	X	X	X	X	X
38 Equity instruments	X	X	X	X	X
Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
40 Loans and advances	X	X	X	X	X
41 Debt securities	X	X	X	X	X
42 Equity instruments	X	X	X	X	X
<b>44 Derivatives</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>45 On demand interbank loans</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>46 Cash and cash-related assets</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>



	ab	ac	ad	ae	af
Disclosure reference date T					
Based on the CapEx KPI		TOTAL (CCM + CCA)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)			
million €			Of which Use of Proceeds	Of which transitional	Of which enabling
Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X
47 Total GAR assets	131,416	9,040	8,488	45	323
49 Assets not covered for GAR calculation	X	X	X	X	X
50 Central governments and Supranational issuers	X	X	X	X	X
51 Central banks exposure	X	X	X	X	X
52 Trading book	X	X	X	X	X
53 Total assets	131,416	9,040	8,488	45	323
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations					
54 Financial guarantees	42	3		1	2
55 Assets under management	20,898	3,068		11	300
56 Of which debt securities	20,439	2,729		8	123
57 Of which equity instruments	459	339		3	177

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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[illegible]

	ag	ah	ai	aj	ak	al	am	an	ao	ap
Disclosure reference date T-1										
Based on the CapEx KPI										
million €	Total [gross] carrying amount		Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transi- tional	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling
31 Collateral obtained by taking possession: residential and commercial immovable properties										
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)										
33 Financial and Non-financial undertakings	X	X	X	X	X	X	X	X	X	X
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X	X	X
35 Loans and advances	X	X	X	X	X	X	X	X	X	X
36 of which loans collateralised by commercial immovable property	X	X	X	X	X	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X	X	X
39 Equity instruments	X	X	X	X	X	X	X	X	X	X
40 Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X	X	X
41 Loans and advances	X	X	X	X	X	X	X	X	X	X
42 Debt securities	X	X	X	X	X	X	X	X	X	X
43 Equity instruments	X	X	X	X	X	X	X	X	X	X
44 Derivatives	X	X	X	X	X	X	X	X	X	X
45 On demand interbank loans	X	X	X	X	X	X	X	X	X	X
46 Cash and cash-related assets	X	X	X	X	X	X	X	X	X	X
47 Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X	X	X	X	X	X
48 Total GAR assets										
49 Assets not covered for GAR calculation	X	X	X	X	X	X	X	X	X	X
50 Central governments and Supranational issuers	X	X	X	X	X	X	X	X	X	X
51 Central banks exposure	X	X	X	X	X	X	X	X	X	X
52 Trading book	X	X	X	X	X	X	X	X	X	X
53 Total assets										
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations										
54 Financial guarantees										
55 Assets under management										
56 Of which debt securities										
57 Of which equity instruments										

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	bg	bh	bi	bj	bk
<b>Disclosure reference date T-1</b>					
<b>Based on the CapEx KPI</b>	<b>TOTAL (CCM + CCA)</b>				
	<b>Of which towards taxonomy relevant sectors (Taxonomy-eligible)</b>				
	<b>Of which environmentally sustainable (Taxonomy-aligned)</b>				
<b>million €</b>			<b>Of which Use of Proceeds</b>	<b>Of which transi-tional</b>	<b>Of which enabling</b>
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation					
<b>2 Financial undertakings</b>					
3 Credit institutions					
4 Loans and advances					
5 Debt securities, including UoP <sup>1)</sup>					
6 Equity instruments			X		
7 Other financial corporations					
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including UoP <sup>1)</sup>					
11 Equity instruments			X		
12 of which management companies					
13 Loans and advances					
14 Debt securities, including UoP <sup>1)</sup>					
15 Equity instruments			X		
16 of which insurance undertakings					
17 Loans and advances					
18 Debt securities, including UoP <sup>1)</sup>					
19 Equity instruments			X		
<b>20 Non-financial undertakings</b>					
21 Loans and advances					
22 Debt securities, including UoP <sup>1)</sup>					
23 Equity instruments			X		
<b>24 Households</b>					
25 of which loans collateralised by commercial immovable property <sup>2)</sup>					
26 of which building renovation loans					
27 of which motor vehicle loans					
<b>28 Local governments financing</b>					
29 Housing financing					
30 Other local government financing					
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>					
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
<b>33 Financial and Non-financial undertakings</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
34 Loans and advances	X	X	X	X	X
35 of which loans collateralised by commercial immovable property	X	X	X	X	X
36 of which building renovation loans	X	X	X	X	X
37 Debt securities	X	X	X	X	X
38 Equity instruments	X	X	X	X	X
39 Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
40 Loans and advances	X	X	X	X	X
41 Debt securities	X	X	X	X	X
42 Equity instruments	X	X	X	X	X
<b>44 Derivatives</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>45 On demand interbank loans</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
<b>46 Cash and cash-related assets</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>

	bg	bh	bi	bj	bk
Disclosure reference date T-1					
Based on the CapEx KPI	TOTAL (CCM + CCA)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)				
million €			Of which Use of Proceeds	Of which transitional	Of which enabling
Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X
47 Total GAR assets					
48 Assets not covered for GAR calculation	X	X	X	X	X
49 Central governments and Supranational issuers	X	X	X	X	X
50 Central banks exposure	X	X	X	X	X
51 Trading book	X	X	X	X	X
52 Total assets					
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations					
54 Financial guarantees					
55 Assets under management					
56 Of which debt securities					
57 Of which equity instruments					

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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## 2. GAR sector information (based on the Turnover KPI)

		a	b	c	d	e	f	g	h
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD			
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)	
1	01.29 Growing of other perennial crops	0.0		X	X			X	X
2	01.30 Plant propagation	0.2		X	X			X	X
3	01.50 Mixed farming	5.5		X	X			X	X
4	01.63 Post-harvest crop activities	3.5		X	X			X	X
5	02.40 Support services to forestry	0.2		X	X			X	X
6	06.10 Extraction of crude petroleum	3.6	0.3	X	X			X	X
7	07.29 Mining of other non-ferrous metal ores	0.2		X	X			X	X
8	08.91 Mining of chemical and fertiliser minerals	36.4		X	X			X	X
9	10.13 Production of meat and poultry meat products	0.1		X	X			X	X
10	10.39 Other processing and preserving of fruit and vegetables	1.6		X	X			X	X
11	10.51 Operation of dairies and cheese making			X	X			X	X
12	10.52 Manufacture of ice cream	0.3		X	X			X	X
13	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	1.3		X	X			X	X
14	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	0.0		X	X			X	X
15	10.82 Manufacture of cocoa, chocolate and sugar confectionery	0.0		X	X			X	X
16	10.85 Manufacture of prepared meals and dishes	0.0		X	X			X	X
17	10.89 Manufacture of other food products n.e.c.	0.0		X	X			X	X
18	11.01 Distilling, rectifying and blending of spirits	1.0		X	X			X	X
19	11.02 Manufacture of wine from grape			X	X			X	X
20	11.05 Manufacture of beer			X	X			X	X
21	13.92 Manufacture of made-up textile articles, except apparel	0.0		X	X			X	X

	a	b	c	d	e	f	g	h
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
22 13.95 Manufacture of non-wovens and articles made from non-wovens, except apparel	0.0		X	X			X	X
23 13.96 Manufacture of other technical and industrial textiles	0.0		X	X			X	X
24 13.99 Manufacture of other textiles n.e.c.			X	X			X	X
25 14.19 Manufacture of other wearing apparel and accessories	5.7		X	X			X	X
26 15.20 Manufacture of footwear	0.0		X	X			X	X
27 16.23 Manufacture of other builders' carpentry and joinery	0.0	0.0	X	X			X	X
28 16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.2		X	X			X	X
29 17.11 Manufacture of pulp	0.1	0.1	X	X			X	X
30 17.12 Manufacture of paper and paperboard	0.2		X	X			X	X
31 17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0.3	0.3	X	X			X	X
32 17.22 Manufacture of household and sanitary goods and of toilet requisites			X	X			X	X
33 17.24 Manufacture of wallpaper			X	X			X	X
34 17.29 Manufacture of other articles of paper and paperboard			X	X			X	X
35 18.12 Other printing	0.5		X	X			X	X
36 20.13 Manufacture of other inorganic basic chemicals	0.9	0.0	X	X			X	X
37 20.14 Manufacture of other organic basic chemicals			X	X			X	X



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	a	b	c	d	e	f	g	h
Based on the Turnover KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
38 20.15 Manufacture of fertilisers and nitrogen compounds	0.3	0.0	X	X			X	X
39 20.16 Manufacture of plastics in primary forms	79.6		X	X			X	X
40 20.20 Manufacture of pesticides and other agrochemical products	0.5		X	X			X	X
41 20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.0		X	X			X	X
42 20.42 Manufacture of perfumes and toilet preparations	0.0		X	X			X	X
43 20.59 Manufacture of other chemical products n.e.c.	53.6	0.2	X	X			X	X
44 21.10 Manufacture of basic pharmaceutical products	4.5	0.0	X	X			X	X
45 21.20 Manufacture of pharmaceutical preparations			X	X			X	X
46 22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres			X	X			X	X
47 22.19 Manufacture of other rubber products			X	X			X	X
48 22.21 Manufacture of plastic plates, sheets, tubes and profiles	0.3		X	X			X	X
49 22.22 Manufacture of plastic packing goods	1.0		X	X			X	X
50 22.29 Manufacture of other plastic products	1.0		X	X			X	X
51 23.13 Manufacture of hollow glass			X	X			X	X
52 23.32 Manufacture of bricks, tiles and construction products, in baked clay	9.9	7.7	X	X			X	X
53 23.41 Manufacture of ceramic household and ornamental articles			X	X			X	X

		a	b	c	d	e	f	g	h
Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
54	23.51 Manufacture of cement	32.6	1.7	X	X			X	X
55	24.10 Manufacture of basic iron and steel and of ferro-alloys	20.5	15.6	X	X			X	X
56	24.42 Aluminium production	0.6		X	X			X	X
57	24.44 Copper production			X	X			X	X
58	24.45 Other non-ferrous metal production	3.6	3.6	X	X			X	X
59	24.53 Casting of light metals			X	X			X	X
60	25.11 Manufacture of metal structures and parts of structures	20.1		X	X			X	X
61	25.12 Manufacture of doors and windows of metal			X	X			X	X
62	25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	1.2		X	X			X	X
63	25.61 Treatment and coating of metals	0.7		X	X			X	X
64	25.71 Manufacture of cutlery			X	X			X	X
65	25.73 Manufacture of tools	0.1		X	X			X	X
66	25.99 Manufacture of other fabricated metal products n.e.c.	0.4		X	X			X	X
67	26.11 Manufacture of electronic components	202.6		X	X			X	X
68	26.20 Manufacture of computers and peripheral equipment	9.4		X	X			X	X
69	26.30 Manufacture of communication equipment			X	X			X	X

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	a	b	c	d	e	f	g	h
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
26.51 Manufacture of instruments and appliances for measuring, testing and navigation	1.5	0.0	X	X			X	X
70								
26.70 Manufacture of optical instruments and photographic equipment	1.2	1.2	X	X			X	X
71								
27.12 Manufacture of electricity distribution and control apparatus	47.3	43.5	X	X			X	X
72								
27.20 Manufacture of batteries and accumulators	4.7		X	X			X	X
73								
27.31 Manufacture of fibre optic cables	0.0	0.0	X	X			X	X
74								
27.32 Manufacture of other electronic and electric wires and cables			X	X			X	X
75								
27.40 Manufacture of electric lighting equipment	4.7	0.6	X	X			X	X
76								
27.51 Manufacture of electric domestic appliances	0.3	0.3	X	X	0.0	0.0	X	X
77								
27.52 Manufacture of non- electric domestic appliances	0.2		X	X			X	X
78								
27.90 Manufacture of other electrical equipment	0.0		X	X			X	X
79								
28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	1.0	0.2	X	X			X	X
80								
28.13 Manufacture of other pumps and compressors			X	X			X	X
81								
28.15 Manufacture of bearings, gears, gearing and driving elements	1.0		X	X			X	X
82								

	a	b	c	d	e	f	g	h
Based on the Turnover KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
83 28.21 Manufacture of ovens, furnaces and furnace burners	0.0	0.0	X	X			X	X
84 28.22 Manufacture of lifting and handling equipment	70.7		X	X			X	X
85 28.29 Manufacture of other general-purpose machinery n.e.c.	19.2		X	X			X	X
86 28.41 Manufacture of metal forming machinery			X	X	0.7	0.7	X	X
87 28.49 Manufacture of other machine tools	0.3		X	X			X	X
88 28.91 Manufacture of machinery for metallurgy	1.6	0.5	X	X			X	X
89 28.92 Manufacture of machinery for mining, quarrying and construction			X	X			X	X
90 28.93 Manufacture of machinery for food, beverage and tobacco processing	0.7	0.0	X	X			X	X
91 28.95 Manufacture of machinery for paper and paperboard production	42.1	11.3	X	X			X	X
92 28.99 Manufacture of other special-purpose machinery n.e.c.	2.6	0.5	X	X			X	X
93 29.10 Manufacture of motor vehicles	317.5	33.3	X	X			X	X
94 29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	32.0		X	X			X	X
95 30.11 Building of ships and floating structures	15.4		X	X			X	X
96 30.12 Building of pleasure and sporting boats			X	X			X	X
97 30.20 Manufacture of railway locomotives and rolling stock	72.6	43.2	X	X			X	X

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Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
98	30.40 Manufacture of military fighting vehicles	44.2		X	X			X	X
99	30.99 Manufacture of other transport equipment n.e.c.	16.1	0.0	X	X			X	X
100	31.09 Manufacture of other furniture	0.5		X	X			X	X
101	32.40 Manufacture of games and toys	0.2		X	X			X	X
102	32.50 Manufacture of medical and dental instruments and supplies	0.1		X	X			X	X
103	32.99 Other manufacturing n.e.c.	6.8	0.0	X	X			X	X
104	35.11 Production of electricity	3223.5	2986.5	X	X			X	X
105	35.12 Transmission of electricity			X	X			X	X
106	35.14 Trade of electricity			X	X	3.2	3.2	X	X
107	35.30 Steam and air conditioning supply	0.8		X	X			X	X
108	36.00 Water collection, treatment and supply	18.8	13.1	X	X			X	X
109	38.21 Treatment and disposal of non-hazardous waste	0.0		X	X			X	X
110	38.32 Recovery of sorted materials	0.5		X	X			X	X
111	39.00 Remediation activities and other waste management services			X	X			X	X
112	41.10 Development of building projects	57.8		X	X			X	X
113	41.20 Construction of residential and non-residential buildings	33.4	4.4	X	X	2.1	0.4	X	X
114	42.12 Construction of railways and underground railways	0.6		X	X			X	X
115	42.91 Construction of water projects			X	X			X	X
116	42.99 Construction of other civil engineering projects n.e.c.	29.4	2.2	X	X	1.1	0.1	X	X
117	43.21 Electrical installation	0.5		X	X			X	X
118	43.22 Plumbing, heat and air-conditioning installation	0.8	0.0	X	X			X	X

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Based on the Turnover KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
119 43.29 Other construction installation	34.3	27.6	X	X			X	X
120 43.33 Floor and wall covering	0.0		X	X			X	X
121 43.91 Roofing activities	0.1		X	X			X	X
122 43.99 Other specialised construction activities n.e.c.	10.2		X	X			X	X
123 45.11 Sale of cars and light motor vehicles	0.5		X	X			X	X
124 45.19 Sale of other motor vehicles	0.3		X	X			X	X
125 45.20 Maintenance and repair of motor vehicles	3.5		X	X			X	X
126 45.31 Wholesale trade of motor vehicle parts and accessories			X	X			X	X
127 45.32 Retail trade of motor vehicle parts and accessories			X	X			X	X
128 46.18 Agents specialised in the sale of other particular products	0.1		X	X			X	X
129 46.19 Agents involved in the sale of a variety of goods	0.1		X	X			X	X
130 46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	3.0	2.8	X	X			X	X
131 46.32 Wholesale of meat and meat products	0.2		X	X			X	X
132 46.39 Non-specialised wholesale of food, beverages and tobacco	8.7		X	X			X	X
133 46.41 Wholesale of textiles	0.1		X	X			X	X
134 46.43 Wholesale of electrical household appliances	1.2		X	X			X	X

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		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
135	46.45 Wholesale of perfume and cosmetics	0.7		X	X			X	X
136	46.46 Wholesale of pharmaceutical goods			X	X			X	X
137	46.49 Wholesale of other household goods	0.7		X	X			X	X
138	46.69 Wholesale of other machinery and equipment	4.7		X	X			X	X
139	46.71 Wholesale of solid, liquid and gaseous fuels and related products	0.5		X	X			X	X
140	46.72 Wholesale of metals and metal ores	0.2		X	X			X	X
141	46.73 Wholesale of wood, construction materials and sanitary equipment	1.9		X	X			X	X
142	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.8		X	X			X	X
143	46.75 Wholesale of chemical products	0.6		X	X			X	X
144	46.76 Wholesale of other intermediate products			X	X			X	X
145	46.77 Wholesale of waste and scrap	0.0		X	X			X	X
146	46.90 Non-specialised wholesale trade	1.5		X	X			X	X
147	47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	0.1	0.0	X	X			X	X



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	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
148 47.19 Other retail sale in non-specialised stores	0.2		X	X			X	X
149 47.22 Retail sale of meat and meat products in specialised stores	1.7		X	X			X	X
150 47.29 Other retail sale of food in specialised stores	11.5		X	X			X	X
151 47.30 Retail sale of automotive fuel in specialised stores	1.2		X	X			X	X
152 47.43 Retail sale of audio and video equipment in specialised stores	0.5		X	X			X	X
153 47.51 Retail sale of textiles in specialised stores	1.1		X	X			X	X
154 47.52 Retail sale of hardware, paints and glass in specialised stores	0.1		X	X			X	X
155 47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.1		X	X			X	X
156 47.71 Retail sale of clothing in specialised stores	0.0		X	X			X	X
157 47.72 Retail sale of footwear and leather goods in specialised stores	0.1	0.0	X	X			X	X
158 47.73 Dispensing chemist in specialised stores	1.1		X	X			X	X
159 47.78 Other retail sale of new goods in specialised stores	1.6		X	X			X	X
160 47.91 Retail sale via mail order houses or via Internet	4.6		X	X			X	X
161 47.99 Other retail sale not in stores, stalls or markets	0.1		X	X			X	X
162 49.10 Passenger rail transport, interurban	158.4		X	X			X	X
163 49.39 Other passenger land transport n.e.c.	12.9	0.7	X	X			X	X
164 49.41 Freight transport by road			X	X			X	X

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		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
165	50.20 Sea and coastal freight water transport			X	X			X	X
166	51.10 Passenger air transport	55.6		X	X			X	X
167	52.21 Service activities incidental to land transportation	1.9		X	X			X	X
168	52.23 Service activities incidental to air transportation	98.7	4.0	X	X			X	X
169	52.29 Other transportation support activities	1.5		X	X			X	X
170	55.10 Hotels and similar accommodation	75.3		X	X			X	X
171	55.20 Holiday and other short-stay accommodation	1.1		X	X			X	X
172	56.10 Restaurants and mobile food service activities	0.2		X	X			X	X
173	56.21 Event catering activities	0.5		X	X			X	X
174	56.29 Other food service activities	0.8		X	X			X	X
175	58.13 Publishing of newspapers	0.0		X	X			X	X
176	58.19 Other publishing activities	0.4		X	X			X	X
177	59.11 Motion picture, video and television programme production activities			X	X			X	X
178	59.20 Sound recording and music publishing activities	0.0		X	X			X	X
179	60.20 Television programming and broadcasting activities	0.1	0.1	X	X	0.0	0.0	X	X
180	61.10 Wired telecommunications activities			X	X			X	X

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	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
181 61.20 Wireless telecommunications activities	0.0	0.0	X	X	1.1	0.9	X	X
182 61.90 Other telecommunications activities	18.3	0.5	X	X			X	X
183 62.01 Computer programming activities	0.0		X	X			X	X
184 62.02 Computer consultancy activities	6.0	4.3	X	X	2.9	2.9	X	X
185 62.03 Computer facilities management activities			X	X			X	X
186 62.09 Other information technology and computer service activities	4.7	2.1	X	X			X	X
187 63.11 Data processing, hosting and related activities			X	X			X	X
188 63.12 Web portals			X	X			X	X
189 64.19 Other monetary intermediation	1.7		X	X			X	X
190 64.20 Activities of holding companies			X	X			X	X
191 64.99 Other financial service activities, except insurance and pension funding n.e.c.	1.7		X	X			X	X
192 68.10 Buying and selling of own real estate	927.8		X	X			X	X
193 68.20 Renting and operating of own or leased real estate	5042.8	0.0	X	X			X	X
194 68.31 Real estate agencies	97.0		X	X			X	X
195 68.32 Management of real estate on a fee or contract basis	1326.5		X	X			X	X
196 69.10 Legal activities	0.9		X	X			X	X
197 69.20 Accounting, bookkeeping and auditing activities; tax consultancy			X	X			X	X

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		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount million €		[Gross] carrying amount million €		[Gross] carrying amount million €		[Gross] carrying amount million €	
			Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (CCA)
198	70.10 Activities of head offices	92.3	4.0	X	X			X	X
199	70.22 Business and other management consultancy activities	11.7		X	X			X	X
200	71.11 Architectural activities	1.0		X	X			X	X
201	71.12 Engineering activities and related technical consultancy	0.8		X	X			X	X
202	71.20 Technical testing and analysis	16.7		X	X			X	X
203	72.11 Research and experimental development on biotechnology			X	X			X	X
204	72.19 Other research and experimental development on natural sciences and engineering	3.5		X	X			X	X
205	73.11 Advertising agencies	0.0		X	X			X	X
206	73.12 Media representation	0.4		X	X			X	X
207	73.20 Market research and public opinion polling	0.0		X	X			X	X
208	74.10 Specialised design activities			X	X			X	X
209	74.90 Other professional, scientific and technical activities n.e.c.	65.8		X	X			X	X
210	75.00 Veterinary activities	5.8		X	X			X	X
211	77.11 Renting and leasing of cars and light motor vehicles	0.2		X	X			X	X
212	77.29 Renting and leasing of other personal and household goods	0.0		X	X			X	X
213	77.31 Renting and leasing of agricultural machinery and equipment	0.0		X	X			X	X
214	78.20 Temporary employment agency activities			X	X			X	X

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Based on the Turnover KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
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	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
215 79.12 Tour operator activities	1.9		X	X			X	X
216 80.10 Private security activities	8.2	0.0	X	X			X	X
217 81.22 Other building and industrial cleaning activities	0.2		X	X			X	X
218 81.30 Landscape service activities	0.4		X	X			X	X
219 82.91 Activities of collection agencies and credit bureaus	0.7		X	X			X	X
220 82.99 Other business support service activities n.e.c.	11.5		X	X			X	X
221 85.10 Pre-primary education	0.9		X	X			X	X
222 86.10 Hospital activities	0.5		X	X			X	X
223 86.21 General medical practice activities	0.0		X	X			X	X
224 86.22 Specialist medical practice activities	5.8		X	X			X	X
225 86.90 Other human health activities	0.6		X	X			X	X
226 87.10 Residential nursing care activities	0.1		X	X			X	X
227 87.90 Other residential care activities	1.5		X	X			X	X
228 90.02 Support activities to performing arts	0.1		X	X			X	X
229 92.00 Gambling and betting activities			X	X			X	X
230 93.11 Operation of sports facilities	1.9		X	X			X	X
231 93.21 Activities of amusement parks and theme parks	15.5		X	X			X	X
232 93.29 Other amusement and recreation activities	7.3		X	X			X	X
233 94.99 Activities of other membership organisations n.e.c.	4.7		X	X			X	X

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	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
234 96.01 Washing and (dry- cleaning of textile and fur products	0.4		X	X			X	X
235 96.04 Physical well-being activities			X	X			X	X
236 96.09 Other personal service activities n.e.c.	100.6		X	X			X	X
...			X	X			X	X

		y	z	aa	ab
		TOTAL (CCM + CCA)			
Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	01.29 Growing of other perennial crops	0.0		X	X
2	01.30 Plant propagation	0.2		X	X
3	01.50 Mixed farming	5.5		X	X
4	01.63 Post-harvest crop activities	3.5		X	X
5	02.40 Support services to forestry	0.2		X	X
6	06.10 Extraction of crude petroleum	3.6	0.3	X	X
7	07.29 Mining of other non-ferrous metal ores	0.2		X	X
8	08.91 Mining of chemical and fertiliser minerals	36.4		X	X
9	10.13 Production of meat and poultry meat products	0.1		X	X
10	10.39 Other processing and preserving of fruit and vegetables	1.6		X	X
11	10.51 Operation of dairies and cheese making			X	X
12	10.52 Manufacture of ice cream	0.3		X	X
13	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	1.3		X	X
14	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	0.0		X	X
15	10.82 Manufacture of cocoa, chocolate and sugar confectionery	0.0		X	X
16	10.85 Manufacture of prepared meals and dishes	0.0		X	X
17	10.89 Manufacture of other food products n.e.c.	0.0		X	X
18	11.01 Distilling, rectifying and blending of spirits	1.0		X	X
19	11.02 Manufacture of wine from grape			X	X
20	11.05 Manufacture of beer			X	X
21	13.92 Manufacture of made-up textile articles, except apparel	0.0		X	X



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	TOTAL (CCM + CCA)			
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Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
22 13.95 Manufacture of non-wovens and articles made from non-wovens, except apparel	0.0		X	X
23 13.96 Manufacture of other technical and industrial textiles	0.0		X	X
24 13.99 Manufacture of other textiles n.e.c.			X	X
25 14.19 Manufacture of other wearing apparel and accessories	5.7		X	X
26 15.20 Manufacture of footwear	0.0		X	X
27 16.23 Manufacture of other builders' carpentry and joinery	0.0	0.0	X	X
28 16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.2		X	X
29 17.11 Manufacture of pulp	0.1	0.1	X	X
30 17.12 Manufacture of paper and paperboard	0.2		X	X
31 17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0.3	0.3	X	X
32 17.22 Manufacture of household and sanitary goods and of toilet requisites			X	X
33 17.24 Manufacture of wallpaper			X	X
34 17.29 Manufacture of other articles of paper and paperboard			X	X
35 18.12 Other printing	0.5		X	X
36 20.13 Manufacture of other inorganic basic chemicals	0.9	0.0	X	X
37 20.14 Manufacture of other organic basic chemicals			X	X
38 20.15 Manufacture of fertilisers and nitrogen compounds	0.3	0.0	X	X

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	TOTAL (CCM + CCA)			
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Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
39 20.16 Manufacture of plastics in primary forms	79.6		X	X
40 20.20 Manufacture of pesticides and other agrochemical products	0.5		X	X
41 20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.0		X	X
42 20.42 Manufacture of perfumes and toilet preparations	0.0		X	X
43 20.59 Manufacture of other chemical products n.e.c.	53.6	0.2	X	X
44 21.10 Manufacture of basic pharmaceutical products	4.5	0.0	X	X
45 21.20 Manufacture of pharmaceutical preparations			X	X
46 22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres			X	X
47 22.19 Manufacture of other rubber products			X	X
48 22.21 Manufacture of plastic plates, sheets, tubes and profiles	0.3		X	X
49 22.22 Manufacture of plastic packing goods	1.0		X	X
50 22.29 Manufacture of other plastic products	1.0		X	X
51 23.13 Manufacture of hollow glass			X	X
52 23.32 Manufacture of bricks, tiles and construction products, in baked clay	9.9	7.7	X	X
53 23.41 Manufacture of ceramic household and ornamental articles			X	X
54 23.51 Manufacture of cement	32.6	1.7	X	X
55 24.10 Manufacture of basic iron and steel and of ferro-alloys	20.5	15.6	X	X

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	TOTAL (CCM + CCA)			
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	[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
56 24.42 Aluminium production	0.6		X	X
57 24.44 Copper production			X	X
58 24.45 Other non-ferrous metal production	3.6	3.6	X	X
59 24.53 Casting of light metals			X	X
60 25.11 Manufacture of metal structures and parts of structures	20.1		X	X
61 25.12 Manufacture of doors and windows of metal			X	X
62 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	1.2		X	X
63 25.61 Treatment and coating of metals	0.7		X	X
64 25.71 Manufacture of cutlery			X	X
65 25.73 Manufacture of tools	0.1		X	X
66 25.99 Manufacture of other fabricated metal products n.e.c.	0.4		X	X
67 26.11 Manufacture of electronic components	202.6		X	X
68 26.20 Manufacture of computers and peripheral equipment	9.4		X	X
69 26.30 Manufacture of communication equipment			X	X
70 26.51 Manufacture of instruments and appliances for measuring, testing and navigation	1.5	0.0	X	X
71 26.70 Manufacture of optical instruments and photographic equipment	1.2	1.2	X	X

	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
72 27.12 Manufacture of electricity distribution and control apparatus	47.3	43.5	X	X
73 27.20 Manufacture of batteries and accumulators	4.7		X	X
74 27.31 Manufacture of fibre optic cables	0.0	0.0	X	X
75 27.32 Manufacture of other electronic and electric wires and cables			X	X
76 27.40 Manufacture of electric lighting equipment	4.7	0.6	X	X
77 27.51 Manufacture of electric domestic appliances	0.3	0.3	X	X
78 27.52 Manufacture of non-electric domestic appliances	0.2		X	X
79 27.90 Manufacture of other electrical equipment	0.0		X	X
80 28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	1.0	0.2	X	X
81 28.13 Manufacture of other pumps and compressors			X	X
82 28.15 Manufacture of bearings, gears, gearing and driving elements	1.0		X	X
83 28.21 Manufacture of ovens, furnaces and furnace burners	0.0	0.0	X	X
84 28.22 Manufacture of lifting and handling equipment	70.7		X	X
85 28.29 Manufacture of other general-purpose machinery n.e.c.	19.2		X	X
86 28.41 Manufacture of metal forming machinery	0.7	0.7	X	X
87 28.49 Manufacture of other machine tools	0.3		X	X

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		y	z	aa	ab
		TOTAL (CCM + CCA)			
Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
88	28.91 Manufacture of machinery for metallurgy	1.6	0.5	X	X
89	28.92 Manufacture of machinery for mining, quarrying and construction			X	X
90	28.93 Manufacture of machinery for food, beverage and tobacco processing	0.7	0.0	X	X
91	28.95 Manufacture of machinery for paper and paperboard production	42.1	11.3	X	X
92	28.99 Manufacture of other special-purpose machinery n.e.c.	2.6	0.5	X	X
93	29.10 Manufacture of motor vehicles	317.5	33.3	X	X
94	29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	32.0		X	X
95	30.11 Building of ships and floating structures	15.4		X	X
96	30.12 Building of pleasure and sporting boats			X	X
97	30.20 Manufacture of railway locomotives and rolling stock	72.6	43.2	X	X
98	30.40 Manufacture of military fighting vehicles	44.2		X	X
99	30.99 Manufacture of other transport equipment n.e.c.	16.1	0.0	X	X
100	31.09 Manufacture of other furniture	0.5		X	X
101	32.40 Manufacture of games and toys	0.2		X	X
102	32.50 Manufacture of medical and dental instruments and supplies	0.1		X	X
103	32.99 Other manufacturing n.e.c.	6.8	0.0	X	X
104	35.11 Production of electricity	3223.5	2986.5	X	X
105	35.12 Transmission of electricity			X	X

		y	z	aa	ab
		TOTAL (CCM + CCA)			
Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
106	35.14 Trade of electricity	3.2	3.2	X	X
107	35.30 Steam and air conditioning supply	0.8		X	X
108	36.00 Water collection, treatment and supply	18.8	13.1	X	X
109	38.21 Treatment and disposal of non-hazardous waste	0.0		X	X
110	38.32 Recovery of sorted materials	0.5		X	X
111	39.00 Remediation activities and other waste management services			X	X
112	41.10 Development of building projects	57.8		X	X
113	41.20 Construction of residential and non-residential buildings	35.5	4.8	X	X
114	42.12 Construction of railways and underground railways	0.6		X	X
115	42.91 Construction of water projects			X	X
116	42.99 Construction of other civil engineering projects n.e.c.	30.5	2.3	X	X
117	43.21 Electrical installation	0.5		X	X
118	43.22 Plumbing, heat and air-conditioning installation	0.8	0.0	X	X
119	43.29 Other construction installation	34.3	27.6	X	X
120	43.33 Floor and wall covering	0.0		X	X
121	43.91 Roofing activities	0.1		X	X
122	43.99 Other specialised construction activities n.e.c.	10.2		X	X
123	45.11 Sale of cars and light motor vehicles	0.5		X	X
124	45.19 Sale of other motor vehicles	0.3		X	X
125	45.20 Maintenance and repair of motor vehicles	3.5		X	X
126	45.31 Wholesale trade of motor vehicle parts and accessories			X	X
127	45.32 Retail trade of motor vehicle parts and accessories			X	X

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	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
128 46.18 Agents specialised in the sale of other particular products	0.1		X	X
129 46.19 Agents involved in the sale of a variety of goods	0.1		X	X
130 46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	3.0	2.8	X	X
131 46.32 Wholesale of meat and meat products	0.2		X	X
132 46.39 Non-specialised wholesale of food, beverages and tobacco	8.7		X	X
133 46.41 Wholesale of textiles	0.1		X	X
134 46.43 Wholesale of electrical household appliances	1.2		X	X
135 46.45 Wholesale of perfume and cosmetics	0.7		X	X
136 46.46 Wholesale of pharmaceutical goods			X	X
137 46.49 Wholesale of other household goods	0.7		X	X
138 46.69 Wholesale of other machinery and equipment	4.7		X	X
139 46.71 Wholesale of solid, liquid and gaseous fuels and related products	0.5		X	X
140 46.72 Wholesale of metals and metal ores	0.2		X	X
141 46.73 Wholesale of wood, construction materials and sanitary equipment	1.9		X	X
142 46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.8		X	X



	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
143 46.75 Wholesale of chemical products	0.6		X	X
144 46.76 Wholesale of other intermediate products			X	X
145 46.77 Wholesale of waste and scrap	0.0		X	X
146 46.90 Non-specialised wholesale trade	1.5	0.0	X	X
147 47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	0.1	0.0	X	X
148 47.19 Other retail sale in non-specialised stores	0.2		X	X
149 47.22 Retail sale of meat and meat products in specialised stores	1.7		X	X
150 47.29 Other retail sale of food in specialised stores	11.5		X	X
151 47.30 Retail sale of automotive fuel in specialised stores	1.2		X	X
152 47.43 Retail sale of audio and video equipment in specialised stores	0.5		X	X
153 47.51 Retail sale of textiles in specialised stores	1.1		X	X
154 47.52 Retail sale of hardware, paints and glass in specialised stores	0.1		X	X
155 47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.1		X	X
156 47.71 Retail sale of clothing in specialised stores	0.0		X	X
157 47.72 Retail sale of footwear and leather goods in specialised stores	0.1	0.0	X	X
158 47.73 Dispensing chemist in specialised stores	1.1		X	X
159 47.78 Other retail sale of new goods in specialised stores	1.6		X	X
160 47.91 Retail sale via mail order houses or via Internet	4.6		X	X
161 47.99 Other retail sale not in stores, stalls or markets	0.1		X	X

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	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
162 49.10 Passenger rail transport, interurban	158.4		X	X
163 49.39 Other passenger land transport n.e.c.	12.9	0.7	X	X
164 49.41 Freight transport by road			X	X
165 50.20 Sea and coastal freight water transport			X	X
166 51.10 Passenger air transport	55.6		X	X
167 52.21 Service activities incidental to land transportation	1.9		X	X
168 52.23 Service activities incidental to air transportation	98.7	4.0	X	X
169 52.29 Other transportation support activities	1.5		X	X
170 55.10 Hotels and similar accommodation	75.3		X	X
171 55.20 Holiday and other short-stay accommodation	1.1		X	X
172 56.10 Restaurants and mobile food service activities	0.2		X	X
173 56.21 Event catering activities	0.5		X	X
174 56.29 Other food service activities	0.8		X	X
175 58.13 Publishing of newspapers	0.0		X	X
176 58.19 Other publishing activities	0.4		X	X
177 59.11 Motion picture, video and television programme production activities			X	X
178 59.20 Sound recording and music publishing activities	0.0		X	X
179 60.20 Television programming and broadcasting activities	0.1	0.1	X	X

	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
180 61.10 Wired telecommunications activities			X	X
181 61.20 Wireless telecommunications activities	1.1	0.9	X	X
182 61.90 Other telecommunications activities	18.3	0.5	X	X
183 62.01 Computer programming activities	0.0		X	X
184 62.02 Computer consultancy activities	8.9	7.1	X	X
185 62.03 Computer facilities management activities			X	X
186 62.09 Other information technology and computer service activities	4.7	2.1	X	X
187 63.11 Data processing, hosting and related activities			X	X
188 63.12 Web portals			X	X
189 64.19 Other monetary intermediation	1.7		X	X
190 64.20 Activities of holding companies			X	X
191 64.99 Other financial service activities, except insurance and pension funding n.e.c.	1.7		X	X
192 68.10 Buying and selling of own real estate	927.8		X	X
193 68.20 Renting and operating of own or leased real estate	5042.8	0.0	X	X
194 68.31 Real estate agencies	97.0		X	X
195 68.32 Management of real estate on a fee or contract basis	1326.5		X	X
196 69.10 Legal activities	0.9		X	X
197 69.20 Accounting, bookkeeping and auditing activities; tax consultancy			X	X
198 70.10 Activities of head offices	92.3	4.0	X	X

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	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
199 70.22 Business and other management consultancy activities	11.7		X	X
200 71.11 Architectural activities	1.0		X	X
201 71.12 Engineering activities and related technical consultancy	0.8		X	X
202 71.20 Technical testing and analysis	16.7		X	X
203 72.11 Research and experimental development on biotechnology			X	X
204 72.19 Other research and experimental development on natural sciences and engineering	3.5		X	X
205 73.11 Advertising agencies	0.0		X	X
206 73.12 Media representation	0.4		X	X
207 73.20 Market research and public opinion polling	0.0		X	X
208 74.10 Specialised design activities			X	X
209 74.90 Other professional, scientific and technical activities n.e.c.	65.8		X	X
210 75.00 Veterinary activities	5.8		X	X
211 77.11 Renting and leasing of cars and light motor vehicles	0.2		X	X
212 77.29 Renting and leasing of other personal and household goods	0.0		X	X
213 77.31 Renting and leasing of agricultural machinery and equipment	0.0		X	X
214 78.20 Temporary employment agency activities			X	X
215 79.12 Tour operator activities	1.9		X	X
216 80.10 Private security activities	8.2	0.0	X	X
217 81.22 Other building and industrial cleaning activities	0.2		X	X
218 81.30 Landscape service activities	0.4		X	X

	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
219 82.91 Activities of collection agencies and credit bureaus	0.7		X	X
220 82.99 Other business support service activities n.e.c.	11.5		X	X
221 85.10 Pre-primary education	0.9		X	X
222 86.10 Hospital activities	0.5		X	X
223 86.21 General medical practice activities	0.0		X	X
224 86.22 Specialist medical practice activities	5.8		X	X
225 86.90 Other human health activities	0.6		X	X
226 87.10 Residential nursing care activities	0.1		X	X
227 87.90 Other residential care activities	1.5		X	X
228 90.02 Support activities to performing arts	0.1		X	X
229 92.00 Gambling and betting activities			X	X
230 93.11 Operation of sports facilities	1.9		X	X
231 93.21 Activities of amusement parks and theme parks	15.5		X	X
232 93.29 Other amusement and recreation activities	7.3		X	X
233 94.99 Activities of other membership organisations n.e.c.	4.7		X	X
234 96.01 Washing and (dry-)cleaning of textile and fur products	0.4		X	X
235 96.04 Physical well-being activities			X	X
236 96.09 Other personal service activities n.e.c.	100.6		X	X
...			X	X

<sup>1)</sup> Only sectors/NACE codes with an exposure (gross carrying amount) greater than 0 are shown in the template.

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## 2. GAR sector information (based on the Cap Ex-KPI)

		a	b	c	d	e	f	g	h
Based on the CapEx KPI   <									

	a	b	c	d	e	f	g	h
Based on the CapEx KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
22 13.95 Manufacture of non- wovens and articles made from non-wovens, except apparel	0.0		X	X			X	X
23 13.96 Manufacture of other technical and industrial textiles	0.0		X	X			X	X
24 13.99 Manufacture of other textiles n.e.c.			X	X			X	X
25 14.19 Manufacture of other wearing apparel and accessories	5.7		X	X			X	X
26 15.20 Manufacture of footwear	0.0		X	X			X	X
27 16.23 Manufacture of other builders' carpentry and joinery	0.0	0.0	X	X	0.0	0.0	X	X
28 16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.2		X	X			X	X
29 17.11 Manufacture of pulp	0.2	0.2	X	X			X	X
30 17.12 Manufacture of paper and paperboard	13.9	2.3	X	X			X	X
31 17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0.3	0.3	X	X			X	X
32 17.22 Manufacture of household and sanitary goods and of toilet requisites			X	X			X	X
33 17.24 Manufacture of wallpaper			X	X			X	X
34 17.29 Manufacture of other articles of paper and paperboard			X	X			X	X
35 18.12 Other printing	0.5		X	X			X	X
36 20.13 Manufacture of other inorganic basic chemicals	0.4	0.1	X	X			X	X
37 20.14 Manufacture of other organic basic chemicals	0.1		X	X			X	X
38 20.15 Manufacture of fertilisers and nitrogen compounds	0.4	0.0	X	X			X	X

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		a	b	c	d	e	f	g	h
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
39	20.16 Manufacture of plastics in primary forms	113.3	12.5	X	X			X	X
40	20.20 Manufacture of pesticides and other agrochemical products	0.5		X	X			X	X
41	20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.0		X	X			X	X
42	20.42 Manufacture of perfumes and toilet preparations	0.0		X	X			X	X
43	20.59 Manufacture of other chemical products n.e.c.	44.6	0.1	X	X			X	X
44	21.10 Manufacture of basic pharmaceutical products	6.4	0.0	X	X			X	X
45	21.20 Manufacture of pharmaceutical preparations	2.9		X	X			X	X
46	22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres			X	X			X	X
47	22.19 Manufacture of other rubber products	0.1	0.1	X	X			X	X
48	22.21 Manufacture of plastic plates, sheets, tubes and profiles	1.4		X	X			X	X
49	22.22 Manufacture of plastic packing goods	1.0		X	X			X	X
50	22.29 Manufacture of other plastic products	4.1		X	X			X	X
51	23.13 Manufacture of hollow glass	1.5	0.4	X	X			X	X
52	23.32 Manufacture of bricks, tiles and construction products, in baked clay	8.3	7.0	X	X			X	X
53	23.41 Manufacture of ceramic household and ornamental articles	0.0		X	X			X	X
54	23.51 Manufacture of cement	36.3	6.6	X	X			X	X
55	24.10 Manufacture of basic iron and steel and of ferro- alloys	18.0	12.0	X	X			X	X



		a	b	c	d	e	f	g	h
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
56	24.42 Aluminium production	0.6		X	X			X	X
57	24.44 Copper production			X	X			X	X
58	24.45 Other non-ferrous metal production	26.4	26.4	X	X			X	X
59	24.53 Casting of light metals			X	X			X	X
60	25.11 Manufacture of metal structures and parts of structures	15.2		X	X			X	X
61	25.12 Manufacture of doors and windows of metal			X	X			X	X
62	25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	1.2		X	X			X	X
63	25.61 Treatment and coating of metals	0.7		X	X			X	X
64	25.71 Manufacture of cutlery			X	X			X	X
65	25.73 Manufacture of tools	0.1		X	X			X	X
66	25.99 Manufacture of other fabricated metal products n.e.c.	0.4		X	X			X	X
67	26.11 Manufacture of electronic components	274.3		X	X			X	X
68	26.20 Manufacture of computers and peripheral equipment	8.6		X	X			X	X
69	26.30 Manufacture of communication equipment	0.9		X	X			X	X
70	26.51 Manufacture of instruments and appliances for measuring, testing and navigation	10.1	0.5	X	X			X	X
71	26.70 Manufacture of optical instruments and photographic equipment	0.4	0.3	X	X			X	X

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Based on the CapEx KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
72 27.12 Manufacture of electricity distribution and control apparatus	49.8	43.9	X	X			X	X
73 27.20 Manufacture of batteries and accumulators	2.5		X	X			X	X
74 27.31 Manufacture of fibre optic cables	0.0	0.0	X	X			X	X
75 27.32 Manufacture of other electronic and electric wires and cables			X	X			X	X
76 27.40 Manufacture of electric lighting equipment	4.7	0.7	X	X			X	X
77 27.51 Manufacture of electric domestic appliances	0.2	0.2	X	X	0.3	0.3	X	X
78 27.52 Manufacture of non- electric domestic appliances	0.2		X	X			X	X
79 27.90 Manufacture of other electrical equipment	0.3		X	X			X	X
80 28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	4.7	0.9	X	X			X	X
81 28.13 Manufacture of other pumps and compressors	0.0		X	X			X	X
82 28.15 Manufacture of bearings, gears, gearing and driving elements	1.0		X	X			X	X
83 28.21 Manufacture of ovens, furnaces and furnace burners	0.2	0.2	X	X			X	X
84 28.22 Manufacture of lifting and handling equipment	19.5		X	X			X	X
85 28.29 Manufacture of other general-purpose machinery n.e.c.	20.5	1.0	X	X			X	X
86 28.41 Manufacture of metal forming machinery	1.4	0.0	X	X	0.7	0.7	X	X
87 28.49 Manufacture of other machine tools	0.3		X	X			X	X
88 28.91 Manufacture of machinery for metallurgy	8.2	3.7	X	X			X	X

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Based on the CapEx KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
89 28.92 Manufacture of machinery for mining, quarrying and construction			X	X			X	X
90 28.93 Manufacture of machinery for food, beverage and tobacco processing	0.7	0.0	X	X			X	X
91 28.95 Manufacture of machinery for paper and paperboard production	45.2	12.1	X	X			X	X
92 28.99 Manufacture of other special-purpose machinery n.e.c.	3.3	0.7	X	X			X	X
93 29.10 Manufacture of motor vehicles	375.7	120.2	X	X	0.0	0.0	X	X
94 29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	14.9		X	X			X	X
95 30.11 Building of ships and floating structures	15.4		X	X			X	X
96 30.12 Building of pleasure and sporting boats			X	X			X	X
97 30.20 Manufacture of railway locomotives and rolling stock	71.0	39.2	X	X			X	X
98 30.40 Manufacture of military fighting vehicles	44.2		X	X			X	X
99 30.99 Manufacture of other transport equipment n.e.c.	10.4	0.1	X	X			X	X
100 31.09 Manufacture of other furniture	0.5		X	X			X	X
101 32.40 Manufacture of games and toys	0.2		X	X			X	X
102 32.50 Manufacture of medical and dental instruments and supplies	42.6	13.5	X	X			X	X
103 32.99 Other manufacturing n.e.c.	7.0	0.0	X	X			X	X
104 35.11 Production of electricity	3321.5	3090.3	X	X			X	X
105 35.12 Transmission of electricity			X	X			X	X
106 35.14 Trade of electricity			X	X			X	X

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Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
107	35.30 Steam and air conditioning supply	0.8		X	X			X	X
108	36.00 Water collection, treatment and supply	5.4	3.4	X	X			X	X
109	38.21 Treatment and disposal of non-hazardous waste	0.0		X	X			X	X
110	38.32 Recovery of sorted materials	0.5		X	X			X	X
111	39.00 Remediation activities and other waste management services			X	X			X	X
112	41.10 Development of building projects	57.8		X	X			X	X
113	41.20 Construction of residential and non-residential buildings	21.7	3.7	X	X	0.8	0.2	X	X
114	42.12 Construction of railways and underground railways	0.6		X	X			X	X
115	42.91 Construction of water projects			X	X			X	X
116	42.99 Construction of other civil engineering projects n.e.c.	17.0	2.6	X	X	0.3	0.1	X	X
117	43.21 Electrical installation	0.5		X	X			X	X
118	43.22 Plumbing, heat and air-conditioning installation	0.8	0.0	X	X			X	X
119	43.29 Other construction installation	38.5	9.6	X	X			X	X
120	43.33 Floor and wall covering	0.0		X	X			X	X
121	43.91 Roofing activities	0.1		X	X			X	X
122	43.99 Other specialised construction activities n.e.c.	10.2		X	X			X	X
123	45.11 Sale of cars and light motor vehicles	0.5		X	X			X	X
124	45.19 Sale of other motor vehicles	0.3		X	X			X	X
125	45.20 Maintenance and repair of motor vehicles	3.5		X	X			X	X
126	45.31 Wholesale trade of motor vehicle parts and accessories	8.0	8.0	X	X			X	X
127	45.32 Retail trade of motor vehicle parts and accessories			X	X			X	X
128	46.18 Agents specialised in the sale of other particular products	0.1		X	X			X	X

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Based on the CapEx KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
129 46.19 Agents involved in the sale of a variety of goods	0.1		X	X			X	X
130 46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	31.9	29.7	X	X			X	X
131 46.32 Wholesale of meat and meat products	0.2		X	X			X	X
132 46.39 Non-specialised wholesale of food, beverages and tobacco	13.4		X	X			X	X
133 46.41 Wholesale of textiles	0.1		X	X			X	X
134 46.43 Wholesale of electrical household appliances	1.2		X	X			X	X
135 46.45 Wholesale of perfume and cosmetics	0.7		X	X			X	X
136 46.46 Wholesale of pharmaceutical goods	0.0	0.0	X	X	0.0	0.0	X	X
137 46.49 Wholesale of other household goods	1.6		X	X			X	X
138 46.69 Wholesale of other machinery and equipment	4.6		X	X			X	X
139 46.71 Wholesale of solid, liquid and gaseous fuels and related products	5.4		X	X			X	X
140 46.72 Wholesale of metals and metal ores	0.2		X	X			X	X
141 46.73 Wholesale of wood, construction materials and sanitary equipment	1.9		X	X			X	X
142 46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.8		X	X			X	X
143 46.75 Wholesale of chemical products	2.5		X	X			X	X
144 46.76 Wholesale of other intermediate products			X	X			X	X

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		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
145	46.77 Wholesale of waste and scrap	0.0		X	X			X	X
146	46.90 Non-specialised wholesale trade	1.5	0.0	X	X			X	X
147	47.11 Retail sale in non- specialised stores with food, beverages or tobacco predominating	14.1	0.5	X	X			X	X
148	47.19 Other retail sale in non-specialised stores	0.2		X	X			X	X
149	47.22 Retail sale of meat and meat products in specialised stores	1.7		X	X			X	X
150	47.29 Other retail sale of food in specialised stores	11.6		X	X			X	X
151	47.30 Retail sale of automotive fuel in specialised stores	1.2		X	X			X	X
152	47.43 Retail sale of audio and video equipment in specialised stores	0.5		X	X			X	X
153	47.51 Retail sale of textiles in specialised stores	1.1		X	X			X	X
154	47.52 Retail sale of hardware, paints and glass in specialised stores	3.5		X	X			X	X
155	47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.1		X	X			X	X
156	47.71 Retail sale of clothing in specialised stores	0.0		X	X			X	X
157	47.72 Retail sale of footwear and leather goods in specialised stores	0.1		X	X			X	X
158	47.73 Dispensing chemist in specialised stores	1.1		X	X			X	X
159	47.78 Other retail sale of new goods in specialised stores	2.2		X	X			X	X
160	47.91 Retail sale via mail order houses or via Internet	4.6		X	X			X	X
161	47.99 Other retail sale not in stores, stalls or markets	0.1		X	X			X	X

		a	b	c	d	e	f	g	h
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
162	49.10 Passenger rail transport, interurban	160.2		X	X			X	X
163	49.39 Other passenger land transport n.e.c.	12.5	1.4	X	X			X	X
164	49.41 Freight transport by road			X	X			X	X
165	50.20 Sea and coastal freight water transport			X	X			X	X
166	51.10 Passenger air transport	62.3		X	X			X	X
167	52.21 Service activities incidental to land transportation	1.9		X	X			X	X
168	52.23 Service activities incidental to air transportation	348.6	61.7	X	X			X	X
169	52.29 Other transportation support activities	0.5		X	X			X	X
170	55.10 Hotels and similar accommodation	79.6		X	X			X	X
171	55.20 Holiday and other short-stay accommodation	1.1		X	X			X	X
172	56.10 Restaurants and mobile food service activities	0.2		X	X			X	X
173	56.21 Event catering activities	0.5		X	X			X	X
174	56.29 Other food service activities	0.8		X	X			X	X
175	58.13 Publishing of newspapers	0.0		X	X			X	X
176	58.19 Other publishing activities	0.4		X	X			X	X
177	59.11 Motion picture, video and television programme production activities			X	X			X	X
178	59.20 Sound recording and music publishing activities	0.0		X	X			X	X
179	60.20 Television programming and broadcasting activities	9.6	0.1	X	X	0.0	0.0	X	X
180	61.10 Wired telecommunications activities			X	X			X	X
181	61.20 Wireless telecommunications activities	0.1	0.0	X	X	0.1	0.0	X	X
182	61.90 Other telecommunications activities	15.8	0.2	X	X	3.1	0.0	X	X

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Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
183	62.01 Computer programming activities	0.0		X	X	0.0	0.0	X	X
184	62.02 Computer consultancy activities	20.2	10.5	X	X	4.9	4.9	X	X
185	62.03 Computer facilities management activities	16.8	0.1	X	X			X	X
186	62.09 Other information technology and computer service activities	37.5	3.1	X	X			X	X
187	63.11 Data processing, hosting and related activities	0.2		X	X			X	X
188	63.12 Web portals			X	X			X	X
189	64.19 Other monetary intermediation	1.7		X	X			X	X
190	64.20 Activities of holding companies			X	X			X	X
191	64.99 Other financial service activities, except insurance and pension funding n.e.c.	1.7		X	X			X	X
192	68.10 Buying and selling of own real estate	925.3		X	X			X	X
193	68.20 Renting and operating of own or leased real estate	5042.8	0.0	X	X			X	X
194	68.31 Real estate agencies	97.0		X	X			X	X
195	68.32 Management of real estate on a fee or contract basis	1326.5		X	X			X	X
196	69.10 Legal activities	0.9		X	X			X	X
197	69.20 Accounting, bookkeeping and auditing activities; tax consultancy			X	X			X	X
198	70.10 Activities of head offices	92.7	0.4	X	X			X	X
199	70.22 Business and other management consultancy activities	18.3		X	X			X	X
200	71.11 Architectural activities	1.0		X	X			X	X
201	71.12 Engineering activities and related technical consultancy	0.8		X	X			X	X



		a	b	c	d	e	f	g	h
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCM)	million €	Of which environmentally sustainable (CCA)	million €	Of which environmentally sustainable (CCA)
202	71.20 Technical testing and analysis	16.7		X	X			X	X
203	72.11 Research and experimental development on biotechnology			X	X			X	X
204	72.19 Other research and experimental development on natural sciences and engineering	3.5		X	X			X	X
205	73.11 Advertising agencies	3.2		X	X			X	X
206	73.12 Media representation	0.4		X	X			X	X
207	73.20 Market research and public opinion polling	0.0		X	X			X	X
208	74.10 Specialised design activities			X	X			X	X
209	74.90 Other professional, scientific and technical activities n.e.c.	65.8		X	X			X	X
210	75.00 Veterinary activities	5.8		X	X			X	X
211	77.11 Renting and leasing of cars and light motor vehicles	0.2		X	X			X	X
212	77.29 Renting and leasing of other personal and household goods	0.0		X	X			X	X
213	77.31 Renting and leasing of agricultural machinery and equipment	0.0		X	X			X	X
214	78.20 Temporary employment agency activities			X	X			X	X
215	79.12 Tour operator activities	29.4		X	X			X	X
216	80.10 Private security activities	1.5	0.0	X	X			X	X
217	81.22 Other building and industrial cleaning activities	0.2		X	X			X	X
218	81.30 Landscape service activities	0.4		X	X			X	X
219	82.91 Activities of collection agencies and credit bureaus	0.7		X	X			X	X

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	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
Based on the CapEx KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCA)	million €	Of which environ- mentally sustainable (CCA)
220 82.99 Other business support service activities n.e.c.	11.5		X	X			X	X
221 85.10 Pre-primary education	0.9		X	X			X	X
222 86.10 Hospital activities	0.5		X	X			X	X
223 86.21 General medical practice activities	0.0		X	X			X	X
224 86.22 Specialist medical practice activities	5.8		X	X			X	X
225 86.90 Other human health activities	0.6		X	X			X	X
226 87.10 Residential nursing care activities	0.1		X	X			X	X
227 87.90 Other residential care activities	1.5		X	X			X	X
228 90.02 Support activities to performing arts	0.1		X	X			X	X
229 92.00 Gambling and betting activities			X	X			X	X
230 93.11 Operation of sports facilities	0.7		X	X			X	X
231 93.21 Activities of amusement parks and theme parks	15.5		X	X			X	X
232 93.29 Other amusement and recreation activities	12.3		X	X			X	X
233 94.99 Activities of other membership organisations n.e.c.	4.7		X	X			X	X
234 96.01 Washing and (dry- )cleaning of textile and fur products	0.4		X	X			X	X
235 96.04 Physical well-being activities			X	X			X	X
236 96.09 Other personal service activities n.e.c.	100.6		X	X			X	X
...			X	X			X	X

		y	z	aa	ab
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	TOTAL (CCM + CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	01.29 Growing of other perennial crops	0.0		X	X
2	01.30 Plant propagation	0.2		X	X
3	01.50 Mixed farming	5.5		X	X
4	01.63 Post-harvest crop activities	3.5		X	X
5	02.40 Support services to forestry	0.2		X	X
6	06.10 Extraction of crude petroleum	8.7	6.9	X	X
7	07.29 Mining of other non-ferrous metal ores	7.3	0.0	X	X
8	08.91 Mining of chemical and fertiliser minerals	36.4		X	X
9	10.13 Production of meat and poultry meat products	0.1		X	X
10	10.39 Other processing and preserving of fruit and vegetables	2.8		X	X
11	10.51 Operation of dairies and cheese making			X	X
12	10.52 Manufacture of ice cream	0.3		X	X
13	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	1.3		X	X
14	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	0.0		X	X
15	10.82 Manufacture of cocoa, chocolate and sugar confectionery	0.0		X	X
16	10.85 Manufacture of prepared meals and dishes	0.0		X	X
17	10.89 Manufacture of other food products n.e.c.	0.0		X	X
18	11.01 Distilling, rectifying and blending of spirits	1.0		X	X
19	11.02 Manufacture of wine from grape	0.2		X	X
20	11.05 Manufacture of beer			X	X
21	13.92 Manufacture of made-up textile articles, except apparel	0.0		X	X
22	13.95 Manufacture of non-wovens and articles made from non-wovens, except apparel	0.0		X	X

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	TOTAL (CCM + CCA)			
Based on the CapEx KPI  Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
23 13.96 Manufacture of other technical and industrial textiles	0.0		X	X
24 13.99 Manufacture of other textiles n.e.c.			X	X
25 14.19 Manufacture of other wearing apparel and accessories	5.7		X	X
26 15.20 Manufacture of footwear	0.0		X	X
27 16.23 Manufacture of other builders' carpentry and joinery	0.0	0.0	X	X
28 16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.2		X	X
29 17.11 Manufacture of pulp	0.2	0.2	X	X
30 17.12 Manufacture of paper and paperboard	13.9	2.3	X	X
31 17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0.3	0.3	X	X
32 17.22 Manufacture of household and sanitary goods and of toilet requisites			X	X
33 17.24 Manufacture of wallpaper			X	X
34 17.29 Manufacture of other articles of paper and paperboard			X	X
35 18.12 Other printing	0.5		X	X
36 20.13 Manufacture of other inorganic basic chemicals	0.4	0.1	X	X
37 20.14 Manufacture of other organic basic chemicals	0.1		X	X
38 20.15 Manufacture of fertilisers and nitrogen compounds	0.4	0.0	X	X
39 20.16 Manufacture of plastics in primary forms	113.3	12.5	X	X
40 20.20 Manufacture of pesticides and other agrochemical products	0.5		X	X

		y	z	aa	ab
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	TOTAL (CCM + CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
41	20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.0		X	X
42	20.42 Manufacture of perfumes and toilet preparations	0.0		X	X
43	20.59 Manufacture of other chemical products n.e.c.	44.6	0.1	X	X
44	21.10 Manufacture of basic pharmaceutical products	6.4	0.0	X	X
45	21.20 Manufacture of pharmaceutical preparations	2.9		X	X
46	22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres			X	X
47	22.19 Manufacture of other rubber products	0.1	0.1	X	X
48	22.21 Manufacture of plastic plates, sheets, tubes and profiles	1.4		X	X
49	22.22 Manufacture of plastic packing goods	1.0		X	X
50	22.29 Manufacture of other plastic products	4.1		X	X
51	23.13 Manufacture of hollow glass	1.5	0.4	X	X
52	23.32 Manufacture of bricks, tiles and construction products, in baked clay	8.3	7	X	X
53	23.41 Manufacture of ceramic household and ornamental articles	0.0		X	X
54	23.51 Manufacture of cement	36.3	6.6	X	X
55	24.10 Manufacture of basic iron and steel and of ferro-alloys	18.0	12	X	X
56	24.42 Aluminium production	0.6		X	X
57	24.44 Copper production			X	X
58	24.45 Other non-ferrous metal production	26.4	26.4	X	X
59	24.53 Casting of light metals			X	X
60	25.11 Manufacture of metal structures and parts of structures	15.2		X	X

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	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the CapEx KPI  Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
61 25.12 Manufacture of doors and windows of metal			X	X
62 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	1.2		X	X
63 25.61 Treatment and coating of metals	0.7		X	X
64 25.71 Manufacture of cutlery			X	X
65 25.73 Manufacture of tools	0.1		X	X
66 25.99 Manufacture of other fabricated metal products n.e.c.	0.4		X	X
67 26.11 Manufacture of electronic components	274.3		X	X
68 26.20 Manufacture of computers and peripheral equipment	8.6		X	X
69 26.30 Manufacture of communication equipment	0.9		X	X
70 26.51 Manufacture of instruments and appliances for measuring, testing and navigation	10.1	0.5	X	X
71 26.70 Manufacture of optical instruments and photographic equipment	0.4	0.3	X	X
72 27.12 Manufacture of electricity distribution and control apparatus	49.8	43.9	X	X
73 27.20 Manufacture of batteries and accumulators	2.5		X	X
74 27.31 Manufacture of fibre optic cables	0.0	0.0	X	X
75 27.32 Manufacture of other electronic and electric wires and cables			X	X
76 27.40 Manufacture of electric lighting equipment	4.7	0.7	X	X

		y	z	aa	ab
		TOTAL (CCM + CCA)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
77	27.51 Manufacture of electric domestic appliances	0.5	0.5	X	X
78	27.52 Manufacture of non-electric domestic appliances	0.2		X	X
79	27.90 Manufacture of other electrical equipment	0.3		X	X
80	28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	4.7	0.9	X	X
81	28.13 Manufacture of other pumps and compressors	0.0		X	X
82	28.15 Manufacture of bearings, gears, gearing and driving elements	1.0		X	X
83	28.21 Manufacture of ovens, furnaces and furnace burners	0.2	0.2	X	X
84	28.22 Manufacture of lifting and handling equipment	19.5		X	X
85	28.29 Manufacture of other general-purpose machinery n.e.c.	20.5	1	X	X
86	28.41 Manufacture of metal forming machinery	2.0	0.7	X	X
87	28.49 Manufacture of other machine tools	0.3		X	X
88	28.91 Manufacture of machinery for metallurgy	8.2	3.7	X	X
89	28.92 Manufacture of machinery for mining, quarrying and construction			X	X
90	28.93 Manufacture of machinery for food, beverage and tobacco processing	0.7	0.0	X	X
91	28.95 Manufacture of machinery for paper and paperboard production	45.2	12.1	X	X
92	28.99 Manufacture of other special-purpose machinery n.e.c.	3.3	0.7	X	X

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	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the CapEx KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>				
93 29.10 Manufacture of motor vehicles	375.7	120.2	X	X
94 29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	14.9		X	X
95 30.11 Building of ships and floating structures	15.4		X	X
96 30.12 Building of pleasure and sporting boats			X	X
97 30.20 Manufacture of railway locomotives and rolling stock	71.0	39.2	X	X
98 30.40 Manufacture of military fighting vehicles	44.2		X	X
99 30.99 Manufacture of other transport equipment n.e.c.	10.4	0.1	X	X
100 31.09 Manufacture of other furniture	0.5		X	X
101 32.40 Manufacture of games and toys	0.2		X	X
102 32.50 Manufacture of medical and dental instruments and supplies	42.6	13.5	X	X
103 32.99 Other manufacturing n.e.c.	7.0	0.0	X	X
104 35.11 Production of electricity	3,321.5	3090.3	X	X
105 35.12 Transmission of electricity			X	X
106 35.14 Trade of electricity			X	X
107 35.30 Steam and air conditioning supply	0.8		X	X
108 36.00 Water collection, treatment and supply	5.4	3.4	X	X
109 38.21 Treatment and disposal of non-hazardous waste	0.0		X	X
110 38.32 Recovery of sorted materials	0.5		X	X
111 39.00 Remediation activities and other waste management services			X	X
112 41.10 Development of building projects	57.8		X	X
113 41.20 Construction of residential and non-residential buildings	22.6	3.9	X	X
114 42.12 Construction of railways and underground railways	0.6		X	X
115 42.91 Construction of water projects			X	X
116 42.99 Construction of other civil engineering projects n.e.c.	17.2	2.7	X	X
117 43.21 Electrical installation	0.5		X	X
118 43.22 Plumbing, heat and air-conditioning installation	0.8	0.0	X	X



	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the CapEx KPI	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
119 43.29 Other construction installation	38.5	9.6	X	X
120 43.33 Floor and wall covering	0.0		X	X
121 43.91 Roofing activities	0.1		X	X
122 43.99 Other specialised construction activities n.e.c.	10.2		X	X
123 45.11 Sale of cars and light motor vehicles	0.5		X	X
124 45.19 Sale of other motor vehicles	0.3		X	X
125 45.20 Maintenance and repair of motor vehicles	3.5		X	X
126 45.31 Wholesale trade of motor vehicle parts and accessories	8.0	8	X	X
127 45.32 Retail trade of motor vehicle parts and accessories			X	X
128 46.18 Agents specialised in the sale of other particular products	0.1		X	X
129 46.19 Agents involved in the sale of a variety of goods	0.1		X	X
130 46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	31.9	29.7	X	X
131 46.32 Wholesale of meat and meat products	0.2		X	X
132 46.39 Non-specialised wholesale of food, beverages and tobacco	13.4		X	X
133 46.41 Wholesale of textiles	0.1		X	X
134 46.43 Wholesale of electrical household appliances	1.2		X	X
135 46.45 Wholesale of perfume and cosmetics	0.7		X	X
136 46.46 Wholesale of pharmaceutical goods	0.0	0.0	X	X

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		y	z	aa	ab
		TOTAL (CCM + CCA)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
137	46.49 Wholesale of other household goods	1.6		X	X
138	46.69 Wholesale of other machinery and equipment	4.6		X	X
139	46.71 Wholesale of solid, liquid and gaseous fuels and related products	5.4		X	X
140	46.72 Wholesale of metals and metal ores	0.2		X	X
141	46.73 Wholesale of wood, construction materials and sanitary equipment	1.9		X	X
142	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.8		X	X
143	46.75 Wholesale of chemical products	2.5		X	X
144	46.76 Wholesale of other intermediate products			X	X
145	46.77 Wholesale of waste and scrap	0.0		X	X
146	46.90 Non-specialised wholesale trade	1.5	0.0	X	X
147	47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	14.1	0.5	X	X
148	47.19 Other retail sale in non-specialised stores	0.2		X	X
149	47.22 Retail sale of meat and meat products in specialised stores	1.7		X	X
150	47.29 Other retail sale of food in specialised stores	11.6		X	X
151	47.30 Retail sale of automotive fuel in specialised stores	1.2		X	X
152	47.43 Retail sale of audio and video equipment in specialised stores	0.5		X	X
153	47.51 Retail sale of textiles in specialised stores	1.1		X	X
154	47.52 Retail sale of hardware, paints and glass in specialised stores	3.5		X	X

		y	z	aa	ab
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	TOTAL (CCM + CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
155	47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.1		X	X
156	47.71 Retail sale of clothing in specialised stores	0.0		X	X
157	47.72 Retail sale of footwear and leather goods in specialised stores	0.1		X	X
158	47.73 Dispensing chemist in specialised stores	1.1		X	X
159	47.78 Other retail sale of new goods in specialised stores	2.2		X	X
160	47.91 Retail sale via mail order houses or via Internet	4.6		X	X
161	47.99 Other retail sale not in stores, stalls or markets	0.1		X	X
162	49.10 Passenger rail transport, interurban	160.2		X	X
163	49.39 Other passenger land transport n.e.c.	12.5	1.4	X	X
164	49.41 Freight transport by road			X	X
165	50.20 Sea and coastal freight water transport			X	X
166	51.10 Passenger air transport	62.3		X	X
167	52.21 Service activities incidental to land transportation	1.9		X	X
168	52.23 Service activities incidental to air transportation	348.6	61.7	X	X
169	52.29 Other transportation support activities	0.5		X	X
170	55.10 Hotels and similar accommodation	79.6		X	X
171	55.20 Holiday and other short-stay accommodation	1.1		X	X
172	56.10 Restaurants and mobile food service activities	0.2		X	X
173	56.21 Event catering activities	0.5		X	X
174	56.29 Other food service activities	0.8		X	X
175	58.13 Publishing of newspapers	0.0		X	X

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	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the CapEx KPI  Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
176 58.19 Other publishing activities	0.4		X	X
177 59.11 Motion picture, video and television programme production activities			X	X
178 59.20 Sound recording and music publishing activities	0.0		X	X
179 60.20 Television programming and broadcasting activities	9.6	0.1	X	X
180 61.10 Wired telecommunications activities			X	X
181 61.20 Wireless telecommunications activities	0.2	0.0	X	X
182 61.90 Other telecommunications activities	18.9	0.2	X	X
183 62.01 Computer programming activities	0.0	0.0	X	X
184 62.02 Computer consultancy activities	25.1	15.5	X	X
185 62.03 Computer facilities management activities	16.8	0.1	X	X
186 62.09 Other information technology and computer service activities	37.5	3.1	X	X
187 63.11 Data processing, hosting and related activities	0.2		X	X
188 63.12 Web portals			X	X
189 64.19 Other monetary intermediation	1.7		X	X
190 64.20 Activities of holding companies			X	X
191 64.99 Other financial service activities, except insurance and pension funding n.e.c.	1.7		X	X
192 68.10 Buying and selling of own real estate	925.3		X	X
193 68.20 Renting and operating of own or leased real estate	5,042.8	0.0	X	X
194 68.31 Real estate agencies	97.0		X	X
195 68.32 Management of real estate on a fee or contract basis	1,326.5		X	X

		y	z	aa	ab
		TOTAL (CCM + CCA)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
196	69.10 Legal activities	0.9		X	X
197	69.20 Accounting, bookkeeping and auditing activities; tax consultancy			X	X
198	70.10 Activities of head offices	92.7	0.4	X	X
199	70.22 Business and other management consultancy activities	18.3		X	X
200	71.11 Architectural activities	1.0		X	X
201	71.12 Engineering activities and related technical consultancy	0.8		X	X
202	71.20 Technical testing and analysis	16.7		X	X
203	72.11 Research and experimental development on biotechnology			X	X
204	72.19 Other research and experimental development on natural sciences and engineering	3.5		X	X
205	73.11 Advertising agencies	3.2		X	X
206	73.12 Media representation	0.4		X	X
207	73.20 Market research and public opinion polling	0.0		X	X
208	74.10 Specialised design activities			X	X
209	74.90 Other professional, scientific and technical activities n.e.c.	65.8		X	X
210	75.00 Veterinary activities	5.8		X	X
211	77.11 Renting and leasing of cars and light motor vehicles	0.2		X	X
212	77.29 Renting and leasing of other personal and household goods	0.0		X	X
213	77.31 Renting and leasing of agricultural machinery and equipment	0.0		X	X
214	78.20 Temporary employment agency activities			X	X
215	79.12 Tour operator activities	29.4		X	X
216	80.10 Private security activities	1.5	0.0	X	X

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	y	z	aa	ab
	TOTAL (CCM + CCA)			
Based on the CapEx KPI  Breakdown by sector - NACE 4 digits level (code and label) <sup>1)</sup>	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
217 81.22 Other building and industrial cleaning activities	0.2		X	X
218 81.30 Landscape service activities	0.4		X	X
219 82.91 Activities of collection agencies and credit bureaus	0.7		X	X
220 82.99 Other business support service activities n.e.c.	11.5		X	X
221 85.10 Pre-primary education	0.9		X	X
222 86.10 Hospital activities	0.5		X	X
223 86.21 General medical practice activities	0.0		X	X
224 86.22 Specialist medical practice activities	5.8		X	X
225 86.90 Other human health activities	0.6		X	X
226 87.10 Residential nursing care activities	0.1		X	X
227 87.90 Other residential care activities	1.5		X	X
228 90.02 Support activities to performing arts	0.1		X	X
229 92.00 Gambling and betting activities			X	X
230 93.11 Operation of sports facilities	0.7		X	X
231 93.21 Activities of amusement parks and theme parks	15.5		X	X
232 93.29 Other amusement and recreation activities	12.3		X	X
233 94.99 Activities of other membership organisations n.e.c.	4.7		X	X
234 96.01 Washing and (dry- )cleaning of textile and fur products	0.4		X	X
235 96.04 Physical well-being activities			X	X
236 96.09 Other personal service activities n.e.c.	100.6		X	X
...			X	X

<sup>1)</sup> Only sectors/NACE codes with an exposure (gross carrying amount) greater than 0 are shown in the template.

## 3. GAR KPI stock (based on the Turnover KPI)

	a	b	c	d	e	f	g	h	i
Disclosure reference date T									
Based on the Turnover KPI	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	% (compared to total covered assets in the denominator) <sup>2)</sup>			Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
							Of which Use of Proceeds	Of which enabling	
	GAR - Covered assets in both numerator and denominator	X	X	X	X	X			X
	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation								
1	35.1	2.3	2.3	0	0	0	0		0
2	Financial undertakings	1.1	0	0	0	0			
3	Credit institutions	0.8							
4	Loans and advances	0.4							
5	Debt securities, including UoP <sup>1)</sup>	0.3							
6	Equity instruments			X				X	
7	Other financial corporations	0.3	0	0	0	0			
8	of which investment firms								
9	Loans and advances								
10	Debt securities, including UoP <sup>1)</sup>								
11	Equity instruments			X				X	
12	of which management companies	0							
13	Loans and advances	0							
14	Debt securities, including UoP <sup>1)</sup>								
15	Equity instruments			X				X	
16	of which insurance undertakings	0							
17	Loans and advances	0							
18	Debt securities, including UoP <sup>1)</sup>								
19	Equity instruments			X				X	
20	Non-financial undertakings	3.5	0.9	0.8	0	0	0	0	0
21	Loans and advances	3.4	0.9	0.8	0	0	0	0	0
22	Debt securities, including UoP <sup>1)</sup>	0.1	0		0	0	0	0	0
23	Equity instruments			X					
24	Households	30.6	1.5	1.5					
	of which loans collateralised by residential immovable property	27.9	1.3	1.3					
26	of which building renovation loans	1							
27	of which motor vehicle loans	0				X	X	X	X
28	Local governments financing	0							
29	Housing financing								
30	Other local government financing	0							
	Collateral obtained by taking possession: residential and commercial immovable properties								
31									
32	Total GAR assets	35.1	2.3	2.3	0	0	0	0	0

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.

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	aa	ab	ac	ad	ae	af
<b>Disclosure reference date T</b>						
<b>Based on the Turnover KPI</b>	<b>TOTAL (CCM + CCA)</b>					
	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)</b>					
	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)</b>					
<b>% (compared to total covered assets in the denominator)<sup>2)</sup></b>			<b>Of which Use of Proceeds</b>	<b>Of which transitional</b>	<b>Of which enabling</b>	<b>Proportion of total assets covered</b>
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	35.1	2.3	2.3	0	0	33
<b>2 Financial undertakings</b>	<b>1.1</b>	<b>0</b>	<b>0</b>		<b>0</b>	<b>3.6</b>
3 Credit institutions	0.8					3.2
4 Loans and advances	0.4					1.9
5 Debt securities, including UoP <sup>1)</sup>	0.3					1.3
6 Equity instruments			X			
7 Other financial corporations	0.3	0	0		0	0.4
8 of which investment firms						0
9 Loans and advances						0
10 Debt securities, including UoP <sup>1)</sup>						
11 Equity instruments			X			
12 of which management companies	0					0.1
13 Loans and advances	0					0.1
14 Debt securities, including UoP <sup>1)</sup>						0
15 Equity instruments			X			
16 of which insurance undertakings	0					0
17 Loans and advances	0					0
18 Debt securities, including UoP <sup>1)</sup>						
19 Equity instruments			X			
<b>20 Non-financial undertakings</b>	<b>3.5</b>	<b>0.9</b>	<b>0.8</b>	<b>0</b>	<b>0</b>	<b>3.6</b>
21 Loans and advances	3.4	0.9	0.8	0	0	3.5
22 Debt securities, including UoP <sup>1)</sup>	0.1	0		0	0	0.2
23 Equity instruments			X			
<b>24 Households</b>	<b>30.6</b>	<b>1.5</b>	<b>1.5</b>			<b>24.1</b>
25 of which loans collateralised by residential immovable property	27.9	1.3	1.3			19.9
26 of which building renovation loans	1					0.7
27 of which motor vehicle loans	0					0.1
<b>28 Local governments financing</b>	<b>0</b>					<b>1.6</b>
29 Housing financing						
30 Other local government financing	0					1.6
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>						
<b>32 Total GAR assets</b>	<b>35.1</b>	<b>2.3</b>	<b>2.3</b>	<b>0</b>	<b>0</b>	<b>69.2</b>

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.



	ag	ah	ai	aj	ak	al	am	an	ao
Disclosure reference date T-1	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
% (compared to total covered assets in the denominator) <sup>2)</sup>	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>	X	X	X	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation									
1									
<b>2 Financial undertakings</b>									
3 Credit institutions									
4 Loans and advances									
5 Debt securities, including UoP <sup>1)</sup>									
6 Equity instruments			X					X	
7 Other financial corporations									
8 of which investment firms									
9 Loans and advances									
10 Debt securities, including UoP <sup>1)</sup>									
11 Equity instruments			X					X	
12 of which management companies									
13 Loans and advances									
14 Debt securities, including UoP <sup>1)</sup>									
15 Equity instruments			X					X	
16 of which insurance undertakings									
17 Loans and advances									
18 Debt securities, including UoP <sup>1)</sup>									
19 Equity instruments			X					X	
<b>20 Non-financial undertakings</b>									
21 Loans and advances									
22 Debt securities, including UoP <sup>1)</sup>									
23 Equity instruments			X					X	
<b>24 Households</b>									
of which loans collateralised by residential immovable property									
25 of which building renovation loans									
26 of which motor vehicle loans						X	X	X	X
<b>28 Local governments financing</b>									
29 Housing financing									
30 Other local government financing									
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>									
<b>32 Total GAR assets</b>									

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.

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	bf	bg	bh	bi	bj	bk
<b>Disclosure reference date T-1</b>						
<b>Based on the Turnover KPI</b>	<b>TOTAL (CCM + CCA)</b>					
	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)</b>					
	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)</b>					
<b>% (compared to total covered assets in the denominator)<sup>2)</sup></b>			<b>Of which Use of Proceeds</b>	<b>Of which transi-tional</b>	<b>Of which enabling</b>	<b>Proportion of total assets covered</b>
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation						
<b>1</b>						
<b>2 Financial undertakings</b>						
<b>3</b> Credit institutions						
<b>4</b> Loans and advances						
<b>5</b> Debt securities, including UoP <sup>1)</sup>						
<b>6</b> Equity instruments			X			
<b>7</b> Other financial corporations						
<b>8</b> of which investment firms						
<b>9</b> Loans and advances						
<b>10</b> Debt securities, including UoP <sup>1)</sup>						
<b>11</b> Equity instruments			X			
<b>12</b> of which management companies						
<b>13</b> Loans and advances						
<b>14</b> Debt securities, including UoP <sup>1)</sup>						
<b>15</b> Equity instruments			X			
<b>16</b> of which insurance undertakings						
<b>17</b> Loans and advances						
<b>18</b> Debt securities, including UoP <sup>1)</sup>						
<b>19</b> Equity instruments			X			
<b>20 Non-financial undertakings</b>						
<b>21</b> Loans and advances						
<b>22</b> Debt securities, including UoP <sup>1)</sup>						
<b>23</b> Equity instruments			X			
<b>24 Households</b>						
<b>25</b> of which loans collateralised by residential immovable property						
<b>26</b> of which building renovation loans						
<b>27</b> of which motor vehicle loans						
<b>28 Local governments financing</b>						
<b>29</b> Housing financing						
<b>30</b> Other local government financing						
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>						
<b>32 Total GAR assets</b>						

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.

## 3. GAR KPI stock (based on the Cap Ex-KPI)

	a	b	c	d	e	f	g	h	i
Disclosure reference date T									
Based on the CapEx KPI	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	% (compared to total covered assets in the denominator) <sup>2)</sup>					% (compared to total covered assets in the denominator) <sup>2)</sup>			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	35.3	2.4	2.3	0	0.1	0	0		0
<b>1 Financial undertakings</b>	<b>1.1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
3 Credit institutions	0.8								
4 Loans and advances	0.4								
5 Debt securities, including UoP <sup>1)</sup>	0.3								
6 Equity instruments			X					X	
7 Other financial corporations	0.3	0	0	0	0	0			
8 of which investment firms	0								
9 Loans and advances	0								
10 Debt securities, including UoP <sup>1)</sup>									
11 Equity instruments			X					X	
12 of which management companies	0								
13 Loans and advances	0								
14 Debt securities, including UoP <sup>1)</sup>									
15 Equity instruments			X					X	
16 of which insurance undertakings	0								
17 Loans and advances	0								
18 Debt securities, including UoP <sup>1)</sup>									
19 Equity instruments			X					X	
<b>20 Non-financial undertakings</b>	<b>3.6</b>	<b>0.9</b>	<b>0.8</b>	<b>0</b>	<b>0.1</b>	<b>0</b>	<b>0</b>		<b>0</b>
21 Loans and advances	3.5	0.9	0.8	0	0.1	0	0		0
22 Debt securities, including UoP <sup>1)</sup>	0.1	0		0	0	0	0		0
23 Equity instruments			X						
<b>24 Households</b>	<b>30.6</b>	<b>1.5</b>	<b>1.5</b>						
25 of which loans collateralised by residential immovable property	27.9	1.3	1.3						
26 of which building renovation loans	1.0								
27 of which motor vehicle loans	0					X	X	X	X
<b>28 Local governments financing</b>	<b>0</b>								
29 Housing financing									
30 Other local government financing	0								
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>									
<b>32 Total GAR assets</b>	<b>35.3</b>	<b>2.4</b>	<b>2.3</b>	<b>0</b>	<b>0.1</b>	<b>0</b>	<b>0</b>		<b>0</b>

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.

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	aa	ab	ac	ad	ae	af
<b>Disclosure reference date T</b>						
<b>Based on the CapEx KPI</b>	<b>TOTAL (CCM + CCA)</b>					
<b>% (compared to total covered assets in the denominator)<sup>2)</sup></b>	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)</b>					
		<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)</b>				
			<b>Of which Use of Proceeds</b>	<b>Of which transi-tional</b>	<b>Of which enabling</b>	<b>Proportion of total assets covered</b>
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	35.3	2.4	2.3	0	0.1	33
<b>2 Financial undertakings</b>	<b>1.1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3.6</b>
3 Credit institutions	0.8					3.2
4 Loans and advances	0.4					1.9
5 Debt securities, including UoP <sup>1)</sup>	0.3					1.3
6 Equity instruments			X			
7 Other financial corporations	0.3	0	0	0	0	0.4
8 of which investment firms	0					0
9 Loans and advances	0					0
10 Debt securities, including UoP <sup>1)</sup>						
11 Equity instruments			X			
12 of which management companies	0					0.1
13 Loans and advances	0					0.1
14 Debt securities, including UoP <sup>1)</sup>						0
15 Equity instruments			X			
16 of which insurance undertakings	0					0
17 Loans and advances	0					0
18 Debt securities, including UoP <sup>1)</sup>						
19 Equity instruments			X			
<b>20 Non-financial undertakings</b>	<b>3.6</b>	<b>1</b>	<b>0.8</b>	<b>0</b>	<b>0.1</b>	<b>3.6</b>
21 Loans and advances	3.6	0.9	0.8	0	0.1	3.5
22 Debt securities, including UoP <sup>1)</sup>	0.1	0		0	0	0.2
23 Equity instruments			X			
<b>24 Households</b>	<b>30.6</b>	<b>1.5</b>	<b>1.5</b>			<b>24.1</b>
25 of which loans collateralised by residential immovable property	27.9	1.3	1.3			19.9
26 of which building renovation loans	1					0.7
27 of which motor vehicle loans	0					0.1
<b>28 Local governments financing</b>	<b>0</b>					<b>1.6</b>
29 Housing financing						
30 Other local government financing	0					1.6
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>						
<b>32 Total GAR assets</b>	<b>35.3</b>	<b>2.4</b>	<b>2.3</b>	<b>0</b>	<b>0.1</b>	<b>69.2</b>

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.

	ag	ah	ai	aj	ak	al	am	an	ao
Disclosure reference date T-1	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
Based on the CapEx KPI	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total covered assets in the denominator) <sup>2)</sup>		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional			Of which specialised lending	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>	X	X	X	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation									
1									
<b>2 Financial undertakings</b>									
3 Credit institutions									
4 Loans and advances									
5 Debt securities, including UoP <sup>1)</sup>									
6 Equity instruments			X					X	
7 Other financial corporations									
8 of which investment firms									
9 Loans and advances									
10 Debt securities, including UoP <sup>1)</sup>									
11 Equity instruments			X					X	
12 of which management companies									
13 Loans and advances									
14 Debt securities, including UoP <sup>1)</sup>									
15 Equity instruments			X					X	
16 of which insurance undertakings									
17 Loans and advances									
18 Debt securities, including UoP <sup>1)</sup>									
19 Equity instruments			X					X	
<b>20 Non-financial undertakings</b>									
21 Loans and advances									
22 Debt securities, including UoP <sup>1)</sup>									
23 Equity instruments			X					X	
<b>24 Households</b>									
of which loans collateralised by residential immovable property									
25 of which building renovation loans									
26 of which motor vehicle loans						X	X	X	X
<b>28 Local governments financing</b>									
29 Housing financing									
30 Other local government financing									
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>									
<b>32 Total GAR assets</b>									

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.

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	bf	bg	bh	bi	bj	bk
<b>Disclosure reference date T-1</b>						
<b>Based on the CapEx KPI</b>	<b>TOTAL (CCM + CCA)</b>					
	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)</b>					
	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)</b>					
<b>% (compared to total covered assets in the denominator)<sup>2)</sup></b>			<b>Of which Use of Proceeds</b>	<b>Of which transi-tional</b>	<b>Of which enabling</b>	<b>Proportion of total assets covered</b>
<b>GAR - Covered assets in both numerator and denominator</b>	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation						
<b>1</b>						
<b>2 Financial undertakings</b>						
<b>3 Credit institutions</b>						
<b>4 Loans and advances</b>						
<b>5 Debt securities, including UoP<sup>1)</sup></b>						
<b>6 Equity instruments</b>			X			
<b>7 Other financial corporations</b>						
<b>8 of which investment firms</b>						
<b>9 Loans and advances</b>						
<b>10 Debt securities, including UoP<sup>1)</sup></b>						
<b>11 Equity instruments</b>			X			
<b>12 of which management companies</b>						
<b>13 Loans and advances</b>						
<b>14 Debt securities, including UoP<sup>1)</sup></b>						
<b>15 Equity instruments</b>			X			
<b>16 of which insurance undertakings</b>						
<b>17 Loans and advances</b>						
<b>18 Debt securities, including UoP<sup>1)</sup></b>						
<b>19 Equity instruments</b>			X			
<b>20 Non-financial undertakings</b>						
<b>21 Loans and advances</b>						
<b>22 Debt securities, including UoP<sup>1)</sup></b>						
<b>23 Equity instruments</b>			X			
<b>24 Households</b>						
<b>25 of which loans collateralised by residential immovable property</b>						
<b>26 of which building renovation loans</b>						
<b>27 of which motor vehicle loans</b>						
<b>28 Local governments financing</b>						
<b>29 Housing financing</b>						
<b>30 Other local government financing</b>						
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>						
<b>32 Total GAR assets</b>						

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (see template 1: Assets for calculating GAR) are set in relation to the total GAR assets.

## 4. GAR KPI flow (based on the Turnover KPI)

	a	b	c	d	e	f	g	h	i
Disclosure reference date T	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)					
Based on the Turnover KPI	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to flow of total eligible assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
		Of which Use of Proceeds	Of which transitional	Of which enabling				Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.3	0.8	0.7	0	0	0	0		0
<b>2 Financial undertakings</b>	<b>0.1</b>								
3 Credit institutions	0								
4 Loans and advances	0								
5 Debt securities, including UoP <sup>1)</sup>	0								
6 Equity instruments			X						X
7 Other financial corporations	0								
8 of which investment firms									
9 Loans and advances									
10 Debt securities, including UoP <sup>1)</sup>									
11 Equity instruments			X						X
of which management companies	0								
13 Loans and advances	0								
14 Debt securities, including UoP <sup>1)</sup>									
15 Equity instruments			X						X
of which insurance undertakings	0								
17 Loans and advances	0								
18 Debt securities, including UoP <sup>1)</sup>									
19 Equity instruments			X						X
<b>20 Non-financial undertakings</b>	<b>0.9</b>	<b>0.2</b>	<b>0.2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		<b>0</b>
21 Loans and advances	0.9	0.2	0.2	0	0	0	0		0
22 Debt securities, including UoP <sup>1)</sup>	0	0		0	0				
23 Equity instruments			X						X
<b>24 Households</b>	<b>4.4</b>	<b>0.5</b>	<b>0.5</b>						
of which loans collateralised by residential immovable property	3.5	0.4	0.4						
26 of which building renovation loans	0.2								
27 of which motor vehicle loans	0					X	X	X	X
<b>28 Local governments financing</b>	<b>0</b>								
29 Housing financing									
30 Other local government financing	0								
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>									
<b>32 Total GAR assets</b>	<b>5.3</b>	<b>0.8</b>	<b>0.7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		<b>0</b>

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (new business in euro) are set in relation to the total GAR assets.

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	aa	ab	ac	ad	ae	af
Disclosure reference date T						
Based on the Turnover KPI	TOTAL (CCM + CCA)				Proportion of total assets covered	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of total eligible assets)			Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.3	0.8	0.7	0	0	6.7
1 Financial undertakings	0.1					0.6
3 Credit institutions	0					0.5
4 Loans and advances	0					0.1
5 Debt securities, including UoP <sup>1)</sup>	0					0.5
6 Equity instruments			X			
7 Other financial corporations	0					0.1
8 of which investment firms						0
9 Loans and advances						0
10 Debt securities, including UoP <sup>1)</sup>						
11 Equity instruments			X			
12 of which management companies	0					0
13 Loans and advances	0					0
14 Debt securities, including UoP <sup>1)</sup>						0
15 Equity instruments			X			
16 of which insurance undertakings	0					0
17 Loans and advances	0					0
18 Debt securities, including UoP <sup>1)</sup>						
19 Equity instruments			X			
20 Non-financial undertakings	0.9	0.2	0.2	0	0	1.4
21 Loans and advances	0.9	0.2	0.2	0	0	1.3
22 Debt securities, including UoP <sup>1)</sup>	0	0		0	0	0.1
23 Equity instruments			X			
24 Households	4.4	0.5	0.5			3.9
25 of which loans collateralised by residential immovable property	3.5	0.4	0.4			2.5
26 of which building renovation loans	0.2					0.1
27 of which motor vehicle loans	0					0
28 Local governments financing	0					0.9
29 Housing financing						
30 Other local government financing	0					0.9
Collateral obtained by taking possession: residential and commercial immovable properties						
31						
32 Total GAR assets	5.3	0.8	0.7	0	0	0

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (new business in euro) are set in relation to the total GAR assets.



## 4. GAR KPI flow (based on the Cap Ex-KPI)

	a	b	c	d	e	f	g	h	i
Disclosure reference date T									
Based on the CapEx KPI	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	% (compared to flow of total eligible assets)					% (compared to flow of total eligible assets)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.4	0.8	0.7	0	0	0	0		0
<b>1 Financial undertakings</b>	<b>0.1</b>	<b>0</b>		<b>0</b>					
3 Credit institutions	0								
4 Loans and advances	0								
5 Debt securities, including UoP <sup>1)</sup>	0								
6 Equity instruments			X					X	
7 Other financial corporations	0	0		0					
8 of which investment firms	0								
9 Loans and advances	0								
10 Debt securities, including UoP <sup>1)</sup>									
11 Equity instruments			X					X	
of which management companies	0								
13 Loans and advances	0								
14 Debt securities, including UoP <sup>1)</sup>									
15 Equity instruments			X					X	
of which insurance undertakings	0								
17 Loans and advances	0								
18 Debt securities, including UoP <sup>1)</sup>									
19 Equity instruments			X					X	
<b>20 Non-financial undertakings</b>	<b>1</b>	<b>0.3</b>	<b>0.2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		<b>0</b>
21 Loans and advances	1	0.2	0.2	0	0	0	0		0
22 Debt securities, including UoP <sup>1)</sup>	0	0		0	0				
23 Equity instruments			X					X	
<b>24 Households</b>	<b>4.4</b>	<b>0.5</b>	<b>0.5</b>						
of which loans collateralised by residential immovable property	3.5	0.4	0.4						
26 of which building renovation loans	0.2								
27 of which motor vehicle loans	0					X	X	X	X
<b>28 Local governments financing</b>	<b>0</b>								
29 Housing financing									
30 Other local government financing	0								
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>									
<b>31</b>									
<b>32 Total GAR assets</b>	<b>5.4</b>	<b>0.8</b>	<b>0.7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		<b>0</b>

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (new business in euro) are set in relation to the total GAR assets.

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	aa	ab	ac	ad	ae	af
Disclosure reference date T						
Based on the CapEx KPI	TOTAL (CCM + CCA)				Proportion of total assets covered	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of total eligible assets)			Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.4	0.8	0.7	0	0	6.7
2 Financial undertakings	0.1	0		0		0.6
3 Credit institutions	0					0.5
4 Loans and advances	0					0.1
5 Debt securities, including UoP <sup>1)</sup>	0					0.5
6 Equity instruments			X			
7 Other financial corporations	0	0		0		0.1
8 of which investment firms	0					0
9 Loans and advances	0					0
10 Debt securities, including UoP <sup>1)</sup>						
11 Equity instruments			X			
12 of which management companies	0					0
13 Loans and advances	0					0
14 Debt securities, including UoP <sup>1)</sup>						0
15 Equity instruments			X			
16 of which insurance undertakings	0					0
17 Loans and advances	0					0
18 Debt securities, including UoP <sup>1)</sup>						
19 Equity instruments			X			
20 Non-financial undertakings	1	0.3	0.2	0	0	1.4
21 Loans and advances	1	0.2	0.2	0	0	1.3
22 Debt securities, including UoP <sup>1)</sup>	0	0		0	0	0.1
23 Equity instruments			X			
24 Households	4.4	0.5	0.5			3.9
25 of which loans collateralised by residential immovable property	3.5	0.4	0.4			2.5
26 of which building renovation loans	0.2					0.1
27 of which motor vehicle loans	0					0
28 Local governments financing	0					0.9
29 Housing financing						
30 Other local government financing	0					0.9
Collateral obtained by taking possession: residential and commercial immovable properties						
31						
32 Total GAR assets	5.4	0.8	0.7	0	0	0

<sup>1)</sup> UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.

<sup>2)</sup> Based on own assumption: In each cell, the respective assets in euro (new business in euro) are set in relation to the total GAR assets.

## 5. KPI off-balance sheet exposures (based on the Turnover KPI)

		a	b	c	d	e	f	g	h	i
Disclosure reference date T		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
Stock KPI - based on the Turnover KPI	% (compared to total eligible off-balance sheet assets)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	1.2	0		0	0				
2	Assets under management (AuM KPI)	46.5	6		0	0.3	0	0		0

		aa	ab	ac	ad	ae
Disclosure reference date T		TOTAL (CCM + CCA)				
Stock KPI - based on the Turnover KPI	% (compared to total eligible off-balance sheet assets)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	1.2	0		0	0
2	Assets under management (AuM KPI)	46.6	6		0	0.3

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## 5. KPI off-balance sheet exposures (based on the Cap Ex-KPI)

	a	b	c	d	e	f	g	h	i
Disclosure reference date T	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
Stock KPI - based on the CapEx KPI	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	% (compared to total eligible off-balance sheet assets)				% (compared to total eligible off-balance sheet assets)				
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling	
1 Financial guarantees (FinGuar KPI)	1.4	0.1		0	0.1				
2 Assets under management (AuM KPI)	46.7	6.9		0	0.7	0	0		0

	aa	ab	ac	ad	ae
Disclosure reference date T	TOTAL (CCM + CCA)				
Stock KPI - based on the CapEx KPI	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	% (compared to total eligible off-balance sheet assets)				
		Of which Use of Proceeds	Of which transitional	Of which enabling	
1 Financial guarantees (FinGuar KPI)	1.4	0.1		0	0.1
2 Assets under management (AuM KPI)	46.7	6.9		0	0.7

## Nuclear and fossil gas related activities

Row	Activities	YES/NO
<b>Nuclear energy related activities</b>		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes
<b>Fossil gas related activities</b>		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

## 2.1. Taxonomy-aligned economic activities (denominator) – based on the Turnover KPI

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount (million €)	%	Amount (million €)	%	Amount (million €)	%
1.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
2.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0	0	0.0		
3.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0.0	6	0.0		
4.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
5.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0	0	0.0		
6.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0	0	0.0		
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>8,715</b>	<b>2.3</b>	<b>8,706</b>	<b>2.3</b>	<b>8</b>	<b>0.0</b>
8.	<b>Total applicable KPI</b>	<b>8,721</b>	<b>2.3</b>	<b>8,713</b>	<b>2.3</b>	<b>8</b>	<b>0.0</b>

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## 2.2 Taxonomy-aligned economic activities (denominator) – based on the CapEx-KPI

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount (million €)	%	Amount (million €)	%	Amount (million €)	%
1.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
2.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0	1	0.0		
3.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	11	0.0	11	0.0		
4.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0	1	0.0		
5.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0	1	0.0		
6.	Amount and proportion of taxonomyaligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0	0	0.0		
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>9,026</b>	<b>2.4</b>	<b>9,020</b>	<b>2.4</b>	<b>6</b>	<b>0.0</b>
8.	<b>Total applicable KPI</b>	<b>9,040</b>	<b>2.4</b>	<b>9,034</b>	<b>2.4</b>	<b>6</b>	<b>0.0</b>

### 3.1 Taxonomy-aligned economic activities (numerator) – based on the Turnover KPI

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount (million €)	%	Amount (million €)	%	Amount (million €)	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI						
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0	0	0.0		
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0.1	6	0.1		
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI						
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0	0	0.0		
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0	0	0.0		
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	<b>8,715</b>	<b>99.9</b>	<b>8,706</b>	<b>99.9</b>	<b>8</b>	<b>100.0</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>8,721</b>	<b>100.0</b>	<b>8,713</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>

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### 3.2 Taxonomy-aligned economic activities (numerator) – based on the CapEx-KPI

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount (million €)	%	Amount (million €)	%	Amount (million €)	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI						
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0	1	0.0		
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	11	0.1	11	0.1		
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0.0	1	0.0		
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0.0	1	0.0		
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0	0	0.0		
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	<b>9,026</b>	<b>99.8</b>	<b>9,020</b>	<b>99.8</b>	<b>6</b>	<b>100.0</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>9,040</b>	<b>100.0</b>	<b>9,034</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>



#### 4.1 Taxonomy-eligible but not taxonomy-aligned economic activities – based on the Turnover KPI

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount (million €)	%	Amount (million €)	%	Amount (million €)	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7	0.0	7	0.0		
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	28	0.0	28	0.0		
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0	0	0.0		
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>121,988</b>	<b>32.8</b>	<b>121,985</b>	<b>32.8</b>	<b>3</b>	<b>0.0</b>
8.	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	<b>122,023</b>	<b>32.8</b>	<b>122,020</b>	<b>32.8</b>	<b>3</b>	<b>0.0</b>

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#### 4.2 Taxonomy-eligible but not taxonomy-aligned economic activities – based on the CapEx-KPI

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount (million €)	%	Amount (million €)	%	Amount (million €)	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI						
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0.0	3	0.0		
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	17	0.0	17	0.0		
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0	0	0.0		
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>122,356</b>	<b>32.9</b>	<b>122,352</b>	<b>32.9</b>	<b>5</b>	<b>0.0</b>
8.	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	<b>122,376</b>	<b>32.9</b>	<b>122,372</b>	<b>32.9</b>	<b>5</b>	<b>0.0</b>

### 5.1 Taxonomy non-eligible economic activities – based on the Turnover KPI

Row	Economic activities	Amount (million €)	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0.0
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>241,688</b>	<b>64.9</b>
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	<b>241,692</b>	<b>64.9</b>

### 5.2 Taxonomy non-eligible economic activities – based on the CapEx-KPI

Row	Economic activities	Amount (million €)	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	10	0.0
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0.0
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>241,007</b>	<b>64.7</b>
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	<b>241,020</b>	<b>64.7</b>

#### Note on the EU taxonomy templates

In the EU taxonomy templates in this annex, empty cells mean that there is no relevant exposure. Due to rounding, the amount is shown as 0.0 million euros or 0% in some cases.

# Limited Assurance Report of the Independent Auditor

regarding the combined separate non- financial report<sup>1</sup>

To Commerzbank AG,  
 Frankfurt/Main

We have performed a limited assurance engagement of the consolidated non-financial group statement of COMMERZBANK Aktiengesellschaft, Frankfurt am Main (hereinafter "company") and the parent company's non-financial statement, which is combined with it, which are published in the form of a separate report outside the management report (hereinafter "combined separate non-financial report") for the period from 1 January 2023 to 31 December 2023.

## Responsibilities of Management

Management of the parent company is responsible for the preparation of the combined separate non-financial report in accordance with Section 340i (5) in conjunction with Section 315c in conjunction with Sections 289c to 289e HGB ["Handelsgesetzbuch": German Commercial Code] and Article 8 of REGULATION (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (hereinafter the "EU Taxonomy Regulation") and the Delegated Acts adopted thereunder, as well as for making their own interpretation of the wording and terms contained in the EU Taxonomy Regulation and the delegated acts adopted thereunder as set out in section "Incorporating EU taxonomy" of the combined separate non-financial report.

This responsibility includes the selection and application of appropriate non-financial reporting methods and making assumptions and estimates about individual non-financial disclosures of the Group that are reasonable in the circumstances. Furthermore, management is responsible for such internal control as they consider necessary to enable the preparation of a combined separate non-financial report that is free from material misstatement, whether due to fraud or error.

The EU Taxonomy Regulation and the Delegated Acts issued thereunder contain wording and terms that are still subject to considerable interpretation uncertainties and for which clarifications have not yet been published in every case. Therefore, management has disclosed their interpretation of the EU Taxonomy Regulation and the Delegated Acts adopted thereunder in section "Incorporating EU taxonomy" of the combined separate non-financial report. They are responsible for the defensibility of this interpretation. Due to the immanent risk that indeterminate legal terms may be interpreted differently, the legal conformity of the interpretation is subject to uncertainties.

## Independence and Quality Assurance of the Assurance Practitioner's firm

We have complied with the independence and quality assurance requirements set out in the national legal provisions and professional pronouncements, in particular the Professional Code for German Public Auditors and Chartered Accountants (in Germany) and the IDW Standard on Quality Management 1: Requirements for Quality Management in Audit Firms (IDW QMS 1 (09.2022)).

## Responsibilities of the Assurance Practitioner

Our responsibility is to express a conclusion with limited assurance on the combined separate non-financial report based on our assurance engagement.

We conducted our assurance engagement in the form of a limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements other than Audits or Reviews of Historical Financial Information" issued by the IAASB.

<sup>1</sup> Our engagement applied to the German version of combined separate non-financial report. This text is a translation of the Independent Assurance Report issued in German, whereas the German text is authoritative.

This standard requires that we plan and perform the assurance engagement to obtain limited assurance about whether any matters have come to our attention that cause us to believe that the company's combined separate non-financial report, has not been prepared, in all material respects, in accordance with Section 340i (5) in conjunction with Section 315c in conjunction with Sections 289c to 289e HGB and the EU Taxonomy Regulation and the Delegated Acts issued thereunder as well as the interpretation by management disclosed in section "Incorporating EU taxonomy" of the combined separate non-financial report.

In a limited assurance engagement, the procedures performed are less extensive than in a reasonable assurance engagement, and accordingly, a substantially lower level of assurance is obtained. The selection of the assurance procedures is subject to the professional judgement of the assurance practitioner.

In the course of our assurance engagement we have, among other things, performed the following assurance procedures and other activities:

- Gain an understanding of the structure of the group's sustainability organisation and stakeholder engagement.
- Inquiries of group-level personnel who are responsible for the materiality analysis in order to understand the processes for determining material topics and respective reporting boundaries for COMMERZBANK Aktiengesellschaft.
- A risk analysis, including a media research, to identify relevant information on COMMERZBANK Aktiengesellschaft's sustainability performance in the reporting period.
- Identification of likely risks of material misstatement in the combined separate non-financial report.
- Inquiries of relevant employees involved in the preparation of the combined separate non-financial report about the preparation process and about the internal control system related to this process.
- Evaluation of the design and the implementation of systems and processes for the collection, processing and monitoring of disclosures, including data consolidation, on environmental, employee and social matters, respect for human rights, and combatting corruption and bribery.
- Analytical assessment of the data and trends of the quantitative data reported by all sites for consolidation at Group-level.
- Inquiries of Group-level personnel who are responsible for determining disclosures on concepts, due diligence processes, results and risks, performing internal control functions and consolidating disclosures.

- Inquiries of responsible employees at group-level to gain an understanding of the procedure for determining the key performance indicators, including qualitative information in accordance with the EU Taxonomy Regulation.
- Assessment of the design and implementation of systems and processes for the collection, processing and monitoring of key performance indicator data in accordance with the EU Taxonomy Regulation, including any supporting information to be provided in accordance with the relevant annexes.
- Inspection of selected internal and external documents.
- Evaluation of the presentation of the combined separate non-financial report.

In particular, the following audit procedures were performed to audit the PRB Report, that is contained in the combined separate non-financial report:

- Consideration of the "key areas requiring limited assurance" identified in the PRB Guidance for Assurance Providers.
- Inquiries of responsible personnel to obtain an understanding of for the process, organisation and internal controls relevant to the preparation and disclosure of the PRB Report.
- Evaluation of the risk of material misstatement in the audited sections of the PRB Report.
- Inspection of selected internal and external documents.
- Reconciliation of material disclosures in the selected sections of the PRB Report with underlying documents, including requesting and reviewing supporting documentation.
- Assessment of the accuracy of the references made in the PRB Report.

The following procedures were not within the scope of the engagement:

- An assessment of the nature of the non-financial information included in the PRB Report or the possible absence of significant non-financial information.
- The scope of our work did not include an assessment of the adequacy of the processes and controls in place regarding the preparation of the PRB Report.
- The scope of our work in relation to the PRB Report was limited to assessing whether the disclosed statements accurately represent actual steps taken and activities performed by COMMERZBANK Aktiengesellschaft.

In determining the disclosures in accordance with Article 8 of the EU Taxonomy Regulation, management is required to interpret undefined legal terms. Due to the immanent risk that undefined legal terms may be interpreted differently, the legal conformity of their interpretation and, accordingly, our assurance engagement thereon are subject to uncertainties.

## Assurance Opinion

Based on the assurance procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the combined separate non-financial report of COMMERZBANK Aktiengesellschaft for the period from 1 January 2023 to 31 December 2023 has not been prepared, in all material respects, in accordance with Section 340i (5) in conjunction with Section 315c in conjunction with Sections 289c to 289e HGB and the EU Taxonomy Regulation and the Delegated Acts issued thereunder as well as the interpretation by management as disclosed in section “Incorporating EU taxonomy” of the combined separate non-financial report.

## Restriction of Use/General Engagement Terms

This assurance report is solely addressed to COMMERZBANK Aktiengesellschaft.

Our assignment for COMMERZBANK Aktiengesellschaft and professional liability is governed by the General Engagement Terms for Wirtschaftsprüfer (German Public Auditors) and Wirtschaftsprüfungsgesellschaften (German Public Audit Firms) (Allgemeine Auftragsbedingungen für Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften) in the version dated 1 January 2017 ([https://www.kpmg.de/bescheinigungen/lib/aab\\_english.pdf](https://www.kpmg.de/bescheinigungen/lib/aab_english.pdf)). By reading and using the information contained in this assurance report, each recipient confirms having taken note of provisions of the General Engagement Terms (including the limitation of our liability for negligence to EUR 4 million as stipulated in No. 9) and accepts the validity of the attached General Engagement Terms with respect to us.

Frankfurt/Main, 28 February 2024

KPMG AG

Wirtschaftsprüfungsgesellschaft

(Original German version signed by:)

Protze

ppa. Seidel

Wirtschaftsprüfer

(German Public Auditor)