



Progress Report 2024

Summary in line with Principles for Responsible Banking (PRB)
Commerzbank AG

Principle 1: Alignment	Principle 2: Impact & Target Setting	Principle 3: Clients & Customers
<p>Content</p> <p>Sustainability has been an integral part of our corporate strategy since 2020. In this context, we see responsibility as a key guiding principle that underpins our holistic ESG approach. Our sustainability strategy adopted by the Board of Managing Directors is based on two pillars: We support our customers in their sustainable transformations and set a good example ourselves.</p> <p>At the heart of our sustainability strategy is our commitment to becoming a Net-Zero bank. This means reducing the greenhouse gas emissions to net zero. Additionally, we set ambitious targets across all ESG dimensions. After all, sustainability is about more than climate change – we’re also committed to community engagement and responsible governance. For us, sustainability is not just a strategic goal, but a comprehensive approach that informs all aspects of our business.</p>	<p>Content</p> <p>By means of our materiality assessment, we have identified key impacts, risks and opportunities that are of crucial importance to our business model and activities. These affect our own business operations as well as our banking business in the downstream value chain. The findings of the materiality assessment are gradually being incorporated into our strategy processes.</p> <p>Our sustainability strategy is characterized by performance indicators across all ESG dimensions:</p> <p>Our strategic environmental targets:</p> <ul style="list-style-type: none"> • Net zero carbon emissions from our loan and investment portfolio by 2050. • Permanently allocate at least 10 % of our new loan business to sustainable projects and business models. • Net zero carbon emissions in own operations by 2040. <p>Our strategic targets in the area of social responsibility:</p> <ul style="list-style-type: none"> • 40% women in leadership roles by 2030. • Maintain or improve on our 2024 employee satisfaction score for employee satisfaction 2025. <p>Our strategic targets in the area of corporate governance:</p> <ul style="list-style-type: none"> • Clear stance against corruption: We implement comprehensive measures to prevent and detect corruption. • Permanently achieve top scores in the culture of Integrity Score. 	<p>Content</p> <p>We have divided our portfolio into General Finance and Sustainable Finance. General Finance includes financial transactions that meet our general transformation requirements without being subject to our social and environmental exclusion criteria. These transactions do not have to meet the strict criteria of Sustainable Finance. This also means that we want to encourage rethinking and innovative solutions in all sectors, rather than categorically excluding entire industries.</p> <p>At the same time, however, we also demand that our clients take a decisive step towards greater sustainability – not only to achieve our net-zero target, but also to ensure Commerzbank’s long-term stability. We use the portfolio management transformation criteria (SBTi) to screen new business for carbon-intensive sectors. We are convinced that a company that does not position itself sustainably today has no long-term prospects.</p> <p>Sustainable Finance comprises all financial products that we classify as sustainable based on an internal review. Our sustainable financial products in the areas of loans, bonds, investment products, pensions, trade finance and treasury aim to meet both environmental and social objectives to ensure a holistic approach to promoting sustainability and social prosperity.</p>
<p>Links & references</p> <ul style="list-style-type: none"> • Group Sustainability Report, [SBM-1] • ESG Framework, Introduction 	<p>Links & references</p> <ul style="list-style-type: none"> • Group Sustainability Report, [IRO-1] • Group Sustainability Report, [SBM-3] • ESG Framework, Environment • ESG Framework, Social • ESG Framework, Governance 	<p>Links & references</p> <ul style="list-style-type: none"> • Group Sustainability Report, [E1-2] • Group Sustainability Report, [E1-3] • Group Sustainability Report, [E1-4] • ESG Framework, Environment -> General Finance • ESG Framework, Environment -> Sustainable Finance

Principle 4: Stakeholders	Principle 5: Governance & Culture	Principle 6: Transparency & Accountability
<p>Content</p> <p>For us, corporate responsibility means seeking regular dialogue with external and internal stakeholders. That's why customers, employees, investors and their respective expectations are one focus of our corporate strategy. The Bank's aim here is to get to know the needs and interests of its stakeholders and also to present its own perspective. The outcome of this engagement can be incorporated into the corporate strategy as a decision-making and planning aid.</p> <p>We pay close attention to current discourse on important social, economic and financial policy issues. We keep in contact with our stakeholders through personal dialogue, discussion events, strategic partnerships and various public communication formats.</p> <p>To promote mutual dialogue with our stakeholders, we are also in regular communication with the Bank's Sustainability Advisory Board, which we have established in 2022 under the patronage of the CEO.</p> <p>The engagement of key stakeholder groups is also an integral part of our materiality assessment process. This helps us to maintain a differentiated and independent perspective when assessing potentially important topics. As part of the materiality assessment, stakeholders were surveyed both on the disclosure requirements specified by the ESRS as well as on entity-specific topics.</p>	<p>Content</p> <p>The corporate values <i>Integrity</i>, <i>Performance</i> and <i>Responsibility</i> form the basis of our corporate culture. They govern how we interact with one another as well as how we conduct ourselves towards internal and external customers, business partners and society. The values demonstrate that we take our corporate responsibility seriously and are guided by common values.</p> <p>Sustainability matters are included in the annual strategy process for the overall bank strategy and are discussed in forums such as meetings of the Board of Managing Directors. The Board of Managing Directors develops the Commerzbank Group's strategy, discusses it with the Supervisory Board and ensures it is implemented.</p> <p>A cross-divisional decision-making and escalation body enables the sustainable orientation of the Bank's business model to be managed holistically. The Group Sustainability Board has firmly embedded the wide-ranging issue of sustainability within the Bank's organisation. It sets the strategic sustainability targets and monitors the actions taken for their implementation and management. It also reviews progress with respect to the strategic sustainability targets.</p> <p>As overarching sustainability area, the Group Sustainability Management is responsible for the ongoing development of the sustainability strategy and comprehensive governance. At the same time, Group Sustainability Management manages an internal Group-wide programme and thereby coordinates the sustainability work of Commerzbank in an overarching way.</p>	<p>Content</p> <p>Our Group Sustainability Report for the reporting year 2024 was, for the first time, prepared in accordance with the European Sustainability Reporting Standards (ESRS), the reporting standards of the Corporate Sustainability Reporting Directive (CSRD). As part of the Management Report, the combined consolidated non-financial report was subject to a review with a limited assurance by the auditing firm KPMG.</p> <p>By means of our ESG Framework, we disclose all key building blocks of our sustainability strategy and are making sustainability a key performance indicator for our company. The ESG framework forms the foundation of our holistic sustainability strategy around Environment, Social, and Governance. This ESG framework has been externally assessed and validated by ISS Corporate. The results are documented in an External Review.</p>
<p>Links & references</p> <ul style="list-style-type: none"> • Group Sustainability Report, [GOV-1] • Group Sustainability Report, [SBM-2] • Group Sustainability Report, [SBM-3] • Group Sustainability Report, [IRO-1] 	<p>Links & references</p> <ul style="list-style-type: none"> • Group Sustainability Report, [GOV-1] • Group Sustainability Report, [G1-1] 	<p>Links & references</p> <ul style="list-style-type: none"> • Annual Report, Assurance Report of the independent German Public Auditor • ESG Framework, External Review



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