



# Progress Report 2025

Summary in line with Principles for Responsible Banking (PRB)

Commerzbank AG

Principle 1: Alignment	Principle 2: Impact & Target Setting	Principle 3: Clients & Customers
<p><b>Content</b></p> <p>Sustainability has been an integral part of our corporate strategy since 2020. We reaffirmed our high ambitions with regard to ESG issues with the “Momentum 2030” strategy, an evolution of our Strategy 2027, through which we have firmly embedded the topic of responsibility throughout the entire group. We see responsibility as a key guiding principle that underpins our holistic approach towards Environment, Social, and Governance (ESG).</p> <p>For instance, we review the impact of our financing and manage our portfolios in line with the Paris climate target and the Sustainable Development Goals (SDGs). In this way, we aim to actively shape the transformation towards a sustainable economy. The core of our sustainability strategy is to become a net-zero bank, and thereby try to contribute to limiting global warming to well below 2 °C and as far as possible to 1.5 °C.</p> <p>We demonstrate our commitment through memberships in the Science Based Targets initiative (SBTi) and the Task Force on Climate-related Financial Disclosures (TCFD). The importance of biodiversity is reflected in our participation in the Biodiversity in Good Company (BiGCI) Initiative and the Task Force on Nature-related Financial Disclosures (TNFD).</p> <p>At the same time, we have set ourselves ambitious targets across all ESG dimensions. For us, sustainability includes not only climate action, but also social commitment and responsible corporate governance. As a founding member of Germany's Diversity Charter and signatory of the UN Women Empowerment Principles, we are also committed to promoting equality.</p> <p>For us, responsibility is not just a strategic goal, but a comprehensive approach that informs all aspects of our business.</p> <p>↘</p>	<p><b>Content</b></p> <p>We pursue and manage our sustainability strategy with performance indicators across all ESG dimensions. Our climate targets are in line with the Paris Climate Agreement and the EU's climate targets: We aim to reduce emissions from our loan and investment portfolio to net zero by 2050 and to achieve net zero in banking operations by 2040. For the interim targets up to 2030, we use SBTi-compliant methods to limit global warming to 1.5 °C or well below 2 °C. In doing so, we address both the financed issues of the credit and investment portfolio (Scope 3.15) and the issues from our own operations (Scopes 1 and 2). The key levers are portfolio management, product development, dialogue with customers and the continuous improvement of the environmental and energy balance at our sites.</p> <p><b>Our strategic environmental targets:</b></p> <ul style="list-style-type: none"> <li>• [E1] Net zero carbon emissions from our loan and investment portfolio by 2050.</li> <li>• [E2] Permanently allocate at least 10 percent of our new loan business to green and social projects and business models, as well as to our clients' transformation measures.</li> <li>• [E3] Net zero carbon emissions in our own operations by 2040 (Scope 1 and Scope 2).</li> </ul> <p><b>Our strategic targets in the area of social responsibility:</b></p> <ul style="list-style-type: none"> <li>• [S1] 40% women in management positions by 2030.</li> <li>• [S2] Maintain or improve employee satisfaction on a lasting basis.</li> </ul> <p><b>Our strategic targets in the area of corporate governance:</b></p> <ul style="list-style-type: none"> <li>• [G1] Clear stance against corruption. We implement comprehensive measures to prevent and detect corruption.</li> <li>• [G2] Achieve top Culture of Integrity scores on a permanent basis.</li> </ul> <p>↘</p>	<p><b>Content</b></p> <p>Commerzbank AG has set itself ambitious, strategic net-zero targets and is committed to being a reliable partner in driving forward the sustainable transformation of the economy while also supporting our customers in their sustainable transformation. We have divided our portfolio into General Finance and Sustainable Finance.</p> <p><b>General Finance: Sustainability criteria as a guiding principle</b></p> <p>General Finance includes all our 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 (Target E1), but also to ensure Commerzbank's long-term stability. After all, sustainability risks resulting from climate change, the loss of biodiversity or human rights violations are potential financial risks for the real economy – and thus also for the financial industry.</p> <p>There are also companies and engagements that we will no longer support, either now or in the future. In controversial sectors in particular, we use robust guidelines to determine which social and environmental transformation requirements apply and have strict exclusion criteria to set clear limits. In addition, 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>↘</p>

Principle 1: Alignment	Principle 2: Impact & Target Setting	Principle 3: Clients & Customers
<p>↘</p> <p>The ESG framework “<i>Acting responsibly, growing sustainably</i>” forms the foundation of our holistic sustainability strategy. In 2025, we formulated our Climate Transition Plan in compliance with the Corporate Sustainability Reporting Directive (CSRD). With our transition plan, which was released in early 2026, we embed our ambition to achieve net-zero CO<sub>2</sub> emissions by 2050 for the credit and investment portfolio into our business strategy.</p> <p>The SDGs and the Paris Agreement are our guiding principles in actively transforming our bank towards greater sustainability and accompanying our clients as they work towards more climate-friendly investments. We are primarily focusing our efforts on those goals which we have the greatest impact on by means of our business model. Therefore, the environmental SDGs are our initial strategic focus.</p> <p>To achieve these targets, we align ourselves with relevant regulatory and science-based standards, in particular the EU Taxonomy and the emission reduction pathways of the SBTi. We also incorporate other international and external standards, including the Greenhouse Gas Protocol, PCAF methodology (PCAF Standard A, Version 2022), ISO standards (especially 14001 and 50001) and the VfU Standard.</p>	<p>↘</p> <p><b>Our double materiality assessment for the identification of material topics</b></p> <p>In our materiality assessment, we identify and evaluate all sustainability matters that are important for the Commerzbank Group. This allows us to meet the requirements of the European Sustainability Reporting Standards (ESRS) and ensures that we measure both our impact on the environment and society (impact materiality) as well as the financial risks and opportunities for the Group (financial materiality).</p> <p>The assessment covers the entire Group, including all companies included in the financial statements. We also take into account activities along both the upstream and downstream value chains and include non-consolidated companies if they could potentially have a material impact.</p> <p>By means of our double materiality assessment, we have identified material impacts, risks and opportunities that are of crucial importance to our business model and operating activities. The validated results of the materiality assessment form the basis of our sustainability reporting. We use them to plan strategy, manage risk, set our ESG targets and metrics and prioritise fields of action in the Bank’s business areas and segments. They are also used to fine-tune corporate strategy and make regular updates to our ESG strategy.</p>	<p>↘</p> <p><b>Sustainable Finance: Financial products for a sustainable future</b></p> <p>Sustainable finance products play a central role in promoting a responsible financial world and real economy. For Commerzbank, sustainability means supporting ecological and environmentally friendly investments as well as assuming social responsibility.</p> <p>Our sustainable financial products therefore aim to meet both environmental and social objectives. All financial products that we classify as sustainable are subject to internal review. The Sustainability Management team ensures that the classification of a product as financially sustainable is appropriate. This review is integrated into clearly defined processes for new products.</p> <p>With its sustainable loan business<sup>1</sup>, Commerzbank is actively driving forward the transformation towards a more sustainable economy. We directly finance sustainable measures and business models (green loans and social loans) as well as initiatives that support the transition to more sustainable business models (transition loans). We have set ourselves the goal of granting at least 10 percent of our new loan business<sup>2</sup> as sustainable loans in the long term.</p>
<p><b>Links &amp; references</b></p> <ul style="list-style-type: none"> <li>• <i>ESG framework, Introduction</i></li> <li>• <i>Group Sustainability Report, SBM-1</i></li> <li>• <i>Group Sustainability Report, E1-1</i></li> <li>• <i>Group Sustainability Report, E1-2</i></li> <li>• <i>Webpage, Sustainable Development Goals</i></li> </ul>	<p><b>Links &amp; references</b></p> <ul style="list-style-type: none"> <li>• <i>Group Sustainability Report, IRO-1</i></li> <li>• <i>Group Sustainability Report, SBM-3</i></li> <li>• <i>Group Sustainability Report, E1-1</i></li> <li>• <i>ESG framework, Environment</i></li> <li>• <i>ESG framework, Social</i></li> <li>• <i>ESG framework, Governance</i></li> </ul>	<p><b>Links &amp; references</b></p> <ul style="list-style-type: none"> <li>• <i>ESG framework, Environment &gt; Climate transition plan</i></li> <li>• <i>ESG framework, Environment &gt; General Finance</i></li> <li>• <i>ESG framework, Environment &gt; Sustainable Finance</i></li> </ul>

<sup>1</sup> The classification and objectives of our lending business encompass Commerzbank AG in both domestic and international markets.

<sup>2</sup> The total volume of newly recorded and outstanding loan commitments within the past 12 months as of the reporting date. In the Corporate Clients segment, this includes not only new agreements but also the extension of existing contracts.

Principle 4: Stakeholder	Principle 5: Governance & Culture	Principle 6: Transparency & Accountability
<p><b>Content</b></p> <p>For us, corporate responsibility also means maintaining a regular exchange with our stakeholders. That is why our corporate strategy focuses on clients, employees, investors and their expectations. In this way, we gain insights into their needs and interests and at the same time contribute our perspective. The results are incorporated into our strategy as a decision-making and planning aid. Dialogue on social, economic and financial policy issues is particularly important to us. We cultivate it through personal conversations, discussion events, strategic cooperations and public communication formats.</p> <p>We also strengthen the mutual dialogue with our stakeholders through an external Sustainability Advisory Board, which we launched in 2022 under the patronage of the CEO. The Sustainability Advisory Board provides impulses for the implementation and further development of our sustainability strategy.</p> <p>Moreover, we consider the interests of relevant stakeholders – such as political actors, NGOs, customers and investors – in our ESG framework. For instance, we directly involved internal stakeholders in the creation process. Besides, we also involve key stakeholder groups as part of the materiality assessment. This helps us maintain a differentiated and independent perspective. Our stakeholders were surveyed both on the disclosure requirements specified by the ESRS as well as on entity-specific topics.</p>	<p><b>Content</b></p> <p>Our corporate values of <i>integrity, performance</i> and <i>responsibility</i> are the foundation of our corporate culture. They shape the way we interact with each other as well as with internal and external customers, business partners and society. The values show that we are aware of our corporate responsibility and are guided by traditional values.</p> <p>Sustainability issues are incorporated into the annual strategy process for our overall bank strategy and are discussed at Board meetings.</p> <p>A cross-divisional decision-making and escalation body enables the sustainable alignment of the Bank's business model to be managed holistically. The Group Sustainability Board (GSB) 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 the overarching sustainability area, 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><b>Content</b></p> <p>Our Group Sustainability Report for the 2025 reporting year was, once again, prepared in accordance with ESRS, the reporting standards for the CSRD. Based on our materiality analysis, we disclose information and around 800 data points in the areas of climate change (E1), biodiversity and ecosystems (E4), own workforce (S1), consumers and end users (S4), and business conduct (G1). In addition, the report includes our disclosure in accordance with the EU Taxonomy Regulation 2020/852. This combined non-financial Group statement was subject to a limited assurance audit by the auditing firm KPMG as part of the management report.</p> <p>In our ESG framework, we disclose all key building blocks of our sustainability strategy and in particular our climate transition plan. In this way, we are making sustainability a key performance indicator. We are continuously updating our framework to transparently reflect both regulatory developments and our own progress. In the ESG framework, we publish our climate transition plan, our performance indicators and detailed information on our exclusion criteria and sustainable product solutions. The ESG framework has been externally assessed and validated by ISS Corporate.. The results were documented in an external review.</p>
<p><b>Links &amp; references</b></p> <ul style="list-style-type: none"> <li>• <i>Group Sustainability Report, SBM-2</i></li> <li>• <i>Webpage, Governance structure</i></li> <li>• <i>Webpage, Sustainability Advisory Board</i></li> </ul>	<p><b>Links &amp; references</b></p> <ul style="list-style-type: none"> <li>• <i>Group Sustainability Report, GOV-1</i></li> <li>• <i>Group Sustainability Report, G1-1</i></li> </ul>	<p><b>Links &amp; references</b></p> <ul style="list-style-type: none"> <li>• <i>Group Sustainability Report, Assurance Report of the independent German Public Auditor</i></li> <li>• <i>ESG framework, External review</i></li> <li>• <i>Webpage, Sustainability reports</i></li> <li>• <i>Webpage, ESG framework</i></li> </ul>



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