



Standard for Responsible Procurement Guideline

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Notes:

This instruction uses a gender-neutral and inclusive language. Whenever possible, the generic masculine is avoided and all employees of any gender identity (m/f/diverse) are addressed.

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1 Objectives and Background

1.1 Summary

Banks are not only extremely important for the development of modern economies, they also play an important and responsible role in society as intermediary, employer, taxpayer and donor. Conscious of this, Commerzbank expressly stands up for its corporate responsibility. In doing so, it takes into account the economic and social impacts of its actions, as well as impacts on energy consumption, greenhouse gas emissions, resource consumption, waste generation and the use of hazardous substances, insofar as these are relevant to the respective activity and subject to legal, regulatory or internal requirements.

The cornerstone of Commerzbank's corporate responsibility and values-oriented corporate culture is formed by the Corporate Values Integrity, Performance and Responsibility. Through these values our aim is to ensure and encourage responsible actions throughout the company and at all levels, derived in particular from the value "Integrity" – Commerzbank's most important quality. This is the basis of the trust placed in us as well as a prerequisite for long-term economic success. In order to achieve this objective, Commerzbank has drawn up the "Guidelines on Corporate Responsibility", which transforms the Corporate Values into instructions for operational business.

Commerzbank's corporate responsibility does not end with our internal processes and activities, however, but also stretches along the entire value-added chain. Requirements relating to human rights and integrity in business conduct, as well as applicable requirements concerning, in particular, energy consumption, greenhouse gas emissions, waste and hazardous substances, must therefore also be taken into account when procuring goods and services.

For the structured assessment of these requirements and risks, Commerzbank follows a holistic ESG approach. ESG stands for Environment, Social and Governance. Environment covers requirements relating to energy consumption, greenhouse gas emissions, material and resource consumption, waste prevention and disposal, and hazardous substances. Social covers, in particular, requirements relating to human rights, working conditions, health and safety, diversity, and the responsible treatment of employees, customers, business partners and society. Governance covers requirements relating to integrity in business conduct, compliance with laws and internal requirements, and transparent and responsible corporate processes.

The objective of the Standard is to systematically support procurement activities within the framework of the applicable requirements and to make them practicable for all process participants. To this end, the Standard describes internal process requirements and—depending on the respective procurement activity—potential contractual requirements relating to human rights, integrity, and selected environmental and energy aspects. At the same time, the Standard serves to raise awareness among Commerzbank employees of these requirements. The Standard describes requirements that, depending on the respective procurement activity, may be contractually agreed with suppliers and service providers. It does not state that all procurement activities, suppliers, services or products generally or uniformly meet specific environmental, social or sustainability performance standards.

1.2 Legal/Regulatory Framework

The “Global Policy for the Protection of Human Rights and the Environment” defines the principles for handling human rights-related risks and the environmental risks expressly covered by the German Supply Chain Due Diligence Act (LkSG). These include, in particular, risks associated with mercury, persistent organic pollutants, and the handling, collection, storage and disposal of hazardous waste. The “Policy Statement on Human Rights and Environmental Due Diligence” describes externally Commerzbank’s procedures, expectations, and preventive and remedial measures relating to human rights-related risks and the environmental risks expressly covered by the German Supply Chain Due Diligence Act.

With the Standard for Responsible Procurement, GM-OS Corporate Procurement is issuing binding guidelines for all process participants on considering requirements relating to human rights, integrity in business conduct, energy consumption, greenhouse gas emissions, waste and hazardous substances when procuring goods and services. The criteria set out in the Standard reflect Commerzbank’s expectations regarding the corporate responsibility of its service providers and suppliers.

2 Scope and target group

2.1 Scope

The rules agreed by GM-OS Corporate Procurement are binding for all units of Commerzbank AG. GM-OS Corporate Procurement is responsible for procurement in Commerzbank AG domestically and in the foreign branches. The standard can be used as a framework for internal specifications for subsidiaries in Germany and abroad, which are agreed on basis of specific company circumstances.

Functional scope:	Commerzbank AG (Busi.Seg.+ Gr.Divisions)
Regional scope:	Commerzbank worldwide

2.2 Target Groups

The target group comprises all process participants for carrying out the procurement process.

Target Group	Key messages for the target group
All employees	...are familiar with the principles of responsible procurement (especially section 3.1)
Employees with operational cost competencies	... are familiar with the requirements and apply them.
Employees of GM-OS Corporate Procurement Steering	... are familiar with the requirements in detail and can advise employees in the departments.



3 Functional Description of the Instruction

3.1 Governance criteria

3.1.1 Internal commitment: Ethics guideline of GM-OS Corporate Procurement and Code of Conduct

The procurement-specific ethics guideline highlights existing rules of conduct for procurement activities, thereby giving all employees binding rules for conduct with integrity in procurement.

Commerzbank has also converted particularly business-relevant risks into concrete guidelines. Collectively these provide binding rules for conduct with integrity and refer to the subjects such as bribery & corruption, tax evasion, discretion, money laundering, insider trading and principles for dealing with each other at work. Any infringement of the rules could result in disciplinary measures being taken.

All suppliers and service providers used by Commerzbank agree to observe the specific social requirements and to impose the compliance with the corresponding requirements on their own suppliers and service providers.

3.1.2 External commitment: Contracts for goods and services / Integrity Clause

Commerzbank requires that all suppliers and service providers adhere to the applicable laws and generally accepted standards. Concrete requirements and obligations concerning integrity and conduct of the supplier are described within the underlying contract for goods and services including the integrity clause and these must be fulfilled by all suppliers and service providers. By accepting the Commerzbank contract terms and conditions, the suppliers and service providers to Commerzbank have accepted their obligation to conduct their business activities within these parameters. Any amendment to these standard terms is only permitted with the prior approval of the Commerzbank Legal and Compliance departments.

3.2 Social criteria

3.2.1 Fundamentals of social standards

Commerzbank respects human rights and personal rights around the world as the fundamental rules of society. As a definition of human rights, Commerzbank applies the internationally accepted human rights standards, which include the UN International Bill of Human Rights and the ILO Core Labour Standards, which are also covered by the Supply Chain Due Diligence Act, as well as the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. Additionally, by participating in the UN Global Compact, Commerzbank has committed itself in particular to:

- Respecting human rights,
- Promoting their observance in its area of influence and to ensuring that breaches of human rights are not supported by its own business activities,
- Ensuring the freedom of association and the effective recognition of the right to collective bargaining,
- Working for the end of all forms of forced labour,

- Working for an abolition of child labour, and
- Working for the end of discrimination in recruitment and employment.

Commerzbank is a signatory to the Charter of Diversity of Companies in Germany, thereby sending a visible signal to employees, customers and business partners of the clear acceptance of individuality and diversity. Also, we have signed the United Nations Women's Empowerment Principles. Commerzbank is thus committed to further promoting equality between men and women.

3.2.2 Specific social requirements

Commerzbank also expects its business partners to observe and comply with human rights and personal rights. In order to contribute to the promotion and protection of these rights, Commerzbank uses the many possibilities offered in cooperation with suppliers and service providers. As a result, compliance with social standards by suppliers and service providers represents an integral component of the Standard for Responsible Procurement.

All suppliers and service providers used by Commerzbank agree to observe the specific social requirements and to impose compliance with the corresponding requirements on their own suppliers and service providers.

Free choice of work

Suppliers and service providers must not force anyone to work and must not permit any form of forced labour.

Ban on child labour

Suppliers and service providers must not employ children younger than the minimum age specified by the International Labour Organization or by national laws. The maximum specified minimum age applies.

Ban on illegal employment

Suppliers and service providers must not permit illegal employment. Commerzbank expects VAT and income tax, as well as social insurance, to be paid according to the applicable statutory provisions.

Ban on discrimination

Suppliers and service providers must commit to equal opportunities and the equal treatment of their employees. No one shall be disadvantaged or harassed as a result of ethnic origin, gender, religion, nationality, world view, disability, age, sexual orientation and sexual identity or for other reasons.



Remuneration for work

Suppliers and service providers must pay fair wages and additional payments, which fulfil all applicable laws and which correspond to the applicable local and industry-specific practices. Accordingly, they are obliged to pay local minimum wages.

Working time

Suppliers and service providers must guarantee that their employees do not exceed the locally applicable, statutorily specified maximum working hours. Accordingly, they are obliged to observe a maximum daily working time of eight hours or a weekly working time of 48 hours (see 4.1. ILO Core Labour Standards).

Freedom of association

Suppliers and service providers must respect their employees' rights to freedom of association and collective bargaining and must ensure employees active in trade unions or employee organizations are not discriminated against or preferred in any form.

Treatment with respect

Commerzbank expects suppliers and service providers to respect the dignity, private sphere and personal rights of their employees and to provide a workplace that does not affect the physical or intellectual integrity of a person. Sexual harassment or abuse, intimidation, mobbing and corporal punishment must not be tolerated.

Health and safety

Suppliers and service providers are responsible for the health and safety of their employees. Commerzbank expects suppliers and service providers to guarantee a safe and healthy working environment and to act to prevent accidents and occupational illnesses through preventive measures.

Diversity & Inclusion (D&I)

Commerzbank expects suppliers and service providers to demand and promote the appreciative and active handling of diverse topics (diversity) and cooperation in a spirit of partnership (inclusion). The D&I standards, which complement the corporate constitution and the philosophy of Commerzbank with the Code of Conduct and its Corporate Values, are decisive for this. Organizations that are important from a D&I perspective are listed in the appendix.

3.3 Requirements relating to environmental and energy aspects

Environmental and energy-related requirements within the meaning of this Standard are specific legal, regulatory, contractual or internally defined requirements. In particular, they may relate to energy consumption, greenhouse gas emissions, the use of materials and resources, waste and disposal, and hazardous substances. The term does not imply that products, services or suppliers are generally environmentally friendly.

3.3.1 Fundamentals of our environment and energy requirements

The applicable legal, regulatory and internal requirements must be taken into account in procurement activities. These include, in particular:

- requirements under the German Supply Chain Due Diligence Act relating to mercury, persistent organic pollutants and hazardous waste,
- requirements for deforestation-free supply chains under Regulation (EU) 2023/1115, where applicable,
- product-related requirements concerning energy consumption and energy efficiency—solutions are considered energy-efficient if they use energy as effectively as possible in relation to the respective operational purpose,
- internal requirements for recording and assessing energy consumption, life-cycle costs and relevant supplier information.

The specific applicability depends on the subject matter of the procurement and must be assessed in each procurement activity.

Certain Commerzbank locations and activities specified in the respective certificates are certified in accordance with ISO 14001 and ISO 50001. An *environmental management system* under ISO 14001 is the “part of the management system used to manage environmental aspects, fulfil compliance obligations, and address risks and opportunities”. *Environmental aspects* are elements of an organization’s activities, products or services that interact or can interact with the environment. An *energy management system* under ISO 50001 serves “to establish an energy policy, objectives, energy targets, action plans and processes to achieve the objectives and energy targets”. The specific scope and validity period of the certifications are determined exclusively by the current certificates. Supplementary principles governing operational requirements relating to environmental and energy aspects within the defined scope of the integrated environmental and energy management system are set out in Commerzbank’s Environmental Guidelines.

Commerzbank expects its service providers and suppliers to comply with the regulatory requirements applicable to their services and locations. As part of supplier management, information is also requested on existing ISO certifications, such as ISO 9001, ISO 14001 or ISO 50001, as well as climate protection targets defined by the respective company.

3.3.2 Specific environmental and energy requirements

For individual product groups, product labels awarded by public authorities or independent certification bodies may provide information on defined product characteristics, for example energy consumption, hazardous substances contained in the product, the origin of certain materials or recyclability. Such labels (see Annex 1) may be taken into account provided that their criteria are relevant to the respective procurement item and are transparent and verifiable.

When procuring energy-using systems, equipment, products and services, analyses aimed at reducing energy consumption must be taken into account in their selection and sizing. The assessment should support improvements in energy performance. In significant procurement projects, where relevant and within Commerzbank's control or influence, the expected useful life as well as the costs and impacts of recovery or disposal are considered in addition to energy consumption during use. Rental and leasing agreements may be exempted where Commerzbank has no or only limited influence over the relevant factors.

For procurements expected to have significant impacts, for example IT hardware, logistics services or energy-using technical systems, the relevant impacts must be identified, taken into account in the selection decision and documented in a transparent and verifiable manner.

For procurements that may fall within the scope of Regulation (EU) 2023/1115 on deforestation-free supply chains (EUDR), the applicable legal and internal requirements must be taken into account. This applies in particular to relevant commodities and products such as wood, paper or other affected product groups. The specific assessment and implementation of the requirements is carried out on a risk-oriented basis and in accordance with the relevant internal requirements.

Where offers have comparable performance characteristics and total costs, preference must be given to the offer that more fully meets the social, governance, energy, emissions, resource, waste or hazardous substance criteria defined and documented in advance for the specific procurement activity.

3.4 Consequences of violations of the guideline

All employees must comply with the regulations set out in this guideline. Violations of the guideline may result in procedural and personal consequences, particularly under labour law. In addition, the bank may suffer reputational and economic damage in case of noncompliance.

Violations of the Standard for Responsible Procurement are reported to the responsible manager. The manager is responsible for deciding on disciplinary measures.

Externally, a gradual and formal escalation may be considered and initiated via the key internal stakeholders. Deviations from the Standard for Responsible procurement are addressed in regular supplier communication. The detailed description and scheduling of remedial measures is requested by the supplier. Appropriate documentation is provided for this purpose.

3.5 Regular reporting

As part of the annual supplier evaluation of the existing suppliers, Commerzbank management is also informed about the evaluation of the suppliers in accordance with the criteria defined in this guideline. Information on the requirements described in this Standard is also taken into account in Commerzbank's non-financial reporting, for example in the GRI report (Global Reporting Initiative).

4 Roles and Responsibilities

GM-OS Corporate Procurement is responsible for the content of this guideline in collaboration with GM-STS Sustainability Management.

The guideline has been created by GM-OS Corporate Procurement and published on the GM-OS Corporate Procurement intranet pages.

5 Controls

Within the scope of the internal control system, controls were defined for supplier evaluation in advance of new contract relationships as well as for existing suppliers. These controls also cover the requirements defined in this Standard as part of a scoring model. Compliance with these requirements is assessed by GM-OS Corporate Procurement. The commissioning organizational units contribute within the scope of their responsibility for managing and monitoring service providers. Identified deviations from the requirements defined for the respective supplier are communicated to the supplier. Required remedial measures, responsibilities and implementation deadlines are documented and tracked. Depending on the individual case, the supplier selection process may also include an analysis of the supplier by GRM-CO/Reputational Risk Management.

6 Appendix

6.1 Examples of product labels

Product labels may be taken into account in a purchasing decision if their current award criteria are relevant to the specific procurement item. A label does not replace the assessment of other requirements and only permits statements within its respectively defined assessment scope and field of application.

For electrical products in particular, labels or legally required product information may provide information on specific characteristics, such as energy consumption under defined operating conditions. Whether potential savings or target values can be derived from this must be assessed and documented on a case-by-case basis, taking into account the underlying criteria, the comparability of the products and the intended usage scenario.

The following overview lists selected labels and evidence solely as examples of potential sources of information in the procurement process. The overview is not exhaustive and does not constitute an assessment, recommendation or environmental or quality claim by Commerzbank regarding products, services, suppliers or labelling schemes. The current criteria and the specific scope of the respective label shall always be decisive.

Label/Evidence	Issuing Body or Certification Body	Relevant Scope of Information
Blauer Engel	Germany's official environmental label	Criteria depend on the respective product group, e.g. energy consumption, hazardous substances, noise or material use
EU Ecolabel	European Commission	Product-group-specific criteria
TCO Certified	External certification scheme	Selected requirements for IT products, depending on the current certification version
FSC	External certification scheme	Origin and supply chain of wood and paper products
PEFC	External certification scheme	Origin and supply chain of wood and paper products
CE	Legally required conformity marking	Conformity with relevant EU harmonisation legislation

6.2 References to important D&I Organizations

Commerzbank is strongly committed to gender equality and the promotion of diversity & inclusion and is involved in important D&I organizations:

- Signatory and member of the Charter of Diversity
<https://www.charta-der-vielfalt.de/netzwerk>
- Co-founder and Advisory Board of the Prout@Work Foundation
<https://www.proutatwork.de>
- Signatory of the United Nations Women's Empowerment Principles
- Member of the UnternehmensForum e.V. on the inclusion of people with disabilities
<https://www.unternehmensforum.org>
- Member of „genderdax“ for the promotion of equality
https://genderdax.de/info_plattform/commerzbank-ag/

6.3 Concluding conditions

The Standard for Responsible Procurement entered into force on October 19, 2026, replacing the Standard for Sustainable Procurement that had been in place since December 15, 2014. The contact person responsible within GM-OS CP reviews and updates all provisions and recommendations at least once a year.

The standard contract clauses "Integrity Clause" and "Human and environmental responsibility" are to be included in new contracts. The content and scope of the obligations are determined by the respective wording of the clauses.

End of the document