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Group Sustainability Report

Introduction

We live in challenging times. The tense situation in the Middle East, the ongoing Russian war of aggression in Ukraine, a weak German economy, and devastating extreme weather events and natural disasters dominated headlines in 2024. In times such as these, when society and the economy are fighting an uphill battle, it is more important than ever that we stand by our customers as a responsible partner.

Added to this, we believe that treating our employees responsibly is a key pillar of our self-image as a responsible company – even and especially in times of economic challenges and major upheavals.

We remain steadfast in our Net-Zero commitment – the promise to reduce our carbon footprint to Net-Zero – and as a financial intermediary we are driving the transformation to a sustainable economy. We follow binding rules for dealing with environmental and social risks, which we continuously review and adapt as necessary.

In the following, we explain in detail the specific ways in which we fulfil our responsibility towards the environment, society, customers and employees. We outline what matters to us and what we stand for.

The chart below summarises key activities and milestones for the 2024 reporting year.

Notes to the Group Sustainability Report

This Sustainability Report of the Commerzbank Group for the 2024 reporting year was prepared in accordance with the first set of the new European Sustainability Reporting Standards (ESRS, Delegated Regulation (EU) 2023/2772). These significantly expand the requirements governing the transparency and quality of reporting on sustainability-related topics and are applicable to large public-interest entities in the EU, which by definition includes the Commerzbank Group, for financial years beginning on or after 1 January 2024, in accordance with the Corporate Sustainability Reporting Directive (CSRD, Directive (EU) 2022/2464). Since the Federal Republic of Germany had not incorporated the CSRD into national law by the end of 2024, Commerzbank is obliged to continue to apply the CSR Directive. The Group Sustainability Report was prepared to meet the requirements of Sections 315b and 315c of the German Commercial Code (Handelsgesetzbuch, HGB) governing a consolidated non-financial statement and Section 340a (1a) HGB in conjunction with Sections 289b to 289e HGB for a non-financial statement. Commerzbank decided to publish this report as a combined consolidated non-financial report for the 2024 financial year under full voluntary application of the ESRS as a framework pursuant to Section 289d HGB as part of the Combined Management Report. This report discloses required non-financial information for both the Commerzbank Group and Commerzbank AG for the 2024 financial year. Since all aspects described apply equally to



Commerzbank AG and the Group – unless otherwise stated – there is no separate application of a framework within the meaning of Section 289d HGB for the parent company.

Reporting using the ESRS as a framework represents a formal break in continuity. We have taken this step due to the importance of the ESRS as a reporting standard adopted by the European Commission. From Commerzbank’s perspective, voluntary full application of the ESRS is the reporting method that comes closest to the spirit and purpose of the CSRD.

The CSRD stipulates that comprehensive information be provided on environmental, social and governance aspects in accordance with the ESRS. To ensure the reliability of the information provided, the CSRD requires that it undergo an external audit. With the German implementation act still pending, this audit obligation does not apply. The Supervisory Board of Commerzbank decided to subject the combined consolidated non-financial report, as part of the Management Report, to a

limited assurance engagement by the auditing firm KPMG. The report on the engagement can be found in the Group’s Annual Report under “Further information”.

The ESRS comprise a total of twelve reporting standards, consisting of two overarching standards and ten topic-specific standards, with reporting based on materiality. The overarching standards contain fundamental principles and rules for reporting and define general disclosure requirements with regard to strategies, management processes and governance structures related to sustainability. These are mandatory and can be found at the beginning of our Group Sustainability Report in the “General disclosures” section. Based on our materiality assessment, we also disclose information on climate change (E1), biodiversity and ecosystems (E4), our workforce (S1) and consumers and end users (S4), as well as our business conduct (G1). In addition, this report contains the disclosures required by EU Taxonomy Regulation 2020/852.



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General disclosures

[BP-1] General basis for preparation of the Group Sustainability Report

Scope of consolidation of the Group Sustainability Report

The Group Sustainability Report was prepared on a consolidated basis. The scope of consolidation for the Group sustainability reporting of Commerzbank AG encompasses all subsidiaries included in the consolidated financial statements for the 2024 financial year. The structure of the Commerzbank Group can be found in the disclosures under Note (69) in the Notes to the Group financial statements.

This report also includes the subsidiary Soltrx Transactions Services GmbH, which is not consolidated in the annual financial statements prepared in accordance with German commercial law. Soltrx Transaction Services GmbH is governed by an internal Commerzbank guideline on minimum standards within the framework of establishing Group-wide specifications under something referred to as the global functional lead (GFL) concept. Soltrx Transaction Services GmbH is therefore of significance for the Commerzbank Group's sustainability reporting and has been included accordingly.

mBank S.A. will additionally publish its own sustainability report for the 2024 financial year in accordance with CSRD guidelines. To avoid duplication, please refer to this report for further sustainability-related information from mBank. It is published on the mBank website.

Coverage of the upstream and downstream value chain

The value chain was analysed and defined in accordance with the requirements of the ESRS and coordinated with the relevant divisions and segments. This approach covers both the upstream and downstream value chain. The European Financial Reporting Advisory Group (EFRAG) specifies that undertakings do not have to report on each and all value chain actors. Rather, it is important to focus on the key actors and in particular to report on those actors that are relevant for analysing key impacts, risks and opportunities (IROs).

Omissions

No information relating to intellectual property, know-how or the results of innovations has been omitted. For the preparation of this Group Sustainability Report, this also applies to information about future developments or matters under negotiation.

[BP-2] Disclosures in relation to specific circumstances

Defined time horizons

There was no deviation for reporting purposes from the definitions of "short-, medium- and long-term" as defined by the ESRS. Short-term describes periods of up to one year, medium-term one to five years, and long-term more than five years.

Estimated data and measurement uncertainties

The key figures in the report are based on supporting data that in some cases are based on estimates. This concerns disclosures in ESRS E1 (Climate change), particularly in the company's own business operations, as well as selected content in ESRS E4 (Biodiversity and ecosystems). A detailed explanation of the use of estimates and approximations can be found in the relevant thematic disclosures, see in particular ESRS E1-6 "Banking: Use of the PCAF standard for carbon disclosure by financial institutions".

Upstream value chain metrics relating to disclosures on climate impacts in banking operations are typically collated using primary data. These are sometimes supplemented with statistical data or, if certain data are missing, extrapolated based on reference values.

Extrapolations are usually performed using statistical values or the Bank's own reference values. Since there are no specific emission factors for most purchased goods and services, performing calculations with a higher degree of accuracy is not possible at this point in time.

Actions for improvement include integrating more supplier data into the calculations, which is already being done on a continual basis. The quality and sources of the data are recorded, then this information is used to define actions for improvement, for example as part of the process of verifying Commerzbank AG's environmental indicators.

With regard to climate-related risks in the portfolio, there are no measurement uncertainties for quantitative indicators, as no measurements were taken for the data points used that are not

based on estimates or assumptions (proxy data). Instead, data were sourced from Commerzbank’s core database at the individual transaction level, in particular utilisations, for which no approximations or estimates were necessary. When approximations or proxy data were used from external sources, this has been indicated and reported according to the data quality score, taking into account the specific source.

For disclosures in the area of biodiversity, the process of quantifying financial impacts means that quantitative indicators and monetary amounts are subject to a high degree of measurement uncertainty. Further information on sources of estimation and outcome uncertainty can be found in ESRS E4-6.

Changes in preparation or presentation of sustainability information

Given that 2024 is the first reporting year that the Group Sustainability Report has been prepared in application of the ESRS, no changes have been made to the preparation and presentation of sustainability information compared with a prior reporting period.

Reporting errors in prior periods

With regard to first-time reporting in application of the ESRS, there are no material errors in the preparation and presentation of sustainability information in previous reports.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

No additional information based on other legislation has been included in this Group sustainability reporting.

List of ESRS disclosure requirements using incorporation by reference

ESRS disclosure requirement	See
SBM-1 paragraph 42 Detailed description of the business model	“Basis of the Commerzbank Group” section in the Management Report
Company-specific disclosure, MDR-M, information on Commerzbank’s tax burden	Country-specific reporting in the Notes to the financial statements under Note (67)

[GOV-1] The role of administrative, management and supervisory bodies

Board of Managing Directors

As of the reporting date of 31 December 2024, the Board of Managing Directors of Commerzbank Aktiengesellschaft consisted of the following six members. All members of the Board of Managing Directors are executive members.

Dr. Bettina Orlopp

- * 3 June 1970, Chief Executive Officer (CEO) and Chief Financial Officer¹ since 1 October 2024, member of the Board of Managing Directors since 1 November 2017
- **Industry experience:** Bettina Orlopp began her career in 1995 at the management consulting firm McKinsey & Company, where she was appointed partner in 2002 and specialised in advising financial institutions. This position gave her in-depth insight into the strategic and operational aspects of banking. When she moved to Commerzbank in 2014, she initially headed up corporate development and strategy, before transitioning into various board roles where she held responsibility for Compliance, Human Resources and Legal, Investor Relations, Tax, Treasury and Finance.
- **Product experience:** Bettina Orlopp has broad and extensive product experience in various areas of financial services, particularly banking, with a focus on strategy, compliance, human resources management and finance.

¹ Carsten Schmitt took over responsibility for the Group Finance, Group Investor Relations and Group Tax divisions as general representative effective 1 February 2025.

Following confirmation by the supervisory authorities, he took over the role of Chief Financial Officer as a member of the Board of Managing Directors on 19 February 2025.

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Michael Kotzbauer

- * 12 May 1968, Deputy CEO and Head of Corporate Clients since 1 October 2024, member of the Board of Managing Directors since 14 January 2021
- **Industry experience:** Michael Kotzbauer has extensive industry experience, particularly in corporate banking and German SMEs. His professional career at Commerzbank began in 1990 and has included various management positions in Germany and Asia. Since January 2021, Kotzbauer has been a member of the Board of Managing Directors of Commerzbank and is responsible for the Corporate Clients segment. His expertise in corporate banking was consolidated during his time as Divisional Board member for Mittelstandsbank, where from 2017 he assumed responsibility for the Central/East region.
- **Product experience:** Michael Kotzbauer has gained extensive product experience through various positions in the corporate customer sector in Germany and internationally.

Sabine Mlnarsky

- * 23 September 1974, Chief Human Resources Officer since 1 January 2023, Member of the Board of Managing Directors since 1 January 2023
- **Industry experience:** Sabine Mlnarsky headed the human resources department at Austria-based Erste Group Bank AG from 2016 until moving to Commerzbank. A lawyer by profession, she began her career there in HR management in 2001, before later heading up human resources at Lufthansa subsidiary Austrian Airlines from 2013 to 2016.
- **Product experience:** Sabine Mlnarsky has many years of product experience in human resources in the banking sector.

Thomas Schaufler

- * 18 July 1970, member of the Board of Managing Directors for Private and Small-Business Customers since 1 December 2021, Member of the Board of Managing Directors since 1 December 2021
- **Industry experience:** Thomas Schaufler has been working in the banking industry for almost 30 years. Among other things, he was most recently in charge of retail banking in seven European markets at Erste Group Bank AG. Before switching to Commerzbank, Thomas Schaufler was on the Management Board of Erste Group Bank AG, where he was in charge of retail banking, and a member of the Management Board of Erste Bank der österreichischen Sparkassen AG, where he was responsible for business with private and business clients.
- **Product experience:** Thomas Schaufler has many years of experience in the banking sector. His work in various management positions at Erste Group Bank AG has given him extensive product experience in the retail banking business.

Bernhard Spalt

- * 25 June 1968, Chief Risk Officer since 1 January 2024, Member of the Board of Managing Directors since 1 January 2024
- **Industry experience:** As a former member of the Management Board of Erste Group, Bernhard Spalt has many years of industry experience in various areas of risk management. He was also Chief Executive Officer of Erste Group Bank AG from 2020 to 2022. From 2002 to 2006, Spalt was Head of the Group Risk Management Division, which included responsibility for implementing Basel 2, Group Risk Control, ICAAP and Group Risk Reporting. From 2006 to 2019, as Chief Risk Officer of Erste Group Bank AG, he was responsible for all aspects of risk management in Germany, Hungary, the Czech Republic, Slovenia and Romania (among others).
- **Product experience:** Bernhard Spalt has many years of product experience in the banking sector and in the design and management of financial products.

Christiane Vorspel-Rüter

- * 24 April 1965, Chief Operating Officer since 1 September 2024, Member of the Board of Managing Directors since 1 September 2024
- **Industry experience:** Christiane Vorspel-Rüter began her career in 1990 at Andersen Consulting as a Consultant Financial Services Group. She then moved to Commerzbank AG, where she held various positions as team leader and project manager in Commerzbank IT, and most recently served as CIO in Investment Banking & International Group Services IT. From 2018 to 2024 she was Group Executive responsible for IT at Landesbank Baden-Württemberg.
- **Product experience:** Christiane Vorspel-Rüter has many years of product experience and has held a wide range of management functions, particularly in the IT sector.

The Board of Managing Directors is composed of 50% women and 50% men.

Supervisory Board

Commerzbank AG's Supervisory Board consists of 20 members. All members of the Supervisory Board are non-executive members.

Prof. Dr. Jens Weidmann

- * 20 April 1968, Chairman of the Supervisory Board since 31 May 2023
- **Industry experience:** Prof. Dr. Jens Weidmann has held various positions in the financial field, both nationally and internationally. His professional career has included positions at the International Monetary Fund, in the German Federal

Chancellery, as President of the Deutsche Bundesbank and as Chairman of the Board of Directors of the Bank for International Settlements. In June 2023 he was appointed to the Government Commission on the German Corporate Governance Code. He also has expertise in the responsible supervision and regulation of banks, as well as extensive experience in financial and economic policy and in the field of environmental, social, and governance (ESG) dimensions, partly through his involvement in foundations. Moreover, he is a member of the Supervisory Board of Munich Re and teaches in the Finance Department of the Frankfurt School of Finance and Management.

- **Membership of committees:** Prof. Dr. Jens Weidmann is Chairman of the Presiding and Nomination Committee, the Special Committee² and the Compensation Control Committee. He is also a member of the Audit Committee and the Risk Committee.

Uwe Tschäge

- * 28 April 1967, Deputy Chairman of the Supervisory Board since 30 May 2003
- **Industry experience:** Uwe Tschäge is a banker by profession and has held various positions on the Works Council. Since 2002 he has been Chairman of the Central Works Council and the Group Works Council.
- **Membership of committees:** Uwe Tschäge is a member of the Presiding and Nomination Committee, the Compensation Control Committee, the Environmental, Social and Governance (ESG) Committee and the Mediation Committee. He stepped down from the Supervisory Board of Commerzbank AG on 31 December 2024.
- **Employee representative**

Heike Anscheid

- * 19 January 1971, Member of the Supervisory Board since 1 January 2017
- **Industry experience:** Heike Anscheid is a banker by profession and has worked in various positions at Commerzbank AG. She has been a full-time member of the Works Council member since 2002, before which she worked as an administrator in the division for third-country letters of credit.
- **Membership of committees:** She is a member of the Committee for Digital Transformation.
- **Employee representative**

Gunnar de Buhr

- * 29 October 1967, Member of the Supervisory Board since 19 April 2013
- **Industry experience:** Gunnar de Buhr is a banker by profession and has held various positions on the Works Council. Since June 2023 he has been Chairman of the Hamburg Works Council. He is a member of the Central Works Council and the Central Works Committee and is also spokesperson for the Economic Committee. In addition, Gunnar de Buhr is a member of the supervisory boards of the following entities: BVV Versicherungsverein des Bankgewerbes a.G., BBV Versorgungskasse des Bankgewerbes e.V., BB Pension Management GmbH and BBV Pensionsfonds des Bankgewerbes AG.
- **Membership of committees:** He is a member of the Audit Committee and the Committee for Digital Transformation.
- **Employee representative**

Harald Christ

- * 3 February 1972, Member of the Supervisory Board since 31 May 2023
- **Industry experience:** Harald Christ has many years of experience serving on supervisory boards and executive boards in various industries. Since 2018 he has been Managing Partner of Christ & Company Consulting GmbH in Berlin. He also has extensive expertise in supporting, monitoring and implementing business, restructuring and consolidation programmes and in developing positioning and access strategies for new business and cooperation targets. Moreover, he has occupied management and control functions in the fields of banking, building societies and insurance.
- **Membership of committees:** Harald Christ is a member of the Audit Committee, the Committee for Digital Transformation and the Environmental, Social and Governance (ESG) Committee.

Dr. Frank Czichowski

- * 17 February 1960, Member of the Supervisory Board since 13 May 2020
- **Industry experience:** Dr. Frank Czichowski has many years of experience in managing a national development bank and in serving on supervisory boards of international financial service providers and special interest organisations. In addition, he has in-depth knowledge of the international financial markets and international organisations as well as special ESG expertise, which he gained through his operational activities and further training. He is a former Senior Vice President/Treasurer of the KfW Banking Group, a member of the Board of Directors of FMS Wertmanagement AöR in Munich since February 2023, a member of the Supervisory Board of Frontclear

² Not a permanent committee since September 2024.

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Clearing Corporation in Amsterdam since April 2023, and a member of the Board of Directors of Landwirtschaftliche Rentenbank, Frankfurt/Main, since July 2024. He has extensive knowledge of treasury, capital markets, securitisation and financial asset management.

- **Membership of committees:** Dr. Frank Czichowski is a member of the Risk Committee, the Audit Committee, the Committee for Digital Transformation, the Special Committee and the Environmental, Social and Governance (ESG) Committee.

Sabine U. Dietrich

- * 19 April 1960, Member of the Supervisory Board since 30 April 2015
- **Industry experience:** Sabine U. Dietrich has in-depth engineering and management experience in global listed companies and a comprehensive understanding of economic correlations and business models. She is a former Member of the Management Board of BP Europe SE. She also has extensive experience in the areas of transformation, innovation, risk management, compliance and governance, including developing and implementing an operating management system in Europe.
- **Membership of committees:** Sabine U. Dietrich is Chairwoman of the Committee for Digital Transformation and a member of the Environmental, Social and Governance (ESG) Committee.

Dr. Jutta A. Dönges

- * 9 May 1973, Member of the Supervisory Board since 13 May 2020
- **Industry experience:** Dr. Jutta A. Dönges has in-depth and cross-industry experience in investment banking, especially in corporate finance, M&A transactions and capital market transactions, as well as in investment management, financial restructuring and sustainable finance. In addition, she has extensive knowledge of the banking and financial system, business models, regulation, supervision and resolution of banks and infrastructure providers at national and EU level. She also has a comprehensive understanding of finance and risk management. She has been Chief Financial Officer of Uniper SE since March 2023.
- **Membership of committees:** Dr. Jutta A. Dönges is a member of the Presiding and Nomination Committee, the Compensation Control Committee, the Risk Committee, the Special Committee and the Mediation Committee.

Burkhard Keese

- * 29 January 1966, Member of the Supervisory Board since 18 May 2021
- **Industry experience:** Burkhard Keese has extensive experience in finance and the auditing of large international and

capital market-oriented financial service companies. He has had a longstanding career in international finance as CFO and advisor of globally operating enterprises. He also has in-depth knowledge on the transformation and implementation of digital and customer-oriented business models. Since April 2019 he has been Chief Financial Officer and a member of the Council of Lloyd's of London.

- **Membership of committees:** Burkhard Keese is Chairman of the Audit Committee and is a member of the Risk Committee and the Special Committee.

Maxi Leuchters

- * 25 January 1994, Member of the Supervisory Board since 31 May 2023
- **Industry experience:** Maxi Leuchters has expertise in the areas of co-determination and corporate governance as well as in the fields of sustainable finance and ESG. Since 2019 she has been Head of Department for Corporate Law and Management at the Hans Böckler Foundation in Düsseldorf.
- **Membership of committees:** Maxi Leuchters is a member of the Environmental, Social and Governance (ESG) Committee and the Special Committee.
- **Employee representative**

Daniela Mattheus

- * 9 May 1972, Member of the Supervisory Board since 18 May 2021
- **Industry experience:** Daniela Mattheus is a lawyer and management consultant, proven governance expert and supervisory board expert by virtue of her longstanding career in the field of governance, risk & compliance at major international audit and consulting firms. She also has extensive knowledge of the legal framework for companies with international operations (including banks) as well as extensive experience in the analysis of corporate structures and business models. Through her work as chairwoman of various audit committees, Daniela Mattheus also has up-to-date knowledge and experience in the areas of accounting, auditing and sustainability reporting. Her many years in academia included teaching in the areas of corporate and internal governance, ESG, regulatory law and auditing.
- **Membership of committees:** Daniela Mattheus is a member of the Committee for Digital Transformation and the Environmental, Social and Governance (ESG) Committee.

Nina Olderdissen

- * 21 August 1976, Member of the Supervisory Board since 31 May 2023
- **Industry experience:** Nina Olderdissen is a banker by profession and qualified individual customer advisor, and has served in various functions on the Works Council. Since 2018 she has

been Deputy Chairwoman of the Essen Works Council. She has also been Deputy Chairwoman of the Committee for Education and Training of the Central Works Council since 2006.

- **Membership of committees:** Nina Olderdissen is a member of the Environmental, Social and Governance (ESG) Committee.
- **Employee representative**

Sandra Persiehl

- * 11 April 1975, Member of the Supervisory Board since 31 May 2023
- **Industry experience:** Sandra Persiehl is a bank employee. She has been a full-time member of the Works Council since 2011 and a member of the Central Works Council and the Committee for People, Organisation and Technology since 2020.
- **Membership of committees:** Sandra Persiehl is a member of the Committee for Digital Transformation and the Audit Committee.
- **Employee representative**

Michael Schramm

- * 5 April 1974, Member of the Supervisory Board since 31 May 2023
- **Industry experience:** Michael Schramm is a banker by profession, holds a degree in business administration and has held various positions at Commerzbank AG. Since 2015 he has been branch manager of Large Corporates in Düsseldorf. He is a member of the Senior Staff Spokesmen's Committee.
- **Membership of committees:** Michael Schramm is a member of the Committee for Digital Transformation, the Special Committee and the Risk Committee.
- **Employee representative**

Caroline Seifert

- * 10 July 1966, Member of the Supervisory Board since 18 May 2021
- **Industry experience:** Caroline Seifert is a transformation management consultant in Bonn and has extensive transformation management experience in dynamically evolving markets. She has a longstanding international career as a manager at global tech companies with a focus on design development and the customer experience. She is also an expert in the field of platform economies and digitalisation.
- **Membership of committees:** Caroline Seifert is a member of the Committee for Digital Transformation.

Dr. Gertrude Tumpel-Gugerell

- * 11 November 1952, Member of the Supervisory Board since 1 June 2012
- **Industry experience:** Dr. Gertrude Tumpel-Gugerell has many years of experience on the management and supervisory boards of listed companies. She is a former Member of the Executive Board of the European Central Bank. She has in-depth experience on matters related to banking regulation and the regulatory framework. She also has extensive experience in auditing financial institutions and long-term strategic planning, as well as special expertise in the field of ESG gained in her capacity as a supervisory board member and through further training.
- **Membership of committees:** Dr. Gertrude Tumpel-Gugerell is Chairwoman of the Environmental, Social and Governance (ESG) Committee and a member of the Presiding and Nomination Committee.

Sascha Uebel

- * 17 August 1976, Member of the Supervisory Board since 31 May 2023
- **Industry experience:** Sascha Uebel is a banker by profession. Since 2016 he has been a full-time member of the Works Council and member of the Central Works Council. Since 2022 he has held the office of Deputy Chairman of the Central Works Council and the Group Works Council and is a member of the Economic Committee.
- **Membership of committees:** Sascha Uebel is a member of the Presiding and Nomination Committee, the Special Committee and the Audit Committee.
- **Employee representative**

Frederik Werning

- * 4 March 1990, Member of the Supervisory Board since 30 April 2024
- **Industry experience:** Frederik Werning is a banker by profession and is currently trade union secretary in the Section for Banking at ver.di District Münsterland.
- **Membership of committees:** Frederik Werning has knowledge of trade union activities and is a member of the Environmental, Social and Governance (ESG) Committee.
- **Employee representative**

Frank Westhoff

- * 12 June 1961, Member of the Supervisory Board since 18 May 2021
- **Industry experience:** Frank Westhoff has extensive knowledge of the European banking market, especially in the corporate and real estate-oriented client business. In addition, he has considerable experience in the area of financial and risk management of large banks as a longstanding risk officer

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of one of the largest German banks. He has amassed extensive supervisory board experience as a member and chairman of supervisory boards of various companies in the financial sector. He is a former member of the Board of Managing Directors of DZ BANK AG. He has a longstanding career in banking with experience in customer service, risk and bank management as well as the monitoring of strategy and consolidation programmes.

- **Membership of committees:** Frank Westhoff is Chairman of the Risk Committee and a member of the Audit Committee, the Special Committee and the Compensation Control Committee.

Stefan Wittmann

- * 4 November 1968, Member of the Supervisory Board since 8 May 2018
- **Industry experience:** Stefan Wittmann has many years of experience as a trade union secretary. He currently serves as union secretary of the ver.di Trade Union National Administration.
- **Membership of committees:** He is a member of the Compensation Control Committee and the Mediation Committee. Stefan Wittmann stepped down from the Supervisory Board of Commerzbank on 31 December 2024.
- **Employee representative**

The percentage of female Supervisory Board members is 45%, while the percentage of male Supervisory Board members is 55%.

As provided for in Section 7 of the German Act on the Co-Determination of Employees (Co-determination Act) (Gesetz über die Mitbestimmung der Arbeitnehmer (Mitbestimmungsgesetz), MitbestG), the Supervisory Board of Commerzbank AG is composed of 50% shareholder representatives and 50% employee representatives.

Nine of the ten shareholder representatives are considered independent within the meaning of the German Corporate Governance Code, as can be seen from the table in the “Supervisory Board” section of the declaration on corporate governance pursuant to Section 315d HGB) in this Annual Report. The proportion of independent Supervisory Board members elected by the Annual General Meeting is 90%.

The members of both the Board of Managing Directors and the Supervisory Board have experience regarding the geographical location of the company through their professional activities in Germany and, in some cases, in an international context.

Role of the administrative, management and supervisory bodies responsible for monitoring impacts, risks and opportunities

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 Board of Managing Directors develops the Commerzbank Group’s strategy, discusses it with the Supervisory Board and ensures it is implemented. The members of the Board of Managing Directors bear joint responsibility for managing the company. They keep each other informed about all important processes and actions within their area of responsibility. 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. Each member of the Board of Managing Directors is responsible for implementing sustainability actions within their own divisional remit.

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 three strategic sustainability targets. Information on Commerzbank’s sustainability targets can be found in ESRS SBM-1. In addition, the Bank’s divisions and segments regularly report on the progress of their sustainability activities, also in the context of material impacts, risks and opportunities and implementing regulatory sustainability requirements. The Group Sustainability Board is chaired by the Chairwoman of the Board of Managing Directors. She is joined on the Board by other members of the Board of Managing Directors, Executives, the Chief Environmental Risk Officer and the Chief Sustainability Officer.

By making Group Sustainability Management the overarching sustainability area within the Group division for Strategy, Transformation and Sustainability, Commerzbank is underlining the strategic priority of this topic. The division reports to the Chairwoman of the Board of Managing Directors and regularly informs her about progress on sustainability issues and activities. It 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. The programme ensures close coordination of cross-cutting issues. A steering committee consisting of members of the top management of the relevant divisions monitors progress every two months.

It also ensures the implementation of strategic sustainability initiatives such as the Principles for Responsible Banking of the UNEP FI. In cooperation with the relevant business areas, Group Sustainability Management defines the impacts, risks and opportunities that are to be assessed as part of the materiality assessment.

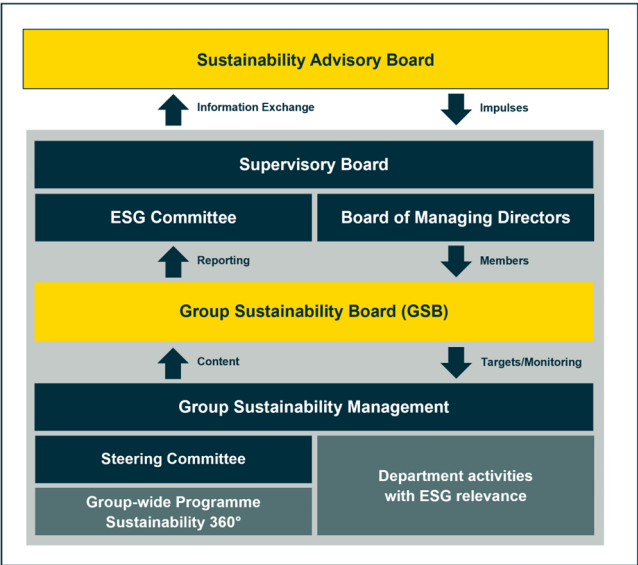
Since 2022 the external Sustainability Advisory Board, led by the Chairwoman of the Board of Managing Directors, has ensured a constructive and critical dialogue with our stakeholders. The five to six experts, appointed for a term of office of three years, hail from the fields of politics, academia, society, NGOs and SMEs and represent a broad spectrum of content. Topics discussed in previous meetings included biodiversity, social sustainability, greenwashing risks and current developments in politics and society. The input from the Sustainability Advisory Board supports us in developing our sustainability strategy and also encourages a critical examination of existing projects and goals. The specialist expertise of the Advisory Board members was also incorporated into the assessment of impact materiality in our materiality assessment and in the first edition of our ESG framework.

The key impacts, risks and opportunities are defined and monitored and subjected to appropriate controls and procedures within the framework of the responsibilities of the organisational structure described. Functional responsibility is delineated by the respective Group divisions. A description of specific procedures and responsibilities as they pertain to the material topics is provided below in the disclosure section of this report.

Sustainability-related expertise

By virtue of their function, the Bank’s management and supervisory bodies have specialist expertise in many areas. This is expanded on a continual basis, for example through sustainability-related training courses. The members of the Board of Managing Directors receive training on sustainability topics as events dictate, but at least once a year. This includes, in particular, information on managing ESG risks. The Group Sustainability Board can also be used as a forum for training and the targeted transfer of specialist knowledge. The Sustainability Advisory Board serves as an additional source of expertise on matters relating to sustainability. Depending on the topics on the agenda, meetings of the Sustainability Advisory Board, which are chaired by the Chairwoman of the Board of Managing Directors, may additionally be attended by another member of the Board of Managing Directors and employees from their department. This ensures that both Board members and those responsible for the issues at the operational level can benefit from the expertise and specialist knowledge of the Advisory Board members.

Members of the Supervisory Board undertake the training and development measures required for their duties at their own initiative, with appropriate support from Commerzbank. In addition, new Supervisory Board members are offered individually tailored internal training and induction measures. Furthermore, areas such as Group Risk Management provide in-depth insights into their activities and organisation. In the 2023 financial year, a comprehensive workshop on the topic of “The EU Taxonomy and Commerzbank’s progress in implementing it” was held for all members of the Supervisory Board. In summer 2024, both the Supervisory Board and the Board of Managing Directors were trained on the requirements and implementation guidelines of the CSRD.



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[GOV-2] Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The committees described above regularly address sustainability matters. The Group Sustainability Board generally meets six times a year. Preparations for the meetings are made by Group Sustainability Management. As the coordinating unit, it oversees the meetings of the Group Sustainability Board in terms of the selection of topics, preparation, provision of information, execution and documentation.

In the 2024 financial year, the Group Sustainability Board dealt with environmental issues at each of its meetings. For example, frequent discussions were held on the Bank's goal of reducing carbon emissions from banking operations to Net-Zero by 2040 and the measures initiated and implemented to achieve this. The management system set up by the Bank to reduce emissions from the loan portfolio was another subject of discussion by the Group Sustainability Board. On the topic of biodiversity, the Board addressed the progress made in the Bank's environmental risk management in terms of integrating environmental risks beyond previously established measures to manage climate-related risks.

The Group Sustainability Board also regularly discussed and reached decisions on social issues. The working conditions of the company's workforce is one essential aspect of managing the implementation of the employee strategy and was accordingly addressed by the Group Sustainability Board on multiple occasions. Employee training and development was another regular topic of discussion in this committee, particularly with regard to actions concerning ESG issues.

The Group Sustainability Board addressed aspects related to product responsibility as well. The Group Sustainability Board's deliberations focused on products related to sustainability and supporting sustainable transformation in the Corporate Clients and Private and Small-Business Customers segments, as well as the analysis of possible greenwashing risks in connection with statements made and products offered by the Bank.

Within the Supervisory Board, sustainability-related issues are discussed in particular by the ESG Committee. This committee normally meets four times per year. The content of the ESG Committee meetings is prepared by Group Sustainability Management and Group Human Resources, together with other specialist departments as appropriate.

The ESG Committee addressed climate and environmental issues at each of its meetings in 2024. For example, it advised Commerzbank on its new position on deforestation, which aims to counteract deforestation in connection with its financing activities. Further information can be found in ESRS E4-3 and E4-4. This directive had previously been discussed and adopted by the Bank's Board of Managing Directors at the end of 2023. In addition, the ESG Committee discussed the achievement of the Bank's goal of reducing carbon emissions from banking operations to Net-Zero by 2040 and the actions initiated and implemented to achieve this.

Social issues were also prominent on the ESG Committee's agenda in 2024. The matters discussed included Commerzbank's employee networks and the Bank's actions to promote workforce diversity as a key factor of the Bank's long-term success. Other subjects of deliberation by the Committee included employee satisfaction, which is measured at Commerzbank using the Employee Engagement Index, as well as training for Commerzbank employees, particularly in connection with ESG issues. Further information on these topics can be found in the social standards.

With regard to Commerzbank's product offering in support of a sustainable transformation, the ESG Committee was regularly informed and included in the consultation process used to revise our management parameter for product sustainability. Further information can be found in the entity-specific disclosure on the €300bn target, which is the most recent disclosure regarding environmental standards.

In principle, the Board of Managing Directors receives all documents sent to the ESG Committee of the Supervisory Board in advance for consultation.

During the reporting year, the Board of Managing Directors and the Supervisory Board devoted a great deal of time and effort to preparing the first materiality assessment in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD). Firstly, both committees received training on the CSRD from a university professor who is a member of EFRAG (among others); and secondly, they were informed regularly about the materiality assessment's implementation status and, subsequently, its results. At its meeting in October 2024, the Board of Managing Directors approved the results of the materiality assessment and, consequently, also the material impacts, risks and opportunities for Commerzbank identified for the first time in accordance with the requirements of the CSRD. The results were presented to the Supervisory Board in November.

In 2024, the activity and status report compiled by the Data Protection Officer was presented to the responsible Management Board, led by the responsible member of the Board of Managing Directors, for their information on two separate occasions.

A complete list of all impacts, risks and opportunities identified as material in the materiality assessment can be found in ESRS SBM-3.

[GOV-3] Integration of sustainability-related performance in incentive schemes

As part of the remuneration system for the Board of Managing Directors, in 2023 the Supervisory Board 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.

The 20% ESG sub-target of the Group target for the 2024 financial year is composed as follows:

Composition of the ESG sub-target

Subject area	Weighting	Specific target
Environment	60%	<ul style="list-style-type: none">Reduction of the carbon intensities of the eight SBTi sector portfolios in accordance with the SBTi commitment (50% weighting)Reduction of carbon emissions from Commerzbank AG’s own banking operations by 5% (50% weighting)
Social	20%	<ul style="list-style-type: none">Increase in the proportion of women in management positions at Commerzbank AG in Germany across all management levels
Governance	20%	<ul style="list-style-type: none">Actively setting an example and promoting corporate values and the culture of integrity as well as strengthening cooperation within the Board of Managing Directors

The emissions reported in ESRS E1-6 are currently not used to measure the achievement of the Board of Managing Directors’ target for reducing the total carbon emissions of Commerzbank AG’s own banking operations, as these were collected for the entire Group for the first time for the 2024 financial year. For the current 2024 reporting year, the data for measuring target achievement were collected using the methodology applied in previous years in order to ensure consistency with prior reference values.

Further information can be found in the remuneration report for the Board of Managing Directors and the Supervisory Board, which is published as a separate report and can be found on the Commerzbank website.

[GOV-4] Statement on due diligence

Due diligence is a core component Commerzbank’s commitment to acting responsibly. It describes the systematic process by which we determine how we manage and account for the potential and actual positive and negative impacts as well as the opportunities and risks of our business activities on the environment and society.

The central aspects of this process are described in international instruments such as the United Nations Guiding Principles on Business and Human Rights and the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD). Below is an overview of how and where application of the main aspects and steps of the due diligence process are reflected in our Group Sustainability Report.

Mapping of the main aspects and steps of the due diligence process

Core elements of due diligence	Paragraphs in the Group Sustainability Report
Embedding due diligence in governance, strategy and business model	i. GOV-2: Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies, ii. GOV-3: Integration of sustainability-related performance in incentive schemes, and iii. SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.
Involving affected stakeholders in all main aspects and steps of the due diligence process	i. GOV-2, ii. SBM-2: Interests and views of stakeholders, iii. IRO-1 and iv. topic-related ESRS: Considering the different stages and purposes of involving stakeholders throughout the entire due diligence process.
Identifying and assessing negative impacts	i. IRO-1 (including application requirements related to specific sustainability matters in the relevant ESRS) and ii. SBM-3.
Actions for reducing negative impacts	i. topic-related ESRS: Considering the range of actions, including transition plans, to address the impacts.
Tracking the effectiveness of these efforts and communicating relevant information	i. topic-related ESRS: in relation to key performance indicators and objectives.

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[GOV-5] Risk management and internal controls over Group sustainability reporting

As part of Group sustainability reporting under the CSRD, the Bank has implemented a risk management and internal control system aimed at promoting the integrity and reliability of our reporting processes. Our approach includes identifying and assessing risks that may impact our Group sustainability reporting. We attach particular importance in this regard to involving relevant departments, with the overriding goal of identifying and mitigating potential risks. Through our formalised CSRD reporting process, we supplement the overarching data collection policy and structure the individual process steps into a standardised, logical sequence with clear responsibilities and control functions as part of an annual update process. Our established controls include an annual review to assess compliance with reporting standards and the validity of the data collected.

We use a qualitative approach to risk assessment. Risks are prioritised according to their potential impact and likelihood of occurrence in order to derive and develop targeted actions to reduce risks. The internal control systems focus on the accuracy and completeness of the reported data and support compliance with regulatory requirements.

The main risks identified concerned data integrity, regulatory compliance and transparency. Commerzbank's mitigation strategies include implementing robust controls and holding regular information events for employees to ensure the overall quality of reporting. The controls we apply relate in particular to greenwashing risk, which is directly related to data validity. Various control steps have been implemented along the entire data flow with a view to reducing risks.

After the end of the first reporting year, both the risk assessment and the internal controls are evaluated, and the results of this evaluation are taken into account and subsequently integrated into all relevant internal functions and processes (the precise manner is yet to be defined). The potential impacts and probabilities of occurrence of the identified risks are regularly assessed and incorporated into the risk reports compiled for management. In addition, the results of the risk analysis are used to evaluate the effectiveness of the control measures and expand or narrow the scope of these controls if necessary. Care is also taken to ensure that risks are prioritised according to their relevance and that appropriate resources are allocated to the most important control measures.

In particular, the Audit Committee of the Supervisory Board was provided with a detailed overview of the internal control system put in place to ensure high data quality in the Sustainability

Report. The Board of Managing Directors and the Supervisory Board furthermore receive annual updates on the effectiveness of the internal control system as determined by these results.

[SBM-1] Strategy, business model and value chain

Key elements of the general strategy that relate to or affect sustainability matters

Combating climate change and the loss of biodiversity requires not only favourable political conditions and technical solutions, but above all adequate financial resources. This poses numerous opportunities for us as a bank: the energy revolution and reduction in carbon emissions are creating a need for new technologies and products requiring large investments by our customers. 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 revolution. In addition, interest in sustainable investment opportunities is growing, which is why we are developing products and services along our core customer groups – Private and Small-Business Customers and Corporate Clients – that take account of these changes while offering an environmental or social benefit.

Commerzbank serves a wide range of markets. It is present internationally in more than 40 countries in the corporate banking business, with a particular focus on German SMEs, large companies and institutional customers. In the international business, the Bank supports clients with a business relationship to Germany, Austria and/or Switzerland and companies in selected future-oriented industries. In the Private and Small-Business Customers segment, the Bank serves its customers through the Commerzbank and comdirect brands. A detailed disclosure on the business model can be found in the "Basis of the Commerzbank Group" section in the Management Report.

To achieve our business objectives across diverse markets, we maintain a global presence that is mirrored in our internationally diverse workforce. The following table provides an overview of the headcount of employees by geographical area.

Headcount of employees by geographical area

Region	Number of employees
America	263
Asia	1,108
Continental Europe (including the United Kingdom)	38,862
Total	40,233

We offer our customers sustainable financing solutions as well as investment and capital market products. On the financing side, these include sustainable bilateral credit products, known as sustainable loans, which our corporate customers can use to finance sustainability-related projects. In the Private and Small-Business Customers segment, the offering encompasses financing for energy-efficient buildings in the form of green mortgage loans. As part of this scheme, Commerzbank extends more favourable financing conditions if the loan is used for the construction, modernisation or acquisition of buildings – for own or third-party use – whose energy consumption does not exceed 50kWh per square metre of usable floor space and year.

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, subject to the requirements of the Markets in Financial Instruments Directive (MiFID).

In our ESG framework, we provide a detailed overview of our sustainability-related products and their classification criteria.

In addition to developing traditional banking products, it is equally important to us that the services we offer not only cater to the needs of our customers, but also create added value. In recent years, we have introduced new products and services with particular customer benefits. These include the Impact Solutions platform, a network comprising over 90 verified providers of solutions in the area of sustainability, and the Financial Compass, which uses the “act sustainably” approach to promote environmental and social factors in financial matters.

Commerzbank has no investment exposure to direct sales in activities related to fossil fuels, in the area of controversial weapons (defined by the ESRS as anti-personnel mines, cluster munitions, and chemical and biological weapons), in the manufacture of chemicals, or in the cultivation and production of tobacco.

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 pursue this by means of three specific targets:

- We aim for Net-Zero carbon emissions from our entire loan and investment portfolio by 2050.
- We want to reduce the carbon emissions of our own banking operations to Net-Zero as early as 2040. We expect our suppliers to be climate-neutral by 2040.
- By 2025 we will mobilise €300bn for sustainable financial products (see also the entity-specific disclosure on the €300bn target).

Sustainability has been an integral part of our corporate strategy since as far back as 2020. With the Strategy 2027 applicable to the reporting year, the topic of responsibility was anchored throughout the Group and further developed accordingly in the “Momentum” strategy upgrade in February 2025. The high ambitions with regard to ESG issues remain unchanged with the updated strategy.

At the heart of our sustainability strategy is our commitment to becoming a Net-Zero bank. This applies both to our own operations as well as to our loan and investment portfolio. To achieve this goal, we provide our customers with innovative product solutions and actively support them in their transformation towards sustainability. We are also driving forward the sustainable transformation of our banking operations. We take a holistic approach to this commitment and work together with all employees to manage sustainability across all relevant areas of the Bank. In our ESG framework, we disclose all the key components of our sustainability strategy and make sustainability a central management parameter.

Alongside our activities to combat climate change, we tackle issues that are moving into the focus of the sustainability debate, such as biodiversity protection. We need to collaborate with our customers to find strategic solutions to these challenges. 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) and participating in the pioneering project “Risks and Opportunities Related to Biodiversity for the Financial Sector”, 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 on our homepage.

Inputs and outputs

Commerzbank uses a variety of inputs to support its business processes. In addition to the players in the upstream value chain who supply us with products and services, our employees, our network of branches and customer centres, and our technological

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infrastructure also represent important inputs for Commerzbank.

Our upstream value chain includes product suppliers, the providers of financial services and refinancing, suppliers and other service providers. These partners are critical to our ability to deliver our products and services.

Our employees are pivotal to our success. Their expertise and their commitment make a major contribution to our ability to achieve our business objectives, which makes them our most important inputs. By providing continuous training and a supportive work environment, we foster their development and satisfaction, which directly impacts the quality of our services. Detailed reporting on topics relating to the company's own workforce can be found in ESRS S1.

Our branches, customer centres and self-service terminals are optimally geared to meeting the needs of our customers. They not only provide access to our services, but also personalised advice and support. These facilities are strategically located to ensure broad accessibility and maximise customer satisfaction.

A robust IT network and efficient processes are essential for meeting modern customer requirements. Our IT infrastructure is optimised to execute our services smoothly and securely, from transaction processing through to data security. Through ongoing investments in technology and process optimisations, we ensure that we are always state of the art and are able to meet the growing expectations of our customers.

Commerzbank's outputs and results can be found in the downstream value chain, comprising various channels, products and services created specifically to meet our customers' needs. Product outputs include current accounts that provide easy and secure access to banking services – designed to make our customers' everyday lives easier and increase their financial security.

Key outputs include loans, investments and investment products that help our customers achieve their financial goals. By enabling access to financial services, we foster financial inclusion and support economic development, contributing to the overall social and economic participation of our customers and helping achieve positive impacts as outlined in ESRS S4. Detailed reporting can be found in ESRS S4.

Main features of the upstream and downstream value chain, including a description of the main business actors

The value chain essentially comprises direct and indirect actors. The Group's sustainability reporting focuses on the key stakeholders for this purpose: the direct actors.

The upstream value chain includes all products, including external resources and services, used to help develop Commerzbank's products or services, such as suppliers, investors and service providers. The main actors and products in the upstream value chain at Commerzbank are investors, product suppliers and financial service providers, the refinancing structure, as well as other suppliers and service providers. Commerzbank has a broadly diversified shareholder base. Institutional investors play a particularly important role here, as do private shareholders as well as the Federal Republic of Germany and the UniCredit Group as a major shareholder. Product suppliers are Commerzbank's cooperation partners that are outside the CSRD scope of consolidation. These include product suppliers for investment products that are not issued by Commerzbank but are marketed by the Bank, or insurance solutions that are offered by cooperating insurers and are distributed by Commerzbank. Financing partners that offer financing together with Commerzbank in the capacity of consortium partners also belong to this group. Commerzbank's refinancing structure includes, for example, subordinated debt, preferred senior issues, non-preferred senior issues and covered bonds. In addition, Commerzbank has the option of issuing secured funding instruments, in particular mortgage Pfandbriefe and public Pfandbriefe. Refinancing through central banks is also of great relevance here.

The downstream value chain includes all actors and activities that receive products or services from the company and process these further or pass them on to end customers, most notably distributors, retailers and end customers. Commerzbank divides its downstream value chain into the following categories: channels, customers and products/services. The channels – or sales channels – are the various ways the Bank brings its offerings to market. The "customers" category is geared directly to Commerzbank's target group. Separating customers into their own category allows us to better understand their needs, habits and preferences. The "products/services" category comprises Commerzbank's actual product range. Delineating this as its own category facilitates management and further development of the solutions offered and ensures that the products and services meet the requirements of the market and target customers.

[SBM-2] Interests and views of stakeholders

For us, corporate responsibility means seeking regular dialogue with external and internal stakeholders. That's why another key focus of our Strategy 2027 is customers, employees, investors and their respective expectations. 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 this engagement can be incorporated into the corporate strategy as a decision-making and planning aid.

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. Commerzbank also engages in regular dialogue with national and international regulatory and supervisory authorities. 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.

Commerzbank is also actively involved in industry consultation initiatives to develop solutions to shared challenges. In October 2024 Commerzbank hosted one of the two events held during the eighth 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 topics such as collaboration between the real and financial economies as well as the key role this collaboration will play in transforming the economy.

To promote mutual dialogue with our stakeholders, we are also in regular communication with the Bank's Sustainability Advisory Board, as described in ESRS GOV-1.

Tracking the interests and views of stakeholders

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. One of the bases used to identify the entity-specific topics was a gap analysis carried out as part of the CSRD project in 2023. This involved comparing the topic-specific requirements of the ESRS with Commerzbank's existing sustainability publications, and discussing the findings with the relevant departments in order to identify possible disclosures and sustainability topics relevant to the business model that are not covered by the ESRS or are not covered in sufficient detail, and to define these as company-specific disclosures. The results of the analysis and therefore the constructive feedback and input gained from our stakeholders within the context of reviewing our business model are incorporated into the Bank-wide strategy process and have an influence on our reporting. Further details on the materiality assessment performed can be found in ESRS IRO-1.

Commerzbank maintains an active dialogue with its stakeholders and incorporates the gathered input and ascertained requirements into planning and developing the strategy and business model.

Topics from the market environment are also observed and incorporated accordingly. The Bank's strategy process helps develop a better understanding of the business environment. This process involves assessing all essential internal as well as external dimensions that could be decisive for the Bank's strategic direction moving forward, including an evaluation of the Bank's prevailing business environment and a qualitative analysis of current factors within the business model. Findings from the materiality assessment can also be applied as needed as they pertain to sustainability issues.

In order to take into account the interests and views of our stakeholders, our approach in product development includes not only agile methods, but also direct dialogue with customers. The products prioritised for development are determined by the requirements of the Bank's own strategy (including its sustainability strategy), economic considerations, regulatory requirements and customer needs. When integrating ESG aspects into our products, services and advisory processes, in future we will focus not only on the subject of climate, but also on other topic areas identified in the materiality assessment such as biodiversity.

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Informing the administrative, management and supervisory bodies about the views and interests of affected stakeholders

Both the Board of Managing Directors and the Supervisory Board are notified through different formats about the views and interests of affected stakeholders with regard to the company's sustainability-related impacts.

For example, the external Sustainability Advisory Board is led by the Chairwoman of the Board of Managing Directors. A summary of the topics discussed in this board is presented to the Group Sustainability Board and to the ESG Committee of the Supervisory Board. By directly involving stakeholders from various areas, we offer a holistic perspective of environmental, social and governance aspects and provide an interface to our management and supervisory functions.

In addition, the views of our stakeholders within the context of Commerzbank's sustainability-related impacts, for example within the context of the materiality assessment, are addressed on an ad hoc basis at both Board and executive level in the Group Sustainability Board as well as in the ESG Committee of the Supervisory Board.

Incorporating the interests of employees into strategy and business model

Commerzbank is aware that its business model and strategy have an impact on its own employees. The Group has committees and bodies that represent the interests and perspectives of the workforce. Details on this can be found in ESRS S1 SBM-3.

Commerzbank AG's Supervisory Board advises and monitors the Board of Managing Directors in its management of the company and is directly involved in decisions of fundamental importance.

It consists of equal numbers of shareholder representatives appointed by the Annual General Meeting and employee representatives. This means that the interests of employees are represented at the highest level.

The Group Works Council is an important body for employee representation at Commerzbank. It ensures that the interests of employees are taken into account at Group level and strengthens co-determination and social dialogue within the Commerzbank Group. Details can be found in ESRS S1-2, S1-3 and S1-8.

Incorporating the interests of consumers and end-users into strategy and business model

Our stakeholders in the sense of consumers and end-users are our private customers who request financial services from Commerzbank for their private lives. Our product range encompasses investments, lending, pensions, accounts and payment transactions. Our customers can choose which channel they want to use to contact us (when contacting advisory services, for example). Our customers expect us to conduct ourselves with professionalism, respect and integrity in a way that takes their needs and interests into account. We use special customer/user experience surveys (CX/UX) to get selected customers involved at an early stage of the product development process since we value their feedback on how we can tailor our product and service offering to their needs. In addition, we solicit targeted opinions from our customers about how satisfied they are with our services and offer them the opportunity to raise questions or complaints via various channels, which we use as an opportunity to review and optimise our products and processes.

The policies, actions and objectives we apply to help us incorporate the interests and views of our customers are described in the disclosure requirements and entity-specific disclosures from S4-1 onwards.

[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Commerzbank's materiality assessment has identified key impacts, risks and opportunities that are of crucial importance to our business model and activities. These not only affect our own business operations, but also extend in particular to our banking business in the downstream value chain. A detailed overview of all identified material impacts, risks and opportunities in the individual environmental, social and governance dimensions can be found in the table at the end of this standard.

The main risks and opportunities for the Commerzbank Group arise primarily in connection with the issues of climate change and biodiversity loss, regulatory compliance, and customer management.

Our material environmental impacts focus on our financing activities, which can have both positive and negative effects on climate change, climate change mitigation, and biodiversity and ecosystems.

Our material impacts in the social dimension are evident on the one hand in relation to our employees, and on the other in relation to our customers.

Our material impacts on our workforce extend to several key aspects of our own business operations that are critical to the long-term satisfaction and well-being of our employees. These include social dialogue and adequate wages, work-life balance, health and safety with a focus on mental health, gender equality and the inclusion of people with disabilities, training and skills development, actions against violence and harassment, diversity, and data protection. These topics have a significant influence on the quality of the working environment and the attractiveness of the Commerzbank Group as an employer, and can have a positive or negative impact on our employees.

Commerzbank's material impacts on consumers and end-users are concentrated on the downstream value chain and concern the topics of customer satisfaction, customer service and proximity, protection against over-indebtedness, access to banking products for people with mobility problems, quality and complaint management, product responsibility and data protection with regard to customer data. These areas play a crucial role in terms of quality of service, accessibility and security of the banking services we provide and have a considerable influence on the relationship with our customers.

Strong governance is critical for banks as it lays the foundation for regulatory compliance, ethical conduct, and trust on the part of customers and investors. Based on our materiality

assessment, we have identified material impacts on key governance issues such as corporate culture and leadership, protection of whistleblowers, prevention of corruption and bribery, anti-money laundering and counter-terrorism, as well as tax transparency. Careful governance practices in these areas uphold the integrity of the Commerzbank Group and create a reliable basis for long-term stability and credibility. The material impacts relate mainly to Commerzbank and its employees, but also have knock-on effects on the Commerzbank Group's surrounding environment.

Influence of material impacts, risks and opportunities

The material impacts, risks and opportunities were determined for the first time as part of the materiality assessment for the Group Sustainability Report for the 2024 reporting year. The insights gained serve as a basis for ongoing monitoring and evaluation of the impact on our business model and strategy as well as decision-making within the Commerzbank Group. Should adjustments need to be made to the strategy or business model in the course of further monitoring, the Group will implement targeted strategic or operational changes to respond to shifting influences and take appropriate action to address the challenges and opportunities identified.

Given the relevance of Commerzbank and with a view to upholding our corporate responsibility, we defined sustainability as one of the key pillars of our strategy back in 2021. The new insights gained in connection with the identified impacts, risks and opportunities will be incorporated to support our current ambitions in the area of sustainability and align both our strategies and actions more precisely.

Impacts on people or the environment

The materiality assessment identified material positive and negative impacts in relation to all dimensions of sustainability: environmental, social and governance. A large portion of these impacts are concentrated on the social dimension and pertain to Commerzbank's own workforce or customers.

Link to strategy and business model

Our material environmental, social and governance impacts are largely determined by Commerzbank's strategy and business model or are inextricably linked to the same. The Group's financing decisions have a direct impact on environmental and social factors. For example, the Commerzbank Group can contribute to efforts to mitigate climate change and protect biodiversity through the targeted financing of climate-friendly projects, sustainable investments and undertakings; on the other hand, financing projects and companies that have a high carbon intensity

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or are harmful to biodiversity can have negative environmental impacts. In addition, Commerzbank's strategic measures in the social and societal actions, such as fostering a positive working environment (for example through adequate wages or flexible working time models) and supporting social dialogue, have a direct impact on employees and the working atmosphere.

Expected time horizons

In accordance with regulatory requirements, material impacts were assessed with a view to short-, medium- and long-term time horizons. The evaluation conducted by the responsible experts as part of the materiality assessment revealed that a large portion of the material impacts are of a medium- or long-term nature. This is due to the nature of the sustainability issues under consideration, whose impacts do not materialise immediately but only gradually over a longer period of time. Aspects such as adapting to regulatory requirements or establishing a sustainable corporate culture often only yield their full effect after several years. Risks and opportunities related to climate change mitigation actions or promoting diversity and inclusion also require more time – in terms of both implementation and effectiveness – before they are anchored sustainably in the corporate model.

Link to specific activities or business relationships

Commerzbank bears a significant share of the identified environmental and social impacts through its own business activities, in particular through its financing activities. Depending on how it channels its capital, it influences the promotion of sustainable projects and climate change mitigation – either positively or negatively. Furthermore, Commerzbank influences the social circumstances of its own employees through its business activities. The internal impacts resulting from the company's day-to-day operations encompass aspects such as adequate wages, occupational safety, actions to promote mental health, social dialogue, and compliance with the principles of diversity and equality.

Resilience of the strategy and business model

Identified impacts, risks and opportunities are assessed and monitored on a continuous basis to ensure that we can respond flexibly to new developments and remain resilient in the long term. In the thematic disclosures that follow in this report, we describe how Commerzbank has defined its impacts, risks and opportunities and disclose how these are integrated into its strategy and business model. For example, we assessed potential risks from climate change. These are regularly evaluated as part of scenario analyses and integrated into strategic planning. Since this materiality assessment is the first time such material impacts, risks and opportunities were identified and recorded, Commerzbank will gradually expand its approach to evaluating its resilience in dealing with these factors going forward.

The findings of the materiality assessment and the impacts, risks and opportunities identified in this context are gradually being incorporated into our strategy processes. The current financial impacts of material risks and opportunities have not yet been systematically quantified as a separate disclosure. An initial review did not reveal any significant impacts from material risks and opportunities on Commerzbank's financial position, earnings or cash flows in 2024. The current and expected future impact of climate and biodiversity risks on Commerzbank's material risk types, including their classification in terms of the materiality threshold as a potential impact of 0.75% of the total economically required capital, is set out in more detail in ESRS E1 SBM-3 and E4 SBM-3.

Changes since the prior reporting period

Given that this is the first-time collection and disclosure of material impacts, risks and opportunities, there are no changes compared to a prior reporting period.

ESRS-related impacts, risks and opportunities

The following table contains all ESRS-related impacts, risks and opportunities that were identified as material during Commerzbank's double materiality assessment.

Key impacts, risks and opportunities (IRO table)

Topic	Perspective ¹	IRO type	IRO text	Actual/ potential
Environment				
Climate change adaptation	Banking business	Positive impact	The Commerzbank Group can have a positive impact on climate change adaptation through its financing activities.	Actual
		Risk	Inadequate action to adapt to climate-related physical risks (e.g. floods, heatwaves or rising water levels) can have consequences in terms of well-known risk types such as credit risk or market risk.	Potential
Climate change mitigation	Banking business	Positive impact	The Commerzbank Group can help to mitigate climate change by financing climate-friendly solutions and directing financial flows into sustainable investments.	Potential
		Negative impact	The Commerzbank Group can have a negative impact on climate change by financing carbon-intensive or energy-intensive companies.	Actual
		Risk	Transition risks from insufficient efforts to mitigate climate change can materialise in existing risk types (here, focus on credit risk and market risk).	Potential
		Risk	Since P&L is dependent on sectors still in need transformation, future earnings may be lost if this transformation is unsuccessful.	Potential
		Opportunity	The Commerzbank Group can increase its the volume of its financing through the growing need for investments in climate change mitigation actions.	Actual
	Operations	Positive impact	The Commerzbank Group can set a benchmark and positively influence its peers through its publicly communicated climate change mitigation targets.	Potential
Biodiversity and ecosystems	Banking business	Positive impact	The Commerzbank Group can contribute to the promotion and preservation of important ecosystems by financing nature-oriented and environmentally friendly companies and projects.	Actual
		Negative impact	The Commerzbank Group can contribute to the harming and loss of important ecosystems by financing companies and projects.	Actual
		Risk	The Commerzbank Group may face a higher credit default risk because the financed economic activities are dependent on ecosystem services that are in decline. Additionally, loans may be affected by acute natural disasters that are exacerbated or triggered by biodiversity loss. The ensuing risks, including credit risk, may in turn lead to increased business risks.	Potential
		Risk	Investing in projects or lending to companies that harm biodiversity can engender reputational risks, credit default risks and business risks, as economic processes that harm biodiversity are increasingly subject to regulatory requirements and meet with resistance from society.	Potential
Social				
Social dialogue and freedom of association	Operations	Positive impact	The Commerzbank Group can foster social dialogue through its collaborative approach with social partners.	Actual
		Negative impact	If Commerzbank Group employees have only limited opportunities for social dialogue with their employer, this can have negative impacts on employees.	Potential
Collective bargaining and adequate wages	Operations	Positive impact	As an employer, the Commerzbank Group has an influence on adequate wages for its employees.	Actual
		Negative impact	Drops in real wages due to inadequate adjustments to salaries in times of global crises and inflation can cause Commerzbank employees to underperform.	Potential

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Key impacts, risks and opportunities (IRO table)

Topic	Perspective ¹	IRO type	IRO text	Actual/ potential
Work-life balance and working time	Operations	Positive impact	By implementing flexible working time models or parental leave / caregiver leave, the Commerzbank Group can have a positive impact on the professional and private lives of its employees.	Actual
		Negative impact	If it fails to offer sufficient opportunities to create an appropriate work-life balance, the Commerzbank Group can have a negative impact on the professional and private lives of its employees and appear less attractive to potential applicants.	Potential
Health and safety	Operations	Positive impact	Through corporate health management initiatives, employers can have a positive impact on the mental health of their employees. These initiatives should be tailored to the target group and the prevailing work situation. Individual solutions and advice offer a productive approach.	Actual
Gender equality and equal pay for work of equal value (gender pay gap)	Operations	Positive impact	Transparent and uniform remuneration systems for all employees promote gender equality and minimise the likelihood of unequal pay on grounds of gender.	Actual
		Negative impact	If salary structures are unclear and no collective agreements are in place, this can have a negative impact on gender equality in terms of pay. If genders are not treated equally when implementing salary structures, this can have an adverse effect on the gender pay gap.	Potential
Training and skills development	Operations	Positive impact	The Commerzbank Group promotes the (upskilling) training of its employees through educational and training programmes.	Actual
		Negative impact	Learning opportunities must be up to date and able to respond to new trends. Otherwise, the desired effect may not be achieved and the employees may not be sufficiently qualified for their work.	Potential
Employment and inclusion of persons with disabilities	Operations	Positive impact	Through its non-discriminatory treatment of all people, the Commerzbank Group can employ people with disabilities without restrictions.	Actual
		Negative impact	Through discriminatory treatment, Commerzbank may contribute to the social disadvantages faced by people with disabilities.	Potential
Measures against violence and harassment in the workplace	Operations	Positive impact	Measures against violence and harassment in the workplace can help to create a safe working environment within the Commerzbank Group.	Actual
		Negative impact	Insufficient measures against violence and harassment in the workplace can contribute to an unsafe working environment within the Commerzbank Group. It is important to raise awareness among employees by creating transparency and ensuring good communication.	Potential
Diversity	Operations	Positive impact	The Commerzbank Group can promote diversity among its workforce by means of targeted actions such as introducing a global diversity standard.	Actual
		Negative impact	Failure to adequately promote diversity in the workforce can have a negative impact on the Commerzbank Group's employees in terms of their development opportunities and satisfaction.	Potential
Data protection ²	Operations	Positive impact	The Commerzbank Group can protect confidential employee data from unauthorised access through a heightened awareness of the issue and by implementing stringent security measures.	Potential
		Positive impact	Regular training and measures to raise awareness of data protection issues can assist with identifying security threats and implementing appropriate protective measures, and can improve the competency of Commerzbank Group employees.	Potential
	Banking business	Positive impact	The Commerzbank Group can ensure a high level of data protection.	Potential
Customer satisfaction ²	Banking business	Negative impact	Poor customer service and deficient customer advice can lead to declining satisfaction among customers of the Commerzbank Group.	Potential
		Risk	Declining customer satisfaction can lead to lower sales and the loss of customers in the banking business of the Commerzbank Group.	Potential
Customer service and customer proximity ²	Banking business	Positive impact	If consumers and end-users of the Commerzbank Group have a variety of options at their disposal to contact the Bank (in person, by e-mail or telephone, or using chatbots) as well as easy access to banking products and the banking infrastructure, this can add value to their overall experience.	Actual
Protection against over-indebtedness ²	Banking business	Positive impact	Through professional advisory services, control mechanisms and training for employees that have direct contact to customers, the Commerzbank Group can protect consumers and end users from over-indebtedness.	Actual

Key impacts, risks and opportunities (IRO table)

Topic	Perspective ¹	IRO type	IRO text	Actual/ potential
		Opportunity	The Commerzbank Group can protect consumers and end-users from over-indebtedness and thus prevent loan defaults by conducting a detailed evaluation of their financial circumstances and providing professional advisory services.	Actual
Access to banking products for people with mobility problems ²	Banking business	Positive impact	By offering digital accessibility, Commerzbank AG can also make it easier for people with mobility problems to access digital banking products.	Actual
			By creating barrier-free access to banking products in branches, the Commerzbank Group can also provide easier access to banking products for people with physical disabilities.	Actual
		Positive impact	By creating barrier-free access to digital offerings for private customers, Commerzbank AG can also offer access to digital banking products to people with mobility problems.	Actual
Quality and complaints management	Banking business	Positive impact	The Commerzbank Group can provide easy access to complaints management through low-threshold offerings, meaning it can effectively identify and address customers' interests.	Actual
Product responsibility ²	Banking business	Positive impact	By assuming responsibility in relation to its own banking products, the Commerzbank Group can protect consumers and end-users from negative impacts, such as financial losses.	Actual
Governance				
Corporate culture and corporate management		Positive impact	The Commerzbank Group can contribute to a positive corporate culture by establishing a code of conduct.	Potential
		Negative impact	A code of conduct must be lived in practice and backed up by measures. Otherwise, it is difficult to exemplify a culture of trust.	Potential
Whistleblower protection		Positive impact	Offering comprehensive whistleblower protection signals that the Commerzbank Group supports ethical conduct and transparency, meaning that employees feel safer reporting potential issues without any fear of disciplinary consequences. This fosters a stronger corporate culture and long-term stability by encouraging the exposure of wrongdoing and misconduct.	Actual
Corruption and bribery		Positive impact	The Commerzbank Group can counteract corruption and bribery by providing comprehensive training to employees and issuing far-reaching directives.	Actual
		Negative impact	Inadequate measures to combat corruption and bribery can weaken institutional structures and promote general public distrust of banks and other financial institutions.	Potential
		Risk	Failure to comply with legal and regulatory requirements relating to corruption and bribery or incidents and scandals caused by corruption and bribery may result in direct financial losses for the Commerzbank Group in the form of fines, legal defence costs and claims for damages.	Potential
Prevention of money laundering and terrorist financing ²		Positive impact	The Commerzbank Group can combat and nearly completely prevent money laundering and terrorist financing by providing comprehensive training to employees and issuing far-reaching directives.	Actual
		Negative impact	Lack of training and directives can have a negative impact on the prevention of money laundering and terrorist financing.	Potential
		Risk	Failure to comply with AML and terrorist financing regulations may result in financial penalties and regulatory sanctions as well as reputational damage for Commerzbank.	Potential
Tax transparency ²		Positive impact	Promoting tax transparency is perceived as ethical and responsible, which strengthens trust in the Commerzbank Group on the part of customers, investors and the general public.	Actual
		Negative impact	A lack of tax transparency can undermine public confidence in the Commerzbank Group.	Potential

¹ The topic of governance is not broken down into two logical categories: banking business and operations.² The topics result in entity-specific disclosures.

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[E1 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Climate risks are included in the business and sustainability strategy on a regular basis. As part of its annual strategy process, Commerzbank analyses various key indicators and environmental factors that are relevant to the Bank's strategy and business model. This analysis of impact drivers includes both internal perspectives (including employees) and external perspectives (including customers and investors). The results and conclusions from the holistic analysis are used within the subsequent strategy process to help develop the strategy and business model. Climate risks form part of this analysis. Strategic key performance indicators (KPIs) related to sustainability and an increasing focus on financing the customer transformation are additional factors that strengthen our resilience to climate risks. By regularly assessing and incorporating sustainability risks and goals into strategic planning, Commerzbank is currently well positioned to adapt to the effects of climate change.

Commerzbank also conducts an annual materiality assessment for climate risks, including their impact on business risks. The results of this analysis are used to help develop the business strategy, the overall risk strategy and the various sub-risk strategies. In addition, the results are incorporated into other core elements of the Internal Capital Adequacy Assessment Process (ICAAP) to ensure an adequate capital allocation, for example the internal stress testing framework and risk-bearing capacity. Risk types that are particularly affected by climate risks are managed within the respective risk type. For further information, please refer to the section "Management by the affected risk types". Commerzbank also analyses its resilience to more extreme scenarios as part of annual internal climate risk stress test. In the reporting year 2024, a climate risk stress test was performed with a focus on short- and medium-term transition risks due to disruptive, regulatory driven adjustments to achieve the Net-Zero target by 2050. A climate risk stress test was also conducted in 2023 with a focus on long-term physical risks; given the stability of the portfolio structure compared to the long time horizon used for the analysis, the findings from the test remained applicable in 2024. The underlying scenario narrative assumed a global socio-economic disruption as a result of major physical climate events. Both stress tests showed controllable

impacts on Commerzbank's risk profile, with Commerzbank's risk-bearing capacity remaining above the regulatory minimum requirements (100% risk-bearing capacity and > 6.5% CET1 ratio) at all times, even in the stress scenario. Since they are scenario-based assessments, the annual materiality assessment and the internal climate risk stress test are also subject to limitations. It is not certain that any of the selected scenarios will occur and also possible that scenarios that have not been analysed will occur. This limitation is mitigated by selecting the scenarios most relevant for Commerzbank based on expert assessments. In addition, since climate risks are an industry-wide learning area, continuous developments (with regard to data or methodology, for example) are conducted.

As part of the materiality assessment mentioned above, Commerzbank does not define climate risks as a separate risk type, but rather as a horizontal risk driver, which can materialise across the different known types of risk such as credit risk or market risk. In 2024, a comprehensive materiality assessment was carried out again for climate risks across all risk types for Commerzbank as part of the annual risk inventory process, taking into account among others the requirements of the European Central Bank's Guide on climate-related and environmental risks. As part of this process, all risk types generally assessed as material in the risk inventory (credit risk, market risk, operational risk, compliance risk, cyber risk, physical asset risk, business risk, reputational risk, liquidity risk, model risk) within the subsidiaries generally considered as material in the context of the risk inventory were evaluated in terms of the materiality of their exposure to climate risks.

Both transition and physical risks were considered and a materiality assessment conducted for each of them. This classification into materially affected and non-materially affected risk types was based on both a time dimension and a risk type-specific dimension. The time dimension is divided into short-, medium- and long-term time horizons. The short-term time horizon is up to one year, the medium-term time horizon one to five years, and the long-term time horizon more than five years (at least ten years were considered). For each specified time horizon, an assessment is carried out to determine the materiality of climate risks, which can be further divided into physical and transition risks. The determination of materiality per risk category is scenario-based and, where possible, based on a quantitative basis. The threshold for assessing the materiality of climate risks is a potential financial impact of 0.75% of Commerzbank's total economically required capital (ErC). If this ErC impact exceeds the threshold of 0.75%, we consider the risk type to be significantly impacted by climate risks.

Based on this, a holistic consideration of the effects on risk types materially affected by climate risks is ensured as part of Commerzbank's ICAAP. This is done, for example, by using a capital buffer linked to environmental risks, through replication in existing economic capital models, or by means of a management buffer. Wherever materially and methodically feasible, the impact of climate risks is already taken into account in risk and capital management, for example via risk provisions. Commerzbank booked collective staging for climate risks to its risk provisions in 2024. This is updated on a continuous basis and thus reflected in the Bank's balance sheet. The materiality of climate risks is reviewed annually using regular scenario analyses, and the level of integration into capital management then adjusted accordingly. This helps ensure Commerzbank's resilience: potential capital effects are taken into account as part of risk-bearing capacity, safeguarding Commerzbank's risk-bearing capacity overall.

The materiality assessment process first involves carrying out a comprehensive qualitative analysis of possible transmission channels, which is generally supplemented with a scenario-based quantification. The climate scenarios used include those by the Network for Greening the Financial System (NGFS). The NGFS Net-Zero 2050 Scenario, for example, assumes that net carbon emissions will reach zero by 2050, providing at least a 50% chance of limiting global warming to below 1.5 °C by the end of the century. The physical risks are therefore relatively low, but the transition risks are elevated due to the transformation required. The NGFS Current Policies scenario, on the other hand, assumes that no new climate regulations are implemented and consequently emissions will increase until 2080, leading to warming of about 3 °C and significant physical risks. We additionally apply the NGFS Fragmented World scenario, which assumes that some countries continue to generate high emissions while other countries undergo a transition. This scenario allows high physical and transition risks to be considered together. The internally established scenario analysis and stress testing infrastructure is used to calculate the potential impacts in the scenarios mentioned. Necessary parameters (e.g. volatilities) that are not provided directly by the relevant scenario creators (such as NGFS) are derived by Commerzbank itself in line with the scenario.

Transition climate 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 climate risks, meanwhile, 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 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 physical asset risk, liquidity risk and model risk. A risk type is considered to be materially influenced by climate risks as soon as it is materially affected by either climate-related transition risks or climate-related physical risks in one of the three specified time horizons. An overview of the results can be found in the following table. The steering is conducted by the respective affected risk type. With regard to its material subsidiaries, Commerzbank sets minimum standards for these as part of its global functional lead role.

Climate risk materiality assessment¹

Material risk types	Physical risks			Transition risks		
	Short term	Medium term	Long term	Short term	Medium term	Long term
Credit risk (including counterparty risk)	No	No	Yes	No	No	Yes
Market risk	No	No	No	No	No	Yes
Operational risk (including compliance and cyber risk)	No	No	No	Yes	Yes	Yes
Reputational risk	No	No	No	Yes	Yes	Yes
Physical asset risk	No	No	No	No	No	No
Business risk	No	No	No	Yes	Yes	Yes
Liquidity risk	No	No	No	No	No	No
Model risk	No	No	No	No	No	No

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

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Management by the affected risk types

Credit risk

In order to manage the effects of climate risks in Commerzbank AG's lending business, we systematically optimise our processes and methods. Especially in connection to our strategy to support the transformation of companies to a more environmentally friendly and climate-neutral economy, we must understand and actively manage the associated risks. In this context, we are combining the findings from the scenario analyses with the individual risk analysis at customer level. We take a portfolio-specific approach, meaning we take appropriate account of the differences in terms of affectedness and the risk drivers. In the portfolios that are particularly relevant in terms of their exposure to climate risks – corporate customers, special financing, banks and commercial real estate financing – the results of the scenario and credit risk analyses are aggregated in a structured assessment to produce a climate risk score. We factor this score into the individual loan decision. Elevated portfolio-specific requirements are triggered depending on the final score, such as conditions stipulating more a detailed assessment of climate risk, or restrictions such as limiting the credit terms. We also use this score as part of our portfolio analysis and management. Portfolio-specific guidelines, which are anchored in the credit risk strategy, limit the share of the portfolio with heightened climate risk. These processes and procedures are fully integrated into the credit risk analysis; as mandatory components, they are anchored in the corresponding procedural instructions. In our target state, we want to integrate climate risks – as far as possible – into the quantitative credit risk analysis and thus fully reflect them across the process chain, including when setting terms and conditions and in reporting. Another key aspect is adding continuously to our specialists' expertise in climate risk, which enables us to discuss the challenges and work together with our customers to assess the risks at eye level. With the support of external advisors, the scientific community and auxiliary initiatives, we are deepening this know-how using a variety of channels, for example sector profiles which analyse the specific impact chains of climate risks for the most severely affected sectors. By combining these measures, we ensure that we are taking appropriate account of the associated risks in our efforts to support the transformation.

Market risk

Market risk in relation to climate change risk was assessed on a portfolio basis and in particular from an economic perspective. Overall, Commerzbank is subject to market risks in sectors that are potentially affected by climate risks and that are sensitive in particular to credit spreads and share prices in affected sectors, as well as to interest rates; all of these risks are likely to increase depending on the adaptability of companies and of the world's economies. We can infer from the scenario-based volatilities specific to the climate scenario that transition climate risk is a material driver of market risk in the long term. The capital buffer already established for this purpose and determined in accordance with the Internal Capital Adequacy Assessment Process (ICAAP capital buffer) will be retained. For physical climate risk, no material effects were derived from the scenario calculation. The positions particularly affected by climate risks are subject to regular monitoring. An early warning indicator has been set up for monitoring purposes to ensure that climate risks do not exceed the established ICAAP capital buffer in terms of their materiality during a given year. This is done by referencing scenario-driven shifts (e.g. credit spread shifts) to the current changing portfolio. The way in which climate risks are factored into the New Product Process (NPP) was further improved by including ESG-relevant criteria as potential parameters governing pre-approval of new business. In addition, market risk-specific reporting has been part of the Bank's core risk report since 2023.

Operational risk

Operational risk has also been classified with regard to climate risks in the defined time horizons. Specific scenario analyses were used to quantify possible effects. The applied analysis method covered issues including natural disasters, supplier or service provider failure, vandalism and terrorism, and greenwashing. Quantitative effects were evaluated using bank-specific and risk-type-specific scenarios, including expert estimates. As a result, transition climate risks were classified as material in all three time horizons. The hypothetical greenwashing scenario in particular is a key driver of this materiality classification. Corresponding scenarios are factored into the specific modelling for operational risks and are subject to an annual assessment and update. A risk indicator that reflects climate-related losses in operational risk was established in 2023.

Reputational risk

According to the risk inventory, reputational risk – also assessed as material in terms of climate risks – is one of the main non-quantifiable risk types in the Commerzbank Group and is therefore managed as part of the overall risk strategy. Commerzbank AG's Reputational Risk Management department defines prerequisites and limits for business activities and assesses transactions, products and customer relationships after careful analysis. The assessment process starts on the market side. 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. All sensitive topics and the corresponding positions and guidelines are reviewed regularly and updated as necessary. A transparent overview of the assessment process and the criteria used is provided within Commerzbank AG's ESG framework. During the environmental risk materiality assessment, reputational risks were classified as material overall due to the materiality of transition climate risks, particularly with regard to greenwashing risk in the short-, medium- and long-term time horizons. Quantitative effects were evaluated using bank-specific and risk-type-specific scenarios, including expert estimates. Reputational risk in the context of environmental risk is considered part of regular risk reporting to senior management (including the Board of Managing Directors).

In view of the relevance of greenwashing risks for both operational and reputational risk, a wide range of control measures have been established including setting up greenwashing controls and conducting reviews of new sustainable products also within the context of the New Product Process. In addition, an internal greenwashing risk guideline was developed to provide a framework for managing greenwashing risks, thus anchoring the topic in the Bank's written framework.

Business risk

Given the particular importance of sustainability matters, including climate risks, for the overarching business strategy, coupled with the potentially higher deviations in income between sectors that are especially impacted by transition climate risks, climate risk is deemed a material risk driver for business risk over the short-, medium- and long-term time horizons. This involves analysing the extent to which total income (interest and commissions) is dependent on sectors deemed critical from a climate risk perspective, and using scenarios to identify possible declines in income from these sectors. In addition, business risk may potentially be affected by secondary effects from reputational risk. Potential exposure to climate risks, including potential effects from reputational risk, has been included in the business risk management buffer by means of a climate risk buffer, which is subject to regular adequacy reviews.

[E4 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Commerzbank considers the impacts, risks and opportunities related to biodiversity and the ecosystem services, both for the financed loan portfolio as well as for its own banking operations. The processes and analyses required for this purpose and their impacts on the Bank's strategy are described below.

The dependencies or physical risks as well as the transition risks are analysed within the environmental risk materiality assessment as part of the annual risk inventory. The analysis includes an assessment of transmission channels and risk drivers through which biodiversity risks could potentially affect the Bank's material risk types.³

³ The following risk types were defined as material for the Commerzbank Group within the overall risk strategy based on the risk inventory: credit risk, market risk, operational risk,

compliance risk, cyber risk, physical asset risk, business risk, reputation risk, liquidity risk, model risk.

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Annual materiality assessment for biodiversity risks

As part of the annual risk inventory process, Commerzbank conducts a comprehensive, risk-type overarching materiality assessment for biodiversity risks. The results of this analysis are used to help develop the business strategy, the overall risk strategy and the various sub-risk strategies. In addition, the results are incorporated into other core elements of the ICAAP to ensure an adequate capital position, for example the risk-bearing capacity. Risk types that are particularly affected by biodiversity risks are managed within the respective risk type.

As part of the materiality assessment mentioned above, Commerzbank views biodiversity risks as a horizontal risk driver. These can materialise across the different known types of risk such as credit risk or market risk. Within the context of the assessment performed in the 2024 reporting year, all risk types assessed as material in the risk inventory within the Group companies generally considered as material in the risk inventory were evaluated in terms of the materiality-to biodiversity risks.⁴ Both transition and physical risks were considered and a materiality assessment was carried out in each case.

Physical biodiversity risks can arise from the loss or deterioration of ecosystem services which are vital for economic activities, such as deteriorating water availability or soil quality. Physical risks can also arise as a result of natural disasters that are triggered or exacerbated by biodiversity loss.⁵ Transition risks, on the other hand, arise as a result of the transformation process towards a more sustainable and environmentally friendly economy. Risk triggers include regulatory changes and allegations of greenwashing.⁶

The classification into materially affected and non-materially-affected risk types was based on both a time dimension and a risk type-specific dimension. The time dimension is divided into short-, medium- and long-term time horizons. The short-term time horizon is up to one year, the medium-term time horizon one to five years, and the long-term time horizon more than five years (at least ten years were considered). For each specified time horizon, an assessment is first carried out to determine the materiality of 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 materiality thresholds from the risk inventory for all risk types. The evaluation of materiality for each risk type is determined on a scenario basis. This provides the foundation for ensuring holistic consideration of the effects resulting from the risk types materially affected by biodiversity risks as part of Commerzbank's ICAAP.

Following the initial assessment in 2022, the scope of the analysis was expanded and the methodology improved in the year under review. The expert-based materiality assessment of the exposure to biodiversity risks includes a driver and transmission channel analysis. In addition, a portfolio analysis was carried out for the credit, market and business risk types, based on data from ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure, 2024 data version) and the World Wide Fund For Nature Biodiversity Risk Filter (hereinafter "WWF BRF"). In the status quo, the analysis only uses data considering the direct impacts and dependencies of the sectors in which our customers operate, but not their respective supply chains. In addition to the status quo portfolio analysis, further analyses were carried out to gain a deeper understanding of the extent to which Commerzbank is affected by biodiversity risks. Due to the lack of market standards, scarce availability of data, high level of complexity and multitude of risk drivers, various complementary analyses were additionally carried out. These included a qualitative scenario analysis based on the scenario narratives of the Task Force on Nature-Related Financial Disclosures (TNFD), a geo-specific risk analysis of relevant customers and, for the first time, a quantitative scenario analysis of water risks in the energy sector. The results of the analyses form the basis for an overarching assessment of the materiality of biodiversity risks for the Bank's risk types in the in the short-, medium- and long-term time horizons. The procedure for each analysis is described in more detail below.

For the reporting year the assessment shows that credit risk, reputational risk and business risk are materially affected by biodiversity risks. The risk types are particularly affected in the medium- and long-term, according to the Bank's assessment. Commerzbank considers market risk, operational risk, physical asset risk, liquidity risk and model risk to be non-material (see table).

⁴ The materiality threshold for assessing the materiality of biodiversity risks is a potential financial impact of 0.75% of the total economically required capital (ErC).

⁵ All 25 ENCORE ecosystem services were assessed in the analysis.

⁶ 12 of 13 ENCORE impact drivers were assessed in the analysis, excluding "GHG emissions" to avoid double assessment with climate risk.

Biodiversity risk materiality assessment¹

Material risk types	Physical risks			Transition risks		
	Short term	Medium term	Long term	Short term	Medium term	Long term
Credit risk (including counterparty risk)	No	No	Yes	No	No	Yes
Market risk	No	No	No	No	No	No
Operational risk (including compliance and cyber risk)	No	No	No	No	No	No
Reputational risk	No	No	No	No	Yes	Yes
Physical asset risk	No	No	No	No	No	No
Business risk	No	No	No	No	Yes	Yes
Liquidity risk	No	No	No	No	No	No
Model risk	No	No	No	No	No	No

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

For credit risk, biodiversity risks – like climate-related risks – are material in the long term for both physical and transition risks. The assessment is based on the assumption that physical and transition risks will increase in future and that these risks will affect Commerzbank via various transmission channels. Water risks were identified as particularly relevant.

Reputational risks were classified as material overall due to the materiality of biodiversity transition risks in the medium- and long-term. In addition, greenwashing allegations are especially relevant for this type of risk. These can also be triggered by market changes, for example by a societal shift towards more environmentally conscious behaviour. Reputational Risk Management assessed the corresponding quantitative impacts using risk driver-specific scenarios, taking into account expert estimates.

Biodiversity transition risks were also classified as material for business risk. The decisive factor here is the assessment of materiality for the medium- and long-term time horizon. Overall, the relevance of transitional risk drivers and transmission channels arises from secondary effects caused by reputational and credit risks, but especially from potentially higher P&L deviations in sectors relevant for transition risk.

Portfolio analysis

As already outlined above, portfolio analyses were carried out in the reporting year for credit, market and business risk, based on data from ENCORE and the WWF BRF.

ENCORE primarily considers theoretical impact chains between economic activities and nature, particularly with regard to biodiversity and ecosystems. It helps companies and financial institutions understand the dependencies and impacts of their activities on natural capital. ENCORE shows how economic sectors depend on ecosystem services, and how they could potentially influence them. The tool assesses sector dependencies and impacts using the following scale: no data, no correlation, very low, low, medium, high and very high. Although ENCORE assesses economic risks, it does not provide a direct quantitative economic assessment for financial institutions. For the portfolio analysis, the data from ENCORE are used to assess the loan portfolio at sector level.

The WWF BRF assesses geo-specific risks, meaning it complements the ENCORE data. In the reporting year, the WWF BRF was mainly used to analyse the commercial banking portfolio, as it defines country scores that take into account both the country's biodiversity risk profile and the country's average sector composition. The WWF BRF assesses sector dependencies and impacts using the following scale: very low, low, medium, high and very high.

The two data sources form the basis for the portfolio analysis and biodiversity metric, which classifies the portfolio into "high", "medium" and "low" risk ratings for physical and biodiversity transition risks.

Qualitative scenario analysis and materiality assessment of risk types

The portfolio analysis was used to assess the financial impacts of biodiversity risks over different time horizons for each of the Bank's material risk types, applying the selection of relevant transmission channels per risk type as a base. This was followed by a qualitative scenario analysis based on two narratives of the Task Force on Nature-related Financial Disclosure (TNFD). The two narratives "Ahead of the Game" and "Sand in the Gears" were selected due to their respective focus on physical and transition risks. The analysis involved assessing how the transmission channels of the Bank's risk types develop in the narratives and whether this potentially leads to materiality for the risk type in different time horizons.

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WWF BRF – site-specific analysis

Physical biodiversity risks in particular are highly location sensitive. Data on customers' financially relevant locations therefore form an important part of the risk analysis. Due to the limited availability of location data from customers (regarding production sites, for example), the analysis carried out in the reporting year was based on a selection of financially relevant customers that operate in sectors subject to heightened biodiversity risk. The data was used to perform a coordinate-based analysis taking into account site-specific physical and biodiversity transition risks.

Overall, the analysis showed that the majority of companies initially have a medium or high biodiversity risk. However, large multinational companies in particular exhibit a high degree of location and sector diversification, which helps to mitigate the risk. It was also noted that the results largely align with the ENCORE sector assessments.

Water risk analysis in the energy sector

A quantitative scenario analysis will not be performed for the overall portfolio at this time due to a lack of data and models. In an effort to approximate the target picture, however, the risk driver (water) and the sector (energy) with the highest relevance for Commerzbank's portfolio were selected for a quantitative scenario analysis. Overall, the scenario analysis revealed only minor EBITDA-changes. The analysis made it possible to identify the most important energy producers and locations and to gain insights to further enhance the analyses.

Impact assessment

As part of the annual materiality assessment of biodiversity risks and with a particular view to identifying transition risks, an analysis is also performed for the potential impacts on biodiversity and ecosystem services. This involves comparing the contribution made by each sector to the direct impact drivers of pollution (including water, soil, light, noise, waste), resource use (including fresh water, seabed,

fish, wood), land use, and introduction of invasive species with the current loan portfolio of Commerzbank AG. The results show which sectors in Commerzbank's portfolio have high impacts and which impact drivers are especially affected. Commerzbank uses the results of the impact assessment to identify potential areas of action and strategic priorities and to develop measures and products to protect biodiversity.

As part of Commerzbank AG's impact assessment, a total of 42% of the portfolio was determined to have high impacts, 24% to have medium impacts and 34% to have low impacts, according to the internal classification (more details can be found in the section dedicated to ESRS E4-6). This shows that Commerzbank AG, as a major financial player in the German economy, is also active in sectors that have a negative impact on biodiversity. Compared to its overall portfolio, however, Commerzbank AG has only a small exposure in some of the most severely affected sectors such as agriculture, forestry and mining. Sectors with higher impacts on biodiversity that have a sufficiently large exposure include construction and manufacturing industry. Soil and water pollution as well as noise and light pollution have been identified as key drivers of biodiversity impacts across our portfolio.

Biodiversity in own banking operations

Commerzbank AG used the WWF Biodiversity Risk Filter to perform an analysis of the dependencies and impacts of its own locations on biodiversity and ecosystems. The analysis revealed that Commerzbank AG does not conduct any activities in its direct operating business that have material negative impacts or dependencies on biodiversity, ecosystems, biodiversity sensitive areas or protected species. Nevertheless, the topic of biodiversity is an integral part of Commerzbank AG's environmental guidelines for its banking operations. In these environmental guidelines, we commit to taking action to promote biodiversity wherever possible and avoiding direct negative impacts. Therefore, we do not implement any explicit biodiversity offsetting measures.

[S1 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Impact on own workforce

The actual and potential impacts on Commerzbank employees identified in the IRO analysis are related to the Bank's strategy and business model. Parallel to this, new impetus in the world of work and changes in society can influence the strategy and business model.

The impacts not only arise from the strategy and the business model but determine them, as well. This dynamic can be leveraged to promote positive impacts and avoid negative impacts. Corporate responsibility also means seeking regular dialogue with employees. Commerzbank pursues an active and transparent dialogue with a view to satisfying the expectations and needs of its employees and stakeholders, taking account of them in its corporate strategy and setting out its own perspective. See also the disclosure in ESRS S1-2, S1-3, S1-4 and S1-8.

Type of employees

The staff employed by Commerzbank have a direct employment relationship with the company. The workforce includes employees with both permanent and fixed-term employment contracts who work part-time or full-time for Commerzbank.

This group of people directly employed by Commerzbank is considered equally and as a whole in the impact assessment. The following reporting refers exclusively to this group of people. Possible exceptions are stated explicitly. The ESRS defines "at-risk or persons in vulnerable situations" as individuals who may be more severely affected by negative impacts; no such persons were identified. Non-employees are excluded from consideration based on the results of the materiality assessment.

Material positive impacts

Commerzbank exerts positive impacts on its employees in a variety of ways. Firstly, the Bank is required to comply with comprehensive national and legislation enacted to support and protect employees.

Collective bargaining and social dialogue ensure adequate wages and safeguard employees' rights.

In addition, the Bank has scope to positively influence the working and employment conditions of its employees, which we address through comprehensive strategies, actions and activities.

Commerzbank takes responsibility for its employees and actively fulfils its duty of care as an employer. This includes due diligence within the meaning of the German Corporate Due Diligence in Supply Chains Act (LkSG). Our mission with our human resources strategy is to have a positive influence on employee satisfaction and be perceived as an attractive employer on the internal and external labour market.

Therefore, our focus is on strengthening the identified positive impacts. These include:

- Collective bargaining and social dialogue as well as adequate wages
- Promoting diversity and inclusion in the workplace
- Discrimination-free and fair working environment
- Work-life balance and the promotion of women in management positions
- Comprehensive training and development offering for professional development and interest-based learning
- Promoting mental health
- Good corporate culture and leadership

See also the disclosure in ESRS S1-8 to S1-16.

Material negative impacts

The identified negative impacts of Commerzbank on its employees constitute potential negative impacts. These are counteracted by current strategies, policies, and preventive and remedial measures in the areas listed above with a view to strengthening the positive impacts.

The potential negative impacts on employees that arise through their employment at Commerzbank are widespread and well known in the world of work, and the banking industry is no exception. The potential negative impacts are not caused by specific circumstances at Commerzbank, but are common throughout the financial sector and the world of work. They are within the scope of the natural impacts of an employer-employee relationship.

In the case of potential negative impacts on employees, preventive actions are taken to prevent the negative impact from arising.

The type of action depends on the severity of the negative impacts and their consequences, as well as on Commerzbank's

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contribution to the cause of the impact. Action can be taken to compensate, mitigate or completely eliminate the negative impacts on employees. In particular, actions to remedy negative impacts within the meaning of the LkSG are aimed at immediate and complete elimination.

Transition plans to reduce negative impacts on the environment and achieve more environmentally friendly and climate-neutral activities, including Commerzbank's plans and measures to reduce carbon emissions, do not give rise to any significant impacts for Commerzbank employees within the meaning of the ESRS.

[S4 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

The main impacts, risks and opportunities arise from our business model, which places customers at the centre of our strategic and operational activities. Within the context of our value chain – which encompasses our brands and subsidiaries, our various customer channels and our extensive range of products and services – we understand that a sustainable customer relationship requires ongoing efforts to mitigate risks for the Bank and customers and to offer the best possible service and advice tailored to our customers' needs, supported by appropriate product solutions that are understandable and accessible for all.

To mitigate the potential risk of a decrease in customer satisfaction, emphasis is placed on engaging with our customers in order to incorporate user requirements into the (further) development of services and products, and take into account negative or positive impacts into future decisions. A dedicated unit 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 product development, customers are involved in the various stages on an event-driven basis.

Not only do customers and stakeholders have the opportunity to actively influence our offering; they can also obtain information or address questions and concerns via various channels. Customer satisfaction is a top priority for us. For this reason, we actively solicit feedback on the quality of our advisory services and products as well as on the customer experience in general.

The material impacts are divided into positive and negative impacts and are all explained within the topic-related disclosures. The actual positive impacts are:

- Quality and complaints management
- Product responsibility
- Customer service and customer proximity
- Protection against over-indebtedness
- Access to banking products for people with disabilities

In addition, there is a potential positive impact on privacy, which is covered by the entity-specific disclosure on the topic of data protection. The issue of protection against over-indebtedness is also associated with a potential opportunity for the Bank.

The identified negative impact of Commerzbank on the satisfaction of its private customers constitutes a potential negative impact. These are counteracted by current strategies, policies and actions with a view to strengthening the positive impacts.

Potential negative impacts on private customers could arise from Commerzbank's business model, in turn affecting customer satisfaction. The entire financial sector, including Commerzbank, operates in a highly regulated environment with laws and regulations that are designed to protect consumers and end-users. In this respect, Commerzbank acts according to the rules and in compliance with the law. A negative impact on customer satisfaction is within the scope of the normal impacts inherent in an individual customer relationship, as can arise in connection with any economic activity.

To counteract potential negative impacts on the satisfaction of private customers, preventive actions are taken to ensure that the negative impact does not occur at all or is compensated, mitigated or eliminated.

The specified impacts, risks and opportunities can in principle relate to all of the Bank's private customers, with the exception of the actual positive impact "Access to banking products for people with disabilities", which is focused on the group of people with disabilities. There are two customer groups: private customers, and private customers with physical or cognitive impairments. With regard to protecting at-risk customer groups, we refer to the company-specific disclosures on protection against over-indebtedness and access to banking products for people with disabilities.

There are no matters in the Bank's value chain that have a systematic adverse effect on the health or personal rights of customers. The entity-specific disclosure on product responsibility also explains the role played by product and service-related information.

The disclosures on positive impacts explain the policies and actions that are intended to increase or give rise to the positive impacts and opportunities mentioned.

[IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

Methods and assumptions

The main impacts, risks and opportunities were identified in a multi-stage process. When preparing to perform the materiality assessment in accordance with regulatory requirements, the first step was to determine and define the scope of consolidation as well as the value chain and core activities of Commerzbank AG.

The methodology subsequently selected forms the basis for a reliable materiality assessment. To facilitate the efficient assessment of impact and financial materiality, a standardised questionnaire was developed to serve as the basis for structured implementation of the stakeholder analysis within the context of interviews and workshops. This standardised questionnaire bases assessment on a selection of topics that comprises those predefined in ESRS 1 AR 16 (as per regulatory requirements) and supplements them with topics that are specific to Commerzbank.

Interviews were conducted with internal and external stakeholders to determine the impact materiality, which was rated on a scale of 0 (irrelevant) to 10 (highly relevant) for the predefined topics. The financial materiality was assessed internally, taking into account the risk inventory, with the predefined topics rated on a scale of 0 to 10 (the same as for impact materiality). A topic was assessed as material if it reached a threshold value of 6.5.

The impact and financial materiality outcomes were then evaluated and validated to provide an initial indication of the general relevance of the various topics.

The next step involved defining and evaluating the impacts, opportunities and risks (IROs) in accordance with the regulatory requirements of the ESRS and the implementation guidelines of the EFRAG.

Independently of the results of the stakeholder survey, the IROs on all sustainability matters were determined in cooperation with the responsible experts, professionally validated and – in a next step – evaluated by the same responsible experts. The assessment methodology differs for positive and negative impacts as well as for opportunities and risks. It is based on the regulatory requirements of the ESRS and assesses the severity (consisting of the scale and scope for all impacts, as well as irremediable character for negative impacts) and the likelihood of occurrence, taking into account the applicable time horizon.

For the detailed assessment of the positive and negative impacts as well as opportunities and risks, all responsible experts were first acquainted with the assessment methodology and then invited to attend workshops to show them how to conduct the assessments, using selected IROs as examples. For each of the assessment steps (scale, scope and likelihood of occurrence), the responsible experts provided and documented a reason for each individual assessment. Assessment by the respective responsible experts was generally performed as a “gross assessment” (i.e. without taking account of remedial or support measures).

After this, quality assurance was performed for the assessed IROs using the indication obtained through the stakeholder interviews and then the assessment was validated in accordance with the reasons given. Based on this, possible deviations and quality assurance measures were documented and discussed with the responsible experts and, if necessary, incorporated into the findings. Finally, the IRO analysis was checked for consistency with the Annual Report in order to avoid discrepancies between the statements provided in the two reports.

Overview of the impact assessment process

The materiality of positive impacts is based on the assessment of scale, scope and likelihood of occurrence. The materiality of negative impacts is based on the same criteria and is additionally supplemented by irremediable character.

The scope of consolidation as well as the value chain and core activities of Commerzbank AG were analysed within the context of preparing the materiality assessment in order to define the core activities, business relationships and geographies. The identified core activities of Commerzbank AG include its own business operations and the banking business. The due diligence review is performed by the individual departments responsible for each topic.

The comprehensive analysis made it possible to incorporate potential risk drivers by adjusting the detailed assessment accordingly in the IRO analysis.

Twenty-three interviews were conducted with 32 internal and external stakeholders to determine the impact materiality. During these interviews, the stakeholders were asked about all identified topics and submitted their assessment thereof. External

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stakeholders include other banks, scientists, representatives of non-governmental organisations and the Commerzbank Sustainability Advisory Board, which also represents the Bank's customer perspective. The internal stakeholders surveyed were taken from Group Sustainability Management, Group Strategy, Group Organisation, Legal, Human Resources, Corporate Clients segment, and Private and Small-Business Customers segment. Stakeholders from the two largest subsidiaries, Commerz Real and mBank, were also involved.

Further analysis of the negative and positive impacts is performed independently of the outcome of the initial assessment. Consequently, all IROs are treated as equally material in line with their assessment. The responsible experts are in charge of prioritising and monitoring the topic-specific IROs. Overall monitoring of the IROs is explained in ESRS GOV-2. The results of the materiality assessment are used as a basis and taken into account accordingly.

Overview of the risks and opportunities assessment process

The materiality of risks and opportunities is determined by assessing their scale and likelihood of occurrence.

Within the framework of the CSRD, the analysis of interrelationships between impacts, dependencies, risks and opportunities plays an important role for sustainable corporate governance. This approach facilitates a comprehensive understanding of the complex interactions that influence Commerzbank's business strategy. To make sure the relationships were depicted accurately between impacts, on the one hand, and the risks and opportunities potentially arising from these impacts, on the other, the corresponding assessment was carried out by the respective responsible experts. This ensured that the reasons behind assessing the impacts were also taken into account when assessing the risks and opportunities.

The systematic assessment of risks and opportunities is a central component of Group sustainability reporting. This assessment was performed in multiple stages to ensure that we fully understand the material impacts of our business activities on the environment, society and economy. As stipulated in the implementation guidance, the likelihood of occurrence was determined using a five-point scale: low, medium, high, very high and actual. The scale of the impact was also assessed using a five-point scale: minimal to none, low, medium, high and very high. The type of impact was determined across three thematic dimensions: environment, social and business conduct.

At Commerzbank AG, sustainability risks are viewed as a cross-cutting topic that can manifest themselves in the traditional risk types. A special unit has been established in Risk Management, to take account of the particular importance of sustainability risks.

Decision-making process and internal control procedures

In a first step, the findings of the stakeholder survey (for the purposes of initial appraisal) were mapped to the results of the IRO assessment in order to provide a comparison and identify deviations. The second step included extensive quality assurance by independent third parties. As part of this quality assurance, the assessed IROs were validated and any identified anomalies were documented using quality assurance measures. Additional quality assurance and decisions regarding implementation of the actions were undertaken and documented by Group Sustainability Management. For IROs assessed by GM-STs using standards identified as non-material based on the initial stakeholder survey, quality assurance was performed by the responsible departments and then again by independent third parties.

Inclusion in the general risk management process

As stipulated by the Bank's internal hierarchy of responsibilities, environmental topics were assessed from the risk perspective by Group Risk Management Environmental Risk Control, and from the opportunity perspective by Group Sustainability Management. Social and governance issues were assessed by Group Sustainability Management, focusing on both the opportunity perspective and the risk perspective to determine financial materiality. Risk Management was also involved to assess the topics based on the findings of the risk inventory. Detailed descriptions can be found in ESRS E1 SBM-3 for climate and ESRS E4 SBM-3 for biodiversity. The impact assessments were performed by the responsible departments. Supplementary coordination and quality assurance was carried out centrally by Group Sustainability Management.

Based on the findings from the 2024 materiality assessment, the next reporting cycle will assess the extent to which existing risk management processes need to be expanded.

Input parameters

In order to provide as complete an overview as possible of all potentially applicable IROs, different perspectives were taken into account when defining the IROs. A list of suggestions for all standards was developed by the central CSRD project to aid in identifying impacts, risks and opportunities. Consistency in reporting is promoted by including new topics introduced by the ESRS and taking into account existing content from other reports, supplemented by suggestions from a market comparison on Group sustainability reporting. The IRO list was then validated by the departments and fleshed out with additional IROs to ensure it provides a complete picture. Finally, the GRM-RC division validated IROs for the portfolio from a risk perspective to reflect the risk view as it pertains to various ESRS topics.

Changes to prior reporting periods and dates of the next review

Since this is the first time this Group Sustainability Report has been published according to the ESRS, there are no changes to disclose compared to prior reporting periods.

[E1 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

The IROs were identified analogously to the overarching process. The impacts the Bank can have on climate change due to its financing activities, as well as the opportunities that could arise for the Bank from those of its financing activities that promote the climate-friendly transformation of the economy, were assessed first and foremost by experts from Group Sustainability Management, drawing on the expertise of various other areas of the Bank, where appropriate, particularly the corporate client business. For the 2024 financial year, the assessment was carried out predominantly in the form of a qualitative analysis.

The assessment of material risks was performed by experts from the Bank's Environmental Risk Control department, based primarily on the results of the annual climate risk materiality assessment. The sector-based SBTi steering at Commerzbank was used to identify the key business activities where considerable effort will be needed to make such activities compatible with the transition to a climate-neutral economy. The sectors covered by the Sectoral Decarbonization Approach (SDA) are extremely carbon intensive and account for up to 87% of the global carbon emissions budget by 2050, according to the Science Based Targets initiative. Commerzbank's objective within the context of its SBTi steering is described in more detail in ESRS E1-4. A more detailed description of this analysis can be found in ESRS E1 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model.

The impacts, opportunities and risks related to climate change in the Bank's own business operations were assessed by Commerzbank's experts in its Eco and Energy Management department, backed by their many years of experience in setting up and managing an ISO-certified energy and environmental management system.

[E2 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities relating to pollution

As part of the risk assessment, Commerzbank AG evaluates the negative impacts on the environment based on the following drivers: non-greenhouse gas emissions, impacts from toxic soil and water pollutants, impacts from soil and water pollutants, and the creation and discharge of waste. When translating this to the risk perspective, a regulatory filter is also added to assess whether the negative impacts from the sectors could translate into a transition risk. For this purpose, we consult applicable legal provisions as well as regulatory requirements such as the EU Biodiversity Strategy; the Zero Pollution Action Plan for Air, Water and Soil; the EU Circular Economy Action Plan; and the German Biodiversity Strategy. The risk assessment for 2024 concluded that individual analysis of pollution as a driver does not result in a material transition risk for the Bank. So far, the assessment only takes into account the respective sector, not the upstream or downstream value chain. No consultations were carried out, including with affected communities.

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Commerzbank AG used the WWF Biodiversity Risk Filter to perform an analysis of the dependencies and impacts of its locations with regard to the topic of pollution. No consultations were carried out with potentially affected communities as part of the analysis. The analysis shows that Commerzbank AG has no increased negative impacts or dependencies on environmental pollution in its direct operating business.

IE3 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities relating to water and marine resources

As with the procedure described in ESRS E2 IRO-1, the risk assessment was again carried out from the impact and dependency perspective, encompassing the risk drivers of freshwater use, water consumption, water supply, water purification and water flow control. For water and marine resources, no material risk was identified for the Bank from either a physical or transition risk perspective.

Commerzbank AG used the WWF Biodiversity Risk Filter to perform an analysis of the dependencies and impacts of its locations with regard to the topic of water and resource management. No consultations were carried out with potentially affected communities as part of the analysis. The analysis shows that Commerzbank AG has no material negative impacts or dependencies on water and other resources in its direct operating business.

IE4 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities relating to biodiversity and ecosystems

A separate analysis applying the WWF Biodiversity Risk Filter is used to determine the material impacts, risks and dependencies of Commerzbank AG's own banking operations on biodiversity, ecosystems and biodiversity sensitive areas. Further information can be found in ESRS E4 SBM-3.

The IROs for the banking business with regard to the topic of biodiversity and ecosystem services were determined in line with the overarching process. The assessment of material transition and physical risks was performed by the Bank's experts on environmental risks, based primarily on the findings of the annual environmental risk materiality assessment. Further information can be found in ESRS E4 SBM-3.

The material impacts that Commerzbank AG can have on biodiversity in connection with its financing activities are a key impact driver for transition risks and were therefore also included in the environmental risk materiality assessment. Given the limited pool of data, this impact assessment is currently only carried out on a sector-specific basis, not a location-specific basis. For this reason, no meaningful consultation with affected communities is possible at the present time.

The material opportunities that arise for Commerzbank AG from financing the protection of biodiversity and ecosystem services are identified according to the overarching processes that apply to all sustainable financing as described in ESRS IRO-1.

[E5 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities relating to resource use and circular economy

A risk assessment was also carried out for resource use and circular economy analogous to ESRS E2 IRO-1 and E3 IRO-1. As part of this analysis, Commerzbank AG considered resource use from an impact and dependency perspective, assessing the risk drivers of freshwater use, seabed use, land use, water use, abiotic and biotic resources, animal energy, biomass, genetic material and water supply. No material risk was identified for the Bank in terms of resource use and the circular economy, either from an impact or dependency perspective.

Commerzbank AG used the WWF Biodiversity Risk Filter to perform an analysis of the dependencies and impacts of its locations. No consultations were carried out with potentially affected communities as part of the analysis. However, the tool’s methodology does not explicitly take the aspects of resource use and circular economy into account, meaning that no specific conclusions can be drawn regarding dependencies and impacts.

[G1 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities relating to business conduct

The IROs were identified analogously to the overarching process. Concerning IROs within the context of the company’s policy on managing relationships with suppliers, including payment practices, consideration was given to aspects including due diligence vis-à-vis business partners to ensure respect for human rights, prevention of child and forced labour, relevant guidelines for suppliers, and the established codes of conduct aimed at reducing negative impacts on the environment and society.

[IRO-2] Disclosure requirements covered

Using ESRS 1 AR 16 as a base, the list of topics provided therein was supplemented with company-specific topics. For each of these topics, at least one positive and one negative impact were identified, as well as an opportunity and a risk. Based on the IROs identified as material, the IROs were assigned to the disclosure requirements under ESRS in order to ascertain which disclosure requirements need to be disclosed for each standard. This was then used to define and develop the qualitative and quantitative datapoints at the individual level together with the responsible experts, including process descriptions, information on estimation methods and calculation formulas. The table below lists all the disclosure requirements and data points that derive from the ESRS, cross-referencing the corresponding sections in this report.

The next table lists all data points that derive from other EU legislation, cross-referencing the corresponding sections in this report.

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E4-6	Anticipated financial effects from material biodiversity and ecosystem-related impacts, risks and opportunities	Except for disclosures on paragraph 45 (a-c), which are not reported as at 31 December 2024 in accordance with the relief provided for phased-in disclosure requirements.	114
ESD	Entity-specific disclosure of the €300bn target		115
Social disclosures			
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S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions		123
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities		124
S1-6	Characteristics of the undertaking's employees		124
S1-8	Collective bargaining coverage and social dialogue		126
S1-9	Diversity		128
S1-10	Adequate wages		130
S1-12	Persons with disabilities		130
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S1-14	Health and safety metrics	Except for disclosures on para. 88 (a-e), which do not need to be reported as at 31 December 2024 in accordance with the relief provided for phased-in disclosure requirements.	134
S1-15	Work-life balance metrics		134
S1-16	Remuneration		136
S1-17	Incidents, complaints and severe human rights impacts		137

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Disclosure requirement	Comments	Page number
S4-1	Policies related to consumers and end-users	139
S4-2	Processes for engaging with consumers and end-users about impacts	140
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	140
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	141
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	142
ESD	Entity-specific disclosure: Product responsibility	142
ESD	Entity-specific disclosure: Customer satisfaction	143
ESD	Entity-specific disclosure: Customer service and customer proximity	144
ESD	Entity-specific disclosure: Protection against over-indebtedness	145
ESD	Entity-specific disclosure: Access to banking products for people with physical and cognitive impairments	146
ESD	Entity-specific disclosure: Data protection	147
Governance disclosures		
G1-1	Business conduct policies and corporate culture	149
G1-3	Prevention and detection of corruption and bribery	151
G1-4	Incidents and actions related to corruption or bribery	153
ESD	Entity-specific disclosure: Prevention of money laundering and terrorist financing	154
ESD	Entity-specific disclosure: Tax transparency	156

**List of datapoints in cross-cutting and topical standards that derive from other EU legislation
(according to ESRS 2, Appendix B)**

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	Indicator number 13 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		50
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		50
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator number 10 Table #3 of Annex 1				58
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) i	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013: Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Not applicable according to EFRAG Q&A
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not applicable according to EFRAG Q&A

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not applicable according to EFRAG Q&A
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not applicable according to EFRAG Q&A
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	94
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		94
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book-Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		97
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Indicator number 5 Table #1 of Annex I and Indicator number 5 Table #2 of Annex 1				Not material
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator number 5 Table #1 of Annex 1				Not material
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Not material
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		101
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		101
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	110
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paras. 46 and 47; Template 5: Banking book-Climate Change			Not material

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Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
physical risk, paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 (c)		physical risk: Exposures subject to physical risk			
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 para. 34; Template 2: Banking book-Climate Change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral			Not material
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Not material
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material
ESRS E3-1 Water and marine resources, paragraph (9)	Indicator number 7 Table #2 of Annex I				Not material
ESRS E3-1 Dedicated policy, paragraph 13	Indicator number 8 Table #2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations, paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material
ESRS 2 – IRO 1 – E4, paragraph 16 (a) i	Indicator number 7 Table #1 of Annex I				72
ESRS 2 – IRO 1 – E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				72
ESRS 2 – IRO 1 – E4, paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				72

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				111
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				111
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				111
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Not material
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator number 9 Table #1 of Annex 1				Not material
ESRS 2 SBM-3 – S1 Risk of incidents of forced labour, paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				76
ESRS 2 SBM-3 – S1 Risk of incidents of child labour, paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				76
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				118
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		118
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator number 11 Table #3 of Annex I				118
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator number 1 Table #3 of Annex I				Not material
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				120
ESRS S1-14 Number of fatalities and number and rate of work- related accidents, paragraph 88 (b) – (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material, not applicable as at 31 December 2024
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Material, not reported as at 31 December 2024 in accordance with the

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Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
					relief provided for phased-in disclosure requirements.
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		136
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Not material
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				137
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD, paragraph 104 (a)	Indicator number 10 Table #1 of Annex I and Indicator number 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		137
ESRS 2 SBM-3 – S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	Indicators number 12 and number 13 Table #3 of Annex I				Not material
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator number 9 Table #3 of Annex I and Indicator number 11 Table #1 of Annex I				Not material
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicators number 11 and number 4 Table #3 of Annex I				Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights and OECD, paragraph 19	Indicator number 10 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator number 14 Table #3 of Annex I				Not material
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator number 9 Table #3 of Annex I and Indicator number 11 Table #1 of Annex I				Not material

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph, paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not material
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator number 14 Table #3 of Annex I				Not material
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex I				139
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD, paragraph 17	Indicator number 10 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		139
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator number 14 Table #3 of Annex I				141
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator number 15 Table #3 of Annex I				149
ESRS G1-1 Protection of whistleblowers, paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				149
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		153
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				153

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Environmental standards

Disclosures pursuant to Article 8 of Regulation 2020/852 (EU Taxonomy)

Incorporating EU Taxonomy

With the European Green Deal, which envisages greenhouse gas neutrality by 2050, the EU has set itself ambitious sustainability targets. 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, aligned 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 2024 reporting year, Commerzbank AG is reporting on its Taxonomy-aligned exposure for the second 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 social minimum safeguards.

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

An economic activity is considered a “taxonomy-eligible economic activity” if it is included in the separately adopted acts relating to Article 3d of the Taxonomy Regulation (EU) 2020/852, regardless of whether it meets all the technical assessment criteria outlined connected to it. An economic activity shall be

considered a “taxonomy-aligned economic activity” if it complies with all the requirements of Article 3 of the Taxonomy Regulation, including the technical assessment criteria outlined in Article 3d.

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.

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 GAR assets. The GAR is published once in relation to existing business (stock) and once in relation to new business (flow). The GAR (stock) relates to the stock positions within our assets as at 31 December 2024, specifically the lending and investment business, including loans, bonds and equity instruments.

In addition to the GAR (stock), we are publishing the following key performance indicators in this report (see the Notes, page 93 ff.):

- GAR (flow): indicates the inflow of new Taxonomy-aligned assets relative to the total covered GAR assets. The inflow is clearly identified by the start date of an exposure, which is defined depending on the asset 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.

The flow KPIs for AuM and financial guarantees (AuM KPI, FinGuar KPI) have been disclosed for the first time for the 2024 reporting year. This has been supplemented by first-time publication of the prior-year figures. The corresponding sections in the table are marked T-1. The EU Taxonomy only covers certain parts of our business. Some exposure is completely excluded, for example the trading portfolio (until the 2026 financial year) and exposure towards governments or central banks. In addition, the GAR denominator includes portfolios that cannot be reported as Taxonomy-aligned, for example loans to SMEs. The total

amounts of numerator and denominator therefore differ significantly from one another.

The exposure that is relevant for the numerator is generally exposure towards companies that are required to submit a non-financial report (NFR) in accordance with the Accounting 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 exposure towards households and towards local and regional authorities is also taken into account. In the case of special financing for special purpose vehicles (SPVs) 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 assets 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 use of proceeds).

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 Article 8 and Article 9 of the Disclosure Regulation) with the product-specific KPI. We do not carry out a “look-through” approach for other funds. For bonds where the 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 KPIs are available, all bonds will be assessed using the issuer’s turnover-based and CapEx-based KPIs.

The counterparty KPIs are obtained from an external data provider. The information provided refers to the companies’ disclosures for the 2023 reporting year. If no information was available, we assessed these positions as Taxonomy-non-eligible or Taxonomy-non-aligned. Exposure towards subsidiaries required to publish a non-financial report with parent companies also required to publish a non-financial report are assessed based on the parent company’s disclosed KPIs.

For the 2024 reporting year, subsidiaries that are not subject to reporting were included for the first time. If there are no separate KPIs for the subsidiaries, the KPIs of the parent company are also used, significantly increasing the volume of assets analysed compared with the previous year. This expanded scope was based on FAQ 13 issued by the EU Commission, which was published in the Official Journal in November 2024. The expansion to include the customer group of local/regional authorities on the basis of FAQ 47 also increased the assessment population. The total covered assets therefore increased compared to the previous year (see Template 0; % of total assets covered in the 2024 financial year at 41.31%, in the previous year 2023 still at 32.98%).

When screening loans where a use of proceeds is known, the review 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 an exposure 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 impaired 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 further software solutions in 2024 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 exposure that is 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 (FINREP). The mBank data was collected locally and then integrated into the Group-wide figures. The calculation was based on gross carrying amounts.

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

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

		Total environmentally sustainable assets ¹	KPI (Turnover) ²	KPI (CapEx) ²	% coverage (over total assets) ³	% 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)
Main KPI	Green asset ratio (GAR stock)	2.93	3.33	3.59	41.31	32.17	26.52
Additional KPIs	GAR (Flow)	0.80	0.90	1.05	9.27	8.41	18.51
	Trading book ⁴	-	-	-	-	X	X
	Financial guarantees	0.00	1.34	1.61	X	X	X
	Assets under management	9.02	9.85	10.55	X	X	X
	Fees and commissions income ⁵	-	-	-	-	X	X

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

² Based on the Turnover KPI and CapEx KPI of the counterparty.

³ Percentage of assets covered by the KPI over banks total assets.

⁴ 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.

⁵ 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 (GAR stock) is characterised by retail mortgage financing and special financing for SPVs in the field of renewable energies. The Taxonomy alignment check for the 2024 reporting year was extended to financing outside the European Economic Area. The share of total environmentally sustainable assets (for which the use of proceeds is known) increases to 2.93% (see Template 0; previous year: 2.28 %). The total GAR stock increases by 42% to 3.33% (turnover KPI; previous year: 2.34%) and 48% to 3.59% (CapEx KPI; previous year: 2.43%). Although the taxonomy-aligned business increases significantly overall, the effect is mitigated by a similar increase in the size of the denominator (total GAR assets).

The current reporting of Taxonomy-aligned assets refers to environmental objectives 1 (climate change mitigation) and 2 (climate change adaptation), as it did for the 2023 reporting year. Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplemented the EU Taxonomy with technical screening criteria for four additional environmental objectives. With respect to the four additional environmental objectives, financial institutions will initially only have to provide information regarding Taxonomy eligibility for the 2023 and 2024 reporting years. The full reporting requirements for Taxonomy alignment will apply starting from the 2025 reporting year. Accordingly, the columns in the templates for data on Taxonomy alignment for the environmental objectives – three to six have been left empty.

Taxonomy-eligible activities must be assigned to one – specifically– the most relevant – environmental objective. Double counting is not permitted. The Taxonomy eligibility of loans with a

purpose known use of proceeds was screened for all six environmental objectives. The loans are consequently assigned to the first environmental objective. There is no remaining amount that is allocated to other environmental objectives. For general-purpose loans and securities, the company KPIs were used. For the 2024 financial year, the availability of KPIs improved significantly; moreover, KPIs could be used for the first time for Taxonomy alignment of financial institutions.

The extension of the EU Taxonomy to include nuclear and gas entered into force on 1 January 2023, so the corresponding data for companies – and, for the first time, also for financial institutions – 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 GAR (stock). In addition, we are required to report the shares in the GAR (stock) in separate templates in the Notes. We have not provided any further templates for the additional KPIs for reasons of non-materiality and readability.⁷ We have not identified any loans with a purpose 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 assets involving fossil fuels and generally take a critical view of such exposure. 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.

⁷ FAQ 29 issued by the EU Commission in November 2024 requires banks to add another nine nuclear and gas templates to all KPIs. For the 2024 reporting year, this would correspond to 27 nearly empty templates.

[E1-1] Transition plan for climate change mitigation

Commerzbank aims to actively shape the transformation towards a sustainable economy. To achieve this, we have established a comprehensive sustainability strategy, with the core objective of becoming a Net-Zero Bank. Further information on key components of this sustainability strategy can be found in ESRS E1-2 and E1-4.

So far, Commerzbank has not published an explicit transition plan for climate change mitigation, as required under ESRS E1-1. We are currently developing such a climate transition plan, in which we will disclose further information about our transformation path. Approval by the Bank's Board of Managing Directors and subsequent publication of the climate transition plan are earmarked for 2025.

[E1-2] Policies related to climate change mitigation and adaptation

Banking operations

Commerzbank AG has set itself the goal of reducing emissions from its own operations to net zero by 2040. This applies to all locations in Germany and abroad. Unavoidable CO₂eq emissions are offset by certificates from CO₂eq reduction projects. Renewable energies play a central role in our energy supply. Furthermore, we aim to achieve a climate-neutral supplier portfolio by 2040.

Our strategies incorporate climate change mitigation, energy efficiency and other environmental criteria in accordance with the principles of the UN Global Compact.

In implementing our goals, we are committed to complying with relevant standards and initiatives enacted by third parties, including in particular the Paris Agreement, the Science-based Targets initiative (SBTi) and the UN Global Compact. In addition, we are a member of the Association for Environmental Management and Sustainability in Financial Institutions (Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e. V. (VfU)).

With these strategies and policies, Commerzbank is responding to the material impacts of its business activities. By publicly communicating our climate change mitigation targets, we can set a benchmark and have a positive influence on competitors.

These overarching objectives, strategies and standards apply to all sustainability policies in relation to banking operations and are publicly available on our website.

ESG framework

Our ambitious sustainability targets are published and described in our ESG framework. The core components of the framework that are central to banking operations include sustainable operations and stakeholder management.

Responsibility for the ESG framework lies with Group Sustainability Management, while Group Organisation & Security oversees implementation of sustainable operations. The ESG framework applies to Commerzbank AG as well as to selected subsidiaries.

Commerzbank emphasises great importance to communication with all stakeholders, encompassing our customers, investors, rating agencies, analysts, non-governmental organisations, policymakers and the general public. We keep in contact with our major stakeholders through personal dialogue, discussion events, strategic partnerships and various public communication channels.

Progress is monitored by means of an annual process for collecting, analysing and reporting relevant operational-environmental sustainability indicators.

Commerzbank environmental guidelines

Our comprehensive environmental guidelines outline the principles of environmentally friendly business activities. These guidelines are based on international standards and take into account all relevant aspects along our entire value chain, including the core elements of corporate responsibility, climate change mitigation and climate change adaptation, resource-conserving energy use, prevention of environmental damage, promotion of biodiversity, transition to a circular economy, climate-neutral supplier portfolio, mobility of our employees and ongoing improvements to our environmental performance. The environmental guidelines adopted by the Board of Managing Directors serve as operating procedures for all employees of the Commerzbank Group. The Group Organisation & Security division is responsible for implementation. Our environmental and energy management system

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is certified according to ISO 14001 and ISO 50001 for Commerzbank AG and selected subsidiaries. This underlines our commitment to continuously improve our environmental performance and energy efficiency. Regular reports to the Board of Directors ensure the effectiveness of our management systems.

Standard for sustainable procurement

With its standard for sustainable procurement, Commerzbank has laid down binding guidelines governing sustainability matters when purchasing goods and services. The environmental, social and governance criteria specified in the standard reflect Commerzbank's corporate responsibility demands of its service providers and suppliers. Therefore, Commerzbank also actively influences the sustainable orientation of suppliers and service providers through purchasing decisions.

The regulations defined by Corporate Procurement are binding for all units of Commerzbank AG both in Germany and abroad. The target group includes all process participants involved in procurement. The standard serves as a framework for subsidiaries in Germany and abroad when making internal decisions based on company-specific requirements.

The standard for sustainable procurement promotes sustainable development in the procurement process. The defined criteria and rules of conduct are intended to make the consideration of sustainability aspects practicable for all process participants. In addition, the standard aims to raise awareness among Commerzbank employees on the topic of sustainability.

Within the context of the internal control system, controls have been defined for evaluating suppliers prior to entering into new contractual relationships as well as for managing existing suppliers. These also include ESG criteria as a part of an overall scoring model. When selecting suppliers, Commerzbank's Reputational Risk Management analyses the suppliers on a case-by-case basis. The commissioning organisational units and Corporate Procurement evaluate service providers to ensure compliance with the requirements outlined in the standard. We notify suppliers of any necessary improvements in terms of sustainability performance and document the results of the assessments.

Banking business

Commerzbank AG's climate change mitigation targets in the customer business and the steps required to achieve these objectives are explicitly governed by the ESG framework and the associated internal "ESG Framework Policy". In this policy and the underlying procedures, Commerzbank AG sets out the building blocks of its sustainability strategy and describes how the three sustainability KPIs are managed:

- Net zero carbon emissions in the loan and investment portfolio by 2050
- Mobilising €300bn in sustainable products by 2025
- Net zero carbon emissions in banking operations by 2040

One concrete goal is therefore to create transparency in our sustainability activities, including a clear definition of what ESG means in our customer business. The framework also presents our sustainable product solutions and consolidates the sustainability guidelines and exclusion criteria. Commerzbank published a revised framework in February 2025, which has been updated to include an expanded and optimised set of sustainability targets and has undergone a fundamental redesign in terms of structure.

Climate change mitigation and climate change adaptation are addressed in the ESG framework and in the corresponding policy, primarily through the net zero target, SBTi management, binding exclusion criteria and minimum standards, consideration of climate matters in risk management, as well as by financing sustainable projects and offering sustainable products. The topic of renewable energies is addressed through financing for projects in this area, for example through the Centre of Competence Green Infrastructure Finance.

The main objective of the framework and internal policy is to create a Bank-wide standard that enables stringent management of the relevant products, processes and activities, paving the way for the sustainable transformation of Commerzbank AG. The ESG framework therefore describes both Commerzbank's impacts on the environment ("Save the World" perspective) and the environment's impacts on Commerzbank AG ("Save the Bank" perspective), encompassing both the risk and impact perspectives of the associated business activities. Significant opportunities arise in the sustainability context from sustainable product solutions (financing and investments), which are covered by the €300bn target. Commerzbank AG's sustainability efforts as described in the framework are operationalised and monitored using the three sustainability KPIs. The Group Sustainability Board, a Bank-wide committee focusing on sustainability issues that is attended by members of the Board of Managing Directors, is responsible for the ESG framework. The head of Group Strategy, Transformation & Sustainability division and the steering committee of the strategic initiative "Sustainability 360°" are responsible for the internal policy.

The process of developing the ESG framework actively incorporated the interests of relevant internal and external stakeholders (e.g. political bodies, non-governmental organisations, customers and investors) and directly involved internal stakeholders. With regard to the internal policy, all relevant departments were likewise consulted during the drafting process.

The ESG framework is available on our website. The internal policy, as part of the written rules of procedure, is available internally to all Commerzbank employees. Various other guidelines and procedures within the Bank, including those from other departments, are linked or sub-assigned to the policy.

Managing financed emissions via the SBTi

Commerzbank has implemented a wide range of internal guidelines and procedures to manage the requirements under the SBTi. These steering guidelines, which also clarify the roles and responsibilities for SBTi management, outline the minimum standards adopted by Commerzbank for SBTi management both at the level of the overall portfolio and for the individual business segments. The most important guidelines include the following:

- The Net Zero (SBTi) Steering Guideline defines roles and responsibilities for net zero and SBTi management and sets minimum standards for managing portfolios and individual business areas.
- The Net Zero (SBTi) Portfolio Calculation & Target Setting Procedure defines the SBTi target curves for the portfolios, the relevant sectors and the underlying parameters.
- Various other steering guidelines and procedural instructions specify the segment-specific steering requirements for the corporate client business, the private customer business and Treasury. These include control measures, reporting obligations, and roles and responsibilities.

The target group of these guidelines, which were approved by the relevant competent authorities, are the responsible divisions within Commerzbank AG. The overarching Net Zero (SBTi) Steering Guideline was also initially approved by the Group-wide sustainability project at Board level, following alignment with the relevant stakeholders. The internal guidelines form part of the written framework and are available internally to all employees of Commerzbank AG. The key principles of portfolio management under the SBTi are also communicated externally as part of the ESG framework.

The process of developing the SBTi target pathways is subject to regular monitoring and quarterly updates to senior management, including the Board of Managing Directors of Commerzbank, by means an internal report detailing the progress made on achieving the SBTi targets. A traffic light system was developed in 2024 to evaluate deviations in actual development from the target curves and devise appropriate countermeasures where necessary, depending on the extent of deviation from the target pathway. In addition, the SBTi Net Zero Dashboard, designed as a controlling instrument, has been continuously expanded to improve performance and deliver more meaningful results. Finally, the data basis has been optimised, new real data has been integrated and work has begun on preparing implementation of the new SBTi standard for financial institutions.

Our risk management addresses both the physical and transition risks identified in the annual materiality assessment for climate-related risks, while SBTi management addresses the identified impacts. More details on this analysis can be found in ESRS E1 SBM-3.

[E1-3] Actions and resources in relation to climate change policies

Climate change mitigation measures in banking operations

We are conscious of our responsibility as a company and are actively committed to the transformation towards an environmentally sustainable society. Through innovative technologies, energy efficiency measures, and the transition to renewable energy sources, we are consistently working on reducing our environmental footprint.

We have established an integrated environmental and energy management system (integriertes Umwelt- und Energiemanagementsystem (iUEMS)) in accordance with our environmental guidelines. Since 2009 Commerzbank AG and selected subsidiaries have had an environmental management system certified according to ISO 14001 and since 2015 an energy management system certified according to ISO 50001. This ensures that responsibilities, behaviors, processes and guidelines for implementing the corporate environmental and energy policy are systematically defined and documented. The focus is on optimising resource consumption, particularly in areas where we can have a direct impact on the environment, such as in building management and business travel.

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The primary purpose of the integrated environmental and energy management system is to continuously improve our environmental and energy performance. In addition, it contributes to minimise risks by regularly reviewing the status quo, which in turn enables us to identify areas early on where action is needed and take appropriate preventive measures.

In the reporting year, we implemented measures to reduce greenhouse gas emissions in banking operations. At Commerzbank AG's international locations, the power supply has been switched to green electricity. This initiative led to a reduction of indirect emissions in Scope 2 by approximately 3,900 t CO₂eq. Introducing green district heating at our headquarters also cut indirect emissions in Scope 2 by around 800 t CO₂eq. For the 2025 financial year, Commerzbank AG expects a further decrease in direct Scope 1 emissions of approximately 700 t CO₂eq, achieved by optimising the use of space at a major German location. These measures are important decarbonisation levers. The financial resources to implement the above-mentioned measures are available.

In addition to the measures described, further initiatives are in discussion to help us achieve our climate targets. We are committed to expanding our contribution to climate change mitigation and shaping a sustainable future together with our partners.

Financial resources for implementing measures

The CapEx and OpEx indicators are not suitable for the banking sector and therefore are not applicable, which is why we do not report the KPIs related to CapEx and OpEx. This is supported by the Taxonomy Regulation, which in Article 8 refers to turnover, CapEx (capital expenditure) and OpEx (operational expenditure) as key performance indicators for non-financial companies.

Climate change mitigation in customer business

A key driver of Commerzbank's efforts to have a positive impact on climate change and a core element of its sustainability strategy is the Bank's strategic target of reducing carbon emissions from its entire loan and investment portfolio to Net-Zero by 2050.

To achieve this goal, Commerzbank has identified and analysed carbon-intensive industries in its portfolio based on the methodological guidelines of the Science Based Targets initiative (SBTi) and defined target pathways until 2030 for reducing greenhouse gases based on scientifically calculated targets.

Using the SBTi method, Commerzbank has set concrete sector-specific targets for reducing the physical carbon emissions intensity associated with its loan and investment portfolio (including "financed emissions") with a view to achieving its Net-Zero commitment by 2050. Further information can be found in ESRS E1-4.

[E1-4] Targets related to climate change mitigation and adaptation

Setting GHG emissions reduction targets in banking operations

As a core driver part of our sustainability strategy, we have set ourselves the goal of reducing carbon emissions from Commerzbank AG's banking operations to Net-Zero by 2040. This includes all direct and indirect emissions that are under our operational control. We also aim to have a climate-neutral supplier portfolio by 2040. In setting our targets, we considered the interests of our stakeholders as well as the climate-related impacts, risks and opportunities categorised as material at that time. The reduction targets support the management of these factors in banking operations based on the double materiality analysis (see SBM-3).

For Commerzbank AG and selected subsidiaries, a GHG reduction target for banking operations has been set in line with the Science Based Targets initiative (SBTi). It envisages a 42% reduction in Scope 1 and Scope 2 GHG emissions by 2030 compared to the base year 2021⁸. This target has been validated by the SBTi as scientifically based and consistent with the Paris Agreement climate targets.

Our targets refer to CO₂eq, which includes CO₂ as well as other relevant greenhouse gases and ensures consistency with our CO₂eq accounting.

As part of the first-time application of CSRD requirements in the Bank's sustainability reporting, 2024 has been defined as the new base year.

⁸ Base value: 38,507 tonnes CO₂eq

Setting greenhouse gas reduction targets in our banking business

For Commerzbank's business model as a universal bank, financed emissions under Scope 3 are the main driver of greenhouse gas emissions. Cutting these emissions is a key goal of Commerzbank's sustainability strategy, which is why since 2021 Commerzbank AG has set itself the strategic target of reducing carbon emissions in its entire loan and investment portfolio to Net-Zero by 2050. This target and the steps defined to achieve it are also disclosed in Commerzbank's ESG framework (see ESRS E1-3). An interim target for the absolute reduction of greenhouse gas emissions is not planned at the present time. Managing emissions-intensive sectors through relative targets takes portfolio growth opportunities into account and in the long term will also reduce the financed emissions in absolute terms.

To that end, Commerzbank AG has identified and analysed carbon-intensive sectors in its portfolio based on the methodological guidelines laid down by the Science Based Target Initiative (SBTi). When setting its SBTi targets, Commerzbank used SBTi-aligned methodologies that apply the Sectoral Decarbonization Approach and aim to limit global warming to 1.5°C or well below 2°C. The targets are in line with international policy objectives such as the Paris Agreement and the EU's climate targets. For its science-based approach, the SBTi uses climate science models such as the pathways defined by the Intergovernmental Panel on Climate Change (IPCC) as well as scenarios developed by established players like the International Energy Agency (IEA). These determine the global carbon budget required to limit warming to 1.5 °C or well below 2 °C. Based on the climate science models mentioned above, the SBTi develops sector-specific criteria and methodologies that allow companies to set their own emissions reduction targets consistent with these pathways. These sector-specific decarbonisation pathways also take into account the broader context of sustainable development by incorporating relevant environmental, social and economic factors and pay attention to specific regional impacts exerted by the Bank's business activities. In addition, the SBTi reviews and approves companies' individual targets by means of a validation process to confirm that they meet the relevant criteria. This ensures that they are consistent with the latest climate science and best practices for reducing emissions.

Implementation at Commerzbank AG

All portfolios specified according to the SBTi method are managed with a focus on emissions-intensive sectors. These include power generation, aviation, automotive manufacturing, commercial real estate finance (residential and commercial use) and the production of cement, iron and steel. The private residential mortgage loan portfolio, which is deemed optional in the SBTi analysis, is also considered. By taking into account the most carbon-intensive elements of the overall economic value chain, it can be assumed that if these sectors are transformed, other parts of the portfolio will be transformed as well. Corresponding emissions intensity reduction targets by 2030 were formulated for all these portfolios for the first time in 2022 and subsequently validated by the SBTi in 2023. As announced in September 2023, Commerzbank has joined the Partnership for Carbon Accounting Financials (PCAF). Therefore, in 2023 we also adapted our methodology for calculating portfolio intensities to the internationally recognised PCAF standard. In the course of applying this standard, we additionally recalculated the starting point in the base year 2021 and determined new target values for 2030. The targets remained as ambitious as before, or became slightly more ambitious, because the sectors of cement and steel were 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 revalidation process. Methodological updates required by SBTi or PCAF moving forward will be reviewed and, depending on the decision, incorporated as needed in accordance with the prescribed transition periods. Another development was the SBTi Net-Zero Dashboard, which serves as a controlling instrument for the SBTi-relevant sectors. The dashboard provides an overview of the emissions intensities in the individual portfolios and shows the relation to the respective SBTi reduction pathway.

As part of the SBTi framework, two methods are applied for this Net-Zero target: first, the Sectoral Decarbonization Approach (SDA), a method for setting sector-specific intensity targets; and second, the Temperature Score approach, which helps financial institutions determine the current temperature score of their portfolio based on the public emissions reduction targets of their borrowers.

The following tables show the carbon reduction pathways we have defined up to 2030, broken down by SDA sectors and using the temperature score approach.

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Reduction targets under the Sectoral Decarbonization Approach (SDA)

Asset class ¹	Sectors	CO ₂ reduction paths until 2030 and achieved reductions 09/2024 ²				Utilisation in € bn, per 09/2024	Financed emissions in Mt CO ₂ eq, per 09/2024	Scope
		Reduction ambition	Target path	As-of date	Metric			
Consumer loans	Residential mortgage loans	57%	(1.5°)	12/2021 (Is)	45.8	96.8	1.8	Scope 1 and 2
				09/2024 (Is)	44.3			
				12/2030 (Target)	19.8			
Project financing/ corporate loans and investments	Energy	74%	(1.5°)	12/2021 (Is)	97.3	8.7	1.5	Scope 1
				09/2024 (Is)	62.2			
				12/2030 (Target)	25.6			
Corporate loans	Commercial real estate, commercial use	67%	(1.5°)	12/2021 (Is)	87.4	5.9	0.2	Scope 1 and 2
				09/2024 (Is)	86.3			
				12/2030 (Target)	28.4			
	Commercial real estate, residential use	57%	(1.5°)	12/2021 (Is)	36.6	3.2	0.0	Scope 1 and 2
				09/2024 (Is)	35.6			
				12/2030 (Target)	15.8			
Corporate loans and investments	Iron and steel	25%	(1.5°)	12/2021 (Is)	1.4	0.2	0.4	Scope 1 and 2
				09/2024 (Is)	1.3			
				12/2030 (Target)	1.0			
	Cement	23%	(1.5°)	12/2021 (Is)	0.7	0.1	0.3	Scope 1 and 2
				09/2024 (Is)	0.7			
				12/2030 (Target)	0.5			
	Automotive manufacturing	31%	(1.8°)	12/2021 (Is)	171.5	0.7	0.1	Scope 3
				09/2024 (Is)	148.5			
				12/2030 (Target)	117.7			
	Aviation ³	22%	(1.8°)	12/2021 (Is)	795.9	1.4	0.9	Scope 1 and 3
				09/2024 (Is)	809.6			
				12/2030 (Target)	620.3			

¹ If no emissions data are available for individual customers in SDA sectors, these are included in the temperature score. We comply with the SBTi minimum coverage rules.

² The specified carbon reduction pathways represent the actual or target status at the end of the respective period under review, with 2021 considered the base year and 2030 the target year.

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

Reduction targets under the Temperature Score method

Asset class	Sector	Metric	GHG Scope	Temperature Score ¹			Utilisation in € bn, per 09/2024	Financed emissions in Mt CO2eq, per 09/2024
				As-of date	Metric			
Corporate loans	All other	Temperature Score	Scope 1+2	12/2021 (Is)	3.11	° C	68.0	11.1
				09/2024 (Is)	2.89	° C		
				12/2026 (Target)	2.69	° C		
			Scope 1+2+3	12/2021 (Is)	3.15	° C		28.0
				09/2024 (Is)	2.95	° C		
				12/2026 (Target)	2.71	° C		
Investments ²	All other	Temperature Score	Scope 1+2	12/2021 (Is)	3.03	° C	19.7	1.9
				09/2024 (Is)	2.75	° C		
				12/2026 (Target)	2.63	° C		
			Scope 1+2+3	12/2021 (Is)	3.07	° C		3.0
				09/2024 (Is)	2.91	° C		
				12/2026 (Target)	2.66	° C		

¹ The specified temperature scores represent the actual or target status at the end of the respective period under review, with 2021 considered the base year and 2026 the target year.

² Utilisation in the investment asset class includes the Commerzbank AG stake in mBank (approximately €4.2bn as at September 2024); the information on financed emissions from this asset class does not include financed emissions from mBank.

Assessing performance

The percentage reductions in the specified sectors are derived from the applicable emissions intensity for the base year 2021 and the targets for 2030. The emissions intensities were calculated using the loan transactions and investments that were actually carried out and are relevant for the balance sheet. The SBTi also requires minimum levels of portfolio coverage; Commerzbank complies with these thresholds.

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 emissions intensities, customers in Commerzbank's portfolio must undertake major transformation efforts by themselves. Ultimately, however, the green transformation is a joint undertaking of the entire real and financial economy, as well as politics and society.

The SDA-relevant loan and investment portfolio consists of customers whose main activities can be attributed to the most carbon-intensive industrial sectors. The main drivers of sector-specific emissions intensities are the portfolio composition resulting from customers' drawdown patterns (i.e. utilisations), and the carbon emissions 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 September 2024 performed 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 emissions 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 carbon intensity in 2022, which so far could not be offset. Commerzbank had not yet established SBTi steering back in 2022. In real estate financing – in contrast to other sectors – the extent to which a transformation can be implemented in the sometimes 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. At present, it cannot be ruled out that these portfolios will not achieve their targets.

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Incorporation of SBTi targets in steering

Commerzbank also takes SBTi targets into account in its portfolio steering. For the steering of significant individual transactions in carbon-intensive sectors, a process has been established for evaluating relevant exposures in relation to the strategic sustainability targets, including the Net-Zero (SBTi) sector target pathways. This process has been in place since 2021 and is continuously updated and enhanced. The tools for SBTi portfolio steering will be progressively expanded. The steering was operationalised further in the 2024 reporting year.

Working with existing and new customers, we aim to achieve the targets using the following measures:

- Sector-specific client engagement dialogue, particularly in emissions-intensive sectors, and provision of dedicated human resources for this purpose
- Customer-specific transformation advice, including the financing instruments required for the transformation
- Classification of customers according to SBTi aspects, development of operational target pathways, and translation of targets into measures and financing solutions at customer level
- Active credit and investment portfolio management along the SBTi sector pathways
- Expansion of the sustainable product range
- Differentiated pricing models, on a portfolio-specific basis where feasible
- Consistent implementation of the fossil fuel guideline

The reduction of greenhouse gas emissions is achieved on the basis of internal control targets. These are not reported externally.

[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions

Basis for calculating gross GHG emissions from banking operations

Commerzbank determines GHG emissions based on the standard of the Association for Environmental Management and Sustainability in Financial Institutions (Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e. V. (VFU)). This is aligned to internationally recognised guidelines such as the Greenhouse Gas (GHG) Protocol, the Carbon Disclosure Project (CDP) and the Global Reporting Initiative (GRI). Emissions are calculated as CO₂ equivalents (CO₂eq), which makes it possible to compare the climate impact of different greenhouse gases. The GHG Protocol considers the following greenhouse gases: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs),

sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). The use of CO₂ equivalents allows companies to express their total greenhouse gas emissions in a comparable number.

For this purpose, consumption is recorded in the respective categories and converted into CO₂eq using defined emission factors. The majority of emission factors come from the EcoInvent database, one of the world's largest databases in the field of environmental accounting. The emission factors taken from the database are supplemented by official country-specific emission factors.

We differentiate emissions according to the GHG Protocol into the following globally common categories:

- Scope 1 comprises 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 both according to the statistical country mix (location-based method) and according to the actual purchased energy mix (market-based method). Both methods are included in our calculation of total emissions and are reported separately.
- Scope 3 relates to other indirect emissions from the upstream and downstream value chain.

The significance of emissions was also reassessed as part of CSRD implementation. As a financial institution, our greatest lever for decarbonisation lies in financed emissions (Scope 3.15 category). Due to the comparatively small share of remaining Scope 3 emissions, these categories were classified as not significant. To maintain continuity with our previous reporting, we will continue to publish Scope 3 emissions within the same scope as before.

These comprise other indirect emissions from the upstream and downstream value chain, including paper and water consumption, waste generation, activities related to fuels and energy, business travel and logistic transport, employee commuting and electricity used in home offices.

The consumption data, the collection method and the calculated CO₂eq emissions of Commerzbank AG are verified externally by DNV Business Assurance Certification (DNV Business Assurance Zertifizierung GmbH).

Reporting according to the CSRD or the ESRS has shifted the organisational boundaries of our reporting and the control approach, from the previously used operational control to a combined financial and operational control.

Operational control exists when Commerzbank has an influence on the assets or properties to be recognised, for example through the introduction and implementation of operational guidelines. Financial control exists when Commerzbank has control over the financial and business policy of the company whose assets are to be accounted for. Financial control can exist independently of operational control.

Total GHG emissions (in t CO₂)¹

tCO ₂ eq	Base year 2024	Previous year	Reporting year 2024	Reporting year/ Previous year %	Target year 2030	Target year 2050 ⁵	Annual % target/ Base year
Scope 1 GHG emissions							
Gross Scope 1 GHG emissions ²	351,909	-	351,909	-	-	-	-
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (in %)	-	-	-	-	-	-	-
Scope 2 GHG emissions³							
Location-based Scope 2 GHG emissions	76,019	-	76,019	-	-	-	-
Market-based Scope 2 GHG emissions ⁴	16,514	-	16,514	-	-	-	-
Scope 3 GHG emissions							
Gross indirect (Scope 3) GHG emissions	74,371,739	-	74,371,739	-	-	-	-
1 Purchased goods and services (paper and water)	1,639	-	1,639	-	-	-	-
3 Fuel and energy-related activities	53,233	-	53,233	-	-	-	-
4 Upstream transportation and distribution	6,358	-	6,358	-	-	-	-
5 Waste generated in operations	502	-	502	-	-	-	-
6 Business travel and logistic transport	12,222	-	12,222	-	-	-	-
7 Employee commuting and energy homeoffice	32,448	-	32,448	-	-	-	-
15 Investments	74,265,337	-	74,265,337	-	-	-	-
Total GHG emissions							
Total GHG emissions (location-based)	74,799,667	-	74,799,667	-	-	-	-
Total GHG emissions (market-based)	74,740,162	-	74,740,162	-	-	-	-

¹ Biogenic emissions are not reported because they do not occur (Scope 1), are not material (Scope 2 and upstream Scope 3 emissions) or cannot currently be measured due to the calculation methodology used (emission category 3.15).

² Of this, 7,712 t CO₂eq are attributable to other companies in which investments are made outside the group consolidated for accounting purposes, including contractual arrangements over which the company has operational control.

³ Of these, other companies in which investments are made outside the group consolidated for accounting purposes, including contractual arrangements over which the company has operational control, account for 63,926 t CO₂eq (location-based) and 9,842 t CO₂eq (market-based).

⁴ 99% of the total electricity procured was generated from renewable energy sources. Of this, the share of bundled instruments was 78%, while the share of unbundled instruments with regional certificates of origin was 22%.

⁵ Commerzbank AG has set itself a Net-Zero target for emissions category 3.15 by 2050 (see E1-4 for details). The goal is to reduce the emissions from banking operations (Scopes 1 and 2) to Net-Zero by 2040. See Table E1-6 "GHG emissions target values according to the previous control approach".

GHG emissions target values according to the previous control approach

tCO ₂ eq	2024 ¹	Target year 2030 ²	Target year 2040 ³	Annual % target/ Base year ⁴
Scope 1 GHG emissions under operational control	17,681	10,189	-	5
Scope 2 GHG emissions under operational control (market-based)	14,228	12,145	-	5

¹ The GHG emissions reported here for the Commerzbank Group follow the operational control approach prescribed by the GHG Protocol to date. The significant deviation versus the table above showing total GHG emissions results from assets over which Commerzbank has financial but not operational control.

² The GHG reduction target for banking operations has been set in line with the Science Based Targets initiative (SBTi) for Commerzbank AG and selected subsidiaries. It envisages a 42% reduction of Scope 1 and Scope 2 GHG emissions by 2030 compared to the base year 2021 with a baseline of 38,507 t CO₂eq, and follows the operational control approach prescribed by the GHG Protocol to date.

³ A Net-Zero target has been set for Commerzbank AG with a reduction of 90% CO₂eq compared to the base year 2021. Due to the differing organisational limits of the 2030 and 2040 targets, a target value for Commerzbank AG up to 2040 has not been provided.

⁴ The annual percentage target compared to the base year is based on the SBTi commitment for the base year 2021.

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Greenhouse gas intensity based on net revenue

The greenhouse gas intensity was calculated based on ESRS specifications. For this purpose, the items in the IFRS annual financial statements specified for inclusion by the Bank Accounting Directive were identified, added up and calculated in relation to greenhouse gas emissions. Net revenue consists of the following items in the Commerzbank Group's income statement:

- Interest income
- Dividend income
- Commission income
- Net income from financial assets and liabilities measured at fair value through profit or loss
- Other net income from financial instruments
- Current net income from companies accounted for using the equity method
- Other income

Greenhouse gas intensity based on net revenue

tCO ₂ eq/€	2024
Total GHG emissions (location-based) per net revenue	0.002849
Total GHG emissions (market-based) per net revenue	0.002847

Banking business: Application of the PCAF standard for carbon disclosure by financial institutions

As required by the ESRS, Commerzbank calculates financed emissions using the industry standard "Partnership for Carbon Accounting Financials" (PCAF) for carbon disclosure by financial institutions in Scope 3, Category 15. PCAF Standard A for financed emissions contains a methodology for investments and loans (owned financed emissions) as well as for asset management (managed financed emissions), covering a total of seven asset classes. Financial institutions are allocated a specific share of the emissions generated by counterparties in the real economy based on their share in financing. The PCAF reporting standard requires financial institutions to disclose the proportion of reported data as well as the proportion of data based on estimates or assumptions (proxy data) used to calculate the financed emissions, applying an average data quality assessment. PCAF's standardised approach thus facilitates consistent and comparable reporting and improves transparency in the financial sector with regard to its climate-related impacts.

All assets that fall under the asset classes covered by the PCAF standard are included in the calculation. Assets that do not fall under the standard are excluded from the calculation of financed emissions, because no standardised methods are available. Assets that are outside the CSRD scope of consolidation are also excluded. These include, for example, Commerzbank's asset management services for external capital management companies.

The calculation methodology for each asset class differs according to the PCAF standard and also depends on the granularity of the available financial and emissions data. Information on this is disclosed via the PCAF data quality score. Owned and managed financed emissions are reported separately and are not aggregated to reflect the differing nature of the Bank's financing activities and varying levels of influence.

In accordance with the disclosure requirements under the PCAF standard, Commerzbank meets all mandatory requirements ("shall disclose") as well as additional voluntary requirements ("should disclose"). An overview of the information reported for each asset class, in particular which scopes of financed emissions are subject to reporting, can be found in the following list together with the data-points used for the purpose of determining data quality.

Emissions data used

As defined in the PCAF standard, the emissions data used follow a data hierarchy. According to this hierarchy, verified or unverified reported data from counterparties, where available, are the most granular and preferable option (data quality: score 1 to 2). This is followed by data based on physical activity (score 3) and finally data based on the economic activity of the financed company (e.g. sector-country averages, score 4 to 5). According to the PCAF standard, the data quality score is reported separately for Scope 1 and Scope 2 as well as for Scope 3 (if reported).

The data used by Commerzbank to calculate owned and managed financed emissions vary due to diverging datasets and availability, different use cases and licensing purposes within the Bank. Different emission sources with the most recently available data points are used across all assets (PCAF database, Asset Impact, MSCI, Bloomberg and reported data). Managed financed emissions related to asset management are allocated to the PCAF asset classes "Listed equity and corporate bonds" and "Sovereign debt", each weighted according to the share of funds invested in the respective asset class. The fund's emissions intensity is applied to all risk positions, even if the fund is partially covered by emissions data according to MSCI. In addition, the average intensity of the "Listed equity and corporate bonds" and "Sovereign debt" portfolios was applied to funds and companies without MSCI emissions data.

For purposes of transparency, below is a general overview of Commerzbank's approach and data sources for each asset class:

- **Listed equity and corporate bonds** (owned and managed financed emissions):

Use of reported emissions data for counterparties (where available) from MSCI and Bloomberg (scores 1 and 2); use of physical activity factors from data provider Asset Impact for counterparties in sectors for which decarbonisation pathways (Sectoral Decarbonization Approach, SDA) are defined under SBTi (score 3); and use of economic activity-based emissions factors from the PCAF database (score 5) for the remaining counterparties. Within the context of managed financed emissions, asset class averages are used as an approximation when MSCI data points are not available. Financed emissions are reported for Scope 1 and Scope 2 and separately for Scope 3.

- **Business loans and unlisted equity** (only owned financed emissions):

Use of physical activity-based emission factors from data provider Asset Impact for counterparties in SBTi SDA sectors (score 3); and use of economic activity-based emissions factors from the PCAF database (score 5) for the remaining counterparties. We list all required customers within the "Business loans and unlisted equity" asset class in accordance with the PCAF standard. Others are excluded, such as federal and state governments. Financed emissions are reported for Scope 1 and Scope 2 and separately for Scope 3.

Commerz Real reports the Scope 3 emissions related to its equipment leasing portfolio on a property basis in accordance with the PCAF standard covering economic activity-based emissions factors from external data sources (score 5).

- **Project finance** (owned and managed financed emissions): The project finance asset class at Commerzbank AG exclusively contains financing of renewable energies. Here, an emissions intensity of 0 t CO₂ emissions/EUR was assumed due to negligible Scope 1 and Scope 2 emissions.⁹ Scope 3 emissions are not currently reported because PCAF does not require disclosure for project financing and limited data are available.

Commerz Real reports Scope 2 and Scope 3 emissions related to its material asset investments in the field of renewable energies on a property basis in accordance with the PCAF standard covering production-related data (scores 2 and 3). Aquila uses the PCAF database (score 5). Financed emissions are reported for

Scope 1 and Scope 2 and, if available, separately for Scope 3 (this is a voluntary disclosure based on data availability).

- **Commercial real estate** (owned and managed financed emissions):

Use of estimated emissions factors from the Climate Excellence Tool per usable floor area based on location (country), building type and year of construction (score 4). Commerz Real follows the PCAF approach for commercial real estate emissions and reports total operational emissions in Scope 1 and Scope 2.

Financed emissions are reported for Scope 1 and Scope 2. Scope 3 emissions are currently not calculated or reported in accordance with the PCAF standard. The subsidiary Aquila uses data from the European Building Emission Factor Database (score 3).

- **Mortgages** (owned financed emissions only):

Use of emission factors per floor area from data provider Sprengnetter based on estimated building energy consumption (score 4). The subsidiary mBank uses data from the PCAF European Building Emission Factor database (score 4). Financed emissions are reported separately for Scope 1 and Scope 2. Scope 3 emissions are currently not calculated or reported in accordance with the PCAF standard.

- **Motor vehicle loans** (only owned financed emissions):

This asset class was excluded from Commerzbank AG's reporting due to its small size, as the exposure is not material compared to the overall portfolio. Commerz Real likewise does not report this asset class because the equipment leasing portfolio falls exclusively under the PCAF asset class "Business loans and unlisted equity". mBank uses data from the DEFRA and KOBIZE databases (scores 3 and 4) as well as PCAF proxies (score 5).

- **Sovereign debt** (owned and managed financed emissions):

Use of the PCAF database (score 1, score 3 or score 5 depending on the source of proxy data) for owned risk positions, MSCI data for managed risk positions. If MSCI data points are not available, asset class averages are used as an approximation. The calculation applied the asset's book value as the utilisation. The PCAF proxy emission factors were calculated using the most recently available datapoint, converted from international dollars to euros using an exchange rate that corresponds to the proxy year. Financed emissions are reported for Scope 1 and Scope 2 and separately for Scope 3. The disclosure for Scope 1 and Scope 2 is again made both including and excluding LULUCF, i.e. land use, land use change and forestry.

⁹ Financed emissions for the financing of other projects are reported via the counterparty in the listed equity and corporate bonds asset class.

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Measurement uncertainties

The use of approximations and proxy data from external carbon data sources is indicated and reported according to the data quality score, taking into account the specific source (see above). Furthermore, quantitative key figures do not contain any measurement uncertainties. Business data (in particular utilisations) at individual transaction level were taken from Commerzbank's core database and are therefore not based on approximations or estimates.

The following tables disclose the financed emissions disaggregated by PCAF asset class and by NACE sector for the "Business loans and unlisted equity" asset class. Owned and managed financed emissions are reported separately as described.

Overall, the total volume of financed emissions amounts to approximately 74 Mt CO₂. The "Business loans and unlisted equity" asset class accounts for a particularly high share of around 68% of financed emissions. The remaining emissions are distributed primarily across the "Listed equity and corporate bonds" asset class with around 17%. The "Mortgages" (residential mortgages), "Sovereign debt" and "Commercial real estate" asset classes consequently account for relatively minor shares of the total volume. It should be noted that, as defined by the PCAF standard, Scope 3 emissions are only reported in the "Business loans and unlisted equity", "Listed equity and corporate bonds" and "Sovereign debt" asset classes.

Owned financed emissions (disaggregated by PCAF asset class)

PCAF Asset Class	Sector (if applicable)	Total outstanding loans and investments Mio €	Scope 1 and 2 emissions tCO ₂ eq	Weighted data quality score (1 (high) - 5 (low)), Scope 1 and Scope 2	Scope 3 emissions tCO ₂ eq	Weighted data quality score (1 (high) - 5 (low)), Scope 3 separately ²
Listed equity and corporate bonds		34,230.0	2,791,475.6	3.9	1,633,758.5	3.9
Business loans and unlisted equity		85,190.0	20,184,862.0	4.5	30,223,360.1	4.6
Project finance	Power generation	6,464.4	0.0	-	0.0	-
	Planes	-	0.0	-	0.0	-
	Ships	-	0.0	-	0.0	-
	Other projects	-	0.0	-	0.0	-
	Total	6,464.4	0.0	3.0	0.0	4.9
Commercial real estate	CRE Commercial Use	6,969.0	243,466.1	-	0.0	-
	CRE Residential Use	3,213.9	28,200.8	-	0.0	-
	Total	10,182.9	271,666.9	4.0	0.0	4.0
Mortgages	Residential Mortgages	107,631.9	2,206,471.7	4.0	0.0	-
Sovereign debt	Sovereign debt (inclusive LULUCF ¹)	21,874.7	5,895,929.8	2.0	1,269,025.5	4.0
	Sovereign debt (exclusive LULUCF ¹)	21,874.7	5,966,753.3	2.0		
Motor Vehicle Loans		81.4	32,512.9	3.8	0.0	-
Total		265,655.5	31,382,918.9	4.0	33,126,144.2	4.2

¹ LULUCF refers to land use, land use change and forestry).² Data quality scores are reported at asset class level.

Managed financed emissions (disaggregated by PCAF asset class)

PCAF Asset Class	Sector (if applicable)	Total outstanding loans and investments Mio €	Scope 1+2 emissions tCO ₂ eq	Weighted data quality score (1 (high) - 5 (low)), Scope 1 and Scope 2	Scope 3 emissions tCO ₂ eq	Weighted data quality score (1 (high) - 5 (low)), Scope 3 separately ²
Listed equity and corporate bonds		15,338.2	1,167,782.9	3.4	6,869,947.9	3.5
Business loans and unlisted equity		0.0	-	-	-	-
Project finance	Power generation	4,684.4	3,783.9	-	83,017.2	-
	Planes	70.7	137,509.4	-	35,026.6	-
	Ships	3.2	3,509.7	-	306.1	-
	Other projects	1,259.1	376,075.9	-	262,716.8	-
	Total	6,017.5	520,878.8	4.1	381,066.7	4.4
Commercial real estate	CRE Commercial Use	16,458.7	103,780.8	-	0.0	-
	CRE Residential Use	1,617.8	5,001.9	-	0.0	-
	Total	18,076.5	108,782.7	2.3	0.0	0.0
Mortgages	Residential Mortgages	0.0	-	-	-	-
Sovereign debt	Sovereign debt (inclusive LULUCF ¹)	2,999.3	502,897.0	3.8	204,918.5	4.6
	Sovereign debt (exclusive LULUCF ¹)	2,999.3	526,431.0	3.8		
Motor Vehicle Loans		0.0	-	-	-	-
Total		42,431.5	2,300,341.5	3.1	7,455,933.0	3.9

¹ LULUCF refers to land use, land use change and forestry).² Data quality scores are reported at asset class level.

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Owned financed emissions in the PCAF asset class “Business loans and unlisted equity”, disaggregated by NACE level 2

NACE level 2		Total outstanding loans and investments Mio. €	Scope 1 and 2 emissions tCO ₂ eq	Scope 1 and 2 emission intensity tCO ₂ eq/Mio. €	Scope 3 emissions tCO ₂ eq	Scope 3 emission intensity tCO ₂ eq/Mio. €	
Agriculture, forestry and fishing	A.01	Crop and animal production, hunting and related service activities	594.7	1,446,857.3	2,432.8	332,722.6	559.5
	A.02	Forestry and logging	2.4	5,818.1	2,439.5	1,351.2	566.6
	A.03	Fishing and aquaculture	2.2	5,030.4	2,249.7	1,168.2	522.5
Mining and quarrying	B.05	Mining of coal and lignite	72.0	117,645.0	1,633.5	60,196.5	835.8
	B.06	Extraction of crude petroleum and natural gas	530.4	355,261.5	669.9	125,500.7	236.6
	B.07	Mining of metal ores	72.3	103,042.2	1,426.1	119,772.2	1,657.6
	B.08	Other mining and quarrying	187.5	170,252.8	908.2	88,318.3	471.1
	B.09	Mining support service activities	6.2	7,845.8	1,258.6	2,256.7	362.0
	C.10	Manufacture of food products	3,024.3	688,916.1	227.8	3,006,510.1	994.1
Manufacturing	C.11	Manufacture of beverages	366.6	94,126.1	256.7	325,491.5	887.8
	C.12	Manufacture of tobacco products	253.7	9,072.2	35.8	52,261.3	206.0
	C.13	Manufacture of textiles	237.4	29,541.0	124.4	87,953.2	370.5
	C.14	Manufacture of wearing apparel	260.3	20,300.5	78.0	77,022.4	295.9
	C.15	Manufacture of leather and related products	112.8	13,468.9	119.4	41,997.1	372.2
	C.16	Manufacture of wood and of products of wood and cork, except furniture, manufacture of articles of straw and plaiting materials	768.8	116,579.9	151.6	274,536.7	357.1
	C.17	Manufacture of paper and paper products	880.4	132,735.5	150.8	300,628.5	341.5
	C.18	Printing and reproduction of recorded media	255.8	34,982.2	136.8	76,205.8	298.0
	C.19	Manufacture of coke and refined petroleum products	465.5	381,825.5	820.2	485,281.5	1,042.4
	C.20	Manufacture of chemicals and chemical products	2,444.6	1,069,039.8	437.3	1,239,782.3	507.1
	C.21	Manufacture of basic pharmaceutical products and pharmaceutical preparations	1,200.6	259,011.5	215.7	371,788.0	309.7
	C.22	Manufacture of rubber and plastic products	1,381.5	348,335.1	252.1	710,172.2	514.0
	C.23	Manufacture of other non-metallic mineral products	917.4	598,270.6	652.1	631,981.2	688.9
	C.24	Manufacture of basic metals	1,030.7	836,233.8	811.3	1,377,544.2	1,336.5
	C.25	Manufacture of fabricated metal products, except machinery and equipment	2,118.4	461,433.9	217.8	1,145,224.2	540.6
	C.26	Manufacture of computer, electronic and optical products	2,535.0	112,181.6	44.3	414,563.1	163.5
	C.27	Manufacture of electrical equipment	1,273.7	92,757.7	72.8	1,476,764.1	1,159.5
	C.28	Manufacture of machinery and equipment n.e.c.	3,593.9	191,074.5	53.2	1,854,655.5	516.1
	C.29	Manufacture of motor vehicles, trailers and semi-trailers	4,751.0	149,663.0	31.5	1,729,299.3	364.0
	C.30	Manufacture of other transport equipment	1,169.7	25,740.6	22.0	629,280.5	538.0
	C.31	Manufacture of furniture	218.1	48,920.2	224.3	86,752.2	397.8
	C.32	Other manufacturing	1,057.8	45,892.0	43.4	279,012.8	263.8
	C.33	Repair and installation of machinery and equipment	45.4	26,109.4	574.7	39,923.9	878.8
Electricity, gas, steam and air conditioning supply	D.35	Electricity, gas, steam and air conditioning supply	3,230.4	3,896,901.9	1,206.3	1,353,602.0	419.0

NACE level 2			Total outstanding loans and investments Mio. €	Scope 1 and 2 emissions tCO ₂ eq	Scope 1 and 2 emission intensity tCO ₂ eq/Mio. €	Scope 3 emissions tCO ₂ eq	Scope 3 emission intensity tCO ₂ eq/Mio. €
Water supply; sewerage, waste management and remediation activities	E.36	Water collection, treatment and supply	145.6	163,688.6	1,124.3	16,598.5	114.0
	E.37	Sewerage	224.2	253,713.9	1,131.6	25,179.4	112.3
	E.38	Waste collection, treatment and disposal activities, materials recovery	743.2	768,814.3	1,034.4	139,494.3	187.7
	E.39	Remediation activities and other waste management services	319.6	341,197.7	1,067.5	45,244.8	141.6
Construction	F.41	Construction of buildings	672.1	62,767.6	93.4	326,515.0	485.8
	F.42	Civil engineering	422.6	32,821.9	77.7	178,273.4	421.9
	F.43	Specialised construction activities	580.9	37,370.3	64.3	216,551.4	372.8
Wholesale and retail trade; repair of motor vehicles and motorcycles	G.45	Wholesale and retail trade and repair of motor vehicles and motorcycles	1,194.8	154,546.7	129.3	295,063.3	247.0
	G.46	Wholesale trade, except of motor vehicles and motorcycles	7,510.5	3,982,382.6	530.2	5,849,105.4	778.8
	G.47	Retail trade, except of motor vehicles and motorcycles	2,548.1	261,557.6	102.6	552,993.5	217.0
Transportation and storage	H.49	Land transport and transport via pipelines	1,007.7	184,864.0	183.4	194,409.2	192.9
	H.50	Water transport	268.8	37,227.0	138.5	31,127.6	115.8
	H.51	Air transport	1,570.6	791,063.4	503.7	799,372.7	509.0
	H.52	Warehousing and support activities for transportation	1,890.3	223,610.6	118.3	320,221.4	169.4
	H.53	Postal and courier activities	229.2	33,723.4	147.2	33,867.2	147.8
Accommodation and food service activities	I.55	Accommodation	336.5	9,319.1	27.7	73,234.1	217.6
	I.56	Food and beverage service activities	108.7	8,237.1	75.8	18,352.7	168.9
Information and communication	J.58	Publishing activities	694.7	18,668.8	26.9	28,591.9	41.2
	J.59	Motion picture, video and television programme production, sound recording and music publishing activities	294.8	13,317.7	45.2	17,946.5	60.9
	J.60	Programming and broadcasting activities	242.6	4,883.9	20.1	4,972.2	20.5
	J.61	Telecommunications	1,788.0	79,856.2	44.7	98,837.5	55.3
	J.62	Computer programming, consultancy and related activities	1,016.5	55,902.3	55.0	139,908.7	137.6
	J.63	Information service activities	388.7	15,378.4	39.6	39,251.6	101.0
	J.64	Financial service activities, except insurance and pension funding	13,888.3	48,585.6	3.5	177,813.2	12.8
Financial and insurance activities	K.65	Insurance, reinsurance and pension funding, except compulsory social security	42.0	28.3	0.7	163.1	3.9
	K.66	Activities auxiliary to financial services and insurance activities	547.3	2,777.6	5.1	6,659.5	12.2
Real estate activities	L.68	Real estate activities	3,169.8	127,162.3	40.1	617,723.1	194.9
Professional, scientific and technical activities	M.69	Legal and accounting activities	126.5	7,991.9	63.2	12,757.0	100.9
	M.70	Activities of head offices, management consultancy activities	2,586.6	146,127.4	56.5	319,357.6	123.5
	M.71	Architectural and engineering activities, technical testing and analysis	318.1	62,746.5	197.3	96,459.6	303.3
	M.72	Scientific research and development	22.8	2,456.9	107.9	4,925.5	216.2
	M.73	Advertising and market research	169.4	16,825.9	99.3	25,823.9	152.4
	M.74	Other professional, scientific and technical activities	502.0	23,827.7	47.5	40,297.6	80.3
	M.75	Veterinary activities	79.6	2,770.8	34.8	12,674.2	159.1
	N.77	Rental and leasing activities	1,352.2	61,378.2	45.4	201,248.6	148.8
	N.78	Employment activities	347.7	46,708.8	134.3	77,248.5	222.2

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NACE level 2		Total outstanding loans and investments Mio. €	Scope 1 and 2 emissions tCO ₂ eq	Scope 1 and 2 emission intensity tCO ₂ eq/Mio. €	Scope 3 emissions tCO ₂ eq	Scope 3 emission intensity tCO ₂ eq/Mio. €
Administrative and support service activities	N.79	Travel agency, tour operator and other reservation service and related activities	259.0	23,184.3	89.5	35,134.8
	N.80	Security and investigation activities	100.1	28,606.6	285.8	55,051.0
	N.81	Services to buildings and landscape activities	67.6	14,289.3	211.4	22,528.9
	N.82	Office administrative, office support and other business support activities	386.0	30,543.8	79.1	47,449.5
Public administration and defence; compulsory social security	O.84	Public administration and defence, compulsory social security	31.4	1,581.7	50.4	2,207.7
Education	P.85	Education	81.1	4,959.1	61.1	8,915.8
Human health and social work activities	Q.86	Human health activities	661.0	34,624.7	52.4	95,709.6
	Q.87	Residential care activities	85.9	3,222.9	37.5	14,989.5
	Q.88	Social work activities without accommodation	28.4	811.8	28.6	5,100.9
Arts, entertainment and recreation	R.90	Creative, arts and entertainment activities	107.4	9,593.2	89.3	14,605.4
	R.91	Libraries, archives, museums and other cultural activities	3.8	227.7	60.4	323.4
	R.92	Gambling and betting activities	201.7	7,851.3	38.9	11,620.1
	R.93	Sports activities and amusement and recreation activities	167.0	8,994.9	53.9	16,139.3
Other services activities	S.94	Activities of membership organisations	150.3	10,157.2	67.6	13,926.5
	S.95	Repair of computers and personal and household goods	0.2	56.2	276.5	300.6
	S.96	Other personal service activities	446.6	26,766.7	59.9	41,472.1
Activities of households as employers; undifferentiated goods and services-producing activities of households for own-use	T.97	Activities of households as employers of domestic personnel	0.2	223.5	1,291.3	101.2
	T.98	Undifferentiated goods- and services- producing activities of private households for own use	0.0	-	-	-
Activities of extraterritorial organisations and bodies	U.99	Activities of extraterritorial organisations and bodies	0.0	-	-	-

[E1-7] GHG removals and GHG mitigation projects financed through carbon credits

GHG removal and storage

Climate change mitigation is an important aspect of our corporate responsibility. We continuously strive to further reduce our ecological footprint. We follow the principle of “Avoid and reduce before offsetting”. We offset unavoidable greenhouse gas emissions from our banking operations as well as selected Scope 3 emissions from Commerzbank AG by purchasing and cancelling high-quality carbon credits.

In the current reporting period, we offset a total of 96,934 tonnes of CO₂eq through the purchase and cancellation of carbon credits outside the value chain. Of this, 25% is accounted for by the “Delta Blue Carbon – 1” project in Pakistan, which uses nature-based methods to reduce carbon emissions through mangrove reforestation. The remaining 75% comes from projects to avoid carbon emissions, including the “Nouakchott 30 MW Wind Power Plant” (wind energy in Mauritania) and the “CTL Landfill Gas Project” (biogas in Brazil). All projects mentioned meet the recognised quality standards of the Verra Verified Carbon Standard or the Gold Standard. The “Delta Blue Carbon – 1” project can also provide so-called Corresponding Adjustments. Detailed information on the

individual projects can be found on our homepage on carbon offsetting for banking operations.

Offsetting is based on our annually recorded and externally verified Commerzbank AG greenhouse gas emissions. In the 2024 reporting year we offset both current emissions and parts of emissions from 2023.

Offsetting strategy

All projects meet the highest quality standards. The integrity of emission reduction projects and the carbon credits generated from them is crucial to achieve effective carbon offsetting. We therefore act according to our principles for compensating unavoidable carbon emissions when selecting projects. These principles relate to the quality of the credits, the technologies used and the countries where the projects are located. Offsetting is implemented exclusively through projects with generally recognised quality standards such as the Verra Verified Carbon Standard, Gold Standard or Plan Vivo. When selecting projects, we also follow the Core Carbon Principles (CCP) framework, which outlines a comprehensive approach to ensuring quality and integrity in the voluntary carbon market.

The focus of the projects we select is on countries in the global South, as these are often the ones most affected by the consequences of climate change.

We do not remove or store any greenhouse gases in our own operations or in the upstream and downstream value chain.

Information on the reduction and storage of greenhouse gas emissions through carbon credits in tCO₂eq

tCO ₂ eq	2024
GHG removals and storage in own operations and in the upstream and downstream value chain	-
GHG emission reductions or removals from climate change mitigation projects outside the value chain ¹	96,934

¹ The total also includes carbon credits cancelled with retroactive effect for the previous reporting year.

Carbon credits cancelled in the reporting year

	2024
Total in tCO₂eq¹	96,934
Share from reduction projects (in %)	75.3
Share from removal projects (in %)	24.7
Share of recognised quality standard "Gold Standard" (in %)	31.0
Share of recognised quality standard "Verra Verified Carbon Standard" (in %)	69.1
Share from projects within the EU (in %)	0.0
Share that qualify as corresponding adjustments (in %)	24.7

¹ The total also includes carbon credits cancelled with retroactive effect for the previous reporting year.

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Carbon credits planned to be cancelled in future

tCO ₂ eq	Amount until 2030
Carbon credits planned to be cancelled in the reporting period	0
Carbon credits planned to be cancelled in the future	1,066

[E4-1] Transition plan and consideration of biodiversity and ecosystems in strategy and business model

Commerzbank wants to play an active role in protecting biodiversity and ecosystems. We have developed a wide range of activities, measures and objectives for this purpose, which we describe in detail in ESRS E4-2 to E4-6. At the present time, however, Commerzbank does not have a comprehensive transition plan on this topic, since this was identified as immaterial for us during the materiality assessment. In addition, the methodological basis and data availability needed to draw up such a transition plan currently fall short of requirements. Commerzbank is actively working to solve these challenges. Further information can be found in ESRS E4-2 to E4-6.

Biodiversity risks, like climate risks, are regularly included in the business and sustainability strategy. As part of its annual strategy process, Commerzbank analyses various key indicators and environmental factors that are relevant to the Bank's strategy and business model. This analysis includes both internal perspectives (including employees) and external perspectives (including customers and investors). The results and conclusions from the holistic analysis are used in the downstream strategy process to develop the strategy and business model.

Commerzbank also conducts an annual assessment of the materiality of biodiversity risks, including their impact on business risks. The results of this analysis are used to help develop the business strategy, the business risk strategy and the various sub-risk strategies. For further information on how we incorporate biodiversity into our strategy and business model, please see ESRS E4 SBM-3.

[E4-2] Policies related to biodiversity and ecosystems

Almost all global economic activities depend on biodiversity and ecosystem services. A look at the current state of biodiversity makes it clear that the time for action is now.

Dependency and impacts on biodiversity can lead to physical and transition risks – but they can also create opportunities. For this reason, the topic of biodiversity is also of strategic importance for Commerzbank AG.

Concepts in Commerzbank's banking business

Commerzbank AG has already adopted specific positions and exclusion criteria geared to protecting biodiversity and ecosystems. Important aspects include land use change, pollution and the use of water and marine resources.

A major problem concerning land use change is deforestation. To minimise deforestation risks in Commerzbank AG's portfolio, we have formulated our own position on the topic of deforestation. For more information on this strategy, see ESRS E4-3 and E4-4.

Furthermore, in its position on mining, Commerzbank AG excludes the financing of mining projects that use mountain top removal (MTR) due to the damage this does to the surrounding area, as well as the financing of companies that mine coal using this method. This mining technique is extremely harmful to the environment and results in significant land use changes.

Ecological factors as well as reports of adverse impacts on high conservation value areas and UNESCO World Heritage Sites, for example in the energy and fossil fuel sectors, are also included in a case-by-case assessment. Taking these factors into account should help to preserve important ecological and cultural regions and mitigate changes in these areas.

With regard to the impacts of pollution on protecting biodiversity and ecosystems, Commerzbank AG also takes a critical view of issues such as water and groundwater contamination. The petrochemical sector is often closely linked with the topic of pollution, particularly water and groundwater contamination. Commerzbank AG therefore subjects business relationships with petrochemical companies and petrochemical projects to a differentiated case-by-case assessment, which can potentially lead to a business relationship or project being terminated or denied.

Commerzbank AG also takes the topic of water into account within the context of its asset management. Direct investments are excluded in companies where serious compliance violations have been identified with the principles of the UN Global Compact. These comprise, among others, minimum environmental standards with regard to impacts on the sustainable use and conservation of water and marine resources. Investments may be authorised in individual cases if Commerzbank analyses have identified a positive outlook for the company's development moving forward.

On the other hand, the financing that Commerzbank AG provides can also have a positive impact on protecting biodiversity and ecosystems. We classify the financing of nature-related activities as sustainable financing within the meaning of our ESG framework. Our sustainable product solutions include financing sustainable crop cultivation, sustainable forestry, conservation of natural areas and soil remediation. Such financing contributes directly to sustainable land use.

At Commerz Real, compliance with the exclusion criteria of Commerzbank AG in the fund business, for equity investments, in the mandate business and for equipment leasing is already ensured through the business models and through the restrictions imposed on specific asset classes.

Concepts in the context of risk management

Commerzbank's overall risk strategy sets out the Bank's strategic framework and, together with the Bank's sub-risk strategies, forms the basis for the risk strategies of its subsidiaries. Based on the risk inventory, the overall risk strategy defines biodiversity risks as a horizontal risk driver, meaning that biodiversity risks can have an impact on existing risk types.

The strategy also specifies how biodiversity risks should be integrated in the risk inventory. The overall risk strategy undergoes a comprehensive review in the second half of each year, before being submitted to the Strategic Risk Committee for a vote and subsequently to the Board of Managing Directors for approval. The overall risk strategy is then discussed by the Risk Committee of the Supervisory Board and brought to the attention of the Supervisory Board.

The ESG Risk Assessment Concept defines the framework for assessing ESG risks for Commerzbank Group, including biodiversity risks, and forms part of Commerzbank Group's stress testing framework. The document specifies the processes, methodological requirements, definitions and result parameters for the risk analysis and is updated annually. The overall document is approved by the Board of Managing Directors.

mBank policies

mBank has adopted a position on dealing with reputational risk-sensitive industries, which includes the protection of high conservation value areas, UNESCO World Heritage Sites and other protected areas. This position limits the impacts on biodiversity and ecosystem services and reduces possible land use changes in these areas. mBank takes due account of environmental risks and opportunities in its lending policy, which sets out requirements that must be met by corporate clients from sectors or economic activities with a high environmental risk as part of the risk assessment process. The directive also includes criteria for sustainability-related financing and defines a classification framework for sustainable loans. mBank does not yet take product traceability into account and has not formulated any explicit positions on the sustainable use of oceans or combating deforestation.

[E4-3] Actions and resources related to biodiversity and ecosystems

Commerzbank AG implements a wide range of measures to protect biodiversity and ecosystems. It has committed itself to the requirements of the Taskforce on Nature-related Financial Disclosures (TNFD), and since 2023 has been guided by the standards and requirements outlined in the TNFD in an ongoing effort to comply with these more completely and comprehensively.

In addition, Commerzbank AG is an active member of the Biodiversity in Good Company initiative (BiGCI), as part of which it works together with like-minded companies from the real economy to advocate for the protection and sustainable use of biological diversity, nurturing a productive dialogue and providing valuable insights.

Commerzbank AG has also defined various positions and exclusion criteria for its core business that contribute to protecting biodiversity and ecosystems. Further information can be found in section E4-2. The position on deforestation published at the beginning of 2024 and the associated target for 2025 represent an important measure in combating land use change. Further information

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can be found in ESRS E4-4. The position is aimed at corporate clients in regions and sectors with a high risk of deforestation, such as forestry, soybean cultivation, palm oil production and cattle farming. It requires that these companies provide proof of internationally recognised memberships such as the Roundtable on Sustainable Palm Oil (RSPO) or the Global Roundtable for Sustainable Beef (GRSB), or certifications such as the Forest Stewardship Council (FSC), the Programme for the Endorsement of Forest Certification (PEFC) or the Round Table on Responsible Soy (RTRS) by no later than end-2025. These memberships and certifications require companies to adhere to strict rules for protecting biodiversity and ecosystems and include regular audits and reports that document the status and changes in biodiversity. The geographical scope was analysed and defined individually for each sector: For the forestry sector, this affects all high-risk areas according to the Forest 500 High Risk Country List; for the palm oil sector it applies worldwide; and for the beef and soy sectors it pertains to the Amazon basin. The relevant countries in the Amazon basin are Brazil, French Guiana, Suriname, Guyana, Venezuela, Colombia, Ecuador, Peru and Bolivia. Commerzbank AG regularly analyses new developments on the topic of deforestation and will adjust its position accordingly if necessary.

In its business and business relationships in the field of biodiversity, Commerzbank AG also takes into account indications of human rights violations, including those affecting local communities and indigenous peoples. In addition, the assessment of reputational risk management incorporates a wide range of other factors, particularly in relation to compliance with environmental protection and sustainable land use practices, which in turn help to protect biodiversity and ecosystems. Further information can be found in our ESG framework, which is available on the Commerzbank website.

Commerzbank AG has held various dedicated information events for employees about protecting biological diversity and ecosystems in order to provide information to and raise awareness among its front office staff. At these events, interested employees are introduced to the basics of protecting biodiversity and ecosystems, and in particular to the challenges and requirements of our corporate clients; potential financing solutions relating to this topic are also explored.

Furthermore, Commerzbank AG plans to expand the quality and quantity of relevant ESG, location and supply chain data in order to improve its risk and impact assessment. The biggest challenges in identifying and managing biodiversity-related impacts and risks are the availability of relevant data and a lack of standardised metrics. When the necessary progress is made in this area, this will facilitate the development of location-based metrics and formulation of further nature-related positions and targets.

For sales, Commerzbank AG plans to integrate additional aspects of protecting biodiversity and ecosystems into its financial products and services, as well as more extensive information initiatives for sales teams.

In its sustainability strategy, Commerzbank AG focuses on avoiding negative impacts on biodiversity in the customer portfolio. Consequently, it does not implement any biodiversity offsetting measures.

It is currently not possible to quantify the resources that Commerzbank spends on biodiversity and ecosystems, as these are essentially opportunity costs. However, we are confident that these opportunity costs are offset in at least the same amount by the benefits that are derived for both biodiversity and Commerzbank.

The risk side of Commerzbank focuses on the execution and further development of risk analyses in order to obtain a more detailed understanding of the Bank's biodiversity risk profile. These are described in detail in the section E4 SBM-3. In addition, Commerzbank is also involved in various working groups and associations, including the Association for Environmental Management and Sustainability in Financial Institutions (VfU), as well as in a public-private partnership project headed by Wageningen University & Research with the aim of improving quantitative biodiversity risk analysis, also incorporating scenario analyses and stress tests.

[E4-4] Targets related to biodiversity and ecosystems

An important aspect of Commerzbank AG's position on deforestation is the concrete target that all corporate clients in the forestry, soy, palm oil and beef sectors in regions with a high risk of deforestation must demonstrate their commitment to combating deforestation through relevant memberships such as in RSPO or GRSB or certifications such as FSC, PEFC, RTRS or RSPO by no later than end-2025. Relevant customer relationships are subjected to critical review on a regular and targeted basis to ensure the targets are achieved. The objective is therefore essentially to demonstrate that the customer is committed to preventing and minimising land use change. This includes promoting product traceability, sustainable resources management and transparency in reporting, as well as mitigating the social impacts of biodiversity loss, upholding the rights of local communities and advocating for fair labour practices.

The objective also aims to address the challenges to protecting biodiversity and ecosystems that are not covered by the EU Biodiversity Strategy for 2030 and, in particular, the European Union Deforestation Regulation (EUDR). The EUDR only applies to raw materials and products imported into the European Economic Area. Commerzbank AG's position is therefore expressly aimed at all relevant corporate clients irrespective of whether the raw materials ultimately end up in the European Economic Area. Biodiversity offsetting measures and ecological thresholds are not taken into account when defining target and assessing their achievement.

Commerzbank AG is in continuous dialogue with the affected customers to achieve this objective. At the time of publication of the position on deforestation in early 2024, 15% of relevant existing customers did not meet the requirements. Further customers had submitted corresponding memberships and certificates by the end of 2024, bringing this percentage down to just 5%.

In addition to avoiding negative impacts, Commerzbank AG also wants to increase its positive impact on the protection of biodiversity. An important lever to help Commerzbank AG achieve its target of mobilising €300bn for sustainable financial products is therefore financing the protection of biodiversity, especially nature-based climate change mitigation measures. This volume also includes financing that has a positive impact on biodiversity. In general, Commerzbank AG sees significant and increasing potential for financing activities that can have positive impacts on protecting biodiversity, especially due to growing public awareness and regulatory requirements.

mBank performed a portfolio analysis on the topic of biodiversity for the first time in 2024 and will now use this as a basis for analysing the options to define specific goals in this area.

[E4-6] Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities

Lending volume relevant for biodiversity risk

The credit risk portfolio analysis using data from ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) and the WWF Biodiversity Risk Filter (WWF BRF) was used to define the metric specifying the lending volume relevant for biodiversity risk (34% of the overall portfolio¹⁰) for physical and transition biodiversity risks. When interpreting the results, it should be noted that a high theoretical risk assessment does not translate directly into a high credit risk. This is due to the fact that neither the ENCORE tool nor the WWF BRF assess a direct or customer-specific probability of default, but rather the dependencies and impacts of the sectors and countries. For a more precise quantification, a monetary impact assessment or cost-benefit analyses would be necessary, which are common in traditional economic risk assessments. A more detailed description of the methodology used can be found in ESRS E4 SBM-3.

Biodiversity dependency assessment in € billion exposure at default (EaD)



Of the entire portfolio, 36.5% was assessed as having a higher physical risk due to dependency on ecosystem services, 37.7% with a medium risk, and 25.8% with a lower risk. Sectors such as "electricity supply," "building construction," and "manufacture of chemical products" exhibit increased risks. Additionally, water-related ecosystem services such as "water supply" and "water flow regulation" are particularly relevant, as the assessed portfolio shows an increased dependency on these services.

¹⁰ The analysis considers a selection of portfolios where assessment is appropriate at sector and country level. Only the performing share of the portfolio is taken into account.

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Biodiversity transition assessment in € billion exposure at default (EaD)



Overall, 30.5% of the portfolio was rated as having a higher transition risk, 38.5% as having a medium risk and 31% as having a low risk. The sectors exhibiting an elevated risk include “electricity supply”, “manufacture of motor vehicles” and “wholesale trade”.

Assumptions and limitations

Using the ENCORE data and the WWF BRF data ensures an assessment on the basis of the current market standard for assessing biodiversity risks. Nevertheless, the limitations of the data and in particular the limitations in translating them into financial risks for the Bank must be taken into account. An important consideration when interpreting the results is that the ENCORE assessment does not allow comparison between risk drivers. Equally important, ENCORE uses data consisting of geographic averages and therefore does not take the geo-specific characteristics of the portfolio into account in the sector analysis. Furthermore, due to the nature of the analysis at sector level, no customer-specific risk characteristics are included in the assessment at this time.

Another important assumption is the assessment logic according to which each sector and country is classified as “higher”, “medium” or “lower”. Since no market standard exists, this is based on an internal classification. The assessment logic defines the number of risk drivers – for example with the rating “very high” and “high” – that are needed in order for the entire sector to be rated “higher”. This internal logic makes it difficult to compare different banks.¹¹

Despite limitations, the analysis using ENCORE and WWF BRF shows which sectors and risk drivers are particularly relevant for Commerzbank. It shows where the portfolio is especially dependent on which ecosystem services, and which negative impacts could potentially give rise to transition risks. The results provide an important basis for developing and refining the analysis.

Entity-specific disclosure: €300bn target

The transition to a sustainable and climate-neutral economy requires a tremendous amount of investment and innovation. Not only do the European Union and the German government expect the financial industry to help finance this transformation; Commerzbank is also firmly committed to this goal across all of its business areas as a universal bank.

By the end of 2025, Commerzbank intended to 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 target 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, and also included credit lines that had been approved but not yet accessed or KfW programmes that had been made available. The goal of mobilising €300bn for sustainable transformation is an expression of the role Commerzbank plays and the responsibility it takes in financing a sustainable transformation. The goal was not based on scientific findings or considerations. When it was developed in 2021, comparable targets defined by other banks were consulted as key stakeholders; however, stakeholders were not involved directly in the target development process.

In Commerzbank’s ESG framework, which came into force in 2024, we disclose the criteria used to classify financial products as sustainable. This provides transparency on the composition of the sustainable business volume according to the criteria applicable for 2024. The ESG framework was drafted and updated by Group Sustainability Management. It was adopted by the Group Sustainability Board as the highest decision-making body for ESG issues and is further specified through an accompanying policy. It applies to Commerzbank AG in Germany and abroad. Accordingly, the €300bn target also applied to Commerzbank AG in Germany and abroad.

By the end of 2024, Commerzbank had mobilised a total of €237.4bn for sustainable financial products. Of this, €151bn came from the corporate banking business, and €86.4bn from the Private and Small-Business Customers segment.

¹¹ The metric has not been validated by an external body (excluding the external auditor).

Another strong year in green infrastructure financing, which saw record growth in the fourth quarter, made a major contribution to performance in the corporate clients segment. The sustainable syndicated loan business was once again up on the previous year, but this was not able to fully offset the decline in new issues of sustainable bonds.

In the private and small-business customer segment, volumes trended upwards by €9bn in 2024, attributable in large part to

significant upticks in ESG fund volumes at both Commerzbank and Comdirect. In addition, the volume of green mortgage loans increased by 39% over the course of the year.

At the beginning of 2025, we replaced the €300bn target with a new objective: the sustainable loan ratio. This measures sustainable new lending business as a proportion of the total new lending business of Commerzbank AG. We will also continue to expand the range of sustainable products in our business areas.



Advisory products

(no balance sheet impact, €bn)

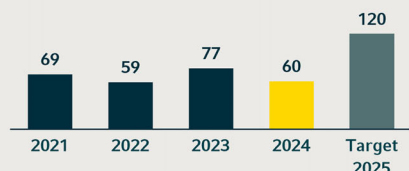


Loan products

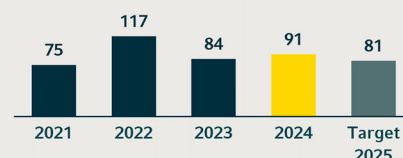
(with balance sheet impact, €bn)

Corporate Clients

- Accompanied ESG bond transactions (e.g. green and social bonds)¹
- Sustainable investment solutions for corporate clients²

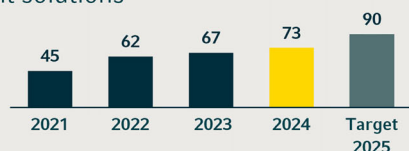


- Green infrastructure finance portfolio²
- Sustainability-linked loans¹
- KfW sustainability-linked programmes¹

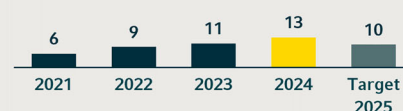


Privat- und Unternehmernkunden^{3, 4}

- Asset management, securities advisory and brokerage²
- Commerz Real products²
- Retirement solutions¹



- Green mortgages²
- KfW programmes²



¹ New business

² Existing Business

³ 2021 and 2022 numbers based on different method of calculation due to broader scope of included advisory products

⁴ Aquila Capital not included in figures

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Composition of the €300bn target

Sustainable products	Allocation to the €300bn target
Products in the Private and Small-Business Customers segment	
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	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 generally rules out the possibility of double counting with Commerzbank deposits.
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).
Products in the Corporate Clients segment	
Financing of renewable energies	Commerzbank includes all financing commitments made by CoC Green Infrastructure Finance (formerly 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 syndicated and bilateral loans as well as promissory note loans in which it was involved in the respective financial year by means of participation, coordination, structuring, syndication or placement, in the sustainable business portfolio of that financial year. These products include business loans, asset finance, export finance and leveraged finance lending. ¹
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 ESG / sustainability-linked loans and promissory note loans and promissory note loans). ²

¹ The products were expanded to include additional sub-products in the 2024 financial year.

² 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.

Social standards

[S1-1] Policies related to own workforce

The corporate success of the Commerzbank Group is based on qualified and content employees. Our 40,233 colleagues worldwide contributed their knowledge and experience to our work processes in 2024. 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 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 as well as collegial cooperation overall.

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 staff and service providers.

Consistency of the strategy(-ies) with internationally recognised instruments

Commerzbank's strategy is consistent with the United Nations Guiding Principles on Business and Human Rights. In addition, since January 2023, Commerzbank AG has been required to comply with the German Act on Corporate Due Diligence in Supply Chains Act (Supply Chain Due Diligence Act; LkSG).

Commerzbank is committed to the core labour standards of the International Labour Organization (ILO). The vast majority of the Commerzbank Group workforce works in a member state of the European Union (EU). These countries have enshrined the ILO standards in law. Commerzbank implements all applicable national legal requirements, including, not least, the freedom of association and freedom of coalition enshrined in Article 9 of the Basic Law. As a company based in Germany, Commerzbank has also committed to the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD). In addition, Commerzbank has been committed to the principles of the UN Global Compact since as far back as 2006. As part of this, the Bank undertakes to respect freedom of association and the effective recognition of the right to collective

bargaining, and to advocate for eliminating all forms of forced labour and child labour as well as eliminating discrimination in respect of employment and occupation.

We respect the human rights of our employees. This is expressed in Commerzbank's published position on human rights and in its policy statement pursuant to the Supply Chain Due Diligence Act. Last but not least, in our Code of Conduct we outline Commerzbank's understanding of human rights and our commitment to upholding human rights for all of our employees worldwide.

Information on strategies related to responsible procurement of services can be found in ESRS E1-2 in the "Standard for sustainable procurement" section.

Policies for combating discrimination and promoting equal opportunities

As a group, Commerzbank respects and promotes diversity and equal opportunities among its employees. When it signed the Diversity Charter in 2007, the company committed itself to creating a prejudice-free working environment that cultivates an atmosphere of openness and respect and provides room for innovation, creativity and courage. The Diversity Charter stipulates that all employees should be recognised, valued and included – regardless of their gender identity, nationality, ethnic origin, social background, religion or beliefs, disability, age or sexual orientation. We think that different educational backgrounds and experiences enrich the company as a whole and people should be encouraged to express their varying perspectives and talents. As one of the leading banks in Germany in the area of inclusion, we have established an action plan for integrating people with disabilities, which is now in its second edition.

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. We have anchored this principle in our Code of Conduct, in Diversity & Inclusion Standards and in relevant works agreements, among others. Commerzbank has a zero-tolerance policy for such situations. This policy states that any indication of non-compliance with the

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obligations under labour law will be addressed and, in verifiable cases, will result in appropriate measures under labour law. In addition, employees have access to various channels to report violations (e.g. whistleblowing tool).

Commerzbank has been a part of the UN Women's Empowerment Principles initiative since 2018. By signing the agreement, Commerzbank has committed itself to promoting gender equality within the Bank and within society.

[S1-2] Processes for engaging with own workforce and workers' representatives about impacts

Engaging with own workforce when managing impacts

Cooperation between the employee and employer sides of Commerzbank is based on mutual respect and trust. The works agreements concluded between these two sides take into account the Bank's objectives as well as the social interests of employees. That applies to the future as well.

The Group Works Council represents the interests of employees at Group level. It is responsible for dealing with matters that affect the Group or multiple Group companies and cannot be resolved by the individual central works councils within their respective companies. Its responsibility also extends to companies that have not formed a central works council and to Group company entities without a works council.

The interests of the employees of Commerzbank AG in Germany are represented by the Central Works Council, the central council for young persons and trainees (Gesamt-, Jugend- und Auszubildendenvertretung, GJAV), the Central Disability Representation- (Gesamtschwerbehindertenvertretung, GSBV), local works councils, representatives for young persons and trainees (Jugend- und Auszubildendenvertretung, JAV) and persons with severe disabilities (Schwerbehindertenvertretung, SBV), as well as the Senior Staff Spokesmen's Committee. The interest groups represent all employees of Commerzbank AG in Germany.

Works agreements govern the structure of the works council and cooperation between the members of the works council and the employer. The interests of employees are a crucial consideration in all discussions between the works council and the

employer and its representatives. The members of the works council are tasked with representing the views of employees and the interests of the workforce in their respective areas of responsibility.

The meetings of the various committees of the Central Works Council or Group Works Council as well as at local level are held according to individual, pre-arranged timetables, planned in coordination with the respective committees for periods of one calendar year. In addition, monthly and quarterly meetings are held with the Chairman of the Central Works Council and an employer representative. This representative may be the Head of HR or the Labour Relations Director. The highest-ranking authority is the Labour Relations Director in her function as the responsible Board Member for Human Resources.

This collaboration also involves a regular dialogue on the implementation of Commerzbank's human rights and environmental due diligence obligations, which gives works council members the opportunity to present the interests of the "vulnerable groups" in accordance with the German Supply Chains Due Diligence Act.

The satisfaction and motivation of the workforce are a good indicator whether the targets defined in our strategy resonate with employees and are supported and implemented accordingly.

An employee survey is conducted regularly for this purpose, at least once a year. This is used as a tool for employees to freely express their opinions and provide their assessment on different issues. Further information can be found in ESRS S1-5.

The findings provide a reliable picture of the current mood among the employees and are used to define fields of action and focal topics. The HR department offers the segments support during the follow-up process to interpret the results and, if necessary, derive appropriate measures.

We developed the Culture Award based on the insights gained from such a survey. This is described in more detail in ESRS G1-1.

As part of the reduction of carbon emissions and the transition to more environmentally friendly and climate-neutral activities, we currently do not anticipate any fundamental changes to Commerzbank's business model. As a result, no far-reaching changes are expected for Commerzbank employees at the present time. Commerzbank employees are actively involved in the company's future development through employee representation on the Supervisory Board. This also includes adjustments resulting from sustainability matters such as the transition to a climate-neutral economy. Involving employees in this way fosters a transparent and participatory process when structuring the transformation that takes into account the interests of the workforce as a whole.

Engaging with vulnerable groups when managing impacts

Through its measures to promote diversity and inclusion, Commerzbank supports the creation of employee networks and facilitates the work they do. This is a strategic focus and makes a valuable contribution to a vibrant and diverse corporate culture. These groups foster professional development through networking, allowing employees to share their experiences across segment and department boundaries and also providing vulnerable groups with crucial points of contact. The dialogue with these networks plays a vital role in safeguarding the interests of exposed groups, that Commerzbank identifies as part of the annual risk analysis under the Supply Chain Due Diligence Act.

Commerzbank's seven employee networks, each dedicated to a different focal topic, are networked across sectors to ensure they are optimally accessible to employees throughout the Bank.

The issues addressed by the employee networks are sexual orientation and identity (ARCO – the Pride Network of Commerzbank), parenthood and career (Fokus Väter), care (Pflege), people with and without disabilities (IDEAL), religion and beliefs (Ichthys – the Christian Network), advancement of women (COURAGE) and intercultural issues and social background (CrossCulture). Further details can be found on the Commerzbank website.

[S1-3] Processes to remediate negative impacts and channels for own workforce to raise concerns

The following statements on whistleblowing and consequence management relate to the companies included in the scope of consolidation as defined by the CSRD that are relevant for compliance and have been identified as material by the impact analysis used to determine key performance indicators, complementary information and disclosure requirements.

Some of the companies included in the scope of consolidation for the first time during the reporting period are still in the process of being integrated into the Group management system, known as Global Legal Entity Governance (LEG).

The Bank's internal Group Compliance division uses the LEG to manage the requirement to implement Group-wide compliance standards in affiliated companies – specifically, in Commerzbank subsidiaries and sub-subsidiaries.

The statements made implicitly include the companies newly included in the financial scope of consolidation, such as Aquila Capital Investmentgesellschaft mbH and Yellow Automation GmbH.

Approach to implementing remedial measures

Commerzbank strives to create a culture of open communication. This approach serves the purpose of openly discussing mistakes and avoiding them in future. A distinction is made between unintentional misconduct and deliberate violations.

Commerzbank is committed to punishing violations of legal and regulatory provisions, guidelines and rules. A consequence management system was introduced back in 2018 as part of a “culture of integrity” initiative. A uniform reporting process, a decision-making committee and an evidence board were set up for this purpose in order to create transparency about the consequences of incidents of misconduct and facilitate comparability. The anonymous depiction of misconduct by an evidence board enables the evaluation of this misconduct in relation to the measure decided upon and the identification of areas where rules and instructions need to be optimised. Deliberate violations of laws, guidelines and codes of conduct will not be tolerated. This includes:

- Criminal offences (for example fraud, corruption, tax evasion, insider offences or money laundering);
- Administrative offences (for example, infringements of money laundering due diligence, regulatory information and

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disclosure obligations or administrative orders of the German Federal Financial Supervisory Authority);

- Sexual harassment and discrimination;
- Violations of other legal requirements (for example EU regulations, the German General Equal Treatment Act);
- Violations of internal guidelines, policies and other provisions
- Human rights and environment related violations within the scope of the German Supply Chain Due Diligence Act.

Commerzbank therefore supports and protects all employees who identify and report misconduct. Anyone who reports in good faith suspicions of an economic crime, violations of the law or non-compliance with regulatory and internal requirements is afforded special protection. Employees also do not have to worry about adverse professional consequences – regardless of whether or not this suspicion ultimately turns out to be true. This applies to employees, customers and business partners alike. The events and facts are investigated independently of the person and position of those affected. If the incident is deemed to have violated human rights or environmental laws, or contributed in some way to a violation of this nature, immediate action will be taken to prevent, terminate or minimise the actions causing the violation.

The internal whistleblowing guidelines describe various options for reporting. Measures have also been established to protect whistleblowers, intermediaries and third parties, such as identity protection, confidentiality and the principle of non-discrimination. The internal guidelines also outline principles for preparing reports and describe the general processes and responsibilities related to whistleblowing. In addition, the requirements for reporting under the German Supply Chain Due Diligence Act are governed by rules of procedure that are available to the public.

If a suspicion of criminal offences or serious breaches of duty arises from the employment relationship, an investigation is carried out by a dedicated unit within the internal compliance department, whose work is independent and is committed to the principles of integrity and objectivity.

The basis for these investigations is a Group works agreement concluded with the workers' representatives. The findings of the investigation assist the responsible managers in making informed decisions. This can lead to measures under labour law but can also have consequences under criminal law or civil law.

Reporting channels

The Bank uses a web-based whistleblowing system as its main reporting channel for whistleblowing. This system allows users to set up an anonymous mailbox that they can use to communicate with the unit processing the case. A link to the whistleblowing system is provided right on the Commerzbank intranet homepage as well as on the Commerzbank homepage. It can be used to send reports to Commerzbank's internal reporting offices – quickly, easily and, if desired, anonymously. This also includes the possibility to submit notices about potential violations of the Supply Chain Due Diligence Act.

The Commerzbank homepage additionally contains an up-to-date overview of the domestic and foreign branches and subsidiaries connected to the whistleblowing system as well as the external reporting options available.

The whistleblowing system is certified according to ISO 27001 and is operated in a high-security data centre. The data is encrypted according to the highest possible standard, and access is restricted to a selected number of Commerzbank employees subject to a multi-stage login process.

Commerzbank has taken and documented measures to establish a sustainable whistleblower culture as part of the company's overarching culture of integrity, and to create trust in the structures and procedures involved. The whistleblowing system is frequently referenced via the Bank's intranet and included in training measures as part of the risk culture practised by the Bank.

For complaints in general and concerning employee matters, the following established internal reporting channels are available to resolve possible conflicts in the workplace or raise issues pertaining to working conditions:

The first step in resolving a complaint is to speak directly with the supervisor or manager overseeing the concerned staff member. The aim in doing so is to ensure that the manager is aware of the nature of the complaint and is in a position to provide immediate redress, if appropriate.

Employees can also contact Human Resources directly. It is the responsibility of the Bank as part of its overarching duties as an employer to address human resources issues and concerns affecting its employees.

Should employees so wish, they also have recourse to the works council or workers' representatives. In accordance with statutory co-determination, the works council has rights of information, consultation and participation to protect the interests of employees. The principles governing the treatment of employees are laid down by law.

The Bank and the works council must protect and promote the freedom of personal development of the employees working at the company. They are required to foster the independence and initiative of employees and working groups.

It is the interplay between these three functions (manager, human resources and works council) that safeguards the interests of employees and ensures their concerns are taken into account – also in individual cases.

In addition, employees can submit tips via Internal Audit, Compliance or the OpRisk Manager.

Indications of suspected criminal acts or serious breaches of duty arising from the employment relationship are investigated by a department mandated specifically for this purpose by the Board of Managing Directors. Significant cases are dealt with in a cross-divisional committee. Compliance controls as well as internal and external audits are conducted to ensure that the channels are working effectively.

Policies

The Global Whistleblowing Policy is intended to increase people's willingness to report suspected economic crimes and violations in respect of other reporting in order to ensure compliance with legal, regulatory and internal rules within Commerzbank. It describes the various options for reporting and the protections of whistleblowers and other persons named in the reports. In addition, it contains provisions on identity protection, confidentiality and the principle of non-discrimination, and also outlines the basis for preparing reports and describes the general processes and responsibilities related to whistleblowing.

The obligations set out in this policy apply to all employees of the Commerzbank Group, including management and employees of Group units. They also apply in principle to Group units in which Commerzbank holds a majority stake, even in countries where the legal requirements are less strict. The Commerzbank Group operates in various countries where local regulatory requirements, standards and expectations may differ from those described here. Deviating local requirements as well as legal restrictions that lead to non-compliance with internal Bank requirements or cause an exception must be documented in an addendum containing local specifics about the foreign entity in question. Supplementary or deviating requirements must also be specified in addenda and any related procedures or documents. Such addenda must be reviewed by the centrally responsible compliance unit before they are implemented.

If dedicated reporting channels are already in place for certain issues, such as suspected money laundering or customer

complaints, this policy shall not modify the specific guidelines applicable to those channels.

The policy is reviewed and updated regularly, at least every twelve months. If a special event occurs, an unscheduled audit – a so-called ad hoc adjustment – will be performed at short notice.

In addition, Commerzbank has established a Whistleblowing Procedure for dealing with whistleblowing cases relating to Commerzbank and its employees. This applies Group-wide. Local or subsidiary-specific addenda are also available if required, for example, if a country has restrictions on transmitting anonymous reports or enforces stricter legal regulations regarding which units may be informed about a report.

All whistleblowing cases undergo careful review; if there is suspicion of criminal conduct or serious breaches of duty, they are investigated accordingly and countermeasures taken if necessary. Whistleblowing cases are regularly reported to the Board of Managing Directors and to the Audit Committee of the Supervisory Board. These reports are prepared with due regard for confidentiality and identity protection and generally include statistics and an aggregated summary of deliverables. Reports that are intentionally false or defamatory will not be tolerated by Commerzbank and may result in personnel or legal consequences.

Overall responsibility for ensuring implementation of the policy within Commerzbank and in particular for ensuring that it is complete and up to date lies with Group Compliance. This includes both the policy itself as well as all subordinate documents such as addenda and procedures. Against this backdrop, Commerzbank's Group Compliance is responsible for the whistleblowing system of Commerzbank AG and serves as the central reporting channel for the Commerzbank Group. The local persons responsible for other locally established reporting channels are listed in the relevant addenda.

Local implementation of the provisions of the Whistleblowing Policy is decentralised; responsibility therefore lies with the responsible local compliance officer as specified in the local addenda.

The Global Whistleblowing Policy, including the local addenda and the Whistleblowing Procedures, are available for all employees as overarching instructions in Commerzbank's Global Compliance Policy Portal.

The whistleblowing system can be used to send reports to the internal reporting offices of Commerzbank AG or of the local compliance units – quickly, easily and, if desired, anonymously.

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Actions

The Global Whistleblowing Policy and the reporting system were last revised in 2024, including with regard to the EU Whistleblower Protection Directive and local EU laws; the approach applied was already in compliance with the law and thus only minor clarifications were made.

Given that both the policy and the reporting system comply with current legal requirements, no further updates are planned at the present time.

Implementation generally depends on individual measures as defined by legal requirements, although Commerzbank also implements stricter regulations across the Group in some cases. Implementation takes place at the Bank's domestic and foreign subsidiaries and branches that have been classified as material as part of an independent process.

Commerzbank has implemented the relevant safeguards in line with a risk-based approach. No further measures are currently necessary.

Key figures

Since the key figures for whistleblowing are covered together with those for consequence management, they can be found in the "Key performance indicators" section of ESRS S1-17.

Targets

Commerzbank's overarching goal is to detect and punish violations of legal and regulatory provisions, guidelines and rules. All whistleblowing reports are treated with the utmost seriousness and the allegations they contain are subject to appropriate investigation. Regular checks are carried out to ensure the incoming reports are complete; this provides a holistic overview of whether the established processes and systems are functioning as intended.

Given the zero-tolerance policy towards violations of legal and regulatory provisions, guidelines and rules, there are no concrete measurable targets.

[S1-4] Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Actions on material impacts related to own workforce

The individual actions in relation to impacts on employees are described in ESRS S1-8 to S1-17.

Procedure for defining actions

The annual Group strategy process also analyses the issues affecting the workforce and addresses topics that will be particularly relevant for human resources in the coming planning period.

These topics can range from influences exerted by the labour market environment, for example demographic change, to trends such as new forms of training and employee development.

As part of the strategy process, pertinent topics are discussed and actions are agreed, with a focus on reinforcing positive impacts on our workforce. The Bank's aim through this preventive approach is to reinforce positive impacts on employees while at the same time avoiding negative impacts. These actions are discussed with the Board of Managing Directors and the Supervisory Board, meaning that employee-representatives are also involved in the process. If the co-determination rights of the works council are affected, the works council will be involved as well. Further information can also be found in ESRS S1-2 and S1-8.

Strategy 2027 specifies improving employee satisfaction as a key area of focus. Creating good working conditions where employees feel motivated and committed in their job is an essential element of our human resources strategy.

Reporting channels such as the whistleblowing tool have been set up to avoid negative impacts on own workforce. Further information on reporting channels or opportunities for participation can be found in ESRS S1-2, S1-3, S1-8 and S1-17.

The policy statement pursuant to the Supply Chain Due Diligence Act also outlines targets and actions. These are intended to afford effective protection to affected or potentially affected parties and to identify, prevent or minimise adverse human and environmental impacts on their person.

Avoiding negative impacts

A broad spectrum of laws and regulations protect workers' rights and govern the relationship of Commerzbank as the employer to its employees.

The Bank has pledged to respect rights and comply with applicable legislation, with this commitment reflected in a large number of policies and actions (see also the disclosures in ESRS S1-8 to S1-17).

Negative impacts are avoided in particular in the following five ways:

- a well-developed social dialogue with employee representatives and strong collective bargaining agreements (see also the disclosure in ESRS S1-2 and S1-8);
- a focus on promoting diversity and inclusion and fostering a healthy work-life balance (see also the disclosure in ESRS S1-9, S1-12 and S1-15);
- our guiding principles outlined in the Code of Conduct, which apply to everyone throughout Commerzbank (see also the disclosure in ESRS S1-1 and G1-1);
- consequences that will be imposed in the event of non-compliance with the Code of Conduct (see also ESRS S1-17);
- evaluation of preventive measures and remedial action within the meaning of the Supply Chain Due Diligence Act to assess the appropriateness and effectiveness of processes and controls (see also ESRS S1 SBM-3).

Resources for managing impacts

A key goal of Strategy 2027 is to improve employee satisfaction and position Commerzbank as an attractive employer on the internal and external labour market. To meet this goal, the Bank earmarks the resources required to foster good working conditions as part of its annual financial planning

and reviews implementation of the agreed actions once every quarter to ensure that the defined targets have been achieved. This involves presenting the topics to the full Board of Managing Directors and – with Board participation – in the designated bodies and committees.

In addition to implementing the measures defined as part of Strategy 2027 Commerzbank AG has appointed a Human Rights Officer in accordance with the Supply Chain Due Diligence Act who is responsible for monitoring risk management with regard to human rights and environmental risks and reports directly to the Chief Risk Officer.

In addition to providing financial resources, organisational structures have been established in the form of departments and groups to manage the impacts described in the social standards. No concrete figure is currently available for the financial resources for managing impacts. These financial resources would include not only the budget for actions or products, but also the costs for structures, personnel and technology. No appropriate methodology currently exists that would provide a comparable and meaningful value.

IS1-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Employee satisfaction is a strategic goal and one of the three core strategic steering elements of Commerzbank AG alongside increasing customer satisfaction and financial results.

The Employee Engagement Index has been collated annually since 2024 to measure satisfaction among employees, rated in terms of the four items “work satisfaction”, “pride”, “motivation” and “willingness to recommend us as an employer”. The findings paint a reliable picture of the mood among the workforce.

The Supervisory Board and the Board of Managing Directors set themselves the goal of increasing the index value by 4% for 2024 from its starting value of 70 (as at February 2024). Our goal is to achieve and maintain a high level. If the index value is increased, this therefore influences annual target achievement for the Board of Managing Directors as well as for managers at management levels one and two, and consequently also has an impact on variable remuneration.

The follow-up measurement in November 2024 revealed an Employee Engagement Index of 75, representing an increase by 5 percentage points compared with the baseline value. These results show that we have made significant progress in terms of satisfaction and engagement among our employees.

Another goal in the context of diversity and inclusion is ESRS S1-9.

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[S1-6] Characteristics of the undertaking's employees

The following data – in ESRS S1-6, S1-8, S1-9, S1-12, S1-13, S1-15 and S1-16 – refer to the total number of employees by headcount and include permanent employees of the Commerzbank Group. Permanent employees comprise all active employees excluding trainees, employees on permanent leave and employees with a passive employment relationship. The collected data are not validated by third parties (i.e. parties outside the company).

Employees are broken down by gender, age group and country based on the information contained in the Bank's human resources systems. The data refer to the 2024 reporting year and are collected in line with the scope of consolidation outlined in the CSRD report, as per ESRS BP-1. Data are gathered and reported for all units that have an active workforce consisting of their own employees.

Key figures

As at year-end 2024, the Commerzbank Group employed a workforce of 40,233. The majority of employees work at Commerzbank AG in Germany, which had a headcount of 21,108 as at year-end 2024.

2,568 employees left the Commerzbank Group in the 2024 reporting year. This corresponds to a fluctuation rate of 6.4%.

At around 52%, just over one half of the workforce is female, while 48% of employees are male. All employees have the option of specifying their gender in the system as "Other" or "Not reported". No employee has taken advantage of this opportunity to date.

The majority of employees are employed in Germany and Poland. Approximately 63% of the Group's employees are employed in Germany and just under 27% in Poland.

In the Commerzbank Group, the majority of employees at just under 93.8% have a permanent employment contract; only 6.2% are temporary employees. There are no non-guaranteed hours employees in the Commerzbank Group. The breakdown by gender among the individual employment contract models is balanced.

Number of employees by gender

Gender	2024
Female	21,088
Male	19,145
Diverse	0
Not reported	0
Total	40,233

Number of employees by significant countries

Country	2024
Germany	25,399
Poland	10,708

Number of employees by type of contract, broken down according to gender

Headcount	2024				Total
	Female	Male	Divers	Not reported	
Number of employees	21,088	19,145	0	0	40,233
Number of permanent employees	19,449	18,279	0	0	37,728
Number of temporary employees	1,639	866	0	0	2,505
Number of non-guaranteed hours employees	-	-	-	-	-

Methods, assumptions and background information

Employee turnover consists of terminations by the employer, notices by employees, severance agreements, retirements, and exits due to employee deaths. This figure is compared to the average number of employees during the reporting period.

Fluctuation rate in %:

$$= \frac{\text{Sum of all leavers during reporting period}}{\text{Ø number of employees during reporting period}} \times 100$$

Cross-reference to the most representative number in the financial statements

The total number of employees indicated in the Sustainability Report is based on the headcount at the end of the reporting period. This figure differs from the number of employees as per the annual financial statements, which is calculated as an average over the entire reporting period. In the annual financial statements, the average as of the reporting date is calculated by adding together the period-end values within the reporting period and then dividing this total by the number of months in the reporting period.

[S1-8] Collective bargaining coverage and social dialogue

Policies

Collective bargaining policy

Our company is of the firm belief that fair and just working conditions contribute to sustainable corporate development. Collective bargaining and compliance with applicable collective bargaining agreements is a key part of this obligation. Our collective bargaining agreements govern our rights and obligations as an employer and the rights and obligations of our employees.

Not only do our collective bargaining agreements meet the minimum requirements defined by law; they exceed them by incorporating additional benefits for our employees. Through our continuous dialogue with the unions, we ensure that the needs and interests of employees are always taken into account when drafting the terms of the agreements. This promotes a social partnership based on trust – something that is crucial for the long-term growth and success of our company.

The agreements that currently apply at Commerzbank AG in Germany are the collective bargaining agreements for the private banking industry, the in-house collective agreements governing the performance of Saturday work and site guarantee

(“Standortgarantie”) for the advisory centre locations, and the in-house collective agreement on the structure of the works council.

The collective bargaining agreements for the private banking industry primarily govern general working conditions in the private banking industry, in particular salary, working hours and annual leave.

As a member of the Employers’ Association of the Private Banking Sector (Arbeitgeberverband des privaten Bankgewerbes e. V., AGV Banken), Commerzbank AG complies with its collective bargaining agreements and other social partner agreements. The AGV represents the socio-political interests of banks operated under private law throughout Germany. Commerzbank is therefore subject to a wage agreement that regulates the salaries of its pay-scale employees through the collective wage agreement for the private banking industry.

The in-house collective agreements at Commerzbank regulate working hours for Saturday work in the advisory centres and voting units and the structure of the works council.

Additional in-house collective agreements apply to the ComTS companies. These govern working conditions at the ComTS companies, in particular salary, working hours and annual leave.

Social dialogue

Social dialogue between Commerzbank AG and its employees plays a crucial role in Germany in terms of the working environment and labour relations. This dialogue is characterised by the principle of co-determination and the rights of employees, which are upheld by statutory regulations and by the institution of the works council.

All companies of Commerzbank AG in Germany as well as all German subsidiaries (of a corresponding size¹²) have works councils and these constitute an integral part of the social dialogue. The works council is an elected body that represents the interests of employees in a company.

The purpose of social dialogue and co-determination in Germany is to strike a balance between employers’ and employees’ interests. Involving the works council in decision-making processes helps to identify conflicts at an early stage, which in many cases can be resolved through negotiations and compromises.

In addition to these works councils, there is a Central Works Council at Commerzbank AG in Germany and a Group Works Council at the Commerzbank Group.

The Group Works Council is responsible for dealing with matters that affect the Group or multiple Group companies and cannot be resolved by the individual central works councils within their respective companies. Its responsibility also extends to Group companies that have not formed a central works council and to Group company entities without a works council.

¹² A works council may be elected in companies with at least five employees entitled to vote, where at least three are eligible to be elected.

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The Group Works Council is tasked with representing the interests of employees at Group level. It provides a platform to share information and experiences and has the remit to develop unified positions and strategies to effectively represent the interests of employees at Group level.

Actions

Collective bargaining policy

We consistently work in close cooperation with AGV Banken and the trade unions to further develop the collective bargaining agreements for the private banking industry. 2024 saw a further round of collective bargaining negotiations for the private banking sector with the trade unions, resulting in new amendments to the collective wage agreement.

The in-house collective agreement within Commerzbank AG governing the structure of the works councils was renegotiated in 2024. This has redefined their local jurisdictions, which will apply going forward with effect from the works council elections in 2025.

Social dialogue

The works council has various co-determination and participation rights. These are laid down in the Works Constitution Act (Betriebsverfassungsgesetz, BetrVG) and extend from rights of information and consultation, to rights of co-determination in social, personnel and economic matters. The works council has a say in decisions made by the employer that affect the workforce, such as working hours, holiday arrangements, salary structures and job security.

Regular consultations are held between Commerzbank and the works council. These joint discussions – on social issues, for example – are an important element of social dialogue

and usually include sharing information on planned operational measures. Commerzbank is required to provide the works council with prompt and detailed notification of all planned measures that could have an impact on employees. These include, for example, planned restructuring, changes in the way work is organised or the introduction of new technologies. In many cases, the employer must obtain consent from the works council before implementing a measure. This serves to protect employees and ensures that their interests are taken into account in pending operational decisions.

Agreement on representation by a works council

In line with the EC Directive¹³, a Group works agreement has been concluded governing the establishment of a procedure in Community-scale undertakings and Community-scale groups of undertakings for the purposes of informing and consulting employees, and

the implementation of this agreement in the Federal Republic of Germany. Accordingly, it has been agreed that companies belonging to the Group with at least 150 employees in a member state of the European Union will each send one representative to the Group Works Council. If Commerzbank AG has a total of at least 150 employees in a member state of the European Union, these groups of employees may also send a representative in accordance with the preceding regulation. This is intended to ensure that employees are informed and consulted across national borders in accordance with the Directive.

At Commerzbank, works agreements play a central role in the social dialogue between the Bank and its employees. They are an important instrument of co-determination and constitute a binding agreement between Commerzbank and the works council.

A large number of works agreements are in place at Commerzbank addressing a variety of social issues and employment relationship topics.

Works agreements are an essential part of the social dialogue at Commerzbank. They enable detailed and targeted regulation of working conditions in the company and strengthen employee participation. Works agreements not only ensure compliance with legal requirements and collective bargaining provisions, but also promote constructive and cooperative collaboration between employer and workforce.

Key figures

In the Commerzbank Group as a whole, 25.3% of the total workforce are covered by a collective bargaining agreement.

In Germany, 38.3% of employees work under a collective bargaining agreement. The working and employment conditions of non-pay-scale employees (i.e. employees who are not covered by a collective bargaining agreement) are at least equivalent to the collective bargaining conditions as a whole.

No collective bargaining committee has been formed at the Polish sites¹⁴ to date, meaning there is no collective bargaining provision.

In Poland, 91.4% of employees have employee representation at the workplace. In Germany, this figure is 96.4%.

¹³EC = European Community; these are directives of the European Union.

¹⁴Poland is highlighted alongside Germany because the majority of employees work in these two countries.

Collective bargaining coverage and social dialogue

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees – EEA	Employees – Non-EEA countries	Representation at the workplace (EEA only)
0-19%	Poland		
20-39%	Germany		
40-59%			
60-79%			
80-100%			Poland
			Germany

Targets

In the area of “Collective bargaining coverage and social dialogue”, there are currently no targets within the meaning of the ESRS.

Our goal is to continue to offer our employees fair and attractive working conditions in the future through close collaboration with the unions and employee representatives, and in this way make a contribution to social sustainability. It is therefore established practice to hold regular meetings to discuss ongoing changes in the workplace, both at the collective bargaining level and at the operational level. Joint decisions are made and implemented by amending existing provisions or enacting new provisions in agreement between employer and employee representatives.

[S1-9] Diversity

Having a diverse working environment makes a significant contribution to underpinning the long-term success of our company and increasing innovation and productivity. This is one of the reasons why diversity and inclusion are anchored firmly in the Group and sustainability strategy.

We are committed to this positioning and demonstrate our support both internally and externally, as reflected by Commerzbank’s various engagements and memberships outside its own Group structure. We are a member of the Diversity Charter, member of UnternehmensForum e.V. (company association advocating for people with disabilities), signatory to the UN Womens’ Empowerment Principles, and co-founder and advisory board member of the Prout@Work Foundation.

Our commitment to diversity and inclusion is also an integral part of our corporate DNA and has been anchored in our company structure for many years, including through a governance body featuring representatives from all areas of Commerzbank. The central

committee for strategic alignment is the Global Diversity Council (GDC), which is chaired by the Board Member for Human Resources. Thanks to the active involvement of all business units and the Human Rights Officer, coupled with the support received from the Regional Diversity Council (RDC), we are able to incorporate and implement country-specific differences and demands as well as the accompanying targets and actions for diversity and inclusion across all areas of the Group. In doing so, we ensure that diversity is a matter of course in all considerations and divisions Group-wide.

Policies

Studies show that teams made up of a diverse mix of people perform better and play a crucial role in a company’s success, particularly with a view to internationalisation, demographic change and the shortage of skilled workers. Creating a culture of belonging and boosting diversity among teams also fuels innovation and creates an incentive to share different perspectives and experiences – not to mention providing an increased sense of psychological security.

The Bank has adopted Diversity & Inclusion Standards for this purpose. These standards, which are reviewed on a regular basis and updated as necessary, form the basis for the company’s understanding of diversity within the framework of the “Global Functional Lead” for Human Resources.

A central tenet of these standards is to incorporate the individuality of customers, employees and stakeholders into business processes through positive consideration, appreciation and cooperative behaviour and to accommodate their specific needs.

Though its long-standing diversity management, Commerzbank also strives to strike a balance between Group-wide strategies, targets and actions, on the one hand, and division- or region-specific strategies, targets and actions, on the other. Collaboration with segment-specific initiatives and Regional Diversity Councils (RDCs) is essential in order to set the right the strategic focus for diversity issues and anchor them accordingly in the corporate structure.

Actions

By promoting joint-leadership policies, flanked for example by our female recruiting guidelines and other support offerings such as targeted training and coaching, Commerzbank is committed to promoting gender equality at all management levels and in all teams worldwide.

A wide range of actions and training courses aimed at building knowledge and raising awareness, coupled with dedicated learning pathways on diversity topics, provide our employees with various opportunities to educate and empower themselves across all diversity dimensions.

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These strategies have met with success, as attested by our repeated second-place ranking out of the top 100 listed companies in the Boston Consulting Group's Gender Diversity Index 2024. This index takes into account not only the proportion of female managers on executive boards and supervisory boards, but also the difference in average pay between male and female employees. Scoring 86.3 out of 100 points in 2024 (with an index average of 58.9), Commerzbank recorded a further improvement on previous years, proving that we take our responsibility seriously to promote equal opportunities and implement actions that have a tangible impact on our workforce.

Furthermore, Commerzbank received its tenth TOTAL E-QUALITY award for equal opportunities in November 2024. This annual award honours organisations that take it upon themselves to systematically enshrine equal opportunities in their personnel and organisational policies for the long term. Our exemplary diversity management was also recognised with the Add-ON Diversity award,

which is given to companies that demonstrate their commitment to employee diversity in addition to gender equality.

Key figures

The proportion of employees between 30 and 50 years of age exceeds 50%. The other age groups are distributed as follows: almost 35% of employees are over 50 years old, and nearly 13% are under 30 years old.

The top management levels of the Commerzbank Group are comprised of the first and second levels with disciplinary responsibility subordinate to the Board of Managing Directors. The top management levels of Commerzbank are occupied by 87 women and 308 men. Expressed as a percent, 22% are women and 78% are men.

Distribution of employees by age group

	2024
< 30 years old	5,199
Share of employees < 30 years old	12.9%
30 to 50 years old	21,740
Share of employees 30 to 50 years old	54.0%
> 50 years old	13,294
Share of employees > 50 years old	33.0%

Gender distribution at the top management levels, expressed as a number and as a percentage

	2024
Female	87
Share of total at top management levels	22.0%
Male	308
Share of total at top management levels	78.0%
Diverse	0
Share of total at top management levels	0.0%
Not reported	0
Share of total at top management levels	0.0%
Total	395

Targets

The proportion of female managers across all management levels is currently around 37%, compared with their percentage in the total workforce of 52%. Since 2021 Commerzbank has been pursuing the goal of filling 40% of management positions with women over the long term by end-2030. The Global Diversity Council (GDC) continuously monitors and evaluates whether these targets are being achieved or need to be redefined.

In addition to maintaining equal representation on the Supervisory Board and the Board of Managing Directors, Commerzbank is committed to achieving a share of at least 25% women in the first and second management levels below the Management Board by the end of 2026.

[S1-10] Adequate wages

Commerzbank is committed to fair and living wages for all employees, in line with the principle of equal pay for equal work. This includes, in particular, adequate and on-time remuneration that enables employees to sustain their livelihoods and safeguard their existence. Comprehensive remuneration regulations within the framework of compensation guidelines or collective bargaining agreements are complied with and ensure that the wages paid are adequate.

A comprehensive quantitative analysis was applied to ensure that the remuneration of all employees meets the criteria for an adequate standard of living. This was done by comparing the lowest wage paid for each country with the applicable reference values and relevant national and international standards.

That helps us to ensure that the remuneration received is at least equivalent to the statutory minimum wage of the country in question, or is no less than the minimum wage guaranteed by law or the minimum standards stipulated by the respective economic sector.

Commerzbank AG in Germany is subject to a wage agreement by virtue of the fact that the salaries of its pay-scale employees are governed by the collective wage agreement for the private banking industry. The salaries of the lowest-paid employees are also significantly higher than the statutory minimum wage. The working and employment conditions of non-pay-scale employees (i.e. employees who are not covered by a collective bargaining agreement) are at least equivalent to the collective bargaining conditions as a whole.

[S1-12] Persons with disabilities

The inclusion of people with disabilities is not only a social responsibility; it is also an integral component of the Bank's diversity strategy and an expression of Commerzbank's broader position and attitude. Commerzbank is guided by legal requirements and for many years has met the statutory quota for the employment of persons with disabilities pursuant to Volume IX of the German Social Code (Sozialgesetzbuch, SGB). This is just one of the ways Commerzbank actively counteracts the potentially discriminatory treatment of people with disabilities.

Policies

Commerzbank was the first bank in Germany to take the step of making a voluntary public commitment with its inclusion action plan 1.0 "Gemeinsam verschieden" (Different together), which was published on the basis of the United Nations Convention on the Rights of Persons with Disabilities (UN-CRPD).

Commerzbank took the next step in 2023 when it revised and updated the original policy, resulting in the publication the inclusion action plan 2.0 "Nachhaltig inklusiv" (Sustainably inclusive). In this second iteration, Commerzbank has broadened the focus of the underlying policy and linked inclusion even more closely with its commitment to diversity and sustainability. Under the motto "Sustainably inclusive", the Bank is removing even more barriers as it seeks to change the framework conditions for persons with disabilities in the economy, improve access to the labour market and make products barrier-free for its customers.

The agreements on inclusion apply at Commerzbank AG in Germany to all severely disabled employees and employees with equivalent status within the meaning of § 2 SGB IX. Commerzbank oversees implementation in close collaboration with interest groups such as the representative body for disabled employees (Schwerbehindertenvertretung, SBV).

Actions

The aim of expanding the inclusion action plan is two-fold: firstly, to take existing actions into account; and secondly, to develop these further in accordance with the UN Convention on the Rights of Persons with Disabilities. The progress that has been made since the first inclusion plan was introduced in 2018 until today is testament to Commerzbank's ongoing efforts to improve inclusion in the workplace, not only in structural terms, but in human terms as well. A wide range of actions are used to raise awareness and increase employees' consciousness of the issues facing persons with disabilities,

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and highlight the important role these and other people affected by health restrictions play in the success of our company.

Priority is given to seven fields of action that include continuously incorporating inclusion into our corporate culture, promoting preventive healthcare, identifying needs and designing products from the customers' perspective.

The seven fields of action defined for inclusion action plan 2.0 "Sustainably inclusive" are monitored and reviewed on an ongoing basis. Alongside raising awareness and public relations, these include topics such as training and further education, workplace design, prevention and structural parameters, as well as Commerzbank's social commitment.

With regard to the German Accessibility Act (Barrierefreiheitsstärkungsgesetz, BFSG) that came into force in 2021, Commerzbank will enable the barrier-free use of mobile apps, online banking and self-service devices such as ATMs and banking terminals by 2025. In addition, two out of three branches offer barrier-free access, with this offering due to be expanded even further in future. Further information pertaining to the BFSG can be found in the company-specific disclosure ESD 10 and 11 "Access to banking products for people with physical and cognitive impairments".

Commerzbank's work with regard to the inclusion of people with disabilities was recognised in 2024 with the Inclusion Award for Business 2024 in the "Large Companies and Corporations" category. The award recognises groundbreaking inclusion projects in the workplace and is testament to the effectiveness of the inclusion measures introduced by Commerzbank.

Key figures

The proportion of persons with disabilities in the Commerzbank Group is 3.8%. Commerzbank AG in Germany has long exceeded the statutory target ratio of 5% set for Germany, where the proportion of persons with disabilities was 5.5% in 2024.

Methods, assumptions and background information

Persons with disabilities include both employees with severe disabilities and employees with equivalent status.

The numbers relating to persons with disabilities offer a Group-wide perspective, with the exception of the USA due to legal restrictions.

Targets

In the area of "Inclusion", there are currently no targets within the meaning of the ESRS.

We have established processes and assessment mechanisms to ensure the effectiveness and efficacy of the inclusion-related actions and policies introduced. The actions are adapted to the individual needs of persons with disabilities and are adjusted or developed using a participatory approach. We compare our offerings with industry standards and trends to ensure that they meet current requirements and provide a high level of quality.

IS1-13] Training and skills development metrics

Commerzbank offers a comprehensive range of training and development opportunities for employees. The learning opportunities and actions in the area of skills development should be developed and adapted to current trends and requirements on an ongoing basis. This is crucial to ensuring their positive impact and avoiding potentially negative effects, while a continuous process of optimisation maintains effectiveness and mitigates negative impacts. Established policies and targeted actions ensure that potential risks are minimised while learning and development targets are supported over the long term. Training and further education are accorded high priority at Commerzbank. Not only do training and development opportunities enhance the way the Bank is perceived among potential applicants on the job market, they also contribute directly to the skills of its workforce – which has a positive impact on the Bank's success.

Policies

Training

Learning and further training are fundamental components for the success of Commerzbank AG and at the same time ensure the employability of its workforce and compliance with regulatory requirements. Employees are encouraged to play a more active role in shaping their professional and personal development and to work with their manager to take control of their own career journey.

Precisely how the various formats are set up and implemented is governed by individual works agreements. These works agreements were concluded in tandem with employee representatives. The HR department is responsible for implementation.

Changes in the analogue and digital world of work are having an impact on the content being taught and how it is taught. Two key emerging trends are knowledge management and fast, barrier-free access to interest-driven content. To continuously develop workers' skills and equip them for the changes brought about by digitalisation, Commerzbank offers both optional and mandatory training modules such as seminars, workshops and e-learning courses. Compulsory and standard qualifications have also been expanded to include a third pillar: self-guided, interest-based digital learning. The cliX learning experience platform has established itself as the central point of access for learning.

Learning platforms allow us to bundle all our offerings in one place and enable lifelong, career-driven learning.

Personnel development

Personnel development at Commerzbank helps employees and managers successfully complete tasks and achieve business objectives through appropriate measures. In addition to promoting employability and ensuring the company's long-term success, personnel development is intended as a means of boosting both employee motivation and retention. Employees will only remain with the Bank in the long term if they are given opportunities to grow and develop as a person and discover new professional opportunities.

Managers play an important role in personnel development. As human resources facilitators, they are responsible for developing and expanding the competencies and skills their employees need so that they can successfully complete current and future tasks. They must assess the requirements as well as employees' existing competencies and skills, hold development discussions with employees, provide feedback, and incorporate development and learning into work processes.

Commerzbank's HR department helps its managers foster their employees' personal development and provides online-supported processes and formats to ensure that this development is uniform, structured and efficient.

A special role is played by the Bank's personnel development process, which comprises the development dialogue as well as the key competencies addressed therein. The six key competencies define the requirements for employees and managers; they also serve as development guardrails and are therefore an important aspect of other human resources instruments.

The key competencies at Commerzbank are:

- Client first
- Take responsibility
- Simplify
- Work together
- Take care
- Change it

The development dialogue is a process that supports the targeted and ongoing development of all employees, not only in terms of the key competencies but also as a means of expanding and refining required skills. It focuses on structured discussions held by managers with their employees as well as systematic planning of learning and qualification measures for targeted development. The aim, content and process of the development dialogue have been regulated in a central works agreement since 2019.

Actions

Training

With "Lernzeit+" (Learning Time+), Commerzbank provides all employees at Commerzbank AG in Germany with an optional, freely available working time quota for personal and professional development. "Lernzeit+" offers self-guided, interest-based and digital learning. This extended learning offering makes a valuable contribution to establishing a modern learning culture while simultaneously taking employees' interests into account. It also boosts Commerzbank's competitiveness by enhancing its attractiveness as an employer.

It is our conviction that we can manage and sustain change over time if we promote the skills and competencies of our employees. We are therefore investing in additional training measures to equip our employees with the specific skills and competencies needed in the digital environment. This will enable us to safeguard the employability of our workforce as part of the digital transformation while also securing the future of our Bank at the same time. The Bank provides support in the form of qualification for a new functional activity, known as reskilling, and by promoting digital skills in an existing functional activity, referred to as on-the-job or upskilling. These learning paths focus on interdisciplinary future skills, meaning that they help employees acquire the qualifications they need for the ever-changing digital workplace. The reskilling journey takes a total of 12 months and culminates in qualification as a business expert. Upskilling comprises a total of 120 teaching units per participant. The programmes are certified and offered by external partners.

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In addition to the voluntary basic qualification on the topic of sustainability, an advanced qualification has been introduced for all employees of Commerzbank AG in Germany. This advanced 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.

In order to enhance and expand employees' language skills within the company and in customer contact, we offer all "Speexx Smart4All" on the basis of the existing "Professional further education and training" works agreement. The online language course provides a fun and interactive way for employees to improve and expand their language skills and is currently available in five languages: English, German, Spanish, French and Italian.

Personnel development

Personnel development includes assessing existing and required competencies and skills, holding regular development discussions with employees, identifying talents and selecting suitable development offerings. We support these requirements with various programmes including:

- Development dialogue: Structured and regular dialogue on individual development with the option of documenting the agreements made in an online form.
- Potential discussion: Managers hold potential discussions with their talents to support their progression into new tasks and roles.
- Performance appraisals Line managers prepare a performance appraisal once a year at the request of employees. Six

performance criteria are evaluated using an online form and the resulting assessments are discussed with the employees.

Key figures

93.0% of employees took part in regular development programmes in 2024. Regular is understood to mean at least once a year. The development programmes can take the form of performance appraisals or career development programmes and are subject to mutual consent by the employee and manager.

In 2024, each employee completed an average of 21.3 hours of training. The training hours include compulsory training and standard qualifications as well as self-guided and interest-based learning.

Targets

In the area of "Training and skills development", there are currently no targets within the meaning of the ESRS.

We have established processes and assessment mechanisms to ensure the effectiveness and efficacy of the training and skills development actions and policies introduced. These include the number of employees participating in the various courses and participant satisfaction with the programmes. We compare our offerings with industry standards and trends to ensure that they meet current requirements and provide a high level of quality.

Key figures for training and skills development

	2024				Total
	Female	Male	Diverse	Not reported	
% of employees that participated in regular performance and career development reviews ¹	92.7%	93.3%	0.0%	0.0%	93.0%
Ø number of training hours per employee	21.1	21.6	0.0	0.0	21.3

¹ This key figure refers to the scope of consolidation of this Group Sustainability Report (BP-1) with the exception of mBank S.A.

[S1-14] Health and safety metrics

Policies

Health is the basis for a properly functioning organisation and work-force alike. That makes health management a key element of the HR activities at Commerzbank AG. We want to empower employees and managers to deal with the ongoing changes taking place in the world of work both autonomously and in a way that is beneficial to their health.

Commerzbank is committed to the physical and mental health and well-being of its employees and implements a wide range of measures that contribute to a healthy and safe working environment. We place a particular emphasis on promoting and supporting issues related to our employees' mental health. Although there are no dedicated strategies or policies to promote mental health, this topic is nevertheless an important part of Commerzbank AG's health management. Applying a holistic approach that encompasses preventive measures, situational help as well as aftercare. The time horizons of the associated actions depend on the needs of the individual in a specific situation. Actions are described in the relevant works agreements, which were concluded in collaboration with the works council. Employees and managers are responsible for implementing the works agreements.

Actions

Employees have access to professional counselling services and psychological support through an Employee Assistance Programme (EAP). Our external experts from the Fürstenberg Institute provide confidential advice and information through various digital offerings and work together with employees to find solutions. This free, on-the-spot service is available to all employees throughout Commerzbank AG – 24 hours a day, 365 days a year. The offering is intended to improve general well-being and promotes long-term employability.

Other health offerings for our employees include traditional in-person appointments as well as webinars, audio formats and video consultations with company doctors and with Employee Assistance Programme advisors. In 2024, as part of "Mental Health Week", we offered our employees various virtual formats on mental health in both German and English. In keeping with the concept of inclusion, one format was conducted exclusively in sign language.

Our employees also have access to a comprehensive network of support services, including counselling and peer support groups. The "Horizont" network for employees of Commerzbank AG in Germany repositioned itself in 2024 and since then has functioned not only as a network for people affected by burnout, but for all topics related to mental health. In addition, the "Horizont" network sees itself as a touchpoint for all, no matter what their concern, and offers assistance with self-help. For example, it helps connect employees with professional help and offers a safe space to talk in confidence.

Commerzbank AG in Germany features an addiction support network that provides support for people suffering from addiction, run by employees for employees. Here as well, the network and its members play an important role in connecting employees with professional help and offering a safe space to talk in confidence.

As part of Commerzbank's human rights and environmental due diligence obligations under the Supply Chain Due Diligence Act, actions are also specified relating to health and safety.

Targets

In the area of "Mental health", there are currently no targets within the meaning of the ESRS. Due to the sensitive nature and confidentiality of health-related data, these data are neither measured nor set as targets.

We have established processes and assessment mechanisms to ensure the effectiveness and efficacy of the actions and policies introduced in the area of mental health. These include the number of employees participating in the various courses and participant satisfaction with the programmes. We compare our offerings with industry standards and trends to ensure that they meet current requirements and provide a high level of quality.

[S1-15] Work-life balance metrics

For Commerzbank, work-life balance is an important aspect of its sustainability and diversity strategy. We actively support our employees in reconciling their private and family obligations at home with their work obligations at the Bank.

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Policies

Commerzbank AG in Germany has anchored various policies in its works agreements aimed at fostering a better work-life balance. One of these is the “Keep in touch” policy, which enables people to return to work after parental leave in various part-time arrangements. This gives parents the opportunity to keep in touch with the company and their colleagues during their parental leave, while also facilitating the exchange of information and access to relevant training opportunities. In this way, Commerzbank helps to avoid a rupture between family and career. In addition, the “Return guarantee” works agreement provides planning security for those who take parental leave. To make it easier for employees to reconcile their caregiving and work commitments, Commerzbank has introduced two corresponding works agreements “Compatibility of caregiving and work” and “New caregiving modules”, which offer effective support for persons who are responsible for caring for others at home.

We regularly review the various policies, offerings and actions relating to the options for family-related leave, particularly in respect of regional specifications and circumstances.

Actions

Commerzbank promotes a wide range of actions to help people who are entitled to family-related leave strike an appropriate balance between their work and private lives.

We have been expanding our activities on a continual basis for more than 30 years and provide targeted offerings for our employees, many of which are laid down in works agreements of Commerzbank AG in Germany. An important aspect for us is making sure parents get the support they need in their home lives, be this through various offerings as part of our pme Familienservice (such as childcare, emergency care or holiday options) or through our “Keep in touch” programme.

A high degree of flexibility in terms of both time and place is crucial to implementing the changes happening in the company’s workplaces. To make it easier to reconcile family and career, Commerzbank offers its employees various part-time models and other work arrangements, for example the option to try working part-time on a temporary basis or job sharing, where two part-time employees share one position.

We are committed to continuously improving the actions we take for our workforce. One essential part of this is regularly reviewing

and updating the various activities aimed at fostering a better work-life balance. Regular reviews help us to realign the various offerings – such as the pme Familienservice, holiday care and “Keep in touch” – to the evolving needs of our employees. This involves evaluating the number of times the offerings have been used and by whom, and also taking into account the changing framework conditions and corresponding adjustments made to the offering. 2024 saw Commerzbank certified once more as part of the “Work and Family Audit”.

Key figures

The vast majority of Commerzbank employees are generally entitled to family-related leave (98.7%). This figure includes all employees who are entitled to family-related leave in accordance with legal or internal company regulations. Family-related leave encompasses leave prescribed by law or internal company regulations for family obligations.

Entitlement to family-related leave means that, in accordance with national law or internal company regulations, female employees are entitled to maternity leave, parental leave and care leave, while male employees are entitled to paternity leave, parental leave and care leave. Those locations with the largest share of employees offer an especially wide range of options for family-related leave. This option to take family-related leave was utilised by 16.1% of those who were entitled to it in 2024.

Targets

The overarching target in the area of “Work-life balance metrics” is two-fold: to strengthen the employer’s attractiveness and to support a positive working environment and ensure equal opportunities. There are otherwise no current targets within the meaning of the ESRS since until now the targets within the meaning of the ESRS were not relevant.

We have established processes and evaluation mechanisms to ensure the effectiveness and efficacy of the actions and policies introduced in the area of work-life balance. These include the number of employees participating in the various courses and participant satisfaction with the programmes. We compare our offerings with industry standards and trends to ensure that they meet current requirements and provide a high level of quality.

Eligible employees who took family-related leave

Gender in %	2024
Female	10.3%
Male	5.8%
Diverse	0.0%
Not reported	0.0%
Total	16.1%

[S1-16] Remuneration metrics

Gender-neutral remuneration for our employees is a top priority for us. Accordingly, all the Bank’s remuneration components and other benefits are designed to be gender-neutral and transparent.

Policies

Adequate and equal pay for equal work regardless of gender is one of the fundamental principles of our remuneration strategy. This is reviewed annually and as required, and implemented subject to approval by the Board of Managing Directors of Commerzbank AG and the managing directors of the companies of the Commerzbank Group. The remuneration strategy generally applies Group-wide.

All pay structures are systematically designed to be gender-neutral in line with the principles of our remuneration strategy. These include salary bands, collective bargaining regulations on variable remuneration for pay-scale and non-pay-scale employees, and the job evaluation procedure.

In addition, the Bank reviews all of its remuneration structures on an annual basis to ensure that its remuneration policy is gender-neutral over the long term.

The job evaluation procedure also ensures that all non-pay-scale activities for women and men are based on identical, gender-neutral criteria and are assessed independently. We offer a remuneration package consisting of market-based basic salaries, performance-related variable components and numerous other fringe benefits.

As a result of the increased significance arising from greater regulation, the remuneration systems and aggregated remuneration data for the workforce below the level of the Board of Managing Directors are disclosed in a separate report. This remuneration report pursuant to Art. 16 of the Remuneration Regulation for Institutions (Institutsvergütungsverordnung, InstitutsVergV) is published annually on the Commerzbank website.

In the area of collective bargaining, the general collective bargaining agreement for the private banking sector applies. On the basis of the collective bargaining agreement, deviating remuneration is therefore only granted for different job profiles (pay scale

groups) and for different professional experience (classification of years of professional experience), and not on the basis of gender.

Information on all remuneration systems and the remuneration strategy is accessible electronically to all employees of Commerzbank AG without discrimination.

Actions

The report on equal opportunities and equal pay sets out the ways and extent to which Commerzbank promotes the equal standing of women in qualified positions, and equal remuneration for women and men for the same or equivalent work. It is published on the Bank’s website.

Examples of this include actions to improve work-life balance, which are intended to make it easier for women in particular to pursue new career opportunities, as well as other initiatives that specifically support the career development of women (see ESRS S1-9 and S1-15). In addition, the Bank supports all employees in their work-life balance through flexible working hours. These and other actions help to gradually minimise the structural social causes of the gender pay gap. Moreover, Commerzbank regularly reviews additional measures to protect employees from gender pay discrimination and to promote women.

In this context, the Bank has adopted the requirements of the German Transparency in Wage Structures Act (Entgelttransparenzgesetz, EntgTranspG) and implemented a low-threshold process for requesting information in accordance with Art. 10 EntgTranspG. This ensures that requests based on EntgTranspG can be processed with the minimum level of bureaucracy and the highest level of confidentiality. All necessary information and background data are easily accessible to Commerzbank employees in Germany via internal electronic information channels. Employees make active use of this right to information.

To further increase the transparency of remuneration structures in anticipation of implementation of the EU Pay Transparency Directive, the Bank is preparing to analyse the salary structures of groups of employees with the same or equivalent activities, and to analyse any resulting pay gaps for these groups. The findings will then be published internally.

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Key figures

In the Commerzbank Group, the difference between the average gross hourly wage of male and female employees is 30.5%.

The unadjusted gender pay gap determined in this way represents the difference between the average income of female and male employees, expressed as a percentage of the average income of male employees. The analysis was based on the remuneration data of full-time equivalents. The average income that was used as a basis for comparison consists of the basic salary, variable remuneration and non-cash contributions.

The unadjusted gender pay gap does not take into account discrepancies by virtue of function, management level or place of work (structural causes).

When interpreting the gender pay gap, it is important to remember that this value is often due to a variety of factors, including regional or country-specific differences. Differing regional economic structures influence the gender pay gap across national borders, as they do gender-specific pay disadvantages. Commerzbank is no exception here. The structural difference in career choices between female and male employees also has a major bearing on the gender pay gap at Commerzbank.

At Commerzbank AG in Germany, the unadjusted gender pay gap is 21.1%. This is below the figure for the financial sector in Germany, which for purposes of comparison was 26% in 2023 (source: Federal Statistical Office of Germany).

Because of this, it is not possible to directly derive actions for reducing the gender pay gap from this purely statistical data. The unadjusted gender pay gap has limited significance as it does not take into account differences in qualifications, field of activity or professional experience, or the different wage levels that apply in the various economic areas where the Bank employs staff. Consequently, the unadjusted gender pay gap can only serve as an indicator that points to possible inequalities without revealing any concrete causes or tangible solutions.

In 2024, former CEO Manfred Knof was the highest paid person in the company. His total remuneration includes three main components: basic salary, variable remuneration and other fringe benefits. The annual total remuneration of the highest paid person is 50.8 times the median employee remuneration.

Methods, assumptions and background information

The gender pay gap is calculated on the basis of the average gross hourly wage. However, since Commerzbank AG pays a contractually agreed fixed annual salary rather than a gross hourly wage, the gross hourly wage must be calculated. This is done by dividing the combined sum of annual salary and relevant allowances by the target annual working hours. The average gross hourly wage consists of three main components: basic salary, variable remuneration and other fringe benefits. The gender pay gap is calculated on the basis of the calculated gross average salaries for all male and female employees in the company. Salaries of part-time employees are extrapolated to a full-time position. If employees joined or left the company during the reporting period, these salaries are extrapolated to the full reporting period. The uniform conversion of salaries into euros (currency of account) is performed according to the exchange rates provided by the finance department on the agreed date.

Targets

In the area of "Remuneration", there are currently no targets within the meaning of the ESRS.

The Bank has not set a quantitative target with regard to the gender pay gap at the present time. Since the unadjusted gender pay gap has largely structural causes, it is not an appropriate control instrument for identifying and reducing gender-specific pay disadvantages in relation to equal or equivalent activities.

Within the context of implementation of the Pay Transparency Directive or pending amendment to the Transparency in Wage Structures Act, the Bank therefore plans to perform an assessment of the current situation for groups of employees with the same or equivalent activities. This adjusted gender pay gap is more suitable for identifying differences in earnings that can be primarily attributed to gender despite the same or equivalent activities. Depending on the results of this assessment, the Bank will consider meaningful targets for the adjusted gender pay gap.

[S1-17] Incidents, complaints and severe human rights impacts

Consequence management and whistleblowing are two key measures related to discrimination, including harassment and complaints. Consequence management is described below. Further information on Commerzbank's whistleblowing system can be found in ESRS S1-3 in the section "Processes to remediate negative impacts and channels for own workforce to raise concerns".

Policies

The aim of the Consequence Management Policy is to provide managers with certainty in dealing with identified misconduct when this implies need for action in terms of disciplinary measures and carries reporting obligations. The policy provides transparency regarding the process for handling misconduct as well as the tasks of the units involved at Commerzbank. The Bank's aim is to motivate employees as part of an open and constructive error culture in order to address mistakes frankly and to be able to learn from these mistakes as a team and avoid recurrence. The consequence management framework gives Commerzbank employees the certainty that a uniform approach will be used for incidents with similar circumstances, although each individual case must always be considered from a labour law perspective. As part of this "culture of integrity", management must take self-reporting (i.e. independently acknowledging one's own misconduct) into account when deciding disciplinary action.

By establishing a uniform reporting process, a decision board for homogeneous arbitration and an evidence board as a "central memory", Commerzbank strengthens its "culture of integrity" while promoting transparency regarding and therefore the comparability of consequences in cases of misconduct.

The anonymous depiction of this (with personal data removed) in the evidence board lets misconduct be evaluated on the basis of the action decided and facilitates the identification of areas where rules and instructions need to be optimised.

Overall responsibility for ensuring implementation of the Consequence Management Policy within Commerzbank – in particular that it is complete and up to date – lies with Human Resources. The policy applies to all managers and employees of Commerzbank.

The first version of the policy was adopted by the full Board of Managing Directors of Commerzbank in 2018. Responsibility for making further amendments over time (owing, for example, to procedural changes) has been delegated to the Chair of the Decision Board, which also approves such amendments.

The global Consequence Management Policy, including the local addenda, is accessible for all employees as overarching instructions in Commerzbank's global Compliance Policy Portal.

Actions

Deliberate violations of laws, directives and codes of conduct will not be tolerated. A whistleblowing system was introduced in the Bank for this purpose in 2009. Employees can use the system to submit reports, either anonymously or by name. A consequence management system was also established in 2018 that bundles and analyses information on misconduct-related incidents. Regular reporting enables the responsible units to make informed decisions.

2016 saw the launch of the "Culture of integrity" initiative. An integral part of this initiative was consequence management, which was communicated to the workforce in 2018 and 2019 and made transparent throughout the organisation using various media; it has since become an integral part of corporate and leadership culture. Consequence management reporting was reviewed in 2024 and supplemented with a wide range of selection fields.

An online training course on consequence management is available for managers on the Commerzbank learning platform. Employees also have the option of assigning this training to themselves if they want to expand their knowledge on the topic. Parallel to this, new managers in particular receive consequence management training during an information session conducted by the HR consulting units with the help of the management toolbox. The management toolbox is likewise available to all existing managers and is communicated in various training formats.

Key figures

Commerzbank learns about incidents of discrimination and complaints related to discrimination through reports from the whistleblowing system. Alongside this, incidents that have led to disciplinary measures can also be reported within the framework of the consequence management system. These are identified as "Incidents of discrimination" in the table below.

Other confirmed whistleblowing cases that do not fall under the topic of discrimination, where the whistleblower is an employee or may be an employee if the case is submitted anonymously and which are directed against Commerzbank or an employee, are reported in the table below as "Number of complaints".

In addition, the table below indicates the number of complaints submitted to the OECD National Contact Points for multinational enterprises as "Number of OECD complaints submitted to National Contact Points". The OECD database provides an overview of all processed complaints lodged against affected companies at all National Contact Points worldwide. As part of the disclosure process,

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the OECD database is checked for possible published reports on Commerzbank under the assumption that complaints received have been fully recorded and published in the OECD database.

Data on significant fines and compensation payments related to incidents of discrimination, including harassment, are collected via Commerzbank's OpRisk loss database. This database records, among other things, losses resulting from incidents of discrimination (including harassment) with damages exceeding €10,000. The key figure "Total amount of fines, penalties and compensation for damages" reported in the table is an aggregate value of losses recorded throughout the Group in this context.

During the reporting period, a total of nine cases of discrimination were reported at Commerzbank, seven of which related to cases at Commerzbank AG, and two at subsidiaries.

There were a total of two confirmed whistleblowing cases during the reporting period that extended beyond the topic of discrimination, i.e. where the whistleblower is an employee or may be an employee if the case is submitted anonymously and which is directed

against the Bank or an employee. Neither of these cases concerned Commerzbank AG; both cases concerned subsidiaries.

No complaints were submitted through the OECD National Contact Points for multinational enterprises in the period under review, neither were any significant fines or compensation for damages paid in connection with incidents of discrimination (including harassment).

Significant fines and compensation for damages, if any, are shown in the annual financial statements under the item "Other provisions".

Collection of the key figures described above was validated by the external unit responsible for quality assurance.

Targets

The provisions of ESRS S1-3 apply here accordingly.

Incidents of discrimination and complaints

	2024
Total number of incidents of discrimination, including harassment reported in the reporting period	9
Total number of further complaints about the working environment filed through channels available for people in the undertaking's own workforce in order to raise concerns	2
Where applicable: Number of complaints filed to the National Contact Points for OECD Multinational Enterprises	0
Total amount of fines, penalties and compensation for damages for the issues and incidents	0

[S4-1] Policies related to consumers and end-users

Commerzbank's success as a company hinges on satisfied and active customers who conduct their personal banking business with us via various channels. Our corporate values are the guiding principles for Commerzbank:

- Integrity is the foundation of our business model: We are attentive, trustworthy and reliable.
- Performance is our engine: We are courageous, ambitious and enthusiastic.
- Responsibility is our mission: We act sustainably, purposefully and entrepreneurially and stand up for one another.

The corporate values are also an essential element of our risk culture, which guides our decisions on how to manage risks responsibly. This affects both what business we do and who we do this business with.

Our 2024 position on human rights is an essential element of the social responsibility we practise in our customer business. We are committed to respecting human rights as defined by the Universal Declaration of Human Rights of the United Nations (UN) and have been a signatory of the UN Global Compact since as far back as 2006. We also pledge to uphold and promote these initiatives within our scope of influence in our business with private customers.

They apply to all customer groups; our strategies, policies and actions to strengthen accessibility also apply to customers with physical or cognitive disabilities.

Our activities support material positive impacts and opportunities and mitigate negative impacts and risks for consumers in that we are in direct contact with our customers throughout the process of providing our services, or we give them corresponding options for contacting us. The member of the Board of Managing Directors responsible for Private and Small-Business Customers, supported by their heads of division, oversees the implementation of all strategies and the corresponding actions described below.

Detailed information on policies is explained in more detail below.

[S4-2] Processes for engaging with consumers and end-users about impacts

Our goal in respect of our private customers is and remains to align our activities, products and processes to their specific needs and provide them with high-quality service. With that in mind, we actively engage with our customers so we can incorporate user requirements into the (further) development of services and products, and take into account negative or positive impacts into future decisions.

A dedicated unit in the Private and Small-Business Customers (PSBC) segment ensures that the customer and/or user experience (CX/UX) with our products, services and channels meets our quality standards. From idea development and conception to design and product development, customers are involved in the various product stages on an event-driven basis. This gives rise to a continuous dialogue, including in a UX studio set up specifically for this purpose.

The comdirect brand also promotes engagement through 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.

[S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

The Complaints and Quality Management Committee (Beschwerde- und Qualitätsmanagement, BQM) serves as the statutory required complaints management function and is the global functional lead for complaints and quality management. It is responsible for the complaints management policy of the entire Bank and, in this context, oversees fulfilment of interdivisional and cross-segment tasks. This includes, above all, a uniform understanding of how to deal with complaints. The committee also ensures that the Bank’s divisional and segment-specific guidelines are consistent with internal guidelines. In addition to its quarterly reports, other tasks include annual reporting to the full Board of Managing Directors on the situation regarding complaints and the fulfilment of reporting obligations to the Federal Financial Supervisory Authority (BaFin). The BQM Committee additionally functions as a platform for exchanging all essential information in relation to its business purpose.

The complaints management policy of Commerzbank AG sets out binding minimum standards for dealing with and processing complaints based on various national and EU-wide laws and regulations. This policy forms the common basis for all units of the Bank and is implemented through separate procedural instructions for each relevant business area.

The Bank’s goal is to increase customer satisfaction with the services and products offered. Complaints are seen as a valuable resource for improving processes and products. With that in mind, the Bank systematically analyses these complaints, identifies potential for improvement and monitors their implementation.

The complaints handling procedure in the central complaints management system define the specific processes for dealing with complaints from private customers of the Commerzbank brand. This procedure is based on the overarching complaints management policy and is specifically geared to the Private and Small-Business Customers (PSBC) segment. It ensures that complaints handling complies with legal and regulatory requirements while at the same time providing a high level of customer satisfaction.

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Due to their separate system landscapes, the brands Commerzbank, comdirect and onvista bank use different complaints management systems. Each of these systems constitutes the regulatory required central complaints register for the respective brand.

All complaints from private customers are transferred to the central complaints register regardless of the contact channel chosen (e.g. e-mail, complaints form, letter, branch or whistleblowing system). This choice of contact channels is intended to promote awareness among customers of the complaint options available, which they can select according to their personal preference. For information on the safety of anonymous complaints submitted via the whistleblowing system and the protections afforded against possible retaliation, see ESRS S1-3.

For complaints from private customers of the Commerzbank brand, this is the Quality Management Tool (QMT) application. Complaints are processed in the order they are received in accordance with the provisions outlined in the complaints handling procedure – with the goal of offering our customers an acceptable and amicable solution. Commerzbank has enlisted the services of Commerz Direktservice GmbH (CDS) to receive, record and process customer complaints.

As part of the established quality assurance measures in segment management (PSBC-SM) as they pertain to risk and quality management, the letters sent in response are checked not only to ensure that they comply with regulatory requirements, have dealt with the issue efficiently and have been processed correctly, but also that they are clear and comprehensible for the recipient.

A defined key performance indicator (KPI) is used to measure the proportion of customer complaints processed within seven working days. The aim is that at least 80% of customers who submit a complaint receive a response to their complaint within this timeframe – in line with the principle of quick and efficient resolution as enshrined in the complaints management policy. The KPI is determined and evaluated on the basis of the complaints received in the reporting quarter. The results are documented in the quarterly reports.

The KPI “follow-up complaint ratio” is a crucial indicator for measuring the principle of solution-oriented complaints processing, which is likewise anchored in the complaints management policy. The aim is that no more than 10% of customers who have submitted a complaint come back to us with the same issue after their initial complaint has been answered. The reference value is the number of complaints received in the reporting quarter. This ratio is evaluated and presented in the quarterly reports.

Further quality standards have been agreed for PSBC in addition to these two KPIs.

The first of these is the indicative satisfaction rate, which shows the proportion of complaints where the customer's request was

granted or a viable alternative was offered. The aim is to achieve a satisfaction rate of at least 75% out of all complaints closed during the monitoring period. The results of this analysis are evaluated and presented in the quarterly reports.

For us, a low follow-up complaint rate and a high indicative satisfaction rate are evidence that our customers perceive our complaints process as trustworthy and professional.

Another important quality standard is the average processing time, measured in working days. This objective reflects the requirement stipulated in the complaints management policy to offer a prompt resolution to customers who submit a complaint. The reference value is the number of complaints received in the reporting quarter. The results of this analysis are evaluated and presented in the quarterly reports.

The reports prepared in Risk and Quality Management are sent to the Segment Board and members of the Divisional Board for PSBC, the full Board of Managing Directors, Sales Management, the BQM Committee, as well as the Safeguarding Officer, Compliance, Audit and the Delivery Organisation. The latter is a team of technical and IT specialists who work together using agile business methods to bring our digital offering to market faster and more flexibly.

[S4-4] Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

Actions on material impacts, risks and opportunities related to consumers and end-users

The individual actions related to impacts on our customers are explained in ESRS S4-2 and S4-3 as well as in the following company-specific disclosures. All actions are implemented in ongoing banking operations unless otherwise described in the company-specific disclosures.

Procedure for defining actions

The annual strategy process involves not only analysing market developments, but also the interests of private customers and topics that are considered particularly relevant for our retail banking business in the coming planning period.

As part of the strategy process, relevant topics are discussed and actions are identified.

Avoiding negative impacts and risks

The Bank has pledged to respect rights and comply with applicable legislation, with this commitment reflected in a large number of policies and actions. We avoid negative impacts by maintaining an ongoing dialogue with our customers and upholding our corporate values. In addition, Internal Audit monitors compliance with legal requirements and regulations. To avoid negative impacts on our private customers, we offer various reporting channels as part of our quality and complaints management, including e-mail, a complaints form, letter mail, branches and the whistleblowing system. Complaints management forwards the complaints to the relevant specialist departments and asks for a statement in response to the customer, ensuring that any necessary remedial action is taken in a timely manner.

Further information can be found in ESRS S4-3.

Resources for managing impacts, risks and opportunities

Increasing customer satisfaction and enhancing our appeal as a financial service provider in the private customer market is a central tenet of our strategic planning. To achieve this goal, funds and resources are made available to the responsible internal project or specialist teams for implementing measures aimed at making processes and products in our business with our private customers even better – and consequently increasing positive impacts and opportunities, or conversely avoiding negative impacts and associated risks. The resources used take the form of employee capacities and financial resources, although these cannot be named specifically due to the large number of different projects and line tasks.

The implementation and effectiveness of the agreed actions is reviewed and monitored within the scope of day-to-day line or project work to ensure that the defined targets have been achieved. The actions are additionally presented to the full Board of Managing Directors and the Segment Board for Private and Small-Business Customers (PSBC) as well as to the designated committees.

[S4-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Customer satisfaction is a strategic goal and one of the three core strategic steering elements of Commerzbank AG alongside increasing employee satisfaction and financial results.

To measure satisfaction among private customers, a satisfaction index is compiled and reported to the full Board of Managing Directors. Customer satisfaction additionally forms part of the target agreements for our senior staff. Details are explained in the company-specific disclosure below.

No further result-oriented objectives have been agreed within the meaning of the ESRS. The reason for this is that all company-specific disclosures below are based on legal requirements or strategic management decisions, which are processed either on a project basis or by specialist departments in order to ensure timely implementation within the framework of predefined budgets. Targets are monitored within the framework of project governance, either by a steering committee or by bodies such as the full Board of Managing Directors and the Segment Board for Private and Small-Business Customers (PSBC) or committees designated for this purpose.

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Entity-specific disclosure: Product responsibility

Policies

Investments and asset management

The regulatory framework in the financial sector is largely determined by the Markets in Financial Instruments Directive (MiFID), i.e. EU Directive 2014/65 and the associated regulation (Commission Delegated Regulation (EU) 2017/565). These laws aim to strengthen investor protection, increase transparency in the financial market and safeguard market integrity. They stipulate strict guidelines governing investment advice and the distribution of financial instruments to ensure that the interests of our customers are protected at all times. These rules are binding throughout the European Union and form the basis for regulation of the financial services market. Implementation of the legal requirements has been adopted by the “Advisory guidelines – Basics for WpHG and investment advice / order process”.

Accounts and payment methods

Commerzbank Aktiengesellschaft complies with all applicable laws and regulations, such as the provisions of the German Civil Code (Bürgerliches Gesetzbuch, BGB) and the Act on Alternative Dispute Resolution in Consumer Matters (Verbraucherstreitbeilegungsgesetz, VSBG). For that reason, an additional strategy within the meaning of the ESRS is not necessary.

Actions

Investments and asset management

Regulation plays a central role in the area of financial instruments and investment services, especially product governance (regulatory framework governing the product offering). As a distributor, manufacturer and financial portfolio manager, Commerzbank AG bears a considerable amount of liability. This liability extends both to the design, development and distribution of financial instruments and to the provision of investment services such as financial portfolio management, investment advice, financial commission business and contract brokerage. The target market is defined by our product management within the scope of the product governance requirements, including as part of the New Product Process (NPP), which ensures that new products meet regulatory requirements. These processes are continuously monitored and updated to ensure compliance with all relevant regulations.

Accounts and payment methods

The General Terms and Conditions (GTC) of Commerzbank AG contain, among other things, important rules regarding complaints and the ombudsman procedure. The GTC describe in detail the procedures governing complaints and alternative dispute settlement, which apply to all customers. A publication requirement also applies, according to which the relevant information must be made available both in our branches and online.

At Commerzbank, product development in the financial sector takes place in strict consideration of regulatory requirements, particularly product governance. This ensures adherence to the NPP and applicable market principles so that new products not only comply with legal requirements but also meet the needs and interests of the defined target market for which the products are designed. This process is reviewed and developed on an ongoing basis to ensure the highest standards in product development.

Targets

No result-oriented objective has been agreed within the meaning of the ESRS. Further information can be found in ESRS S4-5.

Entity-specific disclosure: Customer satisfaction

Policies

We want to fundamentally restructure our private and small-business customer business – developing it into combination of a high-performance direct bank and a nationwide provider of comprehensive advisory services. As a qualitative target criterion, customer satisfaction forms part of this Strategy 2027 and is on the list of targets for risk takers; it is also included in the targets of the Board of Managing Directors. At the end of 2022, the Board of Managing Directors of Commerzbank AG therefore decided to establish a customer loyalty index – the KUBIX – as a strategic instrument to facilitate uniform measurement of customer loyalty throughout the Bank and, for the first time, set a concrete target value for the 2023 financial year.

These policies and the associated measures ensure that any potentially significant risk of decreasing customer satisfaction is identified early on and appropriate action is taken to mitigate the negative impacts.

Actions

The KUBIX is compiled as part of the “Customer Barometer” customer survey as a central key performance indicator (KPI) for customer loyalty. The results are incorporated into our performance dialogue for senior managers for setting goals and incorporating feedback. In addition, an analysis is performed to identify strengths and weaknesses and the findings are evaluated to derive concrete areas of action. A representative random sample is used to ensure a holistic overview of customers.

The “KUBIX” customer loyalty index is compiled by evaluating the three core questions of overall satisfaction (C-Sat), willingness to recommend (NPS) and competitive advantage. The two most important ratings – overall satisfaction and willingness to recommend – each account for 40% of the overall value, while the secondary evaluation criterion of competitive advantage accounts for 20%. The KUBIX, which is scored on a scale from 0 (no customer loyalty) to 100 (maximum possible customer loyalty), is collated for Commerzbank’s private customer and small-business customer business, which includes the comdirect brand. Separate surveys of customer loyalty are carried out for competing banks, meaning that the KUBIX can also be evaluated in a competitive comparison. At the subsidiary mBank, only one NPS measurement is performed for the purpose of assessing customer loyalty.

Customers of Commerzbank’s private customer and small-business customer business, including comdirect, are surveyed in two waves each year, both online and by phone. Following the first wave, interim results are communicated in the private customer and small-business customer business for the first half of the year; a full-year report – containing driver analyses and recommendations for action – is then prepared at the end of the year. The Group Management Communications division oversees data collection and results reporting, while the respective departments are responsible for implementing the actions derived from the data and results. Progress and their impact on customer satisfaction are a crucial element of annual results reporting.

An independent market research institute carries out the Customer Barometer survey and compiles the KUBIX.

Targets

For the private customer and small-business customer business (PUK), the customer loyalty figures (KUBIX) measured in 2024 were above the targets defined by the Supervisory Board and the Board of Managing Directors (PUK including comdirect +5 index points), demonstrating that we have made significant progress in keeping our customers loyal to the Bank. The figures are used to manage and measure target achievement and are disclosed on a regular basis to the administrative, management and supervisory bodies.

Commerzbank does not publish its customer loyalty figures because the KUBIX is a separate customer loyalty index that is otherwise not prevalent in the market. This lack of comparability with other common market loyalty indices, such as a pure C-Sat or NPS survey, can lead to interpretation errors and inaccurate classification by third parties. Choosing not to publish these figures therefore avoids the resulting high risk of incorrect interpretation and potentially harmful communication.

Entity-specific disclosure: Customer service and customer proximity

Policies

The strategy until 2027 places particular emphasis on a seamless customer experience through the integration of various communication channels. The goal is to maximise customer satisfaction with a view to establishing Commerzbank as a leading digital advisory bank. The internal manual on “Sales management in the Private and Small Business Customers segment” explores sustainable customer relationships in a broader sense, derived from overarching strategic statements. We want to provide our customers with advice in the manner they want to receive it – whether digitally, remotely, by telephone or in person – and empower them digitally so we can offer them faster and better support through suitable digital offerings.

Actions

We have set up an advisory centre offering comprehensive services that also serves as a central point of contact for roughly two-thirds of our private customers at weekends. In addition, service requests can be handled autonomously online via mobile phone or telephone – 24 hours a day, 365 days a year. In our Wealth Management and Private Banking business, dialogue is an important part of the

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advice we provide. This dialogue focuses on developing a comprehensive understanding of the current and future needs of our customers, devising an appropriate investment strategy and then defining the next steps, which are discussed at least once a year. Due consideration is given to the asset, income and tax situation as well as to the goals, needs and risk profile of the specific customers.

Targets

No result-oriented objective has been agreed within the meaning of the ESRS. Further information can be found in ESRS S4-5.

Entity-specific disclosure: Protection against over-indebtedness

Policies

Loans

When granting loans, it is crucial that the lending decision is based on the borrower's debt-servicing capacity, and not solely on the collateral provided for the loan.

Before a loan is approved, an extensive review is performed of the borrower's debt-servicing capacity in accordance with the requirements of the internal guideline "Creditworthiness check for private and small-business customers".

In addition to the requirements of the BGB and the German Banking Act (Kreditwesengesetz, KWG), the European Banking Authority Guidelines on loan origination and monitoring (EBA GL LOaM) are also taken into account, which additionally require the borrower's creditworthiness to be checked from multiple perspectives to identify negative influences on estimated income and expenditure with regard to factors such as inflation, retirement and a potential decline in rental income.

Loans, deposits, accounts and payment methods

In Commerzbank AG's retail banking business, the policy governance regulations for banking products seek to integrate the interests,

objectives and characteristics of consumers when designing and launching products on the market. These governance structures are intended to avoid potential damage to the target market and keep conflicts of interest to a minimum. The products covered by these regulations include loans, deposits, accounts and payment services for consumers in accordance with Art. 13 BGB and founders of new businesses pursuant to Art. 513 BGB. Responsibility for governance in the Private and Small-Business Customers division lies with the Divisional Board member for Strategic Product and Channel Management (SPC). The Bank thus complies with the requirements stipulated by BaFin, which were set out in Circular 08/2023 (including target market concept and product governance) pursuant to the EBA Directive.

The policies specified above for protecting against over-indebtedness offer the potential opportunity to prevent loan defaults for Commerzbank AG.

Actions

Loans

Before approving a loan, Commerzbank conducts a comprehensive review of the borrower's debt-servicing capacity. For example, minimum amounts (fixed sums) are defined for living expenses, which as a rule only take regular income into account.

In addition, a forecast is made to assess whether the borrower will remain solvent over the entire term of the loan, even under changed conditions, such as lower income due to retirement, inflation or interest rate increases.

If the customer's creditworthiness deteriorates significantly, a dialogue is initiated with the customer at an early stage to avoid the possibility of default.

Commerz Service-Center Intensive GmbH (CSCI) is responsible for adjusting and implementing automated clearance of arrears settlements and debt collections for and on behalf of Commerzbank.

Loans, deposits, accounts and payment methods

2024 saw implementation of the EBA guidance pertaining to BaFin Circular 08/2023 affecting offerings in the areas of loans, deposits, accounts and payment services. The regulations outlined in the guidance and in the BaFin Circular define requirements for internal processes, functions and strategies governing the design, market launch and review of these products throughout their entire product life cycle.

Core aspects are to define the respective target market and set target market criteria, as well as to consider the products from the consumer's perspective. It is equally important that relevant information is passed on to product distributors. This is intended to ensure that the products not only comply with legal requirements, but are also effectively aligned to the interests, objectives and characteristics of the target market.

Targets

No result-oriented objective has been agreed within the meaning of the ESRS. Further information can be found in ESRS S4-5.

Entity-specific disclosure: Access to banking products for people with physical and cognitive disabilities

Policies

The strategy governing access to the Bank's offerings for people with disabilities is based in large part on the German Accessibility Act (Barrierefreiheitsstärkungsgesetz, BFSG). The focus of the BFSG is on the digital accessibility of services and products for consumers, which from a banking perspective includes banking services and self-service devices such as ATMs and banking terminals.

The BFSG was approved in 2021 and supplemented in 2022 by an ordinance on the specific accessibility requirements (Verordnung zum Barrierefreiheitsstärkungsgesetz, BFSGV). Both will come into force on 28 June 2025.

Neither the act nor the ordinance itself defines requirements governing the technical implementation of digital accessibility. Rather, reference is made to the latest technological developments and standards relevant to accessibility. These are essentially the DIN standard EN 301549 and the Web Content Accessibility Guidelines (WCAG), which are applicable internationally.

In the retail banking business, a policy on digital accessibility in accordance with the BFSG was published on 1 July 2023; since then it has applied to all changes and new developments that fall within the scope of the BFSG. The policy aims to strengthen accessibility,

particularly digital accessibility, in accordance with the BFSG/BFSGV. It also contains the requirement that relevant information on banking services defined in the BFSG are explained in language that is easy to understand and does not exceed language level B2 of the Common European Framework of Reference for Languages.

Branch manuals (such as the manual for advisory and premium branches) also refer to structural accessibility at branches and business premises; implementation of structural accessibility is governed by DIN 18040 and the respective federal state building codes.

When choosing new self-service devices, we will also ensure that they meet the standards of the Americans with Disabilities Act (ADA) in future. Strategic implementation of self-service ATMs is governed by the requirements of the BFSG and recommendations from an audit conducted by an independent service provider with many years of experience and expertise in the area of digital accessibility.

Actions

All actions related to implementation of the BFSG pursue one core aim: to empower people with disabilities to participate equally in economic life. Barriers with respect to digital channels (i.e. website and app) and operating self-service devices need to be eliminated by 28 June 2025 as a result. The associated actions include adjusting contrast settings, scaling screen content, videos with closed captioning, replacement text for image content, and voice output on ATMs. Concerning self-service devices, the BFSG provides for a transition period of 15 years from the date of initial commissioning, but no later than 2040.

A living style guide (LSG) – a digital toolbox for designing barrier-free functions and designs – is implemented as a dynamic reference document for all IT developers to ensure that digital accessibility is taken into account in all technical applications.

Around two-thirds of our branches are accessible at ground level. When an existing building is renovated or a new building is constructed, the installation of guidance systems for the visually disabled in lobby areas is examined and implemented where feasible.

In addition, our "Action Plan Inclusion 2.0" was published on 6 December 2023 outlining ambitious goals for creating an inclusive work environment, also with regard to a digitally accessible range of products and services for private customers. This plan is supported by the Board of Managing Directors and the Supervisory Board. Further information on the action plan is disclosed under ESRS S1-12.

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Targets

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Entity-specific disclosure: Data protection

Data protection is a defining topic for Commerzbank, both with regard to its own employees as well as to its customers. Consequently, Commerzbank has removed the topic of data protection and privacy from the topic-specific standards ESRS S1 and ESRS S4 and instead has chosen to address it separately in a company-specific disclosure.

By sensitising and training its own employees and implementing effective protective measures, the Commerzbank Group can raise awareness of data protection and improve the level data protection itself – thereby making an important contribution to the topic of data protection.

Policies

Commerzbank places great emphasis on trust in its long-term business relationships. Commerzbank takes the protection of its customers' and employees' personal data very seriously and adheres to applicable data protection rules, in particular the provisions of the EU General Data Protection Regulation (GDPR). The handling of personal data and customer data is regulated in the Group Data Protection Policy.

The purpose of this policy is to ensure a consistently high level of data protection in the Group and that the rights and freedoms of data subjects are respected over the long term. Regular training and awareness-raising measures strengthen employees' appreciation of data protection risks and increase their competence in handling sensitive information. This policy and the accompanying information security specifications define protective measures and create an awareness of security threats. This, in turn, reinforces data security and boosts trust on the part of employees and customers that their personal data will be handled responsibly.

The aim of this policy is to ensure a consistently high level of data protection within the Group and to respect the rights and freedoms of data subjects in the long term. Personal data will only be processed if the data subject has provided their consent, if this is necessary for performance of a contract and if the GDPR or other legislation permits or prescribes such processing. The economical, proportionate, necessary and legally permissible handling of personal data and its purposeful processing as well as the guarantee of transparency and information to the data subject are obligations

under the Charter of Fundamental Rights of the European Union, with which Commerzbank expressly complies. In addition, Commerzbank only transmits personal data to third parties if this is lawful and it is not apparent that there is a risk to the rights and freedoms of the data subject. Commerzbank deletes personal data as soon as they are no longer required for business purposes and there are no other legitimate reasons to keep them, such as statutory retention periods. Where required by law, we can demonstrate that we comply with the principles governing the processing of personal data. Commerzbank has implemented technical and organisational measures to guarantee these goals in the long term. In the event of enquiries, complaints, requests for information and violations of the protection of personal data, affected persons can contact Commerzbank's data protection officer at any time via the e-mail address published on the Commerzbank website, and guarantees immediate information and close communication with the data subject, especially if there are possible risks to their rights and freedoms.

With regular data protection impact assessments when processing and transmitting personal data, the risks are evaluated and countermeasures are taken to avert negative consequences for data subjects. Commerzbank employees are regularly trained in data protection and supported in achieving data protection goals. Personal data will only be disclosed to authorities if Commerzbank is legally obliged to do so. Insofar as it is obliged to do so, it reports on this and other data protection-related topics via its website.

Failure to comply with the General Data Protection Regulation may result in unlawful processing of personal data and may incur fines of up to €20m or 4% of annual sales. In addition, the rights and freedoms of data subjects could be adversely affected. The data protection officer monitors compliance with this regulation and other laws relating to the processing of personal data. The procedures are set out in the Group Data Protection Policy, the Data Protection Manual and internal procedures. The monitoring process encompasses document reviews and technical implementation checks, and also extends to on-site inspections at units and processors.

The Group Data Protection Policy applies worldwide to all employees of the Commerzbank Group as well as to all other parties who have access to information of the Commerzbank Group. The policy also sets out the basic requirements applicable to third parties handling personal data controlled by an operating unit within the Group. These rules must be incorporated accordingly in contracts with third parties, for example with data processors.

At the highest level, a member of the Board of Management and the Divisional Board Member for Data Protection are responsible for implementing the strategic guidelines of the Group Data Protection Policy. In the 2024 reporting year, this responsibility was transferred on 1 December from Group Organisation & Security to Group Legal, and thus to the remit of the Chairwoman of the Board of Managing Directors.

Data protection applies to the data of all natural persons whose personal data are processed by the Group and who are governed by applicable laws. These regulations were taken into account when drawing up the Group Data Protection Policy. Compliance with these requirements is ensured by the data protection officer, the legal departments and the members of the Group-wide data protection organisation of the Commerzbank Group, who monitor the legal situation on a continual basis.

The Group Data Protection Policy can be viewed on the Commerzbank intranet. In addition, details about the processing of personal data are published on the Internet as a privacy statement, as a data protection notice and in accordance with the transparency obligations of the General Data Protection Regulation.

Actions

The key actions related to data protection include providing ongoing advice and support for projects in the business units as well as training courses (including a test), that are conducted for all employees on the applicable data protection regulations and the Group Data Protection Policy. These actions are important for preventing misconduct when handling personal data and help ensure continuous compliance with legal data protection requirements.

No explicit timeframe has been set for implementing these actions as they are offered and executed on an ongoing basis.

Key figures

Data protection complaints and incidents are reported in absolute numbers. No external validation is carried out for the parameters.

Concerning data protection complaints, the cases were generally resolved without any damage to the Bank. In some cases, the complaints reveal evidence of process deficiencies. In cases such as these, changes are made to deletion and review processes in coordination with the specialist department concerned.

If data protection violations are found, the responsible units are tasked with identifying and implementing potential for improvement. On top of this, manual errors can be counteracted through participation in training courses, by testing correct implementation of double-checks and by making targeted use of artificial intelligence.

Targets

The applicable laws and regulations in the area of data protection determine the framework and associated targets. Beyond this, no further measurable results-driven targets are set. Spot checks and controls are carried out to monitor whether the actions are effective. Since data protection complaints and violations often have a direct impact on data subjects, these also alert the Bank to areas in need of improvement; such cases are followed up and any identified deficiencies are remedied, as appropriate.

Data protection complaints and data protection incidents

	2024
Data protection complaints	1,011
Data protection incidents	1,737

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Governance standards

[G1-1] Business conduct policies and corporate culture

Developing and fostering corporate culture

The corporate values 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.

Our values provide a roadmap for everyday life:

- Integrity is the foundation of our business model
We are attentive, trustworthy and reliable.
- Performance is our engine
We are courageous, ambitious and enthusiastic.
- Responsibility is our mission
We act sustainably, purposefully and entrepreneurially and stand up for one another.

The corporate value “Integrity” plays a crucial role - integrity forms the foundation of our business model. As a Bank, we want to act sustainably and with integrity. This fosters trust in us as a Bank for our customers, enhances our profile as an employer, business partner and company, and underlines the important role we play in society. Honest and responsible conduct is one of the strongest drivers of a positive reputation and is crucial for our success on the market.

That is why in Germany, for example, we submit an annual declaration of compliance with the German Corporate Governance Code. Whenever such recommendations exist, we take them into account in the way we act.

Based on our corporate values, we have set out codes of conduct for acting with integrity, which provide all employees of the Commerzbank Group with a binding framework for lawful and ethically appropriate conduct in their day-to-day working environment. The codes of conduct are reviewed on a regular basis and revised if required.

Building on this, we have developed and implemented targeted initiatives. The Culture Award is a vehicle for the Bank to express its recognition and appreciation. We give the award to people who give their all in pursuit of our strategic goals of growth, responsibility and integrity, as well as excellence, diversity and inclusion. The Commerzbank Culture Award is deliberately designed to be

participatory: All employees can nominate their colleagues for the award. A jury then narrows down the selection from among the nominations received, and finally all employees are asked to vote for their favourite on the intranet. An in-person event is held in the first quarter of each year where the winners receive their awards. The annual nominations are testament to the popularity of this format among colleagues.

“Hello Yellow” is an onboarding initiative where we greet and welcome new colleagues to Commerzbank in person and sit down with them to talk about our culture, values, strategy, brand and much more. A similar event series has been set up for existing employees called “Hello Yellow – Meet you!”. Under the motto “inform and network”, this initiative gives employees the opportunity to learn about the Bank’s strategic direction, share experiences and network with one another. Both initiatives have been well received. The feedback on the events also shows that they offer added value in terms of content and culture.

To strengthen our feedback culture and at the same time support our managers in their personal development, we offer voluntary and anonymous management feedback. All of our managers were able to take advantage of this development opportunity in 2024 – and the high participation rate confirms that it is well received among staff.

Investigation of unlawful conduct

The following statements on whistleblowing, consequence management, and the prevention of bribery and corruption relate to the companies included in the scope of consolidation as defined by the CSRD that are relevant for compliance and were identified as material by the impact analysis used to determine key performance indicators, complementary information and disclosure requirements.

Some of the companies included in the scope of consolidation for the first time during the reporting period are still in the process of being integrated into the Group management system, known as Global Legal Entity Governance (LEG).

The Bank’s internal Group Compliance division uses the LEG to manage the requirement to implement Group-wide compliance standards in affiliated companies – specifically, in Commerzbank subsidiaries and sub-subsidiaries.

The statements made herein implicitly cover the companies newly included in the financial scope of consolidation, such as Aquila Capital Investmentgesellschaft mbH and Yellow Automation GmbH.

The Bank does not tolerate violations of laws or breaches of regulatory or internal guidelines.

The principles for dealing with misconduct are described in the internal policy “Culture of Integrity/Consequence Management”. If an incident of misconduct has been clearly identified, it is the responsibility of the respective manager to initiate measures in coordination with the HR department.

If an allegation is made against an employee where there is initial suspicion of a criminal offence, an administrative offence or a serious breach of duty arising from the employment relationship, but this allegation requires further investigation, such investigations will be carried out by the specialised unit within Compliance within the framework of the corresponding Group Works Agreement on conducting special internal investigations. The mechanisms employed at Commerzbank AG are defined as minimum standards by the unit within Compliance responsible for conducting special investigations.

Protection of whistleblowers

Whistleblowing cases submitted via the whistleblowing system or other designated reporting channels will be processed in accordance with the data protection information provided at the time of the report. The sharing of data and documents is always subject to the need-to-know principle.

Data electronically exchanged via the whistleblowing system are encrypted and subject to the Group Data Protection Policy and the Data Protection Manual. Personal data are transmitted in accordance with applicable legislation and internal guidelines if and to the extent that this is necessary to process the whistleblowing case in accordance with applicable legislation or to pursue other legitimate interests on the part of Commerzbank, such as assessing financial and legal risks as well as reputational risks.

Commerzbank strictly protects the interests of all parties involved, which includes:

- protecting whistleblowers, in particular protecting their anonymity if desired – to the extent permitted by law – and protecting them against discrimination,
- protecting the accused, in particular protecting them against denunciation,
- protecting Commerzbank, in particular to minimise risks and damages.

Anyone who submits a report in good faith and to the best of their knowledge shall be granted appropriate protection, to the extent permitted by applicable law, against unfair treatment, dismissal or other detriment as a result of the information they disclose, even if it transpires during the course of the investigation that the reported suspicion is ultimately unfounded.

The Bank uses the Intranet and the homepage as communication channels on the topic of whistleblower protection and refers to the implemented reporting channels. In addition, we have published rules of procedure detailing the complaints procedure within the meaning of the Supply Chain Due Diligence Act (LkSG). Furthermore, the topic of whistleblowing is highlighted in various training courses for the Bank’s employees.

Procedures for investigating violations of corporate policy

The Board of Managing Directors of Commerzbank uses a cross-segment committee to operationalise its duty to conduct special internal investigations in the event of documented suspicion of misconduct.

Special investigations in relation to employees are carried out independently, objectively and with integrity. As stipulated by a separate Board of Managing Directors mandate, responsibility for these special investigations lies with a division within internal Compliance.

The compliance function sets Commerzbank’s minimum standards for conducting special investigations concerning employees. This ensures uniform and transparent handling of special internal investigations within the Group.

To preserve the independence of the responsible compliance function, special internal investigations are only carried out on behalf of authorised requesting parties in accordance with a separate Board of Managing Directors mandate.

Special internal investigations carried out by the division enable the Board of Managing Directors and other decision-makers appointed within the framework of the business organisation, or the managing bodies of the respective Group companies, to make informed decisions and put a stop to possible violations, as well as to sanction any identified misconduct and prevent it from happening again in the future.

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Training on corporate policy

Commerzbank's codes of conduct not only depict the Bank's values, but also cover other topics that are regularly communicated to all employees as part of mandatory training courses (usually on an annual basis); participation in these courses is being tracked.

To promote a strong culture of integrity, managers are taught about consequences management as part of a mandatory annual online training course. Respective training is also provided when transitioning to a new managerial position. The online training is also available to employees as an optional training measure.

High-risk functions related to corruption and bribery

All functions and responsibilities may generally harbour inherent corruption and bribery risks. Risk-increasing factors such as accepting and giving gifts and entertainment or dealing with business partners can arise as part of day-to-day business in all areas. In accordance with the implemented three lines of defence model, each employee represents the first line of defence for preventing bribery and corruption risks. Employees are responsible for complying with applicable anti-corruption laws as well as with requirements of internal anti-bribery regulations and other applicable Commerzbank regulations. For further information, see G1-3 "Training on combating corruption and bribery".

[G1-3] Prevention and detection of corruption and bribery

Procedures for dealing with incidents of corruption or bribery

It is the highest principle to counter bribery and corruption with zero tolerance. Commerzbank explicitly does not tolerate corruption or other criminal acts by employees. The Bank has a zero-tolerance approach to criminal offences. Any employee who is proven to have breached this principle will face the full consequences under employment, civil and criminal law.

The Divisional Board Member for Group Compliance and the head of the specialised division for special investigations notify the Board of Managing Directors on a regular basis and as-required about current topics, projects and significant ongoing special investigations. In addition, the Audit Committee of the Supervisory Board receives reports on specific events.

For further information on the procedures for dealing with incidents of corruption and bribery, see ESRS S1-3 "Approach to implementing remedial measures", ESRS S1-17, including "Investigation of unlawful conduct" and ESRS G1-1, under "Procedures for investigating violations of corporate policy".

Procedures for preventing corruption and bribery

Commerzbank has the ethical and regulatory responsibility to ensure that robust internal safeguards and controls are implemented to prevent bribery and corruption risks. The responsibilities with regard to combating bribery and corruption as well as dealing with corruption-sensitive topics and processes are outlined in a written framework, the Global Anti-Bribery and Corruption Policy (ABC Policy).

Through the ABC Policy, Commerzbank actively seeks to combat bribery and other forms of corruption. It includes individual measures that apply across the Bank, such as specific guidelines on gifts and entertainment, and defines how to deal with corruption-sensitive topics such as the Business Partner Due Diligence, in which business partners are continuously checked for corruption-relevant hits in commercial databases on a risk basis during the initiation of business and also in the course of the business relationship. Newly negotiated contracts between Commerzbank and its service providers have also included an integrity clause for several years now. On top of this, raising awareness of bribery and corruption risks among employees is a key element of the prevention strategy. This includes regular internal and external communication, various training formats as well as communication on the Global Code of Conduct and other specific procedures and process descriptions for specific areas.

Alongside the policy, Group Compliance provides support and advice to business units with regard to process development and transactions, for example M&A transactions. In addition to the advisory function provided by Group Compliance, all German units and foreign locations have dedicated employees who have been appointed as on-site contact persons for questions about preventing corruption.

Bribery and corruption risks are also examined as part of the global compliance risk analysis, which involves assessing the current risk situation and evaluating the associated control activities. The potential bribery and corruption risks included in the analysis essentially comprise the risk factors of gifts and entertainment, business partner compliance, lobbying, donations and sponsorship activities, as well as recruitment and human resources processes. Group Compliance supports the implementation of the preventive measures derived from the analysis, conducts regular checks to ensure they are working effectively and introduces additional measures if necessary.

To ensure access to compliance-relevant information, guidelines, process descriptions and procedures for combating bribery and corruption are published on the Bank's internal Compliance Policy Portal. This portal is accessible worldwide in German and English, and also features local specifics published in the form of addenda. If changes are made to applicable rules, the users concerned are alerted via a system-driven notification. Moreover, the Bank's intranet is used for providing targeted information on the content of various policies. Employees as well as members of the Supervisory Board and the Board of Managing Directors have access to the Bank's intranet and internal portal.

Trainings on combating corruption and bribery

All Commerzbank employees receive annual, web-based training on the specifications of the ABC Policy and are made aware of bribery and corruption risks in their role as first line of defence. This training creates a general awareness of bribery and corruption risks and imparts basic knowledge on how to prevent and deal with potential risk-increasing factors such as gifts and entertainment or relationships with business partners. Information is also provided on which channels to use for reporting suspicions and who to contact with queries on the topic of preventing corruption.

The training course is assigned to all employees of Commerzbank AG and its subsidiaries who have been identified as relevant for this training. Its completion is mandatory. The training is assigned on an automated basis via a learning management system, which also uses an escalation process to track and monitor completion. Since the course is mandatory, the aim is to achieve a completion rate of 100%. This is not always possible if an employee has been absent for an extended period of time.

On top of this, additional targeted training is provided to business units, functional units and individuals who are exposed to risk-increasing factors in the course of their daily work. Within this context, the Supervisory Board and the Board of Managing Directors are trained and sensitized by the Chief Compliance Officer on issues related to bribery and corruption. Particular focus is placed on risk-increasing factors such as gifts and entertainment, and the respective requirements that must be complied with.

Policies

The policies for preventing bribery and corruption are defined in a global framework. Further information is provided in ESRS G1-3 under "Preventing corruption and bribery".

The ABC Policy defines minimum requirements, roles and responsibilities with regard to preventing bribery and corruption, as well as actions for averting, detecting and handling incidents of corruption appropriately.

Overall, the following risk areas are addressed: Governance, structures and training, human resources processes, gifts and entertainment, business partner compliance, lobbying and political communication, donations and sponsorships, accounting and record-keeping obligations.

Group Compliance has implemented risk-driven safeguards to ensure regular review and monitoring of potential bribery and corruption risks. These include conducting a dedicated compliance risk analysis for bribery and corruption risks, as well as implementing various other controls and local reviews. The safeguards address and minimise the relevant ABC risk areas.

The ABC Policy applies to the Board of Managing Directors and to managers and employees of Commerzbank AG, including its subsidiaries, that have been defined as relevant on the basis of the LEG Policy. The content of the ABC Policy also applies to countries that are subject to less stringent regulatory requirements.

The competent divisional management in Group Compliance is responsible for approving the ABC Policy.

Third-party standards or initiatives

In the fight against corruption and bribery, Commerzbank not only complies with statutory requirements such as the German Criminal Code, the UK Bribery Act or the US Foreign Corrupt Practices Act, but also with the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

It also takes into account internationally recognised standards such as the recommendations of the Financial Action Task Force on Money Laundering (FATF) or the Wolfsberg Anti-Money Laundering Principles / Wolfsberg Anti-Bribery and Corruption (ABC) Compliance Programme Guidance.

In addition, Commerzbank's ABC Policy adheres to the applicable standards and principles of the United Nations Convention against Corruption (UNCAC). The UNCAC is a legally binding international treaty that obliges ratifying states to combat and punish corruption. Germany ratified the UNCAC in 2014.

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Actions

By implementing a comprehensive anti-corruption and anti-bribery framework and adhering to the established minimum standards and safeguards, the aim is to completely prevent any and all incidents of corruption within the Group. Focus is also placed on strengthening the compliance culture and continuously improving safeguards in response to current developments.

To achieve the goals that have been set, the implemented policies, guidelines and processes are updated on regular basis and existing safeguards are checked to ensure they are still effective. Regular internal and external communication, a wide range of training initiatives and our Code of Conduct, which is binding for all employees worldwide, support a corporate culture of integrity.

Commerzbank has implemented the relevant safeguards in line with a risk-based approach. No further actions are currently necessary. Group Compliance manages the requirement to implement actions across the Group. This also involves defining the scope of actions to be implemented. Further information on the actions can be found in ESRS G1-4 “Incidents and actions related to corruption or bribery”.

Key figures

The percentage of employees in high-risk functions at Commerzbank who complete training on the prevention of corruption and bribery is depicted as a parameter.

This parameter covers all employees of Commerzbank AG, and its subsidiaries with compliance relevance; it amounted to 100% in the reporting period.

For further information on this, see ESRS G1-1 “High-risk functions related to corruption and bribery” and ESRS G1-3 “Training on combating corruption and bribery”.

Parameter measurement was validated by the external unit responsible for quality assurance.

Targets

Commerzbank’s overarching goal is to actively combat bribery and other forms of corruption and to completely prevent incidents of corruption within the Group. For this reason, apart from that, no concrete targets have been defined.

Regular monitoring ensures compliance with the implemented rules and regulations for preventing bribery and corruption. The controls carried out for this purpose are checked annually for effectiveness. In addition, Internal Audit (Group Audit) regularly reviews the bribery and corruption prevention framework in its capacity as the third line of defence. Ad-hoc measures are defined and implemented as necessary.

[G1-4] Incidents and actions related to corruption or bribery

Policies

Details on this can be found in G1-3.

Actions

Consequence management ensures a uniform system of punishment for violations of rules and breaches of statutory or regulatory provisions at Commerzbank. Non-compliance with the guidelines for preventing corruption and bribery must be investigated by the responsible manager in cooperation with the Human Resources department and, if necessary, appropriately sanctioned. Commerzbank embraces a zero-tolerance approach to bribery and corruption by employees. Any employee who is proven to have breached this principle will face the full consequences under employment, civil and criminal law. Further information on consequence management can also be found in ESRS S1-3 and S1-17.

Further details on the actions can be found in ESRS G1-3.

Key figures

The number of convictions for violations of corruption and bribery regulations and the amount of fines paid in this context are shown in the table below. The key figures include final or closed legal actions against the bank and employees of the bank in the course of their professional activities due to bribery and corruption. The number of convictions and the amount of fines is recorded taking into account possible restrictions through applicable labour law, data protection and to the extent that it is legally permissible to query employee's criminal convictions.

As in previous years, Commerzbank is not aware of any convictions related to violations of corruption and bribery laws during the reporting period. Likewise, no fines were paid in this context.

Collection of the key figures described above was validated by the external unit responsible for quality assurance.

Incidents of corruption and bribery

%	
	2024
Number of convictions for violations of anti-corruption and bribery laws	0
Sum of fines paid for violations of anti-corruption and bribery laws	0

Targets

Details about the targets related to corruption and bribery can be found in ESRS G1-3 under “Targets”.

Entity-specific disclosure: Prevention of money laundering and terrorist financing

Policies

The Anti-Money Laundering / Counter-Terrorist Financing Policy (Global AML/CTF Policy) is an internal, global policy that sets out the minimum standards that the Bank must meet to comply with the AML/CTF programme. The policy describes the basic principles:

- Determining the AML governance structure and the three lines of defence
- Customer due diligence obligations and “Know your Customer” (hereinafter “KYC”) as part of the customer onboarding process and throughout the entire lifecycle of the customer relationship, including transaction monitoring (hereinafter “customer lifecycle”)
- AML risk assessment for the customer and products as well as the methodology of this risk assessment
- Actions to be taken during the course of the customer/business relationship
- Submitting reports to the Financial Intelligence Unit (FIU) of the customs office if a customer is suspected of engaging in money laundering or terrorist financing
- Prohibited and restricted business relationships and products
- Providing information to management
- Recording and retention obligations for customer data
- Employee training

The competent divisional management in Group Compliance is responsible for approving the policies.

The Global AML/CTF Policy is supplemented by additional internal guidelines, such as the Global KYC (Customer Lifecycle) Policy for implementing KYC requirements. This includes implementing customer due diligence obligations within the customer onboarding process and customer relationship lifecycle and serves to standardise customer acceptance processes within the company.

Both policies are the cornerstones of Commerzbank’s programme to combat and prevent money laundering and terrorist financing. The purpose of the programme and policies is to protect Commerzbank AG and its domestic and foreign subsidiaries and branches from risks associated with money laundering and terrorist financing. Accordingly, they implement the statutory and regulatory requirements stipulated by the German Anti-Money Laundering Act, the EU Anti-Money Laundering Directives, relevant guidelines issued by the European Banking Authority, market standards such as the recommendations of the FATF and the Wolfsberg Anti-Money Laundering Principles.

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The policies apply to all employees at Commerzbank AG. These are also deemed to include the members of the Board of Managing Directors, as well as employees working in domestic and foreign branches, subsidiaries, sub-subsidiaries and other majority shareholdings and companies or consultants commissioned by the Bank. They are therefore valid in Europe, Africa, the Middle East, Asia, Australia, North America and Latin America.

The policies described are supplemented by other accompanying internal specifications (other relevant policies, guidelines, procedural instructions, process descriptions and national addenda), which describe in more detail the due diligence obligations that need to be observed. One of these is the Global AML/CTF Policy for Special Business Relationships, which sets out strategies for combating money laundering and preventing terrorist financing in business relationships involving more complex specifics, especially with other banks (correspondent banks), trading companies and investment funds. It also contains the addenda for Germany and those countries where branches and subsidiaries are located to stipulate the applicable country-specific regulations.

The aim of all guidelines in relation to preventing money laundering and terrorist financing is also to establish a sustainable, effective and risk-based compliance culture within Commerzbank.

Under the three lines of defence principle, protection against money laundering and terrorist financing risks is an activity that is not only restricted to the compliance function. Instead, the organisational controls and monitoring elements are aligned in three sequential levels.

The units in the first line of defence assume responsibility as part of their operational activities for identifying and managing risks and for complying with their own business rules; they are also responsible for setting up process-oriented control mechanisms. Group Compliance, as the second line of defence, sets standards for appropriate risk management by monitoring the adequacy and effectiveness of procedures and controls, and by communicating and assessing any identified deficiencies.

In addition, the compliance function carries out analyses and assessments of compliance risks and ensures that the risk management framework is implemented. Internal Audit, the third line of defence, uses regular and independent audits to check that the compliance function in both the first and second lines of defence is appropriate and effective.

The risk assessment analyses the inherent risk arising from doing business with different customers, customer groups and products and compares this with an evaluation of the corresponding control environment for mitigating the inherent risk. The Bank defines actions to further enhance risk management (e.g. introducing additional controls) as necessary and tracks implementation closely.

The policies define the requirements governing the establishment and continuation of business relationships, the methodology for assessing the money laundering risk posed by the customers, and the prerequisites for submitting suspicious activity reports. As part of the LEG process, the individual units are classified according to their business model and other internal criteria. Accordingly, they must either adapt the global regulations, take note of them, or implement them within the framework of local addenda.

Actions

The following actions are taken in pursuit of the above-mentioned specifications and targets:

- Implementation of policies, guidelines and processes to ensure compliance with regulatory requirements and internal regulations.
- Annual web-based training on the prevention of money laundering and terrorist financing; this is assigned to all employees to educate them on the requirements of the policy and acquaint them with their role as the first line of defence. The purpose of the training is to familiarise employees with the applicable rules and regulations for combating money laundering and terrorist financing, and to enable them to identify (potential) risks and deal with them appropriately. This ensures that employees – as the first line of defence according to the three lines of defence model – are able to effectively fulfil their remit to prevent money laundering and terrorist financing risks. The training is assigned automatically by Human Resources, which uses an escalation process to track and monitor completion of the mandatory course. The course is aimed at all employees of Commerzbank and its subsidiaries who have been identified as relevant for this training; its completion is mandatory.

- Regular internal and external communication as well as globally binding codes of conduct for all employees in the Group to support a corporate culture that promotes integrity.
- Support and advisory provided by Compliance to assist business units with process development and transactions.
- Compliance risk analysis conducted to examine money laundering and terrorist financing risks; this involves surveying the risk situation and evaluating the control activities undertaken by the units.
- Reporting to the management level by the Anti-Money Laundering Office.
- Implementation of control measures related to money laundering and terrorist financing.
- Screening of business partners, i.e. identifying the risk that business partners may be involved in activities related to money laundering and terrorist financing, which is tracked through the IT-based application “Business Partner Due Diligence”. In addition, contracts with business partners contain dedicated integrity clauses to combat money laundering and terrorist financing.
- Implementation of a whistleblowing system, see also ESRS S1-3 “Processes to remediate negative impacts and channels for own workforce to raise concerns”.

The actions serve the overarching goal of preventing money laundering and terrorist financing. Therefore, it is not possible to attribute any concretisable results to them.

The scope of implementation depends on the individual actions, Group-wide implementation in accordance with the LEG process is generally to be assumed; see also ESRS S1-3.

Actions are implemented in order of priority and follow a risk-based approach. Some of the actions have a short-term and event-driven effect, such as business partner screening or transaction monitoring. Some of the actions are medium-term, such as employee training and risk analysis, which are repeated annually and updated as required. The KYC review process, achieves a long-term impact; this is also carried out at regular intervals, currently ranging from one year to ten years depending on the customer category.

Key figures

There are no parameters within the meaning of the ESRS in connection with actions designed to prevent money laundering and terrorist financing.

Targets

Commerzbank’s overarching goal is to actively combat money laundering and terrorist financing. The targets and principles in this regard are determined by applicable laws and regulations. As security is ensured through the aforementioned frameworks and implemented actions, there are no specific measurable targets for money laundering prevention. No targets are set due to the Bank’s zero-tolerance policy, meaning that no case numbers can be specified for concrete targets.

Entity-specific disclosure: Tax transparency

Tax transparency and tax compliance policies strengthen trust in the Bank on the part of customers, investors and the general public by ensuring and promoting responsible and ethical conduct. A lack of tax transparency, on the other hand, can undermine public confidence in Commerzbank.

Group Tax (GM-TAX) has established several elements aimed at achieving these overarching objectives and underscoring the Bank’s zero-tolerance policy to tax-related crimes. These include in particular a tax risk management process to identify, assess and – if necessary – mitigate risks through appropriate measures, as well as a wide range of other internal management and control systems. Various guidelines and policies have also been implemented; these are explained in greater detail below. Implementation is monitored using a standardised approach that is established and applicable throughout the Group. Tax compliance monitoring involves regular or recurring analyses and measures to assess whether the components of the tax compliance management system (TCMS) programme and the process-integrated controls are designed and working effectively, taking into account the principles applied. A monitoring plan is drawn up to document the development and implementation of any monitoring actions.

Responsibility for the monitoring process as it relates to tax compliance issues lies with Group Tax in principle as the second line of defence, and with Group Tax TCM in particular as the standard setter for the topic.

In addition, Group Tax has implemented further monitoring actions relating to local tax functions in an international context or outside of Commerzbank AG, including as part of the Bank-wide, project-based Global Functional Lead (GFL) initiative. Regular dialogue sessions and on-site inspections (spot checks) form an integral part of these actions.

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Policies and guidelines related to tax transparency and tax compliance

Global Tax Compliance Management Policy

A Tax Compliance Management System (TCMS) in accordance with IDW AsS 980 is intended to ensure compliance with a broad range of external and internal regulations as well as fulfilment of applicable tax obligations. The policy lays the basis for the design of Commerzbank's Tax Compliance Management System. Together with the subordinate TCM implementation guideline, which operationalises the requirements of the policy and describes the topics that are relevant for operations according to the methods applied, the policy forms the written framework for Commerzbank's TCMS (TCMS-SFO). The TCMS-SFO as well as the design of Commerzbank's TCMS in general are based on the seven basic elements of IDW Practice Statement 1/2016 "Design of and Assurance Engagements Relating to Tax Compliance Management Systems in Accordance with IDW AsS 980". These are:

- Tax compliance culture
- Tax compliance targets
- Tax compliance organisation
- Tax compliance risks
- Tax compliance programme
- Tax compliance communication
- Tax compliance monitoring and improvement

The principles and rules outlined in the policy are binding in that they establish a minimum standard governing the fulfilment of tax obligations for all corporate units of Commerzbank AG, including domestic and foreign branches and all Commerzbank Group companies. The specific design and scope of the TCMS implemented at the local level depend on the relevance and materiality of the Group company, which is defined on the basis of risk-oriented criteria as part of a multi-stage analysis by Group Tax TCM. If stricter local regulatory requirements regarding tax compliance or the design of a local TCMS apply, these shall be binding for the respective location. Responsibility for compliance with these specific local requirements lies with the respective Group companies. The resulting requirements must be defined by the responsible employees on site and coordinated with GM-TAX Tax Compliance Management in accordance with the GFL concept.

The Board of Managing Directors bears ultimate responsibility for implementing the strategy to prevent tax evasion and promote transparency. Overall responsibility for the global TCM Policy lies

with the head of GM-TAX (management level 1) or management level 2 GM-TAX Tax Compliance Management.

Anti-Tax Evasion Facilitation (ATEF) Guideline

Tax evasion and aiding and abetting tax evasion is a criminal offence in most countries. The "Corporate Criminal Offences of Failure to Prevent the Facilitation of Tax Evasion" (UK CCO) was the first extraterritorial corporate criminal offence to be introduced in the United Kingdom (UK) that holds companies themselves – and not just the persons acting or responsible – liable for customer tax evasion where it was aided and abetted by a person associated with the company.

The Anti-Tax Evasion Facilitation Policy, which is subordinate to the Global TCM Policy, describes Commerzbank's ATEF compliance programme and defines the preventive measures to combat the aiding and abetting of tax evasion by persons associated with Commerzbank, as required by the UK tax authority HM Revenues & Customs (HMRC) in relation to the British criminal offence of aiding and abetting tax evasion (UK Corporate Criminal Offences of Failure to Prevent the Facilitation of Tax Evasion, UK CCO).

The principles and provisions of the policy are binding for the scope of application of Commerzbank AG in Germany and abroad. For other group units, the policy is essentially treated as a recommendation. Compliance with specific local requirements is the responsibility of the respective subsidiaries.

Overall responsibility for the ATEF Policy lies with the head of GM-TAX (management level 1) or management level 2 GM-TAX Tax Compliance Management, analogous to the overarching global TCM Policy.

DAC 6 Compliance Policy

EU Directive 2018/822/EU (sixth amendment to Directive 2011/16/EU or "DAC 6" for short) came into force on 25 June 2018. This required the member states of the European Union to introduce legislation prescribing a reporting obligation for cross-border tax arrangements by no later than 31 December 2019. For Germany, it was implemented in Art.138d-k of the Fiscal Code (Abgabenordnung, AO). The new regulations have been in effect in Germany since 1 July 2020.

The DAC 6 Compliance Policy stipulates the regulatory requirements governing reporting obligations and the exchange of tax information on cross-border tax arrangements and ensures compliance with these requirements as part of the tax compliance programme (DAC 6 compliance programme).

The DAC 6 Compliance Policy creates the overarching framework for the written regulations on reporting obligations for tax arrangements within the scope of the implementation of the sixth amendment to the EU Directive on Administrative Cooperation. It describes the DAC 6 compliance programme and defines corresponding structures and standards for implementation.

The control and monitoring system for DAC 6 is implemented at Commerzbank within the context of the three lines of defence model: The first line monitors compliance with the respective operational processes at local level and documents these. The second line, GM-TAX Counsel Team Products & Transactions, in its capacity as the technical standard setter, performs regular monitoring to ensure implementation.

The scope of the policy covers the Commerzbank Group globally. The obligation to implement measures in accordance with the policy applies to subsidiaries that have been identified as conducting transactions that are “potentially relevant for DAC 6” based on the results of the (initial) impact analysis and ongoing monitoring as part of the new product process and/or the approval process for special purpose entities. Local implementation must comply with the provisions of this policy in accordance with Commerzbank’s GFL model. This can also be ensured through separate implementation models, provided that these do not conflict with the targets and actions of this policy. In such cases, local implementation must be coordinated with GM-TAX.

Overall responsibility for the policy lies with the head of GM-TAX (management level 1) or responsibility is shared between management level 2 GM-TAX Tax Counsel (technical standard setter) and management level 2 GM-TAX Tax Compliance Management (methodological standard setter).

As part of the OECD and G20 Base Erosion and Profit Shifting (BAPS) project, Commerzbank AG is obliged to comply with the EU Directive DAC 6 and has been reporting relevant tax agreements to the German Federal Central Tax Office since 1 July 2020, including retroactive reports effective 25 June 2018.

Actions

Various actions and controls are applied within the Commerzbank Group to safeguard tax compliance. The main actions to ensure tax transparency within the meaning of the CSRD are outlined below.

Implementing tax-specific risk control matrices

Group Tax has implemented risk control matrices (RCM) as a structured system for identifying, assessing and mitigating potential process-inherent risks. These RCMs were collected for the first time in 2023 as part of risk analysis workshops for all tax types relevant to Commerzbank, and from now on will be updated on a regular basis in line with current findings and legal developments. The purpose of the risk analyses is to systematically categorise relevant inherent risks according to probability of occurrence and loss potential (inherent risk).

Existing risk-mitigating elements (principles, actions and controls) are also taken into account to ensure the residual risk is reconciled and assessed for appropriateness. Weaknesses in terms of inadequate mitigation of identified inherent risks were identified during the initial survey, prompting targeted action to eliminate these shortfalls. Reviewing and ensuring the adequacy of risk mitigation will be a central element of regular RCM updates going forward.

The risk control matrices are an essential tool for managing risk in the area of GM-TAX; in the long term, they are also a crucial building block for carrying out adequacy and effectiveness tests (where necessary) in accordance with IDW AsS 980.

TCM safeguards at Commerzbank AG in Germany

To make sure the control environment of the specialist departments within Group Tax is working effectively, GM-TAX TCM actively supports the annual cycle of TCM safeguards. Within this context, GM-TAX TCM acts as a methodological standard setter, organises annual planning, checks the completeness and plausibility of the TCM safeguards planned by the GM-TAX departments, and monitors any follow-up measures. GM-TAX TCM provides the departments with a standardised template to ensure uniform documentation.

Suitable TCM safeguards are selected according to a risk-based approach. The aim is to ensure that the risk-mitigating elements recorded in the risk control matrices are working effectively and, if necessary, to initiate targeted individual improvements or optimisations. The measures are reviewed and implemented annually and are monitored on a continuous basis.

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Tax compliance management safeguards implemented by external units

In addition, selected national and international subsidiaries and branches implement tax-specific safeguards once a year. As a methodological standard setter, GM-TAX TCM checks the completeness and plausibility of the measures implemented to ensure the approach is as uniform as possible. Selection and implementation of safeguards is the responsibility of the respective unit. Analogous to the TCM safeguards at Commerzbank AG in Germany, the safeguards implemented by the external units are also intended to ensure that the risk mitigation actions are proving effective and reliable.

The scope currently includes the branches in Singapore, Prague, New York and London, as well as Commerzbank (Eurasija) AO, Commerz Real AG and mBank S.A. These measures are also implemented annually.

Reporting on measures to combat tax crimes (ATOM reporting)

Reporting on anti-tax offences measurements (ATOM) includes a quarterly tool-based review of the local design and development status of the tax compliance management system of the units within the IFRS consolidation scope of the Commerzbank Group, as well as monitoring of the development of the inherent and residual risk situation.

ATOM reporting also asks whether any new fraud patterns or developments have emerged relating to tax crimes or tax violations during the period under review. This dialogue on fraud patterns is intended as an aid for investigating regional or national issues to determine their broader relevance, and at the same time provides an overview of the current state of affairs.

While information on fraud patterns is exchanged independently of whether the reporting entity has incurred any loss as a result of this fraud, details are also requested about identified control and process weaknesses, as well as about suspected cases of tax crimes and tax violations. If control and process weaknesses or suspected cases are reported by the units, these are also reported on a consolidated basis to Group Compliance as part of the review of ATOM reporting within the framework of the Bank-wide Anti-Fraud & Corruption Committee (BAFCC).

Reporting is a central tenet of Commerzbank's tax risk management and one of the core responsibilities of the Global Functional Lead.

Tax risk management quarterly reporting

Quarterly Tax Risk Management (TRM) reporting forms part of tax risk management at the Commerzbank Group and aims to identify, assess and systematically manage tax risks at an early stage. This also includes appropriate documentation – not only with regard to the risks, but also concerning the mitigating actions. One of the cornerstones of TRM is a quarterly survey conducted among the Group units consolidated for accounting purposes on tax matters and the resulting risks. The TRM questionnaire also provides an overview of the assessment and completion status of the most recent tax audits.

The purpose is to create a run-down of current tax risk factors so any necessary action can be taken at an early stage.

The action covers the units of the Commerzbank Group consolidated for accounting purposes under IFRS and is carried out quarterly. Quarterly TRM reporting intervals are defined as standard. If significant tax risks arise outside of these intervals, each unit must report these immediately.

ATEF Compliance Risk Assessment

The annual Compliance Risk Assessment (CRA) managed by Group Compliance also includes the risk type "Anti-Tax Evasion Facilitation" (ATEF), which falls under the methodical and technical responsibility of GM-TAX TCM in the CRA process. The annual risk analysis is generally performed with the help of a tool on a Group-wide basis for all domestic segments, foreign branches and relevant subsidiaries of Commerzbank. For ATEF purposes, a preliminary analysis is carried out yearly on the basis of predefined criteria to analyse and define the scope.

GM-TAX TCM performs quality assurance on the responses provided to the ATEF questionnaire by the units classified as in scope and serves as their point of contact throughout the entire process. In addition, GM-TAX TCM supports the units if they require assistance implementing the measures identified in the risk analysis to eliminate vulnerabilities in the risk control environment. Finally, risk profiles are compiled providing details on the risk situation and control environment for each unit, and documenting the final results of the risk analysis. These risk profiles are created by the local compliance functions, the responsible relationship manager for each risk type (for ATEF: GM-TAX TCM – and the relevant points of contact for the first line of defence).

The results of the ATEF compliance risk analysis also form part of the TCM annual report.

Legislation screening

Changes in tax law may mean that processes have to be adapted so they continue to comply with the fiscal framework. For this purpose, GM-TAX TCM has implemented a procedure for systematic and ongoing monitoring of new or amended tax regulations and requirements – referred to as TCM legislation screening – for Commerzbank AG in Germany, including the domestic subsidiaries of Commerzbank AG for which GM-TAX provides tax advice. For this, their relevance and materiality with respect to Commerzbank AG (Germany) is assessed and the results are used to derive potential adaptation actions. The results of the analysis and the necessary adaptation actions are documented. In addition to the ongoing legislation screening and regular internal discussions within GM-TAX TCM, information is shared quarterly – and on an ad-hoc basis if necessary – between Group Tax divisions within the framework of the GM-TAX Responsibility Board.

This is linked to the Group-wide regulatory screening performed by the MaRisk compliance function in that, firstly, the analysis with regard to relevance and materiality is carried out in TCM's own database, and secondly, in the case of changes with a bearing on implementation, further implementation is tracked using tools under the instruction of the Group Compliance (GRM-CO) MaRisk Compliance unit.

The legislation screening performed by GM-TAX TCM covers Commerzbank AG in Germany. The scope is also extended to the international branches for regulatory screening, which is the responsibility of Group Compliance (MaRisk Compliance). Group Tax was assigned a screening function for the legal topic "tax law" in coordination with Group Compliance MaRisk Compliance; this is recorded in the procedure "Implementing the MaRisk compliance function in accordance with MaRisk AT 4.4.2". This also results in substantive responsibility (tax types) as well as local responsibility with regard to international tax issues. The specific contact persons for screening at Commerzbank AG in Germany and tier-1 locations were likewise determined in coordination with GRM-CO MaRisk Compliance and are specified on the intranet page "MaRisk compliance function".

Country-specific tax reporting

Information on Commerzbank's tax burden can be found in this Annual Report in the Notes to the financial statements under Note (67) Country-specific reporting.

Targets related to tax transparency and tax compliance

The tax compliance targets are derived from Commerzbank's strategy, the Code of Conduct, the GM-TAX tax strategy and the results from analysing the regulatory environment. They provide the framework and tasks for the tax and tax compliance function, and also form the basis for assessing tax compliance risks, even if these are not measurable in the traditional sense. The primary goal in the context of tax compliance management is to ensure complete, correct and timely fulfilment of all tax obligations. Appropriate and effective implementation of a TCMS makes a decisive contribution to fulfilling the Bank's compliance targets.

	a	b	c	d	e	f	g	h	i	j
Disclosure reference date T										
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 transitional	Of which enabling		Of which Use of Proceeds	Of which enabling	
35	Loans and advances	50 059	X	X	X	X	X	X	X	X
	of which loans collateralised by commercial immovable property	9 025	X	X	X	X	X	X	X	X
36										
37	of which building renovation loans	291	X	X	X	X	X	X	X	X
38	Debt securities	30 589	X	X	X	X	X	X	X	X
39	Equity instruments	574	X	X	X	X	X	X	X	X
	Non-EU country counterparties not subject to NFRD disclosure obligations	90 969	X	X	X	X	X	X	X	X
40										
41	Loans and advances	70 642	X	X	X	X	X	X	X	X
42	Debt securities	20 165	X	X	X	X	X	X	X	X
43	Equity instruments	162	X	X	X	X	X	X	X	X
44	Derivatives	1 280	X	X	X	X	X	X	X	X
45	On demand interbank loans	117	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	1 078	X	X	X	X	X	X	X	X
47	Other categories of assets (e.g. Goodwill, commodities etc.)	10 395	X	X	X	X	X	X	X	X
48	Total GAR assets	422 685	151 051	14 066	12 389	251	520	600	15	8
49	Assets not covered for GAR calculation	152 544	X	X	X	X	X	X	X	X
50	Central governments and Supranational issuers	35 334	X	X	X	X	X	X	X	X
51	Central banks exposure	82 653	X	X	X	X	X	X	X	X
52	Trading book	34 557	X	X	X	X	X	X	X	X
53	Total assets	575 229	151 051	14 066	12 389	251	520	600	15	8
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations										
54	Financial guarantees	1 223	144	16	-	0	13	2	0	-
55	Assets under management	53 057	27 841	5 043	4 620	11	283	69	2	1
56	Of which debt securities	43 244	26 570	4 362	4 110	9	163	49	1	0
57	Of which equity instruments	6 829	1 271	682	510	2	121	20	1	0

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	k	l	m	n	o	p	q	r
Disclosure reference date T								
Based on the Turnover KPI	Water and marine resources (WTR)			Circular economy (CE)				
million €	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 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
Loans and advances, debt securities and equity Instruments not HFT eligible for GAR calculation	14	-	-	-	273	-	-	-
1 Financial undertakings	0	-	-	-	76	-	-	-
3 Credit institutions	0	-	-	-	0	-	-	-
4 Loans and advances	0	-	-	-	0	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	0	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	76	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	14	-	-	-	197	-	-	-
21 Loans and advances	8	-	-	-	143	-	-	-
22 Debt securities, including UoP ¹	6	-	-	-	55	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
25 of which loans collateralised by commercial immovable property ²	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
35 Loans and advances	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
37 of which building renovation loans	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X
39 Equity instruments	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
41 Loans and advances	X	X	X	X	X	X	X	X

		k	l	m	n	o	p	q	r
Disclosure reference date T									
Based on the Turnover KPI	million €	Water and marine resources (WTR)			Circular economy (CE)				
		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 enabling			Of which Use of Proceeds	Of which enabling
42	Debt securities	X	X	X	X	X	X	X	X
43	Equity instruments	X	X	X	X	X	X	X	X
44	Derivatives	X	X	X	X	X	X	X	X
45	On demand interbank loans	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	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	14	-	-	-	273	-	-	-
49	Assets not covered for GAR calculation	X	X	X	X	X	X	X	X
50	Central governments and Supranational issuers	X	X	X	X	X	X	X	X
51	Central banks exposure	X	X	X	X	X	X	X	X
52	Trading book	X	X	X	X	X	X	X	X
53	Total assets	14	-	-	-	273	-	-	-
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations									
54	Financial guarantees	1	-	-	-	11	-	-	-
55	Assets under management	3	-	-	-	101	-	-	-
56	Of which debt securities	0	-	-	-	13	-	-	-
57	Of which equity instruments	3	-	-	-	87	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	s	t	u	v	w	x	y	z
Disclosure reference date T								
Based on the Turnover KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
million €	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 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
Loans and advances, debt securities and equity Instruments not HfT eligible for GAR calculation	34	-	-	-	16	-	-	-
1 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	34	-	-	-	16	-	-	-
21 Loans and advances	13	-	-	-	12	-	-	-
22 Debt securities, including UoP ¹	21	-	-	-	3	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
of which loans collateralised by commercial immovable property ²	X	X	X	X	X	X	X	X
26 of which building renovation loans	X	X	X	X	X	X	X	X
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
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
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
35 Loans and advances	X	X	X	X	X	X	X	X
of which loans collateralised by commercial immovable property	X	X	X	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X
39 Equity instruments	X	X	X	X	X	X	X	X
Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
40	X	X	X	X	X	X	X	X

		s	t	u	v	w	x	y	z
Disclosure reference date T									
Based on the Turnover KPI		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
million €									
41	Loans and advances	X	X	X	X	X	X	X	X
42	Debt securities	X	X	X	X	X	X	X	X
43	Equity instruments	X	X	X	X	X	X	X	X
44	Derivatives	X	X	X	X	X	X	X	X
45	On demand interbank loans	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	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	34	0	-	-	16	-	-	-
49	Assets not covered for GAR calculation	X	X	X	X	X	X	X	X
50	Central governments and Supranational issuers	X	X	X	X	X	X	X	X
51	Central banks exposure	X	X	X	X	X	X	X	X
52	Trading book	X	X	X	X	X	X	X	X
53	Total assets	34	0	-	-	16	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations									
54	Financial guarantees	1	-	-	-	0	-	-	-
55	Assets under management	92	-	-	-	0	-	-	-
56	Of which debt securities	30	-	-	-	0	-	-	-
57	Of which equity instruments	61	-	-	-	0	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	ab	ac	ad	ae	af
Disclosure reference date T					
Based on the Turnover KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	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
GAR - Covered assets in both numerator and denominator	-	-	-	-	-
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	151 987	14 081	12 389	251	528
1 Financial undertakings	15 086	1 228	133	99	131
2 Credit institutions	13 534	1 034	-	98	86
4 Loans and advances	8 278	631	-	61	42
5 Debt securities, including UoP ¹	5 256	403	-	38	44
6 Equity instruments	-	-	X	-	-
7 Other financial corporations	1 552	194	133	1	45
8 of which investment firms	0	0	-	0	0
9 Loans and advances	0	0	-	0	0
10 Debt securities, including UoP ¹	-	-	-	-	-
11 Equity instruments	-	-	X	-	-
12 of which management companies	0	0	-	0	0
13 Loans and advances	0	0	-	0	0
14 Debt securities, including UoP ¹	-	-	-	-	-
15 Equity instruments	-	-	X	-	-
16 of which insurance undertakings	5	0	-	0	0
17 Loans and advances	5	0	-	0	0
18 Debt securities, including UoP ¹	-	-	-	-	-
19 Equity instruments	-	-	X	-	-
20 Non-financial undertakings	20 995	4 234	3 637	152	397
21 Loans and advances	20 311	3 978	3 637	26	223
22 Debt securities, including UoP ¹	683	256	-	125	174
23 Equity instruments	-	-	X	-	-
24 Households	115 892	8 619	8 619	-	-
of which loans collateralised by commercial immovable property ²	106 293	7 760	7 760	-	-
26 of which building renovation loans	3 628	-	-	-	-
27 of which motor vehicle loans	294	-	-	-	-
28 Local governments financing	14	-	-	-	-
29 Housing financing	-	-	-	-	-
30 Other local government financing	14	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
35 Loans and advances	X	X	X	X	X
of which loans collateralised by commercial immovable property	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X
38 Debt securities	X	X	X	X	X
39 Equity instruments	X	X	X	X	X
40 Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
41 Loans and advances	X	X	X	X	X
42 Debt securities	X	X	X	X	X
43 Equity instruments	X	X	X	X	X
44 Derivatives	X	X	X	X	X
45 On demand interbank loans	X	X	X	X	X
46 Cash and cash-related assets	X	X	X	X	X
47 Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X
48 Total GAR assets	151 987	14 081	12 389	251	528

	ab	ac	ad	ae	af
Disclosure reference date T					
Based on the Turnover KPI					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		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
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	151 987	14 081	12 389	251	528
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations					
54 Financial guarantees	159	16	-	0	13
55 Assets under management	28 106	5 045	4 620	11	284
56 Of which debt securities	26 664	4 362	4 110	9	163
57 Of which equity instruments	1 443	683	510	2	121

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

² 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 transitional			Of which Use of Proceeds	Of which enabling	
35	Loans and advances	77 823	X	X	X	X	X	X	X	X
	of which loans collateralised by commercial immovable property									
36		9 181	X	X	X	X	X	X	X	X
	of which building renovation loans									
37		340	X	X	X	X	X	X	X	X
38	Debt securities	34 448	X	X	X	X	X	X	X	X
39	Equity instruments	599	X	X	X	X	X	X	X	X
	Non-EU country counterparties not subject to NFRD disclosure obligations									
40		69 150	X	X	X	X	X	X	X	X
41	Loans and advances	50 970	X	X	X	X	X	X	X	X
42	Debt securities	18 061	X	X	X	X	X	X	X	X
43	Equity instruments	120	X	X	X	X	X	X	X	X
44	Derivatives	1 497	X	X	X	X	X	X	X	X
45	On demand interbank loans	131	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	1 108	X	X	X	X	X	X	X	X
	Other categories of assets (e.g. Goodwill, commodities etc.)									
47		10 257	X	X	X	X	X	X	X	X
48	Total GAR assets	372 436	130 733	8 713	8 488	29	159	11	8	0
	Assets not covered for									
49	GAR calculation	165 522	X	X	X	X	X	X	X	X
	Central governments and Supranational issuers									
50		37 568	X	X	X	X	X	X	X	X
51	Central banks exposure	101 396	X	X	X	X	X	X	X	X
52	Trading book	26 559	X	X	X	X	X	X	X	X
53	Total assets	537 959	130 733	8 713	8 488	29	159	11	8	0
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations										
54	Financial guarantees	3 093	36	1	-	0	1	-	-	-
55	Assets under management	46 194	23 509 ³	2 700	2 505 ⁴	2	117	6 ³	1	0
56	Of which debt securities	38 613	22 991	2 573	2 505	1	38	5	1	0
57	Of which equity instruments	4 910	518	127	-	1	79	1	0	0

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

³ The prior year 'of which' disclosure for taxonomy eligible AuM has been adjusted.

⁴ The prior year 'of which' disclosure for use of proceeds has been adjusted.

	aq	ar	as	at	au	av	aw	ax
Disclosure reference date T-1								
Based on the Turnover KPI	Water and marine resources (WTR)				Circular economy (CE)			
	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 enabling			
million €								
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	-	-	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
25 of which loans collateralised by commercial immovable property ²	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
35 Loans and advances	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
37 of which building renovation loans	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X
39 Equity instruments	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
41 Loans and advances	X	X	X	X	X	X	X	X
42 Debt securities	X	X	X	X	X	X	X	X
43 Equity instruments	X	X	X	X	X	X	X	X
44 Derivatives	X	X	X	X	X	X	X	X
45 On demand interbank loans	X	X	X	X	X	X	X	X
46 Cash and cash-related assets	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

	aq	ar	as	at	au	av	aw	ax
Disclosure reference date T-1								
Based on the Turnover KPI	Water and marine resources (WTR)				Circular economy (CE)			
	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 €		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
48 Total GAR assets	-	-	-	-	-	-	-	-
49 Assets not covered for GAR calculation	X	X	X	X	X	X	X	X
50 Central governments and Supranational issuers	X	X	X	X	X	X	X	X
51 Central banks exposure	X	X	X	X	X	X	X	X
52 Trading book	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	-	-	-	-	-	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	ay	az	ba	bb	bc	bd	be	bf
Disclosure reference date T-1								
Based on the Turnover KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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 enabling			Of which Use of Proceeds	Of which enabling
million €								
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-	-
1 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
of which loans collateralised by commercial immovable property ²	X	X	X	X	X	X	X	X
26 of which building renovation loans	X	X	X	X	X	X	X	X
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
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
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
35 Loans and advances	X	X	X	X	X	X	X	X
of which loans collateralised by commercial immovable property	X	X	X	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X
39 Equity instruments	X	X	X	X	X	X	X	X
Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
41 Loans and advances	X	X	X	X	X	X	X	X
42 Debt securities	X	X	X	X	X	X	X	X
43 Equity instruments	X	X	X	X	X	X	X	X
44 Derivatives	X	X	X	X	X	X	X	X
45 On demand interbank loans	X	X	X	X	X	X	X	X
46 Cash and cash-related assets	X	X	X	X	X	X	X	X
Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X	X	X	X

	ay	az	ba	bb	bc	bd	be	bf
Disclosure reference date T-1								
Based on the Turnover KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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 €			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
48 Total GAR assets	-	-	-	-	-	-	-	-
Assets not covered for GAR calculation	X	X	X	X	X	X	X	X
50 Central governments and Supranational issuers	X	X	X	X	X	X	X	X
51 Central banks exposure	X	X	X	X	X	X	X	X
52 Trading book	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	-	-	-	-	-	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	bg	bh	bi	bj	bk
Disclosure reference date T-1					
Based on the Turnover KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
million €			Of which Use of Proceeds	Of which transitional	Of which enabling
GAR - Covered assets in both numerator and denominator	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	130 744	8 721	8 488	29	159
1 Financial undertakings	3 963	58	58	-	0
3 Credit institutions	2 883	-	-	-	-
4 Loans and advances	1 608	-	-	-	-
5 Debt securities, including UoP ¹	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 ¹	-	-	-	-	-
11 Equity instruments	-	-	X	-	-
12 of which management companies	155	-	-	-	-
13 Loans and advances	155	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-
15 Equity instruments	-	-	X	-	-
16 of which insurance undertakings	4	-	-	-	-
17 Loans and advances	4	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-
19 Equity instruments	-	-	X	-	-
20 Non-financial undertakings	12 881	3 225	2 991	29	159
21 Loans and advances	12 586	3 183	2 991	22	145
22 Debt securities, including UoP ¹	295	42	-	7	14
23 Equity instruments	-	-	X	-	-
24 Households	113 883	5 438	5 438	-	-
25 of which loans collateralised by commercial immovable property ²	103 857	4 673	4 673	-	-
26 of which building renovation loans	3 758	-	-	-	-
27 of which motor vehicle loans	98	-	-	-	-
28 Local governments financing	17	-	-	-	-
29 Housing financing	-	-	-	-	-
30 Other local government financing	17	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
35 Loans and advances	X	X	X	X	X
36 of which loans collateralised by commercial immovable property	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X
38 Debt securities	X	X	X	X	X
39 Equity instruments	X	X	X	X	X
40 Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
41 Loans and advances	X	X	X	X	X
42 Debt securities	X	X	X	X	X
43 Equity instruments	X	X	X	X	X
44 Derivatives	X	X	X	X	X
45 On demand interbank loans	X	X	X	X	X
46 Cash and cash-related assets	X	X	X	X	X
47 Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X

	bg	bh	bi	bj	bk
Disclosure reference date T-1					
Based on the Turnover KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
million €			Of which Use of Proceeds	Of which transitional	Of which enabling
48 Total GAR assets	130 744	8 721	8 488	29	159
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	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	23 510 ³	2 701	2 505 ⁴	2	117
56 Of which debt securities	22 991	2 574	2 505	2	38
57 Of which equity instruments	518	127	-	1	79

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

³ The prior year 'of which' disclosure for taxonomy eligible AuM has been adjusted.

⁴ The prior year 'of which' disclosure for use of proceeds has been adjusted.

Disclosure reference date T		a	b	c	d	e	f	g	h	i	j
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	
36	of which loans collateralised by commercial immovable property	9 025	X	X	X	X	X	X	X	X	X
37	of which building renovation loans	291	X	X	X	X	X	X	X	X	X
38	Debt securities	30 589	X	X	X	X	X	X	X	X	X
39	Equity instruments	574	X	X	X	X	X	X	X	X	X
40	Non-EU country counterparties not subject to NFRD disclosure obligations	90 969	X	X	X	X	X	X	X	X	X
41	Loans and advances	70 642	X	X	X	X	X	X	X	X	X
42	Debt securities	20 165	X	X	X	X	X	X	X	X	X
43	Equity instruments	162	X	X	X	X	X	X	X	X	X
44	Derivatives	1 280	X	X	X	X	X	X	X	X	X
45	On demand interbank loans	117	X	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	1 078	X	X	X	X	X	X	X	X	X
47	Other categories of assets (e.g. Goodwill, commodities etc.)	10 395	X	X	X	X	X	X	X	X	X
48	Total GAR assets	422 685	150 897	15 086	12 389	255	1 052	808	75	-	32
49	Assets not covered for GAR calculation	152 544	X	X	X	X	X	X	X	X	X
50	Central governments and Supranational issuers	35 334	X	X	X	X	X	X	X	X	X
51	Central banks exposure	82 653	X	X	X	X	X	X	X	X	X
52	Trading book	34 557	X	X	X	X	X	X	X	X	X
53	Total assets	575 229	150 897	15 086	12 389	255	1 052	808	75	-	32
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations											
54	Financial guarantees	1 223	168	20	-	1	14	5	0	-	0
55	Assets under management	53 057	28 227	5 400	4 620	24	472	128	4	-	1
56	Of which debt securities	43 244	26 687	4 525	4 110	19	280	92	1	-	0
57	Of which equity instruments	6 829	1 541	875	510	5	191	37	3	-	1

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	k	l	m	n	o	p	q	r
Disclosure reference date T								
Based on the CapEx KPI	Water and marine resources (WTR)			Circular economy (CE)				
	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 Use of Proceeds				
million €								
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	15	-	-	-	463	-	-	-
2 Financial undertakings	0	-	-	-	149	-	-	-
3 Credit institutions	0	-	-	-	0	-	-	-
4 Loans and advances	0	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	0	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	148	-	-	-
8 of which investment firms	-	-	-	-	0	-	-	-
9 Loans and advances	-	-	-	-	0	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	15	-	-	-	315	-	-	-
21 Loans and advances	6	-	-	-	277	-	-	-
22 Debt securities, including UoP ¹	8	-	-	-	38	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
25 of which loans collateralised by commercial immovable property ²	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
35 Loans and advances	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
37 of which building renovation loans	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X
39 Equity instruments	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
41 Loans and advances	X	X	X	X	X	X	X	X

		k	l	m	n	o	p	q	r
Disclosure reference date T									
Based on the CapEx KPI		Water and marine resources (WTR)				Circular economy (CE)			
		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 enabling			Of which Use of Proceeds	Of which enabling
million €									
42	Debt securities	X	X	X	X	X	X	X	X
43	Equity instruments	X	X	X	X	X	X	X	X
44	Derivatives	X	X	X	X	X	X	X	X
45	On demand interbank loans	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	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	15	-	-	-	463	-	-	-
49	Assets not covered for GAR calculation	X	X	X	X	X	X	X	X
50	Central governments and Supranational issuers	X	X	X	X	X	X	X	X
51	Central banks exposure	X	X	X	X	X	X	X	X
52	Trading book	X	X	X	X	X	X	X	X
53	Total assets	15	-	-	-	463	-	-	-
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations									
54	Financial guarantees	1	-	-	-	6	-	-	-
55	Assets under management	4	-	-	-	56	-	-	-
56	Of which debt securities	1	-	-	-	11	-	-	-
57	Of which equity instruments	3	-	-	-	45	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	s	t	u	v	w	x	z	aa
Disclosure reference date T								
Based on the CapEx KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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 enabling		Of which Use of Proceeds		Of which enabling	
million €								
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	25	-	-	-	9	-	-	-
1 Financial undertakings	0	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	0	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	25	-	-	-	9	-	-	-
21 Loans and advances	15	-	-	-	7	-	-	-
22 Debt securities, including UoP ¹	11	-	-	-	2	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
25 of which loans collateralised by commercial immovable property ²	X	X	X	X	X	X	X	X
26 of which building renovation loans	X	X	X	X	X	X	X	X
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
35 Loans and advances	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
37 of which building renovation loans	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X
39 Equity instruments	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
41 Loans and advances	X	X	X	X	X	X	X	X

		s	t	u	v	w	x	z	aa
Disclosure reference date T									
Based on the CapEx KPI		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		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 enabling			Of which Use of Proceeds	Of which enabling
million €									
42	Debt securities	X	X	X	X	X	X	X	X
43	Equity instruments	X	X	X	X	X	X	X	X
44	Derivatives	X	X	X	X	X	X	X	X
45	On demand interbank loans	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	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	25	-	-	-	9	-	-	-
49	Assets not covered for GAR calculation	X	X	X	X	X	X	X	X
50	Central governments and Supranational issuers	X	X	X	X	X	X	X	X
51	Central banks exposure	X	X	X	X	X	X	X	X
52	Trading book	X	X	X	X	X	X	X	X
53	Total assets	25	-	-	-	9	-	-	-
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations									
54	Financial guarantees	0	-	-	-	0	-	-	-
55	Assets under management	54	-	-	-	0	-	-	-
56	Of which debt securities	12	-	-	-	0	-	-	-
57	Of which equity instruments	42	-	-	-	0	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	ab	ac	ad	ae	af
Disclosure reference date T					
Based on the CapEx KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	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
GAR - Covered assets in both numerator and denominator	X	X	X	X	X
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	152 218	15 161	12 389	255	1 083
1 Financial undertakings	14 040	1 422	133	124	282
3 Credit institutions	12 360	1 091	-	99	157
4 Loans and advances	7 898	680	-	75	82
5 Debt securities, including UoP ¹	4 463	412	-	24	76
6 Equity instruments	-	-	X	-	-
7 Other financial corporations	1 680	331	133	25	124
8 of which investment firms	0	0	-	0	0
9 Loans and advances	0	0	-	0	0
10 Debt securities, including UoP ¹	-	-	-	-	-
11 Equity instruments	-	-	X	-	-
12 of which management companies	0	0	-	0	0
13 Loans and advances	0	0	-	0	0
14 Debt securities, including UoP ¹	-	-	-	-	-
15 Equity instruments	-	-	X	-	-
16 of which insurance undertakings	5	0	-	0	0
17 Loans and advances	5	0	-	0	0
18 Debt securities, including UoP ¹	-	-	-	-	-
19 Equity instruments	-	-	X	-	-
20 Non-financial undertakings	22 272	5 119	3 637	130	802
21 Loans and advances	21 352	4 623	3 637	76	502
22 Debt securities, including UoP ¹	919	496	-	54	300
23 Equity instruments	-	-	X	-	-
24 Households	115 892	8 619	8 619	-	-
25 of which loans collateralised by commercial immovable property ²	106 293	7 760	7 760	-	-
26 of which building renovation loans	3 628	-	-	-	-
27 of which motor vehicle loans	294	-	-	-	-
28 Local governments financing	14	-	-	-	-
29 Housing financing	-	-	-	-	-
30 Other local government financing	14	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
35 Loans and advances	X	X	X	X	X
36 of which loans collateralised by commercial immovable property	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X
38 Debt securities	X	X	X	X	X
39 Equity instruments	X	X	X	X	X
40 Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
41 Loans and advances	X	X	X	X	X
42 Debt securities	X	X	X	X	X
43 Equity instruments	X	X	X	X	X

		ab	ac	ad	ae	af
Disclosure reference date T						
Based on the CapEx KPI		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		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
44	Derivatives	X	X	X	X	X
45	On demand interbank loans	X	X	X	X	X
46	Cash and cash-related assets	X	X	X	X	X
47	Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X
48	Total GAR assets	152 218	15 161	12 389	255	1 083
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	152 218	15 161	12 389	255	1 083
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations						
54	Financial guarantees	180	20	-	1	14
55	Assets under management	28 471	5 404	4 620	24	473
56	Of which debt securities	26 802	4 527	4 110	19	281
57	Of which equity instruments	1 668	878	510	5	192

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

² 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 CapEx KPI		Total [gross] carrying amount	Climate Change Mitigation (CCM) Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Climate Change Adaptation (CCA) Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
million €			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Pro- ceeds	Of which transi- tional	Of which enabling			Of which Use of Pro- ceeds	Of which enabling	
35	Loans and advances	77 823	X	X	X	X	X	X	X	X	X
36	of which loans collateral- ised by commercial immovable property	9 181	X	X	X	X	X	X	X	X	X
37	of which building reno- vation 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 counter- parties 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
44	Derivatives	1 497	X	X	X	X	X	X	X	X	X
45	On demand interbank loans	131	X	X	X	X	X	X	X	X	X
46	Cash and cash-related assets	1 108	X	X	X	X	X	X	X	X	X
47	Other categories of assets (e.g. Goodwill, commodities etc.)	10 257	X	X	X	X	X	X	X	X	X
48	Total GAR assets	372 436	131 405	9 034	8 488	45	322	11	6	-	0
49	Assets not covered for GAR calculation	165 522	X	X	X	X	X	X	X	X	X
50	Central governments and Su- pranational 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
53	Total assets	537 959	131 405	9 034	8 488	45	322	11	6	-	0
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations											
54	Financial guarantees	3 093	42	3	-	1	2	-	-	-	-
55	Assets under management	46 194	23 960 ³	3 067	2 505 ⁴	11	300	6 ³	1	-	0
56	Of which debt securities	38 613	23 164	2 729	2 505	8	123	5	0	-	0
57	Of which equity instruments	4 910	796	339	-	2	177	1	0	-	0

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

³ The prior year 'of which' disclosure for taxonomy eligible AuM has been adjusted.

⁴ The prior year 'of which' disclosure for use of proceeds has been adjusted.

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	aq	ar	as	at	au	av	aw	ax
Disclosure reference date T-1								
Based on the CapEx KPI	Water and marine resources (WTR)				Circular economy (CE)			
	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 Use of Proceeds			
million €								
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
of which loans collateralised by commercial immovable property ²	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
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
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X	X
35 Loans and advances	X	X	X	X	X	X	X	X
of which loans collateralised by commercial immovable property	X	X	X	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X	X	X	X
38 Debt securities	X	X	X	X	X	X	X	X
39 Equity instruments	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
41 Loans and advances	X	X	X	X	X	X	X	X
42 Debt securities	X	X	X	X	X	X	X	X
43 Equity instruments	X	X	X	X	X	X	X	X
44 Derivatives	X	X	X	X	X	X	X	X
45 On demand interbank loans	X	X	X	X	X	X	X	X
46 Cash and cash-related assets	X	X	X	X	X	X	X	X
Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X	X	X	X
48 Total GAR assets	-	-	-	-	-	-	-	-

	aq	ar	as	at	au	av	aw	ax
Disclosure reference date T-1								
Based on the CapEx KPI	Water and marine resources (WTR)				Circular economy (CE)			
	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 €			Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling
Assets not covered for GAR calculation	X	X	X	X	X	X	X	X
50 Central governments and Supranational issuers	X	X	X	X	X	X	X	X
51 Central banks exposure	X	X	X	X	X	X	X	X
52 Trading book	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	-	-	-	-	-	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	ay	az	ba	bb	bc	bd	be	bf
Disclosure reference date T-1								
Based on the CapEx KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
million €		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)		
			Of which Use of Proceeds	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
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-
5	Debt securities, including UoP ¹	-	-	-	-	-	-	-
6	Equity instruments	-	-	X	-	-	X	-
7	Other financial corporations	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-
10	Debt securities, including UoP ¹	-	-	-	-	-	-	-
11	Equity instruments	-	-	X	-	-	X	-
12	of which management companies	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-
14	Debt securities, including UoP ¹	-	-	-	-	-	-	-
15	Equity instruments	-	-	X	-	-	X	-
16	of which insurance undertakings	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-
18	Debt securities, including UoP ¹	-	-	-	-	-	-	-
19	Equity instruments	-	-	X	-	-	X	-
20	Non-financial undertakings	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-
22	Debt securities, including UoP ¹	-	-	-	-	-	-	-
23	Equity instruments	-	-	X	-	-	X	-
24	Households	X	X	X	X	X	X	X
25	of which loans collateralised by commercial immovable property ²	X	X	X	X	X	X	X
26	of which building renovation loans	X	X	X	X	X	X	X
27	of which motor vehicle loans	X	X	X	X	X	X	X
28	Local governments financing	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-
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
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X	X	X
35	Loans and advances	X	X	X	X	X	X	X
36	of which loans collateralised by commercial immovable property	X	X	X	X	X	X	X
37	of which building renovation loans	X	X	X	X	X	X	X
38	Debt securities	X	X	X	X	X	X	X
39	Equity instruments	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
41	Loans and advances	X	X	X	X	X	X	X
42	Debt securities	X	X	X	X	X	X	X
43	Equity instruments	X	X	X	X	X	X	X
44	Derivatives	X	X	X	X	X	X	X
45	On demand interbank loans	X	X	X	X	X	X	X
46	Cash and cash-related assets	X	X	X	X	X	X	X
47	Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X	X	X
48	Total GAR assets	-	-	-	-	-	-	-

	ay	az	ba	bb	bc	bd	be	bf
Disclosure reference date T-1								
Based on the CapEx KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
million €		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds
		Assets not covered for GAR calculation						
49	Central governments and Supranational issuers	X	X	X	X	X	X	X
50	Central banks exposure	X	X	X	X	X	X	X
51	Trading book	X	X	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	-	-	-	-	-	-	-

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

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	bg	bh	bi	bj	bk
Disclosure reference date T-1					
Based on the CapEx KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
million €					
GAR - Covered assets in both numerator and denominator	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	131 416	9 040	8 488	45	323
2 Financial undertakings	3 937	58	58	0	0
3 Credit institutions	2 856	-	-	-	-
4 Loans and advances	1 616	-	-	-	-
5 Debt securities, including UoP ¹	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 ¹	-	-	-	-	-
11 Equity instruments	-	-	X	-	-
12 of which management companies	155	-	-	-	-
13 Loans and advances	155	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-
15 Equity instruments	-	-	X	-	-
16 of which insurance undertakings	4	-	-	-	-
17 Loans and advances	4	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-
19 Equity instruments	-	-	X	-	-
20 Non-financial undertakings	13 579	3 544	2 991	45	323
21 Loans and advances	13 230	3 460	2 991	29	296
22 Debt securities, including UoP ¹	349	83	-	16	27
23 Equity instruments	-	-	X	-	-
24 Households	113 883	5 438	5 438	-	-
of which loans collateralised by commercial immovable property ²	103 857	4 673	4 673	-	-
26 of which building renovation loans	3 758	-	-	-	-
27 of which motor vehicle loans	98	-	-	-	-
28 Local governments financing	17	-	-	-	-
29 Housing financing	-	-	-	-	-
30 Other local government financing	17	-	-	-	-
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
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	X	X	X	X	X
35 Loans and advances	X	X	X	X	X
of which loans collateralised by commercial immovable property	X	X	X	X	X
37 of which building renovation loans	X	X	X	X	X
38 Debt securities	X	X	X	X	X
39 Equity instruments	X	X	X	X	X
Non-EU country counterparties not subject to NFRD disclosure obligations	X	X	X	X	X
41 Loans and advances	X	X	X	X	X
42 Debt securities	X	X	X	X	X
43 Equity instruments	X	X	X	X	X
44 Derivatives	X	X	X	X	X
45 On demand interbank loans	X	X	X	X	X
46 Cash and cash-related assets	X	X	X	X	X
47 Other categories of assets (e.g. Goodwill, commodities etc.)	X	X	X	X	X

	bg	bh	bi	bj	bk
Disclosure reference date T-1					
Based on the CapEx KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	million €		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
			Of which Use of Proceeds	Of which transitional	Of which enabling
48 Total GAR assets	131 416	9 040	8 488	45	323
Assets not covered for GAR					
49 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	23 961 ³	3 068	2 505 ⁴	11	300
56 Of which debt securities	23 165	2 729	2 505	8	123
57 Of which equity instruments	796	339	-	3	177

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

² Line 25 shows only loans secured by real estate with collateral eligible for regulatory purposes.

³ The prior year 'of which' disclosure for taxonomy eligible AuM has been adjusted.

⁴ The prior year 'of which' disclosure for Use of Proceeds has been adjusted.

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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	
Breakdown by sector – NACE 4 digits level (code and label) ¹		[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)
1	01.30 Plant propagation	0.4	-	X	X	-	-	X	X
2	01.50 Mixed farming	16.2	-	X	X	-	-	X	X
3	01.61 Support activities for crop production	0.5	-	X	X	-	-	X	X
4	01.63 Post-harvest crop activities	3.3	-	X	X	-	-	X	X
5	02.40 Support services to forestry	0.1	-	X	X	-	-	X	X
6	06.10 Extraction of crude petroleum	3.2	0.6	X	X	-	-	X	X
7	07.29 Mining of other non-ferrous metal ores	0.4	-	X	X	-	-	X	X
8	08.12 Operation of gravel and sand pits; mining of clays and kaolin	1.0	0.4	X	X	-	-	X	X
9	10.13 Production of meat and poultry meat products	0.5	-	X	X	0.5	-	X	X
10	10.39 Other processing and preserving of fruit and vegetables	3.2	-	X	X	-	-	X	X
11	10.51 Operation of dairies and cheese making	20.0	-	X	X	-	-	X	X
12	10.61 Manufacture of grain mill products	18.7	-	X	X	-	-	X	X
13	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	1.8	-	X	X	-	-	X	X
14	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	0.3	-	X	X	-	-	X	X
15	10.82 Manufacture of cocoa, chocolate and sugar confectionery	0.2	-	X	X	-	-	X	X
16	10.86 Manufacture of homogenised food preparations and dietetic food	0.6	-	X	X	-	-	X	X
17	10.89 Manufacture of other food products n.e.c.	0.1	-	X	X	0.0	-	X	X
18	11.01 Distilling, rectifying and blending of spirits	0.9	-	X	X	-	-	X	X
19	11.05 Manufacture of beer	31.9	-	X	X	-	-	X	X
20	13.99 Manufacture of other textiles n.e.c.	0.2	-	X	X	-	-	X	X
21	14.19 Manufacture of other wearing apparel and accessories	47.1	-	X	X	-	-	X	X
22	16.21 Manufacture of veneer sheets and wood-based panels	30.3	-	X	X	-	-	X	X
23	16.23 Manufacture of other builders' carpentry and joinery	0.9	0.0	X	X	-	-	X	X
24	16.24 Manufacture of wooden containers	10.6	-	X	X	-	-	X	X
25	16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.2	0.0	X	X	-	-	X	X
26	17.12 Manufacture of paper and paperboard	0.6	0.3	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 Breakdown by sector – NACE 4 digits level (code and label) ¹	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)
27 17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	2.9	0.5	X	X	-	-	X	X
28 17.23 Manufacture of paper stationery	1.4	-	X	X	-	-	X	X
29 18.12 Other printing	18.0	-	X	X	-	-	X	X
30 18.13 Pre-press and pre-media services	0.6	-	X	X	-	-	X	X
31 19.20 Manufacture of refined petroleum products	28.4	0.3	X	X	-	-	X	X
32 20.13 Manufacture of other inorganic basic chemicals	0.4	0.1	X	X	-	-	X	X
33 20.15 Manufacture of fertilisers and nitrogen compounds	0.2	0.0	X	X	-	-	X	X
34 20.16 Manufacture of plastics in primary forms	6.9	-	X	X	0.2	-	X	X
35 20.17 Manufacture of synthetic rubber in primary forms	13.0	-	X	X	-	-	X	X
36 20.20 Manufacture of pesticides and other agrochemical products	0.9	-	X	X	-	-	X	X
37 20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.3	0.1	X	X	-	-	X	X
38 20.59 Manufacture of other chemical products n.e.c.	63.8	0.5	X	X	0.0	-	X	X
39 20.60 Manufacture of man-made fibres	64.8	0.0	X	X	-	-	X	X
40 21.10 Manufacture of basic pharmaceutical products	4.3	0.0	X	X	-	-	X	X
41 21.20 Manufacture of pharmaceutical preparations	86.8	0.0	X	X	-	-	X	X
42 22.21 Manufacture of plastic plates, sheets, tubes and profiles	0.5	0.2	X	X	-	-	X	X
43 22.22 Manufacture of plastic packing goods	9.7	1.1	X	X	0.9	-	X	X
44 22.23 Manufacture of builders' ware of plastic	5.4	-	X	X	-	-	X	X
45 22.29 Manufacture of other plastic products	2.4	0.0	X	X	0.0	-	X	X
46 23.11 Manufacture of flat glass	1.0	1.0	X	X	-	-	X	X
47 23.14 Manufacture of glass fibres	2.1	-	X	X	-	-	X	X
48 23.19 Manufacture and processing of other glass, including technical glassware	0.1	-	X	X	-	-	X	X
49 23.20 Manufacture of refractory products	0.1	-	X	X	-	-	X	X
50 23.32 Manufacture of bricks, tiles and construction products, in baked clay	10.1	7.1	X	X	-	-	X	X
51 23.44 Manufacture of other technical ceramic products	0.3	-	X	X	-	-	X	X
52 23.51 Manufacture of cement	40.7	1.9	X	X	-	-	X	X
53 23.61 Manufacture of concrete products for construction purposes	0.1	0.0	X	X	-	-	X	X

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Based on the Turnover KPI Breakdown by sector – NACE 4 digits level (code and label) ¹	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)	
54	24.10 Manufacture of basic iron and steel and of ferro-alloys	65.2	4.6	X	X	21.5	-	X	X
55	24.34 Cold drawing of wire	2.1	-	X	X	-	-	X	X
56	24.41 Precious metals production	9.6	9.6	X	X	-	-	X	X
57	24.42 Aluminium production	0.7	-	X	X	-	-	X	X
58	24.51 Casting of iron	0.3	-	X	X	-	-	X	X
59	24.52 Casting of steel	0.1	0.1	X	X	-	-	X	X
60	24.53 Casting of light metals	0.1	0.0	X	X	-	-	X	X
61	25.11 Manufacture of metal structures and parts of structures	35.1	4.2	X	X	15.3	-	X	X
62	25.12 Manufacture of doors and windows of metal	1.5	0.6	X	X	-	-	X	X
63	25.21 Manufacture of central heating radiators and boilers	31.2	-	X	X	-	-	X	X
64	25.40 Manufacture of weapons and ammunition	2.2	0.0	X	X	0.0	-	X	X
65	25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	1.7	0.0	X	X	0.0	-	X	X
66	25.61 Treatment and coating of metals	0.8	-	X	X	-	-	X	X
67	25.62 Machining	1.8	0.4	X	X	-	-	X	X
68	25.71 Manufacture of cutlery	0.1	-	X	X	-	-	X	X
69	25.73 Manufacture of tools	0.1	-	X	X	-	-	X	X
70	25.99 Manufacture of other fabricated metal products n.e.c.	8.8	1.5	X	X	-	-	X	X
71	26.11 Manufacture of electronic components	4.1	0.6	X	X	0.0	-	X	X
72	26.20 Manufacture of computers and peripheral equipment	11.5	0.0	X	X	0.0	-	X	X
73	26.51 Manufacture of instruments and appliances for measuring, testing and navigation	89.1	0.0	X	X	0.0	-	X	X
74	26.70 Manufacture of optical instruments and photographic equipment	28.3	0.6	X	X	-	-	X	X
75	27.11 Manufacture of electric motors, generators and transformers	6.7	3.1	X	X	-	-	X	X
76	27.12 Manufacture of electricity distribution and control apparatus	65.1	52.4	X	X	0.0	-	X	X
77	27.20 Manufacture of batteries and accumulators	3.3	-	X	X	-	-	X	X
78	27.32 Manufacture of other electronic and electric wires and cables	0.1	0.1	X	X	0.0	-	X	X
79	27.40 Manufacture of electric lighting equipment	125.8	1.6	X	X	-	-	X	X
80	27.52 Manufacture of non-electric domestic appliances	0.2	-	X	X	-	-	X	X
81	27.90 Manufacture of other electrical equipment	31.5	1.5	X	X	-	-	X	X
82	28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	18.5	10.2	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) ¹	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)
83 28.15 Manufacture of bearings, gears, gearing and driving elements	0.3	-	X	X	-	-	X	X
84 28.21 Manufacture of ovens, furnaces and furnace burners	0.4	0.0	X	X	-	-	X	X
85 28.22 Manufacture of lifting and handling equipment	0.7	0.4	X	X	0.6	-	X	X
86 28.29 Manufacture of other general-purpose machinery n.e.c.	1.3	0.0	X	X	0.0	-	X	X
87 28.30 Manufacture of agricultural and forestry machinery	19.1	0.0	X	X	-	-	X	X
88 28.41 Manufacture of metal forming machinery	0.8	0.0	X	X	0.1	-	X	X
89 28.49 Manufacture of other machine tools	2.8	0.1	X	X	0.0	-	X	X
90 28.91 Manufacture of machinery for metallurgy	6.8	0.5	X	X	0.6	-	X	X
91 28.92 Manufacture of machinery for mining, quarrying and construction	2.3	-	X	X	-	-	X	X
92 28.93 Manufacture of machinery for food, beverage and tobacco processing	12.6	1.4	X	X	-	-	X	X
93 28.94 Manufacture of machinery for textile, apparel and leather production	0.1	0.1	X	X	-	-	X	X
94 28.95 Manufacture of machinery for paper and paperboard production	31.3	1.9	X	X	1.1	-	X	X
95 28.99 Manufacture of other special-purpose machinery n.e.c.	5.9	2.7	X	X	0.6	-	X	X
96 29.10 Manufacture of motor vehicles	381.3	39.7	X	X	20.2	3.6	X	X
97 29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	52.5	-	X	X	42.8	-	X	X
98 29.31 Manufacture of electrical and electronic equipment for motor vehicles	20.4	0.0	X	X	-	-	X	X
99 29.32 Manufacture of other parts and accessories for motor vehicles	5.3	5.3	X	X	0.0	0.0	X	X
100 30.20 Manufacture of railway locomotives and rolling stock	65.3	21.8	X	X	-	-	X	X
101 30.30 Manufacture of air and spacecraft and related machinery	32.2	0.0	X	X	0.0	-	X	X
102 30.99 Manufacture of other transport equipment n.e.c.	15.8	-	X	X	-	-	X	X
103 31.09 Manufacture of other furniture	0.5	-	X	X	-	-	X	X
104 32.40 Manufacture of games and toys	0.1	-	X	X	-	-	X	X
105 32.50 Manufacture of medical and dental instruments and supplies	92.1	-	X	X	-	-	X	X
106 32.99 Other manufacturing n.e.c.	6.3	0.0	X	X	-	-	X	X
107 33.12 Repair of machinery	0.1	0.1	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)	
108	33.13 Repair of electronic and optical equipment	1.1	-	X	X	-	-	X	X
109	35.11 Production of electricity	6 686.0	3 648.6	X	X	14.0	1.1	X	X
110	35.12 Transmission of electricity	1.3	1.3	X	X	-	-	X	X
111	35.13 Distribution of electricity	3.2	1.5	X	X	0.0	0.0	X	X
112	35.23 Trade of gas through mains	0.9	0.8	X	X	-	-	X	X
113	35.30 Steam and air conditioning supply	2.9	2.9	X	X	-	-	X	X
114	36.00 Water collection, treatment and supply	15.4	14.3	X	X	0.1	0.0	X	X
115	38.11 Collection of non-hazardous waste	0.1	0.1	X	X	0.0	0.0	X	X
116	38.22 Treatment and disposal of hazardous waste	0.1	-	X	X	-	-	X	X
117	38.32 Recovery of sorted materials	6.0	0.0	X	X	0.0	0.0	X	X
118	39.00 Remediation activities and other waste management services	0.7	0.0	X	X	0.0	0.0	X	X
119	41.10 Development of building projects	59.5	0.0	X	X	0.8	-	X	X
120	41.20 Construction of residential and non-residential buildings	29.1	3.7	X	X	1.9	0.0	X	X
121	42.11 Construction of roads and motorways	20.4	10.2	X	X	0.0	-	X	X
122	42.12 Construction of railways and underground railways	5.8	0.0	X	X	-	-	X	X
123	42.21 Construction of utility projects for fluids	2.7	-	X	X	-	-	X	X
124	42.91 Construction of water projects	8.1	-	X	X	-	-	X	X
125	42.99 Construction of other civil engineering projects n.e.c.	43.0	4.0	X	X	5.5	0.2	X	X
126	43.12 Site preparation	2.5	0.5	X	X	0.0	0.0	X	X
127	43.21 Electrical installation	19.8	13.1	X	X	0.1	0.0	X	X
128	43.22 Plumbing, heat and air-conditioning installation	0.6	0.0	X	X	-	-	X	X
129	43.29 Other construction installation	44.1	28.6	X	X	-	-	X	X
130	43.91 Roofing activities	0.1	-	X	X	-	-	X	X
131	43.99 Other specialised construction activities n.e.c.	13.1	3.2	X	X	4.8	-	X	X
132	45.11 Sale of cars and light motor vehicles	0.5	0.0	X	X	-	-	X	X
133	45.19 Sale of other motor vehicles	0.4	0.0	X	X	0.0	-	X	X
134	45.20 Maintenance and repair of motor vehicles	3.1	-	X	X	-	-	X	X
135	45.31 Wholesale trade of motor vehicle parts and accessories	0.1	0.0	X	X	0.0	-	X	X
136	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	2.7	-	X	X	2.7	-	X	X
137	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	9.0	8.8	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	
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		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)
138	46.32 Wholesale of meat and meat products	0.1	-	X	X	-	-	X	X
139	46.39 Non-specialised wholesale of food, beverages and tobacco	10.2	0.0	X	X	-	-	X	X
140	46.42 Wholesale of clothing and footwear	0.2	0.0	X	X	-	-	X	X
141	46.43 Wholesale of electrical household appliances	2.5	-	X	X	0.0	0.0	X	X
142	46.45 Wholesale of perfume and cosmetics	0.7	0.0	X	X	-	-	X	X
143	46.49 Wholesale of other household goods	0.5	-	X	X	-	-	X	X
144	46.69 Wholesale of other machinery and equipment	7.3	0.0	X	X	0.0	0.0	X	X
145	46.71 Wholesale of solid, liquid and gaseous fuels and related products	4.0	0.4	X	X	0.0	-	X	X
146	46.72 Wholesale of metals and metal ores	34.0	5.3	X	X	-	-	X	X
147	46.73 Wholesale of wood, construction materials and sanitary equipment	5.0	0.0	X	X	-	-	X	X
148	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.9	-	X	X	-	-	X	X
149	46.75 Wholesale of chemical products	16.5	0.3	X	X	0.0	-	X	X
150	46.76 Wholesale of other intermediate products	0.6	0.0	X	X	0.0	-	X	X
151	46.90 Non-specialised wholesale trade	18.7	2.2	X	X	-	-	X	X
152	47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	9.4	0.0	X	X	0.0	0.0	X	X
153	47.19 Other retail sale in non-specialised stores	0.2	-	X	X	-	-	X	X
154	47.21 Retail sale of fruit and vegetables in specialised stores	0.1	0.0	X	X	-	-	X	X
155	47.22 Retail sale of meat and meat products in specialised stores	1.5	-	X	X	-	-	X	X
156	47.29 Other retail sale of food in specialised stores	9.3	-	X	X	-	-	X	X
157	47.30 Retail sale of automotive fuel in specialised stores	1.0	-	X	X	-	-	X	X
158	47.41 Retail sale of computers, peripheral units and software in specialised stores	0.0	-	X	X	0.0	-	X	X
159	47.43 Retail sale of audio and video equipment in specialised stores	0.5	-	X	X	-	-	X	X
160	47.51 Retail sale of textiles in specialised stores	2.5	-	X	X	-	-	X	X
161	47.52 Retail sale of hardware, paints and glass in specialised stores	0.1	-	X	X	-	-	X	X

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	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
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	[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)
162 47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.2	-	X	X	-	-	X	X
163 47.72 Retail sale of footwear and leather goods in specialised stores	0.4	0.0	X	X	-	-	X	X
164 47.73 Dispensing chemist in specialised stores	1.1	-	X	X	-	-	X	X
165 47.78 Other retail sale of new goods in specialised stores	31.1	-	X	X	-	-	X	X
166 47.91 Retail sale via mail order houses or via Internet	4.5	-	X	X	-	-	X	X
167 49.10 Passenger rail transport, interurban	135.7	111.2	X	X	159.3	-	X	X
168 49.20 Freight rail transport	43.4	0.0	X	X	-	-	X	X
169 49.31 Urban and suburban passenger land transport	13.6	0.0	X	X	-	-	X	X
170 49.39 Other passenger land transport n.e.c.	3.3	0.5	X	X	-	-	X	X
171 49.41 Freight transport by road	4.9	0.0	X	X	0.0	-	X	X
172 51.10 Passenger air transport	959.8	-	X	X	-	-	X	X
173 51.21 Freight air transport	26.0	-	X	X	-	-	X	X
174 52.10 Warehousing and storage	0.4	-	X	X	-	-	X	X
175 52.21 Service activities incidental to land transportation	8.5	3.1	X	X	-	-	X	X
176 52.22 Service activities incidental to water transportation	3.5	-	X	X	-	-	X	X
177 52.23 Service activities incidental to air transportation	204.2	13.0	X	X	-	-	X	X
178 52.29 Other transportation support activities	37.7	0.0	X	X	-	-	X	X
179 53.20 Other postal and courier activities	82.6	29.4	X	X	49.6	-	X	X
180 55.10 Hotels and similar accommodation	71.1	0.0	X	X	0.1	-	X	X
181 55.20 Holiday and other short- stay accommodation	1.0	-	X	X	-	-	X	X
182 56.10 Restaurants and mobile food service activities	0.6	-	X	X	0.0	-	X	X
183 56.21 Event catering activities	0.4	-	X	X	-	-	X	X
184 56.29 Other food service activities	0.7	-	X	X	-	-	X	X
185 59.11 Motion picture, video and television programme production activities	0.7	-	X	X	28.1	0.6	X	X
186 60.20 Television programming and broadcasting activities	0.3	0.2	X	X	0.8	0.8	X	X
187 61.10 Wired telecommunications activities	0.4	0.0	X	X	0.2	0.1	X	X
188 61.20 Wireless telecommunications activities	0.1	0.0	X	X	0.2	0.1	X	X
189 61.90 Other telecommunications activities	21.3	0.6	X	X	1.4	0.0	X	X
190 62.01 Computer programming activities	0.1	0.0	X	X	-	-	X	X

		a	b	c	d	e	f	g	h
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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)
191	62.02 Computer consultancy activities	321.3	4.2	X	X	4.8	4.8	X	X
192	62.09 Other information technology and computer service activities	1.9	0.0	X	X	-	-	X	X
193	63.11 Data processing, hosting and related activities	10.5	8.9	X	X	0.0	0.0	X	X
194	63.12 Web portals	0.1	0.1	X	X	1.0	1.0	X	X
195	64.99 Other financial service activities, except insurance and pension funding n.e.c.	10.1	4.8	X	X	1.3	0.3	X	X
196	66.19 Other activities auxiliary to financial services, except insurance and pension funding	3.8	0.8	X	X	-	-	X	X
197	68.10 Buying and selling of own real estate	820.2	1.0	X	X	0.0	-	X	X
198	68.20 Renting and operating of own or leased real estate	6 121.0	2.6	X	X	0.0	-	X	X
199	68.31 Real estate agencies	108.8	0.0	X	X	0.0	-	X	X
200	68.32 Management of real estate on a fee or contract basis	1 397.2	0.0	X	X	0.0	-	X	X
201	69.10 Legal activities	0.9	-	X	X	-	-	X	X
202	70.10 Activities of head offices	473.4	96.6	X	X	0.0	-	X	X
203	70.22 Business and other management consultancy activities	9.5	0.0	X	X	0.1	0.1	X	X
204	71.11 Architectural activities	0.9	-	X	X	-	-	X	X
205	71.12 Engineering activities and related technical consultancy	11.5	10.7	X	X	0.0	0.0	X	X
206	71.20 Technical testing and analysis	23.2	0.0	X	X	-	-	X	X
207	72.19 Other research and experimental development on natural sciences and engineering	3.4	-	X	X	-	-	X	X
208	73.12 Media representation	0.2	-	X	X	0.9	-	X	X
209	74.20 Photographic activities	1.8	-	X	X	-	-	X	X
210	74.90 Other professional, scientific and technical activities n.e.c.	74.4	0.0	X	X	0.0	-	X	X
211	75.00 Veterinary activities	7.3	-	X	X	-	-	X	X
212	77.11 Renting and leasing of cars and light motor vehicles	11.4	1.4	X	X	0.0	-	X	X
213	77.12 Renting and leasing of trucks	4.3	-	X	X	-	-	X	X
214	77.29 Renting and leasing of other personal and household goods	0.1	-	X	X	-	-	X	X
215	77.31 Renting and leasing of agricultural machinery and equipment	63.3	-	X	X	-	-	X	X
216	77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	9.3	-	X	X	-	-	X	X
217	79.12 Tour operator activities	6.7	-	X	X	-	-	X	X
218	80.10 Private security activities	8.0	0.0	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)	
219	81.22 Other building and industrial cleaning activities	0.2	-	X	X	-	-	X	X
220	81.30 Landscape service activities	0.6	-	X	X	-	-	X	X
221	82.99 Other business support service activities n.e.c.	46.5	2.6	X	X	0.1	0.0	X	X
222	85.10 Pre-primary education	0.8	-	X	X	-	-	X	X
223	86.10 Hospital activities	0.4	-	X	X	-	-	X	X
224	86.22 Specialist medical practice activities	4.7	-	X	X	-	-	X	X
225	86.90 Other human health activities	0.5	-	X	X	-	-	X	X
226	87.90 Other residential care activities	1.4	-	X	X	-	-	X	X
227	90.02 Support activities to performing arts	0.1	-	X	X	-	-	X	X
228	93.11 Operation of sports facilities	11.1	-	X	X	-	-	X	X
229	93.21 Activities of amusement parks and theme parks	14.7	-	X	X	-	-	X	X
230	93.29 Other amusement and recreation activities	6.5	-	X	X	-	-	X	X
231	94.99 Activities of other membership organisations n.e.c.	9.6	-	X	X	-	-	X	X
232	96.01 Washing and (dry-)cleaning of textile and fur products	0.3	-	X	X	-	-	X	X
233	96.09 Other personal service activities n.e.c.	121.9	0.0	X	X	0.0	-	X	X

		i	j	k	l	m	n	o	p
		Water and marine resources (WTR)				Circular economy (CE)			
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) ¹		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (WTR)	million €	Of which environ- mentally sustainable (WTR)	million €	Of which environ- mentally sustainable (CE)	million €	Of which environ- mentally sustainable (CE)
1	01.30 Plant propagation	-	-	X	X	-	-	X	X
2	01.50 Mixed farming	-	-	X	X	-	-	X	X
3	01.61 Support activities for crop production	-	-	X	X	-	-	X	X
4	01.63 Post-harvest crop activities	-	-	X	X	-	-	X	X
5	02.40 Support services to forestry	-	-	X	X	-	-	X	X
6	06.10 Extraction of crude petroleum	-	-	X	X	0.0	-	X	X
7	07.29 Mining of other non-ferrous metal ores	-	-	X	X	-	-	X	X
8	08.12 Operation of gravel and sand pits; mining of clays and kaolin	0.0	-	X	X	0.2	-	X	X
9	10.13 Production of meat and poultry meat products	-	-	X	X	0.7	-	X	X
10	10.39 Other processing and preserving of fruit and vegetables	-	-	X	X	-	-	X	X
11	10.51 Operation of dairies and cheese making	-	-	X	X	0.0	-	X	X
12	10.61 Manufacture of grain mill products	-	-	X	X	-	-	X	X
13	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-	X	X	-	-	X	X
14	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	-	-	X	X	-	-	X	X
15	10.82 Manufacture of cocoa, chocolate and sugar confectionery	-	-	X	X	-	-	X	X
16	10.86 Manufacture of homogenised food preparations and dietetic food	-	-	X	X	-	-	X	X
17	10.89 Manufacture of other food products n.e.c.	-	-	X	X	0.0	-	X	X
18	11.01 Distilling, rectifying and blending of spirits	-	-	X	X	-	-	X	X
19	11.05 Manufacture of beer	-	-	X	X	-	-	X	X
20	13.99 Manufacture of other textiles n.e.c.	-	-	X	X	-	-	X	X
21	14.19 Manufacture of other wearing apparel and accessories	-	-	X	X	-	-	X	X
22	16.21 Manufacture of veneer sheets and wood-based panels	-	-	X	X	-	-	X	X
23	16.23 Manufacture of other builders' carpentry and joinery	-	-	X	X	-	-	X	X
24	16.24 Manufacture of wooden containers	-	-	X	X	-	-	X	X
25	16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	-	-	X	X	-	-	X	X
26	17.12 Manufacture of paper and paperboard	-	-	X	X	-	-	X	X

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		Water and marine resources (WTR)				Circular economy (CE)			
Based on the Turnover KPI	Non-Financial corporates (Subject to NFRD)	[Gross] carrying amount		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
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27	17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	-	-	X	X	0.8	-	X	X
28	17.23 Manufacture of paper stationery	-	-	X	X	-	-	X	X
29	18.12 Other printing	-	-	X	X	-	-	X	X
30	18.13 Pre-press and pre-media services	-	-	X	X	-	-	X	X
31	19.20 Manufacture of refined petroleum products	-	-	X	X	-	-	X	X
32	20.13 Manufacture of other inorganic basic chemicals	-	-	X	X	-	-	X	X
33	20.15 Manufacture of fertilisers and nitrogen compounds	-	-	X	X	-	-	X	X
34	20.16 Manufacture of plastics in primary forms	-	-	X	X	-	-	X	X
35	20.17 Manufacture of synthetic rubber in primary forms	-	-	X	X	-	-	X	X
36	20.20 Manufacture of pesticides and other agrochemical products	-	-	X	X	-	-	X	X
37	20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	-	-	X	X	0.0	-	X	X
38	20.59 Manufacture of other chemical products n.e.c.	0.0	-	X	X	0.3	-	X	X
39	20.60 Manufacture of man-made fibres	-	-	X	X	-	-	X	X
40	21.10 Manufacture of basic pharmaceutical products	-	-	X	X	0.0	-	X	X
41	21.20 Manufacture of pharmaceutical preparations	-	-	X	X	-	-	X	X
42	22.21 Manufacture of plastic plates, sheets, tubes and profiles	-	-	X	X	-	-	X	X
43	22.22 Manufacture of plastic packing goods	0.9	-	X	X	11.8	-	X	X
44	22.23 Manufacture of builders' ware of plastic	-	-	X	X	-	-	X	X
45	22.29 Manufacture of other plastic products	-	-	X	X	-	-	X	X
46	23.11 Manufacture of flat glass	-	-	X	X	-	-	X	X
47	23.14 Manufacture of glass fibres	-	-	X	X	-	-	X	X
48	23.19 Manufacture and processing of other glass, including technical glassware	-	-	X	X	-	-	X	X
49	23.20 Manufacture of refractory products	-	-	X	X	-	-	X	X
50	23.32 Manufacture of bricks, tiles and construction products, in baked clay	-	-	X	X	-	-	X	X
51	23.44 Manufacture of other technical ceramic products	-	-	X	X	-	-	X	X
52	23.51 Manufacture of cement	-	-	X	X	-	-	X	X
53	23.61 Manufacture of concrete products for construction purposes	-	-	X	X	-	-	X	X

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54	24.10 Manufacture of basic iron and steel and of ferro-alloys	-	-	X	X	0.3	-	X	X
55	24.34 Cold drawing of wire	-	-	X	X	-	-	X	X
56	24.41 Precious metals production	-	-	X	X	-	-	X	X
57	24.42 Aluminium production	-	-	X	X	0.0	-	X	X
58	24.51 Casting of iron	-	-	X	X	-	-	X	X
59	24.52 Casting of steel	-	-	X	X	-	-	X	X
60	24.53 Casting of light metals	-	-	X	X	-	-	X	X
61	25.11 Manufacture of metal structures and parts of structures	0.0	-	X	X	0.0	-	X	X
62	25.12 Manufacture of doors and windows of metal	-	-	X	X	0.1	-	X	X
63	25.21 Manufacture of central heating radiators and boilers	-	-	X	X	-	-	X	X
64	25.40 Manufacture of weapons and ammunition	0.0	-	X	X	0.0	-	X	X
65	25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	-	-	X	X	0.1	-	X	X
66	25.61 Treatment and coating of metals	-	-	X	X	-	-	X	X
67	25.62 Machining	-	-	X	X	-	-	X	X
68	25.71 Manufacture of cutlery	-	-	X	X	-	-	X	X
69	25.73 Manufacture of tools	-	-	X	X	-	-	X	X
70	25.99 Manufacture of other fabricated metal products n.e.c.	3.3	-	X	X	0.0	-	X	X
71	26.11 Manufacture of electronic components	-	-	X	X	0.0	-	X	X
72	26.20 Manufacture of computers and peripheral equipment	-	-	X	X	-	-	X	X
73	26.51 Manufacture of instruments and appliances for measuring, testing and navigation	0.0	-	X	X	0.3	-	X	X
74	26.70 Manufacture of optical instruments and photographic equipment	-	-	X	X	0.0	-	X	X
75	27.11 Manufacture of electric motors, generators and transformers	-	-	X	X	-	-	X	X
76	27.12 Manufacture of electricity distribution and control apparatus	0.0	-	X	X	0.5	-	X	X
77	27.20 Manufacture of batteries and accumulators	-	-	X	X	-	-	X	X
78	27.32 Manufacture of other electronic and electric wires and cables	0.0	-	X	X	0.0	-	X	X
79	27.40 Manufacture of electric lighting equipment	0.0	-	X	X	6.0	-	X	X
80	27.52 Manufacture of non-electric domestic appliances	-	-	X	X	-	-	X	X
81	27.90 Manufacture of other electrical equipment	0.1	-	X	X	0.3	-	X	X
82	28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	-	-	X	X	0.0	-	X	X

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83	28.15 Manufacture of bearings, gears, gearing and driving elements	-	-	X	X	-	-	X	X
84	28.21 Manufacture of ovens, furnaces and furnace burners	-	-	X	X	0.0	-	X	X
85	28.22 Manufacture of lifting and handling equipment	-	-	X	X	1.9	-	X	X
86	28.29 Manufacture of other general-purpose machinery n.e.c.	-	-	X	X	0.0	-	X	X
87	28.30 Manufacture of agricultural and forestry machinery	-	-	X	X	0.0	-	X	X
88	28.41 Manufacture of metal forming machinery	0.2	-	X	X	0.2	-	X	X
89	28.49 Manufacture of other machine tools	0.0	-	X	X	0.0	-	X	X
90	28.91 Manufacture of machinery for metallurgy	0.9	-	X	X	3.3	-	X	X
91	28.92 Manufacture of machinery for mining, quarrying and construction	-	-	X	X	-	-	X	X
92	28.93 Manufacture of machinery for food, beverage and tobacco processing	-	-	X	X	0.0	-	X	X
93	28.94 Manufacture of machinery for textile, apparel and leather production	-	-	X	X	-	-	X	X
94	28.95 Manufacture of machinery for paper and paperboard production	-	-	X	X	0.5	-	X	X
95	28.99 Manufacture of other special-purpose machinery n.e.c.	0.0	-	X	X	0.3	-	X	X
96	29.10 Manufacture of motor vehicles	-	-	X	X	6.2	-	X	X
97	29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	-	-	X	X	-	-	X	X
98	29.31 Manufacture of electrical and electronic equipment for motor vehicles	-	-	X	X	-	-	X	X
99	29.32 Manufacture of other parts and accessories for motor vehicles	-	-	X	X	-	-	X	X
100	30.20 Manufacture of railway locomotives and rolling stock	-	-	X	X	0.0	-	X	X
101	30.30 Manufacture of air and spacecraft and related machinery	0.0	-	X	X	0.0	-	X	X
102	30.99 Manufacture of other transport equipment n.e.c.	-	-	X	X	0.0	-	X	X
103	31.09 Manufacture of other furniture	-	-	X	X	-	-	X	X
104	32.40 Manufacture of games and toys	-	-	X	X	-	-	X	X
105	32.50 Manufacture of medical and dental instruments and supplies	-	-	X	X	95.9	-	X	X
106	32.99 Other manufacturing n.e.c.	-	-	X	X	0.0	-	X	X
107	33.12 Repair of machinery	-	-	X	X	-	-	X	X

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108	33.13 Repair of electronic and optical equipment	-	-	X	X	-	-	X	X
109	35.11 Production of electricity	0.1	-	X	X	0.5	-	X	X
110	35.12 Transmission of electricity	-	-	X	X	0.0	-	X	X
111	35.13 Distribution of electricity	0.7	-	X	X	0.2	-	X	X
112	35.23 Trade of gas through mains	-	-	X	X	-	-	X	X
113	35.30 Steam and air conditioning supply	-	-	X	X	-	-	X	X
114	36.00 Water collection, treatment and supply	6.3	-	X	X	1.6	-	X	X
115	38.11 Collection of non-hazardous waste	0.0	-	X	X	0.0	-	X	X
116	38.22 Treatment and disposal of hazardous waste	-	-	X	X	-	-	X	X
117	38.32 Recovery of sorted materials	0.0	-	X	X	0.0	-	X	X
118	39.00 Remediation activities and other waste management services	0.0	-	X	X	0.0	-	X	X
119	41.10 Development of building projects	0.0	-	X	X	0.0	-	X	X
120	41.20 Construction of residential and non-residential buildings	0.0	-	X	X	0.0	-	X	X
121	42.11 Construction of roads and motorways	0.5	-	X	X	3.3	-	X	X
122	42.12 Construction of railways and underground railways	-	-	X	X	-	-	X	X
123	42.21 Construction of utility projects for fluids	-	-	X	X	-	-	X	X
124	42.91 Construction of water projects	-	-	X	X	-	-	X	X
125	42.99 Construction of other civil engineering projects n.e.c.	0.0	-	X	X	0.0	-	X	X
126	43.12 Site preparation	-	-	X	X	-	-	X	X
127	43.21 Electrical installation	0.0	-	X	X	0.0	-	X	X
128	43.22 Plumbing, heat and air-conditioning installation	0.0	-	X	X	0.0	-	X	X
129	43.29 Other construction installation	0.0	-	X	X	0.0	-	X	X
130	43.91 Roofing activities	-	-	X	X	-	-	X	X
131	43.99 Other specialised construction activities n.e.c.	-	-	X	X	15.6	-	X	X
132	45.11 Sale of cars and light motor vehicles	-	-	X	X	-	-	X	X
133	45.19 Sale of other motor vehicles	-	-	X	X	-	-	X	X
134	45.20 Maintenance and repair of motor vehicles	-	-	X	X	0.0	-	X	X
135	45.31 Wholesale trade of motor vehicle parts and accessories	-	-	X	X	0.0	-	X	X
136	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	-	-	X	X	-	-	X	X
137	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	X	X	1.9	-	X	X

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		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (CE)	million €	Of which environmentally sustainable (CE)
138	46.32 Wholesale of meat and meat products	-	-	X	X	-	-	X	X
139	46.39 Non-specialised wholesale of food, beverages and tobacco	-	-	X	X	0.0	-	X	X
140	46.42 Wholesale of clothing and footwear	-	-	X	X	-	-	X	X
141	46.43 Wholesale of electrical household appliances	0.0	-	X	X	0.0	-	X	X
142	46.45 Wholesale of perfume and cosmetics	-	-	X	X	-	-	X	X
143	46.49 Wholesale of other household goods	-	-	X	X	-	-	X	X
144	46.69 Wholesale of other machinery and equipment	0.0	-	X	X	3.1	-	X	X
145	46.71 Wholesale of solid, liquid and gaseous fuels and related products	-	-	X	X	0.0	-	X	X
146	46.72 Wholesale of metals and metal ores	-	-	X	X	0.3	-	X	X
147	46.73 Wholesale of wood, construction materials and sanitary equipment	-	-	X	X	-	-	X	X
148	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.0	-	X	X	0.0	-	X	X
149	46.75 Wholesale of chemical products	-	-	X	X	0.0	-	X	X
150	46.76 Wholesale of other intermediate products	-	-	X	X	0.0	-	X	X
151	46.90 Non-specialised wholesale trade	-	-	X	X	0.0	-	X	X
152	47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-	X	X	-	-	X	X
153	47.19 Other retail sale in non-specialised stores	-	-	X	X	-	-	X	X
154	47.21 Retail sale of fruit and vegetables in specialised stores	-	-	X	X	-	-	X	X
155	47.22 Retail sale of meat and meat products in specialised stores	-	-	X	X	-	-	X	X
156	47.29 Other retail sale of food in specialised stores	-	-	X	X	-	-	X	X
157	47.30 Retail sale of automotive fuel in specialised stores	-	-	X	X	-	-	X	X
158	47.41 Retail sale of computers, peripheral units and software in specialised stores	-	-	X	X	1.1	-	X	X
159	47.43 Retail sale of audio and video equipment in specialised stores	-	-	X	X	-	-	X	X
160	47.51 Retail sale of textiles in specialised stores	-	-	X	X	-	-	X	X
161	47.52 Retail sale of hardware, paints and glass in specialised stores	-	-	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	
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162	47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	-	-	X	X	-	-	X	X
163	47.72 Retail sale of footwear and leather goods in specialised stores	-	-	X	X	-	-	X	X
164	47.73 Dispensing chemist in specialised stores	-	-	X	X	-	-	X	X
165	47.78 Other retail sale of new goods in specialised stores	-	-	X	X	-	-	X	X
166	47.91 Retail sale via mail order houses or via Internet	-	-	X	X	-	-	X	X
167	49.10 Passenger rail transport, interurban	-	-	X	X	0.0	-	X	X
168	49.20 Freight rail transport	-	-	X	X	0.0	-	X	X
169	49.31 Urban and suburban passenger land transport	-	-	X	X	0.0	-	X	X
170	49.39 Other passenger land transport n.e.c.	-	-	X	X	-	-	X	X
171	49.41 Freight transport by road	-	-	X	X	-	-	X	X
172	51.10 Passenger air transport	-	-	X	X	-	-	X	X
173	51.21 Freight air transport	-	-	X	X	-	-	X	X
174	52.10 Warehousing and storage	-	-	X	X	-	-	X	X
175	52.21 Service activities incidental to land transportation	-	-	X	X	-	-	X	X
176	52.22 Service activities incidental to water transportation	-	-	X	X	-	-	X	X
177	52.23 Service activities incidental to air transportation	-	-	X	X	-	-	X	X
178	52.29 Other transportation support activities	-	-	X	X	0.0	-	X	X
179	53.20 Other postal and courier activities	-	-	X	X	0.5	-	X	X
180	55.10 Hotels and similar accommodation	0.2	-	X	X	-	-	X	X
181	55.20 Holiday and other short-stay accommodation	-	-	X	X	-	-	X	X
182	56.10 Restaurants and mobile food service activities	-	-	X	X	-	-	X	X
183	56.21 Event catering activities	-	-	X	X	-	-	X	X
184	56.29 Other food service activities	-	-	X	X	-	-	X	X
185	59.11 Motion picture, video and television programme production activities	-	-	X	X	0.8	-	X	X
186	60.20 Television programming and broadcasting activities	-	-	X	X	-	-	X	X
187	61.10 Wired telecommunications activities	0.0	-	X	X	-	-	X	X
188	61.20 Wireless telecommunications activities	0.0	-	X	X	0.0	-	X	X
189	61.90 Other telecommunications activities	-	-	X	X	4.9	-	X	X
190	62.01 Computer programming activities	-	-	X	X	0.0	-	X	X

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191	62.02 Computer consultancy activities	0.0	-	X	X	9.3	-	X	X
192	62.09 Other information technology and computer service activities	-	-	X	X	-	-	X	X
193	63.11 Data processing, hosting and related activities	0.0	-	X	X	0.0	-	X	X
194	63.12 Web portals	-	-	X	X	-	-	X	X
195	64.99 Other financial service activities, except insurance and pension funding n.e.c.	-	-	X	X	-	-	X	X
196	66.19 Other activities auxiliary to financial services, except insurance and pension funding	-	-	X	X	-	-	X	X
197	68.10 Buying and selling of own real estate	-	-	X	X	15.1	-	X	X
198	68.20 Renting and operating of own or leased real estate	-	-	X	X	0.0	-	X	X
199	68.31 Real estate agencies	-	-	X	X	-	-	X	X
200	68.32 Management of real estate on a fee or contract basis	-	-	X	X	-	-	X	X
201	69.10 Legal activities	-	-	X	X	-	-	X	X
202	70.10 Activities of head offices	0.6	-	X	X	8.8	-	X	X
203	70.22 Business and other management consultancy activities	-	-	X	X	0.0	-	X	X
204	71.11 Architectural activities	-	-	X	X	-	-	X	X
205	71.12 Engineering activities and related technical consultancy	-	-	X	X	0.0	-	X	X
206	71.20 Technical testing and analysis	-	-	X	X	-	-	X	X
207	72.19 Other research and experimental development on natural sciences and engineering	-	-	X	X	-	-	X	X
208	73.12 Media representation	-	-	X	X	-	-	X	X
209	74.20 Photographic activities	-	-	X	X	-	-	X	X
210	74.90 Other professional, scientific and technical activities n.e.c.	0.0	-	X	X	0.0	-	X	X
211	75.00 Veterinary activities	-	-	X	X	0.0	-	X	X
212	77.11 Renting and leasing of cars and light motor vehicles	-	-	X	X	-	-	X	X
213	77.12 Renting and leasing of trucks	-	-	X	X	-	-	X	X
214	77.29 Renting and leasing of other personal and household goods	-	-	X	X	-	-	X	X
215	77.31 Renting and leasing of agricultural machinery and equipment	-	-	X	X	-	-	X	X
216	77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	-	-	X	X	-	-	X	X
217	79.12 Tour operator activities	-	-	X	X	-	-	X	X
218	80.10 Private security activities	-	-	X	X	0.1	-	X	X

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219	81.22 Other building and industrial cleaning activities	-	-	X	X	-	-	X	X
220	81.30 Landscape service activities	-	-	X	X	-	-	X	X
221	82.99 Other business support service activities n.e.c.	0.0	-	X	X	0.0	-	X	X
222	85.10 Pre-primary education	-	-	X	X	-	-	X	X
223	86.10 Hospital activities	-	-	X	X	0.1	-	X	X
224	86.22 Specialist medical practice activities	-	-	X	X	-	-	X	X
225	86.90 Other human health activities	-	-	X	X	-	-	X	X
226	87.90 Other residential care activities	-	-	X	X	-	-	X	X
227	90.02 Support activities to performing arts	-	-	X	X	-	-	X	X
228	93.11 Operation of sports facilities	-	-	X	X	-	-	X	X
229	93.21 Activities of amusement parks and theme parks	-	-	X	X	-	-	X	X
230	93.29 Other amusement and recreation activities	-	-	X	X	-	-	X	X
231	94.99 Activities of other membership organisations n.e.c.	-	-	X	X	-	-	X	X
232	96.01 Washing and (dry-)cleaning of textile and fur products	-	-	X	X	-	-	X	X
233	96.09 Other personal service activities n.e.c.	-	-	X	X	0.0	-	X	X

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		million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
1	01.30 Plant propagation	-	-	X	X	-	-	X	X
2	01.50 Mixed farming	-	-	X	X	-	-	X	X
3	01.61 Support activities for crop production	-	-	X	X	-	-	X	X
4	01.63 Post-harvest crop activities	-	-	X	X	-	-	X	X
5	02.40 Support services to forestry	-	-	X	X	-	-	X	X
6	06.10 Extraction of crude petroleum	-	-	X	X	-	-	X	X
7	07.29 Mining of other non-ferrous metal ores	-	-	X	X	-	-	X	X
8	08.12 Operation of gravel and sand pits; mining of clays and kaolin	-	-	X	X	-	-	X	X
9	10.13 Production of meat and poultry meat products	-	-	X	X	-	-	X	X
10	10.39 Other processing and preserving of fruit and vegetables	-	-	X	X	-	-	X	X
11	10.51 Operation of dairies and cheese making	-	-	X	X	-	-	X	X
12	10.61 Manufacture of grain mill products	-	-	X	X	-	-	X	X
13	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-	X	X	-	-	X	X
14	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	-	-	X	X	-	-	X	X
15	10.82 Manufacture of cocoa, chocolate and sugar confectionery	-	-	X	X	-	-	X	X
16	10.86 Manufacture of homogenised food preparations and dietetic food	-	-	X	X	-	-	X	X
17	10.89 Manufacture of other food products n.e.c.	-	-	X	X	-	-	X	X
18	11.01 Distilling, rectifying and blending of spirits	-	-	X	X	-	-	X	X
19	11.05 Manufacture of beer	-	-	X	X	-	-	X	X
20	13.99 Manufacture of other textiles n.e.c.	-	-	X	X	-	-	X	X
21	14.19 Manufacture of other wearing apparel and accessories	-	-	X	X	-	-	X	X
22	16.21 Manufacture of veneer sheets and wood-based panels	-	-	X	X	-	-	X	X
23	16.23 Manufacture of other builders' carpentry and joinery	-	-	X	X	-	-	X	X
24	16.24 Manufacture of wooden containers	-	-	X	X	-	-	X	X
25	16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	-	-	X	X	-	-	X	X
26	17.12 Manufacture of paper and paperboard	-	-	X	X	-	-	X	X

		q	r	s	t	u	v	w	x
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
Based on the Turnover KPI Breakdown by sector - NACE 4 digits level (code and label) ¹		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 (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
27	17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	-	-	X	X	-	-	X	X
28	17.23 Manufacture of paper stationery	-	-	X	X	-	-	X	X
29	18.12 Other printing	-	-	X	X	-	-	X	X
30	18.13 Pre-press and pre-media services	-	-	X	X	-	-	X	X
31	19.20 Manufacture of refined petroleum products	-	-	X	X	-	-	X	X
32	20.13 Manufacture of other inorganic basic chemicals	-	-	X	X	-	-	X	X
33	20.15 Manufacture of fertilisers and nitrogen compounds	-	-	X	X	-	-	X	X
34	20.16 Manufacture of plastics in primary forms	-	-	X	X	-	-	X	X
35	20.17 Manufacture of synthetic rubber in primary forms	-	-	X	X	-	-	X	X
36	20.20 Manufacture of pesticides and other agrochemical products	-	-	X	X	-	-	X	X
37	20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	0.0	-	X	X	-	-	X	X
38	20.59 Manufacture of other chemical products n.e.c.	0.9	-	X	X	-	-	X	X
39	20.60 Manufacture of man-made fibres	-	-	X	X	-	-	X	X
40	21.10 Manufacture of basic pharmaceutical products	4.9	-	X	X	-	-	X	X
41	21.20 Manufacture of pharmaceutical preparations	8.2	-	X	X	-	-	X	X
42	22.21 Manufacture of plastic plates, sheets, tubes and profiles	-	-	X	X	-	-	X	X
43	22.22 Manufacture of plastic packing goods	0.9	-	X	X	-	-	X	X
44	22.23 Manufacture of builders' ware of plastic	-	-	X	X	-	-	X	X
45	22.29 Manufacture of other plastic products	-	-	X	X	-	-	X	X
46	23.11 Manufacture of flat glass	-	-	X	X	-	-	X	X
47	23.14 Manufacture of glass fibres	-	-	X	X	-	-	X	X
48	23.19 Manufacture and processing of other glass, including technical glassware	-	-	X	X	-	-	X	X
49	23.20 Manufacture of refractory products	-	-	X	X	-	-	X	X
50	23.32 Manufacture of bricks, tiles and construction products, in baked clay	-	-	X	X	-	-	X	X
51	23.44 Manufacture of other technical ceramic products	-	-	X	X	-	-	X	X
52	23.51 Manufacture of cement	-	-	X	X	-	-	X	X
53	23.61 Manufacture of concrete products for construction purposes	-	-	X	X	-	-	X	X

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Based on the Turnover KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
	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 (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)	
54	24.10 Manufacture of basic iron and steel and of ferro-alloys	-	-	X	X	-	-	X	X
55	24.34 Cold drawing of wire	-	-	X	X	-	-	X	X
56	24.41 Precious metals production	-	-	X	X	-	-	X	X
57	24.42 Aluminium production	-	-	X	X	-	-	X	X
58	24.51 Casting of iron	-	-	X	X	-	-	X	X
59	24.52 Casting of steel	-	-	X	X	-	-	X	X
60	24.53 Casting of light metals	-	-	X	X	-	-	X	X
61	25.11 Manufacture of metal structures and parts of structures	-	-	X	X	-	-	X	X
62	25.12 Manufacture of doors and windows of metal	0.3	-	X	X	-	-	X	X
63	25.21 Manufacture of central heating radiators and boilers	-	-	X	X	-	-	X	X
64	25.40 Manufacture of weapons and ammunition	0.0	-	X	X	0.0	-	X	X
65	25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	-	-	X	X	-	-	X	X
66	25.61 Treatment and coating of metals	-	-	X	X	-	-	X	X
67	25.62 Machining	-	-	X	X	-	-	X	X
68	25.71 Manufacture of cutlery	-	-	X	X	-	-	X	X
69	25.73 Manufacture of tools	-	-	X	X	-	-	X	X
70	25.99 Manufacture of other fabricated metal products n.e.c.	-	-	X	X	-	-	X	X
71	26.11 Manufacture of electronic components	-	-	X	X	-	-	X	X
72	26.20 Manufacture of computers and peripheral equipment	-	-	X	X	-	-	X	X
73	26.51 Manufacture of instruments and appliances for measuring, testing and navigation	0.0	-	X	X	0.0	-	X	X
74	26.70 Manufacture of optical instruments and photographic equipment	-	-	X	X	-	-	X	X
75	27.11 Manufacture of electric motors, generators and transformers	-	-	X	X	-	-	X	X
76	27.12 Manufacture of electricity distribution and control apparatus	0.0	-	X	X	0.0	-	X	X
77	27.20 Manufacture of batteries and accumulators	-	-	X	X	-	-	X	X
78	27.32 Manufacture of other electronic and electric wires and cables	0.0	-	X	X	0.0	-	X	X
79	27.40 Manufacture of electric lighting equipment	-	-	X	X	0.0	-	X	X
80	27.52 Manufacture of non-electric domestic appliances	-	-	X	X	-	-	X	X
81	27.90 Manufacture of other electrical equipment	-	-	X	X	0.1	-	X	X
82	28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	-	-	X	X	-	-	X	X

		q	r	s	t	u	v	w	x
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
83	28.15 Manufacture of bearings, gears, gearing and driving elements	-	-	X	X	-	-	X	X
84	28.21 Manufacture of ovens, furnaces and furnace burners	-	-	X	X	-	-	X	X
85	28.22 Manufacture of lifting and handling equipment	-	-	X	X	-	-	X	X
86	28.29 Manufacture of other general-purpose machinery n.e.c.	-	-	X	X	-	-	X	X
87	28.30 Manufacture of agricultural and forestry machinery	-	-	X	X	-	-	X	X
88	28.41 Manufacture of metal forming machinery	0.1	-	X	X	-	-	X	X
89	28.49 Manufacture of other machine tools	0.0	-	X	X	-	-	X	X
90	28.91 Manufacture of machinery for metallurgy	0.7	-	X	X	-	-	X	X
91	28.92 Manufacture of machinery for mining, quarrying and construction	-	-	X	X	-	-	X	X
92	28.93 Manufacture of machinery for food, beverage and tobacco processing	-	-	X	X	-	-	X	X
93	28.94 Manufacture of machinery for textile, apparel and leather production	-	-	X	X	-	-	X	X
94	28.95 Manufacture of machinery for paper and paperboard production	-	-	X	X	-	-	X	X
95	28.99 Manufacture of other special-purpose machinery n.e.c.	0.0	-	X	X	0.0	-	X	X
96	29.10 Manufacture of motor vehicles	-	-	X	X	-	-	X	X
97	29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	-	-	X	X	-	-	X	X
98	29.31 Manufacture of electrical and electronic equipment for motor vehicles	-	-	X	X	-	-	X	X
99	29.32 Manufacture of other parts and accessories for motor vehicles	-	-	X	X	-	-	X	X
100	30.20 Manufacture of railway locomotives and rolling stock	-	-	X	X	-	-	X	X
101	30.30 Manufacture of air and spacecraft and related machinery	0.0	-	X	X	0.0	-	X	X
102	30.99 Manufacture of other transport equipment n.e.c.	-	-	X	X	-	-	X	X
103	31.09 Manufacture of other furniture	-	-	X	X	-	-	X	X
104	32.40 Manufacture of games and toys	-	-	X	X	-	-	X	X
105	32.50 Manufacture of medical and dental instruments and supplies	-	-	X	X	-	-	X	X
106	32.99 Other manufacturing n.e.c.	-	-	X	X	-	-	X	X
107	33.12 Repair of machinery	-	-	X	X	-	-	X	X

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		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
Based on the Turnover KPI Breakdown by sector - NACE 4 digits level (code and label) ¹		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 (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
108	33.13 Repair of electronic and optical equipment	-	-	X	X	-	-	X	X
109	35.11 Production of electricity	0.3	-	X	X	-	-	X	X
110	35.12 Transmission of electricity	-	-	X	X	-	-	X	X
111	35.13 Distribution of electricity	0.2	-	X	X	-	-	X	X
112	35.23 Trade of gas through mains	-	-	X	X	-	-	X	X
113	35.30 Steam and air conditioning supply	-	-	X	X	-	-	X	X
114	36.00 Water collection, treatment and supply	1.4	-	X	X	-	-	X	X
115	38.11 Collection of non-hazardous waste	0.0	-	X	X	-	-	X	X
116	38.22 Treatment and disposal of hazardous waste	-	-	X	X	-	-	X	X
117	38.32 Recovery of sorted materials	0.0	-	X	X	-	-	X	X
118	39.00 Remediation activities and other waste management services	0.0	-	X	X	-	-	X	X
119	41.10 Development of building projects	0.0	-	X	X	-	-	X	X
120	41.20 Construction of residential and non-residential buildings	-	-	X	X	-	-	X	X
121	42.11 Construction of roads and motorways	0.0	-	X	X	0.0	-	X	X
122	42.12 Construction of railways and underground railways	-	-	X	X	-	-	X	X
123	42.21 Construction of utility projects for fluids	-	-	X	X	-	-	X	X
124	42.91 Construction of water projects	-	-	X	X	-	-	X	X
125	42.99 Construction of other civil engineering projects n.e.c.	0.0	-	X	X	0.0	-	X	X
126	43.12 Site preparation	-	-	X	X	-	-	X	X
127	43.21 Electrical installation	0.0	-	X	X	0.0	-	X	X
128	43.22 Plumbing, heat and air-conditioning installation	-	-	X	X	-	-	X	X
129	43.29 Other construction installation	-	-	X	X	-	-	X	X
130	43.91 Roofing activities	-	-	X	X	-	-	X	X
131	43.99 Other specialised construction activities n.e.c.	-	-	X	X	-	-	X	X
132	45.11 Sale of cars and light motor vehicles	-	-	X	X	-	-	X	X
133	45.19 Sale of other motor vehicles	-	-	X	X	-	-	X	X
134	45.20 Maintenance and repair of motor vehicles	-	-	X	X	-	-	X	X
135	45.31 Wholesale trade of motor vehicle parts and accessories	-	-	X	X	-	-	X	X
136	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	-	-	X	X	-	-	X	X
137	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	X	X	-	-	X	X

		q	r	s	t	u	v	w	x
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		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
138	46.32 Wholesale of meat and meat products	-	-	X	X	-	-	X	X
139	46.39 Non-specialised wholesale of food, beverages and tobacco	-	-	X	X	-	-	X	X
140	46.42 Wholesale of clothing and footwear	0.0	-	X	X	-	-	X	X
141	46.43 Wholesale of electrical household appliances	0.0	-	X	X	0.0	-	X	X
142	46.45 Wholesale of perfume and cosmetics	2.8	-	X	X	-	-	X	X
143	46.49 Wholesale of other household goods	-	-	X	X	-	-	X	X
144	46.69 Wholesale of other machinery and equipment	-	-	X	X	-	-	X	X
145	46.71 Wholesale of solid, liquid and gaseous fuels and related products	-	-	X	X	-	-	X	X
146	46.72 Wholesale of metals and metal ores	-	-	X	X	-	-	X	X
147	46.73 Wholesale of wood, construction materials and sanitary equipment	-	-	X	X	-	-	X	X
148	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	-	-	X	X	-	-	X	X
149	46.75 Wholesale of chemical products	-	-	X	X	-	-	X	X
150	46.76 Wholesale of other intermediate products	-	-	X	X	-	-	X	X
151	46.90 Non-specialised wholesale trade	-	-	X	X	-	-	X	X
152	47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-	X	X	-	-	X	X
153	47.19 Other retail sale in non-specialised stores	-	-	X	X	-	-	X	X
154	47.21 Retail sale of fruit and vegetables in specialised stores	-	-	X	X	-	-	X	X
155	47.22 Retail sale of meat and meat products in specialised stores	-	-	X	X	-	-	X	X
156	47.29 Other retail sale of food in specialised stores	-	-	X	X	-	-	X	X
157	47.30 Retail sale of automotive fuel in specialised stores	-	-	X	X	-	-	X	X
158	47.41 Retail sale of computers, peripheral units and software in specialised stores	-	-	X	X	-	-	X	X
159	47.43 Retail sale of audio and video equipment in specialised stores	-	-	X	X	-	-	X	X
160	47.51 Retail sale of textiles in specialised stores	-	-	X	X	-	-	X	X
161	47.52 Retail sale of hardware, paints and glass in specialised stores	-	-	X	X	-	-	X	X

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	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
162 47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	-	-	X	X	-	-	X	X
163 47.72 Retail sale of footwear and leather goods in specialised stores	0.0	-	X	X	-	-	X	X
164 47.73 Dispensing chemist in specialised stores	-	-	X	X	-	-	X	X
165 47.78 Other retail sale of new goods in specialised stores	-	-	X	X	-	-	X	X
166 47.91 Retail sale via mail order houses or via Internet	-	-	X	X	-	-	X	X
167 49.10 Passenger rail transport, interurban	-	-	X	X	-	-	X	X
168 49.20 Freight rail transport	-	-	X	X	-	-	X	X
169 49.31 Urban and suburban passenger land transport	-	-	X	X	-	-	X	X
170 49.39 Other passenger land transport n.e.c.	-	-	X	X	-	-	X	X
171 49.41 Freight transport by road	-	-	X	X	-	-	X	X
172 51.10 Passenger air transport	-	-	X	X	-	-	X	X
173 51.21 Freight air transport	-	-	X	X	-	-	X	X
174 52.10 Warehousing and storage	-	-	X	X	-	-	X	X
175 52.21 Service activities incidental to land transportation	-	-	X	X	-	-	X	X
176 52.22 Service activities incidental to water transportation	-	-	X	X	-	-	X	X
177 52.23 Service activities incidental to air transportation	-	-	X	X	-	-	X	X
178 52.29 Other transportation support activities	-	-	X	X	-	-	X	X
179 53.20 Other postal and courier activities	-	-	X	X	-	-	X	X
180 55.10 Hotels and similar accommodation	-	-	X	X	15.4	-	X	X
181 55.20 Holiday and other short-stay accommodation	-	-	X	X	-	-	X	X
182 56.10 Restaurants and mobile food service activities	-	-	X	X	-	-	X	X
183 56.21 Event catering activities	-	-	X	X	-	-	X	X
184 56.29 Other food service activities	-	-	X	X	-	-	X	X
185 59.11 Motion picture, video and television programme production activities	-	-	X	X	-	-	X	X
186 60.20 Television programming and broadcasting activities	-	-	X	X	0.0	-	X	X
187 61.10 Wired telecommunications activities	-	-	X	X	-	-	X	X
188 61.20 Wireless telecommunications activities	-	-	X	X	-	-	X	X
189 61.90 Other telecommunications activities	-	-	X	X	-	-	X	X
190 62.01 Computer programming activities	0.0	-	X	X	-	-	X	X

		q	r	s	t	u	v	w	x
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
191	62.02 Computer consultancy activities	0.1	-	X	X	-	-	X	X
192	62.09 Other information technology and computer service activities	0.6	-	X	X	-	-	X	X
193	63.11 Data processing, hosting and related activities	-	-	X	X	-	-	X	X
194	63.12 Web portals	-	-	X	X	-	-	X	X
195	64.99 Other financial service activities, except insurance and pension funding n.e.c.	11.7	-	X	X	-	-	X	X
196	66.19 Other activities auxiliary to financial services, except insurance and pension funding	-	-	X	X	-	-	X	X
197	68.10 Buying and selling of own real estate	-	-	X	X	0.0	-	X	X
198	68.20 Renting and operating of own or leased real estate	0.0	-	X	X	-	-	X	X
199	68.31 Real estate agencies	-	-	X	X	0.0	-	X	X
200	68.32 Management of real estate on a fee or contract basis	0.0	-	X	X	0.0	-	X	X
201	69.10 Legal activities	-	-	X	X	-	-	X	X
202	70.10 Activities of head offices	0.0	-	X	X	0.0	-	X	X
203	70.22 Business and other management consultancy activities	-	-	X	X	-	-	X	X
204	71.11 Architectural activities	-	-	X	X	-	-	X	X
205	71.12 Engineering activities and related technical consultancy	-	-	X	X	-	-	X	X
206	71.20 Technical testing and analysis	-	-	X	X	-	-	X	X
207	72.19 Other research and experimental development on natural sciences and engineering	-	-	X	X	-	-	X	X
208	73.12 Media representation	-	-	X	X	-	-	X	X
209	74.20 Photographic activities	-	-	X	X	-	-	X	X
210	74.90 Other professional, scientific and technical activities n.e.c.	0.0	-	X	X	-	-	X	X
211	75.00 Veterinary activities	0.0	-	X	X	-	-	X	X
212	77.11 Renting and leasing of cars and light motor vehicles	-	-	X	X	-	-	X	X
213	77.12 Renting and leasing of trucks	-	-	X	X	-	-	X	X
214	77.29 Renting and leasing of other personal and household goods	-	-	X	X	-	-	X	X
215	77.31 Renting and leasing of agricultural machinery and equipment	-	-	X	X	-	-	X	X
216	77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	-	-	X	X	-	-	X	X
217	79.12 Tour operator activities	-	-	X	X	-	-	X	X
218	80.10 Private security activities	-	-	X	X	-	-	X	X

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		q	r	s	t	u	v	w	x
Based on the Turnover KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
	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 (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)	
219	81.22 Other building and industrial cleaning activities	-	-	X	X	-	-	X	X
220	81.30 Landscape service activities	-	-	X	X	-	-	X	X
221	82.99 Other business support service activities n.e.c.	0.0	-	X	X	-	-	X	X
222	85.10 Pre-primary education	-	-	X	X	-	-	X	X
223	86.10 Hospital activities	0.6	-	X	X	-	-	X	X
224	86.22 Specialist medical practice activities	-	-	X	X	-	-	X	X
225	86.90 Other human health activities	-	-	X	X	-	-	X	X
226	87.90 Other residential care activities	-	-	X	X	-	-	X	X
227	90.02 Support activities to performing arts	-	-	X	X	-	-	X	X
228	93.11 Operation of sports facilities	-	-	X	X	-	-	X	X
229	93.21 Activities of amusement parks and theme parks	-	-	X	X	-	-	X	X
230	93.29 Other amusement and recreation activities	-	-	X	X	-	-	X	X
231	94.99 Activities of other membership organisations n.e.c.	-	-	X	X	-	-	X	X
232	96.01 Washing and (dry-)cleaning of textile and fur products	-	-	X	X	-	-	X	X
233	96.09 Other personal service activities n.e.c.	-	-	X	X	-	-	X	X

	y	z	aa	ab
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
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	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
1 01.30 Plant propagation	0.4	-	X	X
2 01.50 Mixed farming	16.2	-	X	X
3 01.61 Support activities for crop production	0.5	-	X	X
4 01.63 Post-harvest crop activities	3.3	-	X	X
5 02.40 Support services to forestry	0.1	-	X	X
6 06.10 Extraction of crude petroleum	3.2	0.6	X	X
7 07.29 Mining of other non-ferrous metal ores	0.4	-	X	X
8 08.12 Operation of gravel and sand pits; mining of clays and kaolin	1.2	0.4	X	X
9 10.13 Production of meat and poultry meat products	1.7	-	X	X
10 10.39 Other processing and preserving of fruit and vegetables	3.2	-	X	X
11 10.51 Operation of dairies and cheese making	20.0	-	X	X
12 10.61 Manufacture of grain mill products	18.7	-	X	X
13 10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	1.8	-	X	X
14 10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	0.3	-	X	X
15 10.82 Manufacture of cocoa, chocolate and sugar confectionery	0.2	-	X	X
16 10.86 Manufacture of homogenised food preparations and dietetic food	0.6	-	X	X
17 10.89 Manufacture of other food products n.e.c.	0.1	-	X	X
18 11.01 Distilling, rectifying and blending of spirits	0.9	-	X	X
19 11.05 Manufacture of beer	31.9	-	X	X
20 13.99 Manufacture of other textiles n.e.c.	0.2	-	X	X
21 14.19 Manufacture of other wearing apparel and accessories	47.1	-	X	X
22 16.21 Manufacture of veneer sheets and wood-based panels	30.3	-	X	X
23 16.23 Manufacture of other builders' carpentry and joinery	0.9	0.0	X	X
24 16.24 Manufacture of wooden containers	10.6	-	X	X
25 16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.2	0.0	X	X
26 17.12 Manufacture of paper and paperboard	0.6	0.3	X	X

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		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
27	17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	3.8	0.5	X	X
28	17.23 Manufacture of paper stationery	1.4	-	X	X
29	18.12 Other printing	18.0	-	X	X
30	18.13 Pre-press and pre-media services	0.6	-	X	X
31	19.20 Manufacture of refined petroleum products	28.4	0.3	X	X
32	20.13 Manufacture of other inorganic basic chemicals	0.4	0.1	X	X
33	20.15 Manufacture of fertilisers and nitrogen compounds	0.2	0.0	X	X
34	20.16 Manufacture of plastics in primary forms	7.1	-	X	X
35	20.17 Manufacture of synthetic rubber in primary forms	13.0	-	X	X
36	20.20 Manufacture of pesticides and other agrochemical products	0.9	-	X	X
37	20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.4	0.1	X	X
38	20.59 Manufacture of other chemical products n.e.c.	65.0	0.5	X	X
39	20.60 Manufacture of man-made fibres	64.8	0.0	X	X
40	21.10 Manufacture of basic pharmaceutical products	9.2	0.0	X	X
41	21.20 Manufacture of pharmaceutical preparations	95.0	0.0	X	X
42	22.21 Manufacture of plastic plates, sheets, tubes and profiles	0.5	0.2	X	X
43	22.22 Manufacture of plastic packing goods	24.3	1.1	X	X
44	22.23 Manufacture of builders' ware of plastic	5.4	-	X	X
45	22.29 Manufacture of other plastic products	2.4	0.0	X	X
46	23.11 Manufacture of flat glass	1.0	1.0	X	X
47	23.14 Manufacture of glass fibres	2.1	-	X	X
48	23.19 Manufacture and processing of other glass, including technical glassware	0.1	-	X	X
49	23.20 Manufacture of refractory products	0.1	-	X	X
50	23.32 Manufacture of bricks, tiles and construction products, in baked clay	10.1	7.1	X	X
51	23.44 Manufacture of other technical ceramic products	0.3	-	X	X
52	23.51 Manufacture of cement	40.7	1.9	X	X

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	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
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	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
53 23.61 Manufacture of concrete products for construction purposes	0.1	0.0	X	X
54 24.10 Manufacture of basic iron and steel and of ferro-alloys	86.9	4.6	X	X
55 24.34 Cold drawing of wire	2.1	-	X	X
56 24.41 Precious metals production	9.6	9.6	X	X
57 24.42 Aluminium production	0.7	-	X	X
58 24.51 Casting of iron	0.3	-	X	X
59 24.52 Casting of steel	0.1	0.1	X	X
60 24.53 Casting of light metals	0.1	0.0	X	X
61 25.11 Manufacture of metal structures and parts of structures	50.5	4.2	X	X
62 25.12 Manufacture of doors and windows of metal	1.9	0.6	X	X
63 25.21 Manufacture of central heating radiators and boilers	31.2	-	X	X
64 25.40 Manufacture of weapons and ammunition	2.2	0.0	X	X
65 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	1.8	0.0	X	X
66 25.61 Treatment and coating of metals	0.8	-	X	X
67 25.62 Machining	1.8	0.4	X	X
68 25.71 Manufacture of cutlery	0.1	-	X	X
69 25.73 Manufacture of tools	0.1	-	X	X
70 25.99 Manufacture of other fabricated metal products n.e.c.	12.1	1.5	X	X
71 26.11 Manufacture of electronic components	4.1	0.6	X	X
72 26.20 Manufacture of computers and peripheral equipment	11.5	0.0	X	X
73 26.51 Manufacture of instruments and appliances for measuring, testing and navigation	89.4	0.0	X	X
74 26.70 Manufacture of optical instruments and photographic equipment	28.3	0.6	X	X
75 27.11 Manufacture of electric motors, generators and transformers	6.7	3.1	X	X
76 27.12 Manufacture of electricity distribution and control apparatus	65.6	52.4	X	X
77 27.20 Manufacture of batteries and accumulators	3.3	-	X	X
78 27.32 Manufacture of other electronic and electric wires and cables	0.1	0.1	X	X
79 27.40 Manufacture of electric lighting equipment	131.8	1.6	X	X
80 27.52 Manufacture of non-electric domestic appliances	0.2	-	X	X

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		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
81	27.90 Manufacture of other electrical equipment	32.0	1.5	X	X
82	28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	18.5	10.2	X	X
83	28.15 Manufacture of bearings, gears, gearing and driving elements	0.3	-	X	X
84	28.21 Manufacture of ovens, furnaces and furnace burners	0.4	0.0	X	X
85	28.22 Manufacture of lifting and handling equipment	3.2	0.4	X	X
86	28.29 Manufacture of other general-purpose machinery n.e.c.	1.3	0.0	X	X
87	28.30 Manufacture of agricultural and forestry machinery	19.1	0.0	X	X
88	28.41 Manufacture of metal forming machinery	1.5	0.0	X	X
89	28.49 Manufacture of other machine tools	2.8	0.1	X	X
90	28.91 Manufacture of machinery for metallurgy	12.4	0.5	X	X
91	28.92 Manufacture of machinery for mining, quarrying and construction	2.3	-	X	X
92	28.93 Manufacture of machinery for food, beverage and tobacco processing	12.6	1.4	X	X
93	28.94 Manufacture of machinery for textile, apparel and leather production	0.1	0.1	X	X
94	28.95 Manufacture of machinery for paper and paperboard production	32.9	1.9	X	X
95	28.99 Manufacture of other special-purpose machinery n.e.c.	6.8	2.7	X	X
96	29.10 Manufacture of motor vehicles	407.6	43.2	X	X
97	29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	95.2	-	X	X
98	29.31 Manufacture of electrical and electronic equipment for motor vehicles	20.4	0.0	X	X
99	29.32 Manufacture of other parts and accessories for motor vehicles	5.4	5.3	X	X
100	30.20 Manufacture of railway locomotives and rolling stock	65.3	21.8	X	X
101	30.30 Manufacture of air and spacecraft and related machinery	32.2	0.0	X	X
102	30.99 Manufacture of other transport equipment n.e.c.	15.8	-	X	X
103	31.09 Manufacture of other furniture	0.5	-	X	X

	y	z	aa	ab
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
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	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
104 32.40 Manufacture of games and toys	0.1	-	X	X
105 32.50 Manufacture of medical and dental instruments and supplies	188.0	-	X	X
106 32.99 Other manufacturing n.e.c.	6.3	0.0	X	X
107 33.12 Repair of machinery	0.1	0.1	X	X
108 33.13 Repair of electronic and optical equipment	1.1	-	X	X
109 35.11 Production of electricity	6 700.9	3 649.7	X	X
110 35.12 Transmission of electricity	1.3	1.3	X	X
111 35.13 Distribution of electricity	4.2	1.5	X	X
112 35.23 Trade of gas through mains	0.9	0.8	X	X
113 35.30 Steam and air conditioning supply	2.9	2.9	X	X
114 36.00 Water collection, treatment and supply	24.8	14.3	X	X
115 38.11 Collection of non-hazardous waste	0.1	0.1	X	X
116 38.22 Treatment and disposal of hazardous waste	0.1	-	X	X
117 38.32 Recovery of sorted materials	6.0	0.0	X	X
118 39.00 Remediation activities and other waste management services	0.7	0.0	X	X
119 41.10 Development of building projects	60.4	0.0	X	X
120 41.20 Construction of residential and non-residential buildings	31.0	3.7	X	X
121 42.11 Construction of roads and motorways	24.3	10.2	X	X
122 42.12 Construction of railways and underground railways	5.8	0.0	X	X
123 42.21 Construction of utility projects for fluids	2.7	-	X	X
124 42.91 Construction of water projects	8.1	-	X	X
125 42.99 Construction of other civil engineering projects n.e.c.	48.6	4.2	X	X
126 43.12 Site preparation	2.5	0.5	X	X
127 43.21 Electrical installation	19.9	13.1	X	X
128 43.22 Plumbing, heat and air-conditioning installation	0.6	0.0	X	X
129 43.29 Other construction installation	44.1	28.6	X	X
130 43.91 Roofing activities	0.1	-	X	X
131 43.99 Other specialised construction activities n.e.c.	33.5	3.2	X	X
132 45.11 Sale of cars and light motor vehicles	0.5	0.0	X	X
133 45.19 Sale of other motor vehicles	0.4	0.0	X	X

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		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the Turnover KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
134	45.20 Maintenance and repair of motor vehicles	3.1	-	X	X
135	45.31 Wholesale trade of motor vehicle parts and accessories	0.1	0.0	X	X
136	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	5.5	-	X	X
137	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	10.9	8.8	X	X
138	46.32 Wholesale of meat and meat products	0.1	-	X	X
139	46.39 Non-specialised wholesale of food, beverages and tobacco	10.2	0.0	X	X
140	46.42 Wholesale of clothing and footwear	0.2	0.0	X	X
141	46.43 Wholesale of electrical household appliances	2.5	0.0	X	X
142	46.45 Wholesale of perfume and cosmetics	3.5	0.0	X	X
143	46.49 Wholesale of other household goods	0.5	-	X	X
144	46.69 Wholesale of other machinery and equipment	10.4	0.0	X	X
145	46.71 Wholesale of solid, liquid and gaseous fuels and related products	4.1	0.4	X	X
146	46.72 Wholesale of metals and metal ores	34.4	5.3	X	X
147	46.73 Wholesale of wood, construction materials and sanitary equipment	5.0	0.0	X	X
148	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.9	-	X	X
149	46.75 Wholesale of chemical products	16.6	0.3	X	X
150	46.76 Wholesale of other intermediate products	0.6	0.0	X	X
151	46.90 Non-specialised wholesale trade	18.8	2.2	X	X
152	47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	9.4	0.0	X	X
153	47.19 Other retail sale in non-specialised stores	0.2	-	X	X
154	47.21 Retail sale of fruit and vegetables in specialised stores	0.1	0.0	X	X
155	47.22 Retail sale of meat and meat products in specialised stores	1.5	-	X	X
156	47.29 Other retail sale of food in specialised stores	9.3	-	X	X
157	47.30 Retail sale of automotive fuel in specialised stores	1.0	-	X	X

	y	z	aa	ab
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the Turnover KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
158 47.41 Retail sale of computers, peripheral units and software in specialised stores	1.2	-	X	X
159 47.43 Retail sale of audio and video equipment in specialised stores	0.5	-	X	X
160 47.51 Retail sale of textiles in specialised stores	2.5	-	X	X
161 47.52 Retail sale of hardware, paints and glass in specialised stores	0.1	-	X	X
162 47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.2	-	X	X
163 47.72 Retail sale of footwear and leather goods in specialised stores	0.4	0.0	X	X
164 47.73 Dispensing chemist in specialised stores	1.1	-	X	X
165 47.78 Other retail sale of new goods in specialised stores	31.1	-	X	X
166 47.91 Retail sale via mail order houses or via Internet	4.5	-	X	X
167 49.10 Passenger rail transport, interurban	295.0	111.2	X	X
168 49.20 Freight rail transport	43.4	0.0	X	X
169 49.31 Urban and suburban passenger land transport	13.6	0.0	X	X
170 49.39 Other passenger land transport n.e.c.	3.3	0.5	X	X
171 49.41 Freight transport by road	4.9	0.0	X	X
172 51.10 Passenger air transport	959.8	-	X	X
173 51.21 Freight air transport	26.0	-	X	X
174 52.10 Warehousing and storage	0.4	-	X	X
175 52.21 Service activities incidental to land transportation	8.5	3.1	X	X
176 52.22 Service activities incidental to water transportation	3.5	-	X	X
177 52.23 Service activities incidental to air transportation	204.2	13.0	X	X
178 52.29 Other transportation support activities	37.7	0.0	X	X
179 53.20 Other postal and courier activities	132.7	29.4	X	X
180 55.10 Hotels and similar accommodation	86.8	0.0	X	X
181 55.20 Holiday and other short-stay accommodation	1.0	-	X	X
182 56.10 Restaurants and mobile food service activities	0.6	-	X	X
183 56.21 Event catering activities	0.4	-	X	X
184 56.29 Other food service activities	0.7	-	X	X

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	[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
185 59.11 Motion picture, video and television programme production activities	29.6	0.6	X	X
186 60.20 Television programming and broadcasting activities	1.1	1.0	X	X
187 61.10 Wired telecommunications activities	0.6	0.1	X	X
188 61.20 Wireless telecommunications activities	0.3	0.1	X	X
189 61.90 Other telecommunications activities	27.6	0.6	X	X
190 62.01 Computer programming activities	0.1	0.0	X	X
191 62.02 Computer consultancy activities	335.5	8.9	X	X
192 62.09 Other information technology and computer service activities	2.5	0.0	X	X
193 63.11 Data processing, hosting and related activities	10.6	8.9	X	X
194 63.12 Web portals	1.0	1.0	X	X
195 64.99 Other financial service activities, except insurance and pension funding n.e.c.	23.1	5.2	X	X
196 66.19 Other activities auxiliary to financial services, except insurance and pension funding	3.8	0.8	X	X
197 68.10 Buying and selling of own real estate	835.3	1.0	X	X
198 68.20 Renting and operating of own or leased real estate	6 121.1	2.6	X	X
199 68.31 Real estate agencies	108.8	0.0	X	X
200 68.32 Management of real estate on a fee or contract basis	1 397.2	0.0	X	X
201 69.10 Legal activities	0.9	-	X	X
202 70.10 Activities of head offices	482.8	96.6	X	X
203 70.22 Business and other management consultancy activities	9.7	0.1	X	X
204 71.11 Architectural activities	0.9	-	X	X
205 71.12 Engineering activities and related technical consultancy	11.5	10.7	X	X
206 71.20 Technical testing and analysis	23.2	0.0	X	X
207 72.19 Other research and experimental development on natural sciences and engineering	3.4	-	X	X
208 73.12 Media representation	1.1	-	X	X
209 74.20 Photographic activities	1.8	-	X	X
210 74.90 Other professional, scientific and technical activities n.e.c.	74.4	0.0	X	X
211 75.00 Veterinary activities	7.3	-	X	X
212 77.11 Renting and leasing of cars and light motor vehicles	11.4	1.4	X	X

	y	z	aa	ab	
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
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		
	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹	million €	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹	
213	77.12 Renting and leasing of trucks	4.3	-	X	X
214	77.29 Renting and leasing of other personal and household goods	0.1	-	X	X
215	77.31 Renting and leasing of agricultural machinery and equipment	63.3	-	X	X
216	77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	9.3	-	X	X
217	79.12 Tour operator activities	6.7	-	X	X
218	80.10 Private security activities	8.1	0.0	X	X
219	81.22 Other building and industrial cleaning activities	0.2	-	X	X
220	81.30 Landscape service activities	0.6	-	X	X
221	82.99 Other business support service activities n.e.c.	46.6	2.6	X	X
222	85.10 Pre-primary education	0.8	-	X	X
223	86.10 Hospital activities	1.0	-	X	X
224	86.22 Specialist medical practice activities	4.7	-	X	X
225	86.90 Other human health activities	0.5	-	X	X
226	87.90 Other residential care activities	1.4	-	X	X
227	90.02 Support activities to performing arts	0.1	-	X	X
228	93.11 Operation of sports facilities	11.1	-	X	X
229	93.21 Activities of amusement parks and theme parks	14.7	-	X	X
230	93.29 Other amusement and recreation activities	6.5	-	X	X
231	94.99 Activities of other membership organisations n.e.c.	9.6	-	X	X
232	96.01 Washing and (dry-)cleaning of textile and fur products	0.3	-	X	X
233	96.09 Other personal service activities n.e.c.	121.9	0.0	X	X

¹ Only sectors / NACE codes with taxonomy-eligible exposures > €0.1 million (rounded) are shown in the template.

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

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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	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Breakdown by sector - NACE 4 digits level (code and label) ¹		million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CAA)	million €	Of which environ- mentally sustainable (CAA)
1	01.30 Plant propagation	0.4	-	X	X	-	-	X	X
2	01.50 Mixed farming	20.0	-	X	X	-	-	X	X
3	01.61 Support activities for crop production	0.5	-	X	X	-	-	X	X
4	01.63 Post-harvest crop activities	3.3	-	X	X	-	-	X	X
5	02.40 Support services to forestry	0.1	-	X	X	-	-	X	X
6	06.10 Extraction of crude petroleum	12.2	7.4	X	X	-	-	X	X
7	07.29 Mining of other non-ferrous metal ores	3.6	0.1	X	X	0.1	-	X	X
8	08.12 Operation of gravel and sand pits; mining of clays and kaolin	0.6	0.2	X	X	-	-	X	X
9	10.13 Production of meat and poultry meat products	0.1	-	X	X	0.0	-	X	X
10	10.32 Manufacture of fruit and vegetable juice	0.2	-	X	X	-	-	X	X
11	10.39 Other processing and preserving of fruit and vegetables	5.4	0.0	X	X	-	-	X	X
12	10.51 Operation of dairies and cheese making	20.0	0.0	X	X	-	-	X	X
13	10.61 Manufacture of grain mill products	18.7	-	X	X	-	-	X	X
14	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	1.8	-	X	X	-	-	X	X
15	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	0.5	0.2	X	X	-	-	X	X
16	10.82 Manufacture of cocoa, chocolate and sugar confectionery	0.2	-	X	X	-	-	X	X
17	10.86 Manufacture of homogenised food preparations and dietetic food	0.6	-	X	X	-	-	X	X
18	10.89 Manufacture of other food products n.e.c.	0.1	-	X	X	0.0	-	X	X
19	11.01 Distilling, rectifying and blending of spirits	0.9	-	X	X	-	-	X	X
20	11.02 Manufacture of wine from grape	0.3	-	X	X	-	-	X	X
21	11.05 Manufacture of beer	8.8	-	X	X	-	-	X	X
22	13.99 Manufacture of other textiles n.e.c.	0.2	-	X	X	-	-	X	X
23	14.19 Manufacture of other wearing apparel and accessories	47.1	-	X	X	-	-	X	X
24	16.10 Sawmilling and planing of wood	29.5	4.8	X	X	-	-	X	X
25	16.21 Manufacture of veneer sheets and wood-based panels	31.4	0.0	X	X	-	-	X	X
26	16.23 Manufacture of other builders' carpentry and joinery	0.9	0.0	X	X	-	-	X	X
27	16.24 Manufacture of wooden containers	10.6	-	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	
	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CAA)	million €	Of which environ- mentally sustainable (CAA)
Breakdown by sector - NACE 4 digits level (code and label) ¹								
28 16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.3	0.1	X	X	-	-	X	X
29 17.12 Manufacture of paper and paperboard	0.6	0.3	X	X	-	-	X	X
30 17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	6.0	1.3	X	X	-	-	X	X
31 17.22 Manufacture of household and sanitary goods and of toilet requisites	0.2	-	X	X	-	-	X	X
32 17.23 Manufacture of paper stationery	1.4	-	X	X	-	-	X	X
33 17.24 Manufacture of wallpaper	12.7	0.1	X	X	-	-	X	X
34 18.12 Other printing	18.0	-	X	X	-	-	X	X
35 18.13 Pre-press and pre-media services	0.6	-	X	X	-	-	X	X
36 19.20 Manufacture of refined petroleum products	28.5	0.3	X	X	0.2	0.1	X	X
37 20.13 Manufacture of other inorganic basic chemicals	0.7	0.0	X	X	0.1	-	X	X
38 20.14 Manufacture of other organic basic chemicals	0.9	-	X	X	0.9	-	X	X
39 20.15 Manufacture of fertilisers and nitrogen compounds	0.2	0.0	X	X	0.0	0.0	X	X
40 20.16 Manufacture of plastics in primary forms	7.0	0.0	X	X	0.3	-	X	X
41 20.17 Manufacture of synthetic rubber in primary forms	13.0	-	X	X	-	-	X	X
42 20.20 Manufacture of pesticides and other agrochemical products	0.9	-	X	X	-	-	X	X
43 20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.7	0.0	X	X	-	-	X	X
44 20.59 Manufacture of other chemical products n.e.c.	52.1	1.4	X	X	-	-	X	X
45 20.60 Manufacture of man-made fibres	64.8	0.0	X	X	-	-	X	X
46 21.10 Manufacture of basic pharmaceutical products	103.8	13.7	X	X	-	-	X	X
47 21.20 Manufacture of pharmaceutical preparations	28.5	0.0	X	X	0.1	-	X	X
48 22.21 Manufacture of plastic plates, sheets, tubes and profiles	0.8	0.4	X	X	-	-	X	X
49 22.22 Manufacture of plastic packing goods	10.3	1.7	X	X	1.5	-	X	X
50 22.23 Manufacture of builders' ware of plastic	5.4	-	X	X	-	-	X	X
51 22.29 Manufacture of other plastic products	5.5	0.0	X	X	0.0	-	X	X
52 23.11 Manufacture of flat glass	1.4	1.3	X	X	-	-	X	X
53 23.13 Manufacture of hollow glass	2.5	2.5	X	X	1.8	-	X	X
54 23.14 Manufacture of glass fibres	2.1	-	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	
	[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 (CAA)	million €	Of which environ- mentally sustainable (CAA)
Breakdown by sector - NACE 4 digits level (code and label) ¹								
55 23.19 Manufacture and processing of other glass, including technical glassware	0.1	-	X	X	-	-	X	X
56 23.20 Manufacture of refractory products	0.1	-	X	X	-	-	X	X
57 23.32 Manufacture of bricks, tiles and construction products, in baked clay	11.1	7.7	X	X	-	-	X	X
58 23.44 Manufacture of other technical ceramic products	0.3	-	X	X	-	-	X	X
59 23.51 Manufacture of cement	49.4	7.9	X	X	-	-	X	X
60 23.61 Manufacture of concrete products for construction purposes	0.1	0.0	X	X	-	-	X	X
61 23.91 Production of abrasive products	0.1	0.1	X	X	-	-	X	X
62 24.10 Manufacture of basic iron and steel and of ferro-alloys	74.6	13.9	X	X	19.1	0.0	X	X
63 24.34 Cold drawing of wire	2.1	-	X	X	-	-	X	X
64 24.41 Precious metals production	80.0	80.0	X	X	-	-	X	X
65 24.42 Aluminium production	0.7	-	X	X	-	-	X	X
66 24.44 Copper production	1.8	1.3	X	X	-	-	X	X
67 24.51 Casting of iron	0.3	-	X	X	-	-	X	X
68 24.52 Casting of steel	0.1	0.1	X	X	-	-	X	X
69 24.53 Casting of light metals	0.1	0.0	X	X	0.0	0.0	X	X
70 25.11 Manufacture of metal structures and parts of structures	32.7	3.9	X	X	12.4	-	X	X
71 25.12 Manufacture of doors and windows of metal	3.3	0.1	X	X	-	-	X	X
72 25.21 Manufacture of central heating radiators and boilers	31.2	-	X	X	-	-	X	X
73 25.40 Manufacture of weapons and ammunition	2.2	0.0	X	X	0.0	-	X	X
74 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	2.0	0.1	X	X	-	-	X	X
75 25.61 Treatment and coating of metals	0.8	-	X	X	-	-	X	X
76 25.62 Machining	1.8	0.3	X	X	-	-	X	X
77 25.71 Manufacture of cutlery	0.1	-	X	X	-	-	X	X
78 25.73 Manufacture of tools	0.1	-	X	X	-	-	X	X
79 25.99 Manufacture of other fabricated metal products n.e.c.	11.6	1.4	X	X	-	-	X	X
80 26.11 Manufacture of electronic components	27.5	0.1	X	X	0.0	-	X	X
81 26.20 Manufacture of computers and peripheral equipment	21.8	0.3	X	X	0.0	-	X	X
82 26.30 Manufacture of communication equipment	1.3	0.0	X	X	-	-	X	X
83 26.51 Manufacture of instruments and appliances for measuring, testing and navigation	124.5	0.5	X	X	0.0	-	X	X
84 26.70 Manufacture of optical instruments and photographic equipment	28.4	0.4	X	X	0.0	-	X	X

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Based on the CapEx KPI	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
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	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CAA)	million €	Of which environ- mentally sustainable (CAA)
Breakdown by sector - NACE 4 digits level (code and label) ¹								
85 27.11 Manufacture of electric motors, generators and transformers	9.2	6.3	X	X	-	-	X	X
86 27.12 Manufacture of electricity distribution and control apparatus	72.2	53.1	X	X	0.0	-	X	X
87 27.20 Manufacture of batteries and accumulators	3.3	-	X	X	-	-	X	X
88 27.32 Manufacture of other electronic and electric wires and cables	0.1	0.1	X	X	0.1	-	X	X
89 27.40 Manufacture of electric lighting equipment	130.3	2.1	X	X	-	-	X	X
90 27.52 Manufacture of non-electric domestic appliances	0.2	0.0	X	X	-	-	X	X
91 27.90 Manufacture of other electrical equipment	49.5	16.7	X	X	-	-	X	X
92 28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	27.3	19.7	X	X	-	-	X	X
93 28.15 Manufacture of bearings, gears, gearing and driving elements	0.3	-	X	X	-	-	X	X
94 28.21 Manufacture of ovens, furnaces and furnace burners	0.4	0.0	X	X	-	-	X	X
95 28.22 Manufacture of lifting and handling equipment	0.5	0.1	X	X	0.4	-	X	X
96 28.29 Manufacture of other general-purpose machinery n.e.c.	1.6	0.0	X	X	0.0	-	X	X
97 28.30 Manufacture of agricultural and forestry machinery	19.1	0.0	X	X	-	-	X	X
98 28.41 Manufacture of metal forming machinery	3.5	0.0	X	X	0.0	-	X	X
99 28.49 Manufacture of other machine tools	2.8	0.1	X	X	0.0	-	X	X
100 28.91 Manufacture of machinery for metallurgy	9.0	1.1	X	X	-	-	X	X
101 28.92 Manufacture of machinery for mining, quarrying and construction	2.3	-	X	X	-	-	X	X
102 28.93 Manufacture of machinery for food, beverage and tobacco processing	19.0	5.5	X	X	-	-	X	X
103 28.94 Manufacture of machinery for textile, apparel and leather production	0.1	0.1	X	X	-	-	X	X
104 28.95 Manufacture of machinery for paper and paperboard production	32.3	0.5	X	X	0.3	-	X	X
105 28.99 Manufacture of other special-purpose machinery n.e.c.	6.5	1.9	X	X	0.2	-	X	X
106 29.10 Manufacture of motor vehicles	420.8	97.7	X	X	20.3	14.2	X	X
107 29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi- trailers	30.8	11.5	X	X	28.7	11.5	X	X

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Based on the CapEx KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	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	
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	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CCM)	million €	Of which environ- mentally sustainable (CAA)	million €	Of which environ- mentally sustainable (CAA)
108 29.31 Manufacture of electrical and electronic equipment for motor vehicles	20.4	0.0	X	X	-	-	X	X
109 29.32 Manufacture of other parts and accessories for motor vehicles	5.5	5.5	X	X	0.0	0.0	X	X
110 30.20 Manufacture of railway locomotives and rolling stock	63.3	19.6	X	X	-	-	X	X
111 30.30 Manufacture of air and spacecraft and related machinery	32.3	0.0	X	X	0.0	-	X	X
112 30.99 Manufacture of other transport equipment n.e.c.	4.0	-	X	X	-	-	X	X
113 31.09 Manufacture of other furniture	0.5	-	X	X	-	-	X	X
114 32.40 Manufacture of games and toys	0.1	-	X	X	-	-	X	X
115 32.50 Manufacture of medical and dental instruments and supplies	75.6	0.9	X	X	1.9	-	X	X
116 32.99 Other manufacturing n.e.c.	6.5	0.0	X	X	-	-	X	X
117 33.12 Repair of machinery	0.1	0.1	X	X	-	-	X	X
118 33.13 Repair of electronic and optical equipment	1.1	-	X	X	-	-	X	X
119 35.11 Production of electricity	6 984.5	3 968.3	X	X	77.7	2.6	X	X
120 35.12 Transmission of electricity	5.0	4.9	X	X	-	-	X	X
121 35.13 Distribution of electricity	3.5	1.6	X	X	0.0	-	X	X
122 35.23 Trade of gas through mains	4.4	4.4	X	X	-	-	X	X
123 35.30 Steam and air conditioning supply	11.1	10.8	X	X	-	-	X	X
124 36.00 Water collection, treatment and supply	18.7	14.8	X	X	-	-	X	X
125 37.00 Sewerage	0.1	0.1	X	X	-	-	X	X
126 38.11 Collection of non- hazardous waste	0.1	0.1	X	X	-	-	X	X
127 38.22 Treatment and disposal of hazardous waste	0.1	-	X	X	-	-	X	X
128 38.32 Recovery of sorted materials	6.0	0.0	X	X	0.0	-	X	X
129 39.00 Remediation activities and other waste management services	0.7	0.0	X	X	0.0	-	X	X
130 41.10 Development of building projects	59.5	0.0	X	X	0.7	-	X	X
131 41.20 Construction of residential and non-residential buildings	18.9	3.1	X	X	1.8	0.0	X	X
132 42.11 Construction of roads and motorways	15.2	5.9	X	X	0.0	-	X	X
133 42.12 Construction of railways and underground railways	5.8	0.0	X	X	0.0	-	X	X
134 42.21 Construction of utility projects for fluids	2.7	-	X	X	-	-	X	X
135 42.91 Construction of water projects	8.1	-	X	X	-	-	X	X
136 42.99 Construction of other civil engineering projects n.e.c.	22.6	6.1	X	X	8.8	0.3	X	X
137 43.12 Site preparation	1.2	0.4	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) ¹	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 (CAA)	million €	Of which environ- mentally sustainable (CAA)
138	43.21 Electrical installation	20.2	13.3	X	X	0.0	0.0	X	X
139	43.22 Plumbing, heat and air- conditioning installation	0.6	0.0	X	X	-	-	X	X
140	43.29 Other construction installation	40.7	12.6	X	X	-	-	X	X
141	43.91 Roofing activities	0.1	-	X	X	-	-	X	X
142	43.99 Other specialised construction activities n.e.c.	11.8	0.7	X	X	3.5	-	X	X
143	45.11 Sale of cars and light motor vehicles	0.5	0.0	X	X	-	-	X	X
144	45.19 Sale of other motor vehicles	0.4	0.0	X	X	0.0	-	X	X
145	45.20 Maintenance and repair of motor vehicles	3.2	-	X	X	-	-	X	X
146	45.31 Wholesale trade of motor vehicle parts and accessories	0.1	-	X	X	-	-	X	X
147	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	2.2	-	X	X	2.2	-	X	X
148	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	102.8	96.0	X	X	-	-	X	X
149	46.32 Wholesale of meat and meat products	0.1	-	X	X	-	-	X	X
150	46.39 Non-specialised wholesale of food, beverages and tobacco	14.9	0.0	X	X	-	-	X	X
151	46.42 Wholesale of clothing and footwear	0.2	0.0	X	X	1.1	0.1	X	X
152	46.43 Wholesale of electrical household appliances	2.5	0.0	X	X	0.0	-	X	X
153	46.45 Wholesale of perfume and cosmetics	3.3	0.0	X	X	-	-	X	X
154	46.49 Wholesale of other household goods	2.3	-	X	X	-	-	X	X
155	46.69 Wholesale of other machinery and equipment	6.6	0.0	X	X	0.0	0.0	X	X
156	46.71 Wholesale of solid, liquid and gaseous fuels and related products	7.4	1.6	X	X	0.0	-	X	X
157	46.72 Wholesale of metals and metal ores	66.0	29.9	X	X	-	-	X	X
158	46.73 Wholesale of wood, construction materials and sanitary equipment	5.0	0.0	X	X	-	-	X	X
159	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.9	-	X	X	-	-	X	X
160	46.75 Wholesale of chemical products	22.6	0.3	X	X	0.0	-	X	X
161	46.76 Wholesale of other intermediate products	0.6	0.0	X	X	0.0	-	X	X
162	46.90 Non-specialised wholesale trade	28.5	8.3	X	X	-	-	X	X
163	47.11 Retail sale in non- specialised stores with food, beverages or tobacco predominating	10.6	0.0	X	X	1.2	0.0	X	X

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	[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 (CAA)	million €	Of which environ- mentally sustainable (CAA)
164 47.19 Other retail sale in non-specialised stores	0.2	0.0	X	X	-	-	X	X
165 47.21 Retail sale of fruit and vegetables in specialised stores	23.0	2.3	X	X	1.6	-	X	X
166 47.22 Retail sale of meat and meat products in specialised stores	1.5	-	X	X	-	-	X	X
167 47.29 Other retail sale of food in specialised stores	9.3	-	X	X	-	-	X	X
168 47.30 Retail sale of automotive fuel in specialised stores	1.0	-	X	X	-	-	X	X
169 47.43 Retail sale of audio and video equipment in specialised stores	0.5	-	X	X	-	-	X	X
170 47.51 Retail sale of textiles in specialised stores	6.4	1.1	X	X	-	-	X	X
171 47.52 Retail sale of hardware, paints and glass in specialised stores	5.9	-	X	X	-	-	X	X
172 47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.2	0.0	X	X	-	-	X	X
173 47.61 Retail sale of books in specialised stores	0.1	0.0	X	X	-	-	X	X
174 47.72 Retail sale of footwear and leather goods in specialised stores	0.4	0.0	X	X	0.5	0.0	X	X
175 47.73 Dispensing chemist in specialised stores	1.1	-	X	X	-	-	X	X
176 47.78 Other retail sale of new goods in specialised stores	31.1	-	X	X	-	-	X	X
177 47.91 Retail sale via mail order houses or via Internet	5.9	0.0	X	X	0.0	0.0	X	X
178 49.10 Passenger rail transport, interurban	140.2	136.6	X	X	153.0	0.0	X	X
179 49.20 Freight rail transport	43.4	0.0	X	X	0.0	0.0	X	X
180 49.31 Urban and suburban passenger land transport	13.6	0.0	X	X	0.0	0.0	X	X
181 49.39 Other passenger land transport n.e.c.	2.4	0.3	X	X	0.1	-	X	X
182 49.41 Freight transport by road	4.9	0.0	X	X	0.0	0.0	X	X
183 51.10 Passenger air transport	960.7	0.0	X	X	-	-	X	X
184 51.21 Freight air transport	26.0	-	X	X	-	-	X	X
185 52.10 Warehousing and storage	0.4	-	X	X	-	-	X	X
186 52.21 Service activities incidental to land transportation	16.0	9.2	X	X	-	-	X	X
187 52.22 Service activities incidental to water transportation	3.5	-	X	X	-	-	X	X
188 52.23 Service activities incidental to air transportation	147.8	46.5	X	X	142.0	-	X	X
189 52.29 Other transportation support activities	36.5	0.0	X	X	0.0	0.0	X	X
190 53.20 Other postal and courier activities	134.4	60.3	X	X	50.7	0.0	X	X
191 55.10 Hotels and similar accommodation	129.9	0.0	X	X	0.0	-	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) ¹	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 (CAA)	million €	Of which environ- mentally sustainable (CAA)
192	55.20 Holiday and other short-stay accommodation	1.0	-	X	X	-	-	X	X
193	56.10 Restaurants and mobile food service activities	0.6	0.0	X	X	-	-	X	X
194	56.21 Event catering activities	0.4	-	X	X	-	-	X	X
195	56.29 Other food service activities	0.7	-	X	X	-	-	X	X
196	59.11 Motion picture, video and television programme production activities	42.9	1.1	X	X	0.4	0.0	X	X
197	60.20 Television programming and broadcasting activities	7.6	0.2	X	X	0.1	0.1	X	X
198	61.10 Wired telecommunications activities	0.6	0.0	X	X	0.0	0.0	X	X
199	61.20 Wireless telecommunications activities	0.3	0.0	X	X	0.0	0.0	X	X
200	61.90 Other telecommunications activities	18.1	0.5	X	X	0.7	-	X	X
201	62.01 Computer programming activities	0.1	0.0	X	X	0.0	0.0	X	X
202	62.02 Computer consultancy activities	204.4	24.6	X	X	9.4	9.4	X	X
203	62.09 Other information technology and computer service activities	15.2	1.0	X	X	6.8	0.9	X	X
204	63.11 Data processing, hosting and related activities	11.2	8.7	X	X	0.0	0.0	X	X
205	63.12 Web portals	0.1	0.1	X	X	27.0	24.7	X	X
206	64.99 Other financial service activities, except insurance and pension funding n.e.c.	35.4	32.5	X	X	0.4	0.3	X	X
207	66.19 Other activities auxiliary to financial services, except insurance and pension funding	16.2	14.8	X	X	-	-	X	X
208	68.10 Buying and selling of own real estate	851.0	3.5	X	X	0.0	-	X	X
209	68.20 Renting and operating of own or leased real estate	6 108.4	1.5	X	X	0.0	-	X	X
210	68.31 Real estate agencies	108.8	0.0	X	X	0.0	-	X	X
211	68.32 Management of real estate on a fee or contract basis	1 397.2	0.0	X	X	0.0	-	X	X
212	69.10 Legal activities	0.9	-	X	X	-	-	X	X
213	70.10 Activities of head offices	505.7	94.2	X	X	0.0	-	X	X
214	70.22 Business and other management consultancy activities	16.6	0.1	X	X	3.9	3.6	X	X
215	71.11 Architectural activities	0.9	-	X	X	-	-	X	X
216	71.12 Engineering activities and related technical consultancy	11.5	10.7	X	X	0.0	-	X	X
217	71.20 Technical testing and analysis	23.2	0.0	X	X	-	-	X	X
218	72.19 Other research and experimental development on natural sciences and engineering	3.4	-	X	X	-	-	X	X
219	73.11 Advertising agencies	0.5	0.0	X	X	0.0	0.0	X	X
220	73.12 Media representation	32.2	14.8	X	X	-	-	X	X
221	74.20 Photographic activities	1.8	-	X	X	-	-	X	X

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	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
Based on the CapEx KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	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 (CAA)	million €	Of which environ- mentally sustainable (CAA)
222 74.90 Other professional, scientific and technical activities n.e.c.	74.6	0.0	X	X	0.0	0.0	X	X
223 75.00 Veterinary activities	7.3	-	X	X	-	-	X	X
224 77.11 Renting and leasing of cars and light motor vehicles	12.3	3.9	X	X	0.0	-	X	X
225 77.12 Renting and leasing of trucks	4.3	-	X	X	-	-	X	X
226 77.29 Renting and leasing of other personal and household goods	0.1	-	X	X	-	-	X	X
227 77.31 Renting and leasing of agricultural machinery and equipment	63.3	-	X	X	-	-	X	X
228 77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	9.3	-	X	X	-	-	X	X
229 79.12 Tour operator activities	99.9	0.4	X	X	-	-	X	X
230 80.10 Private security activities	4.6	0.0	X	X	-	-	X	X
231 81.22 Other building and industrial cleaning activities	0.2	-	X	X	-	-	X	X
232 81.30 Landscape service activities	0.6	-	X	X	-	-	X	X
233 82.99 Other business support service activities n.e.c.	46.6	2.5	X	X	0.1	-	X	X
234 85.10 Pre-primary education	0.8	-	X	X	-	-	X	X
235 85.59 Other education n.e.c.	0.0	0.0	X	X	0.0	0.0	X	X
236 86.10 Hospital activities	1.0	-	X	X	-	-	X	X
237 86.22 Specialist medical practice activities	4.7	-	X	X	-	-	X	X
238 86.90 Other human health activities	0.5	-	X	X	-	-	X	X
239 87.90 Other residential care activities	1.4	-	X	X	-	-	X	X
240 90.02 Support activities to performing arts	0.1	-	X	X	-	-	X	X
241 93.11 Operation of sports facilities	4.2	-	X	X	-	-	X	X
242 93.21 Activities of amusement parks and theme parks	14.7	-	X	X	-	-	X	X
243 93.29 Other amusement and recreation activities	7.5	-	X	X	0.1	-	X	X
244 94.99 Activities of other membership organisations n.e.c.	9.6	-	X	X	-	-	X	X
245 96.01 Washing and (dry-)cleaning of textile and fur products	0.3	-	X	X	-	-	X	X
246 96.09 Other personal service activities n.e.c.	121.9	0.0	X	X	0.0	-	X	X

		i	j	k	l	m	n	o	p
		Water and marine resources (WTR)				Circular economy (CE)			
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) ¹		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (WTR)	million €	Of which environ- mentally sustainable (WTR)	million €	Of which environ- mentally sustainable (CE)	million €	Of which environ- mentally sustainable (CE)
1	01.30 Plant propagation	-	-	X	X	-	-	X	X
2	01.50 Mixed farming	-	-	X	X	-	-	X	X
3	01.61 Support activities for crop production	-	-	X	X	-	-	X	X
4	01.63 Post-harvest crop activities	-	-	X	X	-	-	X	X
5	02.40 Support services to forestry	-	-	X	X	-	-	X	X
6	06.10 Extraction of crude petroleum	-	-	X	X	-	-	X	X
7	07.29 Mining of other non-ferrous metal ores	-	-	X	X	0.2	-	X	X
8	08.12 Operation of gravel and sand pits; mining of clays and kaolin	0.0	-	X	X	0.2	-	X	X
9	10.13 Production of meat and poultry meat products	-	-	X	X	0.9	-	X	X
10	10.32 Manufacture of fruit and vegetable juice	-	-	X	X	-	-	X	X
11	10.39 Other processing and preserving of fruit and vegetables	-	-	X	X	-	-	X	X
12	10.51 Operation of dairies and cheese making	0.0	-	X	X	0.0	-	X	X
13	10.61 Manufacture of grain mill products	-	-	X	X	-	-	X	X
14	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-	X	X	-	-	X	X
15	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	-	-	X	X	-	-	X	X
16	10.82 Manufacture of cocoa, chocolate and sugar confectionery	-	-	X	X	-	-	X	X
17	10.86 Manufacture of homogenised food preparations and dietetic food	-	-	X	X	-	-	X	X
18	10.89 Manufacture of other food products n.e.c.	-	-	X	X	0.0	-	X	X
19	11.01 Distilling, rectifying and blending of spirits	-	-	X	X	-	-	X	X
20	11.02 Manufacture of wine from grape	-	-	X	X	-	-	X	X
21	11.05 Manufacture of beer	-	-	X	X	1.0	-	X	X
22	13.99 Manufacture of other textiles n.e.c.	-	-	X	X	-	-	X	X
23	14.19 Manufacture of other wearing apparel and accessories	-	-	X	X	-	-	X	X
24	16.10 Sawmilling and planing of wood	-	-	X	X	-	-	X	X
25	16.21 Manufacture of veneer sheets and wood-based panels	-	-	X	X	-	-	X	X
26	16.23 Manufacture of other builders' carpentry and joinery	-	-	X	X	-	-	X	X
27	16.24 Manufacture of wooden containers	-	-	X	X	-	-	X	X
28	16.29 Manufacture of other products of wood; manufacture of	-	-	X	X	-	-	X	X

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		Water and marine resources (WTR)				Circular economy (CE)			
Based on the CapEx KPI Breakdown by sector - NACE 4 digits level (code and label) ¹		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 (WTR)	million €	Of which environ- mentally sustainable (WTR)	million €	Of which environ- mentally sustainable (CE)	million €	Of which environ- mentally sustainable (CE)
	articles of cork, straw and plaiting materials								
29	17.12 Manufacture of paper and paperboard	-	-	X	X	-	-	X	X
30	17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	-	-	X	X	1.5	-	X	X
31	17.22 Manufacture of household and sanitary goods and of toilet requisites	-	-	X	X	0.0	-	X	X
32	17.23 Manufacture of paper stationery	-	-	X	X	-	-	X	X
33	17.24 Manufacture of wallpaper	-	-	X	X	-	-	X	X
34	18.12 Other printing	-	-	X	X	-	-	X	X
35	18.13 Pre-press and pre-media services	-	-	X	X	-	-	X	X
36	19.20 Manufacture of refined petroleum products	-	-	X	X	0.0	-	X	X
37	20.13 Manufacture of other inorganic basic chemicals	-	-	X	X	0.1	-	X	X
38	20.14 Manufacture of other organic basic chemicals	-	-	X	X	-	-	X	X
39	20.15 Manufacture of fertilisers and nitrogen compounds	-	-	X	X	0.0	-	X	X
40	20.16 Manufacture of plastics in primary forms	-	-	X	X	-	-	X	X
41	20.17 Manufacture of synthetic rubber in primary forms	-	-	X	X	-	-	X	X
42	20.20 Manufacture of pesticides and other agrochemical products	-	-	X	X	-	-	X	X
43	20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	-	-	X	X	0.0	-	X	X
44	20.59 Manufacture of other chemical products n.e.c.	-	-	X	X	0.0	-	X	X
45	20.60 Manufacture of man-made fibres	-	-	X	X	-	-	X	X
46	21.10 Manufacture of basic pharmaceutical products	-	-	X	X	0.0	-	X	X
47	21.20 Manufacture of pharmaceutical preparations	0.0	-	X	X	0.1	-	X	X
48	22.21 Manufacture of plastic plates, sheets, tubes and profiles	-	-	X	X	0.1	-	X	X
49	22.22 Manufacture of plastic packing goods	-	-	X	X	13.4	-	X	X
50	22.23 Manufacture of builders' ware of plastic	-	-	X	X	-	-	X	X
51	22.29 Manufacture of other plastic products	-	-	X	X	-	-	X	X
52	23.11 Manufacture of flat glass	-	-	X	X	-	-	X	X
53	23.13 Manufacture of hollow glass	-	-	X	X	1.3	-	X	X
54	23.14 Manufacture of glass fibres	-	-	X	X	-	-	X	X
55	23.19 Manufacture and processing of other glass, including technical glassware	-	-	X	X	-	-	X	X

		i	j	k	l	m	n	o	p
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	Water and marine resources (WTR)				Circular economy (CE)			
		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 (WTR)	million €	Of which environ- mentally sustainable (WTR)	million €	Of which environ- mentally sustainable (CE)	million €	Of which environ- mentally sustainable (CE)
56	23.20 Manufacture of refractory products	-	-	X	X	-	-	X	X
57	23.32 Manufacture of bricks, tiles and construction products, in baked clay	-	-	X	X	-	-	X	X
58	23.44 Manufacture of other technical ceramic products	-	-	X	X	-	-	X	X
59	23.51 Manufacture of cement	-	-	X	X	-	-	X	X
60	23.61 Manufacture of concrete products for construction purposes	-	-	X	X	-	-	X	X
61	23.91 Production of abrasive products	-	-	X	X	-	-	X	X
62	24.10 Manufacture of basic iron and steel and of ferro-alloys	-	-	X	X	1.6	-	X	X
63	24.34 Cold drawing of wire	-	-	X	X	-	-	X	X
64	24.41 Precious metals production	-	-	X	X	-	-	X	X
65	24.42 Aluminium production	-	-	X	X	0.0	-	X	X
66	24.44 Copper production	-	-	X	X	-	-	X	X
67	24.51 Casting of iron	-	-	X	X	-	-	X	X
68	24.52 Casting of steel	-	-	X	X	-	-	X	X
69	24.53 Casting of light metals	-	-	X	X	-	-	X	X
70	25.11 Manufacture of metal structures and parts of structures	0.0	-	X	X	0.0	-	X	X
71	25.12 Manufacture of doors and windows of metal	-	-	X	X	-	-	X	X
72	25.21 Manufacture of central heating radiators and boilers	-	-	X	X	-	-	X	X
73	25.40 Manufacture of weapons and ammunition	0.0	-	X	X	0.0	-	X	X
74	25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	-	-	X	X	0.0	-	X	X
75	25.61 Treatment and coating of metals	-	-	X	X	-	-	X	X
76	25.62 Machining	-	-	X	X	-	-	X	X
77	25.71 Manufacture of cutlery	-	-	X	X	-	-	X	X
78	25.73 Manufacture of tools	-	-	X	X	-	-	X	X
79	25.99 Manufacture of other fabricated metal products n.e.c.	4.7	-	X	X	0.0	-	X	X
80	26.11 Manufacture of electronic components	-	-	X	X	0.0	-	X	X
81	26.20 Manufacture of computers and peripheral equipment	-	-	X	X	-	-	X	X
82	26.30 Manufacture of communication equipment	-	-	X	X	0.4	-	X	X
83	26.51 Manufacture of instruments and appliances for measuring, testing and navigation	0.0	-	X	X	0.2	-	X	X
84	26.70 Manufacture of optical instruments and photographic equipment	-	-	X	X	0.0	-	X	X
85	27.11 Manufacture of electric motors, generators and transformers	-	-	X	X	0.0	-	X	X

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		Water and marine resources (WTR)				Circular economy (CE)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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 (WTR)	million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (CE)	million €	Of which environmentally sustainable (CE)
86	27.12 Manufacture of electricity distribution and control apparatus	0.0	-	X	X	0.3	-	X	X
87	27.20 Manufacture of batteries and accumulators	-	-	X	X	-	-	X	X
88	27.32 Manufacture of other electronic and electric wires and cables	0.0	-	X	X	0.0	-	X	X
89	27.40 Manufacture of electric lighting equipment	-	-	X	X	0.2	-	X	X
90	27.52 Manufacture of non-electric domestic appliances	-	-	X	X	-	-	X	X
91	27.90 Manufacture of other electrical equipment	-	-	X	X	0.1	-	X	X
92	28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	-	-	X	X	0.0	-	X	X
93	28.15 Manufacture of bearings, gears, gearing and driving elements	-	-	X	X	-	-	X	X
94	28.21 Manufacture of ovens, furnaces and furnace burners	-	-	X	X	-	-	X	X
95	28.22 Manufacture of lifting and handling equipment	-	-	X	X	0.1	-	X	X
96	28.29 Manufacture of other general-purpose machinery n.e.c.	-	-	X	X	0.0	-	X	X
97	28.30 Manufacture of agricultural and forestry machinery	-	-	X	X	0.0	-	X	X
98	28.41 Manufacture of metal forming machinery	-	-	X	X	2.2	-	X	X
99	28.49 Manufacture of other machine tools	-	-	X	X	0.0	-	X	X
100	28.91 Manufacture of machinery for metallurgy	-	-	X	X	2.8	-	X	X
101	28.92 Manufacture of machinery for mining, quarrying and construction	-	-	X	X	-	-	X	X
102	28.93 Manufacture of machinery for food, beverage and tobacco processing	-	-	X	X	0.0	-	X	X
103	28.94 Manufacture of machinery for textile, apparel and leather production	-	-	X	X	-	-	X	X
104	28.95 Manufacture of machinery for paper and paperboard production	-	-	X	X	0.0	-	X	X
105	28.99 Manufacture of other special-purpose machinery n.e.c.	0.0	-	X	X	0.1	-	X	X
106	29.10 Manufacture of motor vehicles	-	-	X	X	0.4	-	X	X
107	29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	-	-	X	X	25.5	-	X	X
108	29.31 Manufacture of electrical and electronic equipment for motor vehicles	-	-	X	X	-	-	X	X

	i	j	k	l	m	n	o	p
	Water and marine resources (WTR)				Circular economy (CE)			
Based on the CapEx KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	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 (WTR)	million €	Of which environ- mentally sustainable (WTR)	million €	Of which environ- mentally sustainable (CE)	million €	Of which environ- mentally sustainable (CE)
109 29.32 Manufacture of other parts and accessories for motor vehicles	-	-	X	X	-	-	X	X
110 30.20 Manufacture of railway locomotives and rolling stock	-	-	X	X	0.0	-	X	X
111 30.30 Manufacture of air and spacecraft and related machinery	0.0	-	X	X	0.0	-	X	X
112 30.99 Manufacture of other transport equipment n.e.c.	-	-	X	X	0.1	-	X	X
113 31.09 Manufacture of other furniture	-	-	X	X	-	-	X	X
114 32.40 Manufacture of games and toys	-	-	X	X	-	-	X	X
115 32.50 Manufacture of medical and dental instruments and supplies	-	-	X	X	33.0	-	X	X
116 32.99 Other manufacturing n.e.c.	-	-	X	X	-	-	X	X
117 33.12 Repair of machinery	-	-	X	X	-	-	X	X
118 33.13 Repair of electronic and optical equipment	-	-	X	X	-	-	X	X
119 35.11 Production of electricity	0.6	-	X	X	0.7	-	X	X
120 35.12 Transmission of electricity	0.0	-	X	X	0.0	-	X	X
121 35.13 Distribution of electricity	0.9	-	X	X	0.3	-	X	X
122 35.23 Trade of gas through mains	-	-	X	X	-	-	X	X
123 35.30 Steam and air conditioning supply	-	-	X	X	-	-	X	X
124 36.00 Water collection, treatment and supply	8.5	-	X	X	2.5	-	X	X
125 37.00 Sewerage	-	-	X	X	-	-	X	X
126 38.11 Collection of non- hazardous waste	0.0	-	X	X	0.0	-	X	X
127 38.22 Treatment and disposal of hazardous waste	-	-	X	X	-	-	X	X
128 38.32 Recovery of sorted materials	0.0	-	X	X	0.0	-	X	X
129 39.00 Remediation activities and other waste management services	0.0	-	X	X	0.0	-	X	X
130 41.10 Development of building projects	-	-	X	X	-	-	X	X
131 41.20 Construction of residential and non-residential buildings	0.0	-	X	X	0.0	-	X	X
132 42.11 Construction of roads and motorways	0.2	-	X	X	2.7	-	X	X
133 42.12 Construction of railways and underground railways	-	-	X	X	-	-	X	X
134 42.21 Construction of utility projects for fluids	-	-	X	X	-	-	X	X
135 42.91 Construction of water projects	-	-	X	X	-	-	X	X
136 42.99 Construction of other civil engineering projects n.e.c.	0.0	-	X	X	0.0	-	X	X
137 43.12 Site preparation	-	-	X	X	-	-	X	X
138 43.21 Electrical installation	0.0	-	X	X	0.0	-	X	X
139 43.22 Plumbing, heat and air- conditioning installation	0.0	-	X	X	0.0	-	X	X

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		Water and marine resources (WTR)				Circular economy (CE)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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 (WTR)	million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (CE)	million €	Of which environmentally sustainable (CE)
140	43.29 Other construction installation	0.0	-	X	X	0.0	-	X	X
141	43.91 Roofing activities	-	-	X	X	-	-	X	X
142	43.99 Other specialised construction activities n.e.c.	-	-	X	X	0.8	-	X	X
143	45.11 Sale of cars and light motor vehicles	-	-	X	X	-	-	X	X
144	45.19 Sale of other motor vehicles	-	-	X	X	-	-	X	X
145	45.20 Maintenance and repair of motor vehicles	-	-	X	X	-	-	X	X
146	45.31 Wholesale trade of motor vehicle parts and accessories	-	-	X	X	-	-	X	X
147	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	-	-	X	X	-	-	X	X
148	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	X	X	0.4	-	X	X
149	46.32 Wholesale of meat and meat products	-	-	X	X	-	-	X	X
150	46.39 Non-specialised wholesale of food, beverages and tobacco	-	-	X	X	0.0	-	X	X
151	46.42 Wholesale of clothing and footwear	-	-	X	X	-	-	X	X
152	46.43 Wholesale of electrical household appliances	-	-	X	X	0.0	-	X	X
153	46.45 Wholesale of perfume and cosmetics	-	-	X	X	-	-	X	X
154	46.49 Wholesale of other household goods	-	-	X	X	-	-	X	X
155	46.69 Wholesale of other machinery and equipment	0.0	-	X	X	6.5	-	X	X
156	46.71 Wholesale of solid, liquid and gaseous fuels and related products	-	-	X	X	0.0	-	X	X
157	46.72 Wholesale of metals and metal ores	-	-	X	X	0.1	-	X	X
158	46.73 Wholesale of wood, construction materials and sanitary equipment	-	-	X	X	-	-	X	X
159	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	-	-	X	X	0.0	-	X	X
160	46.75 Wholesale of chemical products	0.0	-	X	X	0.0	-	X	X
161	46.76 Wholesale of other intermediate products	-	-	X	X	0.0	-	X	X
162	46.90 Non-specialised wholesale trade	-	-	X	X	0.0	-	X	X
163	47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-	X	X	1.0	-	X	X
164	47.19 Other retail sale in non-specialised stores	-	-	X	X	-	-	X	X
165	47.21 Retail sale of fruit and vegetables in specialised stores	-	-	X	X	0.2	-	X	X

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		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (CE)	million €	Of which environmentally sustainable (CE)
166	47.22 Retail sale of meat and meat products in specialised stores	-	-	X	X	-	-	X	X
167	47.29 Other retail sale of food in specialised stores	-	-	X	X	-	-	X	X
168	47.30 Retail sale of automotive fuel in specialised stores	-	-	X	X	-	-	X	X
169	47.43 Retail sale of audio and video equipment in specialised stores	-	-	X	X	-	-	X	X
170	47.51 Retail sale of textiles in specialised stores	-	-	X	X	0.2	-	X	X
171	47.52 Retail sale of hardware, paints and glass in specialised stores	-	-	X	X	-	-	X	X
172	47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	-	-	X	X	-	-	X	X
173	47.61 Retail sale of books in specialised stores	-	-	X	X	-	-	X	X
174	47.72 Retail sale of footwear and leather goods in specialised stores	-	-	X	X	-	-	X	X
175	47.73 Dispensing chemist in specialised stores	-	-	X	X	-	-	X	X
176	47.78 Other retail sale of new goods in specialised stores	-	-	X	X	-	-	X	X
177	47.91 Retail sale via mail order houses or via Internet	-	-	X	X	-	-	X	X
178	49.10 Passenger rail transport, interurban	-	-	X	X	-	-	X	X
179	49.20 Freight rail transport	-	-	X	X	-	-	X	X
180	49.31 Urban and suburban passenger land transport	-	-	X	X	-	-	X	X
181	49.39 Other passenger land transport n.e.c.	-	-	X	X	0.1	-	X	X
182	49.41 Freight transport by road	-	-	X	X	-	-	X	X
183	51.10 Passenger air transport	-	-	X	X	-	-	X	X
184	51.21 Freight air transport	-	-	X	X	-	-	X	X
185	52.10 Warehousing and storage	-	-	X	X	-	-	X	X
186	52.21 Service activities incidental to land transportation	-	-	X	X	-	-	X	X
187	52.22 Service activities incidental to water transportation	-	-	X	X	-	-	X	X
188	52.23 Service activities incidental to air transportation	-	-	X	X	127.3	-	X	X
189	52.29 Other transportation support activities	-	-	X	X	-	-	X	X
190	53.20 Other postal and courier activities	-	-	X	X	0.4	-	X	X
191	55.10 Hotels and similar accommodation	-	-	X	X	-	-	X	X
192	55.20 Holiday and other short-stay accommodation	-	-	X	X	-	-	X	X
193	56.10 Restaurants and mobile food service activities	-	-	X	X	-	-	X	X

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		Water and marine resources (WTR)				Circular economy (CE)			
Based on the CapEx KPI Breakdown by sector - NACE 4 digits level (code and label) ¹		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 (WTR)	million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (CE)	million €	Of which environmentally sustainable (CE)
194	56.21 Event catering activities	-	-	X	X	-	-	X	X
195	56.29 Other food service activities	-	-	X	X	-	-	X	X
196	59.11 Motion picture, video and television programme production activities	-	-	X	X	2.2	-	X	X
197	60.20 Television programming and broadcasting activities	-	-	X	X	4.7	-	X	X
198	61.10 Wired telecommunications activities	0.0	-	X	X	-	-	X	X
199	61.20 Wireless telecommunications activities	0.0	-	X	X	0.0	-	X	X
200	61.90 Other telecommunications activities	-	-	X	X	10.4	-	X	X
201	62.01 Computer programming activities	-	-	X	X	0.0	-	X	X
202	62.02 Computer consultancy activities	-	-	X	X	30.8	-	X	X
203	62.09 Other information technology and computer service activities	-	-	X	X	-	-	X	X
204	63.11 Data processing, hosting and related activities	-	-	X	X	0.0	-	X	X
205	63.12 Web portals	-	-	X	X	-	-	X	X
206	64.99 Other financial service activities, except insurance and pension funding n.e.c.	-	-	X	X	-	-	X	X
207	66.19 Other activities auxiliary to financial services, except insurance and pension funding	-	-	X	X	-	-	X	X
208	68.10 Buying and selling of own real estate	-	-	X	X	34.7	-	X	X
209	68.20 Renting and operating of own or leased real estate	-	-	X	X	0.0	-	X	X
210	68.31 Real estate agencies	-	-	X	X	-	-	X	X
211	68.32 Management of real estate on a fee or contract basis	-	-	X	X	-	-	X	X
212	69.10 Legal activities	-	-	X	X	-	-	X	X
213	70.10 Activities of head offices	0.0	-	X	X	2.6	-	X	X
214	70.22 Business and other management consultancy activities	-	-	X	X	-	-	X	X
215	71.11 Architectural activities	-	-	X	X	-	-	X	X
216	71.12 Engineering activities and related technical consultancy	-	-	X	X	0.0	-	X	X
217	71.20 Technical testing and analysis	-	-	X	X	-	-	X	X
218	72.19 Other research and experimental development on natural sciences and engineering	-	-	X	X	-	-	X	X
219	73.11 Advertising agencies	-	-	X	X	0.0	-	X	X
220	73.12 Media representation	-	-	X	X	-	-	X	X
221	74.20 Photographic activities	-	-	X	X	-	-	X	X
222	74.90 Other professional, scientific and technical activities n.e.c.	0.0	-	X	X	0.0	-	X	X
223	75.00 Veterinary activities	-	-	X	X	0.0	-	X	X

		i	j	k	l	m	n	o	p
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	Water and marine resources (WTR)				Circular economy (CE)			
		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 (WTR)	million €	Of which environmentally sustainable (WTR)	million €	Of which environmentally sustainable (CE)	million €	Of which environmentally sustainable (CE)
224	77.11 Renting and leasing of cars and light motor vehicles	-	-	X	X	-	-	X	X
225	77.12 Renting and leasing of trucks	-	-	X	X	-	-	X	X
226	77.29 Renting and leasing of other personal and household goods	-	-	X	X	-	-	X	X
227	77.31 Renting and leasing of agricultural machinery and equipment	-	-	X	X	-	-	X	X
228	77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	-	-	X	X	-	-	X	X
229	79.12 Tour operator activities	-	-	X	X	0.0	-	X	X
230	80.10 Private security activities	-	-	X	X	-	-	X	X
231	81.22 Other building and industrial cleaning activities	-	-	X	X	-	-	X	X
232	81.30 Landscape service activities	-	-	X	X	-	-	X	X
233	82.99 Other business support service activities n.e.c.	0.0	-	X	X	0.0	-	X	X
234	85.10 Pre-primary education	-	-	X	X	-	-	X	X
235	85.59 Other education n.e.c.	-	-	X	X	0.4	-	X	X
236	86.10 Hospital activities	-	-	X	X	0.3	-	X	X
237	86.22 Specialist medical practice activities	-	-	X	X	-	-	X	X
238	86.90 Other human health activities	-	-	X	X	-	-	X	X
239	87.90 Other residential care activities	-	-	X	X	-	-	X	X
240	90.02 Support activities to performing arts	-	-	X	X	-	-	X	X
241	93.11 Operation of sports facilities	-	-	X	X	-	-	X	X
242	93.21 Activities of amusement parks and theme parks	-	-	X	X	-	-	X	X
243	93.29 Other amusement and recreation activities	-	-	X	X	0.0	-	X	X
244	94.99 Activities of other membership organisations n.e.c.	-	-	X	X	-	-	X	X
245	96.01 Washing and (dry-)cleaning of textile and fur products	-	-	X	X	-	-	X	X
246	96.09 Other personal service activities n.e.c.	-	-	X	X	0.0	-	X	X

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		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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) ¹		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)
1	01.30 Plant propagation	-	-	X	X	-	-	X	X
2	01.50 Mixed farming	-	-	X	X	-	-	X	X
3	01.61 Support activities for crop production	-	-	X	X	-	-	X	X
4	01.63 Post-harvest crop activities	-	-	X	X	-	-	X	X
5	02.40 Support services to forestry	-	-	X	X	-	-	X	X
6	06.10 Extraction of crude petroleum	-	-	X	X	-	-	X	X
7	07.29 Mining of other non-ferrous metal ores	-	-	X	X	-	-	X	X
8	08.12 Operation of gravel and sand pits; mining of clays and kaolin	-	-	X	X	0.0	-	X	X
9	10.13 Production of meat and poultry meat products	-	-	X	X	-	-	X	X
10	10.32 Manufacture of fruit and vegetable juice	-	-	X	X	-	-	X	X
11	10.39 Other processing and preserving of fruit and vegetables	-	-	X	X	-	-	X	X
12	10.51 Operation of dairies and cheese making	-	-	X	X	-	-	X	X
13	10.61 Manufacture of grain mill products	-	-	X	X	-	-	X	X
14	10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-	X	X	-	-	X	X
15	10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	-	-	X	X	-	-	X	X
16	10.82 Manufacture of cocoa, chocolate and sugar confectionery	-	-	X	X	-	-	X	X
17	10.86 Manufacture of homogenised food preparations and dietetic food	-	-	X	X	-	-	X	X
18	10.89 Manufacture of other food products n.e.c.	-	-	X	X	-	-	X	X
19	11.01 Distilling, rectifying and blending of spirits	-	-	X	X	-	-	X	X
20	11.02 Manufacture of wine from grape	-	-	X	X	-	-	X	X
21	11.05 Manufacture of beer	-	-	X	X	-	-	X	X
22	13.99 Manufacture of other textiles n.e.c.	-	-	X	X	-	-	X	X
23	14.19 Manufacture of other wearing apparel and accessories	-	-	X	X	-	-	X	X
24	16.10 Sawmilling and planing of wood	-	-	X	X	-	-	X	X
25	16.21 Manufacture of veneer sheets and wood-based panels	-	-	X	X	-	-	X	X
26	16.23 Manufacture of other builders' carpentry and joinery	-	-	X	X	-	-	X	X
27	16.24 Manufacture of wooden containers	-	-	X	X	-	-	X	X

		q		r		s		t		u		v		w		x	
Based on the CapEx KPI		Pollution (PPC)				Biodiversity and Ecosystems (BIO)											
		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) ¹		million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)
28	16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
29	17.12 Manufacture of paper and paperboard	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
30	17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
31	17.22 Manufacture of household and sanitary goods and of toilet requisites	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
32	17.23 Manufacture of paper stationery	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
33	17.24 Manufacture of wallpaper	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
34	18.12 Other printing	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
35	18.13 Pre-press and pre-media services	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
36	19.20 Manufacture of refined petroleum products	0.0	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
37	20.13 Manufacture of other inorganic basic chemicals	0.0	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
38	20.14 Manufacture of other organic basic chemicals	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
39	20.15 Manufacture of fertilisers and nitrogen compounds	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
40	20.16 Manufacture of plastics in primary forms	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
41	20.17 Manufacture of synthetic rubber in primary forms	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
42	20.20 Manufacture of pesticides and other agrochemical products	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
43	20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
44	20.59 Manufacture of other chemical products n.e.c.	8.0	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
45	20.60 Manufacture of man-made fibres	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
46	21.10 Manufacture of basic pharmaceutical products	1.8	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
47	21.20 Manufacture of pharmaceutical preparations	2.5	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
48	22.21 Manufacture of plastic plates, sheets, tubes and profiles	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
49	22.22 Manufacture of plastic packing goods	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
50	22.23 Manufacture of builders' ware of plastic	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
51	22.29 Manufacture of other plastic products	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
52	23.11 Manufacture of flat glass	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
53	23.13 Manufacture of hollow glass	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X
54	23.14 Manufacture of glass fibres	-	-	X	X	-	-	X	X	-	-	X	X	-	-	X	X

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		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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		million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
55	23.19 Manufacture and processing of other glass, including technical glassware	-	-	X	X	-	-	X	X
56	23.20 Manufacture of refractory products	-	-	X	X	-	-	X	X
57	23.32 Manufacture of bricks, tiles and construction products, in baked clay	-	-	X	X	-	-	X	X
58	23.44 Manufacture of other technical ceramic products	-	-	X	X	-	-	X	X
59	23.51 Manufacture of cement	-	-	X	X	-	-	X	X
60	23.61 Manufacture of concrete products for construction purposes	-	-	X	X	-	-	X	X
61	23.91 Production of abrasive products	-	-	X	X	-	-	X	X
62	24.10 Manufacture of basic iron and steel and of ferro-alloys	-	-	X	X	-	-	X	X
63	24.34 Cold drawing of wire	-	-	X	X	-	-	X	X
64	24.41 Precious metals production	-	-	X	X	-	-	X	X
65	24.42 Aluminium production	-	-	X	X	-	-	X	X
66	24.44 Copper production	-	-	X	X	-	-	X	X
67	24.51 Casting of iron	-	-	X	X	-	-	X	X
68	24.52 Casting of steel	-	-	X	X	-	-	X	X
69	24.53 Casting of light metals	-	-	X	X	-	-	X	X
70	25.11 Manufacture of metal structures and parts of structures	-	-	X	X	-	-	X	X
71	25.12 Manufacture of doors and windows of metal	-	-	X	X	-	-	X	X
72	25.21 Manufacture of central heating radiators and boilers	-	-	X	X	-	-	X	X
73	25.40 Manufacture of weapons and ammunition	0.0	-	X	X	0.0	-	X	X
74	25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	-	-	X	X	-	-	X	X
75	25.61 Treatment and coating of metals	-	-	X	X	-	-	X	X
76	25.62 Machining	-	-	X	X	-	-	X	X
77	25.71 Manufacture of cutlery	-	-	X	X	-	-	X	X
78	25.73 Manufacture of tools	-	-	X	X	-	-	X	X
79	25.99 Manufacture of other fabricated metal products n.e.c.	0.1	-	X	X	-	-	X	X
80	26.11 Manufacture of electronic components	-	-	X	X	-	-	X	X
81	26.20 Manufacture of computers and peripheral equipment	-	-	X	X	-	-	X	X
82	26.30 Manufacture of communication equipment	-	-	X	X	-	-	X	X
83	26.51 Manufacture of instruments and appliances for measuring, testing and navigation	0.0	-	X	X	0.0	-	X	X
84	26.70 Manufacture of optical instruments and photographic equipment	-	-	X	X	-	-	X	X

	q	r	s	t	u	v	w	x
	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)
Breakdown by sector - NACE 4 digits level (code and label) ¹								
85 27.11 Manufacture of electric motors, generators and transformers	-	-	X	X	-	-	X	X
86 27.12 Manufacture of electricity distribution and control apparatus	0.0	-	X	X	0.0	-	X	X
87 27.20 Manufacture of batteries and accumulators	-	-	X	X	-	-	X	X
88 27.32 Manufacture of other electronic and electric wires and cables	0.0	-	X	X	0.0	-	X	X
89 27.40 Manufacture of electric lighting equipment	-	-	X	X	-	-	X	X
90 27.52 Manufacture of non-electric domestic appliances	-	-	X	X	-	-	X	X
91 27.90 Manufacture of other electrical equipment	-	-	X	X	-	-	X	X
92 28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	-	-	X	X	-	-	X	X
93 28.15 Manufacture of bearings, gears, gearing and driving elements	-	-	X	X	-	-	X	X
94 28.21 Manufacture of ovens, furnaces and furnace burners	-	-	X	X	-	-	X	X
95 28.22 Manufacture of lifting and handling equipment	-	-	X	X	-	-	X	X
96 28.29 Manufacture of other general-purpose machinery n.e.c.	-	-	X	X	-	-	X	X
97 28.30 Manufacture of agricultural and forestry machinery	-	-	X	X	-	-	X	X
98 28.41 Manufacture of metal forming machinery	-	-	X	X	-	-	X	X
99 28.49 Manufacture of other machine tools	-	-	X	X	-	-	X	X
100 28.91 Manufacture of machinery for metallurgy	-	-	X	X	-	-	X	X
101 28.92 Manufacture of machinery for mining, quarrying and construction	-	-	X	X	-	-	X	X
102 28.93 Manufacture of machinery for food, beverage and tobacco processing	-	-	X	X	-	-	X	X
103 28.94 Manufacture of machinery for textile, apparel and leather production	-	-	X	X	-	-	X	X
104 28.95 Manufacture of machinery for paper and paperboard production	-	-	X	X	-	-	X	X
105 28.99 Manufacture of other special-purpose machinery n.e.c.	0.0	-	X	X	0.0	-	X	X
106 29.10 Manufacture of motor vehicles	-	-	X	X	-	-	X	X
107 29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi- trailers	-	-	X	X	-	-	X	X

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	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)
Breakdown by sector - NACE 4 digits level (code and label) ¹								
108 29.31 Manufacture of electrical and electronic equipment for motor vehicles	-	-	X	X	-	-	X	X
109 29.32 Manufacture of other parts and accessories for motor vehicles	-	-	X	X	-	-	X	X
110 30.20 Manufacture of railway locomotives and rolling stock	-	-	X	X	-	-	X	X
111 30.30 Manufacture of air and spacecraft and related machinery	0.0	-	X	X	0.0	-	X	X
112 30.99 Manufacture of other transport equipment n.e.c.	-	-	X	X	-	-	X	X
113 31.09 Manufacture of other furniture	-	-	X	X	-	-	X	X
114 32.40 Manufacture of games and toys	-	-	X	X	-	-	X	X
115 32.50 Manufacture of medical and dental instruments and supplies	-	-	X	X	-	-	X	X
116 32.99 Other manufacturing n.e.c.	-	-	X	X	-	-	X	X
117 33.12 Repair of machinery	-	-	X	X	-	-	X	X
118 33.13 Repair of electronic and optical equipment	-	-	X	X	-	-	X	X
119 35.11 Production of electricity	0.7	-	X	X	-	-	X	X
120 35.12 Transmission of electricity	0.0	-	X	X	-	-	X	X
121 35.13 Distribution of electricity	0.3	-	X	X	-	-	X	X
122 35.23 Trade of gas through mains	-	-	X	X	-	-	X	X
123 35.30 Steam and air conditioning supply	-	-	X	X	-	-	X	X
124 36.00 Water collection, treatment and supply	2.9	-	X	X	-	-	X	X
125 37.00 Sewerage	-	-	X	X	-	-	X	X
126 38.11 Collection of non- hazardous waste	0.0	-	X	X	-	-	X	X
127 38.22 Treatment and disposal of hazardous waste	-	-	X	X	-	-	X	X
128 38.32 Recovery of sorted materials	0.0	-	X	X	-	-	X	X
129 39.00 Remediation activities and other waste management services	0.0	-	X	X	-	-	X	X
130 41.10 Development of building projects	-	-	X	X	-	-	X	X
131 41.20 Construction of residential and non-residential buildings	-	-	X	X	0.0	-	X	X
132 42.11 Construction of roads and motorways	0.0	-	X	X	0.2	-	X	X
133 42.12 Construction of railways and underground railways	-	-	X	X	-	-	X	X
134 42.21 Construction of utility projects for fluids	-	-	X	X	-	-	X	X
135 42.91 Construction of water projects	-	-	X	X	-	-	X	X
136 42.99 Construction of other civil engineering projects n.e.c.	0.0	-	X	X	0.0	-	X	X
137 43.12 Site preparation	-	-	X	X	-	-	X	X

		q	r	s	t	u	v	w	x
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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) ¹		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)
138	43.21 Electrical installation	0.0	-	X	X	0.0	-	X	X
139	43.22 Plumbing, heat and air- conditioning installation	-	-	X	X	0.0	-	X	X
140	43.29 Other construction installation	-	-	X	X	0.0	-	X	X
141	43.91 Roofing activities	-	-	X	X	-	-	X	X
142	43.99 Other specialised construction activities n.e.c.	-	-	X	X	-	-	X	X
143	45.11 Sale of cars and light motor vehicles	-	-	X	X	-	-	X	X
144	45.19 Sale of other motor vehicles	-	-	X	X	-	-	X	X
145	45.20 Maintenance and repair of motor vehicles	-	-	X	X	-	-	X	X
146	45.31 Wholesale trade of motor vehicle parts and accessories	-	-	X	X	-	-	X	X
147	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	-	-	X	X	-	-	X	X
148	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	X	X	-	-	X	X
149	46.32 Wholesale of meat and meat products	-	-	X	X	-	-	X	X
150	46.39 Non-specialised wholesale of food, beverages and tobacco	-	-	X	X	-	-	X	X
151	46.42 Wholesale of clothing and footwear	-	-	X	X	-	-	X	X
152	46.43 Wholesale of electrical household appliances	-	-	X	X	0.0	-	X	X
153	46.45 Wholesale of perfume and cosmetics	1.2	-	X	X	-	-	X	X
154	46.49 Wholesale of other household goods	-	-	X	X	-	-	X	X
155	46.69 Wholesale of other machinery and equipment	0.0	-	X	X	0.0	-	X	X
156	46.71 Wholesale of solid, liquid and gaseous fuels and related products	-	-	X	X	-	-	X	X
157	46.72 Wholesale of metals and metal ores	-	-	X	X	-	-	X	X
158	46.73 Wholesale of wood, construction materials and sanitary equipment	-	-	X	X	-	-	X	X
159	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	-	-	X	X	-	-	X	X
160	46.75 Wholesale of chemical products	0.0	-	X	X	-	-	X	X
161	46.76 Wholesale of other intermediate products	-	-	X	X	-	-	X	X
162	46.90 Non-specialised wholesale trade	-	-	X	X	-	-	X	X
163	47.11 Retail sale in non- specialised stores with food, beverages or tobacco predominating	-	-	X	X	-	-	X	X

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		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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 (PPC)	million €	Of which environmentally sustainable (PPC)	million €	Of which environmentally sustainable (BIO)	million €	Of which environmentally sustainable (BIO)
164	47.19 Other retail sale in non-specialised stores	-	-	X	X	-	-	X	X
165	47.21 Retail sale of fruit and vegetables in specialised stores	-	-	X	X	-	-	X	X
166	47.22 Retail sale of meat and meat products in specialised stores	-	-	X	X	-	-	X	X
167	47.29 Other retail sale of food in specialised stores	-	-	X	X	-	-	X	X
168	47.30 Retail sale of automotive fuel in specialised stores	-	-	X	X	-	-	X	X
169	47.43 Retail sale of audio and video equipment in specialised stores	-	-	X	X	-	-	X	X
170	47.51 Retail sale of textiles in specialised stores	-	-	X	X	-	-	X	X
171	47.52 Retail sale of hardware, paints and glass in specialised stores	-	-	X	X	-	-	X	X
172	47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	-	-	X	X	-	-	X	X
173	47.61 Retail sale of books in specialised stores	0.0	-	X	X	-	-	X	X
174	47.72 Retail sale of footwear and leather goods in specialised stores	-	-	X	X	-	-	X	X
175	47.73 Dispensing chemist in specialised stores	-	-	X	X	-	-	X	X
176	47.78 Other retail sale of new goods in specialised stores	-	-	X	X	-	-	X	X
177	47.91 Retail sale via mail order houses or via Internet	-	-	X	X	-	-	X	X
178	49.10 Passenger rail transport, interurban	-	-	X	X	-	-	X	X
179	49.20 Freight rail transport	-	-	X	X	-	-	X	X
180	49.31 Urban and suburban passenger land transport	-	-	X	X	-	-	X	X
181	49.39 Other passenger land transport n.e.c.	-	-	X	X	-	-	X	X
182	49.41 Freight transport by road	-	-	X	X	-	-	X	X
183	51.10 Passenger air transport	-	-	X	X	-	-	X	X
184	51.21 Freight air transport	-	-	X	X	-	-	X	X
185	52.10 Warehousing and storage	-	-	X	X	-	-	X	X
186	52.21 Service activities incidental to land transportation	-	-	X	X	-	-	X	X
187	52.22 Service activities incidental to water transportation	-	-	X	X	-	-	X	X
188	52.23 Service activities incidental to air transportation	-	-	X	X	-	-	X	X
189	52.29 Other transportation support activities	-	-	X	X	-	-	X	X
190	53.20 Other postal and courier activities	-	-	X	X	-	-	X	X
191	55.10 Hotels and similar accommodation	-	-	X	X	9.1	-	X	X

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Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		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 (PPC)	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)
192	55.20 Holiday and other short-stay accommodation	-	-	X	X	-	-	X	X
193	56.10 Restaurants and mobile food service activities	0.0	-	X	X	-	-	X	X
194	56.21 Event catering activities	-	-	X	X	-	-	X	X
195	56.29 Other food service activities	-	-	X	X	-	-	X	X
196	59.11 Motion picture, video and television programme production activities	-	-	X	X	-	-	X	X
197	60.20 Television programming and broadcasting activities	-	-	X	X	0.0	-	X	X
198	61.10 Wired telecommunications activities	-	-	X	X	-	-	X	X
199	61.20 Wireless telecommunications activities	-	-	X	X	-	-	X	X
200	61.90 Other telecommunications activities	-	-	X	X	-	-	X	X
201	62.01 Computer programming activities	0.0	-	X	X	-	-	X	X
202	62.02 Computer consultancy activities	0.1	-	X	X	-	-	X	X
203	62.09 Other information technology and computer service activities	3.1	-	X	X	-	-	X	X
204	63.11 Data processing, hosting and related activities	-	-	X	X	-	-	X	X
205	63.12 Web portals	-	-	X	X	-	-	X	X
206	64.99 Other financial service activities, except insurance and pension funding n.e.c.	4.3	-	X	X	-	-	X	X
207	66.19 Other activities auxiliary to financial services, except insurance and pension funding	-	-	X	X	-	-	X	X
208	68.10 Buying and selling of own real estate	-	-	X	X	-	-	X	X
209	68.20 Renting and operating of own or leased real estate	-	-	X	X	-	-	X	X
210	68.31 Real estate agencies	-	-	X	X	-	-	X	X
211	68.32 Management of real estate on a fee or contract basis	-	-	X	X	-	-	X	X
212	69.10 Legal activities	-	-	X	X	-	-	X	X
213	70.10 Activities of head offices	0.0	-	X	X	0.0	-	X	X
214	70.22 Business and other management consultancy activities	-	-	X	X	-	-	X	X
215	71.11 Architectural activities	-	-	X	X	-	-	X	X
216	71.12 Engineering activities and related technical consultancy	-	-	X	X	-	-	X	X
217	71.20 Technical testing and analysis	-	-	X	X	-	-	X	X
218	72.19 Other research and experimental development on natural sciences and engineering	-	-	X	X	-	-	X	X
219	73.11 Advertising agencies	-	-	X	X	-	-	X	X
220	73.12 Media representation	0.0	-	X	X	-	-	X	X
221	74.20 Photographic activities	-	-	X	X	-	-	X	X

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	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
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	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (PPC)	million €	Of which environ- mentally sustainable (BIO)	million €	Of which environ- mentally sustainable (BIO)
Breakdown by sector - NACE 4 digits level (code and label) ¹								
222 74.90 Other professional, scientific and technical activities n.e.c.	0.0	-	X	X	-	-	X	X
223 75.00 Veterinary activities	0.0	-	X	X	-	-	X	X
224 77.11 Renting and leasing of cars and light motor vehicles	-	-	X	X	-	-	X	X
225 77.12 Renting and leasing of trucks	-	-	X	X	-	-	X	X
226 77.29 Renting and leasing of other personal and household goods	-	-	X	X	-	-	X	X
227 77.31 Renting and leasing of agricultural machinery and equipment	-	-	X	X	-	-	X	X
228 77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	-	-	X	X	-	-	X	X
229 79.12 Tour operator activities	-	-	X	X	-	-	X	X
230 80.10 Private security activities	-	-	X	X	-	-	X	X
231 81.22 Other building and industrial cleaning activities	-	-	X	X	-	-	X	X
232 81.30 Landscape service activities	-	-	X	X	-	-	X	X
233 82.99 Other business support service activities n.e.c.	0.0	-	X	X	-	-	X	X
234 85.10 Pre-primary education	-	-	X	X	-	-	X	X
235 85.59 Other education n.e.c.	-	-	X	X	-	-	X	X
236 86.10 Hospital activities	0.2	-	X	X	-	-	X	X
237 86.22 Specialist medical practice activities	-	-	X	X	-	-	X	X
238 86.90 Other human health activities	-	-	X	X	-	-	X	X
239 87.90 Other residential care activities	-	-	X	X	-	-	X	X
240 90.02 Support activities to performing arts	-	-	X	X	-	-	X	X
241 93.11 Operation of sports facilities	-	-	X	X	-	-	X	X
242 93.21 Activities of amusement parks and theme parks	-	-	X	X	-	-	X	X
243 93.29 Other amusement and recreation activities	-	-	X	X	-	-	X	X
244 94.99 Activities of other membership organisations n.e.c.	-	-	X	X	-	-	X	X
245 96.01 Washing and (dry-)cleaning of textile and fur products	-	-	X	X	-	-	X	X
246 96.09 Other personal service activities n.e.c.	-	-	X	X	-	-	X	X

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	Total (CCM + CCA + WTR + CE + PPC + BIO)			
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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
1 01.30 Plant propagation	0.4	-	X	X
2 01.50 Mixed farming	20.0	-	X	X
3 01.61 Support activities for crop production	0.5	-	X	X
4 01.63 Post-harvest crop activities	3.3	-	X	X
5 02.40 Support services to forestry	0.1	-	X	X
6 06.10 Extraction of crude petroleum	12.2	7.4	X	X
7 07.29 Mining of other non-ferrous metal ores	3.9	0.1	X	X
8 08.12 Operation of gravel and sand pits; mining of clays and kaolin	0.8	0.2	X	X
9 10.13 Production of meat and poultry meat products	1.0	-	X	X
10 10.32 Manufacture of fruit and vegetable juice	0.2	-	X	X
11 10.39 Other processing and preserving of fruit and vegetables	5.4	0.0	X	X
12 10.51 Operation of dairies and cheese making	20.0	0.0	X	X
13 10.61 Manufacture of grain mill products	18.7	-	X	X
14 10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes	1.8	-	X	X
15 10.73 Manufacture of macaroni, noodles, couscous and similar farinaceous products	0.5	0.2	X	X
16 10.82 Manufacture of cocoa, chocolate and sugar confectionery	0.2	-	X	X
17 10.86 Manufacture of homogenised food preparations and dietetic food	0.6	-	X	X
18 10.89 Manufacture of other food products n.e.c.	0.1	-	X	X
19 11.01 Distilling, rectifying and blending of spirits	0.9	-	X	X
20 11.02 Manufacture of wine from grape	0.3	-	X	X
21 11.05 Manufacture of beer	9.7	-	X	X
22 13.99 Manufacture of other textiles n.e.c.	0.2	-	X	X
23 14.19 Manufacture of other wearing apparel and accessories	47.1	-	X	X
24 16.10 Sawmilling and planing of wood	29.5	4.8	X	X
25 16.21 Manufacture of veneer sheets and wood-based panels	31.4	0.0	X	X
26 16.23 Manufacture of other builders' carpentry and joinery	0.9	0.0	X	X
27 16.24 Manufacture of wooden containers	10.6	-	X	X

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	Total (CCM + CCA + WTR + CE + PPC + BIO)			
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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
28 16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.3	0.1	X	X
29 17.12 Manufacture of paper and paperboard	0.6	0.3	X	X
30 17.21 Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	7.5	1.3	X	X
31 17.22 Manufacture of household and sanitary goods and of toilet requisites	0.2	-	X	X
32 17.23 Manufacture of paper stationery	1.4	-	X	X
33 17.24 Manufacture of wallpaper	12.7	0.1	X	X
34 18.12 Other printing	18.0	-	X	X
35 18.13 Pre-press and pre-media services	0.6	-	X	X
36 19.20 Manufacture of refined petroleum products	28.8	0.4	X	X
37 20.13 Manufacture of other inorganic basic chemicals	0.9	0.0	X	X
38 20.14 Manufacture of other organic basic chemicals	1.7	-	X	X
39 20.15 Manufacture of fertilisers and nitrogen compounds	0.2	0.0	X	X
40 20.16 Manufacture of plastics in primary forms	7.2	0.0	X	X
41 20.17 Manufacture of synthetic rubber in primary forms	13.0	-	X	X
42 20.20 Manufacture of pesticides and other agrochemical products	0.9	-	X	X
43 20.30 Manufacture of paints, varnishes and similar coatings, printing ink and mastics	1.7	0.0	X	X
44 20.59 Manufacture of other chemical products n.e.c.	60.1	1.4	X	X
45 20.60 Manufacture of man-made fibres	64.8	0.0	X	X
46 21.10 Manufacture of basic pharmaceutical products	105.6	13.7	X	X
47 21.20 Manufacture of pharmaceutical preparations	31.2	0.0	X	X
48 22.21 Manufacture of plastic plates, sheets, tubes and profiles	0.8	0.4	X	X
49 22.22 Manufacture of plastic packing goods	25.2	1.7	X	X
50 22.23 Manufacture of builders' ware of plastic	5.4	-	X	X
51 22.29 Manufacture of other plastic products	5.5	0.0	X	X
52 23.11 Manufacture of flat glass	1.4	1.3	X	X

	y	z	aa	ab
	Total (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the CapEx KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
53 23.13 Manufacture of hollow glass	5.6	2.5	X	X
54 23.14 Manufacture of glass fibres	2.1	-	X	X
55 23.19 Manufacture and processing of other glass, including technical glassware	0.1	-	X	X
56 23.20 Manufacture of refractory products	0.1	-	X	X
57 23.32 Manufacture of bricks, tiles and construction products, in baked clay	11.1	7.7	X	X
58 23.44 Manufacture of other technical ceramic products	0.3	-	X	X
59 23.51 Manufacture of cement	49.4	7.9	X	X
60 23.61 Manufacture of concrete products for construction purposes	0.1	0.0	X	X
61 23.91 Production of abrasive products	0.1	0.1	X	X
62 24.10 Manufacture of basic iron and steel and of ferro-alloys	95.2	14.0	X	X
63 24.34 Cold drawing of wire	2.1	-	X	X
64 24.41 Precious metals production	80.0	80.0	X	X
65 24.42 Aluminium production	0.7	-	X	X
66 24.44 Copper production	1.8	1.3	X	X
67 24.51 Casting of iron	0.3	-	X	X
68 24.52 Casting of steel	0.1	0.1	X	X
69 24.53 Casting of light metals	0.1	0.0	X	X
70 25.11 Manufacture of metal structures and parts of structures	45.1	3.9	X	X
71 25.12 Manufacture of doors and windows of metal	3.3	0.1	X	X
72 25.21 Manufacture of central heating radiators and boilers	31.2	-	X	X
73 25.40 Manufacture of weapons and ammunition	2.2	0.0	X	X
74 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	2.0	0.1	X	X
75 25.61 Treatment and coating of metals	0.8	-	X	X
76 25.62 Machining	1.8	0.3	X	X
77 25.71 Manufacture of cutlery	0.1	-	X	X
78 25.73 Manufacture of tools	0.1	-	X	X
79 25.99 Manufacture of other fabricated metal products n.e.c.	16.4	1.4	X	X
80 26.11 Manufacture of electronic components	27.5	0.1	X	X
81 26.20 Manufacture of computers and peripheral equipment	21.8	0.3	X	X
82 26.30 Manufacture of communication equipment	1.7	0.0	X	X

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	Total (CCM + CCA + WTR + CE + PPC + BIO)			
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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
83 26.51 Manufacture of instruments and appliances for measuring, testing and navigation	124.7	0.5	X	X
84 26.70 Manufacture of optical instruments and photographic equipment	28.4	0.4	X	X
85 27.11 Manufacture of electric motors, generators and transformers	9.2	6.3	X	X
86 27.12 Manufacture of electricity distribution and control apparatus	72.5	53.1	X	X
87 27.20 Manufacture of batteries and accumulators	3.3	-	X	X
88 27.32 Manufacture of other electronic and electric wires and cables	0.2	0.1	X	X
89 27.40 Manufacture of electric lighting equipment	130.6	2.1	X	X
90 27.52 Manufacture of non-electric domestic appliances	0.2	0.0	X	X
91 27.90 Manufacture of other electrical equipment	49.6	16.7	X	X
92 28.11 Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	27.3	19.7	X	X
93 28.15 Manufacture of bearings, gears, gearing and driving elements	0.3	-	X	X
94 28.21 Manufacture of ovens, furnaces and furnace burners	0.4	0.0	X	X
95 28.22 Manufacture of lifting and handling equipment	1.0	0.1	X	X
96 28.29 Manufacture of other general-purpose machinery n.e.c.	1.6	0.0	X	X
97 28.30 Manufacture of agricultural and forestry machinery	19.1	0.0	X	X
98 28.41 Manufacture of metal forming machinery	5.6	0.0	X	X
99 28.49 Manufacture of other machine tools	2.8	0.1	X	X
100 28.91 Manufacture of machinery for metallurgy	11.8	1.1	X	X
101 28.92 Manufacture of machinery for mining, quarrying and construction	2.3	-	X	X
102 28.93 Manufacture of machinery for food, beverage and tobacco processing	19.0	5.5	X	X
103 28.94 Manufacture of machinery for textile, apparel and leather production	0.1	0.1	X	X
104 28.95 Manufacture of machinery for paper and paperboard production	32.6	0.5	X	X
105 28.99 Manufacture of other special-purpose machinery n.e.c.	6.8	1.9	X	X

	y	z	aa	ab
	Total (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the CapEx KPI Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
106 29.10 Manufacture of motor vehicles	441.4	111.9	X	X
107 29.20 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	85.0	23.0	X	X
108 29.31 Manufacture of electrical and electronic equipment for motor vehicles	20.4	0.0	X	X
109 29.32 Manufacture of other parts and accessories for motor vehicles	5.5	5.5	X	X
110 30.20 Manufacture of railway locomotives and rolling stock	63.3	19.6	X	X
111 30.30 Manufacture of air and spacecraft and related machinery	32.3	0.0	X	X
112 30.99 Manufacture of other transport equipment n.e.c.	4.1	-	X	X
113 31.09 Manufacture of other furniture	0.5	-	X	X
114 32.40 Manufacture of games and toys	0.1	-	X	X
115 32.50 Manufacture of medical and dental instruments and supplies	110.5	0.9	X	X
116 32.99 Other manufacturing n.e.c.	6.5	0.0	X	X
117 33.12 Repair of machinery	0.1	0.1	X	X
118 33.13 Repair of electronic and optical equipment	1.1	-	X	X
119 35.11 Production of electricity	7 064.3	3 970.9	X	X
120 35.12 Transmission of electricity	5.0	4.9	X	X
121 35.13 Distribution of electricity	5.0	1.6	X	X
122 35.23 Trade of gas through mains	4.4	4.4	X	X
123 35.30 Steam and air conditioning supply	11.1	10.8	X	X
124 36.00 Water collection, treatment and supply	32.5	14.8	X	X
125 37.00 Sewerage	0.1	0.1	X	X
126 38.11 Collection of non-hazardous waste	0.2	0.1	X	X
127 38.22 Treatment and disposal of hazardous waste	0.1	-	X	X
128 38.32 Recovery of sorted materials	6.0	0.0	X	X
129 39.00 Remediation activities and other waste management services	0.7	0.0	X	X
130 41.10 Development of building projects	60.2	0.0	X	X
131 41.20 Construction of residential and non-residential buildings	20.7	3.1	X	X
132 42.11 Construction of roads and motorways	18.2	5.9	X	X

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		Total (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
133	42.12 Construction of railways and underground railways	5.8	0.0	X	X
134	42.21 Construction of utility projects for fluids	2.7	-	X	X
135	42.91 Construction of water projects	8.1	-	X	X
136	42.99 Construction of other civil engineering projects n.e.c.	31.5	6.4	X	X
137	43.12 Site preparation	1.2	0.4	X	X
138	43.21 Electrical installation	20.4	13.3	X	X
139	43.22 Plumbing, heat and air-conditioning installation	0.6	0.0	X	X
140	43.29 Other construction installation	40.7	12.6	X	X
141	43.91 Roofing activities	0.1	-	X	X
142	43.99 Other specialised construction activities n.e.c.	16.0	0.7	X	X
143	45.11 Sale of cars and light motor vehicles	0.5	0.0	X	X
144	45.19 Sale of other motor vehicles	0.4	0.0	X	X
145	45.20 Maintenance and repair of motor vehicles	3.2	-	X	X
146	45.31 Wholesale trade of motor vehicle parts and accessories	0.1	-	X	X
147	46.12 Agents involved in the sale of fuels, ores, metals and industrial chemicals	4.4	-	X	X
148	46.21 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	103.1	96.0	X	X
149	46.32 Wholesale of meat and meat products	0.1	-	X	X
150	46.39 Non-specialised wholesale of food, beverages and tobacco	14.9	0.0	X	X
151	46.42 Wholesale of clothing and footwear	1.4	0.1	X	X
152	46.43 Wholesale of electrical household appliances	2.5	0.0	X	X
153	46.45 Wholesale of perfume and cosmetics	4.4	0.0	X	X
154	46.49 Wholesale of other household goods	2.3	-	X	X
155	46.69 Wholesale of other machinery and equipment	13.1	0.0	X	X
156	46.71 Wholesale of solid, liquid and gaseous fuels and related products	7.4	1.6	X	X
157	46.72 Wholesale of metals and metal ores	66.1	29.9	X	X
158	46.73 Wholesale of wood, construction materials and sanitary equipment	5.0	0.0	X	X
159	46.74 Wholesale of hardware, plumbing and heating equipment and supplies	0.9	-	X	X

	y	z	aa	ab
	Total (CCM + CCA + WTR + CE + PPC + BIO)			
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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
160 46.75 Wholesale of chemical products	22.6	0.3	X	X
161 46.76 Wholesale of other intermediate products	0.6	0.0	X	X
162 46.90 Non-specialised wholesale trade	28.5	8.3	X	X
163 47.11 Retail sale in non-specialised stores with food, beverages or tobacco predominating	12.8	0.0	X	X
164 47.19 Other retail sale in non-specialised stores	0.2	0.0	X	X
165 47.21 Retail sale of fruit and vegetables in specialised stores	24.7	2.3	X	X
166 47.22 Retail sale of meat and meat products in specialised stores	1.5	-	X	X
167 47.29 Other retail sale of food in specialised stores	9.3	-	X	X
168 47.30 Retail sale of automotive fuel in specialised stores	1.0	-	X	X
169 47.43 Retail sale of audio and video equipment in specialised stores	0.5	-	X	X
170 47.51 Retail sale of textiles in specialised stores	6.5	1.1	X	X
171 47.52 Retail sale of hardware, paints and glass in specialised stores	5.9	-	X	X
172 47.59 Retail sale of furniture, lighting equipment and other household articles in specialised stores	0.2	0.0	X	X
173 47.61 Retail sale of books in specialised stores	0.1	0.0	X	X
174 47.72 Retail sale of footwear and leather goods in specialised stores	0.9	0.0	X	X
175 47.73 Dispensing chemist in specialised stores	1.1	-	X	X
176 47.78 Other retail sale of new goods in specialised stores	31.1	-	X	X
177 47.91 Retail sale via mail order houses or via Internet	5.9	0.0	X	X
178 49.10 Passenger rail transport, interurban	293.3	136.6	X	X
179 49.20 Freight rail transport	43.4	0.0	X	X
180 49.31 Urban and suburban passenger land transport	13.6	0.0	X	X
181 49.39 Other passenger land transport n.e.c.	2.6	0.3	X	X
182 49.41 Freight transport by road	4.9	0.0	X	X
183 51.10 Passenger air transport	960.7	0.0	X	X
184 51.21 Freight air transport	26.0	-	X	X
185 52.10 Warehousing and storage	0.4	-	X	X

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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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
Breakdown by sector - NACE 4 digits level (code and label) ¹				
186 52.21 Service activities incidental to land transportation	16.0	9.2	X	X
187 52.22 Service activities incidental to water transportation	3.5	-	X	X
188 52.23 Service activities incidental to air transportation	417.1	46.5	X	X
189 52.29 Other transportation support activities	36.5	0.0	X	X
190 53.20 Other postal and courier activities	185.5	60.3	X	X
191 55.10 Hotels and similar accommodation	139.0	0.0	X	X
192 55.20 Holiday and other short-stay accommodation	1.0	-	X	X
193 56.10 Restaurants and mobile food service activities	0.6	0.0	X	X
194 56.21 Event catering activities	0.4	-	X	X
195 56.29 Other food service activities	0.7	-	X	X
196 59.11 Motion picture, video and television programme production activities	45.5	1.1	X	X
197 60.20 Television programming and broadcasting activities	12.4	0.3	X	X
198 61.10 Wired telecommunications activities	0.7	0.0	X	X
199 61.20 Wireless telecommunications activities	0.4	0.0	X	X
200 61.90 Other telecommunications activities	29.2	0.5	X	X
201 62.01 Computer programming activities	0.1	0.0	X	X
202 62.02 Computer consultancy activities	244.7	33.9	X	X
203 62.09 Other information technology and computer service activities	25.2	1.9	X	X
204 63.11 Data processing, hosting and related activities	11.3	8.7	X	X
205 63.12 Web portals	27.1	24.7	X	X
206 64.99 Other financial service activities, except insurance and pension funding n.e.c.	40.1	32.9	X	X
207 66.19 Other activities auxiliary to financial services, except insurance and pension funding	16.2	14.8	X	X
208 68.10 Buying and selling of own real estate	885.7	3.5	X	X
209 68.20 Renting and operating of own or leased real estate	6 108.4	1.5	X	X
210 68.31 Real estate agencies	108.8	0.0	X	X
211 68.32 Management of real estate on a fee or contract basis	1 397.2	0.0	X	X
212 69.10 Legal activities	0.9	-	X	X

	y	z	aa	ab	
	Total (CCM + CCA + WTR + CE + PPC + BIO)				
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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹	
213	70.10 Activities of head offices	508.3	94.2	X	X
214	70.22 Business and other management consultancy activities	20.5	3.7	X	X
215	71.11 Architectural activities	0.9	-	X	X
216	71.12 Engineering activities and related technical consultancy	11.5	10.7	X	X
217	71.20 Technical testing and analysis	23.2	0.0	X	X
218	72.19 Other research and experimental development on natural sciences and engineering	3.4	-	X	X
219	73.11 Advertising agencies	0.5	0.0	X	X
220	73.12 Media representation	32.2	14.8	X	X
221	74.20 Photographic activities	1.8	-	X	X
222	74.90 Other professional, scientific and technical activities n.e.c.	74.6	0.0	X	X
223	75.00 Veterinary activities	7.3	-	X	X
224	77.11 Renting and leasing of cars and light motor vehicles	12.3	3.9	X	X
225	77.12 Renting and leasing of trucks	4.3	-	X	X
226	77.29 Renting and leasing of other personal and household goods	0.1	-	X	X
227	77.31 Renting and leasing of agricultural machinery and equipment	63.3	-	X	X
228	77.39 Renting and leasing of other machinery, equipment and tangible goods n.e.c.	9.3	-	X	X
229	79.12 Tour operator activities	99.9	0.4	X	X
230	80.10 Private security activities	4.6	0.0	X	X
231	81.22 Other building and industrial cleaning activities	0.2	-	X	X
232	81.30 Landscape service activities	0.6	-	X	X
233	82.99 Other business support service activities n.e.c.	46.7	2.5	X	X
234	85.10 Pre-primary education	0.8	-	X	X
235	85.59 Other education n.e.c.	0.4	0.0	X	X
236	86.10 Hospital activities	1.5	-	X	X
237	86.22 Specialist medical practice activities	4.7	-	X	X
238	86.90 Other human health activities	0.5	-	X	X
239	87.90 Other residential care activities	1.4	-	X	X
240	90.02 Support activities to performing arts	0.1	-	X	X
241	93.11 Operation of sports facilities	4.2	-	X	X
242	93.21 Activities of amusement parks and theme parks	14.7	-	X	X

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		Total (CCM + CCA + WTR + CE + PPC + BIO)			
Based on the CapEx KPI	Breakdown by sector - NACE 4 digits level (code and label) ¹	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) ¹	million	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) ¹
243	93.29 Other amusement and recreation activities	7.7	-	X	X
244	94.99 Activities of other membership organisations n.e.c.	9.6	-	X	X
245	96.01 Washing and (dry-)cleaning of textile and fur products	0.3	-	X	X
246	96.09 Other personal service activities n.e.c.	121.9	0.0	X	X

¹ Only sectors / NACE codes with taxonomy-eligible exposures > €0.1 million (rounded) 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)			
	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) ²					% (compared to total covered assets in the denominator) ²			
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	35.7	3.3	2.9	0.1	0.1	0.1	0.0	-	0.0
2 Financial undertakings	3.5	0.3	0.0	0.0	0.0	0.1	0.0	-	0.0
3 Credit institutions	3.2	0.2	-	0.0	0.0	0.0	0.0	-	0.0
4 Loans and advances	1.9	0.1	-	0.0	0.0	0.0	0.0	-	0.0
5 Debt securities, including UoP ¹	1.2	0.1	-	0.0	0.0	0.0	0.0	-	0.0
6 Equity instruments	-	-	X	-	-	-	-	X	-
7 Other financial corporations	0.3	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
8 of which investment firms	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
9 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	-	X	-
12 of which management companies	0.0	0.0	-	0.0	0.0	-	-	-	-
13 Loans and advances	0.0	0.0	-	0.0	0.0	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	-	X	-
16 of which insurance undertakings	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
17 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	-	X	-
20 Non-financial undertakings	4.8	1.0	0.9	0.0	0.1	0.1	0.0	-	0.0
21 Loans and advances	4.7	0.9	0.9	0.0	0.1	0.0	0.0	-	0.0
22 Debt securities, including UoP ¹	0.1	0.1	-	0.0	0.0	0.0	0.0	-	0.0
23 Equity instruments	-	-	X	-	-	-	-	X	-
24 Households	27.4	2.0	2.0	-	-	-	-	-	-
of which loans collateralised by residential immovable property									
25	25.1	1.8	1.8	-	-	-	-	-	-
26 of which building renovation loans	0.9	-	-	-	-	-	-	-	-
of which motor vehicle loans									
27	0.1	-	-	-	-	X	X	X	X
28 Local governments financing	0.0	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-
30 Other local government financing	0.0	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties									
31	-	-	-	-	-	-	-	-	-
32 Total GAR assets	35.7	3.3	2.9	0.1	0.1	0.1	0.0	-	0.0

¹ UoP (Use of Proceeds) refers to exposures where the use of proceeds by the borrower/issuer is known.² 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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	j	k	l	m	n	o	p	q
Disclosure reference date T								
Based on the Turnover KPI	Water and marine resources (WTR)			Circular economy (CE)				
	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) ²		Of which Use of Proceeds	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
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0	-	-	-	0.0	-	-	-
2 Financial undertakings	0.0	-	-	-	0.0	-	-	-
3 Credit institutions	0.0	-	-	-	0.0	-	-	-
4 Loans and advances	0.0	-	-	-	0.0	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	0.0	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	0.0	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	0.0	-	-	-	0.0	-	-	-
21 Loans and advances	0.0	-	-	-	0.0	-	-	-
22 Debt securities, including UoP ¹	0.0	-	-	-	0.0	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
25 of which loans collateralised by residential immovable property	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32 Total GAR assets	0.0	-	-	-	0.0	-	-	-

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

² 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.

	r	s	t	u	v	w	x	z
Disclosure reference date T								
Based on the Turnover KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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)²	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 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
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.0	-	-	-	0.0	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	0.0	-	-	-	0.0	-	-	-
21 Loans and advances	0.0	-	-	-	0.0	-	-	-
22 Debt securities, including UoP ¹	0.0	-	-	-	0.0	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
25 of which loans collateralised by residential immovable property	X	X	X	X	X	X	X	X
26 of which building renovation loans	X	X	X	X	X	X	X	X
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32 Total GAR assets	0.0	-	-	-	0.0	-	-	-

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

² 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									
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)					
	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	
% (compared to total covered assets in the denominator) ²									
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	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 ¹	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 ¹	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	-	X	-
12 of which management companies	0	-	-	-	-	-	-	-	-
13 Loans and advances	0	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	-	X	-
16 of which insurance undertakings	0	-	-	-	-	-	-	-	-
17 Loans and advances	0	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
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 ¹	0.1	0	-	0	0	0	0	-	0
23 Equity instruments	-	-	X	-	-	-	-	-	-
24 Households	30.6	1.5	1.5	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	27.9	1.3	1.3	-	-	-	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-	-
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

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

² 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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	ap	aq	ar	as	at	au	av	aw
Disclosure reference date T-1								
Based on the CapEx KPI								
% (compared to total covered assets in the denominator) ²	Water and marine resources (WTR)			Circular economy (CE)				
	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 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
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	-	-	-	-	-	-	-	-
1 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
of which loans collateralised by residential immovable property	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
31	-	-	-	-	-	-	-	-
32 Total GAR assets	-	-	-	-	-	-	-	-

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

² 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.

	ax	ay	az	ba	bb	bc	bd	be
Disclosure reference date T-1								
Based on the Turnover KPI								
% (compared to total covered assets in the denominator)²	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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 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
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-	-
1	-	-	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP¹	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
of which loans collateralised by residential immovable property	X	X	X	X	X	X	X	X
of which building renovation loans	X	X	X	X	X	X	X	X
of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
31	-	-	-	-	-	-	-	-
32 Total GAR assets	-	-	-	-	-	-	-	-

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

² 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
Disclosure reference date T-1							Proportion of total assets covered
Based on the Turnover KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	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	transitional	enabling		
% (compared to total covered assets in the denominator) ²							
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		35.1	2.3	2.3	0	0	33.0
2	Financial undertakings	1.1	0	0	-	0	3.6
3	Credit institutions	0.8	-	-	-	-	3.2
4	Loans and advances	0.4	-	-	-	-	1.9
5	Debt securities, including UoP ¹	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 ¹	-	-	-	-	-	-
11	Equity instruments	-	-	X	-	-	-
12	of which management companies	0	-	-	-	-	0.1
13	Loans and advances	0	-	-	-	-	0.1
14	Debt securities, including UoP ¹	-	-	-	-	-	0
15	Equity instruments	-	-	X	-	-	-
16	of which insurance undertakings	0	-	-	-	-	0
17	Loans and advances	0	-	-	-	-	0
18	Debt securities, including UoP ¹	-	-	-	-	-	-
19	Equity instruments	-	-	X	-	-	-
20	Non-financial undertakings	3.5	0.9	0.8	0	0	3.6
21	Loans and advances	3.4	0.9	0.8	0	0	3.5
22	Debt securities, including UoP ¹	0.1	0	-	0	0	0.2
23	Equity instruments	-	-	X	-	-	-
24	Households	30.6	1.5	1.5	-	-	24.1
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	-	-	-	-	0.7
27	of which motor vehicle loans	0	-	-	-	-	0.1
28	Local governments financing	0	-	-	-	-	1.6
29	Housing financing	-	-	-	-	-	-
30	Other local government financing	0	-	-	-	-	1.6
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
32	Total GAR assets	35.1	2.3	2.3	0	0	69.2

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

² 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 CapEx 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) ²									
	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	35.7	3.6	2.9	0.1	0.2	0.2	0.0	-	0.0
2 Financial undertakings	3.2	0.3	0.0	0.0	0.1	0.1	0.0	-	0.0
3 Credit institutions	2.9	0.3	-	0.0	0.0	0.0	0.0	-	0.0
4 Loans and advances	1.8	0.2	-	0.0	0.0	0.0	0.0	-	0.0
5 Debt securities, including UoP ¹	1.0	0.1	-	0.0	0.0	0.0	0.0	-	0.0
6 Equity instruments	-	-	X	-	-	-	-	X	-
7 Other financial corporations	0.3	0.1	0.0	0.0	0.0	0.0	0.0	-	0.0
8 of which investment firms	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
9 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	-	X	-
12 of which management companies	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
13 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	-	X	-
16 of which insurance undertakings	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
17 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	-	X	-
20 Non-financial undertakings	5.0	1.2	0.9	0.0	0.2	0.1	0.0	-	0.0
21 Loans and advances	4.9	1.1	0.9	0.0	0.1	0.1	0.0	-	0.0
22 Debt securities, including UoP ¹	0.1	0.1	-	0.0	0.1	0.1	0.0	-	0.0
23 Equity instruments	-	-	X	-	-	-	-	X	-
24 Households	27.4	2.0	2.0	-	-	-	-	-	-
of which loans collateralised by residential immovable property	25.1	1.8	1.8	-	-	-	-	-	-
26 of which building renovation loans	0.9	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	0.1	-	-	-	-	X	X	X	X
28 Local governments financing	0.0	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-
30 Other local government financing	0.0	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-
32 Total GAR assets	35.7	3.6	2.9	0.1	0.2	0.2	0.0	-	0.0

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

² 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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	j	k	l	m	n	o	p	q
Disclosure reference date T								
Based on the CapEx KPI	Water and marine resources (WTR)				Circular economy (CE)			
	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) ²				% (compared to total covered assets in the denominator) ²			
			Of which Use of Proceeds	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
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.0	-	-	-	0.1	-	-	-
2 Financial undertakings	0.0	-	-	-	0.0	-	-	-
3 Credit institutions	0.0	-	-	-	0.0	-	-	-
4 Loans and advances	0.0	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	0.0	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	0.0	-	-	-
8 of which investment firms	-	-	-	-	0.0	-	-	-
9 Loans and advances	-	-	-	-	0.0	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	0.0	-	-	-	0.1	-	-	-
21 Loans and advances	0.0	-	-	-	0.1	-	-	-
22 Debt securities, including UoP ¹	0.0	-	-	-	0.0	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
25 of which loans collateralised by residential immovable property	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32 Total GAR assets	0.0	-	-	-	0.1	-	-	-

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

² 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.

		r	s	t	u	v	w	x	z
Disclosure reference date T									
Based on the CapEx KPI		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		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)	
		% (compared to total covered assets in the denominator) ²			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds
GAR - Covered assets in both numerator and denominator		X	X	X	X	X	X	X	X
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0	-	-	-	0.0	-	-	-
2	Financial undertakings	0.0	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-
5	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	X	-	-	-	X	-
7	Other financial corporations	0.0	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-
10	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	X	-	-	-	X	-
12	of which management companies	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-
14	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	X	-	-	-	X	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-
18	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	X	-	-	-	X	-
20	Non-financial undertakings	0.0	-	-	-	0.0	-	-	-
21	Loans and advances	0.0	-	-	-	0.0	-	-	-
22	Debt securities, including UoP ¹	0.0	-	-	-	0.0	-	-	-
23	Equity instruments	-	-	X	-	-	-	X	-
24	Households	X	X	X	X	X	X	X	X
25	of which loans collateralised by residential immovable property	X	X	X	X	X	X	X	X
26	of which building renovation loans	X	X	X	X	X	X	X	X
27	of which motor vehicle loans	X	X	X	X	X	X	X	X
28	Local governments financing	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32	Total GAR assets	0.0	-	-	-	0.0	-	-	-

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

² 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			
Disclosure reference date T									
Based on the CapEx KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	Proportion of total assets covered							
						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	% (compared to total covered assets in the denominator) ²	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			
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	36.0	3.6	2.9	0.1	0.3	41.3		
2	Financial undertakings	3.3	0.3	0.0	0.0	0.1	9.2		
3	Credit institutions	2.9	0.3	-	0.0	0.0	8.0		
4	Loans and advances	1.9	0.2	-	0.0	0.0	5.2		
5	Debt securities, including UoP ¹	1.1	0.1	-	0.0	0.0	2.8		
6	Equity instruments	-	-	X	-	-	-		
7	Other financial corporations	0.4	0.1	0.0	0.0	0.0	1.2		
8	of which investment firms	0.0	0.0	-	0.0	0.0	0.0		
9	Loans and advances	0.0	0.0	-	0.0	0.0	0.0		
10	Debt securities, including UoP ¹	-	-	-	-	-	-		
11	Equity instruments	-	-	X	-	-	-		
12	of which management companies	0.0	0.0	-	0.0	0.0	0.5		
13	Loans and advances	0.0	0.0	-	0.0	0.0	0.0		
14	Debt securities, including UoP ¹	-	-	-	-	-	0.5		
15	Equity instruments	-	-	X	-	-	-		
16	of which insurance undertakings	0.0	0.0	-	0.0	0.0	0.0		
17	Loans and advances	0.0	0.0	-	0.0	0.0	0.0		
18	Debt securities, including UoP ¹	-	-	-	-	-	-		
19	Equity instruments	-	-	X	-	-	-		
20	Non-financial undertakings	5.3	1.2	0.9	0.0	0.2	6.2		
21	Loans and advances	5.1	1.1	0.9	0.0	0.1	5.9		
22	Debt securities, including UoP ¹	0.2	0.1	-	0.0	0.1	0.3		
23	Equity instruments	-	-	X	-	-	-		
24	Households	27.4	2.0	2.0	-	-	22.9		
25	of which loans collateralised by residential immovable property	25.1	1.8	1.8	-	-	19.0		
26	of which building renovation loans	0.9	-	-	-	-	0.6		
27	of which motor vehicle loans	0.1	-	-	-	-	0.1		
28	Local governments financing	0.0	-	-	-	-	3.0		
29	Housing financing	-	-	-	-	-	-		
30	Other local government financing	0.0	-	-	-	-	3.0		
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-		
32	Total GAR assets	36.0	3.6	2.9	0.1	0.3	73.5		

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

² 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									
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)			
		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		
% (compared to total covered assets in the denominator) ²									
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	35.3	2.4	2.3	0	0.1	0	0	-	0
2 Financial undertakings	1.1	0	0	0	0	0	-	-	-
3 Credit institutions	0.8	-	-	-	-	-	-	-	-
4 Loans and advances	0.4	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	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 ¹	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	-	X	-
12 of which management companies	0	-	-	-	-	-	-	-	-
13 Loans and advances	0	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	-	X	-
16 of which insurance undertakings	0	-	-	-	-	-	-	-	-
17 Loans and advances	0	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	-	X	-
20 Non-financial undertakings	3.6	0.9	0.8	0	0.1	0	0	-	0
21 Loans and advances	3.5	0.9	0.8	0	0.1	0	0	-	0
22 Debt securities, including UoP ¹	0.1	0	-	0	0	0	0	-	0
23 Equity instruments	-	-	X	-	-	-	-	X	-
24 Households	30.6	1.5	1.5	-	-	-	-	-	-
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
28 Local governments financing	0	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-
30 Other local government financing	0	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-
32 Total GAR assets	35.3	2.4	2.3	0	0.1	0	0	-	0

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

² 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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	ap	aq	ar	as	at	au	av	aw
Disclosure reference date T-1								
Based on the CapEx KPI								
% (compared to total covered assets in the denominator) ²	Water and marine resources (WTR)			Circular economy (CE)				
	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 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
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	-	-	-	-	-	-	-	-
1	-	-	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	-	-	-	-
of which loans collateralised by residential immovable property	X	X	X	X	-	-	-	-
26 of which building renovation loans	X	X	X	X	-	-	-	-
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
31	-	-	-	-	-	-	-	-
32 Total GAR assets	-	-	-	-	-	-	-	-

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

² 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.

	ax	ay	az	ba	bb	bc	bd	be
Disclosure reference date T-1 Based on the CapEx KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
% (compared to total covered assets in the denominator) ²	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-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
			Of which Use of Proceeds	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
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-	-
1	-	-	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
of which loans collateralised by residential immovable property	X	X	X	X	X	X	X	X
26 of which building renovation loans	X	X	X	X	X	X	X	X
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
31	-	-	-	-	-	-	-	-
32 Total GAR assets	-	-	-	-	-	-	-	-

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

² 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
Disclosure reference date T-1						Proportion of total assets covered
Based on the CapEx KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		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	
% (compared to total covered assets in the denominator) ²						
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	35.3	2.4	2.3	0	0.1	33
2 Financial undertakings	1.1	0	0	0	0	3.6
3 Credit institutions	0.8	-	-	-	-	3.2
4 Loans and advances	0.4	-	-	-	-	1.9
5 Debt securities, including UoP ¹	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 ¹	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-
12 of which management companies	0	-	-	-	-	0.1
13 Loans and advances	0	-	-	-	-	0.1
14 Debt securities, including UoP ¹	-	-	-	-	-	0
15 Equity instruments	-	-	X	-	-	-
16 of which insurance undertakings	0	-	-	-	-	0
17 Loans and advances	0	-	-	-	-	0
18 Debt securities, including UoP ¹	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-
20 Non-financial undertakings	3.6	1	0.8	0	0.1	3.6
21 Loans and advances	3.6	0.9	0.8	0	0.1	3.5
22 Debt securities, including UoP ¹	0.1	0	-	0	0	0.2
23 Equity instruments	-	-	X	-	-	-
24 Households	30.6	1.5	1.5	-	-	24.1
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
28 Local governments financing	0	-	-	-	-	1.6
29 Housing financing	-	-	-	-	-	-
30 Other local government financing	0	-	-	-	-	1.6
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
32 Total GAR assets	35.3	2.4	2.3	0	0.1	69.2

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

² 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									
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)			
	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) ²			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
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	6.2	0.9	0.8	0.0	0.0	0.0	0.0	-	0.0
2 Financial undertakings	0.5	0.0	-	0.0	0.0	0.0	0.0	-	0.0
3 Credit institutions	0.4	0.0	-	0.0	0.0	0.0	0.0	-	0.0
4 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
5 Debt securities, including UoP ¹	0.3	0.0	-	0.0	0.0	0.0	0.0	-	0.0
6 Equity instruments	-	-	X	-	-	-	-	X	-
7 Other financial corporations	0.1	0.0	-	0.0	0.0	0.0	0.0	-	0.0
8 of which investment firms	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	-	X	-
12 of which management companies	0.0	0.0	-	0.0	0.0	-	-	-	-
13 Loans and advances	0.0	0.0	-	0.0	0.0	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	-	X	-
16 of which insurance undertakings	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
17 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	-	X	-
20 Non-financial undertakings	1.8	0.3	0.3	0.0	0.0	0.0	0.0	-	0.0
21 Loans and advances	1.8	0.3	0.3	0.0	0.0	0.0	0.0	-	0.0
22 Debt securities, including UoP ¹	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
23 Equity instruments	-	-	X	-	-	-	-	X	-
24 Households	3.9	0.5	0.5	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	3.2	0.4	0.4	-	-	-	-	-	-
26 of which building renovation loans	0.1	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	0.0	-	-	-	-	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-
32 Total GAR assets	6.2	0.9	0.8	0.0	0.0	0.0	0.0	-	0.0

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

² 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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		j	k	l	m	n	o	p	q
Disclosure reference date T									
Based on the Turnover KPI	% (compared to total covered assets in the denominator) ²	Water and marine resources (WTR)				Circular economy (CE)			
		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 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
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0	-	-	-	0.0	-	-	-
2	Financial undertakings	-	-	-	-	0.0	-	-	-
3	Credit institutions	-	-	-	-	0.0	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-
5	Debt securities, including UoP ¹	-	-	-	-	0.0	-	-	-
6	Equity instruments	-	-	X	-	-	-	X	-
7	Other financial corporations	-	-	-	-	0.0	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-
10	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	X	-	-	-	X	-
12	of which management companies	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-
14	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	X	-	-	-	X	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-
18	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	X	-	-	-	X	-
20	Non-financial undertakings	0.0	-	-	-	0.0	-	-	-
21	Loans and advances	0.0	-	-	-	0.0	-	-	-
22	Debt securities, including UoP ¹	0.0	-	-	-	0.0	-	-	-
23	Equity instruments	-	-	X	-	-	-	X	-
24	Households	X	X	X	X	-	-	-	-
25	of which loans collateralised by residential immovable property	X	X	X	X	-	-	-	-
26	of which building renovation loans	X	X	X	X	-	-	-	-
27	of which motor vehicle loans	X	X	X	X	X	X	X	X
28	Local governments financing	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32	Total GAR assets	0.0	-	-	-	0.0	-	-	-

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

² 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.

	r	s	t	u	v	w	x	z
Disclosure reference date T								
Based on the Turnover KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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) ²				% (compared to total covered assets in the denominator) ²			
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.0	-	-	-	0.0	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	0.0	-	-	-	0.0	-	-	-
21 Loans and advances	0.0	-	-	-	0.0	-	-	-
22 Debt securities, including UoP ¹	0.0	-	-	-	0.0	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
25 of which loans collateralised by residential immovable property	X	X	X	X	X	X	X	X
26 of which building renovation loans	X	X	X	X	X	X	X	X
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32 Total GAR assets	0.0	-	-	-	0.0	-	-	-

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

² 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	
Disclosure reference date T							
Based on the Turnover KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	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	Proportion of total assets covered
% (compared to total covered assets in the denominator) ²							
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	
1Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6.3	0.9	0.8	0.0	0.0	9.3	
2Financial undertakings	0.5	0.0	-	0.0	0.0	1.4	
3Credit institutions	0.4	0.0	-	0.0	0.0	1.1	
4Loans and advances	0.0	0.0	-	0.0	0.0	0.1	
5Debt securities, including UoP ¹	0.3	0.0	-	0.0	0.0	1.0	
6Equity instruments	-	-	X	-	-	-	
7Other financial corporations	0.1	0.0	-	0.0	0.0	0.2	
8of which investment firms	-	-	-	-	-	-	
9Loans and advances	-	-	-	-	-	-	
10Debt securities, including UoP ¹	-	-	-	-	-	-	
11Equity instruments	-	-	X	-	-	-	
12of which management companies	0.0	0.0	-	0.0	0.0	0.0	
13Loans and advances	0.0	0.0	-	0.0	0.0	0.0	
14Debt securities, including UoP ¹	-	-	-	-	-	0.0	
15Equity instruments	-	-	X	-	-	-	
16of which insurance undertakings	0.0	0.0	-	0.0	0.0	0.0	
17Loans and advances	0.0	0.0	-	0.0	0.0	0.0	
18Debt securities, including UoP ¹	-	-	-	-	-	-	
19Equity instruments	-	-	X	-	-	-	
20Non-financial undertakings	1.9	0.3	0.3	0.0	0.0	2.8	
21Loans and advances	1.8	0.3	0.3	0.0	0.0	2.7	
22Debt securities, including UoP ¹	0.0	0.0	-	0.0	0.0	0.1	
23Equity instruments	-	-	X	-	-	-	
24Households	3.9	0.5	0.5	-	-	3.9	
25of which loans collateralised by residential immovable property	3.2	0.4	0.4	-	-	2.4	
26of which building renovation loans	0.1	-	-	-	-	0.1	
27of which motor vehicle loans	0.0	-	-	-	-	0.0	
28Local governments financing	-	-	-	-	-	1.3	
29Housing financing	-	-	-	-	-	-	
30Other local government financing	-	-	-	-	-	1.3	
31Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	
32Total GAR assets	6.3	0.9	0.8	0.0	0.0	9.3	

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

² 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 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) ²		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
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	6.3	1.0	0.8	0.0	0.1	0.1	0.0	-	0.0
2 Financial undertakings	0.4	0.1	-	0.0	0.0	0.0	0.0	-	0.0
3 Credit institutions	0.3	0.0	-	0.0	0.0	0.0	0.0	-	0.0
4 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
5 Debt securities, including UoP ¹	0.3	0.0	-	0.0	0.0	0.0	0.0	-	0.0
6 Equity instruments	-	-	X	-	-	-	-	X	-
7 Other financial corporations	0.1	0.0	-	0.0	0.0	0.0	0.0	-	0.0
8 of which investment firms	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	-	X	-
12 of which management companies	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
13 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	-	X	-
16 of which insurance undertakings	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
17 Loans and advances	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	-	X	-
20 Non-financial undertakings	2.0	0.4	0.3	0.0	0.1	0.1	0.0	-	0.0
21 Loans and advances	1.9	0.4	0.3	0.0	0.1	0.0	0.0	-	0.0
22 Debt securities, including UoP ¹	0.0	0.0	-	0.0	0.0	0.0	0.0	-	0.0
23 Equity instruments	-	-	X	-	-	-	-	X	-
24 Households	3.9	0.5	0.5	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	3.2	0.4	0.4	-	-	-	-	-	-
26 of which building renovation loans	0.1	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	0.0	-	-	-	-	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-
32 Total GAR assets	6.3	1.0	0.8	0.0	0.1	0.1	0.0	-	0.0

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

² 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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		j	k	l	m	n	o	p	q
Disclosure reference date T									
Based on the CapEx KPI		Water and marine resources (WTR)				Circular economy (CE)			
		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 enabling			Of which Use of Proceeds	Of which enabling	
% (compared to total covered assets in the denominator) ²									
GAR - Covered assets in both numerator and denominator		X	X	X	X	X	X	X	X
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0	-	-	-	0.0	-	-	-
2	Financial undertakings	-	-	-	-	0.0	-	-	-
3	Credit institutions	-	-	-	-	0.0	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-
5	Debt securities, including UoP ¹	-	-	-	-	0.0	-	-	-
6	Equity instruments	-	-	X	-	-	-	X	-
7	Other financial corporations	-	-	-	-	0.0	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-
10	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	X	-	-	-	X	-
12	of which management companies	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-
14	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	X	-	-	-	X	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-
18	Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	X	-	-	-	X	-
20	Non-financial undertakings	0.0	-	-	-	0.0	-	-	-
21	Loans and advances	0.0	-	-	-	0.0	-	-	-
22	Debt securities, including UoP ¹	0.0	-	-	-	0.0	-	-	-
23	Equity instruments	-	-	X	-	-	-	X	-
24	Households	X	X	X	X	-	-	-	-
25	of which loans collateralised by residential immovable property	X	X	X	X	-	-	-	-
26	of which building renovation loans	X	X	X	X	-	-	-	-
27	of which motor vehicle loans	X	X	X	X	X	X	X	X
28	Local governments financing	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32	Total GAR assets	0.0	-	-	-	0.0	-	-	-

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

² 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.

	r	s	t	u	v	w	x	z
Disclosure reference date T								
Based on the CapEx KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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) ²				% (compared to total covered assets in the denominator) ²			
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.0	-	-	0.0	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	X	-	-	-	X	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-	X	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	X	-	-	-	X	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP ¹	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-	X	-
20 Non-financial undertakings	0.0	-	-	0.0	-	-	-	-
21 Loans and advances	0.0	-	-	0.0	-	-	-	-
22 Debt securities, including UoP ¹	0.0	-	-	-	-	-	-	-
23 Equity instruments	-	-	X	-	-	-	X	-
24 Households	X	X	X	X	X	X	X	X
25 of which loans collateralised by residential immovable property	X	X	X	X	X	X	X	X
26 of which building renovation loans	X	X	X	X	X	X	X	X
27 of which motor vehicle loans	X	X	X	X	X	X	X	X
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32 Total GAR assets	0.0	-	-	0.0	-	-	-	-

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

² 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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Disclosure reference date T						
Based on the CapEx KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					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)				
		Of which Use of Proceeds	Of which transitional	Of which enabling		
% (compared to total covered assets in the denominator) ²						
GAR - Covered assets in both numerator and denominator	X	X	X	X	X	X
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6.4	1.1	0.8	0.0	0.1	9.3
2 Financial undertakings	0.4	0.1	-	0.0	0.0	1.4
3 Credit institutions	0.4	0.0	-	0.0	0.0	1.1
4 Loans and advances	0.0	0.0	-	0.0	0.0	0.1
5 Debt securities, including UoP ¹	0.3	0.0	-	0.0	0.0	1.0
6 Equity instruments	-	-	X	-	-	-
7 Other financial corporations	0.1	0.0	-	0.0	0.0	0.2
8 of which investment firms	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-
10 Debt securities, including UoP ¹	-	-	-	-	-	-
11 Equity instruments	-	-	X	-	-	-
12 of which management companies	0.0	0.0	-	0.0	0.0	0.0
13 Loans and advances	0.0	0.0	-	0.0	0.0	0.0
14 Debt securities, including UoP ¹	-	-	-	-	-	0.0
15 Equity instruments	-	-	X	-	-	-
16 of which insurance undertakings	0.0	0.0	-	0.0	0.0	0.0
17 Loans and advances	0.0	0.0	-	0.0	0.0	0.0
18 Debt securities, including UoP ¹	-	-	-	-	-	-
19 Equity instruments	-	-	X	-	-	-
20 Non-financial undertakings	2.0	0.4	0.3	0.0	0.1	2.8
21 Loans and advances	2.0	0.4	0.3	0.0	0.1	2.7
22 Debt securities, including UoP ¹	0.0	0.0	-	0.0	0.0	0.1
23 Equity instruments	-	-	X	-	-	-
24 Households	3.9	0.5	0.5	-	-	3.9
25 of which loans collateralised by residential immovable property	3.2	0.4	0.4	-	-	2.4
26 of which building renovation loans	0.1	-	-	-	-	0.1
27 of which motor vehicle loans	0.0	-	-	-	-	0.0
28 Local governments financing	-	-	-	-	-	1.3
29 Housing financing	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	1.3
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
32 Total GAR assets	6.4	1.1	0.8	0.0	0.1	9.3

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

² 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.

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

		a	b	c	d	e	f	g	h	i
Disclosure reference date T										
Stock KPI - based on the Turnover KPI	% (compared to total eligible off-balance sheet assets)	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)				
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		
1	Financial guarantees (FinGuar KPI)	11.8	1.3	-	0.0	1.1	0.1	0.0	-	-
2	Assets under management (AuM KPI)	54.4	9.8	9.0	0.0	0.6	0.1	0.0	-	0.0

		j	k	l	m	n	o	p	q
Disclosure reference date T									
Stock KPI - based on the Turnover KPI	% (compared to total eligible off-balance sheet assets)	Water and marine resources (WTR)			Circular economy (CE)				
		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)	Of which		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which			
			Use of Proceeds	enabling		Use of Proceeds			
1	Financial guarantees (FinGuar KPI)	0.1	-	-	-	0.9	-	-	-
2	Assets under management (AuM KPI)	0.0	-	-	-	0.2	-	-	-

		r	s	t	u	v	w	x	z
Disclosure reference date T									
Stock KPI - based on the Turnover KPI	% (compared to total eligible off-balance sheet assets)	Pollution (PPC)			Biodiversity and Ecosystems (BIO)				
		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)	Of which		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which			
			Use of Proceeds	enabling		Use of Proceeds			
1	Financial guarantees (FinGuar KPI)	0.1	-	-	-	0.0	-	-	-
2	Assets under management (AuM KPI)	0.2	-	-	-	0.0	-	-	-

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Disclosure reference date T	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
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)	13.0	1.3	-	0.0	1.1
2 Assets under management (AuM KPI)	54.9	9.9	9.0	0.0	0.6

5. KPI off-balance sheet exposures 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)			
Flow 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)	6.0	0.1	-	0.0	0.1	0.0	0.0	-	-
2 Assets under management (AuM KPI)	8.5	4.6	4.1	0.0	0.3	0.1	0.0	-	0.0

	j	k	l	m	n	o	p	q
Disclosure reference date T	Water and marine resources (WTR)			Circular economy (CE)				
Flow 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 enabling			Of which Use of Proceeds	Of which enabling
1 Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	0.0	-	-	-	0.2	-	-	-

	r	s	t	u	v	w	x	z
Disclosure reference date T								
Flow KPI - based on the Turnover KPI	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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)			
1 Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	0.2	-	-	-	0.0	-	-	-

	aa	ab	ac	ad	ae
Disclosure reference date T					
Flow KPI - based on the Turnover KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	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)				
1 Financial guarantees (FinGuar KPI)	6.0	0.1	-	0.0	0.1
2 Assets under management (AuM KPI)	9.0	4.6	4.1	0.0	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										
Stock KPI - 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 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)	13.7	1.6	-	0.1	1.2	0.4	0.0	-	0.0
2	Assets under management (AuM KPI)	55.1	10.5	9.0	0.0	0.9	0.3	0.0	-	0.0

		j	k	l	m	n	o	p	q
Disclosure reference date T									
Stock KPI - based on the CapEx KPI	% (compared to total eligible off-balance sheet assets)	Water and marine resources (WTR)			Circular economy (CE)				
		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 enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.0	-	-	-	0.5	-	-	-
2	Assets under management (AuM KPI)	0.0	-	-	-	0.1	-	-	-

		r	s	t	u	v	w	x	z
Disclosure reference date T									
Stock KPI - based on the CapEx KPI	% (compared to total eligible off-balance sheet assets)	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		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 enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.0	-	-	-	0.0	-	-	-
2	Assets under management (AuM KPI)	0.1	-	-	-	0.0	-	-	-

	aa	ab	ac	ad	ae
Disclosure reference date T					
Stock KPI - based on the CapEx KPI % (compared to total eligible off-balance sheet assets)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	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)	14.7	1.6	-	0.1	1.2
2 Assets under management (AuM KPI)	55.6	10.6	9.0	0.0	0.9

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

		a	b	c	d	e	f	g	h	i
Disclosure reference date T										
Flow KPI - based on the CapEx KPI	% (compared to total eligible off-balance sheet assets)	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)				
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	6.0	0.1	-	0.0	0.1	0.0	0.0	-	0.0
2	Assets under management (AuM KPI)	8.3	4.6	4.1	0.0	0.3	0.2	0.0	-	0.0

		j	k	l	m	n	o	p	q
Disclosure reference date T									
Flow KPI - based on the CapEx KPI	% (compared to total eligible off-balance sheet assets)	Water and marine resources (WTR)			Circular economy (CE)				
		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 enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	-	-	-	-	0.0	-	-	-
2	Assets under management (AuM KPI)	0.0	-	-	-	0.1	-	-	-

		r	s	t	u	v	w	x	z
Disclosure reference date T									
Flow KPI - based on the CapEx KPI	% (compared to total eligible off-balance sheet assets)	Pollution (PPC)			Biodiversity and Ecosystems (BIO)				
		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 enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	0.1	-	-	-	0.0	-	-	-

	aa	ab	ac	ad	ae
Disclosure reference date T					
Flow KPI - based on the CapEx KPI	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	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)	6.0	0.1	-	0.0	0.1
2 Assets under management (AuM KPI)	8.8	4.6	4.1	0.0	0.3

Nuclear and fossil gas related activities

Zeile	Tätigkeiten	Yes/No
Nuclear energy related activities		
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.	Yes
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
Fossil gas related activities		
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

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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 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	0	0.0	0	0.0	-	-
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 denominator of the applicable KPI	30	0.0	30	0.0	-	-
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 denominator of the applicable KPI	0	0.0	0	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 denominator 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 denominator of the applicable KPI	0	0.0	0	0.0	-	-
7.	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	14 049	3.3	14 034	3.3	15	0.0
8.	Total applicable KPI	14 081	3.3	14 066	3.3	15	0.0

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 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	0	0.0	0	0.0	-	-
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	3	0.0	3	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 denominator of the applicable KPI	24	0.0	24	0.0	-	-
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 denominator of the applicable KPI	10	0.0	10	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 denominator of the applicable KPI	7	0.0	7	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 denominator of the applicable KPI	1	0.0	1	0.0	-	-
7.	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	15 116	3.6	15 041	3.6	75	0.0
8.	Total applicable KPI	15 161	3.6	15 086	3.6	75	0.0

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	0	0.0	0	0.0	-	-
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	30	0.2	30	0.2	-	-
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	0	0.0	0	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.	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	14 049	99.8	14 034	99.8	15	100.0
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	14 081	100.0	14 066	100.0	15	100.0

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	0	0.0	0	0.0	-	-
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	3	0.0	3	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	24	0.2	24	0.2	-	-
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	10	0.1	10	0.1	-	-
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	7	0.0	7	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	1	0.0	1	0.0	-	-
7.	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	15 116	99.7	15 041	99.7	75	100.0
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	15 161	100.0	15 086	100.0	75	100.0

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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	0	0.0	0	0.0	-	-
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	1	0.0	1	0.0	-	-
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	1	0.0	1	0.0	-	-
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	45	0.0	45	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	20	0.0	20	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.	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	137 502	32.5	136 917	32.4	585	0.1
8.	Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	137 570	32.5	136 986	32.4	585	0.1

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	0	0.0	0	0.0	-	-
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	1	0.0	1	0.0	-	-
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	18	0.0	17	0.0	1	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	10	0.0	10	0.0	0	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.	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	136 514	32.3	135 782	32.1	732	0.2
8.	Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	136 545	32.3	135 811	32.1	734	0.2

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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	6	0.0
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	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	13	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	7	0.0
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	3	0.0
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	6	0.0
7.	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	270 996	64.1
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	271 034	64.1

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	3	0.0
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	14	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	7	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	6	0.0
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	0	0.0
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.	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	270 949	64.1
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	270 979	64.1

Note on the EU taxonomy tables

In the tables of the EU Taxonomy in this annex, cells filled with "-" indicate no exposure. In some cases, rounding results in a figure of 0 million euros or 0.0%.

Assurance Report of the independent German Public Auditor

on a limited assurance engagement in relation to
the Group Sustainability Report¹

To Commerzbank AG,
Frankfurt/Main

Assurance conclusion

We have conducted a limited assurance engagement on the Group Sustainability Report, included in a separate section within the combined management report, of Commerzbank AG for the financial year from 1st January to 31st December 2024. The Group Sustainability Report was prepared to fulfil the requirements of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 (Corporate Sustainability Statement Directive, CSRD) and Article 8 of Regulation (EU) 2020/852 as well as Sections 315b and 315c of the HGB as well as § 340i Abs. 5 HGB for a Combined non-financial statement and Sections §§ 289b to 289e of the HGB as well as § 340a Abs. 1a HGB for a non-financial statement of the company.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the accompanying Group Sustainability Report is not prepared, in all material respects, in accordance with the requirements of the CSRD and Article 8 of Regulation (EU) 2020/852, Sections 315b and 315c HGB as well as § 340i Abs. 5 HGB for a Combined non-financial statement, Sections §§ 289b to 289e of the HGB as well as § 340a Abs. 1a HGB for a non-financial statement of the company and the supplementary criteria presented by the executive directors of the Company. This assurance conclusion includes that nothing has come to our attention that causes us to believe that:

- the accompanying Group Sustainability Report does not comply, in all material respects, with the European Sustainability Statement Standards (ESRS), including that the process carried out by the entity to identify information to be included in the Group Sustainability Report (the materiality

assessment) is not, in all material respects, in accordance with the description set out in the Group Sustainability Report, or

- the disclosures in section “Disclosures regarding Article 8 of Regulation 2020/852 (EU-Taxonomy)” of the Group Sustainability Report do not comply, in all material respects, with Article 8 of Regulation (EU) 2020/852.

Basis for the Assurance Conclusion

We conducted our 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 International Auditing and Assurance Standards Board (IAASB).

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in the section “German Public Auditor’s Responsibilities for the Assurance Engagement on the Group Sustainability Report”.

We are independent of the entity in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our audit firm has applied the requirements for a system of quality control as set forth in the IDW Quality Management Standard issued by the Institut der Wirtschaftsprüfer [Institute of Public Auditors in Germany] (IDW): Requirements for Quality Management in the Audit Firm (IDW QMS 1 (09.2022)) and International Standard on Quality Management (ISQM) 1 issued by the IAASB. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

¹ Our engagement applied to the German version of Group Sustainability Report. This text is a translation of the Independent Assurance Report issued in German, whereas the German text is authoritative.

Responsibilities of the Executive Directors and the Supervisory Board for the Group Sustainability Report

The executive directors are responsible for the preparation of the Group Sustainability Report in accordance with the requirements of the CSRD and the applicable German legal and other European requirements as well as with the supplementary criteria presented by the executive directors of the Company and for designing, implementing and maintaining such internal control that they have considered necessary to enable the preparation of a Group Sustainability Report in accordance with these requirements that is free from material misstatement, whether due to fraud (i.e., fraudulent Sustainability Statement in the Group Sustainability Report) or error.

This responsibility of the executive directors includes establishing and maintaining the materiality assessment process, selecting and applying appropriate reporting policies for preparing the Group Sustainability Report, as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The Supervisory Board is responsible for overseeing the process for the preparation of the Group Sustainability Report.

Inherent Limitations in Preparing the Group Sustainability Report

The CSRD and the applicable German legal and other European requirements contain wording and terms that are subject to considerable interpretation uncertainties and for which no authoritative, comprehensive interpretations have yet been published. Therefore, the executive directors are responsible for the reasonableness of these interpretations by Commerzbank AG. As such wording and terms may be interpreted differently by regulators or courts, the legality of measurements or evaluations of sustainability matters based on these interpretations is uncertain.

These inherent limitations also affect the assurance engagement on the Group Sustainability Report.

German Public Auditor's Responsibilities for the Assurance Engagement on the Group Sustainability Report

Our objective is to express a limited assurance conclusion, based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the Group Sustainability Report has not been prepared, in all material respects, in accordance with the CSRD, the applicable German legal and other European requirements and the supplementary criteria presented by the company's executive directors, and to issue an assurance report that includes our assurance conclusion on the Group Sustainability Report.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgment and maintain professional skepticism. We also:

- obtain an understanding of the process used to prepare the Group Sustainability Report, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Group Sustainability Report.
- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. In addition, the risk of not detecting a material misstatement in information obtained from sources not within the entity's control (value chain information) is ordinarily higher than the risk of not detecting a material misstatement in information obtained from sources within the entity's control, as both the entity's executive directors and we as practitioners are ordinarily subject to restrictions on direct access to the sources of the value chain information.
- consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

Summary of the Procedures Performed by the German Public Auditor

A limited assurance engagement involves the performance of procedures to obtain evidence about the sustainability information. The nature, timing and extent of the selected procedures are subject to our professional judgment.

In performing our limited assurance engagement, we:

- evaluated the suitability of the criteria as a whole presented by the executive directors in the Group Sustainability Report.
- inquired executive directors and relevant employees involved in the preparation of the Group Sustainability Report about the preparation process, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Group Sustainability Report, and about the internal controls relating to this process.
- evaluated the reporting policies used by the executive directors to prepare the Group Sustainability Report.
- evaluated the reasonableness of the estimates and related information provided by the executive directors. If, in accordance with the ESRS, the executive directors estimate the value chain information to be reported for a case in which the executive directors are unable to obtain the information from the value chain despite making reasonable efforts, our assurance engagement is limited to evaluating whether the executive directors have undertaken these estimates in accordance with the ESRS and assessing the reasonableness of these estimates, but does not include identifying information in the value chain that the executive directors were unable to obtain.
- performed analytical procedures and made inquiries in relation to selected information in the Group Sustainability Report.
- considered the presentation of the information in the Group Sustainability Report.
- considered the process for identifying taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Group Sustainability Report.

Restriction of Use/Clause on General Engagement Term

This assurance report is solely addressed to Commerzbank AG.

The engagement, in the performance of which we have provided the services described above on behalf of Commerzbank AG, was carried out on the basis of the General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften (Allgemeine Auftragsbedingungen für Wirtschaftsprüferinnen, Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften) dated as of January 1, 2024 (www.kpmg.de/AAB_2024). By taking note of and using the information as contained in our report each recipient confirms to have taken note of the terms and conditions stipulated in the aforementioned General Engagement Terms (including the liability limitations specified in item No. 9 included therein) and acknowledges their validity in relation to us.

Frankfurt/Main, 4 March 2025

KPMG AG
 Wirtschaftsprüfungsgesellschaft
 (Original German version signed by:)

Wiechens
 Wirtschaftsprüfer
 (German Public Auditor)

Protze
 Wirtschaftsprüfer
 (German Public Auditor)