

# Annex 7

## Overview- Compliance with CRR requirements

Commerzbank Group's compliance with the CRR requirements as at 31 December 2023 is given in detail in the following overview.

## Overview – Compliance with the CRR requirements

| Article CRR     | Topic   | Reference to disclosure<br>(Chapter of Disclosure Report or reference to separate document)   | Tables           |
|-----------------|---|---|------------------|
| 431 - 434       | Scope of disclosure requirements<br>Non-material, proprietary or confidential information<br>Frequency and means of disclosures | Introduction > Objective of the Disclosure Report<br>Introduction > Scope<br>Introduction > Waiver rule pursuant to Article 7 CRR   | –                |
| 435(1) a) - d)  | Risk management objectives and policies   | Risk-oriented overall bank management<br>> Risk management organisation<br>> Risk strategy and risk management<br>> Risk-bearing capacity and stress testing  | –                |
|                 |   | Specific risk management<br>> A. Credit risk > Risk management<br>> B. Counterparty credit risk > Risk management<br>> C. Securitisations > Risk management<br>> D. Market risk > Risk management<br>> E. Liquidity risk<br>> F. Operational risk > Risk management   | –                |
| 435(1) e), f)   | Risk management objectives and policies   | Risk-oriented overall bank management<br>> Risk statement<br>Equity capital, capital requirement and RWA<br>> Connection between balance-sheet and regulatory positions   | –                |
| 435(2) a) - d)  | Governance arrangements   | Risk-oriented overall bank management<br>> Risk management organisation<br>> Corporate governance information pursuant to Article 435 (2) CRR<br><br>Annual Report 2023:<br>> Declaration on corporate governance<br>Homepage:<br><a href="https://www.commerzbank.de/en/hauptnavigation/aktionaere/governance/_corporate_governance_1.html">https://www.commerzbank.de/en/hauptnavigation/aktionaere/governance/_corporate_governance_1.html</a> | Annex 3          |
| 435(2) e)       | Governance arrangements   | Risk-oriented overall bank management<br>> Risk management organisation<br>> Risk strategy and risk management  | –                |
| 436 a)          | Scope of application  | Introduction > Scope  | –                |
| 436 b) - d)     | Scope of application  | Equity capital, capital requirement and RWA > Connection between balance-sheet and regulatory positions   | EU LI1<br>EU LI2 |
|                 |   | Annex 1: Outline of the differences in the scopes of consolidation (entity by entity)   | EU LI3           |
| 436 e)          | Scope of application  | Equity capital, capital requirement and RWA > Connection between balance-sheet and regulatory positions   | EU PV1           |
| 436 f), g)      | Scope of application  | Equity capital, capital requirement and RWA > Connection between balance-sheet and regulatory positions   | –                |
| 436 h)          | Scope of application  | Introduction > Waiver rule pursuant to Article 7 CRR  | –                |
| 437 a), d) - f) | Own funds   | Equity capital, capital requirement and RWA<br>> Capital structure<br>> Connection between balance-sheet and regulatory positions   | EU CC1<br>EU CC2 |
| 437 b), c)      | Own funds   | Annex 6: Main Features of issued Capital Instruments as of 31 December 2023<br><br>Additionally on the homepage:<br><a href="https://investor-relations.commerzbank.com/debt-holders-information/capital-instruments/">https://investor-relations.commerzbank.com/debt-holders-information/capital-instruments/</a>   | Annex 6          |
| 438 a) - c)     | Capital requirements  | Risk-oriented overall bank management > Risk-bearing capacity and stress testing  | RBC1             |
|                 |   | Equity capital, capital requirement and RWA > Key metrics   | EU KM1           |
| 438 d)          | Capital requirements  | Equity capital, capital requirement and RWA > Capital requirement and RWA   | EU OV1           |
| 438 e)          | Capital requirements  | Specific risk management<br>> A. Credit risk > Credit risk and credit risk mitigation in the IRBA   | EU CR10.2        |
| 438 h)          | Capital requirements  | Specific risk management<br>> A. Credit risk > Credit risk and credit risk mitigation in the IRBA   | EU CR8           |

| Article CRR            | Topic   | Reference to disclosure<br>(Chapter of Disclosure Report or reference to separate document)                             | Tables   |
|------------------------|---|---|--|
|                        |   | Specific risk management<br>> B. Counterparty credit risk > Information by regulatory risk-weighting approach           | EU CCR7  |
|                        |   | Specific risk management<br>> D. Market risk > Quantitative information on market risks                                 | EU MR2-B   |
| 439 a) - d)            | Counterparty credit risk  | Specific risk management<br>> B. Counterparty credit risk > Risk management   | -  |
| 439 f), g), h), k), m) | Counterparty credit risk  | Specific risk management<br>> B. Counterparty credit risk > Information on regulatory methods                           | EU CCR1<br>EU CCR2<br>EU CCR3                            |
| 439 e), h), j), l)     | Counterparty credit risk  | Specific risk management<br>> B. Counterparty credit risk > Information by regulatory risk-weighting approach           | EU CCR4<br>EU CCR5<br>EU CCR6<br>EU CCR7                 |
| 439 d), i)             | Counterparty credit risk  | Specific risk management<br>> B. Counterparty credit risk > Further information on counterparty credit risk             | EU CCR8<br>addCCR1                                       |
| 440                    | Countercyclical capital buffers   | Equity capital, capital requirement and RWA > Capital requirement and RWA   | EU CCyB1<br>EU CCyB2                                     |
| 441                    | Indicators of global systemic importance                                  | Equity capital, capital requirement and RWA > Disclosure of information on the indicators of global systemic importance | Annex 2  |
| 442 a) - b)            | Credit risk and dilution risk   | Specific risk management<br>> A. Credit risk > Loan loss provisions for default risks                                   | -  |
| 442 c), e), f)         | Credit risk and dilution risk   | Specific risk management<br>> A. Credit risk > Loan loss provisions for default risks                                   | EU CR1<br>EU CR2<br>EU CQ1<br>EU CQ4<br>EU CQ5<br>EU CQ7 |
| 442 d)                 | Credit risk and dilution risk   | Specific risk management<br>> A. Credit risk > Loan loss provisions for default risks                                   | EU CQ3   |
| 442 g)                 | Credit risk and dilution risk   | Specific risk management<br>> A. Credit risk > Loan loss provisions for default risks                                   | EU CR1-A   |
| 443                    | Unencumbered assets   | Specific risk management<br>> E. Liquidity risk > Information on the encumbrance of assets                              | EU AE1<br>EU AE2<br>EU AE3                               |
| 444 a) - e)            | Use of the Standardised Approach  | Specific risk management<br>> A. Credit risk > Credit risk and credit risk mitigation in the SACR                       | EU CR4<br>EU CR5   |
| 444 e)                 | Use of the Standardised Approach  | Specific risk management<br>> B. Counterparty credit risk > Information on regulatory methods                           | EU CCR3  |
| 445                    | Market risk   | Specific risk management<br>> D. Market risk > Quantitative information on market risks                                 | EU MR1   |
| 446 a) - c)            | Operational risk management   | Specific risk management<br>> F. Operational risk   | EU OR1   |
| 447 a) - g)            | Key metrics   | Equity capital, capital requirement and RWA > Key metrics   | EU KM1   |
| 448                    | Exposures to interest rate risk on positions not held in the trading book | Specific risk management<br>> D. Market risk > Interest rate risk in the banking book                                   | EU IRRBB1  |
| 449                    | Exposure to securitisation positions                                      | Specific risk management<br>> C. Securitisations  | EU SEC1<br>EU SEC2<br>EU SEC3<br>EU SEC4<br>EU SEC5      |
| 449a                   | Environmental, social and governance risks (ESG risks)                    | Risk-oriented overall bank management > Environmental, social and governance (ESG) risks pursuant to Article 449a CRR   | Annex 4  |
| 450                    | Remuneration policy   | Risk-oriented overall bank management > Remuneration information pursuant to Article 450 CRR                            | Annex 5  |
| 451                    | Leverage ratio  | Leverage Ratio  | EU LR1<br>EU LR2   |

| Article CRR      | Topic  | Reference to disclosure<br>(Chapter of Disclosure Report or reference to separate document)  | Tables                                     |
|------------------|--|--|--|
|                  |  |  | EU LR3                                     |
| 451a (2) a) - c) | Liquidity requirements   | Specific risk management > E. Liquidity risk > Liquidity Coverage Ratio  | EU LIQ1<br>addLIQ3                         |
| 451a (3)         | Liquidity requirements   | Specific risk management > E. Liquidity risk > Liquidity Coverage Ratio  | EU LIQ2                                    |
| 451a (4)         | Liquidity requirements   | Specific risk management > E. Liquidity risk > Risk management > Liquidity risk model  | addLIQ1<br>addLIQ2                         |
| 452 a) - e)      | Use of the IRB Approach to credit risk                         | Specific risk management > A. Credit risk > Risk management > Credit risk model  | EU CR6-A                                   |
| 452 f)           | Use of the IRB Approach to credit risk                         | Specific risk management > A. Credit risk > Credit risk model  | EU CR6-A<br>VAL-A<br>VAL-B<br>VAL1<br>VAL2 |
| 452 g)           | Use of the IRB Approach to credit risk                         | Specific risk management > A. Credit risk > Credit risk and credit risk mitigation in the IRBA   | EU CR6                                     |
|                  |  | Specific risk management > B. Counterparty credit risk > Information by regulatory risk-weighting approach   | EU CCR4                                    |
| 452 h)           | Use of the IRB Approach to credit risk                         | Specific risk management > A. Credit risk > Credit risk model  | EU CR9<br>EU CR9.1                         |
| 453 a) - e)      | Use of credit risk mitigation techniques                       | Specific risk management > A. Credit risk > Credit risk mitigation > B. Counterparty credit risk > Risk management   | -  |
| 453 f)           | Use of credit risk mitigation techniques                       | Specific risk management > A. Credit risk > Credit risk mitigation   | EU CR3                                     |
| 453 g) - j)      | Use of credit risk mitigation techniques                       | Specific risk management > A. Credit risk > Credit risk and credit risk mitigation in the SACR > A. Credit risk > Credit risk and credit risk mitigation in the IRBA | EU CR4<br>EU CR7<br>EU CR7-A               |
| 454              | Use of the Advanced Measurement Approaches to operational risk | Specific risk management > F. Operational risk   | -  |
| 455 a), b)       | Use of Internal Market Risk Models                             | Specific risk management > D. Market risk > Risk management > D. Market risk > Market risk model   | -  |
| 455 c)           | Use of Internal Market Risk Models                             | Specific risk management > D. Market risk > Risk management > Tradability and measurement of financial instruments   | -  |
| 455 d) - f)      | Use of Internal Market Risk Models                             | Specific risk management > D. Market risk > Quantitative information on market risks   | EU MR2-A<br>EU MR3<br>addMR1               |
| 455 g)           | Use of Internal Market Risk Models                             | Specific risk management > D. Market risk > Market risk model  | EU MR4                                     |