

Definitions of risk levels for deficiencies according to MaRisk and for findings

RISK LEVEL:

The classification of **deficiencies according to MaRisk** reflects the relevance of a deficiency (as result of single finding or aggregation of findings) for the Commerzbank-Group.

Particularly Severe Deficiency:

Under consideration of the risk types in accordance with the risk inventory of Commerzbank Group a critical threat potential for the entity's business exists from an overall perspective. An immediate reporting by the Management of the Entity to the Supervisory Body is required.

Severe Deficiency:

Under consideration of the risk types in accordance with the risk inventory of Commerzbank Group a considerable threat potential for the entity's business exist from an overall perspective. An immediate reporting to the Management of the Unit is required.

Material Deficiency:

Under consideration of the risk types in accordance with the risk inventory of Commerzbank Group a collateral threat potential for entity's business exists from an overall perspective. A reporting to the Management of the Entity as well as to the Supervisory Body along with the Audit Annual Report is required.

No Material Deficiency:

Under consideration of the risk types in accordance with the risk inventory of Commerzbank Group a minor threat potential for entity's business exists from an overall perspective. The information of the Management in addition to the individual audit reports is not required.

The classification of the underlying **single findings** (high, medium, low) reflects the relevance of deficiencies based on a (single) finding with regard to the audited unit.

High (↑):

Under consideration of the risk types in accordance with the risk inventory of Commerzbank Group - as far as relevant for the area audited - and based on the finding, significant deficiencies exist for the area audited. These deficiencies affect, for example, critical business processes or have significant reputational or regulatory effects. Strict control over the timely implementation of the agreed corrective action as well as the involvement of the responsible management is necessary.

Medium (→):

Under consideration of the risk types in accordance with the risk inventory of Commerzbank Group - as far as relevant for the area audited - and based on the finding, deficiencies exist for the area audited. These deficiencies concern, for example, the interruption of business processes, lead to customer or supervisory complaints. The responsible management should ensure that evidence over the timely implementation of the agreed corrective action is being provided.

Low (↓):

Under consideration of the risk types in accordance with the risk inventory of Commerzbank Group - as far as relevant for the area audited - and based on the finding, minor deficiencies exist for the area audited. The impact on customer and business processes is limited. The corrective action can be implemented during the regular course of business.