



COMMERZBANK

Public Affairs

Guideline for Political Communication

Commerzbank is the leading bank for the German Mittelstand. In addition, the Bank is a strong partner for around 25,500 corporate client groups and almost 11 million private and small-business customers in Germany. The Bank's two Business Segments – Private and Small-Business Customers and Corporate Clients – offer a comprehensive portfolio of financial services. Commerzbank transacts approximately 30% of Germany's foreign trade and is present internationally in more than 40 countries in the corporate clients' business. The Bank focusses on the German Mittelstand, large corporates, and institutional clients. It therefore plays an important and responsible role in relation to economic and social policy. Commerzbank is also considered to be of national systemic importance.

"It is legitimate to cultivate contacts between, on the one hand, politicians and civil servants who are committed to the common good, and, on the other hand, organizations with their own individual goals. The purpose is the exchange of information and the reconciliation of different opinions and situation analyses. This allows particular demands or expectations of policy to be presented, and thereby exposes them to public debate about

conflicting wishes. It therefore serves better understanding on all sides and supports decisions based on the common good."¹

Consequently, politicians and the public expect the Bank to comment on relevant economic issues. By engaging in an active and constructive dialogue with stakeholders, Commerzbank therefore takes the opportunity to familiarize itself with the various expectations and needs of its interest groups, where necessary to assist in decision-making and planning for its corporate strategy, and to present its own points of view – also at the political level.

Commerzbank has fulfilled its increased political responsibility by establishing the "Public Affairs" division which acts as a conduit between contact offices in Berlin and Brussels and Issue Management in Frankfurt, and an office at the International Institute of Finance (IIF) in Washington. By representing various interests, it is an integral part of the democratic opinion-forming process and seeks to promote informed and sound decisions geared to the common good. The main focus is to explain issues relevant to banks and the financial market. In so doing, we help politicians and administrators to develop and enhance their sector-related knowledge as the basis for making informed decisions. We call this approach "smart lobbying".

Commerzbank attaches great value to integrated and professionally grounded communication with political stakeholders as well as organisations and the public. The Bank develops structures and platforms for political communications and does not rely solely on personal networks. Already established structures also encourage continuity, also in relation to regular changes in policy.

Public Affairs follows the current debate on political and regulatory issues in Germany, Europe and internationally. Draft legislation is also monitored and analysed to enable the Bank to develop its own positions on the relevant topics.

Commerzbank also maintains close links with academics and researchers. The Bank participates in events connected with

¹ German Public Relations Council (DRPR): Guideline for Cultivation of Contacts in the Public Arena.

politically relevant issues and engages in an open and transparent dialogue with important political and social stakeholders.

Commerzbank and its representatives for special interests welcome initiatives for more transparency in politics. Therefore, we are registered in the [Lobbying Register](#) (German only) for the representation of special interests to the German Bundestag and the Federal Government. Here we report on our persons acting, memberships, annual expenses, and objectives of political interest representation. In addition, Commerzbank has been registered in the [EU Transparency Register](#) since 2011 and reports on persons acting, memberships and annual expenditures associated with political interest representation.

Moreover, Commerzbank complies with the [Guideline for Cultivation of Contacts](#) (German only) in the Political Arena of the German Public Relations Council (DRPR) and the [Political Lobbying Principles](#) (German only) of the Association of German Banks (BdB).

Principles of political lobbying

Integrity and trustworthiness are the cornerstones of Commerzbank's business.

In accordance with its Corporate Values, Code of Conduct and Corporate Responsibility Guidelines, Commerzbank acknowledges political lobbying which does not contradict its publicly stated positions (One-Voice).

By registering in the German Lobbying Register, Commerzbank and its representatives of special interests have committed themselves to complying with the [Code of Conduct](#) (German only) laid down by the German Bundestag and the Federal Government with the participation of civil society.

Openness, transparency, honesty and integrity are essential prerequisites for a serious interest representation.

Trustworthiness through transparency

Company representatives (and advisors acting on the Bank's behalf) are obliged to acknowledge that they represent Commerzbank AG by stating their function and interests when interacting with political stakeholders and other interest groups.

The objective is to explain the Bank's business interests openly and to ensure that the information provided reflects the Bank's current knowledge base fully and unambiguously. Registered representatives of special interests shall refer to their registration on their initial contact with the respective bodies, Members,

parliamentary groups or groupings of the German Bundestag or with the respective members of the Federal Government at the level of Parliamentary State Secretaries, State Secretaries, Heads of Directorates-General, Heads of Directorates, and Heads of Division. Moreover, contact to political actors must be made exclusively by registered representatives for special interest. If Commerzbank fulfills certain criteria, it must inform which lobbying is carried out for which reason (so called regulatory proposals according to the German Lobbying Register). Furthermore, written positions on relevant regulatory-political topics must also be uploaded as essential comments/expert opinions in order to provide more content on regulatory proposals.

Commerzbank as a company does not make donations to political parties. Membership fees to political-relevant associations are not regarded as donations. Organisations of which Commerzbank is a member are responsible for their own donations based on the respective legal rules, with particular account taken of the law which applies to political parties.

Honesty, integrity and probity

Commerzbank does not actively support any political party.

The Bank takes all measures necessary to ensure that it complies with the law and with other regulations and that it acts honestly.

Accordingly, within the context of its political lobbying, Commerzbank undertakes not to obtain any information by improper means, or to exert influence on decisions by improper means, or to make any such attempts to do so:

- Gifts to public officials, Politically Exposed Persons (PEP), representatives of public institutions, civil servants, public service employees and politicians are prohibited. The only exceptions are small items, within the context of, for example, events which, while adhering strictly to public transparency requirements, reflect the Group's respect for a public office or a political role. Approval must be obtained for any such gifts and they must be documented.
- Other material benefits – such as invitations, events, endorsements etc. – must serve the exchange of information, take place within an appropriate context, and may not be carried out for improper purposes.
- Confidential information obtained by representatives of special interests in the context of representing special interests shall only be used or passed on in a permissible way and as agreed in each instance.
- Representatives of special interests shall also refrain from making false claims alleging the existence of a contractual, personal or advisory relationship with political decision-makers.