



COMMERZBANK

Group Compliance

Sanctions Compliance

Information regarding restrictions on our business operations in connection with financial and economic sanctions

Commerzbank regards itself as a fair and competent bank, which is a reliable and long-term partner for its customers and business partners – transparent and responsible.

Compliance is part of our corporate culture and forms the foundation for our corporate responsibility. We are committed to the highest ethical values, to integrity and fairness, undertaking to comply with all prevailing legislation and regulations as well as market standards. This is the basis on which we build trust with our customers and business partners.

In order to manage the ever-growing complexity of national and international regulations, Commerzbank is continuously enhancing its compliance risk management, amending it in line with current developments and challenges.

Financial and economic sanctions

Group Compliance ensures that financial and economic sanctions as well as supplementary regulatory requirements applicable to the business activities of Commerzbank are observed. To this end Group Compliance enacts guidelines and instructions, for example risk-oriented restrictions on business operations of Commerzbank.

In addition to the risks arising from the applicable financial and economic sanctions, other risks are also taken into account, for example money laundering and terrorism financing as well as fraud and corruption.

The groupwide minimum standards of Commerzbank may be stricter than the applicable legal regulations. They include

various measures, ranging from the prohibition of certain transactions to the complete stop of our business operations.

This serves to protect our customers and business partners as well as Commerzbank and its employees.

Restrictions on business operations

On the basis of our Code of Conduct in connection with the current threat situation, Commerzbank has completely stopped its business operations related to Afghanistan, Iran, North Korea, Sudan, South Sudan and Syria as well as Crimea and Sevastopol and the regions Donetsk, Kherson, Luhansk and Zaporizhzhia as part of a business policy decision.

In addition, there are individual business policy restrictions for certain business activities in connection with Belarus, Cuba, Russia and Venezuela.

Furthermore, Commerzbank does not accompany transactions involving certain persons, organisations or institutions relevant to sanctions.

For more details or questions, please contact your relationship manager.