

## Particulars

### About Your Organisation

#### 1.1 Name of your organisation

Commerzbank AG

#### 1.2 What is/are the primary activity(ies) or product(s) of your organisation?

- ☐ Palm Oil Grower
- ☐ Processor and/or Trader
- ☐ Consumer Goods Manufacturer
- ☐ Retailer
- ☒ Bank and/or Investor
- ☐ Social and/or Development NGO
- ☐ Environmental and/or Conservation NGO
- ☐ Affiliate

#### 1.3 Membership number

5-0017-14-000-00

#### 1.4 Membership category

Banks and Investors

#### 1.5 Membership sector

Ordinary

## Bank & Investors

### 1. Operational Profile

**1.1 Please state your company's main activity(ies) within palm oil-related financing. Please select all applicable option(s).**

- ☒ Corporate / Commercial Banking
- ☒ Trade Finance
- ☐ Private Banking
- ☐ Investment / Equity
- ☒ Debt / Capital Market
- ☐ Other

Other

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### 2. Operations in Palm Oil

**2.1 What types of financial services does your company provide to the palm oil industry?**

- ☒ Trade Solutions
- ☒ Lending/Loans
- ☐ Leasing
- ☐ Treasury Products
- ☐ Cash Management Products
- ☐ Investments
- ☐ Insurance
- ☐ Other

Other

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**2.2 For your company's palm oil-related activities, which geographic region(s) do you operate in?**

- ☐ Worldwide
- ☐ Africa
- ☐ Europe
- ☐ North America
- ☐ South America
- ☐ Middle East
- ☐ China
- ☐ India
- ☒ Indonesia
- ☒ Malaysia
- ☐ Oceania
- ☒ Rest of Asia

### 3. Palm Oil Policy and Progress

#### 3.1 Does your company have a lending or investment policy on palm oil?

Yes

#### 3.2 Which supply chain sectors does your palm oil policy cover?

- ☒ Growers
- ☒ Traders
- ☒ Processors
- ☐ Consumer Goods Manufacturers
- ☐ Retailers
- ☐ Others

Others

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#### 3.3 Does your policy on palm oil make a specific reference to RSPO-certified sustainable palm oil and oil palm products, and/or RSPO certification?

Yes

#### 3.4 Does your company have a policy that requires all your palm oil clients to be RSPO members?

Yes

#### 3.5 Does your company require your clients to have a public TimeBound Plan for 100% RSPO certification or uptake?

Yes

#### 3.6 When do you expect to require all your Grower clients to be RSPO certified?

2020

#### 3.7 When do you expect to require your clients in all other sectors to be RSPO certified?

2020.0

#### 3.8 Which regions do the above commitments cover?

- ☒ Worldwide
- ☐ Africa
- ☐ Europe
- ☐ North America
- ☐ South America
- ☐ Middle East
- ☐ China
- ☐ India
- ☐ Indonesia
- ☐ Malaysia
- ☐ Oceania
- ☐ Rest of Asia

**3.9 What measures do you take if a client is not meeting the requirements of your policy on palm oil?**

Palm oil suppliers which are accompanied by Commerzbank have to meet the following criteria: 1. The supplier has to be a member of the RSPO. 2. Additional information on how the palm oil supplier is already implementing sustainability criteria in its supply chain and what goals the company in this respect wants to achieve (e.g. certification) is also required. 3. The Reputational Risk Management department conducts an individual ESG-assessment.

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**3.10 Do you proactively engage with your clients to support and join the RSPO?**

Yes

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**3.11 Did members of your company participate in RSPO working groups and/or taskforces during the reporting period?**

No

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**3.12 Does your company have any collaborations with public or private sector palm oil industry players to support them in their efforts to increase the production or consumption of certified sustainable palm oil (CSPO)?**

Yes

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**3.13 What other activities have your company undertaken to promote RSPO-certified sustainable palm oil and oil palm products during the reporting period?**

Commerzbank collaborated on various activities (e.g. panel discussions) and articles concerning sustainable trade and procurement.

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#### 4. Actions for Next Reporting Period

##### 4.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

We continue to apply our criteria and the RSPO certification schemes as the minimum acceptable standards for our clients. We participate in the Financial Institutions Task Force, placed under the umbrella of RSPO. By doing so, we intend to contribute to a sustainable development of the palm oil sector as well as to have a positive impact on the support of sustainable production. As a member of the RSPO we commit, among others, to more transparency, long-term orientated economic activities and responsible dealing with the environment, natural resources as well as affected individuals and communities in the palm oil market

## 5. Shared Responsibility

*The Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO) approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to <https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules> or email the ACOP team at [acop@rspo.org](mailto:acop@rspo.org)*

### Labour & Labour Rights

#### 5.1 Does your company have a publicly-available policy covering Labour & Labour Rights?

Yes

##### 5.1.1 Does the policy cover:

- ☒ No discrimination
- ☒ Wage and working conditions
- ☒ Freedom of association
- ☒ No child labour
- ☒ No harassment
- ☒ No forced or trafficked labour

#### 5.1.2 Has your company previously uploaded or linked its Labour & Labour Rights policy in previous ACOP reporting cycles?

Yes

### Ethical Conduct & Human Rights

#### 5.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?

Yes

##### 5.2.1 Does the policy cover:

- ☒ Recruitment
- ☒ Contractors
- ☐ Sub-Contractors & Third-Party Contractors

#### 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACOP reporting cycles?

Yes

### Land Use

#### 5.3 Does your company have a publicly-available Policy covering Land Use?

No

**Occupational Health & Safety****5.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?**

Yes

**5.4.1 Has your company previously uploaded or linked its Occupational Health & Safety policy in previous ACOP reporting cycles?**

Yes

**Climate Change & Greenhouse Gas (GHG)****5.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?**

Yes

**5.5.1 Does the policy cover:**

- ☒ Identification and assessment of GHG
- ☒ Public reporting of GHG footprint
- ☒ Monitored implementation plan to reduce or minimise GHG emissions

**5.5.2 Has your company previously uploaded or linked its Climate Change & Greenhouse Gas policy or report in previous ACOP reporting cycles?**

No

**Complaints & Grievances****5.6 Does your company have a Complaints & Grievances Mechanism?**

Yes

**5.6.1 Is your Complaints & Grievances mechanism in line with the RSPO's grievance mechanism? For details of the RSPO's grievance mechanism, please go to <https://askrspo.force.com/Complaint/s/>**

Yes

**Smallholders****5.7 Does your company support oil palm independent smallholder groups?**

No

**5.7.3 Do you have any future plans to support oil palm Independent Smallholders?**

No

**5.7.4 Please explain why you are not planning to support oil palm independent smallholders**

Because we as a bank are engaged in financial services and do not produce or trade palm oil ourselves nor do we offer banking products to small business clients in the relevant countries, as they are not part of our target client spectrum.

## 6. Challenges

### 6.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- ☐ Awareness of RSPO in the market
- ☐ Difficulties in the certification process
- ☐ Certification of smallholders
- ☐ Competition with non-RSPO members
- ☐ High costs in achieving or adhering to certification
- ☐ Human rights issues
- ☐ Insufficient demand for RSPO-certified palm oil
- ☐ Low usage of palm oil
- ☒ Reputation of palm oil in the market
- ☒ Reputation of RSPO in the market
- ☐ Supply issues
- ☐ Traceability issues
- ☐ No challenges faced
- ☐ Others

Others

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### 6.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- ☒ Engagement with business partners or consumers on the use of CSPO
- ☐ Engagement with government agencies
- ☒ Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- ☐ Promotion of physical CSPO
- ☐ Providing funding or support for CSPO development efforts
- ☐ Research & Development support
- ☒ Stakeholder engagement
- ☐ No actions taken
- ☒ Others

Others

We continue to apply our criteria and the RSPO certification schemes as the minimum acceptable standards for our clients. We also continue to sensitize both internal and external stakeholders in respect to sustainable palm oil, e. g. via workshops, panel discussions and presentations. We participate in the Financial Institutions Task Force, placed under the umbrella of RSPO. By doing so we intend to contribute to a sustainable development of the palm oil sector as well as to have a positive impact on the support of sustainable production. As a member of the RSPO we commit, among others, to more transparency, long-term orientated economic activities and responsible dealing with the environment, natural resources as well as affected individuals and communities in the palm oil market

### 6.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

[https://www.commerzbank.de/media/nachhaltigkeit/ii\\_positionen\\_richtlinien/Commerzbank\\_ES\\_Framework\\_EN\\_Final.PDF](https://www.commerzbank.de/media/nachhaltigkeit/ii_positionen_richtlinien/Commerzbank_ES_Framework_EN_Final.PDF)