

## Particulars

### About Your Organisation

#### 1.1 Name of your organization

Commerzbank AG

---

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

- ☐ Grower
  - ☐ Processor and/or Trader
  - ☐ Consumer Goods Manufacturer
  - ☐ Retailer and/or Wholesaler
  - ☒ Bank and/or Investor
  - ☐ Social and/or Development NGO
  - ☐ Environmental and/or Conservation NGO
  - ☐ Supply Chain Associate
  - ☐ Affiliate
- 

#### 1.3 Membership number

5-0017-14-000-00

---

#### 1.4 Membership category

Banks and Investors

---

#### 1.5 Membership sector

Ordinary

---

**Bank and/or Investor****1. Operational Profile**

**1.1 Please state your main activity(ies) within the palm oil supply chain. Please select the option(s) that apply to you**

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

---

**Other:**

---

**2. Operations in Palm Oil**

**2.1 What are the various types of financial services to the palm oil sector provided by your organisation?**

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

---

**Other:**

---

**2.2 What geographic region(s) do you operate in for the palm oil business?**

Indonesia, Malaysia, Rest of Asia

---

**3. Palm Oil Policy and Progress**

**3.1 Does your organisation have a lending or investment policy on palm oil?**

Yes

---

**3.2 Which sub-sectors does your palm oil policy cover?**

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

**3.2 Others**

-

**3.3 Does the policy on palm oil make specific reference to RSPO-certified sustainable palm oil and oil palm products and/or RSPO certification?**

Yes

**3.4 Do you have a policy that requires all your palm oil customers to be RSPO members?**

Yes

**3.5 Do you require your customers to have a public Time-Bound Plan\* for 100% RSPO certification?**

Yes

**3.6 When do you expect to require all your Grower customers to be RSPO certified?**

2020

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

2020

**3.8 In which regions do the above commitments cover?**

Worldwide

**3.9 What measures do you take if a customer 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 conducts an individual ESG-assessment.

This means: If one of these three criteria is violated Commerzbank cannot finance the transaction or engage in the business relationship.

**3.10 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**3.11 What other activities have you undertaken in the reporting year to promote RSPO-certified sustainable palm oil and oil palm products?**

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

---

**4. Actions for Next Reporting Period****4.1 Outline actions that will be taken in the coming year to promote RSPO-certified sustainable palm oil and oil palm products.**

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. Non-Disclosure**

**5.1 Information in the sections above are mandatory declarations in your ACOP. For confidentiality purposes, members may choose not to display data in Section 3 publicly; however, RSPO reserves the right to utilise the member's data on an aggregate basis for sectoral and total analysis. Please check this box if the member consents to have the data in Section 3 displayed publicly.**

Yes - Display Publicly

---

**6. Application of Principles & Criteria for all member sectors**

**6.1 Regarding your company's investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C. Select all relevant options.**

---

**6.1.A Water, land, energy and carbon footprints**

File: [Commerzbank\\_ES\\_Framework\\_EN\\_Final.pdf](#)

Link: --

---

**6.1.B Land use rights**

File: [Commerzbank\\_ES\\_Framework\\_EN\\_Final.pdf](#)

Link: --

---

**6.1.C Ethical conduct and human rights**

File: [Commerzbank\\_ES\\_Framework\\_EN\\_Final.pdf](#)

Link: --

---

**6.1.D Labour rights**

File: [Commerzbank\\_ES\\_Framework\\_EN\\_Final.pdf](#)

Link: --

---

**6.1.E Stakeholder engagement - Name**

File: [Commerzbank\\_ES\\_Framework\\_EN\\_Final.pdf](#)

Link: --

---

**6.1.F None of the above. Please explain why.**

-

---

**6.2 What best practice guidelines or information has your organisation provided in the past year to facilitate production and consumption of RSPO-certified sustainable palm oil and oil palm products? What languages are these guidelines available in?**

Commerzbank collaborated on various activities concerning sustainable trade and procurement (in German and English).

e.g. [https://www.commerzbank.de/en/nachhaltigkeit/markt\\_\\_\\_kunden/mittelstand/nachhaltiger\\_handel/nachhaltiger\\_handel.html](https://www.commerzbank.de/en/nachhaltigkeit/markt___kunden/mittelstand/nachhaltiger_handel/nachhaltiger_handel.html)

**7. Support for Oil Palm Smallholders****7.1 Are you currently supporting any oil palm Independent Smallholder groups?**

No

**7.2 If yes, how are you supporting them?**

-

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

No

**7.2.2 When do you plan to start your support for oil palm Independent Smallholders?**

-

**8. Challenges****8.1 What significant economic, social or environmental obstacles have you encountered in the production, procurement, use and/or promotion of CSPO and what efforts did you make to mitigate or resolve them?**

- ☒ 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
- ☐ Others

Other:

**8.2 In addition to the actions already reported in this ACOP, how has your organisation supported the vision of RSPO to transform the market for sustainable palm oil in other ways? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)**

- ☒ Engagement with business partners or consumers on the use of CSPO
  - ☐ Engagement with government agencies
  - ☐ Promotion of CSPO outside of RSPO venues eg trade workshops industry associations
  - ☐ Promotion of physical CSPO
  - ☐ Providing funding or support for CSPO development efforts
  - ☐ Research & Development support
  - ☒ Stakeholder engagement
  - ☐ Others
- 

**Other:**

---

**8.3 Please attach or add links to any other information from your organisation on your palm oil policies and activities (e.g.: sustainability reports, policies, other public information)**

[https://www.commerzbank.de/en/nachhaltigkeit/nachhaltigkeitsstandards/positionen\\_und\\_richtlinien/positionen\\_und\\_richtlinien.html](https://www.commerzbank.de/en/nachhaltigkeit/nachhaltigkeitsstandards/positionen_und_richtlinien/positionen_und_richtlinien.html)

---