



**Commerce
Bancshares, Inc.**

2024

Focusing on what matters most.
CORPORATE RESPONSIBILITY REPORT



Table of contents

Letter from our CEO	3
Invested in your success	4
Corporate overview	5
How we do business	6
Our commitment to our stakeholders	7
2024 Awards and recognition	8
2024 Highlights	9
Building strong communities	10
Supporting our customers	21
Helping our team members grow	29
Acting with integrity	41
Sustainable operations	52

Letter from our CEO



In 2024, Commerce continued to lead with purpose — serving as a responsible corporate citizen, grounded in the values that have guided us for nearly 160 years.

Our commitment to communities, customers and team members forms a strong foundation that enables us to navigate challenges and drive steady progress. Throughout the year, we channeled our resources and expertise to create meaningful impact across our organization and within the communities we serve — guided by our purpose of helping others focus on what matters most.

I am proud to share our latest Corporate Responsibility Report, which outlines the results of our continued efforts across the following areas: community engagement, customer-focused innovation, team member development, strong governance and environmental responsibility. This report reflects our ongoing commitment to continuous improvement and highlights the tangible progress we've made in several key areas.

- We supported our **communities** by expanding financial education programs and encouraging team member volunteerism through paid time off and nonprofit board service, reinforcing our position as a trusted financial partner.

- We enhanced our digital platforms to elevate the **customer** experience and improve operational efficiency, providing meaningful support during a year of economic uncertainty and shifting market conditions.
- We continued to invest in our **team members** by fostering a supportive environment and providing a comprehensive array of tools and resources to help them grow and develop their careers.
- We upheld **governance** policies and programs to ensure our actions and decisions reflect our core values and reinforce our long-standing commitment to doing the right thing.
- We made thoughtful decisions to mitigate our impact on the **environment** and supported sustainability initiatives where we live and work.

As we look ahead, we remain steadfast in our commitment to support our communities and to drive positive change. I am proud of what we've accomplished together and optimistic about the future.

A handwritten signature in black ink, appearing to read "John Kemper". The signature is fluid and cursive, written over a white background.

John Kemper
President and Chief Executive Officer
Commerce Bancshares, Inc.

ABOUT THIS REPORT

Each year we conduct a review of our corporate responsibility (CR) efforts and publish a report outlining the progress and results of our initiatives. The 2024 Corporate Responsibility Report builds upon Commerce Bancshares' 2024 Annual Report to shareholders and highlights our work in several key areas: community, customer and team member engagement; corporate governance and environmental sustainability. It includes data and metrics that help quantify the impact of our CR initiatives and guide future best practices. All data in this report is as of December 31, 2024, unless otherwise noted.

Invested in your success

About Us

Achieving financial well-being takes both opportunity and adaptability. That's why we're dedicated to providing the guidance and solutions our customers need to navigate life's financial challenges with confidence. For nearly 160 years, we've stood alongside individuals, businesses and communities, offering personalized support and innovative tools to help them reach their goals. Whether it's a family saving for the future, a business expanding its reach, or a community investing in its next chapter, we're committed to being a trusted partner at every step of their financial journey. By combining personal service with tailored resources, we support our customers with the flexibility and tools they need to strengthen their future financial plans.



CONSUMER BANKING

Commerce Bank's consumer banking segment serves more than 800,000 households through 140+ branches and 250+ ATM locations, and digital solutions in online and mobile banking. The bank's consumer services include checking, savings, installment loans, personal mortgages and debit and credit cards.



COMMERCIAL BANKING

Commerce Bank serves more than 12,000 businesses through its commercial banking and payments solutions. The bank's commercial services include corporate lending, merchant and commercial card products, payment and treasury solutions, leasing and international services, as well as business and government deposit, investment and cash management.



WEALTH MANAGEMENT

Commerce Trust, a division of Commerce Bank, provides financial and tax planning, investment portfolio management, trust administration, and private banking services to high-net-worth individuals and institutions. Commerce Family Office, an operating unit of Commerce Trust, provides financial and tax planning, investment consulting, trust administration, and private banking services to ultra-high net worth individuals. Commerce also offers investments and insurance through Commerce Financial Advisors, a division of Commerce Trust. Securities and advisory services from Commerce Financial Advisors are offered through LPL Financial (LPL), a registered investment advisor and broker-dealer (member FINRA/SIPC).

Corporate overview

Commerce Bancshares, Inc. (NASDAQ: CBSH) is a regional bank holding company offering a full line of banking loan and deposit services, including payments solutions, investment management and securities brokerage. Commerce Bank is a subsidiary of Commerce Bancshares, Inc., and leverages nearly 160 years of proven strength and experience to help individuals and businesses solve financial challenges. In addition to offering payments solutions across the U.S., Commerce Bank currently operates banking facilities across the Midwest, including

the St. Louis and Kansas City metropolitan areas, Springfield, Central Missouri, Central Illinois, Wichita, Tulsa, Oklahoma City and Denver. It also maintains commercial offices in Dallas, Houston, Cincinnati, Nashville, Des Moines, Indianapolis and Grand Rapids and wealth offices in Dallas, Houston and Naples. Commerce delivers high-touch service and sophisticated financial solutions at regional branches, commercial and wealth offices — as well as through innovative digital solutions.



TOTAL ASSETS

Ranked 42nd among U.S. banks¹



MARKET CAPITALIZATION

Ranked 21st among U.S. banks¹



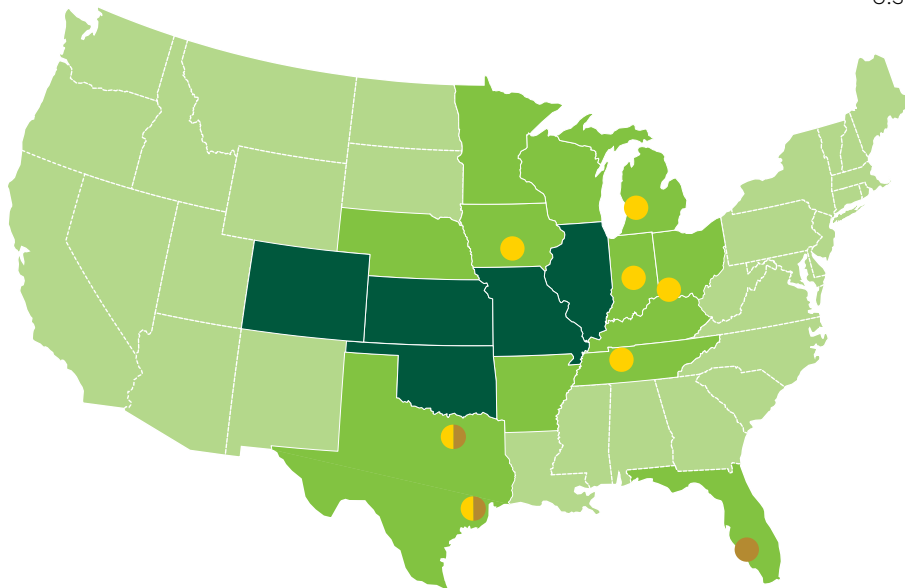
RETURN ON AVERAGE COMMON EQUITY YTD

Ranked 2nd among U.S. banks¹



TRUST ASSETS UNDER MANAGEMENT

Ranked 19th among U.S. banks²



- \$17.2** billion in total loans
- \$25.3** billion in total deposits
- a2** baseline credit assessment³
- 142** branches
- 253** ATMs
- 4,693** full-time equivalent employees

CORE BANKING FOOTPRINT

Commercial, Consumer, Wealth Management

- | | |
|------------------|---------------|
| St. Louis | Wichita |
| Kansas City | Tulsa |
| Springfield | Oklahoma City |
| Central Missouri | Denver |
| Central Illinois | |

COMMERCIAL & WEALTH OFFICES

- | | |
|------------|----------------------|
| Cincinnati | Indianapolis |
| Nashville | Grand Rapids |
| Dallas | Houston ⁴ |
| Des Moines | Naples ⁴ |

COMMERCIAL PAYMENTS SERVICES

Offered in 48 states across the U.S.

EXTENDED MARKET AREA

Sources: S&P Global Market Intelligence, and company reports and filings as of December 31, 2024.

1. Based on the top 50 publicly traded U.S. banks by total assets, as of December 31, 2024.
2. Regulated U.S. depositories, which includes commercial banks, bank holding companies and credit unions, as of September 30, 2024.
3. Commerce is two ratings above the U.S. banking industry median rating of baa1, "Moody's Sector Profile: Banks," October 30, 2024.
4. Locations outside the core banking footprint that accept deposits.

How we do business

Mission Statement

We take the time to understand our customers' financial challenges and accept them as our own. We do this by getting to know our customers and providing sophisticated advice along with capital and industry-leading solutions personalized for them.

Purpose

We help our customers focus on what matters most. Nearly 160 years of working with our customers has taught us that life is complex, and the best moments in life come with financial challenges. We help our customers plan for the big stuff as well as handle life's surprises — so they can get back to what matters most. Challenge Accepted.®

Our Values

- **Take a long-term view:** At Commerce, we look beyond short-term gain and invest in our people, products and technology for the long-term.
- **We collaborate as one team:** We celebrate our colleagues' diverse talents and perspectives and use them to make us stronger.
- **We act with integrity:** We are committed to doing what's right, not just what's most profitable. We adhere to high standards of governance and ethics.
- **We are customer-focused:** We build long-term, valuable relationships with our customers.
- **We strive for excellence:** We continuously measure and improve our performance.

Our Promise to Our Stakeholders

We're a bank you can trust to do the right thing for our customers, our team members, our shareholders and the communities we serve.



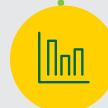
CUSTOMERS

We will invest the time to understand your needs, aspirations and challenges. With our knowledge and experience, we will offer personalized solutions, fresh ideas and innovative technology.



TEAM MEMBERS

We will remain true to our core values as we foster a culture our team will be proud of, and a workplace where teammates feel they belong. We will invest in our team, and the communities where they live.



SHAREHOLDERS

We will take a long-term view to build a socially responsible franchise that will deliver superior risk-adjusted returns throughout the economic cycle.

Our commitment to our stakeholders

At Commerce, we believe our success is defined not only by our ability to help people meet their financial challenges, but also by the mark we leave on the world at large. As a socially responsible corporate citizen, we continuously seek opportunities to make a difference. We're committed to furthering initiatives that serve our customers, strengthen our communities, and support a healthy environment. Our work in these areas is guided by our mission, our purpose and our values.

Stakeholder engagement

We maintain an array of channels to continuously engage our stakeholders, including our customers, team members, community members and investors. We believe it is important to continually gather their feedback, which helps inform our business practices and approach to key issues related to our business, industry and communities.

HELPFUL LINKS:

- [Annual Report](#)
- [Proxy](#)
- [Corporate Responsibility](#)
- [CRA Public File](#)
- [Culture at Commerce](#)
- [Corporate Governance](#)
- [Code of Ethics](#)
- [Security Overview](#)
- [Privacy Statement](#)

For more information, visit commercebank.com/about-us.



2024 Awards and recognition



Newsweek's
AMERICA'S BEST REGIONAL BANKS



Bank Director
RANKINGBANKING TOP 25 U.S. BANKS



S&P Global Market Intelligence
TOP 50 PUBLIC BANKS



Forbes
AMERICA'S BEST MIDSIZE EMPLOYERS
7 consecutive years



Forbes
AMERICA'S BEST EMPLOYER BY STATE: MISSOURI



U.S. News & World Report
BEST COMPANIES TO WORK FOR
2 consecutive years



Newsweek's
AMERICA'S GREATEST WORKPLACES FOR PARENTS AND FAMILIES
2 consecutive years



Center for Disability Inclusion's
SEAL OF ACCOMPLISHMENT FOR LEADER IN DISABILITY INCLUSION
2 consecutive years



Community Reinvestment Act
OUTSTANDING RATING
29 consecutive years

2024 Highlights



\$2.0 MILLION
in philanthropic investment
by Commerce Bancshares
Foundation



520+ NONPROFIT ORGANIZATIONS
supported by Commerce
team members serving in
leadership roles



\$1.4 BILLION
in community
development lending



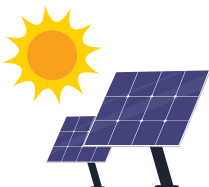
89%
Customer Relationship Score



100%
Team Members completed
required Code of Ethics
Training in 2024

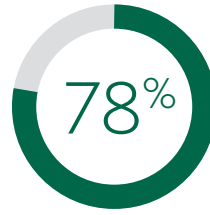


450+ METRIC TONS
of paper shredded
and recycled

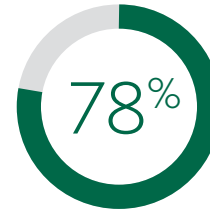


740,000+ kWhs
of clean energy produced
from solar panels at
branches and solar farm

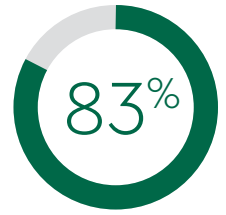
TEAM MEMBER SURVEY RESULTS



Engagement

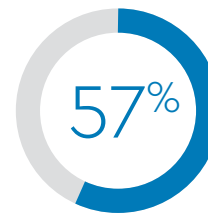


Enablement

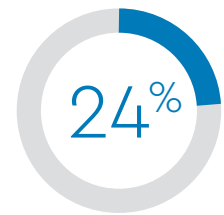


Sense of
Belonging

TEAM MEMBER DEMOGRAPHICS



Women



People of Color

6 EMPLOYEE-LED RESOURCE GROUPS



EMERGE



RISE



ENABLE



PRIDE



SALUTE



VIBE



of employees belong
to at least one ERG

BUILDING STRONG COMMUNITIES



Together, we make a difference

At the heart of every thriving community lies the power of neighbors helping neighbors. Through meaningful partnerships and innovative programs, we're helping shape stronger, more resilient communities and neighborhoods. Our team members are the driving force behind this vision, sharing their time, skills and knowledge to make a difference — whether by volunteering for charitable organizations, mentoring individuals to enhance their financial skills, or supporting causes that create lasting impact. Through our philanthropic investments, we help sustainable organizations making meaningful differences in the communities where we work and live. This commitment runs deeper than corporate responsibility — it's about building resilient communities where everyone has the opportunity to succeed. By combining our professional talents with heartfelt dedication to service, we're helping to create positive change in the places we're proud to call home.

Strengthening communities through philanthropy

Each year, we reinvest in our hometowns by supporting meaningful philanthropic and service initiatives. Across the markets we serve, we empower our local leaders to align our support with the unique needs of each community. From sponsoring local events to awarding grants through the Commerce Bancshares Foundation, our contributions take many forms. Through our strong partnerships, we gain deeper insight into the challenges faced by nonprofits and individuals, allowing us to make a greater impact. By sharing resources, knowledge and time, we help create opportunities for growth, ensuring our communities continue to thrive.

In 2024, the Commerce Bancshares Foundation contributed \$2,034,526 through 645 grant payments to our community nonprofit partners.



PHILANTHROPIC INVESTMENT BY COMMERCE BANCSHARES FOUNDATION



In 2024, the Commerce Bancshares Foundation proudly supported several organizations dedicated to enriching our communities:

GREATER KANSAS CITY HISPANIC COLLABORATIVE (GKCHC)

Founded in 1993, the GKCHC provides comprehensive assistance for the growth and professional advancement of Hispanics and other minorities in the Greater Kansas City area. Through programs like Young Latino Professionals and Latinos of Tomorrow, they offer mentorship and educational support. In 2024, the Foundation provided scholarships to eight local Latino small business owners, enabling them to attend the 45th annual United States Hispanic Chamber of Commerce (USHCC) National Conference in Kansas City. Attendees engaged in policy-driven discussions, networking, mentoring, educational workshops and advocacy training, all aimed at fostering Hispanic economic development and facilitating strategic business partnerships.

KANSAS CITY COMMUNITY LAND TRUST

This organization focuses on creating perpetually affordable housing for low-to-moderate-income individuals in the Marlborough neighborhood of Kansas City. By acquiring and rehabilitating properties, they ensure long-term affordability and community revitalization. The Foundation provided general operating support to further their mission.

UNITYPOINT HEALTH — DES MOINES FOUNDATION

Dedicated to improving health-care services in the Des Moines area, UnityPoint supports various health initiatives and programs. The Foundation sponsored their annual Festival of Trees and Lights, a fundraising event benefiting pediatric patients and their families.

COMMUNITY RESOURCE CENTER — NASHVILLE

Serving the Nashville area, this center provides essential resources and support to individuals and families in need. Their All in for Hygiene program focuses on distributing hygiene products to those lacking access. The Foundation's support helped expand this vital initiative.

HANDI-SHOP — MEXICO, MISSOURI

Handi-Shop offers employment and training opportunities for individuals with disabilities. Through their Partners for a Better Tomorrow Community Campaign, they aim to enhance facilities and programs. The Foundation's contribution bolstered this campaign, promoting inclusivity and empowerment.

Supporting educational and developmental opportunities

To help individuals enhance their quality of life, we fund various programs throughout our footprint that provide educational and developmental opportunities. Below are examples of our support:

- **UMKC Bloch School Banking Program** received support for the Banking Leaders of Tomorrow scholarship program. This initiative awards \$10,000 scholarships over four years to first generation college students pursuing careers in banking and finance.
- **Cincinnati State Technical and Community College Foundation** received support for its comprehensive CState Accelerate program, which provides participants with financial assistance and educational guidance.
- **Peoria Promise Foundation** received support in the form of sponsorship of a student. This tuition reimbursement program encourages economic development in Peoria, Illinois, by increasing the number of local high school graduates who complete college or vocational programs.
- **Hutchinson Community College** received support for multiple scholarship awards.
- **Central Institute for the Deaf** received support for general operations.
- **Springfield Center for Dyslexia and Learning** received support for general operations and holiday activities.

Through these partnerships, the Commerce Bancshares Foundation demonstrates its dedication to fostering vibrant and supportive communities.

Community Reinvestment Act

The Community Reinvestment Act (CRA), enacted in 1977, requires federal banking regulators to encourage financial institutions to help meet the credit needs of the communities in which they do business, including low- and moderate-income (LMI) neighborhoods. Through our ongoing dedication to compliance with the CRA, we invest in affordable housing, community services, neighborhood revitalization and economic development, helping to build thriving and sustainable communities. For 29 years, Commerce has achieved an Outstanding CRA rating, reflecting our unwavering commitment to community development. Community development efforts also boost customer loyalty, team member morale and brand recognition. Ultimately, we regard community reinvestment as a critical component of our corporate responsibility and a strategic approach to business, benefitting both our company and the community.

Empowering communities through dedicated outreach

At the heart of Commerce's community impact are three specialized teams working in concert to create lasting change: **Community Development Officers (CDOs)**, **Community Outreach and Banking Officers (COBOs)** and **Community Home Loan Originators (CHLOs)**.



CDOs

Community Development Officers



COBOs

Community Outreach and Banking Officers



CHLOs

Community Home Loan Originators

CDOs serve as strategic architects, building bridges between Commerce Bank and local communities. They seek out and nurture partnerships with nonprofits, schools, churches and municipal organizations that serve low-to-moderate-income areas. By identifying opportunities where banking services can make a meaningful difference, CDOs help ensure Commerce's resources reach those who need them most.

Working alongside CDOs, **COBOs** act as ambassadors for financial literacy in our communities. Their deep connections within local neighborhoods allow them to understand unique challenges and opportunities firsthand. Whether organizing financial education workshops, participating in community events, or advocating for specific programs, COBOs translate community needs into actionable solutions.

The path to homeownership becomes clearer through the dedicated work of **CHLOs**, who guide first-time homebuyers through Commerce's Neighborhood Connection® loan programs. These specialists invest significant time in preparing clients for homeownership, offering personalized education and support throughout

the mortgage process. CHLOs serve as the voice of their community, providing valuable insights that help shape and improve these programs. Their work extends across multiple markets including Kansas City, St. Louis, Tulsa, Denver and Houston.

These three teams exemplify Commerce's hands-on approach to community development. They are building partnerships that strengthen communities and create pathways to financial success.

Helping people make the most of opportunities

At Commerce, we are committed to increasing financial inclusion, removing barriers, and increasing economic opportunity in communities that are underserved or have limited or no access to the mainstream financial system. We accomplish this by developing relationships in the community to establish thoughtful financial empowerment programs for students, adults and small business owners.

Throughout the year, our CDOs in Kansas City and St. Louis proactively look for opportunities to engage with our communities. Through this engagement process, the need for financial education frequently emerges.

In 2024, Commerce's COBOs focused on expanding financial education and accessibility across communities. The team launched a revitalized **Financial Education Series** in February, delivering practical instruction in budgeting, credit management, retirement planning and debt management through hands-on learning experiences.

The program's reach extended through strategic partnerships across the region. The **Urban League of Metropolitan St. Louis** integrated financial education into their Entrepreneurship and Women's Business Center offerings and the **University of Missouri-Kansas City** hosted the Bankers of Tomorrow initiative, connecting students with mentorship opportunities in banking.

COBOs' tailored approach served several groups including youth, entrepreneurs, immigrant communities and underbanked populations. Hundreds of participants engaged with the programs, leading to new account openings and improved financial management practices.

The following 2024 COBO strategic partnerships have been instrumental in empowering individuals with the knowledge and tools necessary for financial independence:

- **Drumm Farm (Kansas City):** An example of Commerce's commitment to fostering community growth and empowerment is its collaboration with Drumm Farm, an organization devoted to the lifelong success of children, young adults and families navigating the challenges of foster care and homelessness. Commerce led a tailored five-week financial education program specifically designed to equip these young adults with the necessary tools for financial independence.
- **Dream Builders 4 Equity (St. Louis):** Commerce partnered with Dream Builders 4 Equity to support their program for 50 underserved youth, equipping them with essential financial knowledge and skills. Students participated in hands-on lessons covering budgeting, banking and financial planning. The program included a campus tour of St. Louis University and culminated in a budget competition, where participants managed a \$2,000 budget to showcase their financial decision-making skills.
- **Core Collective at St. Vincent (St. Louis):** Commerce facilitated a six-week financial literacy program for foster youth, which included practical banking experience, job shadowing and etiquette classes. Since 2022, Commerce has provided financial education to youth in the Core Collective at St. Vincent transitional living program. Through this course, young adults ages 16 to 22 gain essential skills to navigate their personal finances and prepare for independent living.
- **Kansas City, Missouri Public Schools Wrap-Up Event:** A comprehensive, full-day seminar on banking and business education was organized, impacting over 30 students and providing them with valuable financial insights.
- **The JReid InDeed Foundation**, established by former Kansas City Chiefs safety Justin Reid, empowers underserved communities through initiatives like the Tackling Tech program — a two-week computer science camp for high school students. In 2024, Commerce participated in this program by providing financial education workshops, ensuring participants gained both technical and essential money management skills.
- Commerce, in partnership with the **Urban League of Metropolitan St. Louis** and **Legal Services of Eastern Missouri**, provided a financial education session focused on helping low-to-moderate-income (LMI) individuals protect and sustain generational wealth. The session equipped participants with practical knowledge on wills, estate planning, and trusts — essential tools for safeguarding assets and minimizing financial risk.



Building bright financial futures

Understanding your finances from an early age sets the stage for a secure future. Having the right financial knowledge and know-how to manage your money makes all the difference when chasing your dreams and gaining financial freedom. At Commerce, we're committed to providing young adults and business owners with the guidance and tools they need to take control of their finances and build a bright future.

BANKING BASICS FOR TODAY'S STUDENTS LEADING TO TOMORROW'S SAVERS

For the fourth consecutive year, Commerce has expanded its innovative financial education initiative across various school districts. Through this program, Commerce professionals engage directly with students in their classrooms, delivering foundational lessons on banking basics and personal finances.

By facilitating discussions in small groups, the program works to clarify financial concepts, debunk myths about banking, and encourage confidence in managing personal finances among students. This effort lays the groundwork for a future generation that is knowledgeable about and confident with the banking system.

SAAB — A GRASSROOTS MENTORING PROGRAM FOR ALL

Commerce team members in Springfield, Missouri, launched a mentoring relationship with SAAB that proved so successful it was expanded to St. Louis this past year. SAAB's mission encompasses providing mentorship, academic support, leadership training and community service opportunities while preparing individuals for personal and professional success. Within this framework, Commerce mentors have played a pivotal role, offering guidance on financial education and banking career pathways, and giving mentees a glimpse into the practical workings of the banking sector.

Advancing women's career skills through community support

Commerce is committed to expanding economic opportunities in the communities we serve. Since 2019, we've partnered with Rung for Women, a St. Louis-based nonprofit dedicated to helping women hone business and networking skills to achieve career and financial growth.

Unlike traditional job placement programs, Rung's career accelerator model focuses on long-term career growth and financial stability. Through a six-month Career Foundations program, women receive career coaching, financial education, wellness services, and access to a professional network designed to support their advancement. Members continue to receive guidance after completing the program, fostering a lifelong community of support.

Commerce team members have played an active role in shaping Rung's programming. Senior leaders helped develop an eight-week Professional Power Skills curriculum covering executive presence, communication, and relationship-building. Commerce team members also lead personal branding and networking sessions, while our RISE employee-led resource group collaborates on workshops, mentoring and career-building events.

“ Commerce has taken a really hands-on approach to helping us solve this issue on a local level. The knowledge they've shared is now imprinted on our program, helping women gain the skills and confidence to succeed. ”

— LESLIE GILL, PRESIDENT OF RUNG FOR WOMEN

By investing in women's career development, Rung is inspiring individuals to reach their fullest potential and Commerce is proud to support its mission.

Partnering to support business development

Commerce is actively engaged in the growth and support of business development through its work with the Kansas City Credit Enhancement Fund (KCCEF) program. The KCCEF program supports eligible entrepreneurs and small businesses in under-banked, low-to-moderate-income neighborhoods. The needs of entrepreneurs starting new businesses can vary widely, from acquiring new equipment and securing working capital to purchasing real estate. Through the KCCEF program, Commerce offers lending solutions and financial education tailored to support the growth and success of businesses in vital neighborhoods.

Community Reinvestment



HOME MORTGAGE LENDING

\$191.12 million loans to LMI borrowers, LMI geographies, minority borrowers and/or majority-minority geographies



SMALL BUSINESS LENDING

\$206.28 million lending to small businesses with revenues less than \$1 million



COMMUNITY DEVELOPMENT LENDING

\$1.39 billion in community development lending (CDL), supporting affordable housing development and small business growth and lending to nonprofits that support LMI communities

Helping first-time homebuyers achieve homeownership

We continue to strengthen our commitment to affordable and sustainable homeownership through Commerce's Neighborhood Connection® mortgage loan program, expanding into new markets and offering financial assistance for first-time buyers. In 2024, we introduced the program in Tulsa, recognizing a growing need for accessible home financing in the community.

Since its inception, Neighborhood Connection® has funded 1,128 loans, with 797 of those going to first-time homebuyers — underscoring Commerce's dedication to helping individuals and families achieve the dream of homeownership. To date, Commerce has originated \$134.6 million in Neighborhood Connection® loans and awarded \$2.3 million in down payment assistance grants to support borrowers. Commerce's \$5,000 down payment assistance grants remain a critical part of the initiative, helping buyers overcome financial barriers to homeownership.

THE IMPACT OF NEIGHBORHOOD CONNECTION® LOANS

First-time homebuyers: **797**
 Loans originated: **\$134.6 million**
 Grants: **\$2.3 million**



A key driver behind this success is the Community Home Loan Originator (CHLO) program, which is designed to provide hands-on, personalized guidance to first-time homebuyers. CHLOs play an instrumental role in providing feedback for continuous program improvement, ensuring that product guidelines and grant offerings align with real community needs.

Commerce also introduced a dedicated servicing representative to act as the main contact for Neighborhood Connection® borrowers, ensuring borrowers have accessible, reliable assistance for any payment- or service-related inquiries. Additionally, these homebuyers receive dedicated support post-closing to ensure successful homeownership.

As the Neighborhood Connection® mortgage program continues to evolve, the focus remains on expanding financial accessibility, financial knowledge and skills, and strengthening community partnerships — helping even more first-time buyers turn their homeownership dreams into reality.



Average customer satisfaction score for CHLOs

Commerce was honored to participate in HUD's **Let's Make Home the Goal** event in Kansas City, an initiative aimed at increasing homeownership among low-to-moderate-income (LMI) and minority families. Drawing approximately 200 attendees, the event was led by Credit & Homeownership Empowerment Services, Inc. (CHES, Inc.), a nonprofit organization dedicated to empowering low-to-moderate-income individuals and families throughout their home ownership journey. As one of only three banks invited to partner with CHES, Inc., we showcased our Neighborhood Connection® mortgage product — designed to support first-time and LMI homebuyers — while also providing homebuyer education and financial literacy resources. Our team engaged directly with prospective homeowners, offering guidance on banking essentials and pathways to homeownership. HUD officials recognized the strength of our Neighborhood Connection® program, reinforcing our commitment to making homeownership more accessible and achievable in the communities we serve.



EXPANDING AFFORDABLE HOUSING THROUGH INVESTMENTS

For over three decades, Commerce has proudly invested in equity funds supporting the development of affordable housing across the Midwest, including significant contributions to initiatives in both Kansas City and St. Louis. These funds are dedicated to leveraging corporate investment and maximizing tax incentives to create LMI housing solutions. Our goal is to provide greater access to affordable housing in the Midwest through effective public-private collaboration and exceptional asset management.

Stepping forward and making a difference in our community

For us, volunteering is about consistently stepping forward as committed participants in our communities. The Commerce team is always on the lookout for dynamic ways to uplift our neighborhoods. Every year, we encourage our team members to make the most of their paid Volunteer Day Off by choosing to help a local organization that matters to them. Additionally, many Commerce leaders champion community causes by serving on the boards of nonprofit organizations.

More than **36,000 hours** of paid volunteer time available for team members

More than **500 nonprofit organizations**

supported by team members in leadership roles, including board membership

Our team actively works to make a tangible difference in the communities we serve. Over the past year, Commerce team members have exemplified our commitment to community engagement through impactful volunteer efforts, including:

- **Food Bank of the Rockies** serves communities across Colorado and Wyoming, distributing food to hundreds of hunger relief programs. Throughout the past year, Commerce team members helped sort and pack food, assisted with distribution, and supported mobile pantry operations.
- Volunteering at **Simply Hygiene**, Commerce team members in Wichita contributed by unpacking bulk hygiene items and packaging them in the warehouse for distribution to local schools and nonprofits. These organizations can order items free of charge to support students and families in need. Simply Hygiene provides essential hygiene products to individuals and families lacking access, collaborating with 200 schools and 87 organizations in the greater Wichita area to promote health and dignity within the community.



- **Sky High for Kids** focuses on funding research and helping children battling pediatric cancer and other life-threatening conditions. Commerce team members in Houston supported their mission by helping at fundraising events, assisting with patient support programs, and participating in activities that brought joy to hospitalized children and their families.
- Commerce team members in St. Louis joined the **Clean Up Build Up** initiative this past year, working alongside the Regional Business Council and Urban League of Metropolitan St. Louis to revitalize neighborhoods in need. Through hands-on volunteer efforts such as clearing vacant lots, removing debris, and enhancing public spaces, Commerce team members contributed to creating safer, cleaner and more vibrant communities.
- Demonstrating a commitment to supporting military families, Commerce team members engaged in volunteer initiatives at **Fisher House** locations in Kansas City and St. Louis. The team organized a collection drive to help with fundraising, aimed at providing a comfortable home away from home for families of veterans and military personnel receiving medical care.

HELPING NEIGHBORS STAY SAFE AND WARM

Commerce proudly partnered with **Heat Up St. Louis** for the first time in 2024, supporting its mission to assist Missouri and Illinois households struggling with rising utility costs. As the organization's banking partner, Commerce made a multi-year commitment to donate \$25,000 and our team members joined hundreds of volunteers for the annual Hardee's Rise and Shine for Heat Up event, which raised \$980,000 to provide utility assistance to those in need in the St. Louis area.

More than 40 Commerce volunteers collected donations from Hardee's customers at the restaurant's locations across the region, while others made donations to purchase biscuit sandwiches and then delivered them to corporate clients to raise awareness of the cause.

“As a super-community bank, we believe Commerce is only as strong as the communities in which we live and work. This initiative aligns with our mission to assist our neighbors in overcoming financial barriers to meet their basic needs.”

— MOLLY HYLAND, DIRECTOR OF COMMUNITY RELATIONS, COMMERCE BANK – ST. LOUIS

This is just one example of the many volunteer opportunities in which Commerce team members enjoy participating because these opportunities help to strengthen our community.

CONNECTING FOR A CAUSE: COMMERCE VOLUNTEER FAIRS

The Commerce Volunteer Fairs in Kansas City and St. Louis are Commerce's way of connecting team members with local nonprofits that need volunteers as well as helping build stronger community ties. These annual events provide a range of volunteer opportunities, from one-off projects to ongoing commitments, and highlights easy ways for team collaboration.

Many organizations participated in Kansas City last year, including Junior Achievement of Greater Kansas City, City Union Mission, Lead to Read and KC Community Gardens. In addition to connecting attendees with meaningful volunteer work, the fair incorporated a charitable collection drive. To incentivize donations, attendees entered a raffle by bringing needed items.

Last year St. Louis area team members connected with causes ranging from environmental conservation with Forest ReLeaf to the support of international communities through the International Institute of St. Louis.

PAWS FOR A CAUSE: #DRIVEUPPUPS

Commerce's annual #DriveUpPups campaign, a favorite among both customers and team members, celebrated its fourth consecutive year in 2024.

Throughout the summer, customers visiting drive-thru locations across Kansas, Missouri and Oklahoma were invited to bring their canine companions for a special pet treat. Participants were encouraged to share photos of these lighthearted visits on Instagram, tagging @CommerceBank and using the hashtag #DriveUpPups. For each tagged photo, Commerce pledged a \$10 donation to local animal welfare organizations.

The campaign successfully reached its \$10,000 donation goal, supporting 11 organizations dedicated to improving animal safety and well-being:

- KC Pet Project
- Tower Grove Park
- Humane Society of Southwest Missouri
- Southeast Missouri Pets
- Central Missouri Humane Society
- Kansas Humane Society
- Friends of the Animal Shelter of St. Joseph
- Northeast Missouri Humane Society
- Tulsa SPCA
- Finney County Humane Society
- Riley County Humane Society

Adam Steven, executive vice president and director of retail banking at Commerce, expressed his enthusiasm for the initiative, stating, "Our bankers are passionate about giving back to our communities and are delighted when pups visit our branches."

The #DriveUpPups campaign not only encourages memorable interactions between customers and their pets, but also translates these moments into essential financial support for animals in need.



Enriching our communities by supporting local businesses

We are deeply committed to the communities where we live and work, and we believe our business practices should reflect our communities. By hiring local suppliers, we reinvest in our communities, strengthen the local economy, and contribute to a more dynamic and resilient business environment.

ADVANCING SUPPLIER ENGAGEMENT THROUGH CONNECTION AND TECHNOLOGY

We are continuously improving our processes at Commerce. For the fourth consecutive year, we participated in the Financial Services Roundtable for Sustainable Development (FSRSD) annual survey. The purpose and mission of the FSRSD is to promote inclusive supplier initiatives within the financial services industry. One way FSRSD fulfills its mission and supports member growth is through its annual benchmarking survey, which collects data on the inclusive procurement practices of member companies. The survey helps identify best practices and provides insights into the challenges and opportunities for participants. By leveraging the insights gleaned from the survey, we can improve our supplier engagement practices and drive meaningful change.

On our journey to create a more inclusive supplier program, we use a variety of tools to enhance our search for suppliers and build more inclusive business practices. In addition to using a data-driven approach to identify small, diverse, and sustainable suppliers that meet specific criteria, such as location, industry and certification, we've encouraged more local businesses to register on the supplier platform. With more than six million suppliers accessing the platform, local businesses increase both their visibility within the community and opportunities to grow their business.

Strengthening community bonds for lasting impact

Our core values and guiding principles are the driving force behind our achievements, particularly in our community engagement efforts. For 2025, we look forward to expanding upon the exceptional foundation established by our dedicated team members and community partners. Strengthening our community connections is essential for building trust, creating collaboration, and reaching our shared goals. We believe in finding practical ways to work together and forge community bonds, delivering impactful results for everyone.



SUPPORTING OUR CUSTOMERS



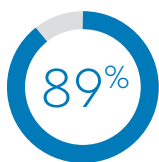
Navigating the path to financial well-being together

In today's dynamic financial landscape, Commerce is dedicated to supporting our customers by providing tools and solutions to assist with their financial well-being. Through a deep understanding of our customers' needs, paired with innovative products, trusted guidance, and strategic insights, we empower individuals, businesses and underserved communities to achieve lasting financial success.

In 2024, we enhanced experiences for personal banking customers with greater financial flexibility. For our business customers, we've invested in advanced payment solutions through CommercePayments®, streamlining finance processes with integrated data and automation tools. Additionally, we support underserved communities by providing financial education and identifying programs that facilitate homeownership and support business owners.

Throughout these efforts, our customers' best interests and security remained our top priority, guiding every decision and development.

Our dedication to providing practical solutions that address real customer needs resulted in a strong relationship score of 89% as of December 2024.



Customer Relationship score

Advancing our online banking services

Throughout 2024, Commerce enhanced our digital banking platforms to deliver more convenient and personalized experiences that give customers — both individuals and businesses — greater control over their finances. Our improvements include:

- **Upgraded online and mobile banking platforms** with 21 customer-facing releases, enhancing self-service capabilities to elevate the digital banking experience and improve user autonomy
- **Introduced automated savings tools**, including SmartSave and Round Up, to accelerate our customers' journeys toward financial success
- **Extended online account access to mortgage customers**, enabling them to view loan details, payment history and statements in one convenient location
- **Enabled principal-only payment capabilities via mobile banking**, providing more flexibility for customers managing their loan repayments
- **Simplified the account opening process**, allowing prospective customers to open accounts online or via mobile, with enhanced identity verification for better security
- **Maintained Zelle® services**, giving Commerce customers a fast, convenient way to send and receive money using only an email address or U.S. mobile phone number
- **Improved business credit card visibility** by enabling card administrators to view all cardholder transactions across both online and mobile banking. This enhancement eliminates the need to access multiple systems, streamlining reconciliation and saving time for busy business owners and administrators.

These advancements underscore Commerce's dedication to providing user-friendly digital solutions that empower all our customers to manage their finances with confidence, clarity and ease.

Opening doors to financial success

Making a positive difference in the lives of our customers and community is at the heart of what we do. We understand that financial challenges can sometimes keep dreams just out of reach. That's why we're actively working to break down those barriers — offering the guidance, tools and support necessary to help our community members and improve their quality of life.

ENHANCING LANGUAGE ACCESS IN BANKING

Expanding language support remains central to our efforts to make banking more accessible. Recognizing the importance of clear communication, we continue to ensure Spanish-speaking customers have access to financial resources. We offer enhanced Spanish-language services across key areas, including care centers and mortgage lending.

Our bilingual Community Mortgage Specialist continues to provide dedicated support throughout the home loan process, helping customers navigate applications, closings and servicing questions.

We utilize third-party evaluations to assess our team members' Spanish proficiency, ensuring they can effectively assist with both routine banking needs and complex financial discussions. This commitment to breaking down language barriers helps our customers feel understood and supported.

IMPROVING THE BORROWING EXPERIENCE

Last year, Commerce implemented a new loan origination system designed to enhance the borrowing experience for Commerce customers. The platform streamlines the application process, reduces paperwork, and enables faster decision-making — allowing customers to apply for loans more easily and move forward with their financial plans.

Automated communication keeps applicants informed throughout the process, while new product features and pricing capabilities provide more flexible lending solutions. Additionally, e-contracting has simplified loan closings, making the experience more efficient and user-friendly.



By offering this service, Commerce continues to improve the loan experience, ensuring a seamless and transparent process from application to closing.

HELPING BUILD FINANCIAL CREDIBILITY

A good credit score is essential for accessing credit, obtaining loans, renting an apartment, or even getting a job. Building a good credit score takes time and requires a history of on-time payments and responsible credit use.

The foundation of this journey often begins with establishing a checking account, which is frequently a prerequisite for applying for credit, loans and other financial products. By opening an account, customers are not just managing day-to-day finances — they're building a relationship with a financial institution and establishing themselves as responsible financial citizens.

Our Commerce **Free** Checking Account is a simple checking account with no monthly service fees for customers' everyday banking needs. It serves as the gateway to additional services our bank provides, positioning customers to reach future financial milestones. To learn more, visit our Neighborhood Banking Resource Center.

Another way to build financial credibility is to build credit. For individuals looking to strengthen their credit, we offer the Commerce Secured Credit Card account. This type of product can provide borrowers with a way to establish and improve their credit scores. By building a strong credit score, consumers can increase their financial options and improve their overall financial health.

Safeguarding your personal financial well-being

At Commerce, we prioritize the security of our customers' account and personal information. We provide innovative features and services designed to provide our customers with greater convenience, help manage their security and have control over their finances.

In 2024, we introduced the Texting for Check Fraud program, a proactive service that alerts customers to potentially suspicious check activities via text message, enabling prompt verification and preventing unauthorized transactions.

Our commitment to security is further demonstrated by our continuous investment in advanced tools and technologies designed to protect personal banking information.

As a general business practice, we do not ask for sensitive personal information by unsolicited email, unsolicited phone calls or text messages.

Learn more about the security practices we follow to protect your information on our Security Center at commercebank.com.

Saving made simple with My Savings Accelerator

In today's economic landscape, where saving for an emergency remains a widespread challenge, Commerce offers My Savings Accelerator. This innovative initiative addresses the critical need for tools that help individuals set aside funds effortlessly and achieve their financial goals with confidence. Studies reveal that a significant portion of the population struggles to save even \$500 for unforeseen expenses, a concern that My Savings Accelerator can help address directly.

My Savings Accelerator offers two key features — Round Up and SmartSave — to help transform everyday banking transactions into opportunities for savings. The Round Up feature encourages incremental saving by rounding up debit card purchases to the nearest dollar and depositing the difference in the customer's savings account.

Meanwhile, SmartSave leverages predictive technology to analyze spending patterns, identifying surplus funds that can be automatically transferred to savings, all while incorporating safeguards to maintain financial stability. Through these automated saving solutions, Commerce makes saving a seamless part of daily transactions while offering customers flexibility in managing their finances.

\$4.3MM

Total amount saved by customers while using My Savings Accelerator in 2024

Creating meaningful connections with customers

Customers continue to seek convenience and personalization when managing their finances, and our Commerce Bank CONNECT® app continues to do just that. In 2024, we expanded our secure smartphone messaging feature, allowing more customers to conveniently connect with our bankers directly through their mobile devices whenever it works best for their schedules. Customers engage with their banker of choice, who can provide personalized guidance to help them achieve their financial goals — whether that be advice on options, education on new solutions, or help with problem resolution.

The positive feedback we've received from our customers has been instrumental in enhancing the overall experience of the Commerce Bank CONNECT® app, as demonstrated by these reviews:

“ The app is easy to use and convenient. ”

“ Super helpful and convenient! Fantastic addition for Commerce. ”

“ I've used the Commerce Bank CONNECT® app numerous times with great results. It's an easy method for receiving quick, fantastic service and I appreciate what your bankers have done for me. ”

“ I checked the website and found info about this app. I quickly downloaded it to my phone. It was easy to understand and I had several bankers to choose from. Karegan was fantastic. I'll use this app in the future. ”

“ I love it when I can contact someone and receive customer service customized just for me. ”

Improving financial flexibility for customers

At Commerce, we understand the struggles that our customers sometimes face when managing their finances. To better serve them during life's unpredictable moments, we provide customers with access to their direct deposits up to two days early through **Early Pay**. Customers receive this benefit by simply setting up their direct deposit — no enrollment required.

We also offer additional flexibility with a grace period for overdrafts. This gives customers additional time to manage their accounts and rectify any potential overdraft situations.



Enabling instant payments for smarter business transactions

Commerce is helping businesses gain more control over their payments by leveraging the **Federal Reserve's FedNow® Service**, which enables instant transactions 24/7, 365 days a year. This real-time payment solution allows customers to receive funds instantly, helping them avoid late fees and optimize working capital by controlling payment timing. With FedNow, customers gain a faster, more predictable way to manage transactions, enhancing financial planning and operational agility. By eliminating traditional payment delays, businesses improve cash flow management, access funds faster, and streamline corporate payments.



Banking on your time with faster payments

During the past year, Commerce continued to provide cutting-edge payment solutions by participating in the Real Time Payments (RTP)® network from The Clearing House. This innovative payment rail ensures that customers can receive instant payments at any time, increasing convenience and accessibility. With hundreds of financial institutions now connected to the system, our involvement represents a significant step forward in our efforts to offer fast and efficient payment options to our customers.

Protecting business finances with advanced security tools

In 2024, Commerce enhanced its fraud prevention efforts with tools designed specifically to help businesses safeguard their financial operations. With accounts payable and receivable departments being among the most vulnerable areas for fraud, these solutions were built to reduce human error, detect suspicious activity — providing greater security and peace of mind.

Our **Positive Pay** and **Premium Positive Pay** services now offer even more robust monitoring of checks presented for payment, allowing businesses to quickly identify and address discrepancies. Reverse Positive Pay gives companies an added layer of oversight, strengthening fraud prevention. For electronic transactions, the enhanced ACH Risk Manager monitors processing of ACH payments, while CommercePayments® commercial card security includes updated spending controls and fraud-reducing protections. Additionally, real-time email alerts notify businesses of critical account activity, enabling swift action when needed.

With these innovations, Commerce continues to lead the way in helping businesses protect their financial assets and operate with confidence.

Flexible capital for business growth

Managing cash flow is a major challenge for small businesses, and Commerce is helping to make it easier through the **U.S. Small Business Administration's new 7(a) Working Capital Pilot program (WCP)**. As one of the first banks offering this program, Commerce provides eligible businesses with a flexible line of credit up to \$5 million, allowing them to borrow against accounts receivable and inventory. Since interest accrues only to funds in use, it's a cost-effective way to access capital for expenses and order fulfillment and invest in growth. The program supports businesses at various stages, whether they're building financial strength, scaling operations, or managing international receivables. It also provides access to standby letters of credit and performance bonds, helping businesses secure contracts and expand. By giving businesses more control over their working capital, Commerce is helping customers stay competitive, grow strategically, and capitalize on new opportunities.



Essentials for small business growth

Small business owners face unique financial challenges, and finding the right support can be daunting. Commerce responded to this need with the **Banking Essentials program**, an educational video series offering fundamental guidance to help small business owners learn how to manage the financial side of their business.

The program provides resources that support small business growth among people who don't use banks much or at all, providing a solid start in financial education and teaching them how to find the banking support they need. The videos break down complex banking concepts into visually engaging and easy-to-understand formats, covering everything from banking terms to how to apply for loans.

commercebank.com/neighborhoodbanking

Supporting financial health in the workplace

Commerce's **Workplace Banking** program marks a commitment to financial wellness, partnering with companies to enhance their employees' financial health.

At the heart of Workplace Banking is employer support and extended access for their employees to banking solutions, financial resources, education, and connection to our bankers. This approach emphasizes the importance of knowledge, planning, and connection with relevant solutions to solve customers' needs. Through the My Milestones by Commerce® digital platform, companies can customize and co-brand education resources to further promote trust and engagement. It's another example of Commerce's dedication to the financial wellness of individuals.

As Workplace Banking continues to grow, it has the potential to reshape employee benefits. Every employee who benefits from financial education contributes to a wider culture of smart financial choices and well-being. We are not only helping businesses offer valuable resources to their teams, but also promoting financial education within our communities.

Deepening customer connections with a consultative approach

Our role as a trusted advisor is central to all our relationships. It enables open communication, strong connections and effective collaboration and ensures we work together to achieve mutual goals — all while navigating financial challenges and opportunities with confidence.

At Commerce, we implement a consultative, client-centric approach, addressing every area of a customer's business to provide the most comprehensive support for overall financial health. By understanding the unique challenges and opportunities in each segment of their business, we can provide tailored advice and solutions, contributing to a customer's long-term success.

As business needs shift, or as we innovate and introduce new solutions, we're always ready to engage in additional discussions. Our analysis and discovery processes are not a one-off conversation; rather, they are a continuous dialogue.

Whether we're consulting with a new customer or a potential one, we try to understand their business from the inside out. This tailored approach establishes opportunities for our customers to create efficiencies, reduce operational costs, and mitigate fraud. By taking the time to analyze and appreciate the intricacies of a customer's business, we are better positioned to offer valuable insights and solutions that will help drive success.



Innovating payments solutions with PreferPay®

Resulting from a collaboration with our business customers, our PreferPay® program continues to deliver enhanced payment convenience for all recipients — regardless of whether they maintain a bank account. PreferPay® allows our business customers to quickly distribute funds to their customers in as little as 30 minutes. Recipients with bank accounts can choose to have their payment sent to their debit card or a deposit account, or by check. For customers without bank accounts, PreferPay® can quickly route electronic payments to a prepaid debit card.

Building on this foundation, we've significantly extended the capabilities of PreferPay® to serve a wide range of industries. Today, PreferPay® remains a versatile solution for business-to-consumer (or employee) payments, streamlining transactions in sectors like insurance, healthcare, government, property management and retail.

Many customers have shared stories of how PreferPay® has simplified their B2C payments process. By automating the lifecycle management of their payments, quicker funding is delivered and operational costs are reduced, both of which enhance client satisfaction — a necessity in today's competitive environment. To learn more, [visit our website](#).

PREFERPAY®

SYNDICATE LOAN

COMMERCEPAYMENTS® AP CARD

**COMMERCEPAYMENTS®
PREPAID EXPENSE CARDS**



Innovating smarter healthcare payment solutions with Paytient®

The financial burden of healthcare often forces people to postpone necessary treatments, leading to worsening health outcomes and higher costs down the line. Commerce has been working alongside Paytient to help alleviate this burden and expand access to flexible payment options. Paytient offers a unique solution through a no-fee, no-interest Visa® credit card, allowing employees to pay for healthcare services up front and repay the amount over time via payroll deductions. Commerce's banking experience has been instrumental in expanding Paytient's reach, allowing more consumers across the U.S. to benefit from flexible payment options.

Now, our collaboration has grown even stronger. By leveraging advanced technology from our [Integrated Receivables](#) solution set, Commerce is helping Paytient process various enrollment forms, streamlining access to their innovative payment solution. Through these enhancements, we are committed to addressing our customers' growing need for affordable and accessible healthcare solutions.



Designing portfolios aligned with client priorities

Commerce Trust recognizes that every client has a distinct set of goals, values and financial circumstances. That's why we offer the flexibility to design customized investment portfolios tailored to individual preferences. Whether clients are focused on specific industries, risk tolerance, personal values or long-term objectives, our team has the tools and experience to build strategies that reflect what matters most to them.

Driving future tech innovation with SixThirty Ventures

This past year, we've continued to strengthen our relationship with SixThirty Ventures, a St. Louis-based venture firm focused on supporting early-stage tech innovators. SixThirty's portfolio and pipeline span fintech, insurtech, digital health and cybersecurity, embracing startups from around the world. As an investor in SixThirty, we are helping to drive innovation in the financial industry and support ventures that can solve emerging challenges for our customers. Commerce provides mentoring and innovative collaboration with SixThirty company leaders. Our efforts help startups network with leading technology and financial services institutions.

Moving forward together

As our customers navigate the current economic landscape, we remain committed to working alongside them to overcome financial hurdles. Throughout 2025, we will continue to enhance, innovate and expand our digital features and financial services, ensuring our customers have access to the most effective solutions tailored to their needs.



HELPING OUR TEAM MEMBERS GROW



Empowering our people

Our team members are at the heart of everything we do. We provide the tools, resources and opportunities they need to grow both professionally and personally. Through a culture of inclusivity, engagement and continuous learning, we foster an environment where every team member can thrive. From career development and community-building activities to comprehensive benefits and robust training programs, we invest in our people — because their success drives ours.

Forbes names Commerce one of the best midsize employers

In 2024, *Forbes* named Commerce one of America's Best Midsize Employers for the seventh year in a row. The award, based on feedback from a survey asking respondents to rate their employer and if they would recommend them to others, is a testament to our team's dedication and the impactful work we do together. We take this recognition seriously as we continue our focus on retaining top talent and helping our team members develop and grow in their careers with us. It's particularly meaningful as the feedback from our team members validates an environment where they feel valued, supported and empowered to thrive.

Commerce recognized for honoring family first

For the second year in a row, Commerce has carved out a distinguished place on *Newsweek's* list of America's Greatest Workplaces for Parents and Families, earning an impressive 4-star rating. This prestigious recognition comes from a comprehensive survey conducted by *Newsweek* and the data analytics firm Plant-A Insights Group, which canvassed 113,000 working parents and identified the top 1,000 family-friendly companies. Drawing from a pool of 693,000 company reviews, team members provided insights and experiences surrounding corporate culture, working conditions and additional drivers of employee satisfaction. The recognition emphasizes the importance Commerce places on a healthy work-life balance, empowering team members to focus on what matters most.



Celebrating our people-first culture

The dedication, knowledge and passion of our team members fuel our ability to serve our customers and communities. That's why we were especially proud to be named to *U.S. News & World Report's* "Best Companies to Work For" lists in Overall, Banking, and the Midwest for 2024–2025. This recognition reflects our ongoing commitment to fostering an inclusive and supportive workplace where employees can grow, thrive and feel a strong sense of belonging.

U.S. News evaluated companies based on six key factors essential to employee well-being, including career opportunities and professional development, work-life balance and flexibility, and belongingness and esteem.

Creating a workplace that works for all

Inclusion is at the heart of Commerce's culture. We were honored to receive the Seal of Accomplishment as a Leader in Disability Inclusion from the Center for Disability Inclusion (CDI) for the second consecutive year. This recognition highlights organizations that lead the way in advancing disability inclusion through intentional workforce, workplace and marketplace initiatives.

The Seal of Accomplishment reflects our dedication to creating equitable opportunities and ensuring accessibility for all. Through our ongoing efforts, we continue to strengthen our commitment to inclusion — building a workplace where every individual can thrive and contribute to our shared success.

Achieving these recognitions reaffirms our commitment to continuously enhancing the team member experience — investing in meaningful benefits, professional development opportunities, and a culture that values every voice.

Total rewards for total well-being

At Commerce, the wellness of team members is a high priority, and our Total Rewards program reflects our commitment to their overall well-being. The benefits provided through this program are designed to make us a destination where top talent wants to build and grow their careers. Our Total Rewards strategy is focused on four main components: Physical Well-Being, Financial

Well-Being, Emotional & Social Well-Being and Career Development. We're committed to fully supporting the professional and personal growth of our team members. We conduct a Total Rewards survey annually to gauge satisfaction with our offerings. This is an opportunity to understand what our team members are looking for and what matters most to them. In our 2024 survey, team members reported 79% satisfaction with our Total Rewards program.

The Total Rewards program is deeply rooted in Commerce's core values. We want all team members to live healthy, balanced lives, with careers that are meaningful to them as well as access to resources that can help make life outside of work more fulfilling.



FINANCIAL WELL-BEING:

- Base salary and incentives (based on eligibility)
- 401(k) including company match (traditional and Roth)
- Financial and retirement education resources
- Flexible spending accounts and health savings accounts
- Employee, supplemental and dependent life insurance
- Long-term disability insurance
- Family and medical leave
- Healthcare concierge services
- Identity theft protection
- Adoption assistance
- One Commerce team referral program
- Commerce Perks discounts on goods and services
- Discounts on Commerce Bank and wealth management services
- Paytient health payment account



PHYSICAL WELL-BEING:

- Medical, dental & vision healthcare plans (team members must meet a minimum average hours per week)
- Critical illness, accident, & hospital indemnity insurance
- Long-term care insurance
- Paid medical leave
- Paid parental and childbirth recovery leave
- Flu shots
- Virtual support for diabetes management and musculoskeletal conditions
- Healthy Returns tools and programs for healthy living
- Family forming services



EMOTIONAL AND SOCIAL WELL-BEING:

- Paid vacation, sick and personal time off
- Vacation purchase program
- Paid holidays
- Paid parental leave
- Paid volunteer time off
- Flexible work schedules and hybrid work options
- Employee Assistance Program
- Commerce in the Community volunteering initiatives
- Care@Work premium memberships
- Employee-led Resource Groups



CAREER DEVELOPMENT:

- Education and tuition assistance
- Mentorship and job shadowing opportunities
- Leadership development programs
- Professional development resources
- Managing at Commerce program
- Guiding Others forums and best practice sharing
- Aspiring Managers program
- Ascend Career Acceleration program Developer Acceleration Program
- Internships
- Culture Champion team opportunities



Pay equity at Commerce Bank

Commerce is committed to paying our team members equitably for their contributions. We achieve this by considering pay equity in our processing of pay changes and in routine proactive pay reviews. In 2023, we conducted a pay equity review led by an independent compensation consulting firm to ensure the effectiveness of our internal efforts. When determining base pay, we consider a team member's experience, education and performance along with the geographic market rate for their current role. These analyses ensure Commerce compensates team members appropriately and offers competitive pay to attract and retain them.

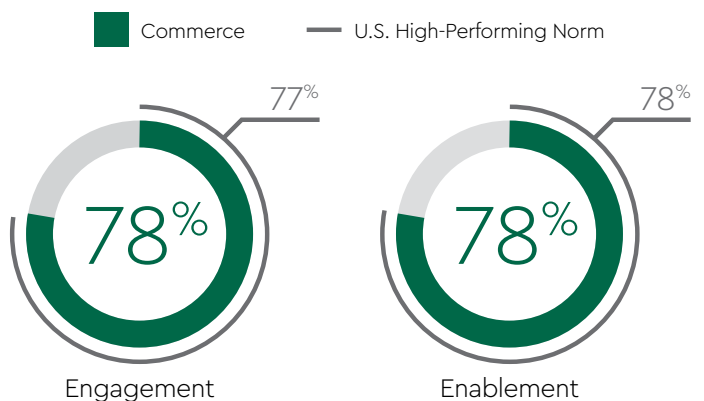
Engaging our team members

Commerce does not take its culture for granted. The work we do every day to build and maintain our strong culture is a source of pride. We understand Commerce thrives when our people do. With a solid foundation in place, we can focus on helping team members feel they belong at Commerce. We provide opportunities for people to grow and learn, connect with others, and build relationships with those around them.

We have an "always on" approach when it comes to feedback. Each year, we conduct a team member survey to gauge team members' sense of engagement, enablement and overall satisfaction with their employment at Commerce. According to Korn Ferry, our survey administrator, our engagement and enablement scores are at or above the high-performing company norm. Our consistently strong scores support our ongoing commitment to shaping a positive culture.

Effective Teams are Engaged and Enabled

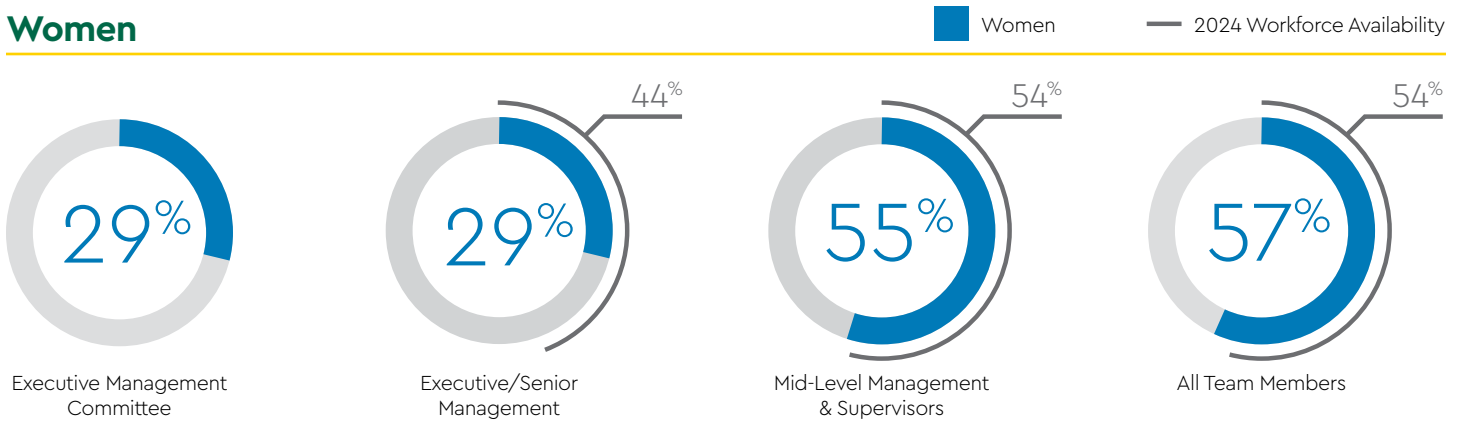
BASED ON 2024 TEAM MEMBER SURVEY BY KORN FERRY



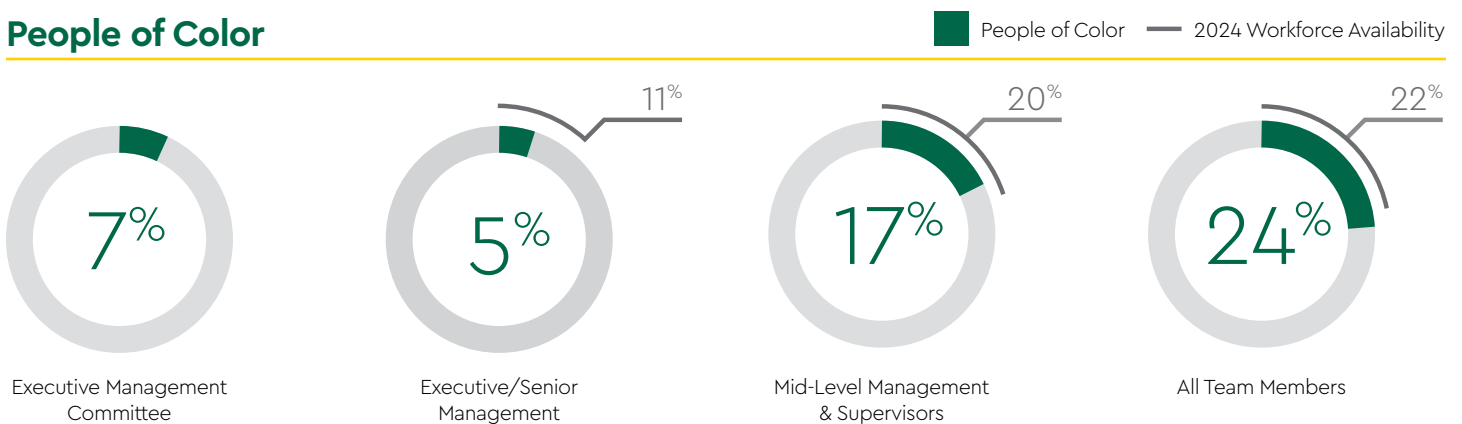
Workforce Demographics

We're committed to building a workforce that helps us see challenges from a wide variety of perspectives and is representative of the markets we serve.

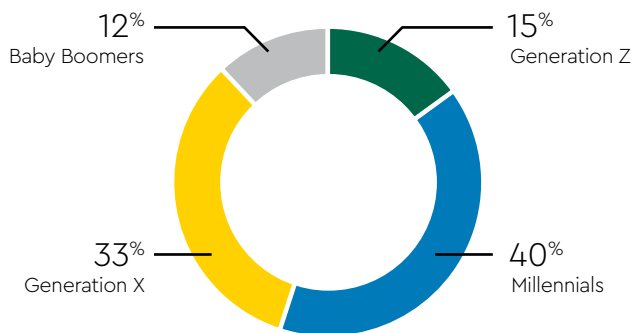
Women



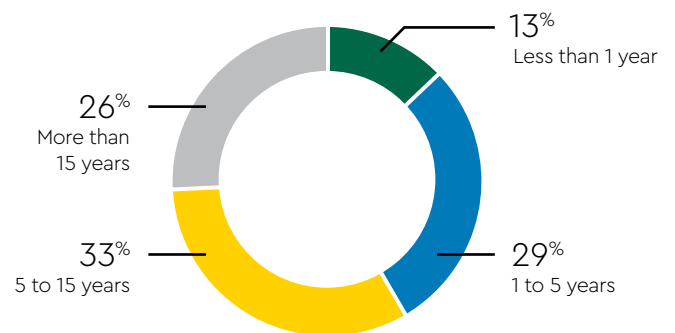
People of Color



Team Member Representation by Generation



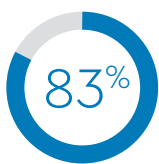
Team Member Representation by Tenure



Information as of 12/31/2024. Workforce availability is a weighted average based on job type and region. The workforce availability data used for the calculation is provided by a third-party vendor and is based on U.S. Census data.



Employee-led Resource Groups: Fostering a sense of belonging



Team members report feeling a sense of belonging at Commerce

We recognize that our workplace diversity makes us a stronger company, and our Employee-led Resource Groups (ERGs) contribute to a culture of inclusion every day. ERGs provide our team members with a supportive community where they can connect with others who share their interests, background or experiences; raise awareness of critical issues; and support good causes. Their existence helps to create a sense of belonging, which leads to increased engagement, motivation and

retention. By investing in ERGs, we are creating a culture that values and celebrates diversity, fosters creativity and innovation, and promotes a positive work environment for all team members. Approximately 45% of Commerce team members belong to one of these groups.

In 2024, ERGs hosted over 150 events with nearly 7,800 participants. Our ERGs have a Community Connector position that helps build support with community organizations and identifies opportunities to create sustaining and supportive relationships, with the goal of designating a leader from each ERG to this role in each market.

Our ERGs also lead the charge in setting up and spreading the word about volunteer opportunities. They have forged strong partnerships with local organizations and events, demonstrating our deep commitment to addressing the pressing needs of our communities.

ELEVATING ERG LEADERSHIP

Our ERG leaders are dedicated, hardworking professionals who shape Commerce's culture through their volunteer leadership. Recognizing their unique challenges, our ELEVATE training program equips group leaders with professional development and resources throughout their two-year commitment.

Since its introduction in 2021, ELEVATE has been instrumental in amplifying our ERG leaders' ability to impact change while providing a peer group for networking and relationship-building. The program focuses on developing critical competencies such as conflict resolution, public speaking and presentation skills — valuable abilities that enhance their effectiveness as leaders in any setting.

In 2024, ELEVATE welcomed over 30 market leaders to its comprehensive two-day, in-person workshop. The program

leverages self-assessment tools, helping leaders harness individual strengths and navigate challenges effectively.

A significant enhancement to this year's program was the introduction of specialized second-year programming. ERG leaders who participated in ELEVATE last year engaged in a half-day personal career development workshop.

The program included inspirational speakers, focused discussions on leadership competencies, action-planning sessions, and dedicated time for reflection and recaps. Participants left with actionable takeaways, including presentation templates designed to facilitate teach-back sessions with their respective leadership teams, encouraging continuous development and growth within their ERGs.

We remain committed to supporting our ERG leaders, recognizing their valuable contributions through their volunteer efforts and influence on Commerce's culture.

EMERGE

Nurtures a workplace culture that attracts, develops, engages and retains young professionals.

ENABLE

Cultivates an inclusive environment where those with apparent and non-apparent disabilities, caregivers and allies can thrive, collaborate, and serve as a resource for employee advocacy and customer insights.

PRIDE

Provides an open forum where LGBTQIA+ and allied teammates can aspire, develop and collaborate to reach their highest potential.

RISE

Empowers women as leaders, mentors, coaches and role models to enhance personal and professional relationships that improve the ability to attract, develop and retain top talent at Commerce.

SALUTE

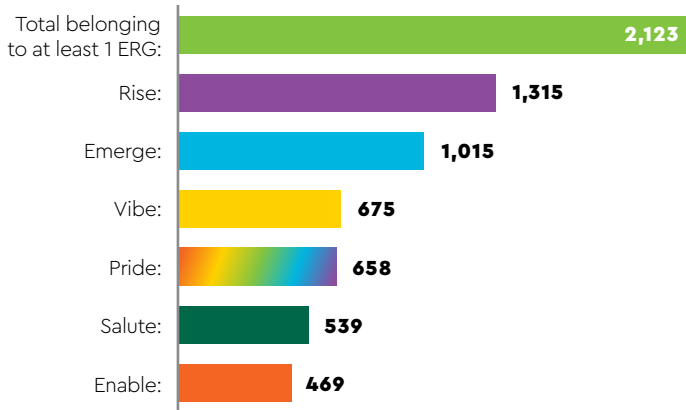
Creates an inclusive, dignified and diverse space for team members with a passion for supporting military veterans and their families.

VIBE

Fosters an environment where team members are valued, empowered and engaged to promote multicultural representation and retention.

2024 ERG Membership

TEAM MEMBERS MAY BELONG TO MORE THAN ONE ERG



Building and sustaining our team: recruitment, development, promotion and retention

We are dedicated to ensuring our team members feel appreciated and inspired to learn and grow with us. Our programs are designed to help team members achieve their professional goals, create strong networks, and advance their careers.

ALIGNING WITH TEAM MEMBERS' GOALS

Our performance management process, ALIGN, assists team members in setting and prioritizing attainable goals for both themselves and their managers.

Managers conduct monthly check-ins with team members, encouraging open communication and ensuring support toward accomplishing their performance goals.



FOSTERING GROWTH AND DEVELOPMENT AT COMMERCE

With every program, we are intentional in providing resources tailored to each team member's current career stage and future goals. Whether new to the company, expanding their role or aiming for leadership, we want team members to feel empowered to advance their careers with us. We have established a robust framework for team members to explore:

- The **Ambassador Program** pairs new team members with an existing Commerce team member to help orient them to the company.
- **Job shadowing** allows team members to explore jobs they may like and expand their network by shadowing someone in that role.
- **Managing at Commerce** helps new managers of all experience levels learn about Commerce's unique systems, processes and practices for managing others. This self-paced onboarding course introduces the processes, tools and resources needed for success in managing their new team.
- **Aspiring Managers** is a development program providing tools and skills for those who aspire to leadership roles. Based on Commerce's core leadership competencies, this five-month program introduces participants to management and supervisory concepts, such as focusing on self, AGILE thinking and managing results.

Investing in leadership at every level

We believe investing in our people is the most powerful way to build a stronger future — for our team members, our company, and the communities we serve. That's why our Leadership Development Series is vital to our commitment to internal growth. These nomination-based programs support managers and team leaders in strengthening their skills and advancing their careers at Commerce.

In 2024, over 100 team members participated in one of our four signature programs: the Executive Development Program (EDP), the Advanced Leadership Development Program (ALDP), the Leadership Development Program (LDP), and Women in Leadership (WIL). Each program provides development opportunities tailored to participants' leadership levels, offering focused skill-building, access to experts and peer connections.

These programs support our broader talent strategy, including succession planning, career advancement, and ongoing partnerships with educational external organizations.

EXECUTIVE DEVELOPMENT PROGRAM (EDP)

The Executive Development Program is a seven-month experience for Commerce's most senior leaders. In collaboration with the UMKC Bloch School of Management Executive Education Center, the program combines executive-level curriculum with customized Commerce content.

EDP helps participants prepare for significant leadership roles by building expertise in strategy, innovation, and enterprise-level decision making. Each cohort meets monthly for two-day sessions, culminating in a capstone where participants present innovative ideas to Commerce's Executive Leadership Team.

In 2024, the program returned for the first time since 2019 (due to COVID), with 23 senior leaders participating — reflecting Commerce's commitment to succession planning and senior leader development.

ADVANCED LEADERSHIP DEVELOPMENT PROGRAM (ALDP)

The Advanced Leadership Development Program is an eight-month experience for mid- to senior-level leaders. ALDP offers experiential learning, small-group collaboration, and engagement with executives.

Participants build competencies in strategic thinking, relationship-building, and leading through change, while developing peer networks that support cross-departmental collaboration. The program emphasizes continuous learning and personal reflection aligned with Commerce's leadership model.

LEADERSHIP DEVELOPMENT PROGRAM (LDP)

The Leadership Development Program provides a foundational experience for early- to mid-level leaders building their leadership identities and influence. Over eight months, participants engage in workshops, networking with senior leaders, and peer group projects.

The curriculum supports growth in self-awareness, communication and decision-making, focusing on Commerce's core leadership competencies. LDP fosters community through cohort learning, helping participants develop strong internal networks.

WOMEN IN LEADERSHIP (WIL)

2024 marked the second cohort of our Women in Leadership (WIL) program, a 10-month personalized experience designed to develop and empower women across the organization. Created with the IMPACT Group, a minority-owned leadership development firm, this program offers a triad approach: each participant is supported by a dedicated executive coach and their manager.

The program includes in-person sessions complemented by one-on-one coaching and collaborative work with managers. Participants focus on personal effectiveness, corporate visibility, and business acumen, while engaging in executive dialogues focused on strengthening their leadership brand. Every experience is tailored — no two participants follow the same path.



The Here We Grow initiative continues to spotlight the enriching experiences that define a career at Commerce. By featuring authentic stories from team members, the campaign reinforces a consistent theme: The reality of working at Commerce often far exceeds initial perceptions of what it's like to work at a bank. Amy Haegele, Senior Manager of Talent Development, shared her experience:

“ Our culture has helped team members **find a true sense of belonging** and supported their professions and personal growth. Through real voices and lived experiences, Here We Grow celebrates team pride, career momentum, and **what makes Commerce a standout place to work.** ”

Commerce Corporate Blue Chips

Efforts designated as Corporate Blue Chips are enterprise-wide priorities that help us achieve our strategic goals. They are innovative efforts that go beyond business as usual and rank as the highest-priority initiatives for the company. Our Commerce Bancshares, Inc. (CBI) Blue Chips address a range of priorities — from foundationally improving how we run our business to fundamentally transforming our business through new products or services.



ENHANCING OUR PEOPLE LEADERSHIP

Commerce highlighted the importance of people leadership by designating it as a CBI Corporate Blue Chip. This multi-year Blue Chip focuses on a core set of leadership competencies deemed essential for leaders at all levels of the organization. Commerce's commitment to developing, coaching and reinforcing these competencies emphasizes the critical role our leaders play in creating a positive team member experience and leading their teams to growth and results.



EXPANDING KNOWLEDGE THROUGH CONTINUED TRAINING

We provide continuous training and resources regarding areas of our business, our culture and other priorities, tailored to specific business needs. Below are examples of the various topics we offer team members:

COMMERCIAL

- Commercial products
- Sales training and coaching
- Business and technical writing
- Presentation skills
- Business etiquette
- Credit
- Change management
- Technology and systems

CONSUMER

- Retail product knowledge
- Sales
- Customer experience
- Fraud prevention
- Technology and systems
- Leadership and coaching

WEALTH

- Wealth management services and products
- Sales
- Compliance
- Technology and systems

OTHER TOPICS

- Our culture
- Risk management and compliance
- AGILE training and workshops
- Innovation workshops
- Inclusion
- Office 365® Training



SUPPORTING CAREER GROWTH FROM DAY ONE

In retail banking, the first impression matters — and that starts with our people. That's why our approach to onboarding and training goes beyond checking boxes. It's about setting up our team members for success from Day One and continuing to invest in their growth as they move forward in their careers.

From the moment a new hire walks through our doors, they are welcomed into a hands-on, structured onboarding experience. With the support of dedicated onboarding specialists, new retail team members receive one-on-one guidance throughout their first six months, helping them confidently navigate the training process while adjusting to their new role.

What makes this program different is that it doesn't stop once the initial training is complete. After as little as six months on the job, team members are invited to explore additional development opportunities. Whether through career conversations with retail leaders or participation in internal job search support programs, our team members are empowered to grow — both within the retail branch and across the broader organization.

We've created a blended learning model that combines virtual instruction with real-life, in-branch experience. This format not only supports learning, it gives our team members the opportunity to apply their knowledge in meaningful ways while developing the confidence and skills that open doors to future leadership roles.

Our approach reflects our broader commitment to investing in our people — not just in their current roles, but for the long-term. By aligning training with career development and culture, we help team members build a future with us while continuing to deliver an exceptional experience for our customers.

BUILDING CAREERS WITH THE ASCEND CAREER ACCELERATION PROGRAM

The Commerce Ascend Career Acceleration program, established over 70 years ago, provides recent graduates and skilled professionals with a tailored career path at Commerce, emphasizing a variety of experiences. Initially focused on commercial aspects, the program now offers insights into all revenue-generating areas of the bank. Participants in the Ascend program not only gain valuable financial services experience, but they also develop their leadership skills, helping them adapt to the ever-changing banking landscape.

The Ascend program includes the following activities:

- Mentorship
- Credit underwriting and risk assessment
- Supporting hiring needs across various business lines
- Collaborating with and learning from executive leadership
- Learning our sales process and assisting with customer interactions
- Gaining hands-on learning and experience through rotations in many different areas of the bank

Participants in the Ascend program align their interests with Commerce's hiring needs, leading to the role that best suits them. To learn more, [visit our website](#).

DEVELOPING TOMORROW'S IT LEADERS

At Commerce, information technology (IT) is vital to our operations, which drives our ongoing search for exceptional IT talent. To nurture the next generation of IT professionals, we established the Developer Acceleration Program (DAP). This full-time program, now in its 11th year, gives individuals experience with multiple technologies, delivery methods and operational functions to accelerate their learning and career growth. Once a team member completes the first three months of the program, they move into a 15-month rotational program to learn about our different products, teams and technologies. Every five months, team members move to a different working group. The program provides graduates with a thorough understanding of our technology systems and helps them identify the area in which they wish to start their career at Commerce. To learn more, visit [our website](#).



SHAPING FUTURE FINANCE LEADERS

The Commerce internship program provides a dynamic 11-week immersive experience through business networking events, professional development sessions, and hands-on experience. Each year, our team actively recruits interns at more than 60 campus events nationwide. In 2024, students from 27 universities joined the program. Commerce interns are given the chance to collaborate on capstone projects, addressing real business challenges and presenting their solutions to senior leadership. Interns and their mentors report high satisfaction with the program. Many interns return for subsequent internships or step into full-time positions, contributing to the growth and innovation at Commerce.

Team members helping team members

Commerce team members have a passion for supporting our customers and communities — and each other. The Employee 2 Employee Foundation (E2E) was established in 2016 to build a formal process for team members to help one another. E2E aims to support team members who find themselves in a tough spot financially, due to unforeseen events like medical emergencies or natural disasters. E2E is a separate, independent nonprofit entity led by an employee-based board of directors with members from a variety of departments across the bank. The foundation is powered by Commerce team members. The E2E board reviews applications from team members requesting assistance, either for themselves or on behalf of a fellow colleague. Since its inception, the E2E Foundation has distributed over \$1.6 million to more than 565 team members.



E2E IMPACT IN 2024

Amount distributed by the foundation to applicants: **\$281,238**

Number of team members who received assistance: **95**

ACTING WITH INTEGRITY



Our commitment to doing what's right

At Commerce, transparency and doing the right thing have been fundamental to who we are for nearly 160 years. Our unwavering commitment to ethical decision-making and accountability is woven into our culture, forming the foundation of how we do business. These enduring values are central to our growth, enabling us to serve our customers with purpose and care.

Our dedication to principled leadership shapes every decision we make, building trust with our stakeholders: our communities, customers and team members. In 2024, we continued our governance practices, reinforcing the standards that have guided us for generations toward meaningful progress.

With oversight from our Commerce Bancshares, Inc. Board of Directors (Board) and guided by our Code of Ethics, we strive to meet every opportunity and challenge with openness, responsibility and a focus on sustainable success.

How we approach compensation

Commerce's compensation philosophy is to provide a total compensation program that is performance-oriented and market-competitive to attract and retain top performers at all levels.

We strive to:

- Align compensation of our executive officers with corporate strategic goals and the long-term interests of our shareholders.

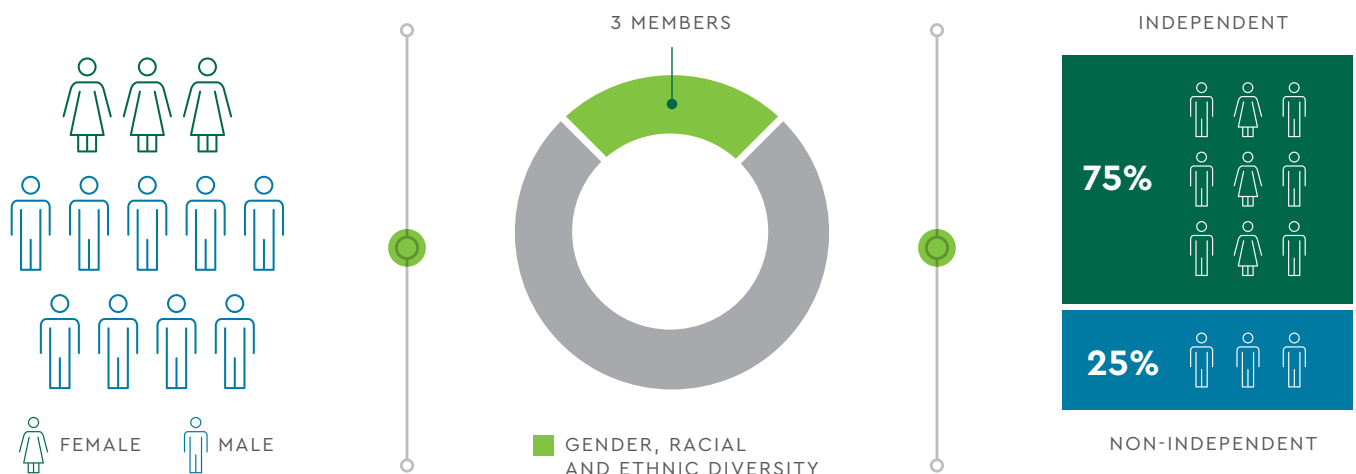
- Maintain an organization-wide competitive compensation program that takes into account external market data, enabling us to recruit and retain top talent.
- Be fair and equitable in the administration of our compensation plans.
- Communicate compensation packages transparently, effectively and clearly. Provide reward systems that are credible, consistent with our core values, and appropriately structured so as not to encourage undue risk.
- Reward individuals based on performance rather than on seniority, tenure or other entitlements.

For more information on executive compensation, please see our [Proxy Statement](#).

Prioritizing diversity in board leadership

The Board is composed of individuals with different backgrounds and professional experience. The Board believes diversity of perspective is crucial to representing the communities and customers we serve and strengthens our ability to provide long-term value for our shareholders. Accordingly, board diversity — including diversity with respect to race, ethnicity, gender, geography and areas of specialty — is an integral component in selecting nominees for board consideration.

Commerce Board of Directors



Maintaining Board oversight

The Board guides and oversees our strategic decision-making and initiatives. The Board has designated several committees, including the Compensation and Human Resources Committee, the Committee on

Governance | Directors, and the Audit and Risk Committee, to assist with its oversight. These committees meet regularly and report updates to the Board to help guide our Company's strategic direction.

Responsibilities of the Board of Commerce Bancshares, Inc. Committees

COMPENSATION AND HUMAN RESOURCES

- Establish the Company's general compensation philosophy and oversee the development and implementation of executive and senior management compensation programs.
- Review and approve corporate goals and objectives relevant to the compensation of executives and senior management.
- Review the performance of executives and senior management.
- Determine the appropriate compensation levels for executives and senior management.
- Make recommendations to the Board with respect to the Company's incentive plans and equity-based plans.
- Oversee regulatory compliance with respect to compensation matters, which includes oversight of the Company's policies on structuring compensation programs to preserve tax deductibility.
- Advise and consult with management on succession planning.

GOVERNANCE | DIRECTORS

- Evaluate candidates for directorship in the Company.
- Evaluate Board performance.
- Establish the agenda for the annual meeting of shareholders.
- Evaluate the quality of the information and analysis presented to the Board and standing committees.
- Assess the independence of directors.
- Evaluate the performance of the Company relative to corporate governance matters.

AUDIT AND RISK

- Monitor the internal control over financial reporting of the Company and review the audits of its financial statements.
- Appoint or replace the independent auditor, as needed.
- Review the performance of the Company's internal audit function and independent auditors.
- Review, approve and monitor the Company's risk appetite and supporting risk tolerance levels.
- Advise the Board with respect to the Company's policies and procedures regarding compliance with applicable laws and regulations, and with the Company's Code of Ethics.
- Evaluate, monitor and oversee the Company's risk management governance structure and risk management framework to ensure appropriate risk identification, measurement and reporting.
- Review management's assessment that the credit review system is appropriate.
- Oversee the Company's progress on environmental, social and governance initiatives and activities.

[The Compensation and Human Resources Committee Charter](#), [Committee on Governance | Directors Charter](#) and [Audit and Risk Committee Charter](#) is available for review on our website.

How we manage risk

Commerce has a long-standing conservative risk culture, which is aligned with our core values and guiding behaviors, as follows:

- **We have a long-term view:** We are willing to take measured risks and learn from mistakes.
- **We collaborate as one team:** We make decisions for the greater good.
- **We act with integrity:** We do what is right.
- **We are customer focused:** We ask, listen and solve to deliver the best value to our customers.
- **We strive for excellence:** We are personally accountable for achieving results. We continuously measure and improve our performance.

In today's banking environment, risk is omnipresent. We acknowledge that to continue to thrive, we must identify, measure, monitor and control the entire spectrum of risks we face. These include credit, market (interest rate), liquidity, operational, compliance, legal, strategic and reputational risks. To accomplish effective risk management, we have developed and actively maintain a strong risk culture. The Board's Audit and Risk Committee has also approved a Risk Management Policy that describes a formal governance structure for managing

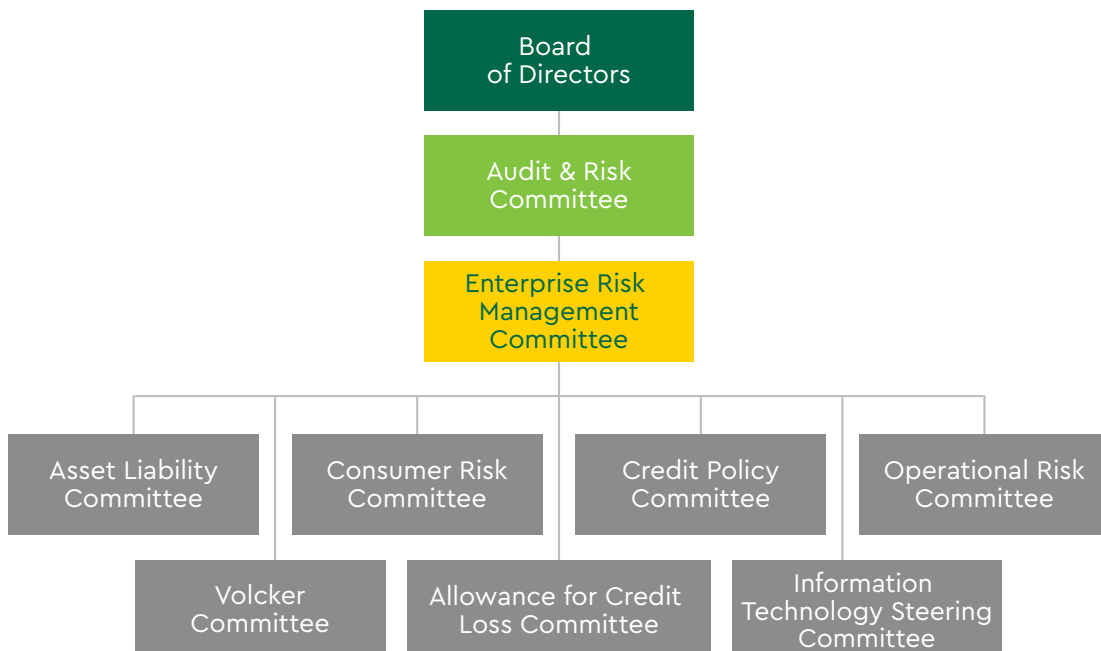
risk. As part of our governance structure, we maintain a network of specialized management-level risk committees to aid in the identification and monitoring of risk. The Board utilizes this structure to assess risk levels against established risk appetite thresholds. These committees routinely report on risk issues and, along with the chief risk officer and director of internal audit, provide regular updates to the Audit and Risk Committee.

Ensuring three lines of defense

The Board's risk governance structure includes a three-lines-of-defense framework. In this framework, the three lines of defense build upon each other to ensure a comprehensive risk management approach.

1. **Front-line businesses and supporting organizations** maintain ownership and management of risks.
2. **Risk management teams** monitor adequacy and effectiveness of controls at the first line of defense and report to senior management, management committees and the Audit and Risk Committee of the Board.
3. **Audit and other groups responsible for providing independent evaluation** conduct internal reviews of risk management practices.

Risk Management Governance Structure



Our Policy Management Program

Along with our defined risk governance structure and the three-lines-of-defense framework, Commerce has adopted a Policy Management Program. Our risk management policies help us evaluate and manage the full range of risks arising from the Company's activities. These policies are regularly reviewed and approved by the Audit and Risk Committee, the Enterprise Risk Management Committee, or one of the other specialized risk committees. Though not an exhaustive list of the Company's policies, the following relate to our ESG efforts and priorities:

COMMERCE BANCSHARES, INC. POLICIES

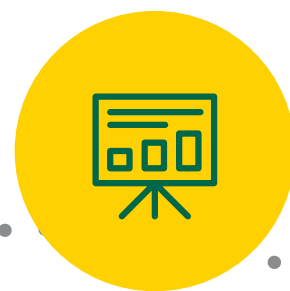
- Bank Secrecy Act | Anti-Money Laundering | Office of Foreign Assets Control Policy*
- Business Continuity Management Policy*
- Capital Policy*
- Commerce Trust Policy*
- Commercial Credit Policy*
- Complaint Management Policy
- Compliance Management Program*
- Consumer Lending Policy*
- Corporate Code of Ethics*
- Corporate Information Security Policy*
- Fair Lending Policy*
- Health Insurance Portability and Accountability Act (HIPAA) Policy
- Media Relations Policy
- Related Party Transactions Policy*
- Risk Management Policy*
- Social Media Policy
- Third-Party Risk Management Policy*
- Unfair, Deceptive or Abusive Acts or Practices Program Policy

*Denotes Board-level oversight

Training team members in risk management

All employees play a part in the effective management of risk, particularly within the scope of their respective roles and responsibilities. Employees complete extensive ongoing training to increase their level of risk awareness. Employees take recurring required training on many of the risk-related policies and other risk topics. Some of the training provided includes:

- Corporate Code of Ethics
- Risk Management Overview
- Complaint Management
- Recognizing Security Threats
- Protecting Sensitive Information
- Responsible Banking
- Financial Exploitation of At-Risk Adults
- Fraud Awareness and Prevention
- Social Engineering
- Fighting Identity Theft
- Money Laundering Prevention
- Bank Secrecy Act
- Disbursements Fraud



Compliance with consumer financial regulations

COMPLIANCE PROGRAM

Commerce is subject to many laws and regulations that extensively govern our relationships with our customers. Commerce maintains a program that is focused on compliance with consumer financial protection laws, rules and regulations and is consistent with our culture of putting our customers at the center of what we do. The Compliance Program is focused on compliance-related policies and procedures, monitoring, training and consumer complaint response. This program also includes, among other things, processes for risk assessments, regulatory change management, marketing reviews, and a review of new, modified, and existing products and services. The Compliance Program is subject to oversight by the Enterprise Risk Management Committee and the Audit and Risk Committee of the Board of Directors.

COMPLIANCE POLICIES AND PROCEDURES

Commerce maintains general compliance policies that address various consumer financial protection laws and regulations, including:

- Equal Credit Opportunity Act
- Fair Credit Reporting Act
- Truth in Lending Act
- Truth in Savings Act
- Electronic Fund Transfer Act
- Expedited Funds Availability Act
- Home Mortgage Disclosure Act
- Fair Housing Act
- Real Estate Settlement Procedures Act
- Fair Debt Collection Practices Act
- Servicemembers Civil Relief Act
- Laws regarding unfair, deceptive and abusive acts and practices
- Other laws and regulations related to consumer financial protection

These and other policies are reviewed and approved annually as part of our risk governance committee framework and the Policy Management Program referenced here.

COMPLIANCE MONITORING

Completing risk assessments helps the Company identify current and emerging compliance risks to prevent and address potential compliance issues. Commerce's compliance framework consists of a series of controls that are designed to detect and mitigate compliance risks. Commerce performs monitoring, testing and general review activities related to compliance controls.

COMPLIANCE TRAINING

Compliance training for Company employees is mandatory, designed for the size and complexity of our organization, and delivered to team members using a needs-based approach according to employee role. This content is developed and maintained internally and designed specifically for Commerce. An abbreviated list of trainings that are required for employees can be found earlier in this report. These and other courses are required as part of new hire onboarding as well as recurring for existing employees.

CONSUMER COMPLAINT RESPONSE

To ensure all complaints are given prompt, courteous and fair attention, Commerce has a Complaint Management Program. As part of this program, we collect, review, and appropriately respond to customer complaints. The feedback we receive from customers allows Commerce to review and identify trends and make improvements to our products, services, processes and procedures with a focus on improving the customer experience.

PRODUCT GOVERNANCE

New, modified or expanded products or services have a process for review prior to their implementation. This process is carried out by internal working groups consisting of cross-functional leaders representing impacted business areas, key risk management functions, and project management. An important component of these reviews is evaluating consumer financial protection laws and regulations that are applicable to the new product, service or modification of an existing product or service.

MARKETING REVIEW

Commerce has a centralized marketing review process. Marketing and promotional materials are reviewed by legal counsel and risk management professionals, and the reviews include evaluating applicable laws and regulations.

Bank Secrecy Act | Anti-Money Laundering (BSA | AML) Program

We have implemented risk-based policies and procedures designed to comply with anti-money laundering (AML) and sanctions regulations established by governmental authorities. These include, but are not limited to, the Bank Secrecy Act (BSA), the USA PATRIOT Act, and international sanctions regulations implemented by the U.S. Department of the Treasury.

Commerce is subject to the customer due diligence rules issued by the Treasury's Financial Crimes Enforcement Network under the BSA. These rules require financial institutions to maintain customer due diligence programs designed to:

1. Identify and verify the identity of our customers
2. Identify and verify the identity of the beneficial owners of companies that open accounts with us
3. Understand the nature and purpose of the customer relationships to develop customer risk profiles
4. Conduct ongoing monitoring to identify and report suspicious transactions
5. On a risk basis, to maintain and update customer information

The BSA officer leads this function and provides regular updates to the Enterprise Risk Management Committee.

All employees are required by policy to take annual BSA | AML | OFAC training. This training — which includes regulatory requirements, policies and operating procedures — emphasizes the importance of BSA reporting requirements and OFAC regulations. In addition, an overview of BSA requirements is given to all new employees as part of our new-hire training. Our BSA | AML program leverages technology to aid in the identification

of suspicious and/or illegal activities — including, among others — money laundering, terrorist financing and human trafficking. Our program, including the systems in use to support it, is subject to regular and ongoing oversight by Internal Audit and Model Risk Management and to frequent examinations by state and federal regulators.

Credit Policy Program

Commerce recognizes the risks inherent in our lending practices and that certain portfolios may carry higher levels of risk. The Company's Credit Policy Committee oversees tracking of industry, product and individual borrower concentrations. These concentration limits are designed to create a well-diversified credit portfolio consisting of high-quality loans that are monitored by the Credit Risk Administration team, which reports to the chief credit officer.

Employees within the Commercial, Consumer and Private Client lines of business work alongside Credit Administration to identify and monitor emerging risks in their respective loan portfolios. On a quarterly basis, these teams discuss emerging risks during the Credit Policy Committee meeting. All employees in lending-related functions undergo periodic training on the Company's credit risk appetite, policies and regulations.

As part of our enhanced risk management process for commercial borrowers within certain industries, we utilize industry-specific lending metrics and underwriting teams with subject matter experts who have a broad and thorough understanding of the risks as well as the environmental and social impacts of those industries. For consumer lending, we consider a combination of factors to determine a borrower's ability to repay while also ensuring that we provide loan product options that meet the borrower's credit needs.

THREE LINES OF DEFENSE FOR CREDIT RISK

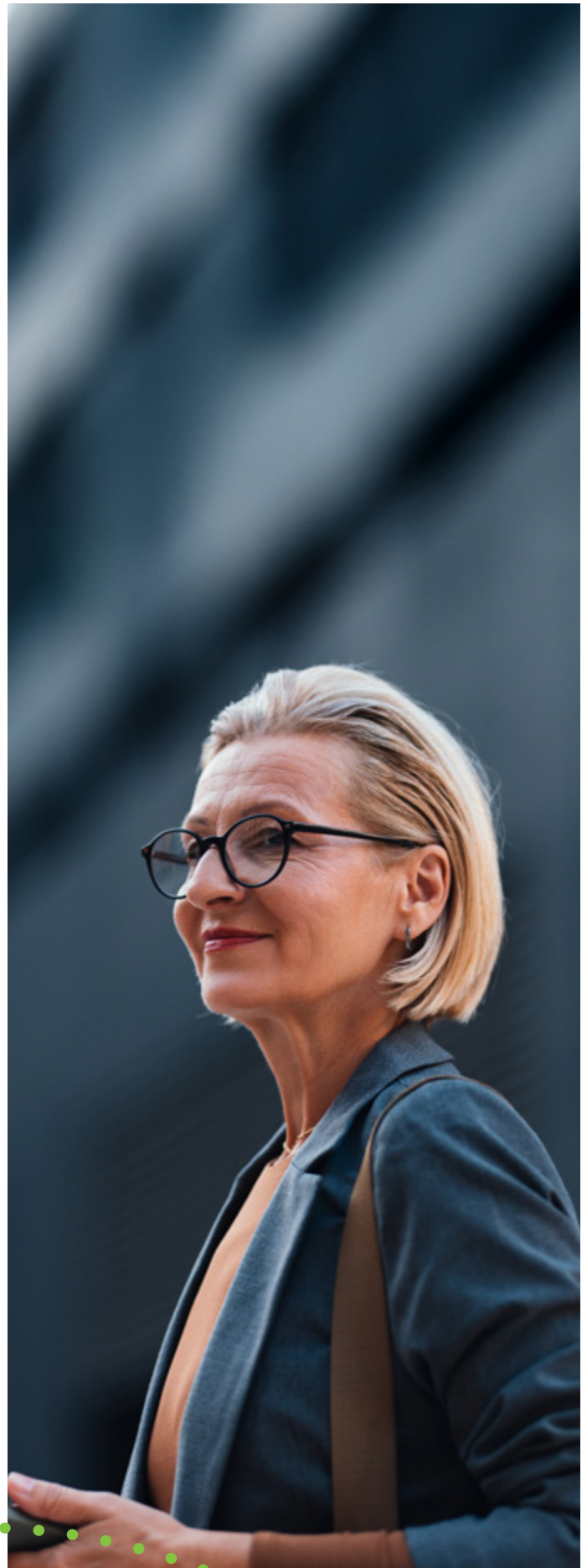
Consistent with our enterprise risk management structure, our credit risk management process is built upon three lines of defense. The first line of defense, which includes relationship managers and other line of business personnel, owns and manages the risks we face in our day-to-day operations. These include the application of heightened underwriting standards for certain industries, when applicable.

The second line of defense, which includes Credit Administration, Credit Officers and BSA | AML personnel, assesses risk and oversees the risk-taking activities of the first line of defense. This line of defense needs to concur with the first line's assessment of risk before a new loan can move forward to approval.

The third line of defense, which includes Internal Audit and Credit Review teams, performs independent reviews and assessments of risk management practices of the first and second lines of defense. Our portfolios and processes are examined regularly to ensure compliance with existing loan and monitoring policies. If the third line of defense determines that an action plan must be established to mitigate an identified risk or operational issue, the first and second lines of defense, as appropriate, are tasked with developing and executing the plan within a given time frame. The third line of defense monitors and audits the actions taken to ensure the risk has been appropriately mitigated. We are also reviewed by state and federal regulators annually.

MITIGATING ENVIRONMENTAL RISK

For over 10 years, our real estate appraisal team has maintained a targeted focus on environmental impact and liabilities according to our risk management policies. Each new real estate project, whether it is our customer's or our own, is subject to a thorough assessment of environmental risks. The team structures the depth of the assessment according to the level of risk. This due diligence aids the Company in underwriting transactions and helps customers to be aware of potential environmental liabilities that may compromise their business goals. The group also reviews corporate projects for environmental risks in consideration of the health and safety of our customers and team members and the communities in which we operate.



Maintaining a high standard for ethics and compliance

We are committed to the highest standards of ethical and professional conduct for all Commerce team members, officers and directors. We believe governance is a shared responsibility and that we all have a role in protecting sensitive information, maintaining ethical practices, and complying with laws and regulations. In 2024, 100% of our team members completed mandatory annual training on the Corporate Code of Ethics.



ANONYMOUS TIP LINE

The anonymous tip line is a dedicated, 24/7 phone line that provides team members with a confidential avenue and allows them to remain anonymous when reporting a matter. Tips can also be reported online. An independent organization staffs the anonymous tip line with specially trained representatives to document team member matters and relay the information to Commerce management.

ANONYMOUS TIP LINE

Team members are encouraged to report any unethical, illegal or unsafe behavior through our secure, anonymous 24-hour phone line maintained by a third-party vendor. Providing quality, ethical service to our customers is the highest priority at Commerce. Any fraud against, abuse of, or discrimination against customers is unacceptable. Our expectation is that every team member is part of a team effort to look for and prevent inappropriate treatment of customers or employees. Commerce wants, and encourages, team members to question and report any concerns with Company policies or actions by staff that they believe are, or could be, improper. We provide multiple channels for team members to raise such concerns. Team members may contact management or report concerns using the anonymous tip line.

ANTI-DISCRIMINATION AND ANTI-HARASSMENT

At Commerce, we recognize the importance of maintaining an environment that is free from unlawful discrimination and harassment. We uphold our responsibility to ensure that Commerce team members are not subjected to unlawful discrimination and/or harassment in any term or condition of employment on the basis of a protected status. We define a protected status as race, color, ancestry, ethnicity, gender, gender identity, gender expression, sex, sexual orientation, disability (including physical or mental condition), age, veteran status, military status, national origin, religion, pregnancy status, genetic information or any other status protected by applicable federal, state or local law. Our goal is to ensure that conduct never reaches the level of unlawful behavior. Accordingly, Commerce prohibits conduct that is inconsistent with our values, whether that conduct violates the law or not.

Commerce prohibits any unwelcome verbal or physical conduct that maligns or shows hostility or aversion toward a team member because of their protected status. This prohibition applies to all individuals who work for or with Commerce, including officers, managers, supervisors, team members, clients, customers, vendors or suppliers. We believe every Commerce team member is responsible for preventing harassment and discrimination and upholding our values. All Commerce employees are therefore required to complete anti-discrimination and anti-harassment training annually. We also provide training on our culture and values for new and existing team members. Any team member who has a question, concern, or complaint of discrimination or harassment based on a protected status is encouraged to bring the matter to the immediate attention of their management team or the Commerce Legal Department or through the anonymous tip line.

PROTECTING TEAM MEMBERS FROM RETALIATION

Commerce will not retaliate against any individual who makes a report or complaint in good faith. We prohibit retaliation against a team member (as well as those with whom the team member is closely associated, such as a spouse, significant other and/or family members) for reporting discrimination or harassment, assisting in making a discrimination or harassment complaint, or cooperating in a discrimination or harassment investigation.

No employee, officer or director will be penalized, retaliated against or be made subject to any corrective action as the result of their good faith reporting of suspected violations of the Code of Ethics. Further, as required by the Sarbanes-Oxley Act of 2002, Commerce has adopted a Financial Matters Complaint Policy and an associated reporting process to provide an anonymous means for reporting accounting, auditing and other financial matters concerns.

Information security and data privacy

Commerce has adopted comprehensive information security and data privacy policies aligned with the National Institute of Standards and Technology and International Organization for Standardization standards, and regularly benchmarks our information security program against reputable industry assessments. Our security governance framework includes a dedicated information security program that reports regularly to the Information Security

Strategy Board, the Operational Risk Committee, the Enterprise Risk Management Committee, the board's Audit and Risk Committee and the Board of Directors.

All employees and contractors are required to take regular training on information security requirements and must acknowledge policies and standards annually. In addition, we conduct frequent phishing campaigns to test team members' knowledge, educate them on spotting phishing attacks, and measure the effectiveness of our training program. [The Commerce Privacy Statement](#) serves as a standard for all team members for the collection, use, retention and security of nonpublic personal information and provides detail on how customers may limit use of their information by Commerce.

Finally, applications, databases, information technology infrastructure, service providers and business units that handle sensitive information are evaluated annually as part of our information security risk assessment. We also assess any new applications, infrastructure components and service providers before they are integrated with our existing systems. Commerce contractually requires all service providers, contractors, subcontractors or other third parties that process, transmit, access, or store Company or customer data to be in compliance with all applicable laws and to comply with all relevant Company policies (including, but not limited to, retention, encryption, transmission and application security policies) and safeguards. For more information on the cybersecurity program, please see [our Form 10-K](#).



Incident response programs

An Incident Response Plan has been developed that outlines roles, responsibilities, procedures, critical systems and key contacts for responding to a security incident. This plan is reviewed and tested throughout the year. The Company's Cybersecurity Incident Investigation and Response Plan is a component of the Information Security Policy and sets forth the severity categories and processes required to assess the impact of a security-related incident to the Company. The impact is categorized in severity levels as low, moderate and high — and is expressed in terms of financial loss; strategic objectives; customer; legal and regulatory; reputation; and service interruption.

The Incident Investigation and Response Plan is an escalation process; as the impact of the incident becomes more significant or widespread, the escalation level increases, bringing more resources to handle the incident.

Maintaining business continuity

Commerce must remain operational, regardless of any event that may affect the Company's team members, facilities or infrastructure. Should operations be threatened by a business disruption, the Business Continuity Management (BCM) Program ensures the Company's preparedness and efficient response to maintain operations. The BCM team does this by identifying

risks and taking actions to eliminate or mitigate the potential impact of those risks. Our BCM efforts help ensure continuity of operations to fulfill the Company's responsibility to shareholders, customers and employees as well as all legal and regulatory BCM standards. The BCM team collaborates with management to ensure plans and processes are in place to fully meet all requirements.

The BCM team proactively coordinates with business units throughout the Company to develop and maintain business continuity plans, conduct plan testing, and facilitate tabletop exercises to maintain readiness. The team oversees the Pandemic Preparedness and Response Plan and the Crisis Management Plan, and is a key contributor to the maintenance of the Company's Crisis Communications Plan. The BCM team works with information technology to organize the Company's Disaster Recovery exercises and coordinates with the Department of Homeland Security (DHS) and other outside groups to monitor potential threats. Annually, the Company conducts crisis management tabletop exercises with members of the executive management team. BCM leads enterprise-wide business continuity awareness education activities to ensure familiarity with best practices and response readiness at every level of the Company.

BCM planning is an ongoing process that requires the creation of detailed plans. These plans identify critical functions and address business unit needs for recovery from any event that interrupts normal business operations. The BCM team conducts regular testing and exercising of the plans and makes regular updates to keep existing plans up to date and ensure their accuracy.



Integrity grows trust

At Commerce, we believe that growth rooted in integrity stands the test of time. Our commitment to doing the right thing — for our customers, team members, communities and shareholders — is what drives us forward. With unwavering accountability and guidance from our Board of Directors, we remain dedicated to building trust and strengthening relationships. Moving forward, our integrity will continue to guide us, helping us grow responsibly and serve with purpose every step of the way.



SUSTAINABLE OPERATIONS



Building a sustainable future for our communities

Our commitment to sustainable operations guides the way we do business. Reducing the environmental impact of our operations supports the well-being of our team members, customers and communities — and strengthens the long-term resilience of our company. Our efforts focus on minimizing waste, conserving resources and reducing our carbon footprint. Throughout 2024, we maintained our focus on energy conservation, recycling and responsible resource management, steadily progressing our existing sustainability initiatives. These consistent efforts reflect our commitment to environmental stewardship and our belief that responsible business practices contribute to business success.

Integrating sustainability in all we do

We approach building and renovation decisions by weighing the needs of customers and team members as well as our environmental impact. As we develop new projects, we look for every opportunity to reduce the carbon footprint of our buildings. From the materials we use to the energy systems we install, we consider environmental impact and long-term sustainability at every turn.

We work closely with the architect, contractor and subcontractor on each project to comply with local regulations and regularly incorporate LEED (Leadership in Energy and Environmental Design) best practices in our construction designs. LEED provides guidelines for healthy, efficient and cost-saving green buildings. We will continue to look for opportunities to build and remodel according to LEED principles. We consider many factors when designing a project:

- Preference for working with local suppliers
- LED lighting
- Waste reduction and recycling
- High-efficiency HVAC
- Sustainable materials, including insulation, carpeting and paint
- Minimizing volatile organic compounds
- Reducing runoff
- Creating a positive work environment, elevated by improved lighting and air quality

Sustainability is a community effort

We have found ways to engage the community in everything we do — including our sustainability work. Commerce supports many organizations that benefit the environment in our markets, including:

- Missouri Botanical Garden
- Powell Gardens
- Kansas City Rose Society
- Seed St. Louis
- Forest Park Forever
- Tower Grove Park
- Sun Foundation

Leading meaningful change for a more sustainable future

Our commitment to sustainability is driven by the passion and innovation of our Green Team. This dedicated group of volunteers leads environmental efforts at a grassroots level, inspiring everyone to think greener and embrace sustainable practices.

The team's mantra — "rethink, reduce, reuse and recycle"— continues to shape our approach to minimizing waste and reducing our environmental footprint. In 2024, the Green Team expanded its impact through hands-on initiatives, including collecting 2,420 pounds of electronic waste at our April recycling event and facilitating the transition of a Kansas City break room from single-use plastics to reusable cups, plates and utensils.

Recycling waste

To decrease our carbon footprint, we continued our recycling programs throughout 2024 and achieved the following:



458.0 METRIC TONS
of paper shredded and recycled



13.2 METRIC TONS
of computer hardware recycled



Community involvement remains a cornerstone of the Green Team's mission. From participating in highway cleanups and tree planting to serving on environmental boards, our team members are actively working to make a difference. Educational initiatives, such as webinars on topics like native plants and glass recycling, further equip team members with the knowledge to adopt greener habits in their daily lives.

Through education, action and engagement, the Green Team serves as an advocate for sustainability. By sharing green stories and ideas, they ensure that sustainability isn't simply something we talk about — it's woven into how we operate every day.

Reducing our energy consumption

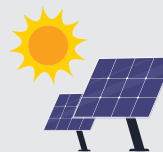
We are dedicated to mitigating the environmental impact of our daily operations. Across our footprint, we find opportunities to invest in alternative and clean energy sources to promote long-term sustainability. Our focused clean energy initiatives began over 15 years ago and continue today.

SOLAR PANELS

As of 2024, we've installed solar panels on more than 10% of our retail branch buildings.



678,000+ KWH
of clean energy from solar panels installed on our branches



63,000+ KWH
of clean energy produced through investment in a solar farm

INSTALLING LED LIGHTING

For several years, we have been updating the lighting systems in our buildings to LED. While all eligible branches have LED lighting systems, we continue to make progress on our corporate buildings. These updates will reduce our annual energy consumption every year, going forward.

Electric vehicle charging

For our customers, team members and guests with electric vehicles, we offer charging stations at numerous branch and corporate building locations. As electric vehicle adoption continues to grow, Commerce continues to evaluate needs for providing charging stations at banking locations and office buildings. Providing charging stations for electric vehicles not only demonstrates our commitment to sustainability and reducing carbon emissions, but also offers a valuable convenience to customers who drive electric cars.



17,873
reported EV charging sessions in 2024



21 STATIONS
installed, maintained and operational
at Commerce Bank locations

Mitigating environmental risk in real estate loans

For over 10 years, our real estate valuation team has maintained a special focus on the environmental risks of new real estate projects. Each new project is subject to a thorough assessment, thus increasing awareness of potential contamination, environmental impacts, and approaches to mitigate identified risks.

The team's due diligence helps customers to be aware of potential environmental liabilities that may compromise their business goals. We also review our own real estate for environmental risks to protect the health and safety of our customers and team members

Eco-friendly practices drive success

Looking to the future, our dedication to sustainability remains a key factor in minimizing our environmental impact and ensuring our company's success. Through the adoption of sustainable technologies and practices, we are well-prepared to succeed in an ever-evolving business environment.



COMMERCE BANCSHARES, INC.

**1000 WALNUT
P.O. BOX 419248
KANSAS CITY, MO 64141-6248**

**Phone: (816) 234-2000
(800) 892-7100**

EMAIL: CBShInvestorRelations@commercebank.com

WEBSITE: www.commercebank.com

An Equal Opportunity Employer

Copyright ©2024 Commerce Bancshares, Inc. All rights reserved.