

**COMMERCE BANK  
CAPITAL RATIOS  
MARCH 31, 2012**

|                   | <u>March<br/>2012</u> | <u>December<br/>2011</u> | <u>December<br/>2010</u> |
|-------------------|-----------------------|--------------------------|--------------------------|
| 1. Leverage Ratio | 8.48%                 | 8.36%                    | 9.00%                    |
| 2. Tier I RBC     | 13.04%                | 12.94%                   | 12.78%                   |
| 3. Total RBC      | 14.29%                | 14.19%                   | 14.03%                   |