RISING TO THE CHALLENGE

COMMERCE BANCSHARES, INC.

Investor Update
May 2017

Charles G. Kim
Chief Financial Officer

Jeffery Aberdeen
Controller

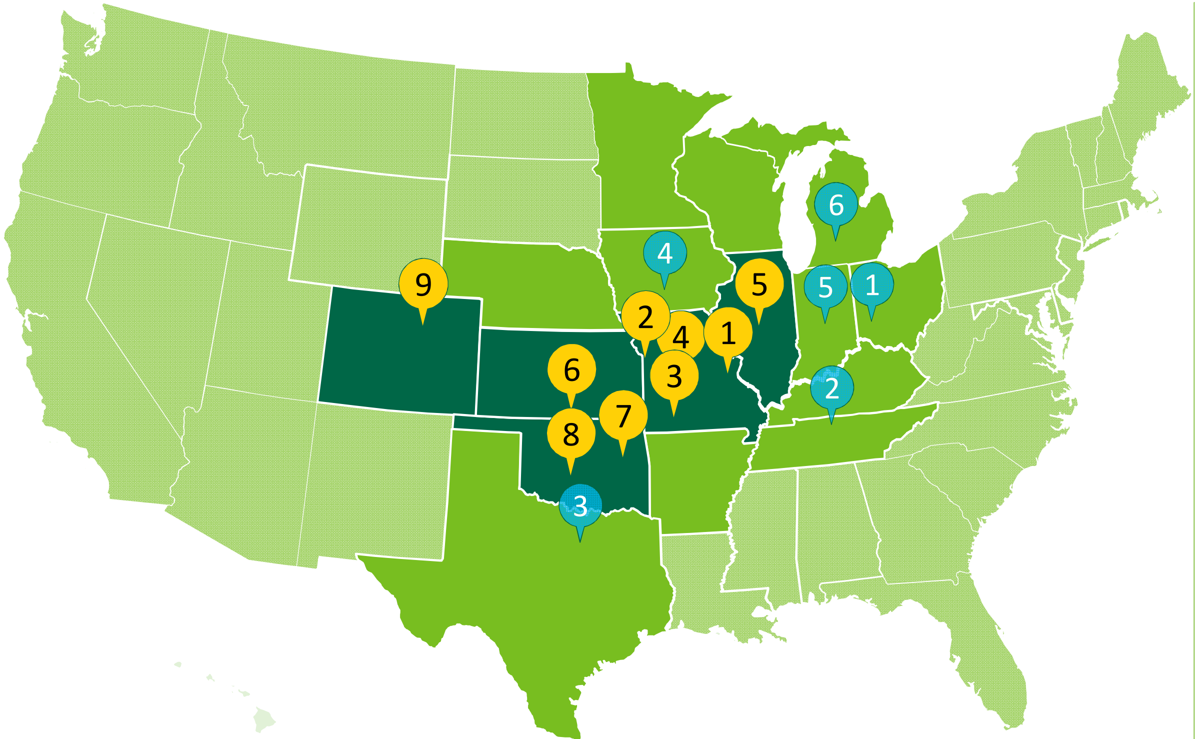
Commerce Bancshares, Inc.

CAUTIONARY STATEMENT

This presentation may contain “forward-looking statements” within the meaning of the Private Securities Litigation Reform Act of 1995, such as statements of the Corporation’s plans, goals, objectives, expectations, projections, estimates and intentions. These forward-looking statements involve significant risks and uncertainties and are subject to change based on various factors (some of which are beyond the Corporation’s control). Factors that could cause the Corporation’s actual results to differ materially from such forward-looking statements made herein or by management of the Corporation are set forth in the Corporation’s 2017 1st Quarter Report on Form 10-Q and the Corporation’s Current Reports on Form 8-K.

ABOUT COMMERCE BANCSHARES

FOUNDED IN 1865 AND OVER 150 YEARS OF...
BUILDING COMMERCE
STRENGTH • COMMUNITY • INNOVATION
150 YEARS



Branch Footprint   Extended Commercial Markets

Commercial Payment Services

Nine key markets

❶ St. Louis
❷ Kansas City
❸ Springfield
❹ Central Missouri
❺ Central Illinois
❻ Wichita
❼ Tulsa
❽ Oklahoma City
❾ Denver

Commercial offices

❶ Cincinnati
❷ Nashville
❸ Dallas
❹ Des Moines
❺ Indianapolis
❻ Grand Rapids

Super-Community Bank founded in 1865

38th largest U.S. bank based on asset size[1]

$25.3 billion in assets

$21.1 billion in total deposits

$44.5 billion in Trust assets

184 branches and **378** ATMs

152 thousand mobile customers

396 thousand active online banking customers

Source: [1]SNL Financial as of 12/31/2016
Company reports and filings as of 03/31/2017

Commerce Bancshares, Inc.

SUPER-COMMUNITY BANK PLATFORM

A CONSISTENT STRATEGY WITH A LONG TERM VIEW

Community Bank

- Responsive to customer needs and changing preferences
- Core values embraced by employees
- Award winning customer service
- Focus on the full client relationship

Customer relationship-based

We ask, listen and solve.

High performing teams and engaged workforce

Investment in distinctive, high-return businesses

Long history of top quartile credit quality metrics

Disciplined approach to acquisitions

Focus on operational efficiencies

Super-Regional Bank

- Sophisticated payment system capabilities
- Broad consumer product offerings
- Private Banking; Trust; Capital Markets
- Shareholder driven and strong financial performance
- Competitive on unit costs

A STRONG EMPHASIS ON CULTURE

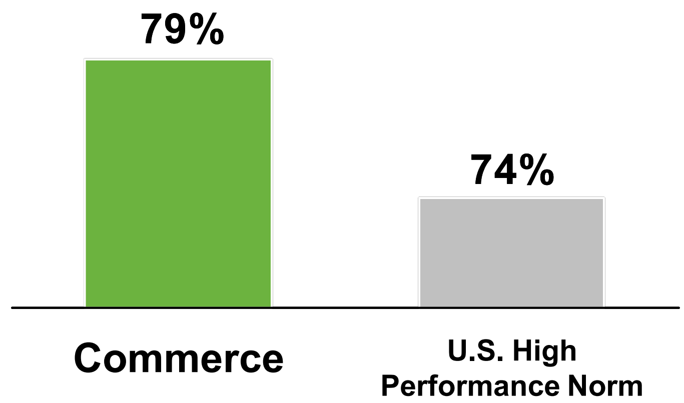
Giving VOICE to our VALUES

We have a long term **V**iew
We collaborate as **O**ne team
We act with **I**ntegrity
We are **C**ustomer focused
We strive for **E**xcellence

THE Commerce EDGE

- Engaged, long-term leadership team
- Focus on people and talent development
- Knowledge of customers and markets
- Collaboration drives sales across business lines
- Focus on EPS growth
- Investing in the communities in which we operate

2016 Employee Engagement[1]



- Provided almost $4 million in community support[2]
- Rated "outstanding" from the Federal Reserve for community reinvestment
- Employees heavily engaged in the communities we serve

ENABLES EXECUTION OF CORPORATE STRATEGIES

[1]The Hay Group – 2016 survey results
[2]Commerce and its related foundation

STRONG FINANCIAL PERFORMANCE IN 2016

1 year TOTAL RETURN ON COMMON STOCK ↑45%

Growth in Earnings per Share	Market capitalization	Revenue growth
↑7%	$5.9B	↑7%

Deposit growth $1.1 billion	Growth in loans $983 million	Net loan charge-offs to loans
↑6%	↑8%	.25%

Long term performance remains strong

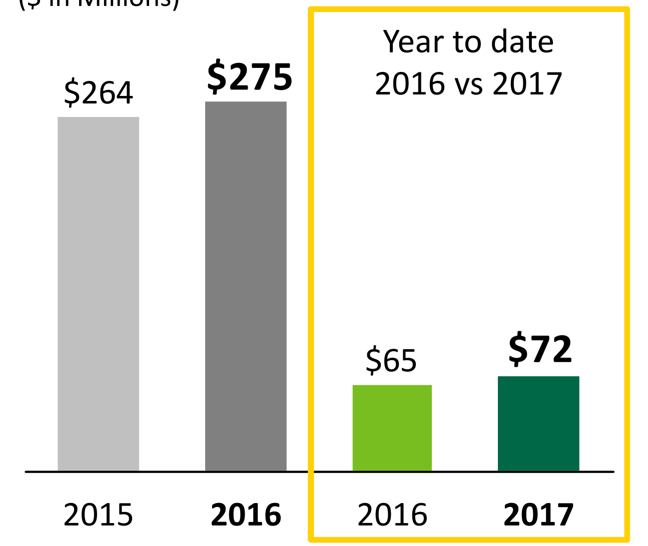
10 year TOTAL SHAREHOLDER RETURN @ 9.66%

FINANCIAL PERFORMANCE VS. PRIOR YEAR

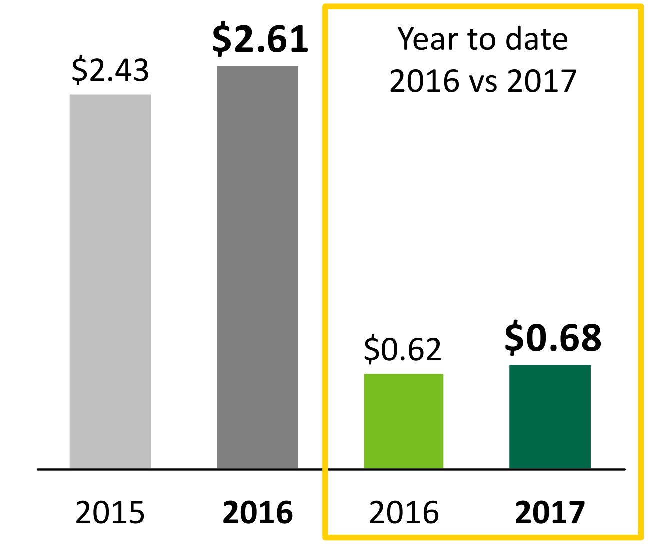
YE 2015 | YE 2016 | YTD 2016 | YTD 2017

Net Income Attributable to CBI

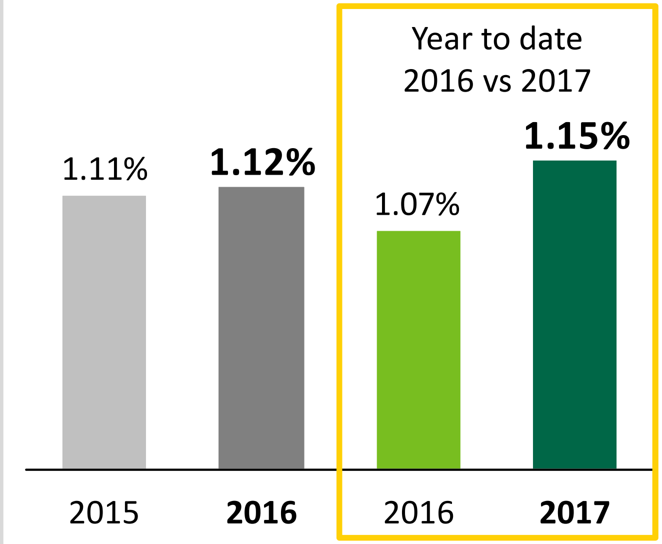
($ in Millions)



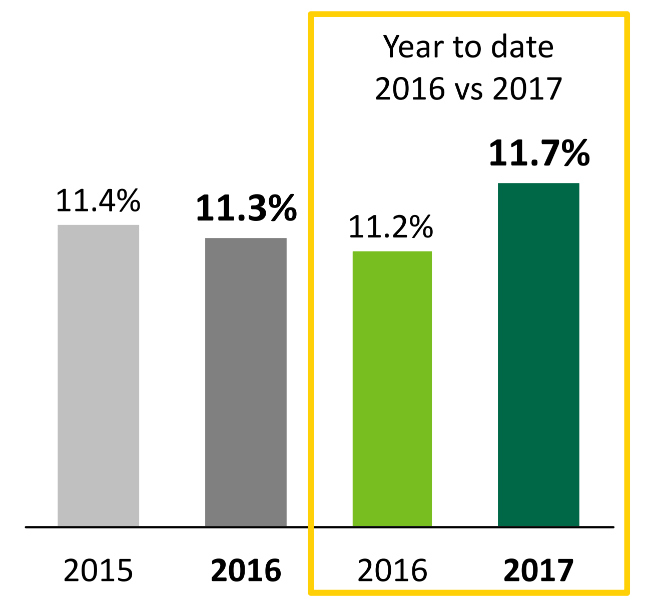
Earnings per Common Share



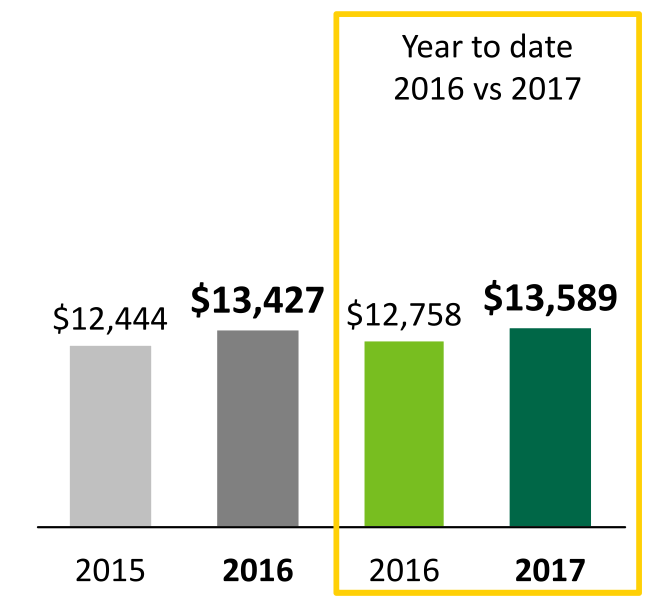
Return on Total Assets



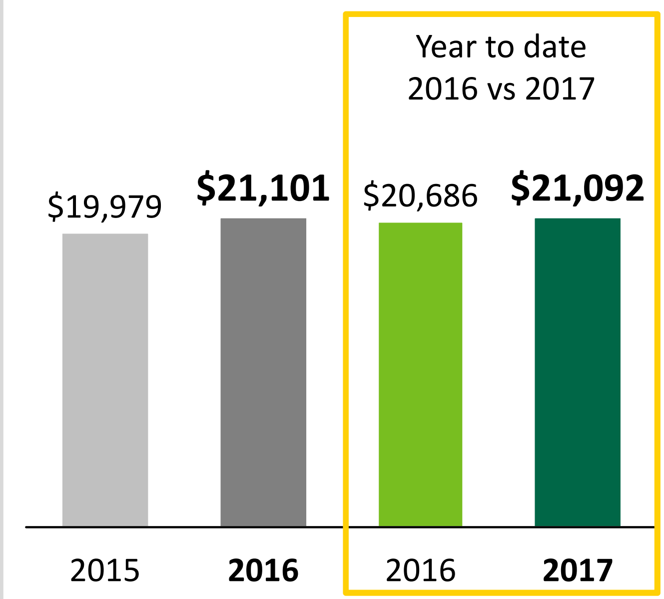
Return on Average Common Equity



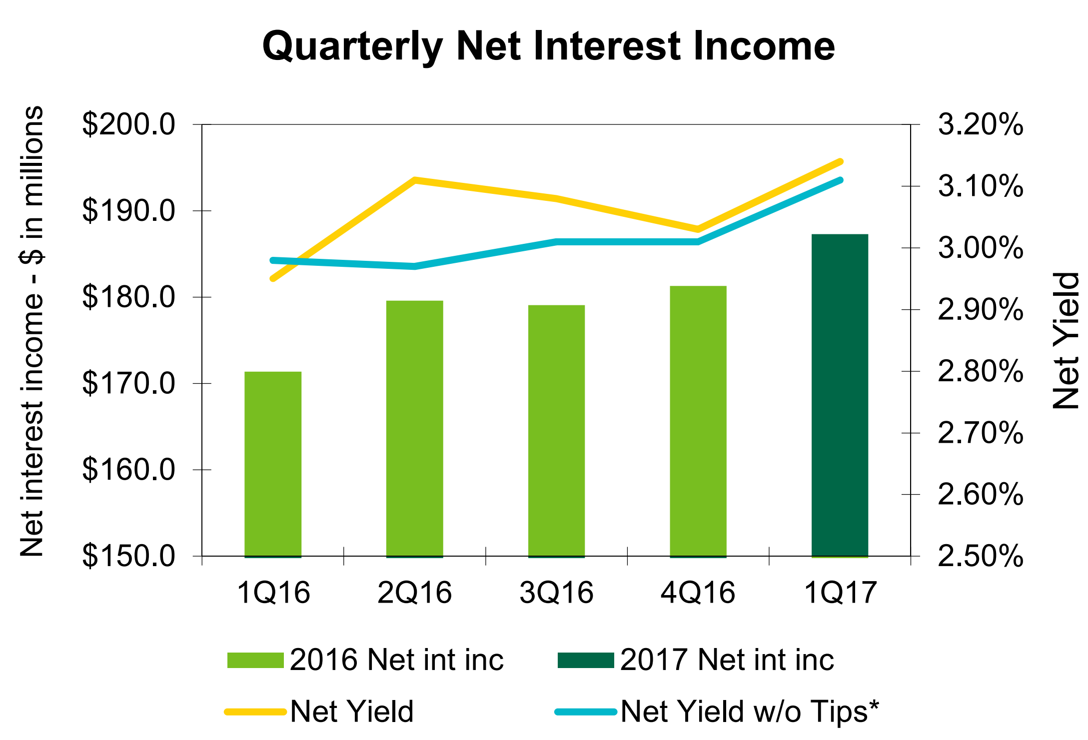
Period End Loans ($ in Billions)



Period End Deposits ($ In Billions)

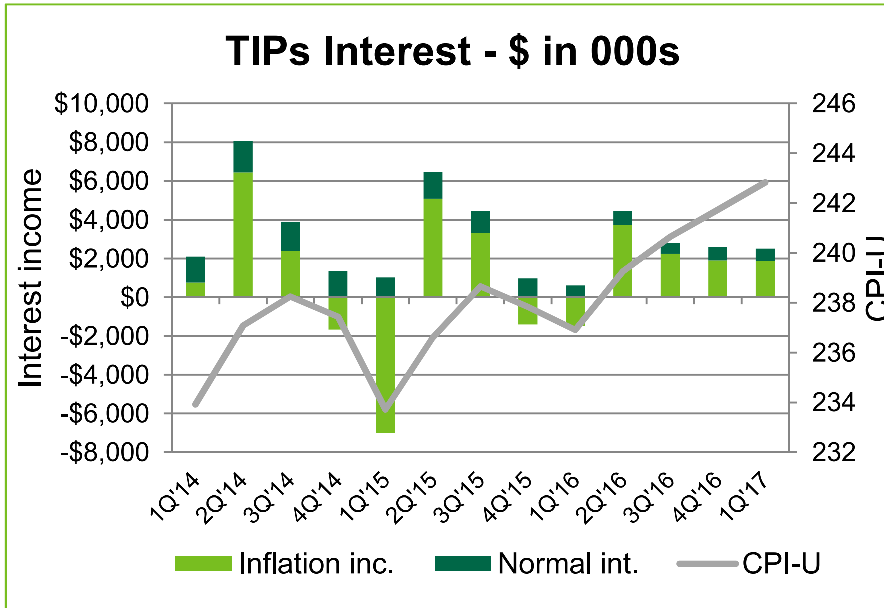


NET INTEREST INCOME: YTD – March 31, 2017



- TIPs inflation income was $1.9 million in both the current quarter and prior quarter, but negative ($1.5) million last year.
- Net interest income this quarter included one-time interest of $2.7 million from a private equity investment. Excluding this item lowers our net interest margin to 3.09%.
- Growth in net interest income results from higher loan balances, rates on commercial loans and higher inflation income this year.

Tax equivalent – YTD	2016	2017	Change
Rates earned – assets	3.10%	3.30%	0.20%
Rates paid – liabilities	0.23%	0.26%	0.03%
Net yield – earning assets	**2.95%**	**3.14%**	**0.19%**

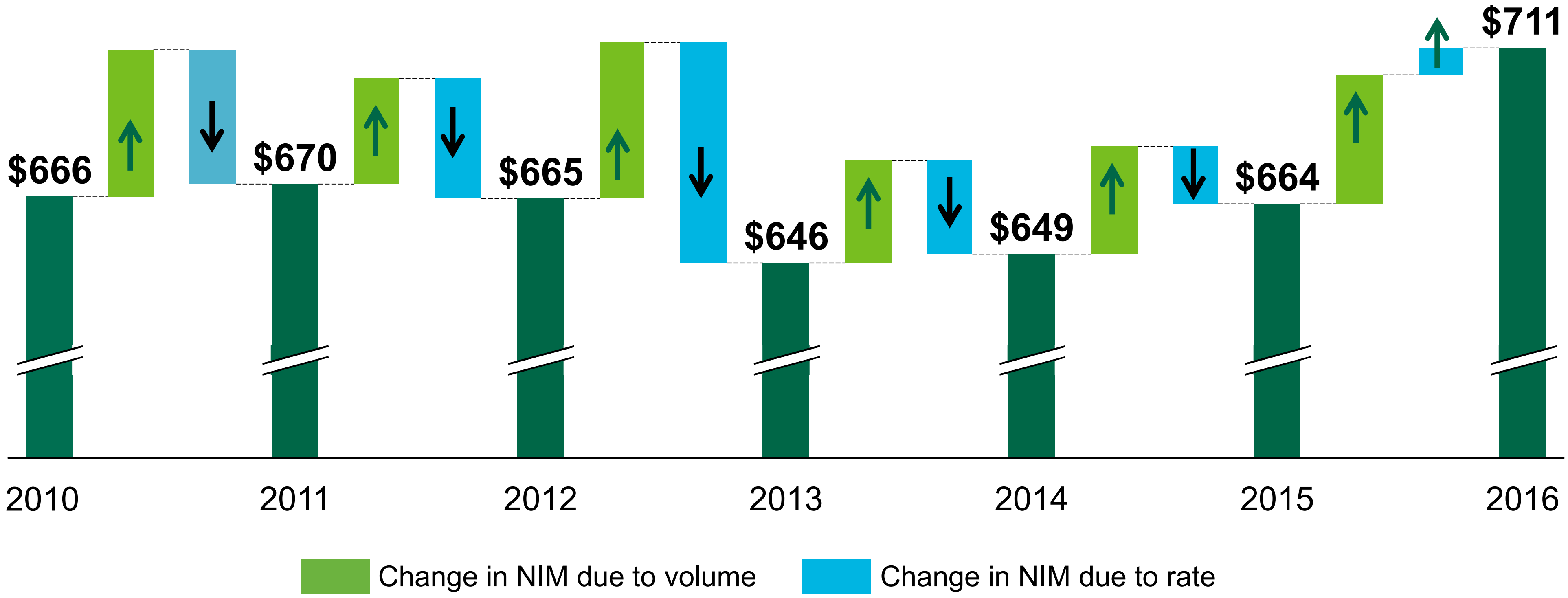


*Excludes inflation income on TIPs

Commerce Bancshares, Inc.

GROWTH IN VOLUME DRIVING $46million INCREASE IN NIM

Tax Equivalent Net interest Income: 2010 – 2016
$s in millions

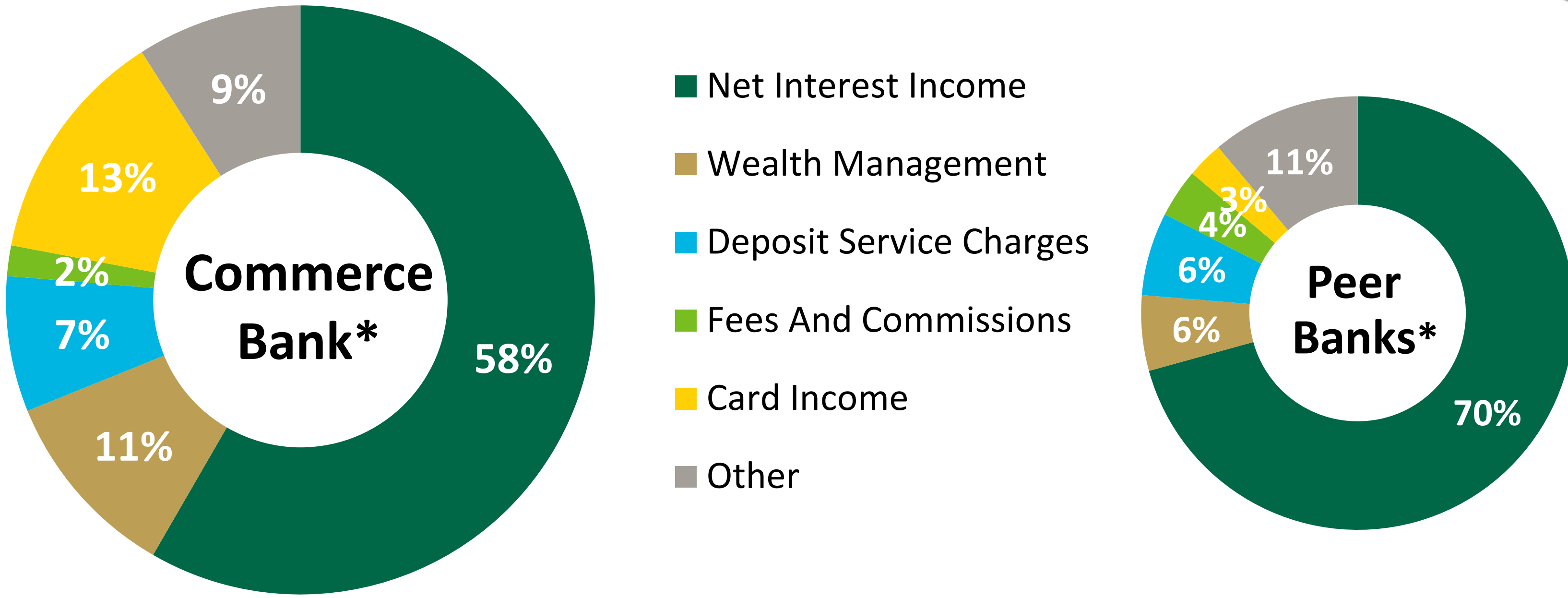


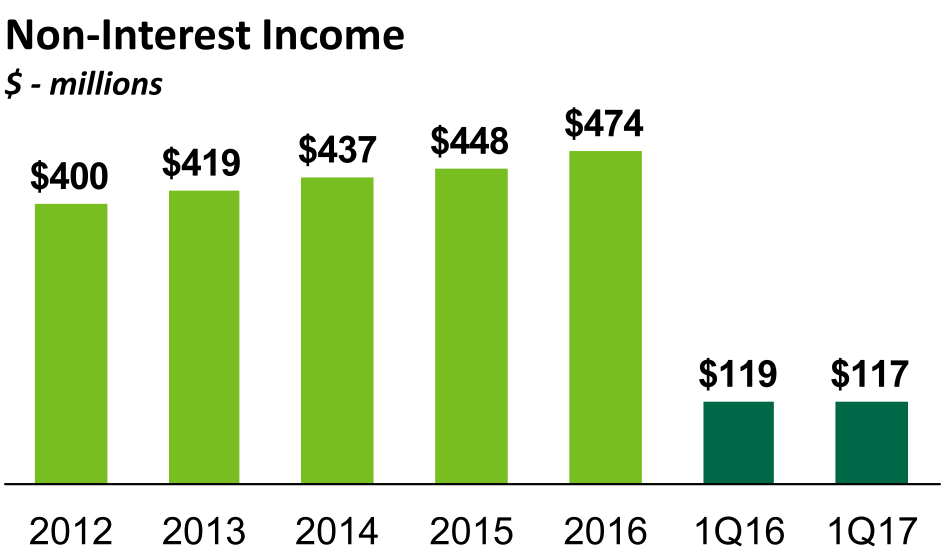
- Lower rates have been pushing the net interest margin lower since 2008
- A larger balance sheet mitigated some pressure from lower rates
- Looking forward, the net interest margin has room to expand when rates move noticeably

Commerce Bancshares, Inc.

FEE INCOME REACHES 42% OF TOTAL REVENUE

Balanced mix of interest and non-interest income





Continued focus on growing fee income through new and existing product and services offerings

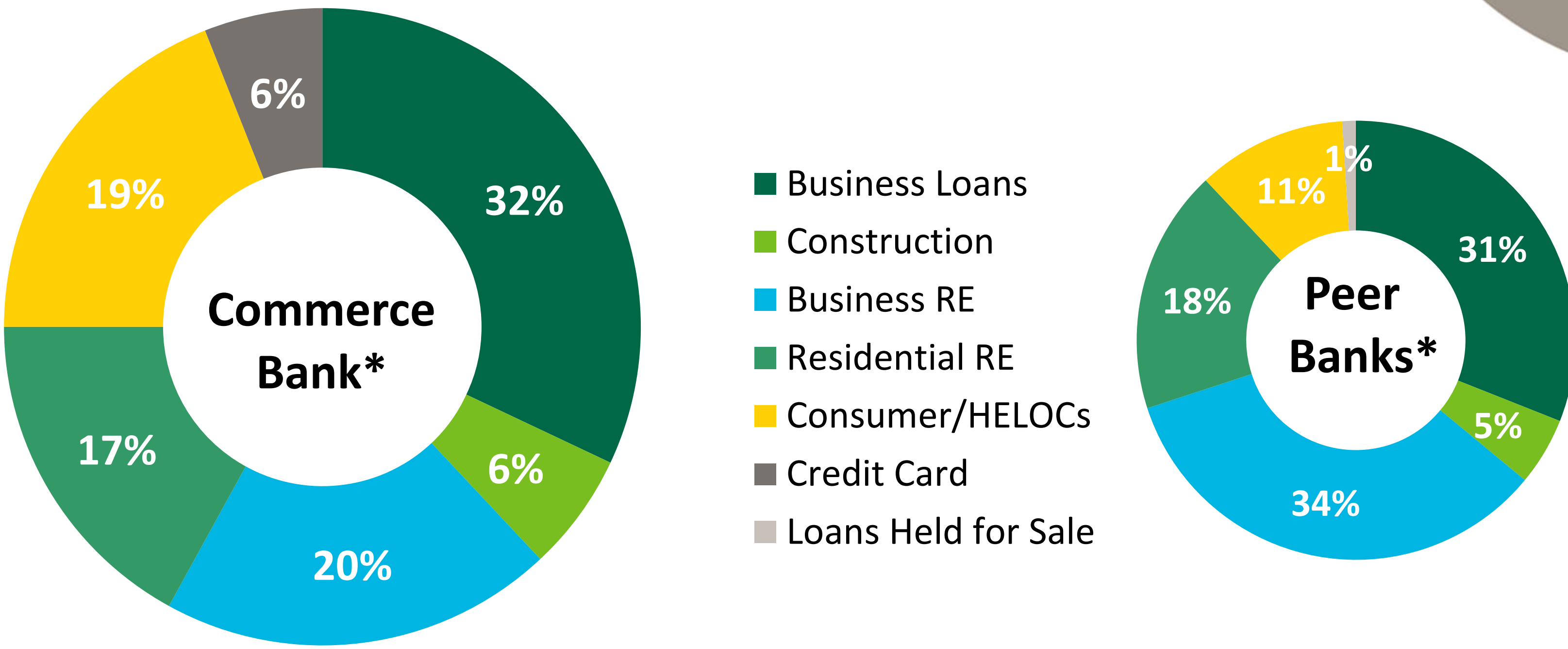
Examples:

- Toggle™
- Remitconnect™
- Supply chain finance
- Insurance claims payment processing
- Accounts Payable automation
- Swaps

Peer Banks include: ASB, BKU, BOKF, CFR, FHN, FNB, FULT, HBHC, IBKC, ISBC, MBFI, PB, SNV, TCB, UMBF, UMPQ, VLY, WBS, WTFC

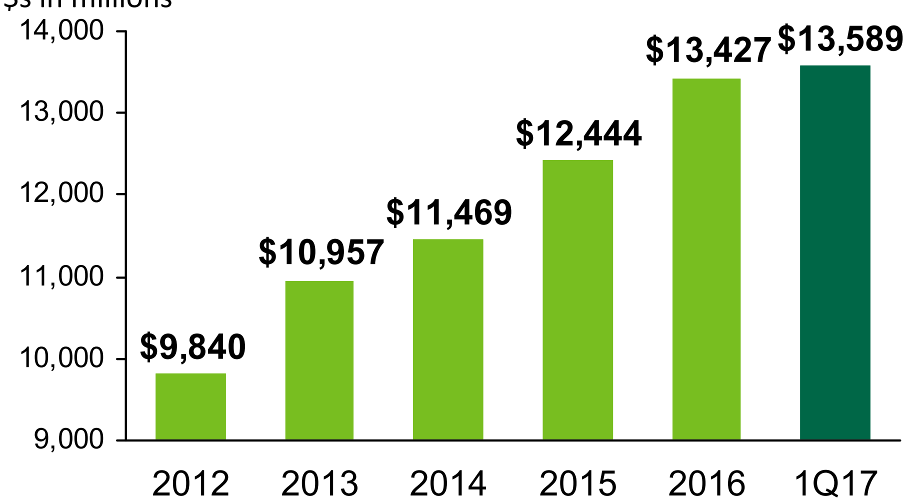
*Source: SNL & FIS as of 12/31/2016

WELL-DIVERSIFIED LOAN PORTFOLIO



Period End Loan Growth

$s in millions



Solid loan growth this quarter, 8% annualized, due mostly to higher commercial loan demand.

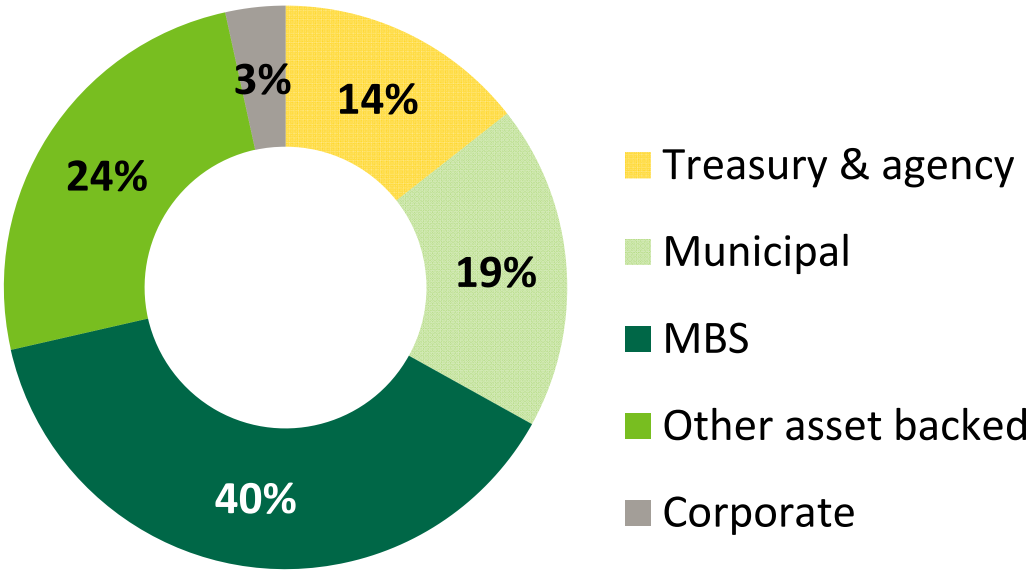
Business	**$175 million**
Business RE	**$87 million**
Personal RE	**$27 million**
All other consumer	**$24 million**

Period end December 31, 2016
Peer Banks include: ASB, BKU, BOKF, CFR, FHN, FNB, FULT, HBHC, IBKC, ISBC, MBFI, PB, SNV, TCB, UMBF, UMPQ, VLY, WBS, WTFC
*Source: Financial Information Systems data as of 12/31/2016

Commerce Bancshares, Inc.

INVESTMENT PORTFOLIO:
HIGH QUALITY, DIVERSE, SHORT DURATION

Composition of AFS Portfolio



AFS Portfolio as of 3/31/17

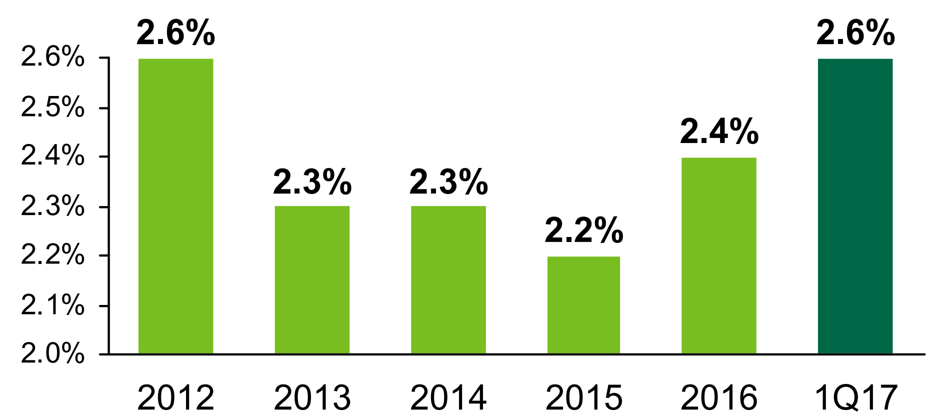
Total investments	$9.7 billion
Unrealized gain	$80 million
12 month maturities / pay-downs	$2.1 billion

Duration

December 2014	2.4 years
December 2015	2.9 years
December 2016	2.9 years
March 2017	2.9 years

March 31, 2017	Weighted Avg rate	Weighted Life (years)
Treasury & agency*	1.4%	3.9
Municipal - TE	3.7%	5.0
MBS	2.5%	3.7
Other asset-backed	1.7%	2.2
Corporate	2.5%	4.8

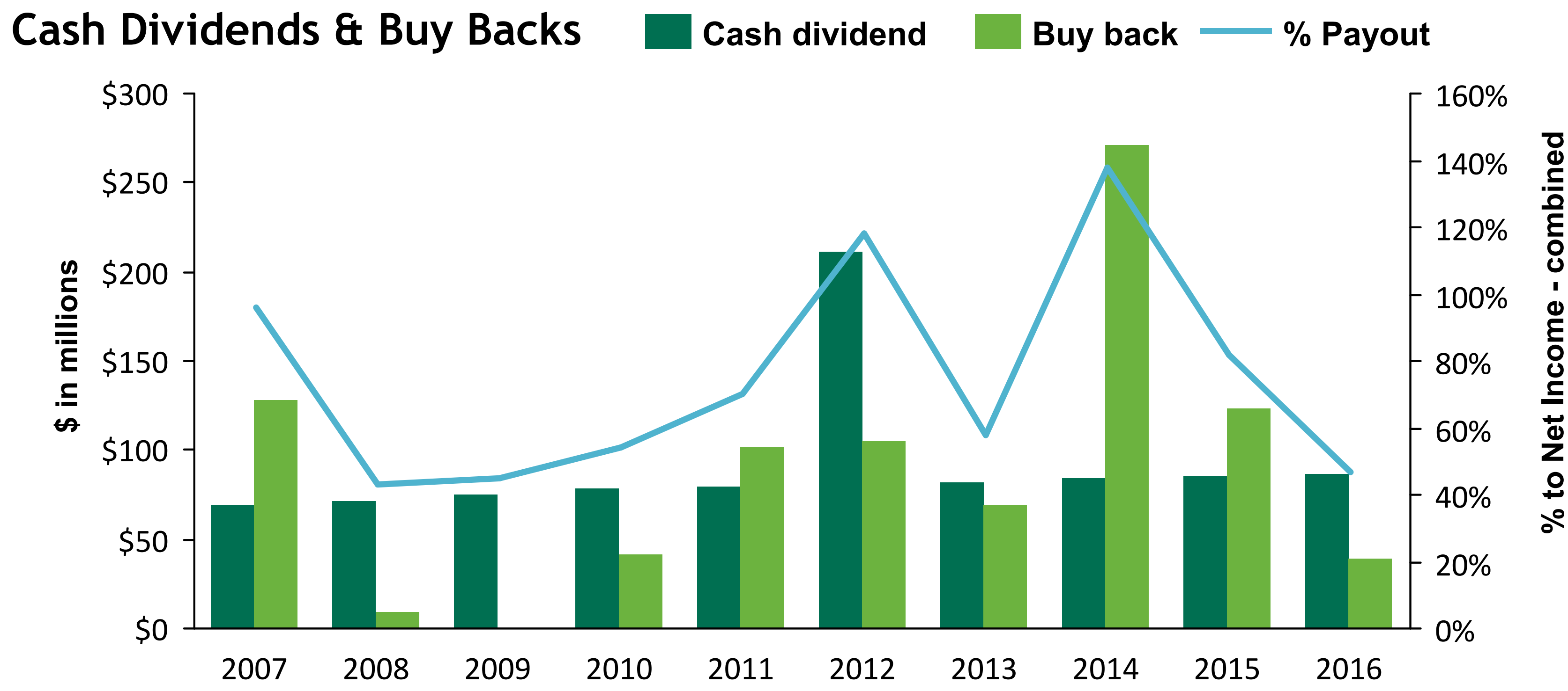
YTD TE Rate - Investments



*Excludes inflation effect on TIPs
Sources: InTrader, AFS portfolio

Commerce Bancshares, Inc.

STRONG CAPITAL POSITION
FLEXIBILITY IN CAPITAL PLANNING



Year-end capital ratios	
Tier 1 common risk-based capital	11.6%
Tier 1 risk-based capital	12.4%
Total risk-based capital	13.3%
Leverage ratio	9.6%

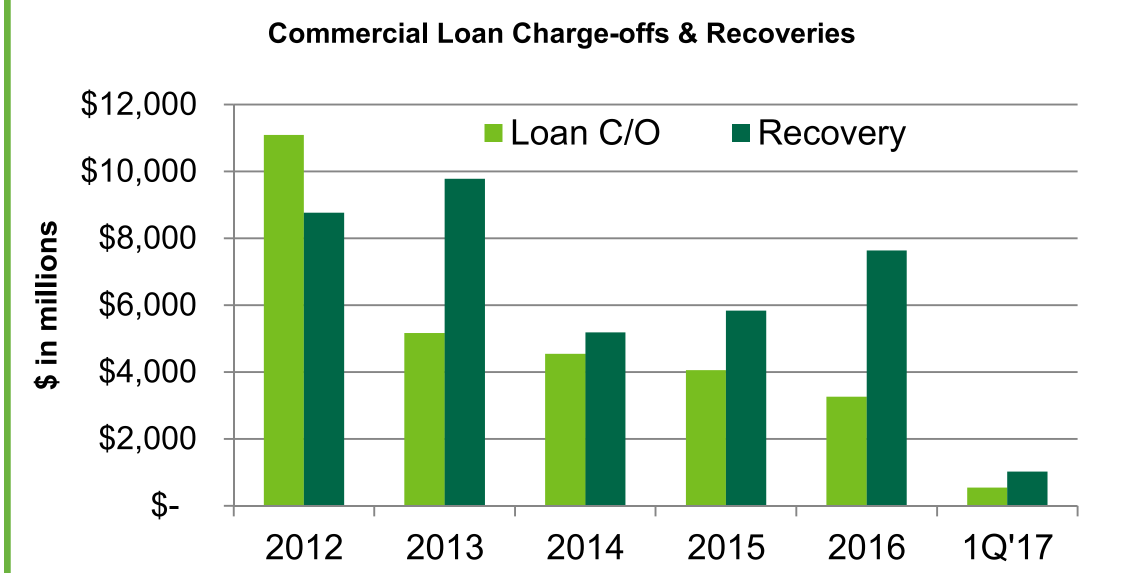
- ASR transactions totaled $200 million in 2014 and $100 million in 2015.
- Market transactions totaled $39 million in 2016.
- 2012 included a special cash dividend of $212 million.

Commerce Bancshares, Inc.

NET LOAN CHARGE-OFFS YTD – March 31, 2017

$ in 000s	YTD 2016	YTD 2017	$ Chge	'17 Loss Rate
Business	$ 463	$ 97	$ (366)	0.01%
Overdraft	219	435	216	42.15%
Construction	(11)	(353)	(524)	-0.26%
Business R/E	(242)	(39)	203	-0.01%
Personal R/E	(195)	19	214	0.00%
Consumer	2,599	2,096	(503)	0.43%
HELOC	88	7	(81)	0.01%
Credit Card	5,918	7,148	1,230	3.88%
Total	$ 8,839	$ 9,228	$ 389	0.28%

- Higher credit card loss rates this year reflect growing delinquencies over the last several quarters. Staffing with more collectors should help to address higher losses.
- Non-accrual loans at very low levels - 0.11% of total loans



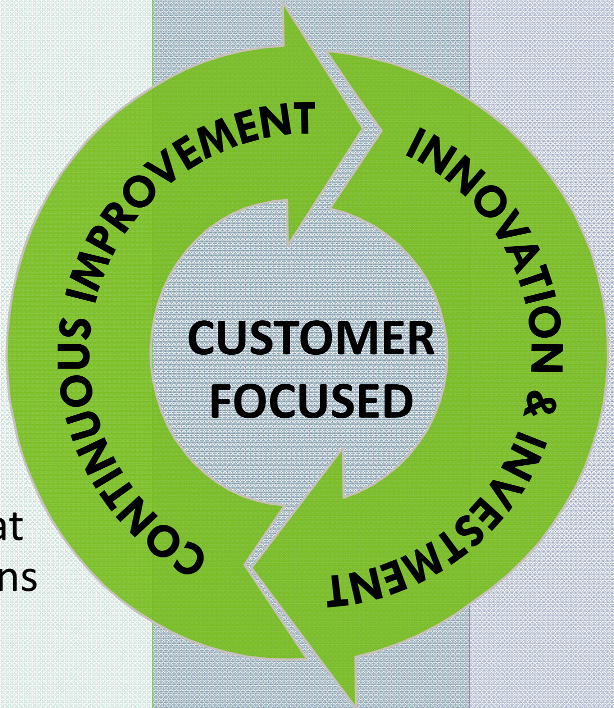
$ in 000's	2016	2017
Non-accrual loans	$ 29,367	$ 14,803
Foreclosed assets	1,997	387
	$ 31,364	$ 15,190

Commerce Bancshares, Inc.

MAINTAINING THE BALANCE

Strong performance; ongoing refinement of the "Core Bank"

- Super-Community Bank platform
- Relationship-based banking
- High-touch customer service
- Full suite of product and service offerings
- Disciplined attention to risk return
- Divest in businesses & activities that no longer provide acceptable returns
- A highly engaged workforce
- Focus on profitability and shareholder return

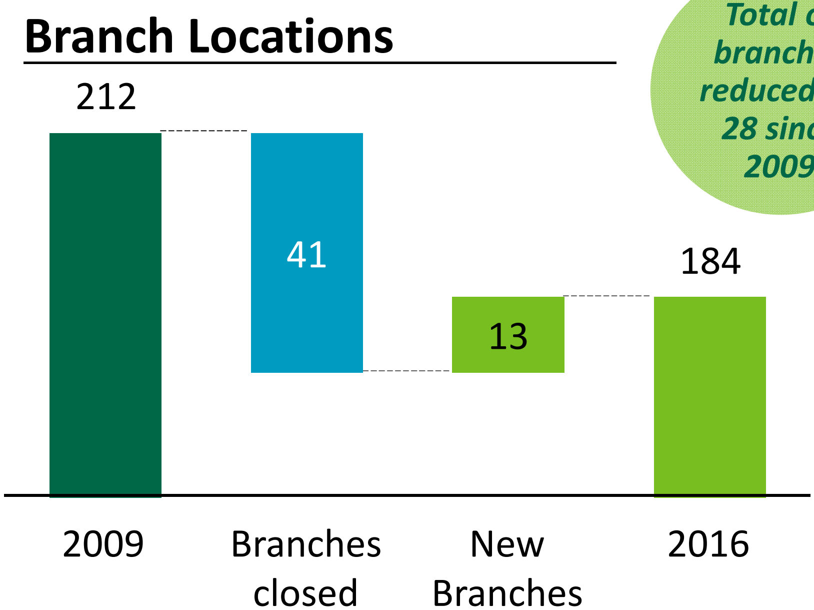


Disciplined focus on priority blue chip investments

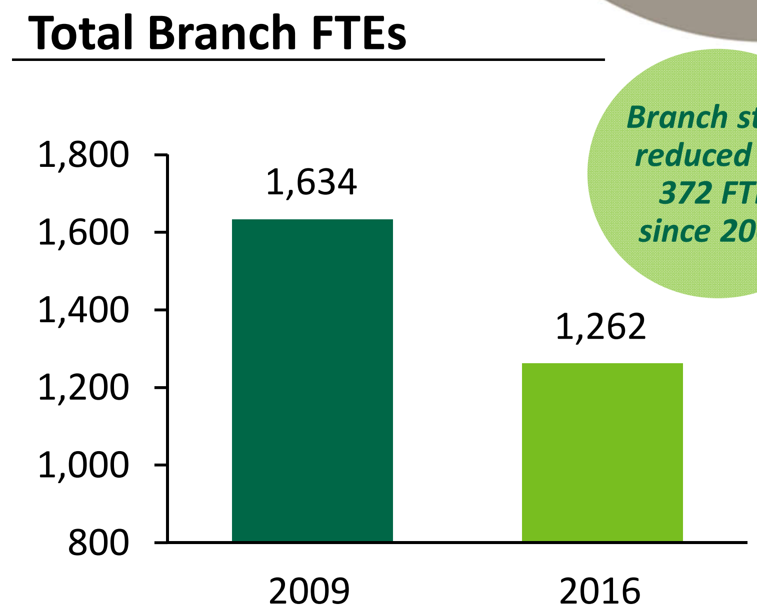
- Funding Future Growth
- Expansion Market Growth
- Transform the Retail Model
- Enhance Private Client Model
- Health Services Financing
- Claims Payments
- Supply Chain Finance
- Commerce Bank Mortgage
- Enterprise CRM
- Succession Planning

THE Commerce EDGE …emphasis on culture, collaboration & core values

TRANSFORMING THE RETAIL MODEL

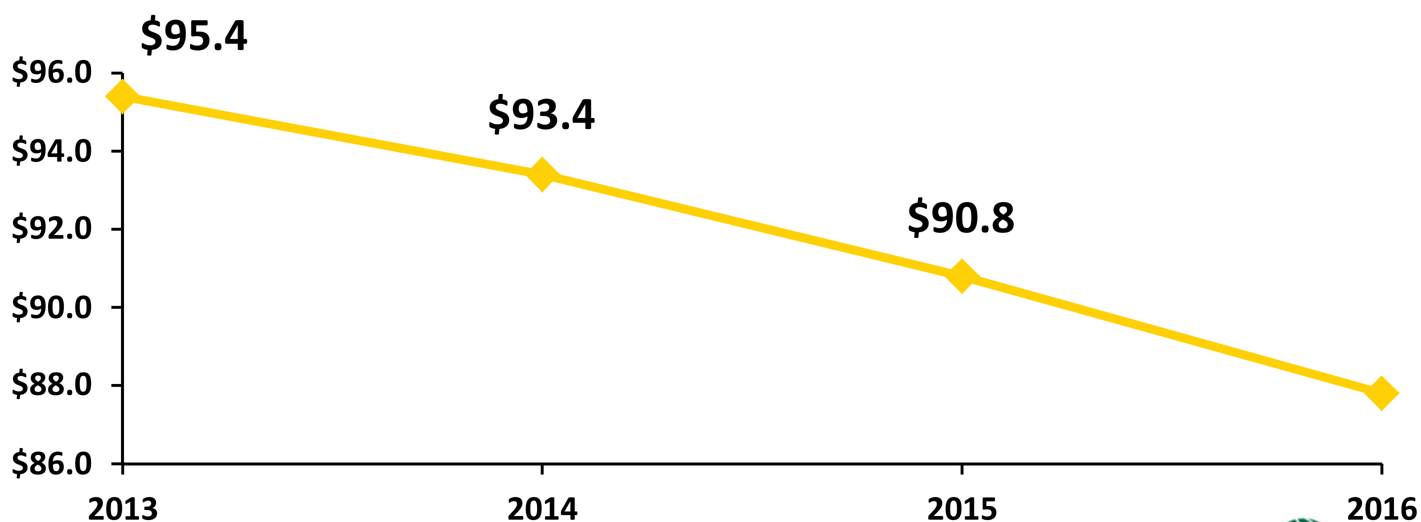


Total of branches reduced by 28 since 2009



Branch staff reduced by 372 FTE since 2009

Branch expense
$s in millions



Expense reduction efforts continue

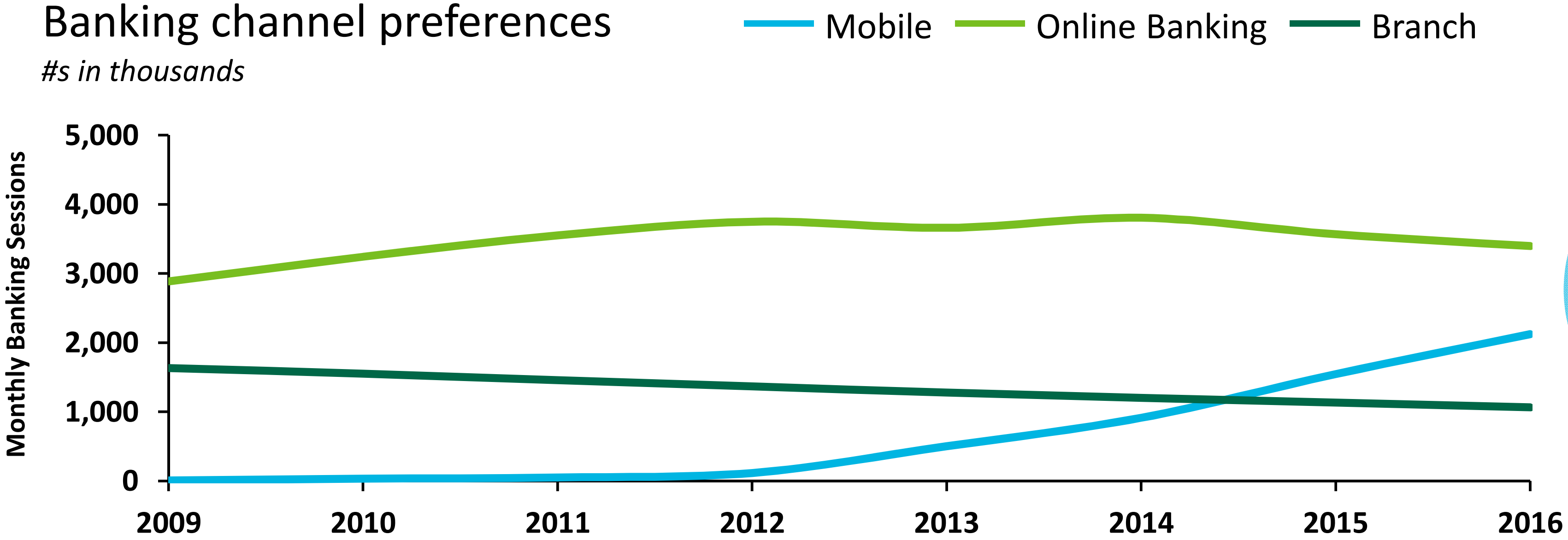
Nearly $17 million in savings since 2009.

Commerce Bancshares, Inc.

TRANSFORMING THE RETAIL MODEL

Banking channel preferences

#s in thousands



Customer channel preference shifting to mobile

Key retail objectives

- Grow priority segments
- Invest in digital channels / Improve digital sales & client experience
- Develop new fee income programs
- Develop innovative product offerings and marketing approaches

Grow Revenue

Optimize Cost

Retain Customer and Employee Engagement

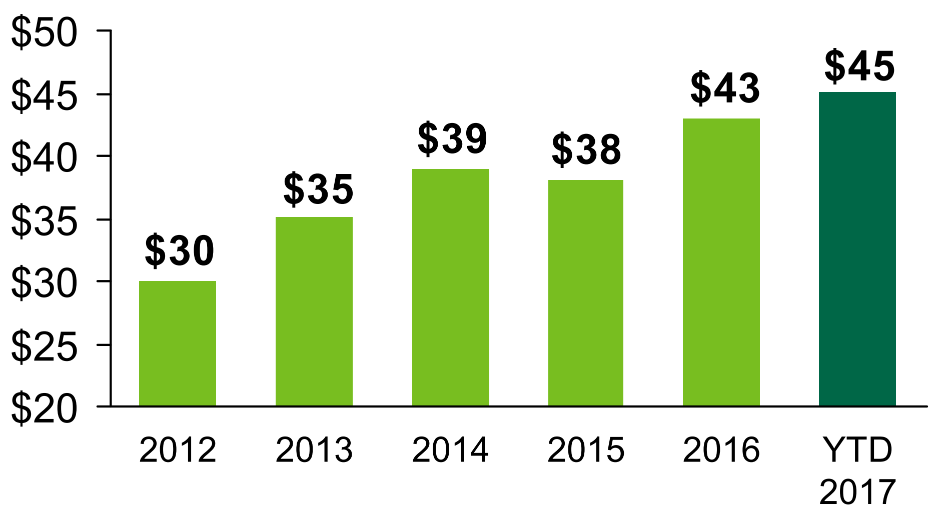
Commerce Bancshares, Inc.

The Commerce Trust Company
A division of Commerce Bank

For high net worth individuals who are looking to simplify their complex financial life, The Commerce Trust Company provides a full-service approach to wealth management.

- **$44.5 billion** in total client assets[1]
- **$26.7 billion** in assets under management
- **22nd largest bank-owned Trust Company** in the United States[2]
- **Record sales in Asset Management up 7% over prior year**

Trust Assets
$s billions



Key Priorities

- Enhanced Private Client model
- Asset Management sales growth
- Institutional Trust Asset Management sales growth
- Implement Marketing strategies
- Enhanced sales partnerships from Commercial & Retail channels

[1]Assets under Administration
[2]SNL Ranking as of 12/31/2016

A Full Spectrum of Planning Solutions

Core Private Client

Commerce Family Office

New Private Client Delivery Model

- Scenario Plans
- Modular Solutions
- Topical tools and information

Financial Advisory Services

- Comprehensive & Continuous Financial Planning

Family Wealth Stewardship

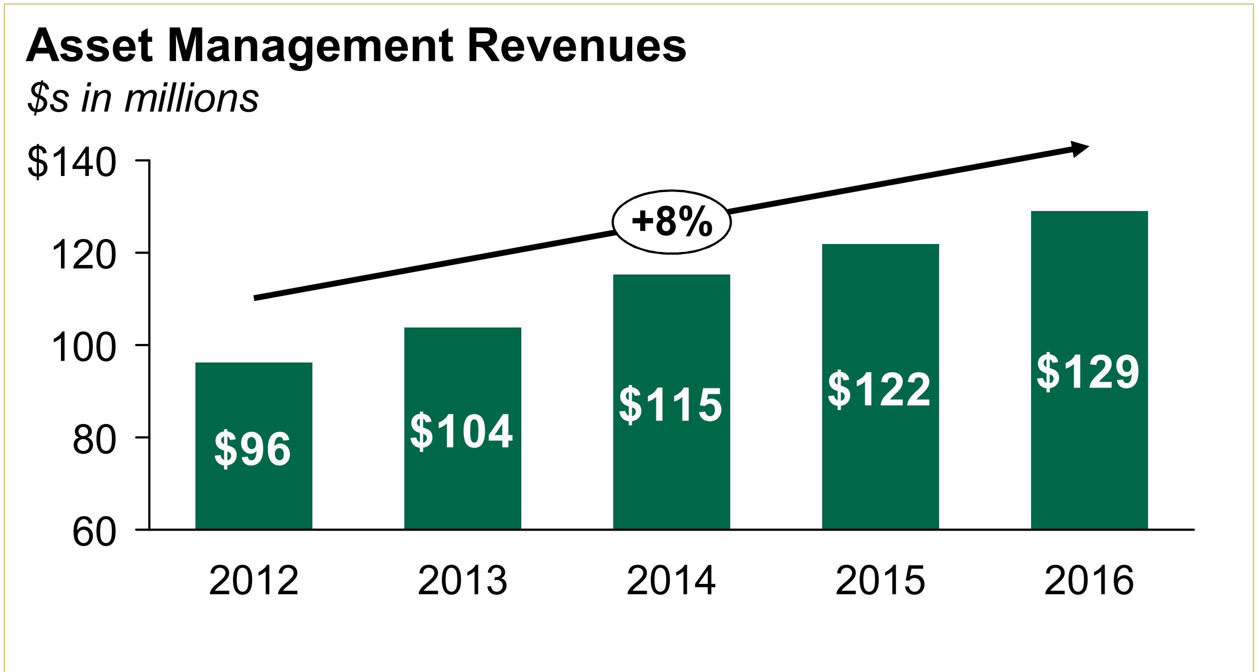
- Family Mission Statement
- Wealth Education
- Philanthropic Planning

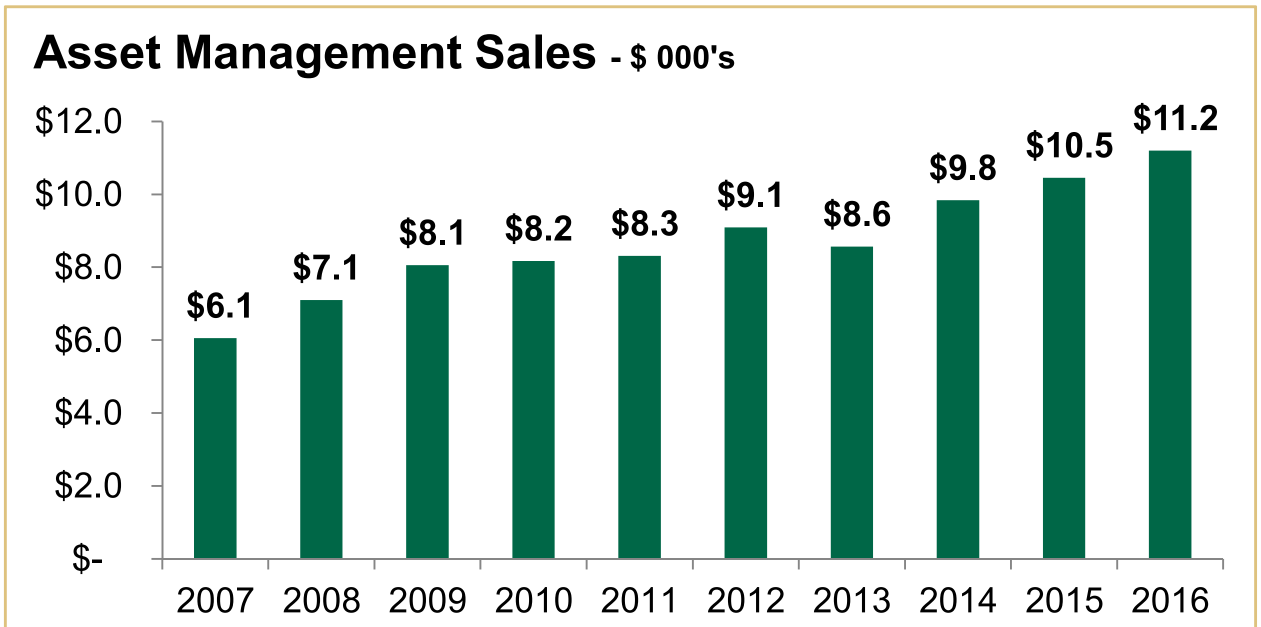
Client RM

FAS Planner

CFO Team

TRENDS IN TRUST REVENUE AND SALES





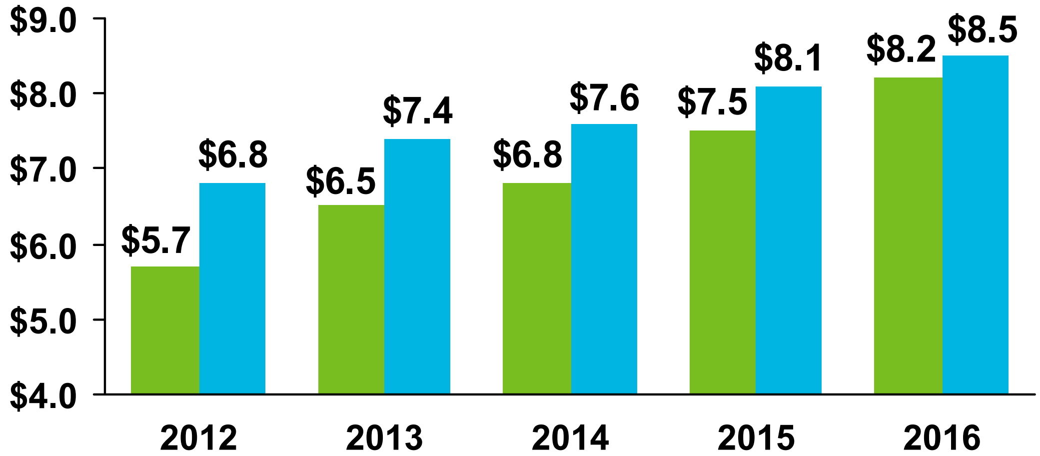
- Solid growth in fee continues; profit margins reach 40% in 2016.
- Attrition rates remain below industry results.
- Demand continues for asset management services.
- Record sales of $11.2 million achieved in 2016.

Commerce Bancshares, Inc.

COMMERCIAL – REVENUE GROWTH OPPORTUNITIES

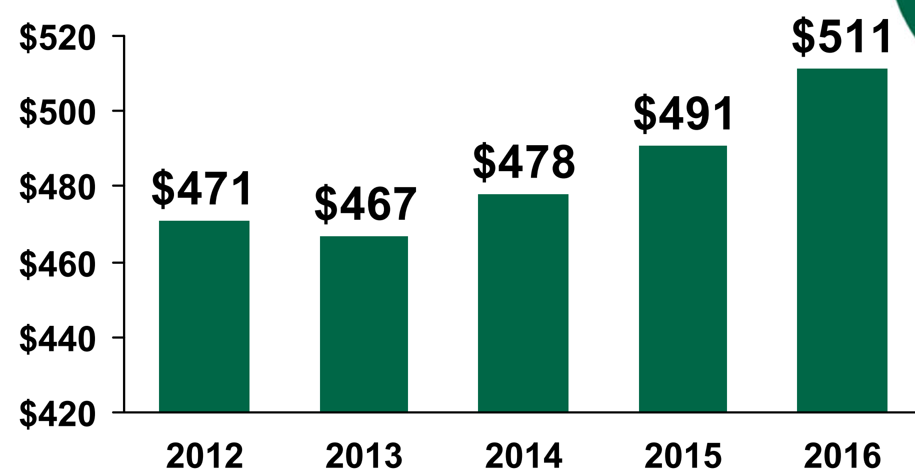
Commercial Banking - Total Loans and Deposits

$s in billions **Loans** **Deposits**



Commercial Banking Revenue

$s in millions

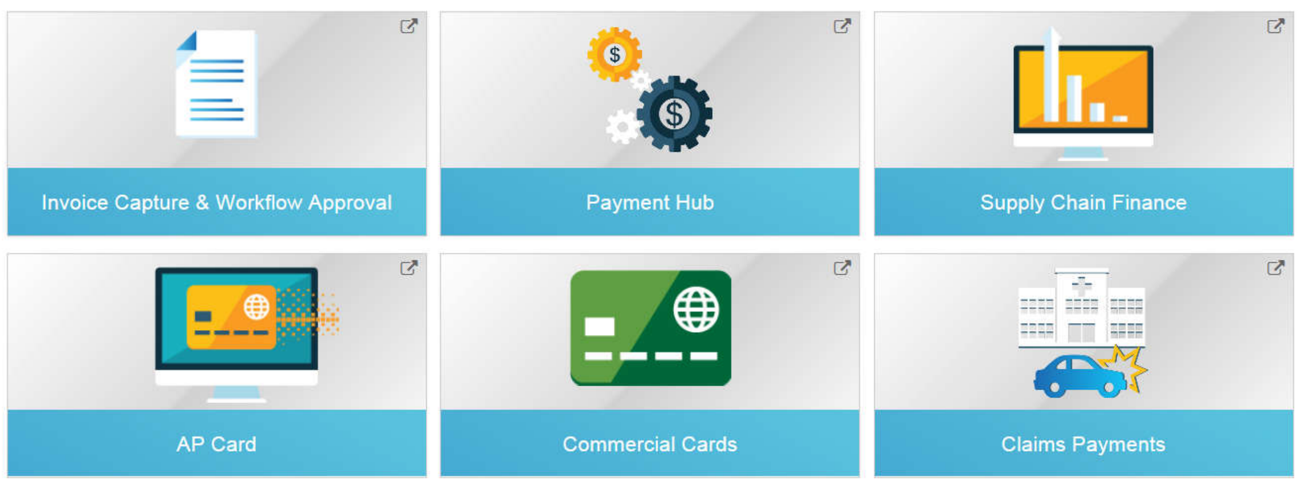


Key Priorities:

- Build out capabilities in Expansion Markets
- Refine Healthcare Banking strategy
- Embrace innovation in the Payments Systems

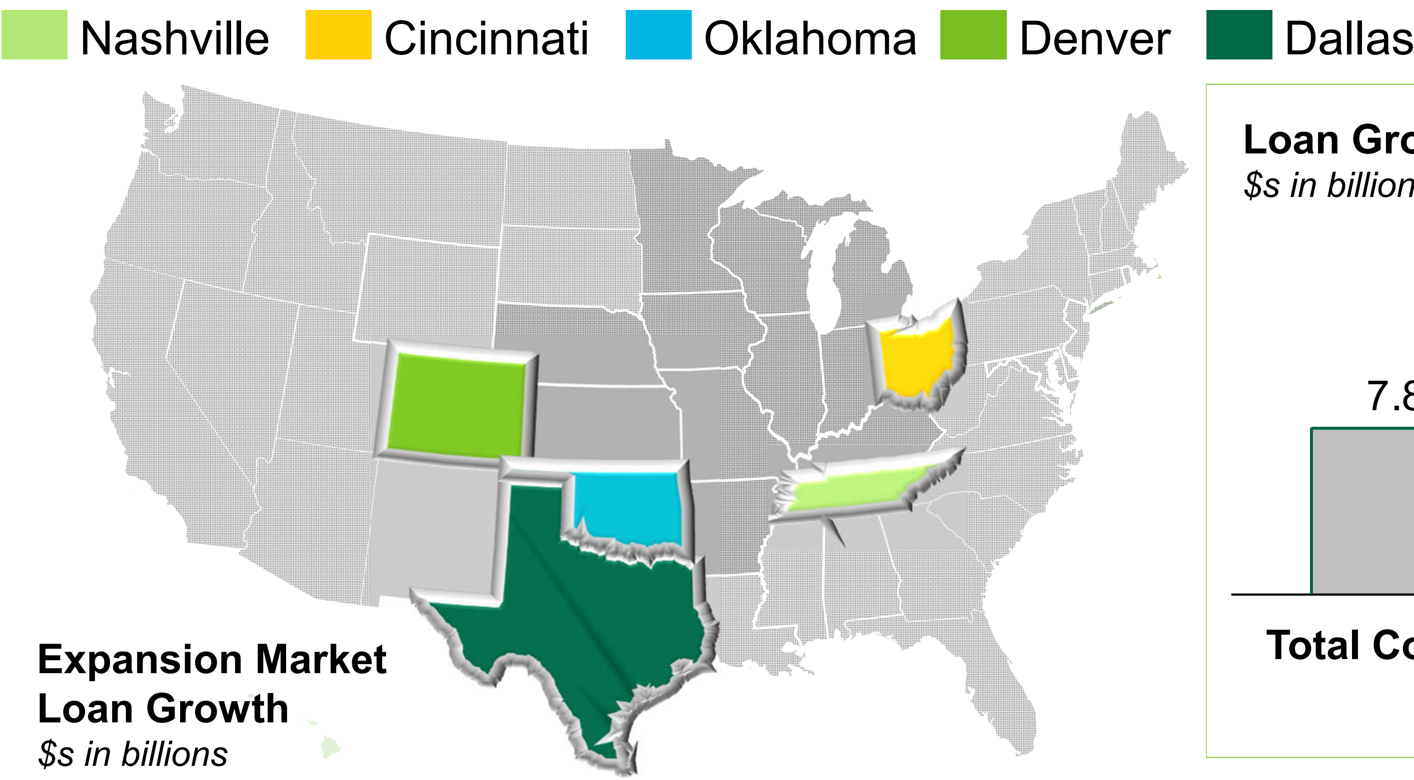
EMBRACING INNOVATION IN THE PAYMENTS SYSTEMS

Our full suite of products and services brings real value to client relationships

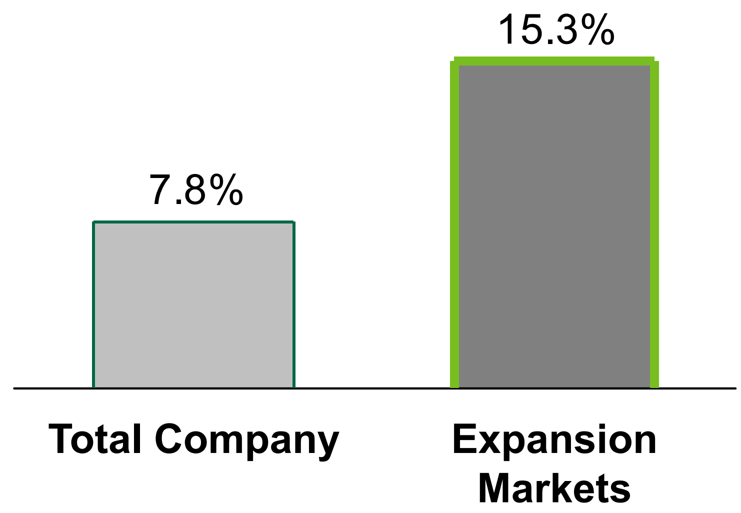


Commerce Bancshares, Inc.

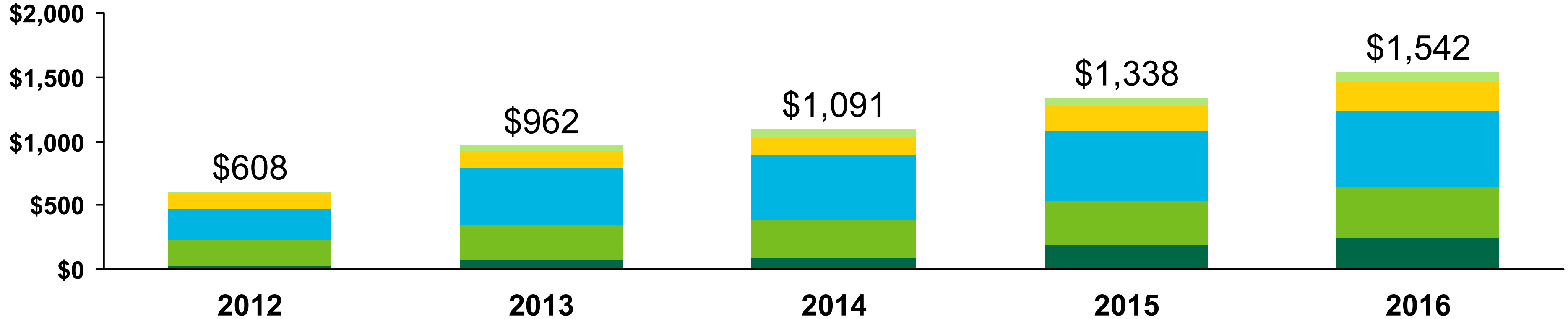
COMMERCIAL BANKING – EXPANSION MARKETS



Loan Growth 2016 vs 2015
$s in billions



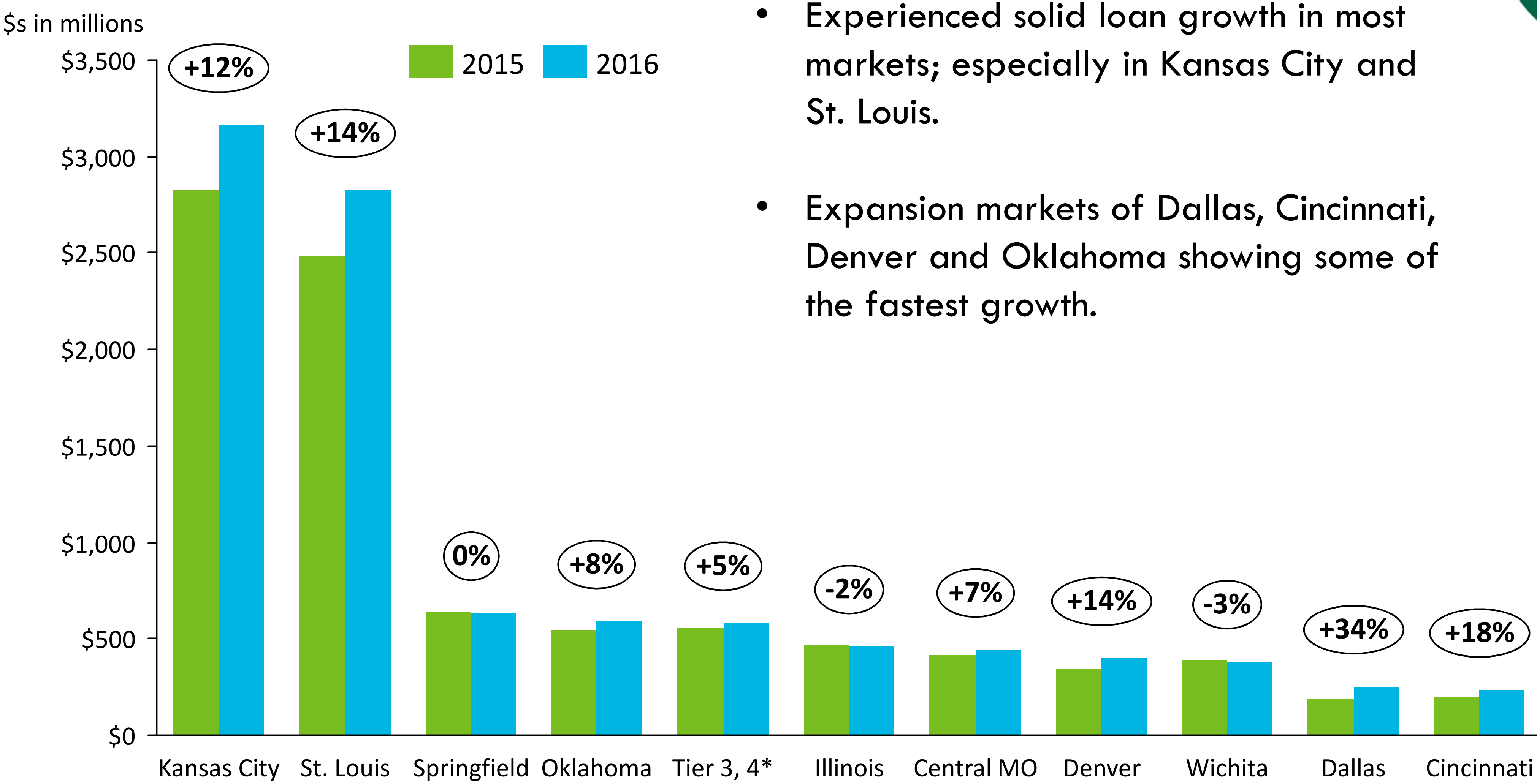
Expansion Market Loan Growth
$s in billions



EXPANSION MARKETS OFFERING GROWTH OPPORTUNITIES

Period end balances

LOAN GROWTH REMAINS STRONG IN MOST MARKETS



- Experienced solid loan growth in most markets; especially in Kansas City and St. Louis.
- Expansion markets of Dallas, Cincinnati, Denver and Oklahoma showing some of the fastest growth.

*Includes MOKAN, Garden City, SEMO, Manhattan and Hays

CARD PRODUCTS – A LEADER AMONGST U.S.BANKS

CONSISTENTLY RANKED AMONG THE TOP ISSUERS IN THE NILSON REPORT

Commercial Card Issuer	Purchasing Card Issuer	Bank Acquirer	Consumer Card	Debit Card	Prepaid Card
#11	#7	#10	#13	#19	#13

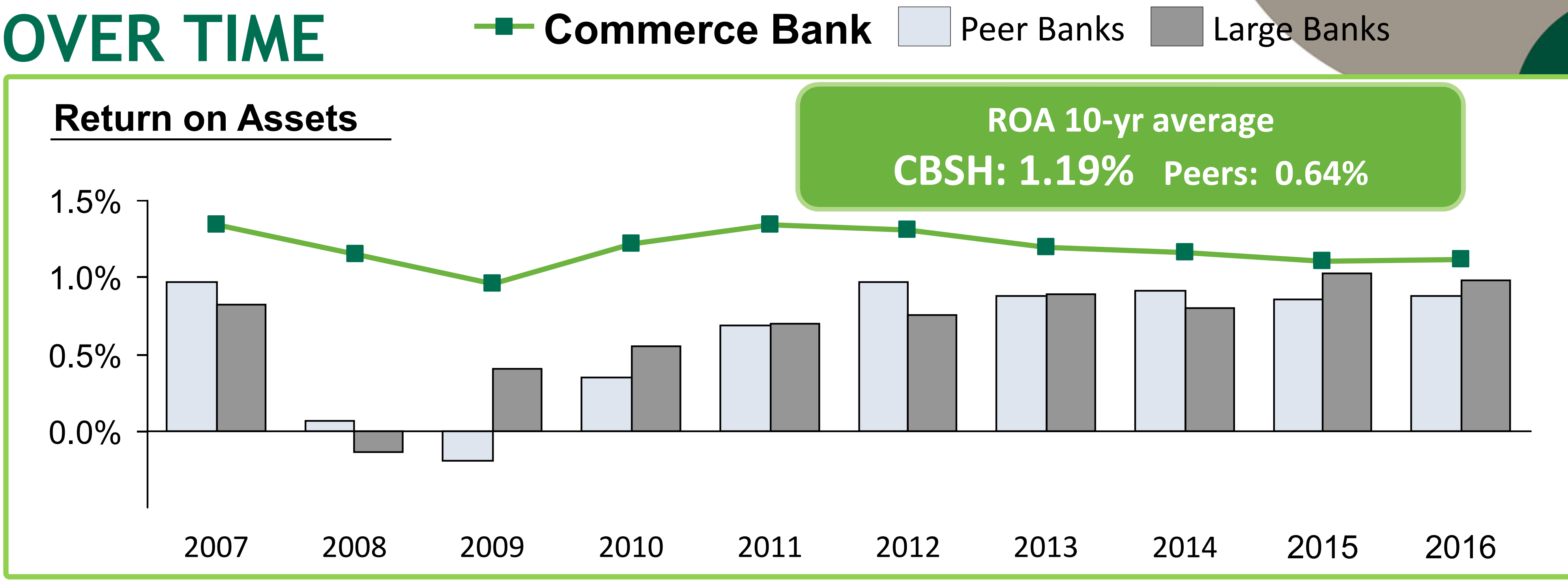
A FULL SUITE OF INNOVATIVE CARD AND PAYMENT PRODUCT OFFERINGS

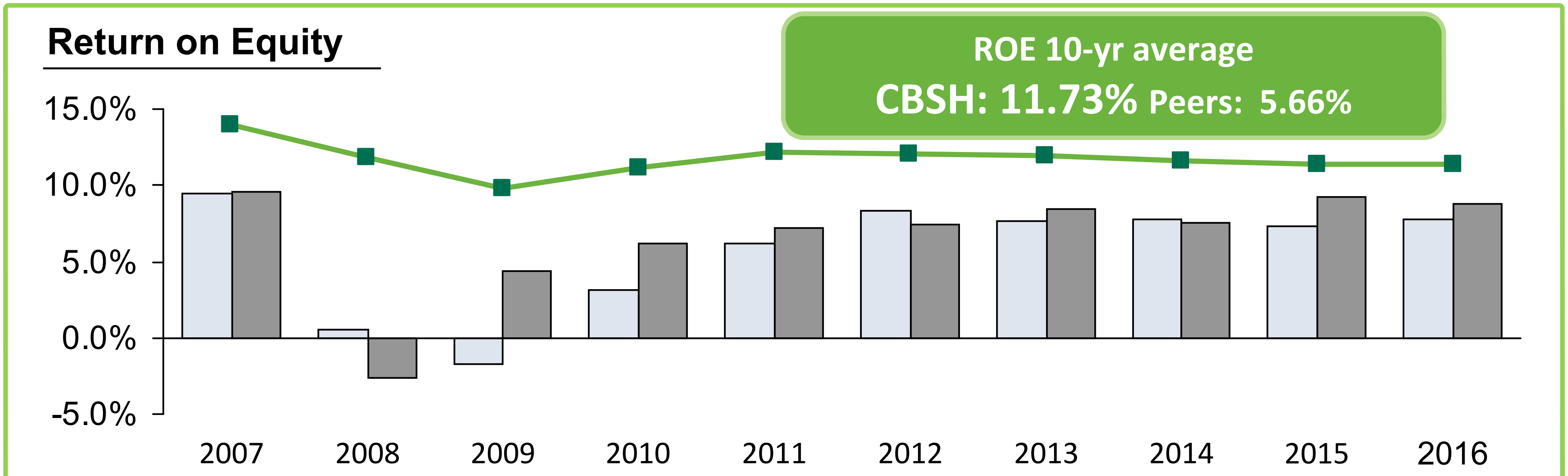
- *Supply Chain Finance*
- *Health Services Financing*
- *Claims Payments*
- *Multi Account Chip*
- *Co-Brand*
- ***toggle®***
- *Prepaid Expense*

Source: Nilson Reports (Debit: April 2016; Consumer Card: February 2016; Prepaid: July 2016; Merchant: March 2016; Purchasing: June 2016; Commercial Card June 2016), based on the top 50 U.S. banks ranked by total assets as of 12/31/2016, SNL Financial

Commerce Bancshares, Inc.

COMMERCE BANK MAINTAINS SOLID PERFORMANCE OVER TIME



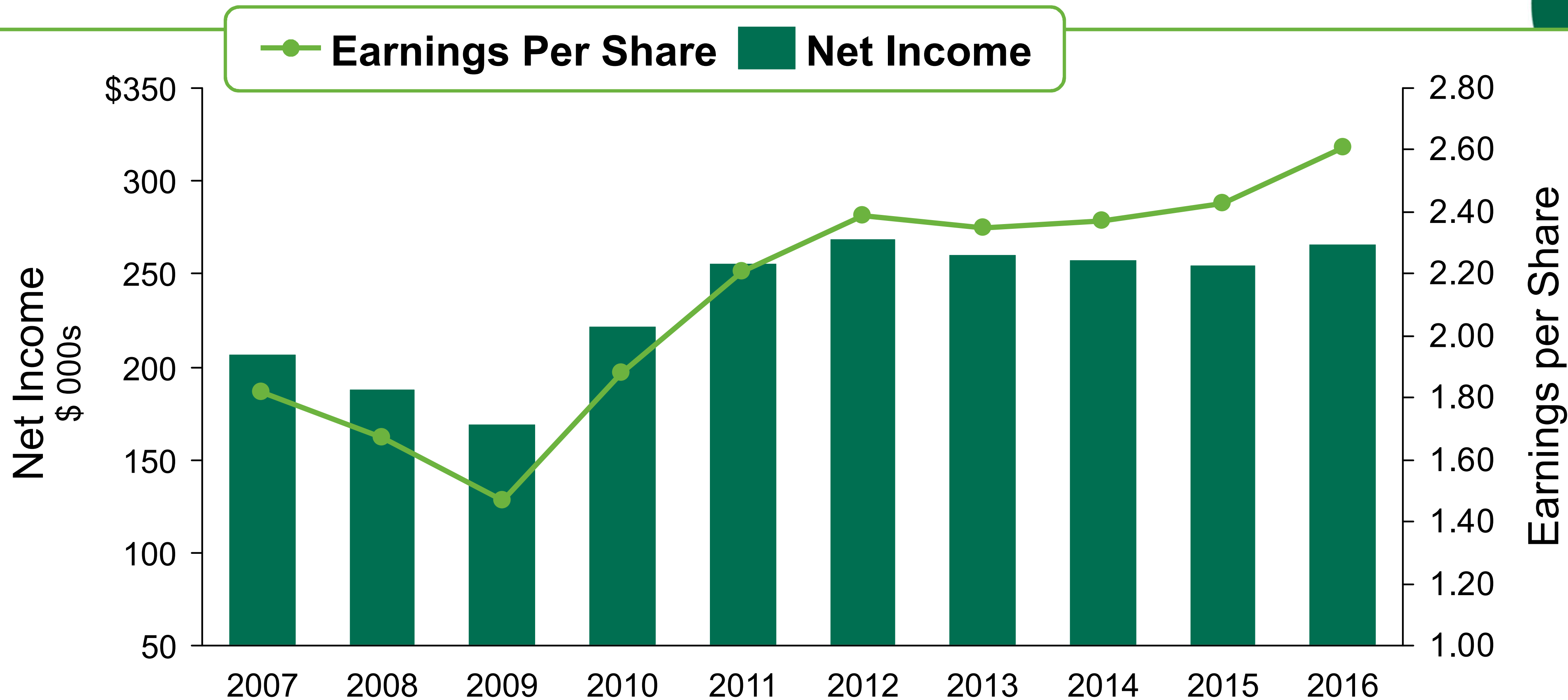


Peer Banks include: ASB, BKU, BOKF, CFR, FHN, FNB, FULT, HBHC, IBKC, ISBC, MBFI, PB, SNV, TCB, UMBF, UMPQ, VLY, WBS, WTFC; Large Banks include: JPM, BAC, C, WFC USB, PNC, FITH, RF

Source: SNL Financial; data as of 12/31/2016; CBI 2015 & 2016 numbers via internal reporting

Commerce Bancshares, Inc.

LONG TERM VIEW: NET INCOME AND EARNINGS PER SHARE



Dividends per share	$0.61	$0.65	$0.65	$0.67	$0.69	$0.72*	$0.74	$0.78	$0.82	$0.86

2017 MARKS THE 49TH CONSECUTIVE YEAR OF DIVIDEND GROWTH

*Including 2012 special dividend = $1.90
All data has been restated for 5% stock dividend distributed in December 2016
Source: Corporate Finance

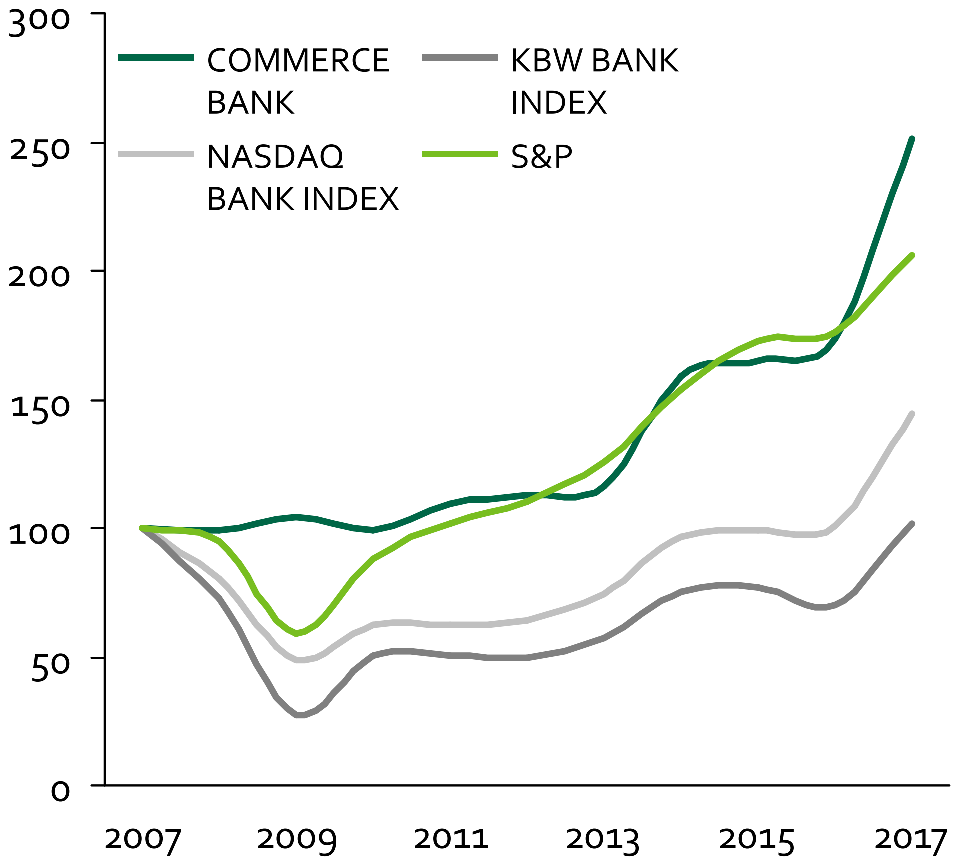
Commerce Bancshares, Inc.

STEADY SHAREHOLDER RETURNS

(as of March 31, 2017)

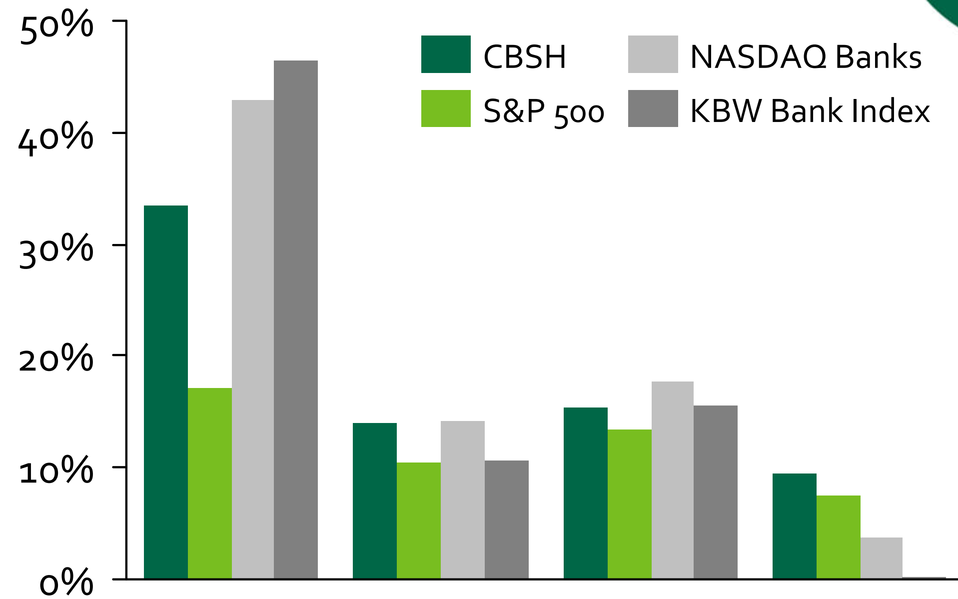
Total Shareholder Returns

Indexed, 03/31/2007 = 100



Annualized Comparison Total Shareholder Returns

Percent



	1 Year	3 Year	5 Year	10 Year
	33.41%	14.02%	15.27%	9.43%
	17.16%	10.36%	13.29%	7.51%
	42.87%	14.19%	17.72%	3.74%
	46.43%	10.71%	15.49%	0.20%

Consistent, positive returns to shareholders
Significant outperformance relative to banks over long period

Source: Bloomberg; data as of 03/31/2017

Commerce Bancshares, Inc.