

# Carbon Footprint Management (CFM) Plan 2024



The *Carbon Footprint Management (CFM) Plan* of Komerční banka, a.s. provides the basis for measuring, monitoring, and reducing the carbon footprint. Offering an overview of greenhouse gases generated by the company's operations, both directly and indirectly, it sets out a plan for managing and reducing these greenhouse gases over the next few years. The company wants to reduce its environmental impact over the long term through this plan.

The plan includes a procedure for managing the company's carbon footprint, targets for CO<sub>2</sub> emission reductions, and an action plan for achieving such objectives within a specified period. In addition, the plan evaluates processed data quality and data collection methods and presents specific points that can be gradually improved in this respect.

**The carbon footprint** is a measure of the impact of human activities on the environment and the climate change. Almost every activity, ranging from transport to food, releases greenhouse gases (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>), directly or indirectly. The carbon footprint is the amount of these gases. It is a tool for measuring human activities' environmental impact expressed in tonnes of carbon dioxide equivalent (tCO<sub>2</sub>e). Simply put, the carbon footprint is the amount of carbon dioxide and other greenhouse gases released during the lifecycle of a product or service, our life or one journey, etc. The carbon footprint is one of the key indicators of sustainable development.

Under the GHG Protocol, the emissions produced by the company are divided into three parts: Scope 1, Scope 2, and Scope 3. The GHG Protocol is currently a widely used standard.

**Scope 1** (direct emissions) are activities that come under and are controlled by the company. Such direct emissions from activities are released directly into the air. These include, for example, emissions from boilers or generators burning fossil fuels in the company, emissions from mobile sources (such as cars) owned by the company or emissions from industrial processes, emissions from waste processing or wastewater treatment in facilities operated by the company.

**Scope 2** (indirect emissions from energy) are emissions associated with the consumption of energy bought (electricity, heat, steam or cooling), which do not arise directly in the company, but are the result of the company's activities. These are indirect emissions from sources that the company controls indirectly, yet it has a major impact on their amount. If the company itself produces electricity/heat and sells it to other customers or if it sells the purchased electricity/heat to other customers (e.g. tenants) and the amount of this electricity is measured, it is deducted from the total emissions in Scope 2.

**Scope 3** (other indirect emissions) are emissions that result from the company's activities and originate from sources not controlled or owned by the company, but are not classified as Scope 2 (e.g. business trips by air, waste land-filling, purchase and haulage of material by a third party). The definition implies that this is the broadest and, logically, least precisely defined category. While Scope 1 and Scope 2 emissions are well comparable between companies, Scope 3 emissions are comparable only to a limited extent.



The most common greenhouse gas is carbon dioxide (CO<sub>2</sub>), which is also calculated in this *Carbon Footprint Management (CFM) Plan*. Other greenhouse gases are included in the measurement and calculation indirectly, by conversion via the emission factor to CO<sub>2</sub> equivalent.

This CFM plan includes the company's processes, the targets for reducing greenhouse gas emissions, and an action plan to achieve this reduction over time. Furthermore, the plan evaluates the quality of the data needed for the calculation and the data acquisition methods, and identifies points that can be improved over time. The CFM plan uses an operational method of obtaining, evaluating, and reducing carbon footprint values.

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## 1. Corporate policy on climate change

Prague, 26 February 2024

**Komerční banka, a.s.** will assume responsibility for its business and production practices and for CO<sub>2</sub> emissions resulting from these activities. This responsibility will be exercised through the following guidelines:

Komerční banka, a.s. will make efforts to mitigate the climate change.

- Komerční banka, a.s. will seek to reduce annual greenhouse gas emissions by eliminating unnecessary emissions, improving energy efficiency, and maintaining climate responsibility through its actions. This will improve the company's carbon footprint.
- Komerční banka, a.s. will ensure that related business activities, such as sourcing or transport, are consistent with the intentions set forth herein.
- Komerční banka, a.s. will seek solutions, both in-house and those for clients, leading to meaningful investments resulting in a reduction of greenhouse gas emissions.
- Komerční banka, a.s. will introduce a system for annual monitoring and reporting of greenhouse gas emissions. This system must be consistent, accurate, and transparent.
- Komerční banka, a.s. will clearly communicate its corporate policy, emission reduction targets, and achieved reductions.
- Komerční banka, a.s. will seek to involve its trade partners, customers, suppliers, and employees in positive climate behaviour.
- Komerční banka, a.s. will seek to annually improve the calculations of its carbon footprint, and obtain the most accurate source data for this calculation.
- Komerční banka, a.s. seeks carbon neutrality of its activities through reducing GHG emissions and offsetting by 2026.
- Komerční banka, a.s. seeks carbon neutrality of its value chain (Scope 3 GHG emissions) through reducing GHG emissions and offsetting by 2050.

**Jan Juchelka**

Chairman and CEO

**Jitka Haubová**

On the Board of Directors



## 2. CFM system (Directive)

Our carbon footprint management system is explained in the following:

- i. **Subject matter of analysis:** Company carbon footprint and operating control
- ii. **Year of baseline carbon footprint calculations:** 2019
- iii. **Greenhouse gases:** The most important anthropogenic greenhouse gas that our company produces is carbon dioxide (CO<sub>2</sub>). We include other greenhouse gases in the calculation using the equivalent amount of carbon dioxide (CO<sub>2</sub>e). To determine the Global Warming Potentials (GWP) of these gases for the greenhouse effect we use: <https://www.ipcc.ch/reports/>.
- iv. **Employee responsibility for data accuracy:**
  - Head of Capital Construction and Technical Services: auspices over the entire system
  - Manager for Building Services Engineering: responsible for energy and air conditioning data
  - Fire Protection and OHS Manager: responsible for data on waste management
  - Manager for Building Services Engineering: energy management
  - Property Manager: data on cartridges and office equipment
  - Head of Vehicle Operation: vehicle operation
  - Capital Construction Budget Expert: capital projects
  - HR Manager: responsible for data on employee commuting and working from home
  - IT Manager: ICT data
  - Bank Equipment Manager: bank equipment and ATM data
- v. **Staff training:** CFM training will be conducted once a year in accordance with the relevant directive and a proper record will always be kept of the training course, providing information on the scope of training, the presence of participants, etc.
- vi. **Document keeping:** CFM documentation is maintained in paper or electronic form and is available to internal (employees) and external (auditors, the public) interested parties. It is regularly reviewed once a year as part of internal audit and is kept for five years. A list of CFM documents is part of the CFM documentation.
- vii. **Data collection:** Data collection is based on the company's accounting, energy management, and Alstanet CAFM. Records of AVE (a waste management company), data from suppliers of materials, and employees' internal records are also used.
- viii. **Calculation:** A Preferred by Nature Excel tool was used to calculate the carbon footprint. In 2023, ENVIROS, s.r.o., a consultancy in Komerční banka Group, took over to update calculations and emission data, check data, and carry out internal audit.
- ix. **Emissions not included:** All direct and indirect emissions were included in the calculation of the company's carbon footprint.
- x. **Additionally calculated emissions:** Emissions from employees commuting to work were calculated on the basis of a sample and the total emissions were then calculated.
- xi. **Intensity unit:** Used in the calculation related to a unit, the client in our case. The calculation is related to the number of clients for simplicity and transparency of the calculation.
- xii. **Evaluation system:** An internal audit is performed every year, focused on checking data input, carbon footprint calculation, data quality, data acquisition, and staff knowledge.



- xiii. **Offsetting:** This method has not yet been used.
- xiv. **Carbon footprint perimeter:** Komerční banka, a.s.: the KB head office buildings, two lodging facilities in Prague and Libohošť, branches in the regions, business cars – leases, employees' commuting, business trips, hotel accommodation, energy used in our own and rented premises, waste, water, air conditioning, purchase of paper and cartridges, capital projects, repair, purchase of furniture, bank equipment, ICT, working from home, and ATM. Komerční banka, a.s., pobočka zahraničnej banky: the head office, the branches, leased cars, energy in offices, waste, hotel accommodation, purchase of paper and cartridges, business trips, and employees' commuting, working from home, ICT, and purchase of furniture.



### 3. Carbon footprint results

#### 3.1 Year of baseline footprint calculations

The year 2019 was chosen as the base year, for which the carbon footprint was first calculated to the required extent.

When calculating the carbon footprint for 2023 we also restated the values for the base year because the emission footprint of LCD monitors (related to their production included in Scope 3) was newly added to the calculation. Moreover, we changed the average time of IT use, including LCD monitors; modified the calculation of the mileage covered by business cars, which was reduced by the mileage covered for personal purposes: this mileage is now included in commuting; and changed the coefficient in the calculation of the carbon footprint for **working from home**. The above adjustments resulted in an approximately 3.2% reduction from the original value of the carbon footprint for the reference year 2019.

**Okomentoval(a): [1]:** Terminologie GRI nemá zaveden výraz *home office*, ale jen *working from home*.

#### 3.2 Company's carbon footprint

The company provides services in the banking sector, and therefore the emissions come primarily from using office space and the consumption of energy and materials in these premises, and employees commuting to work. Other sources of emissions are business trips and investments (capex on refurbishment and construction of new branches).

#### Emissions in base year 2019 (restated values)

Total emissions: 38,402.2 t CO<sub>2</sub>e (including 3% reserve) and 23.1 kg CO<sub>2</sub>e per client.

Detailed distribution of emissions	Emissions (kg CO <sub>2</sub> e)	Total footprint share (%)
Electricity	13,848,897	36.1%
Capex (construction, refurbishment, repair, furniture)	5,218,529	13.6%
IT and bank equipment (without ATMs)	1,422,227	3.7%
Heat	2,746,533	7.1%
Natural gas	2,063,585	5.4%
Fuel for company cars	782,751	2.0%
Employees commuting	7,098,188	18.5%
Business trips	1,301,955	3.4%
Working from home	158,321	0.4%
Automobiles	394,462	1.0%
Gases – air conditioning	782,653	2.0%
Other (including ATM)	2,584,119	6.8%
<b>Total</b>	<b>38,402,219</b>	<b>100%</b>

In 2019, we had the largest part of greenhouse gas emissions from **electricity** consumption in offices, branches, and training centres. Another major source of emissions was **employees commuting to work**, where the most frequent mode of transport was by car (42%). An important source of emissions was also the **investments** made, which include, for example, the refurbishment of old and construction of new branches, furniture purchase, etc.



#### 4. Subsequent carbon footprint: 2023

##### 4.1 Emissions in 2023

At the beginning of 2024, we calculated the carbon footprint as follows:

**Total emissions: 15,648.5 t CO<sub>2</sub>e** (including 3% reserve), 9.4 kg CO<sub>2</sub>e per client

Detailed distribution of emissions in 2023	kgCO <sub>2</sub> e	Total footprint share (%)	Change v 2019 (%)
Electricity	1,604,456	10.2%	-88.4%
Capex (construction, refurbishment, repair, furniture)	4,509,998	28.8%	-13.6%
IT and bank equipment (without ATMs)	1,241,540	7.9%	-12.7%
Heat	1,758,494	11.3%	-36.0%
Natural gas	1,306,741	8.4%	-36.7%
Fuel for company cars	368,657	2.4%	-52.9%
Employees commuting	1,321,266	8.4%	-81.4%
Business trips	909,720	5.8%	-30.1%
Working from home	1,160,924	7.4%	633.3%
Automobiles	191,442	1.2%	-51.5%
Gases – air conditioning	144,496	0.9%	-81.5%
Other (including ATMs)	1,130,750	7.3%	-56.2%
<b>Total</b>	<b>15,648,483</b>	<b>100%</b>	

In 2023, our carbon footprint was lower by 59.3% both in absolute terms and per client compared with the base year (2019).

The principal reduction in the carbon footprint in 2023 is due to the bank taking renewable electricity for its own operation of buildings and data centres, and its electric vehicle charging stations. As in the preceding years, this green electricity was bought on the basis of certificated Guarantees of Origin from renewable sources. This also applies to electricity required for our servers and electric vehicles charged at our charging points.

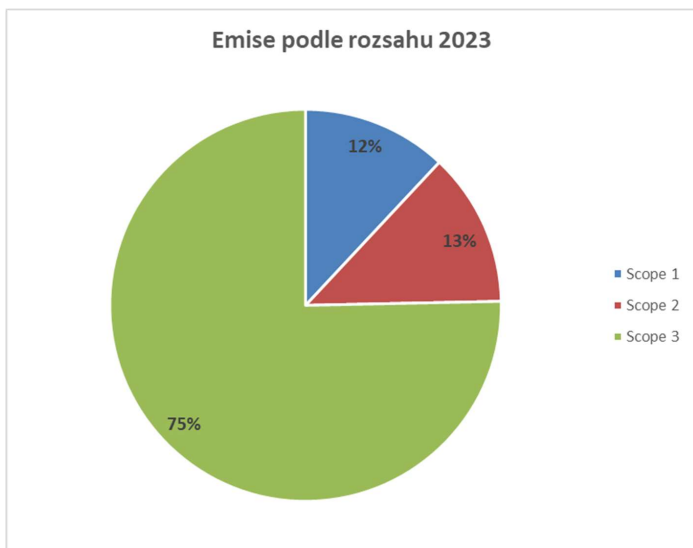
Additional reduction is due to the fact that we increasingly use electric vehicles for our business trips, thus sparing fossil motor fuels, which have higher lifecycle emissions than emissions related to electricity.

Considerable reduction was also achieved in the consumption of natural gas and of heat supplied from district heating systems. This was partly helped by our energy management measures and also warmer weather.

A new photovoltaic power plant was put into operation on our Stodúlky building in 2023. This rooftop system generated 45 MWh, which was consumed in the operation of the building and reduced our grid power offtake.

Our Scope 1 and 2 emissions are declining in both absolute and relative terms. In 2023, the Scope 2 share decreased the most because green electricity was bought almost exclusively. Bought heat made up the largest portion of Scope 2 emissions.

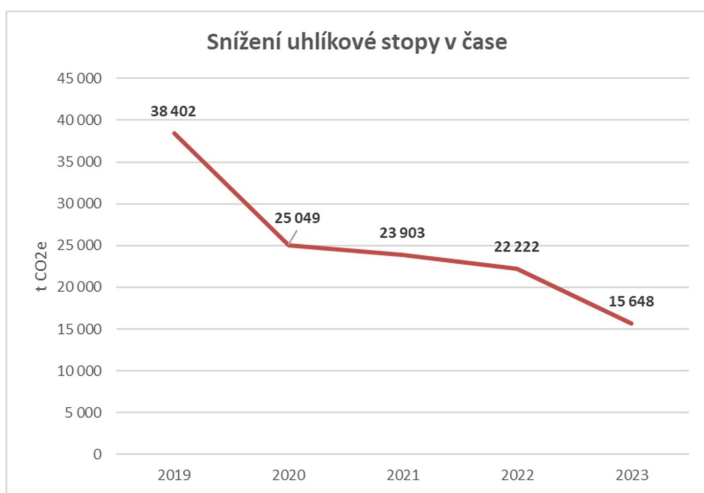




Emissions by Scope in 2023

Okomentoval(a): [2]: do grafu

The most significant factor for the 2023/2022 reduction in emissions was buying almost all electricity from renewable sources combined with increased use of electric vehicles. However, the interpretation of the year-on-year changes is valid to a limited extent only because simultaneously, calculation was changed for some parts of the carbon footprint and Scope 3 was extended. These changes have been restated only for the reference year 2019 and therefore the comparison 2023 versus 2019 has the highest information value.



Emission reduction over time

Okomentoval(a): [3]: do grafu



## 5. Reducing our carbon footprint

### 5.1 Reduction targets

Komerční banka is committed to reducing its impact on the global climate by setting ambitious but realistic emission reduction targets. These targets are being met through a planning tool to reduce the carbon footprint throughout the organisation. The targets are in the areas that our company can influence.

Target	
1	<b>Purchase green electricity and offsets</b> - Gradually increase the use of renewable energy up to 100% of electricity consumption. - Implement this criterion in dealing with electricity suppliers. - Use the energy that the supplier can support by a trustworthy guarantee of origin. - Use PPA (Power Purchase Agreement) projects.
2	<b>Optimise waste production</b> - Implement the electronic office, reduce paper and printing use. - Implement strict criteria for waste sorting and reduction in municipal waste production.
3	<b>Motivate employees</b> and win them for the idea of saving CO <sub>2</sub> emissions - Employees commuting to work and their preference for means of transport with lower CO <sub>2</sub> emissions.
4	<b>Company cars</b> - Implement a new criterion when buying company cars and take into account their carbon footprint. - Prefer electric vehicles. - If buying a car with an internal combustion engine, prefer petrol engines with the lowest possible CO <sub>2</sub> emissions (do not buy cars with a carbon footprint higher than 100 gCO <sub>2</sub> per km).
5	<b>Savings in the consumption of electricity and other utilities</b> - Set rules for the use of lighting (considering daylight). - Analyse the use of space heating in buildings. - Switch off devices that are not in use. - Modify the operation and management of building services equipment: optimise energy management in buildings. - Refurbish obsolete energy systems of buildings (boiler rooms, HVAC units, cooling stations, etc.).
6	<b>Transport</b> - Extend working from home. - Prefer economy class to business class flights.



## 5.2 Emission reduction action plan

Emission reduction action plan	Required effect	Timeframe* <sup>1</sup>	Resulting effect	
1	<b>Green electricity purchase and support for offsets</b>	Use renewable electricity and offsets to halve the total carbon footprint by 2025.	2020 0% 2021 10% 2022 17% 2023 28% 2024 39% 2025 50%	Halving the total carbon footprint via buying green energy and offsets.
<p><b>2023</b> In 2023, almost 100% of electricity bought and consumed was based on certificates of origin from renewable energy sources. We put into operation our first photovoltaic power plant on the roof of our head office building. The electricity carbon footprint dropped by 88% between 2019 and 2023, whereby we significantly surpassed our original targets.</p> <p><b>The 2024 Action Plan:</b> The company will continuously seek to reduce its electricity consumption and look for opportunities for potential savings thereof. In 2024, it will complete the installation of ten photovoltaic power plants on its branches. It will examine the options for taking renewable electricity using PPA projects.</p>				
2	<b>Optimise waste production</b>	Reduce the amount of landfilled waste in favour of recycled or burned waste.	2020 5% 2021 10% 2022 15% 2023 20% 2024 25% 2025 30%	Reduce waste emissions by 5% each subsequent year
<p><b>2023</b> The waste carbon footprint continued in its downward trend and decreased by 15% year-on-year. Compared with 2019, the waste carbon footprint dropped by more than 90%. The share of landfilled waste dropped to less than 0.5%. Plastic waste production declined significantly by 27% year-on-year. This was probably helped by installing soda bars at our branches and tighter EU legislation.</p> <p><b>The 2024 Action Plan:</b> The target has been met. We will continue to increase the share of recycled waste and to reduce the overall amount of waste.</p>				
3	<b>Motivate employees</b>	Sustained reduction in emissions from employees' commuting.	2020–2025	Reduce emissions from employees' commuting by 3% each subsequent year.
<p><b>2023</b> Calculated emissions from employees' commuting were lower by 81% compared with 2019, but increased by 30% year-on-year. The rise is probably due to the stronger commuting following the end of the covid measures. We are spreading the questionnaire on employee commuting some more in the branch network, which in general experiences more commuting. We also provided a better explanation with the questionnaire and its return increased to 32%.</p> <p><b>The 2024 Action Plan:</b> Maintain the share of working from home, and seek to increase the number and improve the accuracy of employees' responses to the commuting questionnaire, thereby reducing the potential error rate.</p>				
4	<b>Business cars</b>	Sustained reduction in emissions from transport in	2020–2025	Reduce emissions from transport in business cars by 3%

<sup>1</sup> The timeframe is set in the base year 2019 and has not been changed over the years.



		business cars.		each subsequent year
<p>In 2023, we achieved another reduction in emissions from company cars, mainly thanks to switching to electric vehicles and reducing the number of IC automobiles. The gradual replacement of the vehicle fleet resulted in a visible change of the mileage structure in 2023. Electric vehicles covered 37% of the business mileage.</p> <p><b>The 2024 Action Plan:</b>  <b>Monitor the use of company vehicles, and continue the transition to electric vehicles. Reduce the diesel and petrol vehicles' mileage. Identify the staff members who record the largest mileage and ensure that they migrate to electric vehicles.</b></p>				
5	<b>Reduce consumption of electricity and other utilities</b>	Sustained reduction in emissions from the consumption of electricity and other utilities.	2020–2025	Reduce emissions from electricity consumption by 3% each subsequent year.
<p>In 2023, the company reduced its carbon footprint from energy and water consumption. Overall electricity consumption declined by only 1% year-on-year. The most important factor was the significant increase in the number of electric vehicles, which, on the other hand, helped to reduce its consumption of fossil fuels. Improved energy performance of buildings is the result of additional steps in the use of energy management. In 2024, the company will continue to monitor these values and seek to reduce them even more.</p> <p><b>The 2024 Action Plan:</b>  <b>In 2024, the company will continue to follow the current energy saving measures in place, and gradually implement them in all the properties used. It will expand its monitoring of energy consumption in its properties. Ten photovoltaic power plants will be completed.</b></p>				
6	<b>Transport</b>	Sustained reduction in emissions from business trips.	2020–2025	Reduce emissions from business trips by 3% each subsequent year.
<p>In 2023, the carbon footprint from business trips rose 14% year-on-year. The rise took place in all categories due to the renewed travelling following a significant slump in the covid years. Compared with 2019, the carbon footprint from business trips was 25.4% lower. The share of business class dropped to 1% of the total air mileage.</p> <p><b>The 2024 Action Plan:</b>                  2024 will see continued support for working from home and holding meetings via video conferencing, and additional support for the use of electric vehicles at the expense of IC vehicles.</p>				



## 6. Offsetting carbon footprint

### 6.1 Offset targets

Komerční banka did not compensate for its emissions in 2023 or earlier. Offsetting CO<sub>2</sub> emissions related to its activities is being considered for the coming years. Carbon compensations, or offsets, work as follows: the compensating organisation pays for projects implementation by another entity, and such mitigation takes place outside the organisation.

Carbon credits are purchased from pre-verified suppliers and subject to consultation with a certification company. All of these projects comply with offset principles and guarantee the highest possible quality of the projects and conclusive emission reductions.

Only projects certified by the following standards will be used for offsetting:

- Gold Standard (incl. CarbonFix) <https://www.goldstandard.org/>
- Voluntary Carbon Standard <https://registry.verra.org/>
- Plan Vivo Standard <https://www.planvivo.org/>



## 7. Data quality evaluation

### 7.1 Data quality records

In order to monitor and improve data quality over time, Komerční banka provides a qualitative and quantitative assessment of data quality throughout the carbon footprint management system, including activity data, data allocation, estimates and restatements, as well as the emission factors used. Data quality is evaluated on the basis of completeness, and their temporal, geographical and technological representativeness.

### 7.2 Data quality evaluation

Komerční banka seeks to use primarily current and accurate input data. This includes the provision of primary data for all activities under the company's control, at least all emissions for Scopes 1 and 2, obtained from invoices, Alstanet's CAFM system, energy management, mileage covered, and annual or monthly meter readings. The extent of Scope 3 may in some cases be estimated or allocated due to incomplete data obtained.

Number	Activity	Scope	Primary (accurate)	Secondary (calculated, estimated)
1	Natural gas	1	X	
2	Diesel in the generating unit	1	X	
3	Air conditioning, refrigerant	1	X	
4	Company car, diesel	1	X	
5	Company car, petrol	1	X	
6	Electricity	2	X	
7	Electricity for cooling	2		X
8	Electricity for vehicles	2	X	
9	Green electricity	3	X	
10	Heat	2	X	
11	Waste	3	X	
12	Business trips, hotels	3	X	
13	Business trips, airplanes	3		X
14	Business trips, taxi	3		X
15	Employees' commuting	3		X
16	Investment	3		X
17	Material	3	X	
18	Water	3	X	



### 7.3 Improvement of data quality over time

Komerční banka is committed to improving the data collected and used in the calculation of the carbon footprint over time, with a view to ensuring the most accurate carbon footprint result possible and demonstrating reduction thereof. Komerční banka is taking steps to ensure the highest data quality within and outside the organisation, including compliance with best practice and using the latest updated sources, and will make every effort to use primary rather than secondary data. These efforts are as follows:

- i. Improve the collection of data on employees' commuting.
- ii. Primary data: Ensure timely and continuous primary data recording by responsible employees. The data must be supported by the respective documents.
- iii. Data collection: The authorised employees collect data and transmit them, on a regular basis, to the person responsible for the calculation. This person is responsible for the quality and accuracy of the data.
- iv. Emission factors: Monitor emission factors and continuously acquire the current ones.
- v. Allocation methods: Try to limit estimates and additional calculations.

### 7.4 Data evaluation for 2023

In 2023, the company carried out certain measures with a view to improving the quality of the data reported:

- We added emissions from the lifecycle of LCD monitors, which had not been monitored earlier.
- We broke down the calculation of capex-related emissions as follows: IT, Furniture, Service Sourcing, and Construction Work. Each of these categories has its own carbon factor. These carbon factors have been specified for capex amounts in CZK, and therefore have been adjusted for the purpose of these measures to reflect inflation in each particular category.

	The 2024 Action Plan	Resulting effect
1	More accurate input data for emission sources	Value accuracy improvement
2	More detailed values of inputs	Value accuracy improvement
3	Larger number of employees responding to the question about commuting	Value accuracy improvement
4	Improved records of electricity consumption for electric vehicles	Value accuracy improvement



#### 8. Source of emission factors for 2023

- Some of the emission factors were taken from DEFRA 2023 records: (<https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>)
- Some of the emission factors were taken from the widely used Ecoinvent database.
- For electricity supplied by ČEZ, the emission factor provided by ČEZ was used. For electricity for the whole Czech Republic, the emission factor of the residual energy mix was used, <https://www.aib-net.org/facts/european-residual-mix>. For electricity from renewable sources based on certificates, the Ecoinvent database values for each of the RES were used.
- For construction work, the emission factor was taken from a technical report that took the local conditions into account, <https://iopscience.iop.org/article/10.1088/1755-1315/222/1/012013>.
- Emission factors based on emissions per unit of currency (spend-based factors) have been adjusted depending on the development of the price levels in the relevant sector.
- For natural gas, heat, furniture, and capital project work, and certain other items, the emission factors from the Ecoinvent database were used.





## 9. Climate and carbon footprint communication

### 9.1 Public communication on climate

Komerční banka communicates carbon footprint results on an annual basis. This information can be found in the following documents:

Document title	Document content and purpose	Link
Company website	General information	<a href="https://www.kb.cz/cs/o-bance/vse-o-kb/podnikame-udrzitelne/environmentalni-udrzitelnost">https://www.kb.cz/cs/o-bance/vse-o-kb/podnikame-udrzitelne/environmentalni-udrzitelnost</a>

### 9.2 Carbon footprint management statements and logos

Komerční banka uses CFM statements and logos to demonstrate its effort to manage the carbon footprint.

