



December 2023

Dear Client,

Deutsche Bank AG and its affiliates (“**Deutsche Bank Group**”) have global Operational Resilience, Business Continuity Management (BCM) and Crisis Management (CM) programs in place to support the continuity of important business services and functions of the bank in the event of crises or operational disruptions.

## Operational Resilience

“**Operational Resilience**” is defined as Deutsche Bank’s ability to detect, prevent, effectively respond to, recover, and learn from operational disruptions. Given that the possibility of operational disruption is an unavoidable aspect of the operating environment, a risk-based and systematic approach to Operational Resilience provides greater assurance to senior management that those business and infrastructure functions which deliver Deutsche Bank Group’s material business services are adequately prepared for future disruption.

Deutsche Bank Group complies with Operational Resilience-related regulatory requirements in the regions and/or jurisdictions where it operates (where applicable).

## Crisis Management – Effective Response

In order to support Deutsche Bank’s Operational Resilience, the bank’s crisis management framework is designed to enable readiness to deal with a crisis stemming from operational disruption and thereby mitigate the risk of an inadequate or unsuccessful response.

Deutsche Bank Group’s Crisis Management (CM) principles are as follows:

- **Scenario** – The CM framework can be applied to any incident stemming from operational disruption requiring cross-silo coordination, irrespective of cause.
- **Scale** – A flexible framework which can be scaled to the crisis or disruption, and which can be invoked at either a local or global level, and either in part or in full.
- **Time** – A timely response is vital to allow an appropriate response to operational disruptions and enable recovery and return to ‘business as usual’ as soon as possible. Accordingly, CM team members must be aware of their responsibilities and appropriately trained.
- **Collaboration** – The model leverages subject matter experts from across Deutsche Bank to facilitate a successful response. The process is designed to bring all relevant parties together, further communication and collaboration amongst the different parties as well as the coordination of actions and decisions.

## Business Continuity Management – Deeply Embedded

BCM consists of the set of activities that Deutsche Bank Group conducts to prepare for and, more importantly, recover its processes from operational disruptions, since it is required to maintain an appropriate level of availability for its services. BCM activities are designed to limit the risk of inadequate recovery.

The BCM program has clearly defined roles and responsibilities which are documented in the bank’s corporate standards. This program is staffed and managed within each region by



specialists who coordinate preparedness efforts with BCM-trained staff embedded in each business and infrastructure area. The regional Business Continuity teams provide expertise and guidance to all business functions within Deutsche Bank as they develop, implement, test, and maintain effective BCM programs and recovery processes.

Deutsche Bank Group's BCM programs plan for the impact of a wide variety of disruptions, including but not limited to:

- Loss of production facility – Deutsche Bank office & home
- Pandemic
- Significant staff unavailability
- Loss of business application
- Loss of data
- Loss of third-party provider
- City-wide outage, e.g., for service centers
- Loss of technology infrastructure (where applicable)

In support of its BCM program, Deutsche Bank maintains technical, including data availability recovery plans to protect and recover applications, information assets and technical infrastructure in the event of a facility failure or technology outage. Due to specific identified vulnerabilities, contingency measures are undertaken to mitigate against the risk of a city-wide outage.

## Audit

Deutsche Bank's Operational Resilience, CM and BCM programs are subject to both regular and ad hoc reviews by internal and external auditors, and regulatory authorities as required by financial industry regulation.

## Regulatory Obligations

In the case of differences between the Operational Resilience, CM and BCM policies and standards or the technical disaster recovery standards and local legal or regulatory obligations, the stricter obligation is adhered to.

Sincerely Yours,

Deutsche Bank AG  
Non-Financial Risk Management Operational Resilience

*Please note that this information is subject to modification.*