



Deutsche Bank

April 2021

Dear Client,

Deutsche Bank's commitment to our clients extends over one hundred and fifty years. We recognize that significant business disruptions are a possibility. We have in place comprehensive business continuity procedures designed to minimize the impact of significant business disruption. This letter summarizes the measures Deutsche Bank is taking through its global Business Continuity Management Program (BCM Program) to respond to significant business disruptions; specific detail on Deutsche Bank's response, and ongoing management, of the Coronavirus Disease 2019, ("COVID-19") is detailed.

### COVID-19

Deutsche Bank's primary focus throughout the COVID-19 Pandemic is reducing the Health Risks to our employees, their families and others to whom a duty of care is owed to the lowest practicable level (Employer obligations) whilst ensuring Regulator, Market and Client obligations are fulfilled. We are vigilantly monitoring the development of the COVID-19 situation in all regions, including evaluating government authorities' assessment and advice and we will adapt our procedures accordingly. We are currently looking at how we can support the vaccination strategy of governments and authorities.

In order to meet these priorities DB has developed a phased mitigation plan built on existing, regional, Business Continuity Plans (BCPs):

1. **Prepare.** Deutsche Bank's Business As Usual (BAU) activity provides a safe working environment through operation of hygiene and cleanliness controls in order to reduce infection transmission risks.

Defined Regional BCPs are tested and exercised against numerous scenarios, including 'Pandemic/significant staff unavailability (25 – 40% unavailability)', on an annual basis. Specific standards (Minimum Standards for Pandemic Preparedness) provide further direction to accountable managers.

Critical Vendors (Tier 1) are assessed via a Third Party Risk Management process to provide assurance of their ability to deliver on service level agreements during periods of significant disruption.

2. **Respond.** Deutsche Bank initiated its Global Crisis Management Plan on 24 February 2020 with all major DB locations invoking BCPs by 16 March 2020.

Predefined BCPs focused on two aspects, 'Split operations' for critical staff/functions and Working From Home (WFH) for non-critical staff; predefined BCPs must be sustainable for 5 working days.

As the assumptions that BCPs were defined against quickly changed, with further reaching Government restrictions than anticipated, dynamic reassessment (and subsequent invocation) of BCPs focusing on maximizing the number of staff WFH occurred. Additionally, controls associated with business travel were gradually enhanced to the point of imposing a global restriction on all travel and are still valid today.

3. **Maintain.** The ongoing operational transformation driven by COVID-19, to what is since March 2020 a home working organisation, may require maintenance for a prolonged period of time. Ensuring operational stability through this period, to deliver on Regulatory, Market & Client obligations, is critical and self-evident. In order to further build operational resilience oversight of Vendor, Financial Market Infrastructure (FMI) and Technology performance has been enhanced.



- 4. Return to Office Activity.** Globally applicable principles on returning to office based working will enable appropriate senior management decision making for their locality/working environment. Key triggers to enable consideration for resuming on-site activity include the local situation, wider government/financial sector guidance and internal Deutsche Bank situation. Adherence to defined minimum control standards will ensure local decision making is conducted in line with global principles.

This four phase plan has given Deutsche Bank the ability to provide continuity of service as well as provide for the continued welfare of our staff and clients.

#### **Deutsche Bank's Business Continuity Management (BCM) Program**

Deutsche Bank is committed to protecting its staff and securing the continuity of critical group businesses and functions in order to protect the banks franchise, mitigate risks, safeguard client services and sustain both stable financial markets and customer confidence. Deutsche Bank has developed, implemented and continues to test and maintain its global BCM Program to ensure it attains these objectives.

The BCM Program outlines core procedures for the relocation or the recovery of operations in response to varying levels of disruption. A number of scenarios are considered including: staff unavailability, complete loss of a single production site, loss of vendor services and loss of application software.

These procedures provide information for responsible Deutsche Bank personnel to evaluate the business disruption and initiate appropriate action, including:

- Safeguard staff and Deutsche Bank property,
- Communicate between staff, regulators, clients, and vendors
- Provide the client with access to their funds and securities, and
- Protect Deutsche Bank books and records and recover/resume normal operations.

Each of our core businesses functions and infrastructure groups construct and maintain their business continuity plans (BCPs) to ensure a continuous, reliable service. BCPs are based on predefined strategies, roles and responsibilities. BCPs are designed to ensure provision of critical business processes and IT systems within predefined recovery time frames. BCPs are reviewed, updated and tested annually or when significant changes occur.

In support of our BCM Program, Deutsche Bank maintains technical disaster recovery plans to protect and recover applications, information assets and technical infrastructure in the event of a facility failure or technology outage. In addition and because of specific identified vulnerabilities, further contingency measures are undertaken to mitigate against the risk of a city-wide outage.

#### **Roles & Responsibilities**

The BCM Program has defined roles and responsibilities, which are documented in corporate standards (including the Technical Disaster Recovery Standard). This fosters a constant and effective approach to the provision of resiliency throughout Deutsche Bank and results in an efficient fit-for-purpose business continuity capability. The BCM Program is staffed and managed within each region by specialists who co-ordinate 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 in developing, implementing, testing and maintaining effective BCPs and recovery processes. Similarly, the technical disaster recovery standards are implemented regionally by Deutsche Bank's technology department.

The Deutsche Bank Management Board has delegated responsibility for business process disruption risk to the global head of Non-Financial Risk Management Operational Resilience (NFRM OR).

The Deutsche Bank Management Board retains overall responsibility for policy setting, supervision and effective implementation of the business continuity policy. Compliance with the bank's corporate standards is monitored regionally by a regional business continuity council, reporting on a quarterly basis to the global business continuity council.

#### **Crisis Management & Implementation**



NFRM Operational Resilience division ensures that Deutsche Bank has a clearly defined, documented and tested crisis management process for assessing, escalating and managing any business disruption that may affect the bank's ability to continue its critical business operations. This includes a crisis contact and escalation process, which is tested on a regular basis. In addition, BCPs are designed to be implemented in response to varying levels of business disruptions. The nature of the business disruption will affect whether all or only parts of our plans are executed.

### **Business Continuity Recovery Solutions**

Deutsche Bank has a broad recovery program in place to deal with the impact of incident or crisis. Deutsche Bank has a number of customized recovery solutions designed to facilitate the quickest possible resumption of work for the critical businesses and support functions. Examples of these are:

- **Alternate Sites**

Our bank has self-managed, dedicated standby facilities. These recovery sites provide dedicated recovery seats and infrastructure to provide for the needs of the business. Additionally, Deutsche Bank retains recovery sites contractually through service providers who concentrate on business resiliency. All recovery sites are physically separated from normal business locations to prevent both sites being affected by the same incident.

- **Technology Disaster Recovery**

The bank's Information Technology Disaster Recovery (DR) planning takes into consideration possible disruption scenarios such as a loss of data center or the failure of specific IT assets and/or applications supporting critical business operations. In order to address these scenarios, confidential DR plans are in place to manage the recovery and continuation of operations from DR environments located at geographically separate sites. All DR plans are validated periodically and include the assessment of recovery time and recovery point objectives (RTO & RPO) as well as technical and business validation to ensure that the DR environments operate at the required level.

- **Reciprocal Agreements**

Some businesses have partnership agreements with other business units regarding the allocation of a required number of recovery seats or the ability to transfer work. The receiving business unit provides the necessary infrastructure, hardware facilities or staff. Both normal business locations are geographically separated from each other to prevent both sites being affected by the same incident.

- **Displacement Strategy**

Certain business processes can be switched from one location to another and in the longer term, key staff can move to another location unaffected by the incident.

- **Remote Access**

Staff may work remotely, where permitted, in the event of a disruption accessing Deutsche Bank systems via VPN and can divert their telephones to a home or mobile number.

- **Service Providers**

Service providers are contractually obliged to have business continuity capabilities in place to ensure continuity of services provided to Deutsche Bank if the ordinary operation of the service provider is disrupted and to modify their work stream in order to adapt with the business continuity organization of Deutsche Bank. A vendor risk management process is in place to ensure compliance.

- **Pandemic Planning**

Deutsche Bank maintains a risk-based approach to pandemic planning, using as a guide the World Health Organization (WHO) definitions of pandemic phases.

- **Customer Access to Funds and Securities**

If your usual access to funds and securities is impacted by a significant business disruption, we will advise you of the appropriate Deutsche Bank contacts through expedient means at [www.db.com](http://www.db.com).

### **Audit**

Our bank's BCM Program is subject to regular reviews by internal and external audit, and regulatory authorities.



### **Regulatory Obligations**

In the case of conflict between the Business Continuity Policies and Standards or the Technical Disaster Recovery Standards and local regulatory obligations, the stricter obligation is adhered to.

Sincerely yours,

Non-Financial Risk Management Operational Resilience  
Deutsche Bank

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