



Deutsche Bank

March 2020

Dear Client,

Deutsche Bank (DB) recognizes 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 has taken through its global Business Continuity Management Program (BCM Program) to respond to significant business disruptions as well as our preparedness for any potential impact of the COVID-19 (Coronavirus Disease 2019).

### **COVID-19 Readiness**

Given the increase in the number of confirmed and suspected COVID-19 cases worldwide, Deutsche Bank is actively managing the possible impact for the bank and is closely monitoring the development of the situation in all regions to protect its staff and clients. We continue to monitor the government authorities' assessment and advice and change our procedures accordingly.

We have analysed where our staff's exposure to COVID-19 may be greatest and are working with local offices to minimize the risk to local staff and travelling populations. We are following the recommendations of the World Health Organization (WHO) and have updated employees on appropriate hygiene procedures, so that they receive all the necessary information about the evolving situation, including preventive, health and hygiene reports.

Our employees are encouraged to take preventive measures to limit the spread of respiratory viruses. This includes in particular increased hygiene measures on the recommendation of the WHO.

These proactive precautions we are implementing have no impact on our operations and all client service worldwide continues unaffected.

Presently, Deutsche Bank has restricted travel to and out of mainland China, Hong Kong, South Korea and Italy. Travel to these four countries must be exceptionally pre-approved by senior country management prior to booking. Business criticality shall be determined by business line management. Deutsche Bank has implemented a heightened consideration process for travel requirements in order to help preventing the spread of the virus. Audio and video conference meetings are encouraged where possible.

Employees who have returned from mainland China, Hong Kong, South Korea or from the 11 impacted cities in Italy in the regions of Lombardei and Veneto in the last 14 days, or who have household or family members that returned from there in the last 14 days, are asked to self-quarantine immediately after their return for a period of 14 days.

Travel restrictions are under constant review and will be updated as necessary.

### **Deutsche Bank's Business Continuity Management 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 DB personnel to evaluate the business disruption and





initiate appropriate action, including:

- Safeguard employees' and Deutsche Bank property,
- Communicate between employees, 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 DB 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.*

