

Quantitative and Qualitative Disclosures about Credit, Market and Other Risk

Scope of Basel II application

Deutsche Bank Aktiengesellschaft (“Deutsche Bank AG”), headquartered in Frankfurt am Main, Germany, is the parent institution of the Deutsche Bank group of institutions, which is subject to the supervisory provisions of the Banking Act and the SolvV. The Deutsche Bank AG, Bangkok Branch is a segment of Deutsche Bank Aktiengesellschaft and is not a separately incorporated legal entity. Risk management process of Deutsche Bank AG, Bangkok Branch follows risk management process of parent bank.

Included in the following section on quantitative and qualitative disclosure about credit, market and other risks is information regarding to Basel II of Deutsche Bank AG, Bangkok Branch according to Bank of Thailand’s related notifications. Certain portions excerpted from disclosure of Parent bank. More information of parent bank can be found under website <https://www.db.com/ir/en/regulatory-reporting.htm>

Capital Structure

As at 31 December and 30 June 2019, assets maintained in Thailand for capital funds purpose were Bank of Thailand’s Bonds and Thai Government Bonds that are funded from borrowings from other Deutsche Bank branches outside Thailand. The assets maintained and the source of funds were qualified as the bank capital funds as they were fully met with the conditions as specified according to Section 32 of the Financial Institutions Businesses Act B.E. 2551.

The table below presents Deutsche Bank AG, Bangkok Branch’s capital structure as at 31 December and 30 June 2019.

Capital Structure of Foreign Bank Branch

Unit : TTHB

Item	Dec-19	Jun-19
1. Assets required to be maintained under Section 32	18,320,838.52	18,111,222.11
2. Sum of net capital for maintenance of assets under Section 32 and net balance of inter-office accounts (2.1+2.2)	21,158,803.68	25,332,725.50
2.1 Capital for maintenance of assets under Section 32	17,800,000.00	17,800,000.00
2.2 Net balance of inter-office accounts which the branch is the debtor (the creditor) to the head office and other branches located in other countries, the parent company and subsidiaries of the head office	3,358,803.68	7,532,725.50
3. Total regulatory capital (3.1-3.2)	17,799,987.72	17,799,950.89
3.1 Total regulatory capital before deductions (The lowest amount among item 1 item 2 and item 2.1)	17,800,000.00	17,800,000.00
3.2 Deductions	12.28	49.11

Capital Adequacy

The following key principles are our approach to monitor capital adequacy of Deutsche Bank AG, Bangkok Branch.

- Organizes a monthly local Asset and Liability Committee (ALCO) meeting to monitor relevant risk dimensions and setting internal targets to maintain capital adequacy and a sufficient capital buffer as required by Bank of Thailand as well as calibrate the needs of the business divisions to the availability of capital.

- Accommodates the implementation of an Internal Capital Adequacy Assessment Process (ICAAP) required by Bank of Thailand which comes to effective in 2011. Deutsche Bank AG, Bangkok Branch has incorporated a large borrower concentration risk, sector concentration risk and interest rate in banking book for BIS ratio calculation.
- Develops a business plan to manage the businesses' projection growth and the adequacy of capital.

Besides of the above, Deutsche Bank AG, Bangkok Branch also conducts daily monitoring of deduction items from the capital funds according to Bank of Thailand's notifications i.e. assess fair values at end of day of prior working day of derivatives transactions and securities, monitor failed trades and net inter-office balance as well as assess estimated capital adequacy of the bank before undertaking material derivatives transactions.

The following tables represent minimum capital requirement for credit risk, market risk and operational risk as well as capital ratio of Deutsche Bank AG, Bangkok Branch as at 31 December and 30 June 2019.

Unit : TTHB

Minimum capital requirement for credit risk classified by type of assets under the SA	Dec-19	Jun-19
Performing claims		
1. Claims on sovereigns and central banks, multilateral development banks (MDBs), and non-central government public sector entities (PSEs) treated as claims on sovereigns	-	-
2. Claims on financial institutions , non-central government public sector entities (PSEs) treated as claims on financial institutions, and securities firms	2,090,932.11	2,133,159.70
3. Claims on corporates , non-central government public sector entities (PSEs) treated as claims on corporate	3,200,647.84	3,416,775.18
4. Claims on retail portfolios	-	-
5. Claims on housing loans	-	-
6. Other assets	6,575.52	4,732.45
Non-performing claims	-	-
First-to-default credit derivatives and Securitisation	-	-
Total minimum capital requirement for credit risk under the SA	5,298,155.47	5,554,667.33

Unit : TTHB

Minimum capital requirement for market risk	Dec-19	Jun-19
Calculate by Standardised approach	3,304,729.14	3,976,212.33
Total minimum capital requirement for market risk	3,304,729.14	3,976,212.33

Unit : TTHB

Minimum capital requirement for operational risk	Dec-19	Jun-19
Calculate by Basic Indicator Approach	271,039.65	235,584.23
Total minimum capital requirement for operational risk	271,039.65	235,584.23

Unit : %

Total risk-weighted capital ratio	Dec-19	Jun-19
Total capital to risk-weighted assets	22.06	20.05

Risk Exposure and Assessment

Risk Management Framework

The risk management at the Bank is integral to DB Group's risk management framework and processes.

The Bank's business model requires to identify, assess, measure, aggregate and manage risks, and to allocate capital among our businesses. Risk and capital are managed via a framework of principles, organizational structures and measurement and monitoring processes that are closely aligned with the activities and organizational structure of the Bank.

- Core risk management responsibilities are embedded in the Bank's Executive Committee and delegated to senior risk management committees responsible for execution and oversight. The Executive Committee regularly monitors the risk and capital profile.
- We operate a Three Lines of Defence ("3LoD") risk management model. The First Line of Defence ("1st LoD") are all the business divisions and service providing infrastructure areas (i.a., Group Technology Operations and Corporate Services) who are the "owners" of the risks. The Second Line of Defence ("2nd LoD") are all the independent risk and control infrastructure functions. The Third Line of Defence ("3rd LoD") is Group Audit, which assures the effectiveness of our controls. All 3LoD are independent of one another and accountable for maintaining structures that ensure adherence to the designed principles at all levels.
- Risk strategy is approved by the Executive Committee of the Branch on an annual basis and is defined based on the Risk Appetite and Strategic and Capital Plan in order to align risk, capital and performance targets.
- Cross-risk analysis reviews are conducted to validate that sound risk management practices and a holistic awareness of risk exist.
- All material risk types are centrally managed via risk management processes. Modeling and measurement approaches to assess risk in terms of capital demand. Reputational risk, model risk are implicitly covered in DB Group's economic capital framework, primarily within operational and strategic risk.
- Monitoring, stress testing tools and escalation processes are in place for key capital and liquidity thresholds and metrics.
- Systems, processes and policies are critical components of our risk management capability. The Bank has a sound & efficient risk infrastructure in place.
- Recovery plan is managed via a centralized process. DB Group Recovery planning provides the escalation path for crisis management governance and supplies senior management with a list of actions designed to improve the capital and liquidity positions in a stress event.
- At the Group level, resolution planning is closely supervised by the Single Resolution Board ("SRB"). It provides a strategy to manage Deutsche Bank in case of default. It is designed to strengthen financial stability by the continuation of critical services delivered to the wider economy.

Risk Governance

Our operations throughout the world are regulated and supervised by relevant authorities in each of the jurisdictions in which we conduct business. Such regulation focuses on licensing, capital adequacy, liquidity, risk concentration, conduct of business as well as organizational and reporting requirements. The European Central Bank (the "ECB") in connection with the competent authorities of EU countries which joined the Single Supervisory Mechanism via the Joint Supervisory Team act in cooperation as our primary supervisors to monitor our compliance with the German Banking Act and other applicable laws and regulations.

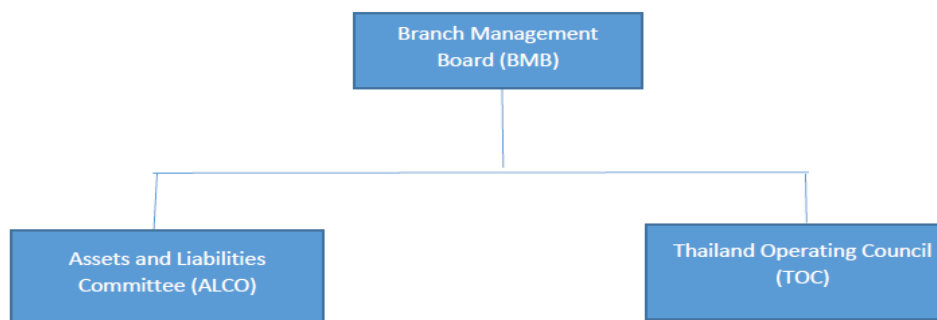
Several layers of management provide cohesive risk governance:

- The Supervisory Board is informed regularly on our risk situation, risk management and risk controlling, as well as on our reputation and material litigation cases. It has formed various

committees to handle specific tasks (for a detailed description of these committees, please see the “Corporate Governance Report” under “Management Board and Supervisory Board”, “Standing Committees”).

- At the meetings of the Risk Committee, the Management Board reports on key risk portfolios, on risk strategy and on matters of special importance due to the risks they entail. It also reports on loans requiring a Supervisory Board resolution pursuant to law or the Articles of Association. The Risk Committee deliberates with the Management Board on issues of the overall risk appetite, aggregate risk position and the risk strategy and supports the Supervisory Board in monitoring the implementation of this strategy.
- The Integrity Committee, among other responsibilities, advises and monitors the Management Board with regard to the management’s commitment to an economically sound, sustainable development of the company, monitors the Management Board’s measures that promote the company’s compliance with legal requirements, authorities’ regulations and the company’s own in-house policies, including risk policies. It also reviews the Bank’s Code of Conduct and Ethics, and, upon request, supports the Risk Committee in monitoring and analyzing the Bank’s legal and reputational risks.
- The Audit Committee, among other matters, monitors the effectiveness of the risk management system, particularly the internal control system and the internal audit system.
- The Management Board is responsible for managing Deutsche Bank Group in accordance with the law, the Articles of Association and its Terms of Reference with the objective of creating sustainable value in the interest of the company, thus taking into consideration the interests of the shareholders, employees and other company related stakeholders. The Management Board is responsible for establishing a proper business organization, encompassing appropriate and effective risk management, as well as compliance with legal requirements and internal guidelines. The Management Board established the Group Risk Committee (“GRC”) as the central forum for review and decision on material risk and capital related topics.
- In Thailand, the Bank’s operations are regulated and supervised by Bank of Thailand. Such regulations focuses on licensing, capital adequacy, liquidity, risks concentration, conduct of business as well as organizational and reporting requirements.
- The Branch Management Board (BMB) as the highest forum in Thailand is aware and kept regularly informed on special developments in our risk situation, risk management and risk controlling, as well as on our reputation and material litigation cases.
- The BMB is responsible for managing the Bank in accordance with the law, the Articles of Association and its Terms of Reference with the objective of creating sustainable value in the interest of the company, thus taking into consideration the interests of the shareholders, employees and other stakeholders.
- The BMB is responsible for establishing a proper business organization, encompassing an appropriate and effective risk management.
- Asset and liabilities Committee (ALCO) of the Branch in Thailand assumes the roles and responsibilities of the Group Risk committee as the central forum for review and decision on the material risk and capital related matter. It is also responsible for checking in compliance with the capital adequacy requirement under the laws and regulations in Thailand.
- Thailand Operating Council (TOC) manages all operations matters for the branch and being a central forum for operational risk management.

The following functional committees are central to the management of risk at the Bangkok Branch :



BMB = Branch Management Board
ALCO = Asset and Liabilities Committee
TOC = Thailand Operating Council

Risk Culture

The risk culture at the Bank is fully integrated in DB Group's risk culture framework and processes. This is underpinned in the below principles and practices.

DB Group seeks to promote a strong risk culture throughout the organization. It aims to help reinforce the Bank's resilience by encouraging a holistic approach to the management of risk and return throughout the organization as well as the effective management of DB Group's risk, capital and reputational profile. DB Group actively takes risks in connection with its business and as such the following principles define the risk culture within DB Group:

- Risk is taken within a defined risk appetite;
- Every risk taken needs to be approved within the risk management framework;
- Risk taken needs to be adequately compensated; and
- Risk should be continuously monitored and managed.

Employees at all levels are responsible for the management and escalation of risks. All employees are expected to exhibit behaviors that support a strong risk culture. To promote this DB Group policies require that behavior assessment is incorporated into our performance assessment and compensation processes. DB Group communicated the following risk culture behaviors through various communication vehicles:

- Being fully responsible for our risks;
- Being rigorous, forward looking and comprehensive in the assessment of risk;
- Inviting, providing and respecting challenges;
- Trouble shooting collectively; and
- Placing Deutsche Bank and its reputation at the heart of all decisions.

These behaviours are reinforced through a comprehensive risk culture training programme, as well as targeted communications and awareness campaigns.

Risk and Capital Management

Risk and Capital Management Organization

The DB Group's Chief Risk Officer (CRO), who is a member of the DB Group Management Board, is responsible for the identification, assessment, management and reporting of risks arising within operations across all businesses and risk types. The below functional committees are central to the Risk function:

- The DB Group's Risk Committee identifies, controls and manages all risks including risk concentrations at the DB Group. To fulfil this mandate, the DB Group's Risk Committee is supported by sub-committees that are responsible for dedicated areas of risk management, including the Non-Financial Risk Committee, the Enterprise Risk Committee, and the Group Reputational Risk Committee.
- The Non-Financial Risk Committee ensures oversight and decision-making on Non-Financial Risks.
- The Group Reputational Risk Committee ensures oversight, governance and decision-making on Reputational Risks. It also provides for an appropriate look-back and lessons learnt process.

- The Enterprise Risk Committee ensures oversight and decision-making on Financial Risks and cross-risks. It is responsible for aggregating and analysing enterprise-wide risk information and recommending risk and return allocation across risks. Enterprise Risk Management will manage enterprise risk appetite and allocation across businesses and legal entities, integrate and aggregate risks to provide greater enterprise risk transparency to support decision making, govern and improve the effectiveness of risk management framework , and commission forward looking stress tests, and manage group recovery and resolution plans.

Dedicated Risk units are established with the mandate to:

- Ensure that the business conducted within each division is consistent with the DB Group's risk appetite;
- Formulate and implement risk and capital management policies, procedures and methodologies that are appropriate to the businesses within each division;
- Approve credit, market and liquidity risk limits;
- Conduct periodic portfolio reviews to ensure that the portfolio of risks is within acceptable parameters; and
- Develop and implement risk and capital management infrastructures and systems that are appropriate for each division.

The heads of the DB Group's Risk units, who are the members of DB's Group Risk Committee, are responsible for the performance of the units and report directly to DB Group's Chief Risk Officer.

DB Group's Finance and Group Audit departments support the Risk function where they operate independently of both the group divisions and of the Risk function.

Structure and Responsibilities of Agencies of Risk Management

Risk management responsibilities conducted by our local management committees which are as below:

1) Branch Management Board (BMB)

The BMB is chaired by Chief Country Officer.

The BMB provides a forum for managing the branch issues in Thailand on:

- The businesses potential and development including return of capital and capital allocation
- Risk policy, organization and governance of risk management as well as an ensuring the oversight of execution of risk and capital management
- Oversees, governs and coordinates the management both financial risks and non-financial risks including establishes a cross-risk and holistic perspective risks of the branch
- Development and review of financial budgets to reflect the risk appetite and branch's strategy
- New product, new process and new transaction to accommodate the business direction
- Co-ordination of coverage of major clients including to review the client portfolio to match with the branch risk appetite
- Regulatory and reputation issues

2) Asset and Liability Committee (ALCO)

The ALCO is chaired by the Treasurer responsible for Deutsche Bank AG, Bangkok Branch or delegate.

The local Asset and Liability Committee (ALCO) provides a forum for managing the capital, liquidity and funding position of Deutsche Bank AG, Bangkok Branch for ensuring regular monitoring of risk positions, capital requirements and regulatory compliance. The ALCO reviews other risk dimensions such as Credit

and Market risk as required to comply with the local Internal Capital Adequacy Assessment Process (ICAAP).

Typical Activities are as below:

- Promotion of decisions and policies made on a Deutsche Bank Group level as applicable to the Bank
- Review of regulatory changes, decision making on and monitoring of implementation of adequate processes
- Discuss market developments and stress test results from adverse market movements on the branch's liquidity position
- Ensure compliance with internal and local external requirements (limits/ ratios/ targets) and/or regulatory requirements
- Calibrate the needs of the business divisions to the availability of capital, liquidity and balance sheet and assist them in adjusting their portfolios to the limited availability of these financial resources
- Setting and reviewing (where relevant) specific targets for risk weighted assets (RWA) by business line (if required), balance sheet size, unsecured funding and daily liquidity stress test.
- Monitoring relevant risk dimensions and setting internal targets to maintain capital adequacy and a sufficient capital buffer as required under the local ICAAP
- Assist in setting and reviewing (where relevant) limits/ targets by instrument for volumes, tenor and term structure, as well as market concentration, limits/ guidelines and targets for investor diversification

3) Thailand Operating Council (TOC)

The TOC is chaired by Country Chief Operating Officer.

The council provides a forum for managing operation issues, including

- Disseminate information which is relevant to Committee members in order for them to achieve both their and Bank's objectives
- Support the implementation of the Operational Risk Management framework across businesses and ensure that appropriate levels of resources from the members' respective business areas are allocated to participate in the implementation
- Monitor the operational risk profiles of each Division and prioritise actions to be taken to mitigate these risks as appropriate
- Review Internal Audit Reports and monitor audit points and ensure that appropriate actions are taken to resolve outstanding audit points in a timely manner
- Review Operational Risk Management status report, loss reports, etc.
- As appropriate, discuss and resolve cross business issues with a view to manage risk and improve service to the businesses
- Monitor cost development of various operations areas
- Monitor and keep updating regulatory changes and development
- Monitor reputational and regulatory and compliance issues
- Update new product and new operational process development & implementation
- Manage staffs and trainings issues

4) Group Audit

- Group Audit ("GA") adds value by providing independent and objective assurance to the Management Board of Deutsche Bank Aktiengesellschaft ("Deutsche Bank") and its group companies ("Group"), on the adequacy of the design, operating effectiveness and efficiency of the risk management system and the systems of internal control. Group Audit also acts as an independent, proactive and forward-looking challenger and adviser to Senior Management of the Group.

- This Group Audit Charter (“Charter”) sets the basis for the organisation of GA and its key operating principles. The Charter is approved by the Management Board and will be reviewed annually by GA to ensure it remains adequate.
- Global Head of Group Audit (GHGA) discharges GA’s responsibilities as laid out in GA Charter. As a “Delegating Person”, the GHGA is empowered to assign responsibilities to other GA staff and to set up the structure of GA committees, including membership, taking into account their aim and tasks.
- The GA Executive Committee is a GA committee established by the GHGA. Its mandate is to agree on GA’s strategy and strategic objectives, structure, policies and procedures and all aspects of GA’s operating model.
- GA supports MB in identifying significant known and emerging weaknesses in the control framework, assessing whether risks, including the potential occurrences of fraud, are appropriately identified and managed. GA is also responsible for assessing the effectiveness and efficiency of risk management, internal controls, governance processes and systems in a holistic and forward-looking manner.
- GA is not responsible for the design, installation, procedures, or operations of the institution’s internal control systems. GA also assists MB in safeguarding the assets, reputation and sustainability of the Group.
- GA evaluates compliance of the Group’s organisational units with the Group’s policies and procedures and key laws and regulations, the integrity of the processes and techniques employed, assumptions and sources of information used in its internal models, and the quality and use of qualitative risk identification and assessment tools.
- GA also plays an integral role in the achievement of the Group’s strategic objectives, assesses the risk and control culture of the organisation as set by the MB and the broader management team, monitors adherence to risk appetite and tolerance limits where defined, and aligns its risk assessment and findings severity against the risk thresholds of the Bank.
- GA regularly meets with the appointed external auditors to discuss audit planning, priorities, scope, audit findings and other relevant information, for the purpose of providing optimal audit coverage to the organisation.
- Audit work is documented in workpapers according to GA’s methodology as set out in the GA Policy and Manual, evidencing the work carried out, including findings and conclusions, in a way that can be understood by suitably qualified third parties (defined as prudent, informed persons). Workpapers and audit reports will be kept in line with the master records schedule.
- GA is independent, objective and not subject to any instructions from MB with regard to the selection and scoping of audits or the reporting and evaluation of audit findings.
- GA’s work is carried out in a professionally competent manner and with due professional care, by employees of the Group, or under supervision of employees, who have the necessary knowledge, skills and experience.
- GA’s activities are based on a comprehensive, risk-based audit plan. GA maintains and updates an Audit Universe covering the Group’s activities and processes, which are identified through a top-down and bottom-up review of the Group’s business and operating units. The risk assessments and methodology underpinning the audit plan are reviewed at minimum annually. The audit plan and any material modifications, as defined in the GA Manual, are approved by MB.
- The audit plan covers the Group’s activities and processes, irrespective of whether they are outsourced or not, in a risk-oriented manner as a general rule within three years. The three-year audit cycle may not be extended to more than five years. The audit plan also includes work mandated by regulatory authorities. Sufficient time is included in the plan so that work required at short notice can be performed as and when required.
- In order to maintain a dynamic, risk-based audit plan, GA undertakes Continuous Monitoring of the Group to facilitate an ongoing, holistic view of risk, leveraging a wide range of sources to determine whether the audit plan remains relevant.
- GA prepares written reports or memoranda on each audit, as well as on non-audit services, and submits them, as defined in the GA policies, to the responsible Senior Managers, and (where

required) to members of MB. Reports and memoranda include the audit subject, results evaluation, findings and remedial actions (for F4 Critical findings) or recommendations (F2 / F3 findings). Findings rated as Critical will be highlighted in the executive summary and the report will be promptly submitted to MB. If there is no agreement between the audited organisational unit and GA regarding F4 remedial actions, the audited organisational unit may include a statement on this matter in the report.

- MB and the Supervisory Board will be informed at least quarterly of the results of the work of GA. Such reports will include findings (control deficiencies as well as thematic macro control issues) identified by GA, and the overall Control Environment, including Overdue Findings. Where applicable, reports will also include findings from other reviewers, including regulators, to identify risks and findings more holistically.
- GA submits a quarterly overall report to MB which includes, inter alia, the audits performed in the period, findings raised that are rated as Critical, and remedial actions taken. The report also contains an account of whether and to what extent the audit plan has been adhered to. GA also submits reports to the Supervisory Board Audit Committee, which will also be sent, prior to or at least simultaneously, to MB. Local and / or regional reports are produced in line with relevant regulatory requirements.
- GA monitors that all F₄ findings, as well as those required by Supervisory Authorities / MB, are remediated within the specified timeframe and conducts follow-up procedures, as defined in the GA Policy. All MB members are informed of their overdue findings.
- GA maintains an internal quality assurance and improvement program (QAIP) that covers all aspects of the GA activity, assesses the efficiency and effectiveness of GA's activities, GAs conformance with the IIA Standards and the UK Financial Services Code, whether internal auditors apply the IIA's Code of Ethics, and assess conformance against Basel and SR¹³⁻¹.

Categories of Risk

Group is exposed to a variety of risks, amongst them credit, market, operational, liquidity, reputational and business risks.

- Credit risk

Credit risk arises from all transactions where actual, contingent or potential claims against any counterparty, borrower or obligor (which we refer to collectively as "counterparties") exist, including those claims that the Bank plans to distribute.

The Bank understands the below dimensions as key drivers for credit risk:

- "Counterparty Risk", the most significant element of credit risk, is the risk that counterparties fail to meet contractual obligations in relation to the claims described above;
- "Country Risk" arising from a country's propensity to economic and political disruption. It therefore relates to the likelihood that changes in the business environment will occur that reduce the viability of doing business in the country or region. Country Risk shall mean the risk that the Bank may suffer a loss due to possible deterioration of economic conditions; political and social upheaval; nationalisation and expropriation of assets; government repudiation of external indebtedness; exchange controls or currency depreciation or devaluation in any given country;
- "Industry Risk" being the risk of adverse developments in the operating environment for a specific industry segment leading to a deterioration in the financial profile of counterparties operating in that segment and resulting in increased credit risk across this portfolio of counterparties.
- "Product Risk" being the risk driven by the underlying structure and economic dependencies of the product in question and can include factors such as tenor, recovery expectations and likelihood of

having an exposure at the time of a default. This category also includes 'Settlement risk' arising from the non-simultaneous transfer of cash or securities due to the settlement or clearance of trades.

The Bank manages credit risk on the basis of policies and guidelines set by Group Credit Risk Management (CRM), an independent risk management function organised in alignment with the divisions of the Bank.

The Bank's CRM is based on the following principles:

- Accept CR only with creditworthy clients based on proper client due diligence
- Manage concentration risk at counterparty, product, country and industry level. Actively mitigate concentration risk through collateralization, hedging and/or distribution
- Allocate CR appetite by considering sustainable risk/return

CRM is organised globally and carries out risk identification, assessment, management, monitoring and reporting of credit risks. The CRM department is independent from business. Accordingly, the Bank adopts the credit policies of DB Group and the Risk Manager is responsible for ensuring that local procedures are compliant with DB Group principles.

- **Market risk**

Market risk arises from the uncertainty concerning changes in market prices and rates (including interest rates, equity prices, foreign exchange rates and commodity prices), the correlations among them and their levels of volatility. Deutsche Bank assumes market risk in both trading and non-trading activities. The bank uses a combination of risk sensitivities, value-at-risk (VAR), stress testing and Economic Capital metrics to management market risks and establish limits.

- **Operational risk**

Operational Risk means the risk of loss stemming from inadequate or failed internal processes, people and systems or from external events. Operational risk includes legal risk, but excludes business and reputational risk and is embedded in all banking products and activities. Operational risk forms a subset of the Bank's non-financial risks (NFR)

- **Liquidity risk**

Liquidity risk is the risk arising from our potential inability to meet payment obligations when they come due or only being able to meet these obligation at excessive costs. Liquidity risk management safeguards our ability to meet payment obligations. Our liquidity risk management framework has been an important factor in maintaining adequate liquidity and in managing the funding profile during 2019.

The Management Board defines our liquidity risk strategy, and in particular its tolerance for liquidity risk based on recommendations made by Treasury and Group Risk Committee.

- **Business risk**

Business or Strategic risk is the risk of a shortfall in earnings (excluding other material risks) due to incorrect business plans (owing to flawed assumptions), ineffective plan execution or a lack of responsiveness to material plan deviations. Strategic risk arises from the exposure of the bank to the macroeconomic environment, changes in the competitive landscape, and regulatory and technological

developments. Additionally, it could occur due to errors in strategic positioning, the bank's failure to execute its planned strategy and/or a failure to effectively address under-performance versus plan targets.

- **Reputational risk**

Reputation risk is defined as the risk of possible damage to Deutsche Bank's brand and reputation, and the associated risk to earnings, capital or liquidity arising from any association, action or inaction, which could be perceived by stakeholders to be inappropriate, unethical or inconsistent with the Bank's values and beliefs.

Risk Management Tools

The DB Group uses a comprehensive range of quantitative methodologies for assessing and managing risks. As a matter of policy, the DB Group continually assesses the appropriateness and the reliability of its quantitative tools and metrics in light of DB Group's changing risk environment. Some of these tools are common to a number of risk categories, while others are tailored to the particular features of specific risk categories. These advanced internal tools and metrics the DB Group currently uses to measure, manage and report its risk are:

Economic Capital

Economic capital measures the amount of capital DB Group needs to absorb from very severe unexpected losses arising from the DB Group's exposures. "Very severe" in this context means that economic capital is set at a level to cover with a probability of 99.98% the aggregated unexpected losses within one year. DB Group calculates economic capital for the default risk, transfer risk and settlement risk elements of credit risk, for market risk, for operational risk and for general business risk. DB Group continuously reviews and enhances its economic capital model as appropriate. It uses economic capital to show an aggregated view of its risk position from individual business lines up to its consolidated Group level. In addition, the Group considers economic capital, in particular for credit risk, when the Group measures the risk-adjusted profitability of its client relationships.

Expected Loss

The DB Group uses expected loss as a measure of the credit and operational risk. Expected loss is a measurement of the loss the DB Group can expect within a one-year period from these risks as of the respective reporting date, based on historical loss experience. When calculating expected loss for credit risk, DB Group takes into account credit risk ratings, collateral, maturities and statistical averaging procedures to reflect the risk characteristics of different types of exposures and facilities. All parameter assumptions are based on statistical averages of up to seven years based on DB Group's internal default and loss history as well as external benchmarks. DB Group uses expected loss as a tool of the risk management process and as part of DB Group's management reporting systems. DB Group also considers the applicable results of the expected loss calculations as a component of its collectively assessed allowance for credit losses included in its financial statements. For operational risk DB Group determines the expected loss from statistical averages of internal loss history, recent risk trends as well as forward looking expert estimates.

Value at Risk

The DB Group uses the value-at-risk approach to derive quantitative measures for market risks. The Group's value-at-risk figures play a role in both internal and external (regulatory) reporting. For a given portfolio, value-at-risk measures the potential future loss (in terms of market value) that will not be exceeded

with a defined confidence level in a defined period. The value-at-risk for a total portfolio represents a measure of diversified market risk (aggregated using pre-determined correlations) in that portfolio.

Stress Testing

The Bank stress tests its pillar 1 capital as required and specified by Bank of Thailand. The Bank's Stress Tests are reported in the RCP report and regularly discussed by the BMB and ALCO. The BMB ensures that stress testing framework and scenarios used reflect all relevant material risks as well as local regulatory requirements. The BMB approves such stress testing framework, and is informed about the stress testing results regularly. It also assesses the viability of the Bank's capital planning based on the stress test results. The BMB is responsible to initiate and properly document remedial measures and mitigating actions (including explanations that justify the credibility and feasibility of those actions) based on the stress test results under consideration of the risk appetite, if deemed appropriate or necessary. The Bank subjects all risk types covered under its EC concept (Pillar 2 risks), as well as liquidity risk, to regular stress tests. At Group level, the Stress Testing Committee is responsible for aligning scenario definitions between DB Group and legal entities according to the Global Stress Testing Policy.

Risk Appetite Framework

Risk appetite expresses the level of risk that we are willing to assume within our risk capacity in order to achieve our business objectives. Risk appetite is expressed in both qualitative statements and quantitative metrics. Risk capacity is defined as the maximum level of risk we can assume before breaching regulatory capital requirements and liquidity needs and our obligations to stakeholders.

Risk appetite is an integral element in our business planning processes via our Business and Risk Strategy, to promote the appropriate alignment of risk, capital and performance targets, while at the same time considering risk capacity and appetite constraints from both financial and non-financial risks. We leverage the stress testing process to test the compliance of the plan also under stressed market conditions. Top-down risk appetite serves as the limit for risk-taking for the bottom-up planning from the business functions.

The Risk Appetite Statement (RAS) at the Bank ensures that risk taking activities at the Bank is consistent with DB Group's strategy, business and risk overviews, as well as the local regulatory environment. Key objectives of the RAS are to:

- Articulate the Bank's risk appetite clearly via both quantitative metrics and qualitative statements;
- Detail an overall approach in communicating risk appetite across and within the Bank;
- Set ultimate boundaries for the Bank's risk/reward target setting;
- Ensure that the Bank has sufficient financial resources to support daily business at any given point in time and to absorb stressed market events;
- Be able to anticipate emerging risks and be adaptive towards changing economic and regulatory developments;
- Provide the basis for ongoing monitoring of our risk profile through the Bank's 'Risk and Capital Profile' report; and
- Define thresholds for each metrics at which escalation will be triggered.

In facilitating a consistent understanding of the nomenclatures around risk appetite, all key definitions established at DB Group level are adapted to the Bank as below:

Risk Appetite Framework: The overall approach, including policies, processes, controls, and systems through which risk appetite is established, communicated, and monitored;

Risk Capacity: The maximum level of risk that the Bank can assume before breaching regulatory capital and liquidity needs and its obligations to stakeholders;

Risk Appetite: The aggregate level of risk that the Bank is willing to assume within its risk capacity to achieve its business objectives;

Limit: Quantitative restriction on the size or amount of risk exposure based on forward looking assumptions;

Risk Profile: Point in time assessment of the Bank's gross and net risk exposures aggregated within, and across, each relevant risk type, business unit and legal entity based on current or forward-looking assumptions.

The Bank's Risk Appetite articulates the overall tone from the top in pursuing risk across the Bank and supports DB Group's risk culture, in reinforcing the bank's holistic risk management practices. In conjunction to the qualitative statements, the Bank desires to:

- Risk is taken within a defined risk appetite, which is actively managed and monitored in a timely manner, in order to maintain a robust risk profile and capital adequacy.
- Maintain stable funding and strategic liquidity to ensure that business is conducted within the liquidity risk appetite.
- Avoid any undue concentrations within the portfolios considering multiple dimensions. e.g. counterparty, region/ country, industries, products/ asset classes and business lines.
- Promote balanced risk adjusted performance and be fully responsible for accepting well compensated risks within risk appetite.
- Ensure that any business activity is supported by appropriate processes and controls to minimize operational risk.
- Minimize negative reputational, environmental and social impacts of our business activities.

The Bank assigns key risk appetite metrics that are sensitive to the material risks to which the bank is exposed to and which are able to function as key indicators of the bank's financial health in terms of liquidity and capital requirements. These key metrics are Common Equity Tier 1 (CET1) ratio, Economic Capital Adequacy (ECA) ratio, Liquidity Coverage Ratio (LCR), Stressed Net Liquidity Position (SNLP).

In order to determine risk appetite and capacity, thresholds are set and the escalation mechanism are defined for further action. The levels chosen reflect the Bank's strategic focus and business plan as well as additional internal and external stakeholders. Monitoring of risk profile using key risk appetite metrics is implemented using framework as described below:

Green status (within risk appetite): Performances are in line with the Bank's preparedness to accept risk to achieve its business objectives and risk management is considered to be operating in a normal environment. As part of normal risk management, measures are actively taken to ensure that the risk profile remains within our risk appetite, and move towards the externally disclosed strategic target as in the Risk and Capital Demand plan.

Amber status (within risk capacity): Issues that may position threats to the Bank's business model, deviate from our desired risk appetite and undermine the stakeholder expectations. Heightened risk management or mitigating actions may be applied in reference to the escalation matrix, in ensuring timely intervention.

Red status: Once the risk capacity is crossed, mitigating actions are invoked if not already triggered in the amber range.

In the event that the desired risk appetite is breached under either normal or stress scenarios, an escalation is made to the BMB which has to review and decide if further escalations to the Group and/or mitigating actions are required to bring risk profile back to the desired risk appetite range.

The following tables represent outstanding of on-balance sheet assets, off-balance sheet items and provisions of Deutsche Bank AG, Bangkok Branch as at 31 December 2019 and 2018.

General information on credit risk *

Outstanding amounts of significant on-balance sheet assets and off-balance sheet items before adjusted by credit risk mitigation

(Show outstanding at the end of the period)

Unit : TTHB

Item	2019	2018
1. On-balance sheet assets (1.1 + 1.2 + 1.3)	82,512,260.60	70,476,037.02
1.1 Net loans ^{1/}	37,391,054.22	26,462,159.44
1.2 Net Investment in debt securities ^{2/}	26,302,872.91	30,087,295.37
1.3 Deposits (including accrued interest receivables)	642,809.86	421,728.98
1.4 Derivatives	18,175,523.61	13,504,853.23
2. Off-balance sheet items ^{3/} (2.1 + 2.2 + 2.3)	1,552,995,977.49	2,475,542,486.23
2.1 Aval of bills, guarantees, and letter of credits	251,264.05	783,044.88
2.2 OTC derivatives ^{4/}	1,551,091,734.92	2,473,454,253.15
2.3 Undrawn committed line	1,652,978.52	1,305,188.20

* Assets on balance sheet not including equity exposures. Off-balance sheet items including equity exposures

^{1/} Including accrued interest receivables and net of deferred incomes, allowances for doubtful accounts and allowances for revaluation from debt restructuring and including net loans of interbank and money market.

^{2/} Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for impairment of securities

^{3/} Before multiplying credit conversion factor

^{4/} Including equity-related derivatives

Outstanding amounts of on-balance sheet assets and off-balance sheet items before adjusted credit risk mitigation classified by country or geographic area of debtor

Unit : TTHB

Country or geographic area of debtor	2019					Off-balance sheet items ^{3/}			
	Total	Net loans ^{1/}	Net Investment in debt securities ^{2/}	Deposits (including accrued interest receivables)	Derivatives	Total	Aval of bills, guarantees, and letter of credits	OTC derivatives	Undrawn committed line
1. Thailand	75,591,010.54	37,391,054.22	26,302,872.91	599,680.17	11,297,403.24	939,371,886.22	25,424.47	937,693,483.23	1,652,978.52
2. Asia Pacific (exclude Thailand)	2,687,615.47	-	-	-	2,687,615.47	299,428,055.27	225,839.58	299,202,215.69	-
3. North America and Latin America	158,946.97	-	-	63.41	158,883.56	21,612,057.94	-	21,612,057.94	-
4. Africa and Middle East	-	-	-	-	-	-	-	-	-
5. Europe	4,033,437.53	-	-	1,816.18	4,031,621.35	292,583,978.07	-	292,583,978.07	-
6. Others	41,250.10	-	-	41,250.10	-	-	-	-	-
Total	82,512,260.61	37,391,054.22	26,302,872.91	642,809.86	18,175,523.62	1,552,995,977.50	251,264.05	1,551,091,734.93	1,652,978.52

Unit : TTHB

Country or geographic area of debtor	2018					Off-balance sheet items ^{3/}			
	Total	Net loans ^{1/}	Net Investment in debt securities ^{2/}	Deposits (including accrued interest receivables)	Derivatives	Total	Aval of bills, guarantees, and letter of credits	OTC derivatives	Undrawn committed line
1. Thailand	65,611,007.76	26,428,441.76	30,087,295.37	400,585.32	8,694,685.31	1,077,654,817.21	406,221.58	1,075,943,407.43	1,305,188.20
2. Asia Pacific (exclude Thailand)	3,040,564.59	29,438.46	-	-	3,011,126.13	1,164,212,564.11	373,821.70	1,163,838,742.41	-
3. North America and Latin America	224,224.66	-	-	62.44	224,162.22	39,410,931.10	-	39,410,931.10	-
4. Africa and Middle East	4,279.22	4,279.22	-	-	-	-	-	-	-
5. Europe	1,592,964.65	-	-	18,085.07	1,574,879.58	194,264,173.82	3,001.61	194,261,172.21	-
6. Others	2,996.16	-	-	2,996.16	-	-	-	-	-
Total	70,476,037.04	26,462,159.44	30,087,295.37	421,728.99	13,504,853.24	2,475,542,486.24	783,044.89	2,473,454,253.15	1,305,188.20

* Commercial banks shall classify countries or geographic areas according to guidelines used in their internal management and shall explain supporting reasons

^{1/} Including accrued interest receivables and net of deferred incomes, allowances for doubtful accounts and allowances for revaluation from debt restructuring and including net loans of interbank and money market.

^{2/} Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for impairment of securities

^{3/} Before multiplying credit conversion factor

Outstanding amounts of on-balance sheet assets and off balance sheet items before credit risk mitigation classified by residual

Unit : TTHB

Item	2019		
	Maturity not exceeding 1 year	Maturity exceeding 1 year	Total
1. On-balance sheet assets (1.1 + 1.2 + 1.3)	57,199,772.88	25,312,487.73	82,512,260.61
1.1 Net loans ^{1/}	36,749,385.00	641,669.23	37,391,054.23
1.2 Net Investment in debt securities ^{2/}	13,382,067.87	12,920,805.03	26,302,872.90
1.3 Deposits (including accrued interest receivables)	642,809.86	-	642,809.86
1.4 Derivatives	6,425,510.15	11,750,013.47	18,175,523.62
2. Off-balance sheet items ^{3/} (2.1 + 2.2 + 2.3)	856,262,152.20	696,733,825.29	1,552,995,977.49
2.1 Aval of bills, guarantees, and letter of credits	251,264.05	-	251,264.05
2.2 OTC derivatives	854,753,700.56	696,338,034.36	1,551,091,734.92
2.3 Undrawn committed line	1,257,187.59	395,790.93	1,652,978.52

Unit : TTHB

Item	2018		
	Maturity not exceeding 1 year	Maturity exceeding 1 year	Total
1. On-balance sheet assets (1.1 + 1.2 + 1.3)	52,087,206.80	18,388,830.22	70,476,037.02
1.1 Net loans ^{1/}	25,506,577.34	955,582.11	26,462,159.45
1.2 Net Investment in debt securities ^{2/}	20,908,957.80	9,178,337.56	30,087,295.36
1.3 Deposits (including accrued interest receivables)	421,728.98	-	421,728.98
1.4 Derivatives	5,249,942.68	8,254,910.55	13,504,853.23
2. Off-balance sheet items ^{3/} (2.1 + 2.2 + 2.3)	1,304,272,829.28	1,171,269,656.95	2,475,542,486.23
2.1 Aval of bills, guarantees, and letter of credits	409,223.19	373,821.70	783,044.89
2.2 OTC derivatives	1,302,671,000.43	1,170,783,252.71	2,473,454,253.14
2.3 Undrawn committed line	1,192,605.66	112,582.54	1,305,188.20

^{1/} Including accrued interest receivables and net of deferred incomes, allowances for doubtful accounts and allowances for revaluation from debt restructuring and including net loans of interbank and money market.

^{2/} Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for impairment of securities

^{3/} Before multiplying credit conversion factor

Outstanding amounts of loans including accrued interest receivables and investment in debt securities before adjusted by credit risk mitigation classified by country or geographical area of debtor* and asset classification as prescribed by the Bank of Thailand

Unit : TTHB

Country or geographic area of debtor	2019						Specific provision for Investment in debt securities ^{2/}
	Loans including accrued interest receivables ^{1/}						
	Normal	Special mentioned	Substandard	Doubtful	Doubtful loss	Total	
1. Thailand	37,335,577.69	348,909.90	-	-	49,401.23	37,733,888.82	26,302,872.91
2. Asia Pacific (exclude Thailand)	-	-	-	-	-	-	-
3. North America and Latin America	-	-	-	-	-	-	-
4. Africa and Middle East	-	-	-	-	-	-	-
5. Europe	-	-	-	-	-	-	-
6. Others	-	-	-	-	-	-	-
Total	37,335,577.69	348,909.90	-	-	49,401.23	37,733,888.82	26,302,872.91

Unit : TTHB

Country or geographic area of debtor	2018						Specific provision for Investment in debt securities ^{2/}
	Loans including accrued interest receivables ^{1/}						
	Normal	Special mentioned	Substandard	Doubtful	Doubtful loss	Total	
1. Thailand	26,428,600.49	282,084.81	-	-	53,162.44	26,763,847.74	30,087,295.37
2. Asia Pacific (exclude Thailand)	29,438.46	-	-	-	-	29,438.46	-
3. North America and Latin America	-	-	-	-	-	-	-
4. Africa and Middle East	4,279.22	-	-	-	-	4,279.22	-
5. Europe	0.00	-	-	-	-	0.00	-
6. Others	-	-	-	-	-	-	-
Total	26,462,318.17	282,084.81	-	-	53,162.44	26,797,565.43	30,087,295.37

* Commercial banks shall classify countries or geographic areas according to guidelines used in their internal management and shall explain supporting reasons

^{1/} Including outstanding amounts of loans and interest receivable receivables of interbank and money market

^{2/} Including investments in receivables

Provisions (General provision and Specific provision) and bad debt written-off during period for loan including accrued interest receivables and investment in debt securities classified by country or geographic area*

Unit : TTHB

2019				
Country or geographic area of debtor	Loans including accrued interest receivables ^{1/}			Specific provision for investment in debt securities ^{3/}
	General provision	Specific provision	Bad debt written-off during period	
1. Thailand		56,337.98	-	6,907.29
2. Asia Pacific (exclude Thailand)		-	-	-
3. North America and Latin America		-	-	-
4. Africa and Middle East		-	-	-
5. Europe		-	-	-
6. Others		-	-	-
Total	269,047.53	56,337.98	-	6,907.29

Unit : TTHB

2018				
Country or geographic area of debtor	Loans including accrued interest receivables ^{1/}			Specific provision for investment in debt securities ^{3/}
	General provision	Specific provision	Bad debt written-off during period	
1. Thailand		58,748.38	-	18,431.43
2. Asia Pacific (exclude Thailand)		-	-	-
3. North America and Latin America		-	-	-
4. Africa and Middle East		-	-	-
5. Europe		-	-	-
6. Others		-	-	-
Total	262,161.61	58,748.38	-	18,431.43

* Commercial banks shall classify countries or geographic areas according to guidelines used in their internal management and shall explain supporting reasons.

^{1/} Including provision and bad debt written-off during period of loans including accrued interest receivables of interbank and money market

^{2/} Disclosed in total amount

^{3/} Including investments in receivables

Outstanding amount of loans including accrued interests* before adjusted by credit risk mitigation classified by type of business and by asset classification specified by the Bank of Thailand

Unit : TTHB

2019						
Type of business	Normal	Special mentioned	Substandard	Doubtful	Doubtful loss	Total
- Agriculture and mining					49,401.23	49,401.23
- Manufacturing and commerce	11,299,628.23	209,985.26				11,509,613.49
- Real estate business and construction	318,296.99	-				318,296.99
- Public utilities and services	405,781.69	23,938.17				429,719.86
- Housing loans						-
- Others (Commercial banks shall use their own's discretion to determine significance)						
1. Finance business group	25,298,178.69	114,986.47				25,413,165.16
2. Multilateral organization						-
3. Other service	13,692.09					13,692.09
4. Commodities						-
Total	37,335,577.69	348,909.90	-	-	49,401.23	37,733,888.82

Unit : TTHB

2018						
Type of business	Normal	Special mentioned	Substandard	Doubtful	Doubtful loss	Total
- Agriculture and mining					53,162.44	53,162.44
- Manufacturing and commerce	12,266,486.06	264,076.04	-	-	-	12,530,562.09
- Real estate business and construction	308,585.69	-				308,585.69
- Public utilities and services	3,261,176.40	18,008.78				3,279,185.18
- Housing loans						-
- Others (Commercial banks shall use their own's discretion to determine significance)						
1. Finance business group	10,626,070.02					10,626,070.02
2. Multilateral organization						-
3. Other service						-
4. Commodities						-
Total	26,462,318.17	282,084.81	-	-	53,162.44	26,797,565.42

* Including outstanding amount of loans including accrued interest receivables of interbank and money market

Provisions (General provision and Specific provision) and bad debt written-off during period for loans including accrued interest receivables* classified by types of business

Unit : TTHB

Type of business	2019			2018		
	General provision	Specific provision	Bad debt written-off during period	General provision	Specific provision	Bad debt written-off during period
- Agriculture and mining		49,401.25	-		53,162.44	-
- Manufacturing and commerce		4,158.47	-		5,225.94	-
- Real estate business and construction			-		-	-
- Public utilities and services		478.65	-		360.00	-
- Housing loans			-		-	-
- Others (Commercial banks shall use their own's discretion to determine significance)		2,299.61	-		-	-
Total	269,047.53	56,337.98	-	262,161.61	58,748.38	-

* Including outstanding amount of loans including accrued interest receivables of interbank and money market

^{1/} Disclosed in total amount

Reconciliation of change in provisions (General provision and Specific provision) for loans including accrued interest receivables*

Unit : TTHB

Item	2019			2018		
	General provision	Specific provision	Total	General provision	Specific provision	Total
Provisions at the beginning of the period	262,161.61	58,748.37	320,909.98	254,908.80	55,477.98	310,386.78
Bad debts written-off during the period			-		-	-
Increases or Decreases of provisions during the period	6,885.92	1,350.81	8,236.73	7,252.81	3,649.00	10,901.81
Other provisions (provisions for losses from foreign exchange, provisions)		(3,761.20)	(3,761.20)		(378.60)	(378.60)
Provisions at the end of the period	269,047.53	56,337.98	325,385.51	262,161.61	58,748.38	320,909.99

* Including outstanding amount of loans including accrued interest receivables of interbank and money market

Outstanding amounts of on-balance sheet assets and off-balance sheet items* classified by type of assets under the SA

Unit :TTHB

Type of asset	2019			2018		
	On balance sheet assets	Off balance sheet item **	Total	On balance sheet assets	Off balance sheet item **	Total
1. Performing claims						
1.1 Claims on sovereigns and central banks, multilateral development banks (MDBs), and non-central government public sector entities (PSEs) treated as claims on sovereigns	598,524.21	-	598,524.21	399,503.36	-	399,503.36
1.2 Claims on financial institutions , non-central government public sector entities (PSEs) treated as claims on financial institutions, and securities firms	7,654,242.97	35,711,255.93	43,365,498.90	5,076,354.14	25,400,277.77	30,476,631.91
1.3 Claims on corporates , non-central government public sector entities (PSEs) treated as claims on corporate	19,940,204.62	10,255,527.79	30,195,732.41	21,689,535.24	13,024,283.88	34,713,819.12
1.4 Claims on retail portfolios	-	-	-	-	-	-
1.5 Housing loans	-	-	-	-	-	-
1.6 Other assets	18,424,592.71	-	18,424,592.71	13,769,189.17	-	13,769,189.17
2. Non-performing claims						
3. First-to-default credit derivatives and Securitisation						
Total	46,617,564.51	45,966,783.72	92,584,348.23	40,934,581.91	38,424,561.65	79,359,143.56

* After multiplying with credit conversion factor and specific provision

** Including all Repo-style transactions (including Reverse repo transactions)

Credit risk exposure under the Standardized Approach (SA)

Deutsche Bank AG, Bangkok Branch calculates regulatory capital requirement for credit risk using the Standardized Approach (SA) methodology according to the Bank of Thailand's notification Re: Regulations for Credit Risk Asset Calculations for Commercial Banks Using the Standardized Approach (SA).

In setting risk weights of claims on sovereigns and central banks, claims on financial institutions, claims on securities companies and claims non-central government public sector entities (PSEs) treated as claims on sovereigns and treated as claims on financial institutions, Deutsche Bank use countries rating assessed by External Credit Assessment Institutions (ECAIs) as below:

1. Standard and Poor's
2. Moody's Investors Service
3. Fitch Ratings (Thailand)

In the absence of credit rating from ECAIs, then the rating of the country risk classification of OECD will be used.

In setting risk weights of claims on corporate and claims non-central government public sector entities (PSEs) treated as claims on corporate, Deutsche Bank use rating assessed by External Credit Assessment Institutions (ECAIs) as below:

1. Standard and Poor's
2. Moody's Investors Service
3. Fitch Ratings (Thailand)
4. TRIS Rating

For Fitch Ratings (Thailand), Deutsche Bank use Senior Unsecured Debt rating while for TRIS Rating, Deutsche Bank use company rating.

Deutsche Bank then match the debtor's credit rating given by ECAIs with the rating grade as set out in the Bank of Thailand's notification in order to identify the risk weights by type of claims on each debtor.

Setting Risk Weights given Multiple Credit Ratings

- Where the claim/debtor has 1 credit rating from the selected ECAI, Deutsche Bank use that rating to assign the risk weight for that claim/debtor.
- Where there are 2 different credit ratings from the selected ECAI with varying risk weights, Deutsche Bank use the higher risk weight.
- Where there are more than 2 credit ratings from the selected ECAI with varying risk weights, Deutsche Bank compare the two lowest risk weights, and use the higher risk weight; except where 2 or more credit ratings correspond to the lowest risk weight, Deutsche Bank use that risk weight.

The table below represents outstanding amount of net on-balance sheet assets and off-balance sheet items (after multiplying credit conversion factor) after adjusted by credit risk mitigation for each type of asset, classified by risk weight under the Standardized Approach (SA) as at 31 December 2019 and 2018.

Credit risk exposures under the SA*
Outstanding amount of net on-balance sheet assets and off-balance sheet items* after adjusted by credit risk mitigation for each type of asset, classified by risk weight under the SA Unit : THB

Type of asset	2019					
	Rated outstanding amount				Unrated outstanding amount	
Risk weight (%)	0	20	50	100	150	100
Performing claims						
1. Claims on sovereigns and central banks, multilateral development banks (MDBs), and non-central government public sector entities (PSEs) treated as claims on sovereigns	598,524.21	-	-	-	-	-
2. Claims on financial institutions, non-central government public sector entities (PSEs) treated as claims on financial institutions, and securities firms	195,063.72	16,030,922.65	2,471,887.15	14,566,345.66	-	-
3. Claims on corporates, non-central government public sector entities (PSEs) treated as claims on corporate	21,061.34	155,258.40	1,837,735.13	-	-	28,146,879.32
4. Claims on retail portfolios						-
5. Claims on housing loans						-
6. Other assets						18,364,815.24
						59,777.47
Risk weight (%)			50	100	150	
Non-performing claims						
Capital deduction items prescribed by the Bank of Thailand						

Type of asset	2018					
	Rated outstanding amount				Unrated outstanding amount	
Risk weight (%)	0	20	50	100	150	100
Performing claims						
1. Claims on sovereigns and central banks, multilateral development banks (MDBs), and non-central government public sector entities (PSEs) treated as claims on sovereigns	399,503.36	-	-	-	-	-
2. Claims on financial institutions, non-central government public sector entities (PSEs) treated as claims on financial institutions, and securities firms	351,764.36	16,201,679.51	1,577,177.27	12,149,463.75	-	-
3. Claims on corporates, non-central government public sector entities (PSEs) treated as claims on corporate	118,640.50	3,302,426.85	848,712.86	-	-	30,410,129.15
4. Claims on retail portfolios						-
5. Claims on housing loans						-
6. Other assets						13,718,587.42
						50,601.75
Risk weight (%)			50	100	150	
Non-performing claims						
Capital deduction items prescribed by the Bank of Thailand						

* After multiplying credit conversion factor

^{1/} For the portion claims with no credit risk mitigation of which risk weight are determined by the proportion of provision to total amount of claims

Credit risk mitigation under the Standardized Approach (SA)

Credit Risk Mitigation Techniques

In addition to determining counterparty credit quality and the risk appetite, the Bank also uses various credit risk mitigation techniques to optimize credit exposure and reduce potential credit losses. Credit risk mitigants are applied in the following forms:

- Comprehensive and enforceable credit documentation with adequate terms and conditions.
- Collateral held as security to reduce losses by increasing the recovery of obligations.
- Risk transfers, which shift the probability of default risk of an obligor to a third party including hedging executed by our Credit Portfolio Strategies Group.
- Netting and collateral arrangements which reduce the credit exposure from derivatives and repo- and repo-style transactions.

Collateral Held as Security

The Bank regularly agrees on collateral to be received from or to be provided to customers in contracts that are subject to credit risk. Collateral is security in the form of an asset or third-party obligation that serves to mitigate the inherent risk of credit loss in an exposure, by either substituting the borrower default risk or improving recoveries in the event of a default. While collateral can be an alternative source of repayment, it generally does not replace the necessity of high quality underwriting standards.

We segregate collateral received into the following two types:

- Financial and other collateral, which enables us to recover all or part of the outstanding exposure by liquidating the collateral asset provided, in cases where the borrower is unable or unwilling to fulfill its primary obligations. Cash collateral, securities (equity, bonds), and collateral assignments of other claims or inventory, equipment (i.e., plant, machinery) and real estate typically fall into this category.
- Guarantee collateral, which complements the borrower's ability to fulfill its obligation under the legal contract and as such is provided by third parties. Letters of credit, insurance contracts, export credit insurance, guarantees, credit derivatives and risk participations typically fall into this category.

Our processes seek to ensure that the collateral we accept for risk mitigation purposes is of high quality. This includes seeking to have in place legally effective and enforceable documentation for realizable and measureable collateral assets which are evaluated regularly by dedicated teams. The assessment of the suitability of collateral for a specific transaction is part of the credit decision and must be undertaken in a conservative way, including collateral haircuts that are applied. We have collateral type specific haircuts in place which are regularly reviewed and approved. In this regard, we strive to avoid "wrong-way" risk characteristics where the borrower's counterparty risk is positively correlated with the risk of deterioration in the collateral value. For guarantee collateral, the process for the analysis of the guarantor's creditworthiness is aligned to the credit assessment process for borrowers.

Risk Transfers

Risk transfers to third parties form a key part of our overall risk management process and are executed in various forms, including outright sales, single name and portfolio hedging, and securitizations. Risk transfers are conducted by the respective business units.

Netting and Collateral Arrangements for Derivatives and Securities Financing Transactions

Netting is applicable to over-the-counter ("OTC") derivative transactions. Netting is also applied to securities financing transactions as far as documentation, structure and nature of the risk mitigation allow netting with the underlying credit risk.

In order to reduce the credit risk resulting from OTC derivative transactions, where CCP clearing is not available, the Bank regularly seeks the execution of standard master agreements (such as master

agreements for derivatives published by the International Swaps and Derivatives Association, Inc. (ISDA) with our counterparts. A master agreement allows for the close-out netting of rights and obligations arising under derivative transactions that have been entered into under such a master agreement upon the counterparty's default, resulting in a single net claim owed by or to the counterparty. For parts of the derivatives business (i.e., foreign exchange transactions) we also enter into master agreements under which payment netting applies in respect to transactions covered by such master agreements, reducing our settlement risk. In our risk measurement and risk assessment processes we apply close-out netting only to the extent we have satisfied ourselves of the legal validity and enforceability of the master agreement in all relevant jurisdictions.

Also, we enter into credit support annexes ("CSA") to master agreements in order to further reduce our derivatives-related credit risk. These annexes generally provide risk mitigation through periodic, usually daily, and margining of the covered exposure. The CSAs also provide for the right to terminate the related derivative transactions upon the counterparty's failure to honor a margin call. As with netting, when we believe the annex is enforceable, we reflect this in our exposure measurement.

Certain CSAs to master agreements provide for rating dependent triggers, where additional collateral must be pledged if a party's rating is downgraded. We also enter into master agreements that provide for an additional termination event upon a party's rating downgrade. These downgrading provisions in CSAs and master agreements usually apply to both parties but may also apply to us only. We analyze and monitor our potential contingent payment obligations resulting from a rating downgrade in our stress testing approach for liquidity risk on an ongoing basis.

Concentrations within Credit Risk Mitigation

Concentrations within credit risk mitigations taken may occur if a number of guarantors and credit derivative providers with similar economic characteristics are engaged in comparable activities with changes in economic or industry conditions affecting their ability to meet contractual obligations. We use a range of quantitative tools and metrics to monitor our credit risk mitigating activities. These also include monitoring of potential concentrations within collateral types.

The following table represents credit risk mitigation under the Standardized Approach (SA) as at 31 December 2019 and 2018.

Credit risk mitigation* under SA

Part of outstanding that is secured by collateral under SA classified by type of assets and collateral

Unit : TTHB

Type of asset	2019		2018	
	Eligible financial collateral ^{1/}	Guarantee and credit derivatives	Eligible financial collateral ^{1/}	Guarantee and credit derivatives
Performing assets				
1 Claims on sovereigns and central banks, multilateral development banks (MDBs), and non-central government public sector entities (PSEs) treated as claims on sovereigns	-	-	-	-
2 Claims on financial institutions, non-central government public sector entities (PSEs) treated as claims on financial institutions, and securities firms	10,101,279.73	-	196,547.02	-
3 Claims on corporates, non-central government public sector entities (PSEs) treated as claims on corporate	34,798.22	-	33,909.77	-
4 Claims on retail portfolios	-	-	-	-
5 Claims on housing loans	-	-	-	-
6 Other assets	-	-	-	-
Non-performing assets				
Substandard assets				
Total	10,136,077.95	-	230,456.79	-

* Excluding securitisation.

** Values after on-balance sheets and off-balance sheets netting

^{1/} Eligible financial collateral that the Bank of Thailand allows to use for risk mitigation. The value after haircut.

Market risk

Deutsche Bank AG, Bangkok Branch uses Internal Model Approach for internal risk management.

Market risk exposure under the Standardized Approach (SA)

Deutsche Bank AG, Bangkok Branch calculates regulatory capital requirement for market risk using the Standardized Approach (SA) methodology according to the Bank of Thailand's notification Re: Market Risk Supervision Guidelines for Financial Institutions.

The table below represents minimum capital requirements for each type of market risk under the Standardized Approach (SA) as at 31 December and 30 June 2019.

Market risk under the Standardised Approach

Minimum capital requirements for each type of market risk under the Standardised Approach

Unit: TTHB

Minimum capital requirements for market risk under the Standardized Approach	Dec-19	Jun-19
Interest rate risk	2,142,002.79	2,964,261.72
Equity position risk	-	-
Foreign exchange rate risk	1,162,726.35	1,011,950.61
Commodity risk	-	-
Total minimum capital requirements	3,304,729.14	3,976,212.33

Trading Market Risk

Market Risk

The vast majority of the Group's businesses are subject to market risk, defined as the potential for change in the market value of the Group's trading and non-trading positions. Risk can arise from adverse changes in interest rates, credit spreads, foreign exchange rates, equity prices, commodity prices and other relevant parameters, such as market volatility and market implied default probabilities.

The primary objective of Market and Valuation Risk Management (MVRM), as part of the Group's independent Risk function, is to ensure that the business units optimize the risk-reward relationship and do not expose the Group to unacceptable losses outside of its risk appetite. To achieve this objective, MVRM works closely together with risk takers ("the business units") and other control and support groups.

The Group differentiates between three substantially different types of market risk:

- **Trading market risk** arises primarily through the market-making activities of the Corporate and Investment Bank Division. This involves taking positions in debt, equity, foreign exchange, or other securities and commodities as well as in equivalent derivatives.
- **Traded default risk** arising from defaults and rating migrations.

- **Non-trading market risk** arises in various forms. Equity risk arises primarily from non-consolidated strategic investments, alternative asset investments and equity compensation. Interest rate risk stems from the Group's non-trading asset and liability positions. Structural foreign exchange risk exposure arises from capital and retained earnings in non-euro currencies in certain subsidiaries, and represents the bulk of foreign exchange risk in the Group's non-trading portfolio. Other non-trading market risk elements are risks arising from asset management and fund related activities as well as model risks in Private Business Clients ("PBC"), Global Transaction Banking ("GTB") and Private Wealth Management ("PWM"), which are derived by stressing assumptions of client behavior in combination with interest rate movements.

Trading Market Risk Management Framework

Trading Market Risk Management Framework at Deutsche Bank

The Group's primary instrument to manage trading market risk is the limit setting process. The Group's Management Board, supported by Market and Valuation Risk Management, sets Group-wide Value-at-Risk and Economic Capital limits for market risk in the trading book. MVRM sub-allocates this overall limit to the Group's divisions and individual business units within Corporate and Investment Bank (e.g. FIC, Equity, etc.) based on anticipated business plans and risk appetite. Within the individual business units, the business heads establish business limits, by sub-allocating the overall limit down to individual portfolios or geographical regions.

In practice, MVRM sets key limits, which tend to be global in nature, necessary to capture an exposure to a particular risk factor. Business limits are specific to various factors, including a particular geographical region or specific portfolio.

Value-at-risk and Economic Capital limits are used for managing relevant types of market risk at an overall portfolio level. As an additional and complementary tool for managing certain portfolios or risk types, MRM sets sensitivity and concentration/liquidity limits.

Business units are responsible for adhering to the limits against which exposures are monitored and reported. The market risk limits set by MVRM are monitored on a daily, weekly and monthly basis. Where limits are exceeded, MVRM is responsible for identifying and escalating those excesses, on a timely basis.

To manage the exposures inside the limits, the business units apply several risk mitigating measures, most notably the use of:

- Portfolio management: Risk diversification arises in portfolios which consist of a variety of positions. Since some investments are likely to rise in value when others decline, diversification can help to lower the overall level of risk profile of a portfolio.
- Hedging: Hedging involves taking positions in related financial assets, including derivative products, such as futures, swaps and options. Hedging activities may not always provide effective mitigation against losses due to differences in the terms, specific characteristics or other basis risks that may exist between the hedge instrument and the exposure being hedged.

Quantitative Risk Management Tools

- **Value-at-Risk**
- Value-at-risk is a quantitative measure of the potential loss (in value) of trading positions due to market movements that will not be exceeded in a defined period of time and with a defined confidence level.

- The Group's Value-at-Risk for the trading businesses is based on its own internal Value-at-Risk model. Deutsche Bank AG, Bangkok Branch uses VaR measurements only for internal control purposes. Deutsche Bank AG, Bangkok Branch's Regulatory Capital requirement for market risk is calculated using Standardized Approach.
- Deutsche Bank calculates value-at-risk using a 99% confidence level and a one day holding period. This means Deutsche Bank estimates there is a 1 in 100 chance that a mark-to-market loss from our trading positions will be at least as large as the reported value-at-risk.
- Deutsche Bank uses one-year historical market data to calculate value-at-risk. The calculation employs a Monte Carlo simulation technique, and Deutsche Bank assumes that changes in risk factors follow a well-defined distribution, e.g. normal, lognormal, or non-normal (T, skew-T, Skew-Normal). To determine its aggregated Value-at-Risk, Deutsche Bank uses observed correlations between the risk factors during this one-year period.
- Our VaR model is designed to take into account the following risk factors: interest rates, credit spreads, equity prices, foreign exchange rates and commodity prices, as well as their implied volatilities and common basis risk. The model incorporates both linear and, especially for derivatives, nonlinear effects of the risk factors on the portfolio value.
- The VaR measure enables us to apply a constant and uniform measure across trading businesses and products. It allows a comparison of risk in different businesses, and also provides a means of aggregating and netting positions within a portfolio to reflect correlations and offsets between different asset classes. Furthermore, it facilitates comparisons of our market risk both over time and against our daily trading results.
- Back-testing provides an analysis of the predictive ability of the value-at-risk calculations based on actual experience. Deutsche Bank compares the hypothetical daily profits and losses under the buy-and-hold assumption with the estimates from our value-at-risk model.
- A committee chaired by MVRM and with participation from Market Risk Analysis and Control (MRAC), Finance and others, meets every month to discuss back-testing results of Deutsche Bank AG, Bangkok Branch and of individual businesses. The committee analyzes performance fluctuations and assesses the predictive ability of our VaR model, which in turn allows us to improve the risk estimation process.
- **Sensitivities**
- Sensitivities show the effect on mark to market P&L of a change in an underlying risk factor. Sensitivities are typically used at a desk level by traders to micro-manage their position on an intra-day basis.
- Sensitivities are able to describe the economic effects of risks not catered for by other risk measures (such as VAR) and can be aggregated across numerous businesses which take similar risk. The sensitivities are reflected on the Daily Risk Report which provides an aggregated picture of Deutsche Bank AG, Bangkok Branch's market risk exposure for close of business on the previous day.
- **Stress Testing and Event Risk Scenarios (ERS)**
- A key limitation of VaR is that it is based on relatively recent historical data, and therefore typically reflects losses only under normal market conditions. To address this, Deutsche Bank performs stress tests in which the bank values its trading portfolios under extreme market scenarios not covered by the confidence interval of our VaR model.
- The stress tests can be derived from historically observed severe market shocks or by creating hypothetical scenarios.

- Deutsche Bank AG, Bangkok Branch performs three different types of stress tests to investigate the potential losses under crisis scenario on weekly basis. Global Market Stress Testing - under which the, Bangkok Branch's positions in each currency are stressed to see the potential loss under various crisis situations, e.g. foreign currency devaluation, shock in interest rate market and etc. This is the main stress test for Deutsche Bank AG, Bangkok Branch.
- Deutsche Bank also performs Foreign Exchange Options Stress Tests and Interest Rate Options Stress Test which complements the Global Market Stress Tests and involves non-linear effects from options portfolio that is not captured by Global Market Stress Tests.
- For Emerging Markets, including Thailand, the Group calculates country-specific Event Risk Scenario (ERS) stress test and assesses the results of such event risks. A specialist committee reviews the country risk ratings and scenario loss limits monthly. Ad hoc reviews take place as required. For each major emerging markets country (determined by the size of Deutsche Bank's activities in the country), a "tailor-made" stress scenario is determined, which covers a combination of market disruptions affecting the major risk factors based on historically observable events or hypothetical situations. By and large, these scenarios are a combination of FX devaluation, credit spreads widening, increasing interest rates and depreciating equity prices..
- Our stress testing results are necessarily limited by the number of stress tests executed and the fact that not all downside scenarios can be predicted and simulated. While our risk managers have used their best judgment to define worst case scenarios based upon the knowledge of past extreme market moves, it is possible for our market risk positions to lose more value than even our estimates. Deutsche Bank also continuously assesses and refines its stress tests in an effort to ensure they capture material risks as well as reflect possible extreme market moves.
- **Value-at-Risk of Trading Units of Deutsche Bank AG, Bangkok Branch**
- The following table shows the value-at-risk (with a 99 % confidence level and a one-day holding period) of the trading units of Deutsche Bank AG, Bangkok Branch. "Diversification effect" reflects the fact that the total value-at-risk on a given day will be lower than the sum of the values-at-risk relating to the individual risk classes. Simply adding the value-at-risk figures of the individual risk classes to arrive at an aggregate value-at-risk would imply the assumption that the losses in risk categories occur simultaneously.

Value-at-risk of trading units in EUR, million			
	Dec 31, 2019	Dec 31, 2018	Dec 29, 2017
Interest rate risk	0.5	0.6	0.3
Foreign exchange risk	0.4	0.6	0.4
Commodity price risk	0	0	0
Equity price risk	0	0	0
Diversification effect	-0.2	-0.4	-0.2
Total	0.7	0.8	0.5

Backtesting of Trading Market Risk

Backtesting is a procedure used to verify the predictive ability of the VaR calculations involving the comparison of hypothetical daily profits and losses under the buy-and-hold assumption with the estimates from the value-at-risk model. An outlier is a hypothetical buy-and-hold trading loss that exceeds the Group's value-at-risk estimate.

DB AG Bangkok had two negative outliers in 2019. Deutsche Bank continues to believe that our value-at-risk model will remain an appropriate measure for our trading market risk under normal market conditions.

- **Interest Rate Risk in the Banking Book**

- In DB, the majority of the interest rate risk arising from non-trading asset and liability positions is transferred through internal hedges to Treasury and is thus managed on the basis of Banking Book Value-at-Risk.

Operational Risk

Deutsche Bank's operational risk appetite sets out the amount of operational risk we are willing to accept as a consequence of doing business. We take on operational risks consciously, both strategically as well as in day-to-day business. While the bank may have no appetite for certain types of operational risk events (such as violations of laws or regulations and misconduct), in other cases a certain amount of operational risk must be accepted if the bank is to achieve its business objectives. In case a residual risk is assessed to be outside our risk appetite, risk reducing actions must be undertaken including remediating the risks, insuring risks or ceasing business.

The Operational risk management framework (ORMF) is a set of interrelated tools and processes that are used to identify, assess, measure, monitor and remediate the bank's operational risks. Its components have been designed to operate together to provide a comprehensive but risk-based approach to managing the bank's most material operational risks. ORMF components include the Group's approach to setting and adhering to operational risk appetite, the operational risk type and control taxonomies, the minimum standards for operational risk management processes including tools, and the bank's operational risk capital model.

Organisational and Governance Structure for Thailand

The roles and responsibilities of the NFRM function with respect to Country Coverage are defined as part of the 'Operational Risk Country Coverage Key Operating Document'.

The lead country coverage risk manager in NFRM Thailand is responsible for overseeing the adequate implementation of the local NFRM governance process in Thailand.

The lead country coverage risk manager in NFRM for Thailand is a permanent member of the Thailand Operating Council ("TOC") and updates the committee about the non-financial risk profile of the country through the Country Risk Profile that includes, but is not limited to:

- The aggregated operational loss reporting and outline of material events
- Country Risk Rating and Top Risk Theme
- Operational risk capital developments
- Overview of the management of issues and findings

Organisational and Governance Structure for DB Group (Global):

While the day-to-day management of Operational Risk is the primary responsibility of our business divisions and infrastructure functions as risk owners, Non-Financial Management (NFRM) oversees the Group-wide management of operational risks, identifies and reports risk concentrations and promotes a consistent application of the ORMF across the Bank. NFRM is part of the Group Risk function which is headed by the Chief Risk Officer.

The Chief Risk Officer appoints the Head of Non-Financial Risk Management who is accountable for the design, implementation and maintenance of an effective, efficient and regulatory compliant ORMF, including

the Operational Risk capital model. The Head of NFRM monitors and challenges the ORMF's implementation and monitors overall risk levels against risk appetite.

The Non-Financial Risk Committee ("NFRC"), which is chaired by the Chief Risk Officer is responsible for the oversight, governance and coordination of the management of Operational Risk in the Group on behalf of the Management Board by establishing a cross-risk perspective of the key operational risks of the Group. Its decision-making and policy related authorities include the review, advice and management of all Operational Risk issues which may impact the risk profile of our business divisions and infrastructure functions. Several sub-fora with attendees from both, the 1st and 2nd LoDs support the Non-Financial Risk Committee (NFRC) to effectively fulfil its mandate. In addition to the Group level NFRC, business divisions have established 1st LoD governance fora for the oversight and management of operational risks on various levels of the organization.

The governance of our operational risks follows the bank's Three Lines of Defence (3LoD) approach to managing all of its financial and non-financial risks. The ORMF establishes the operational risk governance standards including the core 1st and 2nd LoD roles and their responsibilities, to ensure effective risk management and appropriate independent challenge:

Operational risk governance standard for the first line of defence (1st LoD): Risk owners as the 1st LoD have full accountability for their operational risks and manage these against a defined risk specific appetite.

Risk owners are those roles in the bank whose (business) activities generate risks. As heads of business divisions and infrastructure functions, they must determine the appropriate organizational structure to identify their organizations' operational risk profile, implement risk management and control standards within their organization, take business decisions on the mitigation or acceptance of operational risks to ensure they remain within risk appetite and establish and maintain 1st LoD controls.

Operational risk governance standard for the second line of defence (2nd LoD): Risk Type Controllers (RTCs) act as the 2nd LoD control functions for all sub-risk types under the overarching risk type "operational risk".

RTCs establish the framework and define Group level risk appetite statements for the specific operational risk type they oversee. RTCs define the fundamental risk management and control standards and independently oversee and challenge risk owners' implementation of these standards in their day-to-day processes, as well as their risk-taking and management activities. RTCs establish independent operational risk governance and prepare aggregated risk type profile reporting. RTCs monitor the risk type's profile against risk appetite and exercise a veto on risk decisions leading to foreseeable risk appetite breaches. As risk type experts, RTCs define the risk type and its taxonomy and support and facilitate the implementation of the risk type framework in the 1st LoD. To maintain their independence, RTC roles are located only in infrastructure functions.

Operational risk governance standard for NFRM as the RTC for the overarching risk type operational risk: As the RTC / risk control function for operational risk, NFRM establishes and maintains the overarching ORMF and determines the appropriate level of capital to underpin the Group's operational risk.

- As the 2nd LoD risk control function, NFRM defines the bank's approach to operational risk appetite and monitors its adherence, breaches and consequences. NFRM is the independent reviewer and challenger of the 1st LoD's risk and control assessments and risk management activities. NFRM provides the oversight of risk and control mitigation plans to return the bank's operational risk to its risk appetite, where required. It also establishes and regularly reports the bank's operational risk profile and operational top risks, i.e. the bank's material operational risks which are outside of risk appetite.
- As the subject matter expert for operational risk, NFRM provides independent risk views to facilitate forward-looking management of operational risks, actively engages with risk owners (1st LoD) and facilitates the implementation of risk management and control standards across the bank.

- NFRM is accountable for the design, implementation and maintenance of the approach to determine the adequate level of capital required for operational risk, for recommendation to the Management Board. This includes the calculation and allocation of operational risk capital demand and expected loss under the Advanced Measurement Approach (AMA).

Managing Our Operational Risk

In order to manage the broad range of sub-risk types underlying operational risk, the ORMF provides a set of tools and processes that apply to all operational risk types across the bank. These enable us to determine our operational risk profile in relation to our risk appetite for operational risk, to systematically identify operational risk themes and concentrations, and to define risk mitigating measures and priorities.

In 2019, we further enhanced the management of operational risks by simplifying our risk management processes, by promoting an active and continuous dialogue between the 1st and 2nd LoDs on operational risks, by strengthening our controls, and by making the management of operational risks more transparent, meaningful and embedded in day-to-day business decisions:

Loss data collection: We collect, categorize and analyze data on internal and relevant external operational risk events (with a P&L impact \geq €10,000 globally and €1,000 locally) in a timely manner. Material operational risk events trigger clearly defined lessons learned and read-across analyses, which are performed in close collaboration between business partners, risk control and other infrastructure functions. Lessons learned reviews analyze the reasons for significant operational risk events, identify their root causes, and document appropriate remediation actions to reduce the likelihood of their reoccurrence. Read across reviews take the conclusions of the lessons learned process and seek to analyze whether similar risks and control weaknesses identified in a lessons learned review exist in other areas of the bank, even if they have not yet resulted in problems. This allows preventative actions to be undertaken. In 2019, we further simplified the event management processes to improve data quality and started the development of a new, convenient to use, event management platform.

We complement our operational risk profile by using a set of scenarios including internal scenarios and relevant external operational risk events provided by an industry database. We thereby systematically utilize information on external loss events occurring in the banking industry to reduce the likelihood of similar incidents happening to us, for example through particular deep dive analyses or risk profile reviews. At the end of 2019, we revised our approach in this area to use scenario analysis more effectively for risk management purposes.

The Risk & Control Assessment process (RCA) comprises of a series of bottom-up assessments of the risks generated by business divisions and infrastructure functions (1st LoDs), the effectiveness of the controls in place to manage them, and the remediation actions required to bring the risks outside of risk appetite back into risk appetite. This enables both the 1st and 2nd LoDs to have a clear view of the bank's material operational risks. In 2019, we launched an integrated risk and control assessment that combined the risk assessments led by Anti-Financial Crime (AFC), Compliance and NFRM in a coordinated way. The coordinated approach aims to improve visibility across various risk types and to streamline risk assessment processes, tools and reporting across the three risk control functions, creating efficiencies and improving engagement. Alongside the integration of risk assessments, we further enhanced the bank's central control inventory and started the development of a new control assurance framework to enhance the transparency of control assurance activities across various levels of the bank.

We regularly report and perform analyses on our top risks to establish they are appropriately mitigated. As all risks, top risks are rated in terms of both the likelihood that they could occur and the impact on the bank should they do so, and through this assessment identified to be particularly material for the bank. The reporting provides a forward-looking perspective on the impact of planned remediation and control enhancements. It also contains emerging risks and themes that have the potential to evolve as a top risk in future. Top risk reduction programs comprise the most significant risk reduction activities that are key to bringing our operational top risk themes back within risk appetite. In 2019, we launched a new reporting

platform, which provides risk managers with greater visibility on the operational risk management data from multiple framework components, thus improving oversight and decision-making capability.

To appropriately identify and manage risks from material change initiatives within the bank, a Transformation Risk Assessment (TRA) process is in place to assess the impact of transformation on the bank's risk profile and control environment. This process considers impacts to both financial and non-financial risk types and is applicable to initiatives including strategic changes, large technology programmes and regulatory projects within the bank. For instance, through the TRA process, the bank prepared in advance for anticipated risks arising from the strategy announcement published in July 2019. This included detailed consideration of risks and mitigants across the bank, their documentation and monitoring, to proactively manage these risks.

NFR appetite is the amount of non-financial risk the bank is willing to accept as a consequence of doing business. The NFR appetite framework provides a common approach to measure and monitor the level of risk appetite across the firm. NFR appetite metrics are used to monitor the operational risk profile against the bank's defined risk appetite, and to alert the organization to impending problems in a timely fashion. In 2019 work was undertaken to further embed risk appetite by standardizing risk appetite statements and enhancing metrics at group, divisional and business unit levels. Further work is underway to cascade adequate metrics down to the appropriate level of the organization.

The findings and issue management process allows the bank to mitigate the risks associated with known control weaknesses and deficiencies, and enables management to make risk-based decisions over the need for further remediation or risk acceptance. Outputs from the findings management process must be able to demonstrate to internal and external stakeholders that the bank is actively identifying its control weaknesses and taking steps to manage associated risks within acceptable levels of risk appetite.

Operational risk type frameworks

The ORMF provides the overarching set of standards, tools and processes that apply to the management of all operational sub-risk types. It is complemented by the operational risk type frameworks, risk management and control standards and tools set up by the respective RTCs for the operational sub-risk types they control. These operational sub-risk types are controlled by various infrastructure functions and include the following:

- The Compliance department performs an independent 2nd level control function that protects the bank's license to operate by promoting and enforcing compliance with the law and driving a culture of compliance and ethical conduct in the bank.
The Compliance department assists the business divisions and works with other infrastructure functions and regulators to establish and maintain a risk-based approach to the management of the bank's compliance risks in accordance with the bank's risk appetite and to help the bank detect, mitigate and prevent breaches of laws and regulations. The Compliance department performs the following principal activities: regulatory engagement and management, collaborating with government & regulatory affairs; acting as a trusted advisor; and identifying, assessing, mitigating, monitoring and reporting on compliance risk. The results of these assessments are regularly reported to the Management Board and Supervisory Board.
- Financial crime risks are managed by our Anti-Financial Crime (AFC) function via maintenance and development of a dedicated program. The AFC program is based on regulatory and supervisory requirements. AFC has defined roles and responsibilities and established dedicated functions for the identification and management of financial crime risks resulting from money laundering, terrorism financing, non-compliance with sanctions and embargoes as well as other criminal activities including fraud, bribery and corruption and other crimes. AFC updates its strategy for financial crime prevention via regular development of internal policies processes and controls, institution-specific risk assessment and staff training.
- The Legal Department (including group governance) is an infrastructure function that is mandated to provide legal advice to the Management Board, the Supervisory Board (to the extent it does not give rise

to conflict of interest), business divisions and infrastructure functions and to support the Management Board in setting up and guarding the Group's governance and control frameworks in respect of the bank's legal and governance risks. This includes in particular but without limitation:

- Advising the Management Board and Supervisory Board on legal aspects of their activities
 - Providing legal advice to all Deutsche Bank units to facilitate adherence to legal and regulatory requirements in relation to their activities respectively
 - Supporting other Deutsche Bank units in managing Deutsche Bank Group's interactions with regulatory authorities
 - Engaging and managing external lawyers used by Deutsche Bank Group
 - Managing Deutsche Bank Group's litigation and contentious regulatory matters, (incl. contentious HR matters), and managing Deutsche Bank Group's response to external regulatory enforcement investigations
 - Advising on legal aspects of internal investigations
 - Setting the global governance framework for Deutsche Bank Group, facilitating its cross-unit application and assessing its implementation
 - Developing and safeguarding efficient corporate governance structures suitable to support efficient decision-making, to align risk and accountability on the basis of clear and consistent roles and responsibilities
 - Maintaining Deutsche Bank Group's framework for policies and procedures and serve as guardian for Group policies and procedures
 - Ensuring appropriate quality assurance around all of the above
- NFRM Product Governance oversee the framework that manages the bank's new product and product lifecycle related risks. The framework establishes a bank wide cross-risk process that includes an assessment of both financial and nonfinancial risks. In 2019, NFRM established Systematic Product Reviews (SPR) for the Investment Bank, including the former Equities business. SPR's are now in place across all DB Group Divisions and are an holistic risk assessment that validates whether a product remains operationally ready and fit for purpose and assesses whether the Bank wants to continue, stop or revise the approved product scope. Furthermore, in 2019, a joint venture between NFRM and the Investment Bank led to the implementation of a daily new product approval breach control which provides alerts to NFRM and business contacts where trading activity is not supported by a New Product Approval (NPA). The output from this control is reviewed by the Trader Mandate Oversight Council which is co-chaired by Risk and the Divisional Control Officer in the Investment Bank. This work has led to a reduction in product risk.
- NFRM is the RTC for a number of operational resilience risks. Its mandate includes controls over transaction processing activities, as well as infrastructure risks to prevent technology or process disruption, maintain the confidentiality, integrity and availability of data, records and information security, and ensure business divisions and infrastructure functions have robust plans in place to recover critical business processes and functions in the event of disruption from technical or building outage, or the effects of cyber-attack or natural disaster as well as any physical security or safety risk. NFRM RTC also manages the risks arising from the bank's internal and external vendor engagements via the provision of a comprehensive third party risk management framework.

Measuring Operational Risks

Measuring Operational Risk within DB AG, Bangkok Branch

For risk management purposes on a global level, the DB Group uses Advanced Measurement Approach ("AMA") methodology across all divisions and legal entities to calculate the regulatory capital requirements for operational risk. Locally, the Bank uses the Basic Indicator Approach ("BIA") to assess its local regulatory capital requirements for operational risk. The operational risk capital charge using BIA is equal to the

average of a fixed percentage (15%) of positive annual gross income over the previous three years. Gross income figures are categorised into twelve quarters (equivalent to three years), and if the annual gross income for any given year is negative or zero, the figure shall not be included for the purposes of calculating the operational risk charge.

Measuring Operational Risk at DB Group

We calculate and measure the regulatory and economic capital requirements for Operational Risk using the Advanced Measurement Approach (“AMA”) methodology. Our AMA capital calculation is based upon the Loss Distribution Approach. Gross losses from historical internal and external loss data (Operational Riskdata eXchange Association consortium data) and external scenarios from a public database (IBM OpData) complemented by internal scenario data are used to estimate the risk profile (i.e., a loss frequency and a loss severity distribution). Our Loss Distribution Approach model includes conservatism by recognizing losses on events that arise over multiple years as single events in our historical loss profile.

Within the Loss Distribution Approach model, the frequency and severity distributions are combined in a Monte Carlo simulation to generate potential losses over a one year time horizon. Finally, the risk mitigating benefits of insurance are applied to each loss generated in the Monte Carlo simulation. Correlation and diversification benefits are applied to the net losses in a manner compatible with regulatory requirements to arrive at a net loss distribution at Group level, covering expected and unexpected losses. Capital is then allocated to each of the business divisions after considering qualitative adjustments and expected loss.

The regulatory capital requirement for Operational Risk is derived from the 99.9 % percentile. Since Q4 2017, the economic capital is also set at 99.9 % percentile. Both regulatory and economic capital requirements are calculated for a time horizon of one year.

The Regulatory and Economic Capital demand calculations are performed on a quarterly basis. NFRM aims to ensure that for the approach for capital demand quantification appropriate development, validation and change governance processes are in place, whereby the validation is performed by an independent validation function and in line with the Group’s model risk management process.

Equity exposure in the banking book

Equity investments which are neither consolidated for regulatory purposes nor deducted from the Group’s own funds are held as equity positions in the regulatory banking book. In the Group’s consolidated balance sheet, these equity investments are either classified as “Financial assets available for sale (“AFS”)” or “Equity method investments”. An immaterial amount of financial assets designated at fair value through profit and loss which are equity interests is included in the banking book.

Accounting and Valuation Policies for Equity Investments

AFS equity instruments are initially recognized at fair value plus transaction costs that are directly attributable to the acquisition of that financial asset. Financial assets classified as AFS are carried at fair value with the changes in fair value generally reported in equity unless the asset is subject to a fair value hedge or is impaired. At each balance sheet date, management assesses whether there is objective evidence that an individual asset is impaired. Objective evidence of impairment includes a significant or prolonged decline in the fair value of the investment below cost. The amount of impairment is the difference between the acquisition cost and current fair value of the asset less previously recognized impairment. Impairments of AFS equity investments cannot be reversed. Increases in their fair value after impairment are recognized in equity.

Consistent with the valuation of financial instruments, fair value of equity securities is initially and subsequently determined using quoted prices in active markets or valuation techniques, where prices quoted in active markets are not available.

The Group reports investments in associates and joint ventures under the equity method of accounting. Equity method investments are initially recorded at cost, and subsequently increased (or decreased) to reflect both the Group's pro-rata share of the post-acquisition net income (or loss) and other movements included directly in the equity of the entity. Goodwill arising on the acquisition is included in the carrying value of the investment (net of accumulated impairment loss). At each balance sheet date, the Group assesses whether there is objective evidence that the investment in an associate or jointly controlled entity is impaired. If there is objective evidence of impairment, an impairment test is performed by comparing the investment's recoverable amount, which is the higher of its value in use and fair value less costs to sell, with its carrying amount. Equity method losses in excess of the Group's carrying value of the investment in the entity are charged against other assets held by the Group related to the investee. If those assets are written down to zero, a determination is made whether to report additional losses based on the Group's obligation to fund such losses.

The Group holds equity investments with the intent to realize profits by taking advantage of market opportunities as well as for strategic reasons. Only a smaller part of the investments are intended to support a specific business strategy of a business division as part of a complex customer transaction.

From a management point of view, the following group divisions assume responsibility for equity investments the Group entered into:

- The Corporate Investments Group Division ("CI") manages the global principal investment activities of the Group. The principal investment activities include certain credit exposures, certain private equity and venture capital investments, certain private equity fund investments, certain corporate real estate investments, the industrial holdings of the Group and certain other non-strategic investments. Historically, the mission of CI has been to provide financial, strategic, operational and managerial capital to enhance the values of the portfolio companies in which the group division has invested.
- The group divisions Corporate Banking & Securities and Private Clients & Asset Management mainly hold investments in the bank's alternative asset portfolio for profit realization as well as for strategic reasons.

Our equity exposures in the banking book contain only shares received from loan restructuring which Deutsche Bank use the market price at end of each month from the Stock Exchange of Thailand to mark to market value of the shares. However, Deutsche Bank have no intention to trade these equities.

The table below shows equity exposures in banking book as at 31 December 2019 and 2018.

Equity position of Banking Book

	Unit: TTHB	
Equity exposures	2019	2018
1. Equity exposures		
1.1 Equities listed and publicly traded in the Stock Exchange		
- Book value	3,569.02	3,569.02
- Fair value	-	-
- Impairment	(3,569.02)	(3,569.02)
1.2 Other equities	-	-
2. Gains (losses) of sale of equities in the reporting period	-	-
3. Surplus (deficit) from revaluation of available for sale equities	-	-
Deferred tax	-	-
Net surplus (deficit) from revaluation of available for sale equities	-	-
4. Minimum capital requirements for equity exposures classified by the calculation methods		
- SA	-	-
- IRB	-	-
5. Equity values for commercial banks applying IRB which the Bank of Thailand allows to use SA	-	-

Interest rate risk exposure in banking book

Please refer to topic “Nontrading Market Risk Management” under section “Market risk exposure under the Internal Model Approach (IMA)” for the internal risk management.

In line with Deutsche Bank Group, the banking book in Deutsche Bank AG, Bangkok Branch does not carry interest rate risk. However, in order to comply with the Bank of Thailand’s notification Re: Supervisory Guidelines on Interest Rate Risk in the Banking Book for Financial Institutions, Deutsche Bank AG, Bangkok Branch calculates earnings as a result of upward 100 basis points (bps) changes in interest rate as at 31 December 2019 and 2018 as per the following table. The internal transactions which transfer the interest rate risk to the trading book have been excluded from the calculation.

Interest rate risk in the banking book The effect of changes in interest rates* to net earnings

Unit: TTHB

Currency	Effect to net earnings	
	2019	2018
Baht	69,088.05	57,044.90
USD	(117,631.61)	(45,328.76)
EURO	35,385.42	(10,551.18)
Others	(213.89)	(568.70)
Total effect from changes in interest rate	(13,372.03)	596.26
% of anticipated net interest income for the next one year	-3.61%	0.11%

* Use the percentage changes in interest rates of 100 bps

Composition of capital disclosure requirements as BCBS

Capital during gradually add on/ deduction during Basel III (Transitional period)

As at 31 December 2019 and 2018, Deutsche Bank Bangkok Branch has deducted 100% of net book value of intangible assets from capital during Basel III transitional period.