

Overall Responsibility of the Management (AT 3)

Risk Management (AT 4)

also on a Group Level (AT 4.5)

Risk-bearing Capacity (AT 4.1)

Overall Risk Profile

On the basis of a risk inventory considering concentration of risk and validated diversification effects

- Consideration of material risks
- Reasons required in the case of using exceptions for certain risks

Individual selection of methods for assessment (if necessary estimation)

Reasons for the base assumptions

Risk Taking Potential

- Ongoing coverage of material risk
- Individual definition



Business Strategy (AT 4.2)

Risk Strategy (AT 4.2)

Resources (AT 7)

Personnel (AT 7.1)

- Quantitative and qualitative requirements
- Deputy regulation

Technical Facilities and Related Processes (AT 7.2)

- Ensuring data integrity, availability, authenticity and confidentiality
- Use of established standards
- Implementation of processes for testing and acceptance
- Involvement of staff in enhancements and changes to technical specifications

Contingency Plan (AT 7.3)

- Business continuity and recovery plans
- Regular contingency tests and reporting
- Determination of communication channels

Documentation (AT 6)

Organisational Guidelines (AT 5)

Internal Surveillance Procedures

Internal Control System (AT 4.3, BT 1)

Organisational and Operational Structure (AT 4.3.1)

- General segregation of functions
- Clear definition of all processes
- Harmonising of all processes

Organisational and Operational Structure for the Lending and Trading Business (BTO)

Lending Business (BTO 1)

- Special segregation of functions and voting (BTO 1.1)
- Lending business processes (BTO 1.2)
- Early detection of risks (BTO 1.3)
- Risk classification (BTO 1.4)

Trading Business (BTO 2)

- Special segregation of functions (BTO 2.1)
- Trading business processes (BTO 2.2)

Risk Management and Controlling Processes (AT 4.3.2, BTR)

Identifying, assessing, treating, monitoring and communicating of

- Counterparty risks (BTR 1)
 - Market price risks (BTR 2, BTR 2.1)
 - Market price risks in the trading book (BTR 2.2)
 - Market price risks in the banking book (BTR 2.3)
 - Liquidity risks (BTR 3, BTR 3.1)
 - Additional requirements for capital market oriented institutions (BTR 3.2)
 - Operational risks (BTR 4)
- under consideration of risk concentration and stress test results within an integrated management of return and risk

Stress Tests (AT 4.3.3)

- Different scenarios including severe economic downturn scenarios
- Conception of reverse stress tests
- Critical reflection of results

Internal Audit (AT 4.4, BT 2)

Duties (AT 4.4, BT 2.1)

- Risk-oriented audit approach
- Involvement in key projects (under preservation of independence)
- Audit obligation in the case of outsourcing
- Right of the head of supervisory board to request information directly
- Group audit function (AT 4.5)

General Principles (AT 4.4, BT 2.2)

Planning and Conduct of the Audit (BT 2.3)

Reporting Obligation (BT 2.4)

Reaction to Findings (BT 2.5)

Activities in New Products and on New Markets (AT 8)

Outsourcing (AT 9)