

Deutsche Bank AG Taunusanlage 12 60325 Frankfurt am Main Germany Tel +49 69 9 10-00

Françoise Flores European Financial Reporting Advisory Group 35 Square de Meœs 1000 Brussels Belgium

8 July 2013

RE: EFRAG's endorsement advice on IASB amendments to Novation of Derivatives under IAS 39 and Disclosures of Recoverable Amounts under IAS 36

Dear Ms. Flores:

Deutsche Bank appreciates the opportunity to respond to EFRAG's consultation on the above referenced subjects. The International Accounting Standards Board (IASB) published on June 27, 2013 amendments to IAS 39 Financial Instruments: Recognition and Measurement entitled Novation of Derivatives and Continuation of Hedge Accounting (Novation of Derivatives under IAS 39) as well as the amendments to IAS 36 Impairment of assets entitled Recoverable Amount Disclosures for Non-Financial Assets (Disclosures of Recoverable Amounts under IAS 36).

Deutsche Bank believe that it is important that the two amendments above are endorsed quickly so that they can be applied as soon as possible. Therefore we support EFRAG's efforts to provide a positive endorsement advice on the above named standards.

We hope you find our comments useful and relevant, and look forward to continue working with you in the future. Should you have any questions or would like clarification on any of the matters raised in this letter, please do not hesitate to contact us at karin.dohm@db.com or by telephone at 049 69 910-31183.

Yours sincerely,

Karin Dohm Managing Director Chief Accounting Officer Global Head, Accounting Policy and Advisory Group Deutsche Bank

Maria Mordgren

Maria Nordgren Global Technical Director Accounting Policy and Advisory Group Deutsche Bank

Chairman of the Supervisory Board: Paul Achleitner

Management Board: Jürgen Fitschen (Co-Chairman), Anshuman Jain (Co-Chairman), Stefan Krause, Stephan Leithner, Stuart Lewis, Rainer Neske, Henry Ritchotte

Deutsche Bank Aktiengesellschaft domiciled in Frankfurt am Main; HRB No 30 000, Frankfurt am Main, Local Court; VAT ID No DE114103379; www.db.com