

- Threshold and Minimum Transfer Amount (MTA): A margin rule compliant VM CSA must reflect a threshold of zero, meaning that any mark-to-market exposure must be collected in the form of VM, subject to the applicable MTA. The margin rules cap the MTA at \$500,000 (which also covers initial margin, if any). Deutsche Bank's preference, however, is to apply an MTA of \$250,000.
- Eligible collateral: In general, eligible collateral for a margin rule compliant VM CSA consists of cash and certain securities not correlated to the credit of the collateral provider. If necessary, you should obtain legal advice to determine what assets will constitute eligible collateral for you.

What is required of Wealth Management Client Facing Professionals?

You should alert your clients that they will be receiving information about Uncleared Margin. You may also be asked to confirm or provide contact details for a client if the client's details cannot be obtained from the sources mentioned above.

What if clients fail to comply?

If clients fail to put in place VM rule compliant collateral documentation, DB may not be able to execute new in-scope OTC derivatives trades (or materially amend existing trades) on or after March 1, 2017.