Categories to be excluded:

Level 2 Category	Argument
• Advertising & marketing;	Marketing and advertising services are purely supportive services that serve to promote the brand and facilitate customer contact. From the DBG's perspective, this product category should be removed from the scope of the EBA in accordance with No. 32 f. The reasons for this are that, in the DBG's view, poor performance or failure of such an outsourced service/function has no impact on the operational resilience and/or risk exposure of a financial institution. Specifically, such a service has no connection to the core business activity and thus also no connection to the business continuity of a financial institution, nor does it have any connection to regulations relevant to its authorization or general financial law requirements that must be followed. In terms of proportionality, it would be disproportionate to include such a low-risk product group, especially considering the requirements for a TPA. Ultimately, an exclusion would also be consistent with DORA, as such services are not taken into account in the respective ICT categories here either, but rather the focus is really on services related to the core business and (digital) resilience.
• Insurance services;	In our view, the same risk and proportionality considerations apply to insurance services. This is further complicated by the fact that insurance services are not something that a financial institution can provide itself and is always forced to outsource.
• Postal services & mailing;	For this product category, an exclusion also seems appropriate for similar reasons. It should also be noted here that the critical issues relating to communication in other product groups such as CRM and claims management, etc. are included in the annex as a separate product category. In our view, therefore, there is no further risk to be identified here that would require exclusion within the meaning of No. 32 f, especially since the postal office is also mentioned there.

• **Procurement & purchasing of services;**	Procurement and purchasing of services are the processes a company uses to obtain services from external suppliers. From DBG's perspective, this product category should be removed from the scope of the EBA in accordance with No. 32 f. The reasons for this are that, in the DBG's view, poor performance or failure of such an outsourced service has a low impact on the operational resilience and of a financial institution. Specifically, such a service has no connection to the core business activity and thus also no connection to the business continuity of a financial institution, nor does it have any connection to regulations relevant to its authorization or general financial law requirements that must be followed. In terms of proportionality, it would be disproportionate to include such a low-risk product group, especially considering the requirements for a TPA.
• **Secretarial services**	Secretarial Services are purely supportive services that mainly consist of administrative tasks. From the DBG's perspective, this product category should be removed from the scope of the EBA in accordance with No. 32 f. The reasons for this are that, in the DBG's view, poor performance or failure of such an outsourced service/function has no impact on the operational resilience and /or risk exposure of a financial institution. Specifically, such a service has no connection to the core business activity and thus also no connection to the business continuity of a financial institution, nor does it have any connection to regulations relevant to its authorization or general financial law requirements that must be followed. In terms of proportionality, it would be disproportionate to include such a low-risk product group, especially considering the requirements for a TPA. Ultimately, an exclusion would also be consistent with DORA, as such services are not taken into account in the respective ICT categories here either, but rather the focus is really on services related to the core business and (digital) resilience.

• **Talent acquisition & hiring; Travel & entertainment services;**	Talent acquisition and hiring services are purely supportive administrative functions that facilitate internal staffing processes. From DBG's perspective, this product category should be removed from the scope of the EBA Guidelines in accordance with paragraph 32(f), which excludes "the acquisition of services that do not have material impact on the financial entities' risks exposures or on their operational resilience". Specifically, talent acquisition does not affect the continuity of core financial services, nor does it pose a risk to the institution's compliance with its authorization or financial law obligations. The failure or poor performance of such services would not impair the financial entity's financial performance, operational resilience, or regulatory compliance. Including such low-risk services in the scope would be disproportionate, especially considering the contractual and monitoring requirements for third-party arrangements.
• **Other**	Consultancy services, including strategic, regulatory or operational are typically non-binding and serve as external input to internal decision-making processes. From DBG's perspective, this product category should be excluded from the scope of the EBA Guidelines in accordance with paragraph 32(f), which excludes "the acquisition of services that do not have material impact on the financial entities' risks exposures or on their operational resilience". In our organization, consultants provide recommendations, but the final decisions and implementations are made internally, often diverging from external advice. This means that the service itself does not directly affect the continuity of core business functions, nor does it impair compliance with authorization conditions or financial law obligations. Including such advisory services would be disproportionate, especially considering the monitoring and contractual requirements for third-party arrangements.