

# **CRR ASSESSMENT**

# **ABEST 22**



PRIME COLLATERALISED SECURITIES (PCS) EU SAS

23 October 2023

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This is a CRR Assessment.

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It is important that the reader of this checklist reviews and understands the disclaimer referred to on the following page.

**23 October 2023**

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## PRIME COLLATERALISED SECURITIES (PCS) – CRR Assessment

Individual(s) undertaking the assessment	Daniele Vella
Date of Verification	23 October 2023
<b>The transaction to be verified (the “Transaction”)</b>	<b>A-BEST 22</b>
Issuer	Asset-Backed European Securitisation Transaction Twenty-two S.r.l.
Originator	CA Auto Bank S.p.A.
Arrangers	Crédit Agricole CIB, Milan branch; UniCredit Bank AG
Transaction Legal Counsel	Jones Day
Rating Agencies	Fitch, S&P
Stock Exchange	Luxembourg Stock Exchange
Closing Date	23 October 2023

PCS confirms that all checklist points have been verified as detailed in the associated comment box in the checklist below.

Within the checklist, the relevant legislative text is set out in light blue introductory boxes with specific criteria for our verification listed underneath.

## Legislative Text

Article 243 (1)

2. Positions in a securitisation, other than an ABCP programme or ABCP transaction, that qualify as positions in an STS securitisation, shall be eligible for the treatment set out in Articles 260, 262 and 264 where the following requirements are met:

1a

### **CRR Criteria**

(a) at the time of inclusion in the securitisation, the aggregate exposure value of all exposures to a single obligor in the pool does not exceed 2 % of the exposure values of the aggregate outstanding exposure values of the pool of underlying exposures. For the purposes of this calculation, loans or leases to a group of connected clients shall be considered as exposures to a single obligor.

**Meets Criteria?**  
**YES**

### **PCS Comments**

See the R&W contained in §(l) of Section "THE PORTFOLIO – Other features of the Portfolio":

*<<As at the Transfer Date, the outstanding balance of the Receivables owed by the same Borrower does not exceed 2 per cent. of the aggregate outstanding balance of all Receivables comprised in the Portfolio, for the purposes of article 243(2)(a) of the CRR.>>.*

For more detailed figures on concentration, see also Prospectus Section headed "THE PORTFOLIO - Stratification tables":

- Largest Concentration (Euro): 572,826
- Largest Loan Concentration (%): 0.04%

See also the table headed "Distribution by Top 20 customers".

The requirement is clearly satisfied.

<sup>1</sup> REGULATION (EU) 2017/2401 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 December 2017 amending Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms.

<b>1b</b>	<b><u>CRR Criteria</u></b> In the case of securitised residual leasing values, the first subparagraph of this point shall not apply where those values are not exposed to refinancing or resell risk due to a legally enforceable commitment to repurchase or refinance the exposure at a pre-determined amount by a third party eligible under Article 201(1);	<b><u>Meets Criteria?</u></b> <b>YES</b>
	<b><u>PCS Comments</u></b> <i>Not applicable.</i>	

<b>2</b>	<b><u>CRR Criteria</u></b> (b) at the time of their inclusion in the securitisation, the underlying exposures meet the conditions for being assigned, under the Standardised Approach and taking into account any eligible credit risk mitigation, a risk weight equal to or smaller than: (i) 40 % on an exposure value-weighted average basis for the portfolio where the exposures are loans secured by residential mortgages or fully guaranteed residential loans, as referred to in point (e) of Article 129(1); (ii) 50 % on an individual exposure basis where the exposure is a loan secured by a commercial mortgage; (iii) 75 % on an individual exposure basis where the exposure is a retail exposure <sup>(2)</sup> ; (iv) for any other exposures, 100 % on an individual exposure basis;	<b><u>Meets Criteria?</u></b> <b>YES</b>
	<b><u>PCS Comments</u></b> The Portfolio contains Receivables of two different typologies in a risk weighting perspective. Therefore, both 2 (b)(iii) and 2 (b)(iv) apply, depending on the type of debtor. In particular, CA Bank confirmed to PCS as follows:  <i>&lt;&lt;(…) at the time of their inclusion in the Securitisation: (i) the Receivables owed by natural persons and small and medium enterprises meet the conditions for being assigned, under the Standardised Approach and taking into account any eligible credit risk mitigation, a risk weight equal to or lower than 75%; and (ii) the Receivables owed by enterprises (other than small and medium enterprises) meet the conditions for being assigned, under the Standardised Approach and taking into account any eligible credit risk mitigation, a risk weight equal to or lower than 100%.</i>	

<sup>2</sup> See article 123, "Retail exposures" of the Regulation (EU) No 575/2013; for Consumer loans see the amendments to article 123 in (59) REGULATION (EU) 2019/876 and REGULATION (EU) 2020/873, article 2 (1) (a). See article 501 on "Adjustment of risk-weighted non-defaulted SME exposures for "SME Loans" of the Regulation (EU) No 575/2013, as amended in Regulation (EU) 2019/876 and Regulation 2020/873 in (19) and Article 2.1(b).

In addition, with reference to the Receivables under item (i) above, to the knowledge of CAAB, the total amount owed to it and its parent undertakings and subsidiaries, including any exposure in default, by a single Debtor or a group of connected Debtors, does not exceed Euro 1 million, for the purposes of article 123(c) of the CRR.>>.

In addition, in respect of the exposures towards Borrowers that are individual entrepreneurs, the adjustments set out in Article 501 of CRR shall also apply.

See also Prospectus, *TRANSACTION OVERVIEW* - 4. TRANSFER OF THE PORTFOLIO

Eligibility Criteria

<<(a) it is owed by a Borrower which is, as at the time of entering into the relevant Loan Agreement, (x) a physical person (persona fisica) resident in Italy, and, as at the Transfer Effective Date, is not a CAAB employee; or (y) a legal entity (persona giuridica) having its registered office in Italy;>>.

3	<p><b>CRR Criteria</b></p> <p>(c) where points (b)(i) and (b)(ii) apply, the loans secured by lower ranking security rights on a given asset shall only be included in the securitisation where all loans secured by prior ranking security rights on that asset are also included in the securitisation;</p>	<p><b>Meets Criteria?</b> YES</p>
	<p><b>PCS Comments</b></p> <p>Not applicable.</p>	
4	<p><b>CRR Criteria</b></p> <p>(d) where point (b)(i) of this paragraph applies, no loan in the pool of underlying exposures shall have a loan-to-value ratio higher than 100 %, at the time of inclusion in the securitisation, measured in accordance with point (d)(i) of Article 129(1) and Article 229(1).</p>	<p><b>Meets Criteria?</b> YES</p>
	<p><b>PCS Comments</b></p> <p>Not applicable.</p>	