

CRR ASSESSMENT

Brignole CO 2021 S.r.l.



PRIME COLLATERALISED SECURITIES (PCS) EU SAS

26 July 2021



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26 July 2021



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Prime Collateralised Securities (PCS)
CRR Assessment

Individual(s) undertaking the assessment	Daniele Vella
Date of Assessment /Version	26 July 2021
The transaction to be assessed (the “Transaction”)	Brignole CO 2021
Issuer	Brignole CO 2021 S.r.l.
Originator	Creditis Servizi Finanziari S.p.A.
Lead Manager(s)	Citigroup Global Markets Limited Deutsche Bank AG
Transaction Legal Counsel	Allen & Overy; Jones Day
Rating Agencies	DBRS and Fitch
Stock Exchange	Luxembourg Stock Exchange
Closing Date	26 July 2021

Legislative Text and CRR Criteria	Identifying Document and Checking Page Reference	Checking Comments	Criteria Fulfilled Yes / No	
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:				
1	(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.	See section headed "DESCRIPTION OF THE TRANSACTION DOCUMENTS - 2. WARRANTY AND INDEMNITY AGREEMENT - 2.5 Compliance with certain EU STS Requirements" sub §(i) where it is represented that: <i><<(i) For the purposes of compliance with article 243(2)(a) of the CRR, 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 Aggregate Portfolio. >>.</i>		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	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);	Not applicable.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

¹ 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.

Legislative Text and CRR Criteria	Identifying Document and Checking Page Reference	Checking Comments	Criteria Fulfilled Yes / No
<p>2 (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:</p> <ul style="list-style-type: none"> (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 ⁽²⁾; <p>for any other exposures, 100 % on an individual exposure basis;</p>	<p>2 (b) (iii) should apply.</p> <p>In respect of the nature of the Borrowers as “retail customers”, we note the statements contained in the Prospectus that <<<i>The Aggregate Portfolio comprises only Receivables deriving from Loans qualifying as consumer loans, i.e. loans granted to individuals acting outside the scope of their entrepreneurial, commercial, craft or professional activities.</i>>> (see “CATEGORY OF RISK FACTORS2: RISKS RELATING TO THE AGGREGATE PORTFOLIO - <i>Italian consumer protection legislation contains certain protections in favour of debtors</i>”).</p> <p>See also “Common Criteria” requiring that the Receivables arise from Loans granted to <<<i>(a) are granted to individuals only for consumption purposes.</i>>>.</p> <p>The Originator has also specifically confirmed to PCS that <<<i>the Receivables comprised in the Initial Portfolio arise, and</i></p>		<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p>

² 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).

Legislative Text and CRR Criteria	Identifying Document and Checking Page Reference	Checking Comments	Criteria Fulfilled Yes / No
	<i>the Receivables comprised in each Additional Portfolio will arise, from Loans to which Creditis applies a risk weight of 75% according to the CRR>>.</i>		
3	(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;	Not applicable	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4	(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).	Not applicable	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>