

CRR ASSESSMENT EDML BLUE 2024 B.V.



PRIME COLLATERALISED SECURITIES (PCS) EU SAS

28 October 2024

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28 October 2024

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PRIME COLLATERALISED SECURITIES (PCS) - CRR Assessment

Individual(s) undertaking the assessment	Mark Lewis
Date of Verification	28 October 2024
The transaction to be verified (the "Transaction")	EDML BLUE 2024 B.V.
Issuer	EDML BLUE 2024 B.V.
Originator	Elan Woninghypotheeken B.V. and CRC Obelix Asset Holding DAC
Arranger	ABN AMRO Bank N.V., ING Bank N.V., Goldman Sachs Bank Europe SE and UniCredit Bank GmbH
Transaction Legal Counsel	Allen Overy Shearman Sterling LLP
Rating Agencies	Fitch and Moody's
Stock Exchange	Euronext Dublin
Closing Date	28 October 2024

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 (NOTE 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:

NOTE 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, as amended from time to time.

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 definition "Borrower Concentration means as of (i) the relevant Cut-Off Date or, (ii) in the event of Further Advance Receivables and New Ported Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), the Mortgage Calculation Date immediately preceding the relevant date of completion of the sale and assignment of such Further Advance Receivables or New Ported Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), as applicable, the aggregate outstanding principal balance of the Mortgage Loan(s) granted to a single Borrower does not exceed 2 per cent. of the aggregate outstanding principal balance of all the Mortgage Loans;" See definition CRR Additional STS Conditions means compliance with each of the Standard Approach Risk Weighting and the Borrower Concentration; See 7.1 Purchase, Repurchase and Sale "It shall be a condition precedent to the purchase and assignment of the Mortgage Receivables on the Closing Date that the CRR Additional STS Conditions are satisfied on the Initial Cut-Off Date." See The Elan Further Advance and Additional Loan Part Receivables Purchase Conditions include satisfaction of the following conditions (the Elan Pool Level Conditions) being: (n) the CRR Additional STS Conditions are satisfied on the immediately preceding Mortgage Calculation Date, taking into account all Mortgage Receivables; Blue Additional Purchase Conditions means:... (xiii) the CRR Additional STS Conditions are satisfied on the immediately preceding Mortgage Calculation Date, taking into account all Mortgage Receivables; CRR Additional STS Conditions means compliance with each of the Standard Approach Risk Weighting and the Borrower Concentration;	
1b	CRR Criteria 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);	Meets Criteria? YES

PCS Comments

Not applicable. The transaction does not include residual value risk

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CRR Criteria

(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 (NOTE 2);
- (iv) for any other exposures, 100 % on an individual exposure basis; (NOTE 3)

NOTE 2: For retail exposures, see article 123 on "Retail exposures". It is noted that Article 123 has been amended by Regulation (EU) 2024/1623 of 31 May 2024, and that it contains provisions that are in force as of 9 July 2024 and other provisions that will be in force as of 1 January 2025.

In particular, "Retail Exposures" shall satisfy the following additional requirements:

<<1. Exposures that comply with all of the following criteria shall be considered retail exposures:

(a) the exposure is to one or more natural persons or to an SME;

(b) the total amount owed to the institution, its parent undertakings and its subsidiaries, by the obligor or group of connected clients, including any exposure in default but excluding exposures secured by residential property, up to the property value shall not, to the knowledge of the institution, which shall take reasonable steps to confirm the situation, exceed EUR 1 million;

(c) the exposure represents one of a significant number of exposures with similar characteristics, such that the risks associated with such exposure are substantially reduced;

(d) the institution concerned treats the exposure in its risk management framework and manages the exposure internally as a retail exposure consistently over time and in a manner that is similar to the treatment by the institution of other retail exposures.>> **NB:** this §1(d) shall be in force starting from 1 January 2025.

<<The present value of retail minimum lease payments shall be eligible for the retail exposure class. (...)

(...) 4. Where any of the criteria referred to in paragraph 1 are not met for an exposure to one or more natural persons, the exposure shall be considered a retail exposure and shall be assigned a risk weight of 100 %.>> **NB:** this §(4) shall be in force starting from 1 January 2025.

In addition, specific provisions apply to salary /pension backed exposures and to transactor exposures (as defined in the Regulation (EU) 2024/1623 of 31 May 2024).

NOTE 3: For SME loans see also Article 501 on "Adjustment of risk-weighted non-defaulted SME exposures for "SME Loans" of the Regulation (EU) No 575/2013, as amended and supplemented, including pursuant to Regulation (EU) 2024/1623 of 31 May 2024.

From January 2025, in Article 501(2), points (a) and (b) are replaced by the following:

(a) the exposure to an SME shall be included either in the retail or in the corporates or secured by mortgages on immovable property exposure classes but excluding ADC exposures;

Meets Criteria?

YES

(b) an SME shall have the meaning laid down in Article 5, point (9);
“land acquisition, development and construction exposures”, or “ADC exposures”, means exposures to corporates or special purpose entities financing any land acquisition for development and construction purposes, or financing the development and construction of any residential property or commercial immovable property;
“non-ADC exposure” means any exposure secured by one or more residential properties or commercial immovable properties that is not an ADC exposure;
Article 126a (1) An ADC exposure shall be assigned a risk weight of 150 %.
IPRE provisions that are in force as of 9 July 2024 and other provisions that will be in force as of 1 January 2025 need to be taken in consideration.

PCS Comments

2 (b) (i) applies.

See definition “Standard Approach Risk Weighting”

Standard Approach Risk Weighting means as of (i) the relevant Cut-Off Date or, (ii) in the event of Further Advance Receivables and New Ported Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), the Mortgage Calculation Date immediately preceding the relevant date of completion of the sale and assignment of such Further Advance Receivables or New Ported Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), as applicable, the weighted average of risk weights all Mortgage Loans under the Standardised Approach (as defined in EU CRR) is equal to or smaller than 40 per cent.;

See 7.1 Purchase, Repurchase and Sale “It shall be a condition precedent to the purchase and assignment of the Mortgage Receivables on the Closing Date that the CRR Additional STS Conditions are satisfied on the Initial Cut-Off Date.”

See definition CRR Additional STS Conditions means compliance with each of the Standard Approach Risk Weighting and the Borrower Concentration;

See The Elan Further Advance and Additional Loan Part Receivables Purchase Conditions include satisfaction of the following conditions (the Elan Pool Level Conditions) being:

(n) the CRR Additional STS Conditions are satisfied on the immediately preceding Mortgage Calculation Date, taking into account all Mortgage Receivables;

Blue Additional Purchase Conditions means:... (xiii) the CRR Additional STS Conditions are satisfied on the immediately preceding Mortgage Calculation Date, taking into account all Mortgage Receivables;

3	<u>CRR Criteria</u> (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;	<u>Meets Criteria?</u> YES
	<u>PCS Comments</u> See section 7.3: a. The Elan Mortgage Loan Criteria (v) each Elan Mortgage Receivable is secured by a first ranking mortgage right (hypotheekrecht) or, in case of Elan Mortgage Loans (for the avoidance of doubt including any Elan Further Advances, as the case may be) secured on the same Mortgaged Asset, first and subsequently lower ranking mortgage rights, on a Mortgaged Asset used for residential purposes in the Netherlands and is governed by Dutch law and each Elan Mortgage Loan is originated in the Netherlands; b. The Blue Mortgage Loan Criteria (iv) each Blue Mortgage Receivable is secured by a first ranking mortgage right (hypotheekrecht) or, in the case of Blue Mortgage Receivables secured on the same Mortgaged Asset, first and sequentially lower ranking Mortgages over real estate (onroerende zaak), an apartment right (appartementsrecht), or a long lease (erfpacht) situated in the Netherlands; This item is met.	
4	<u>CRR Criteria</u> (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).	<u>Meets Criteria?</u> YES
	<u>PCS Comments</u> See table “Current loan to indexed market value” in the prospectus See section 7.3 a. The Elan Mortgage Loan Criteria (xlvi) as at the relevant Cut-Off Date or, in the event of Elan Further Advance Receivables and New Elan Ported Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), the Mortgage Calculation Date immediately preceding the relevant date of completion of the sale and assignment of such Elan Further Advance Receivables or New Ported Elan Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), as applicable, the Indexed Current Loan to Value Ratio in respect of each relevant Elan Mortgage Loan is less than one hundred (100) per cent.; and b. The Blue Mortgage Loan Criteria	

(xvi) as at the relevant Cut-Off Date or, in the event of Blue Further Advance Receivables and New Ported Blue Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), the Mortgage Calculation Date immediately preceding the relevant date of completion of the sale and assignment of such Blue Further Advance Receivables or New Ported Blue Mortgage Receivables (including any Additional Loan Part Receivable, if applicable), as applicable, the Indexed Current Loan to Value Ratio in respect of each relevant Blue Mortgage Loan is less than one hundred