

DRAFT 2023-09-19

Provisional CRR ASSESSMENT

MARZIO FINANCE S.r.l.

Series 12-2023



PRIME COLLATERALISED SECURITIES (PCS) EU SAS

[] September 2023

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[] September 2023

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PRIME COLLATERALISED SECURITIES (PCS) – Provisional CRR Assessment

Individual(s) undertaking the assessment	Daniele Vella
Date of Verification	<input type="checkbox"/> September 2023
The transaction to be verified (the “Transaction”)	Marzio Finance - Series 12-2023
Issuer	Marzio Finance S.r.l.
Originator	IBL - Istituto Bancario del Lavoro S.p.A. (“ IBL Banca ”)
Lead Managers	IBL Banca UniCredit Bank AG
Transaction Legal Counsel	[IBL Banca in-house legal team and Jones Day]
Rating Agencies	DBRS, Moody’s and Scope
Stock Exchange	Luxembourg Stock Exchange - Bourse de Luxembourg
Target Closing Date	<input type="checkbox"/> September 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 (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.

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

The Receivables under each Series under the Base Prospectus arise from consumer loans backed by salary/pension payment delegation; or salary/pension assignment. As specified in the Section headed "Italian Consumer Legislation", consumer loans can be granted for amounts ranging from Euro 200 to Euro 75,000. The Portfolio of each Series shall therefore be granular and the concentration is expected to comply with this requirement.

In respect of the Series 12-2023, see in particular the details of the Top Debtor contained in the relevant Final Terms, Table 1 (Portfolio Summary):

- Top Debtor Outstanding Balance of Euro 64,014 equal to a percentage of approximately 0.02% of the principal amount outstanding of the whole Portfolio.

This transaction is not revolving, no further purchases are being made in the context of this transaction and this requirement will therefore be satisfied also in the future.

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 to consumer loans.

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 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). In particular, pursuant to the amendments to Article 123, under Regulation (EU) 2019/876:

<<Exposures due to loans granted by a credit institution to pensioners or employees with a permanent contract against the unconditional transfer of part of the borrower's pension or salary to that credit institution shall be assigned a risk weight of 35 %, provided that all the following conditions are met:

(a) in order to repay the loan, the borrower unconditionally authorises the pension fund or employer to make direct payments to the credit institution by deducting the monthly payments on the loan from the borrower's monthly pension or salary;

(b) the risks of death, inability to work, unemployment or reduction of the net monthly pension or salary of the borrower are properly covered through an insurance policy underwritten by the borrower to the benefit of the credit institution;

(c) the monthly payments to be made by the borrower on all loans that meet the conditions set out in points (a) and (b) do not in aggregate exceed 20 % of the borrower's net monthly pension or salary;

(d) the maximum original maturity of the loan is equal to or less than ten years.>>.

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 in Regulation (EU) 2019/876 and Regulation 2020/873 in (19) and Article 2.1(b).

Meets Criteria?**YES****PCS Comments**

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 that, for the Receivables backed by salary/pension assignment is equal to 35% and for the Receivables backed by salary/pension payment delegation is equal to 75%.

See also a statement in this respect, contained in the Base Prospectus, Section "COMPLIANCE WITH STS REQUIREMENTS", §(g):

<<(…) In addition, for the purposes of article 243(2) letter (b) of 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, the Receivables will meet the conditions for being assigned, under the Standardised Approach (as defined in such regulation) and taking into account any eligible credit risk mitigation, a risk weight equal to or smaller than 75 % on an individual exposure basis, being consumer loans and therefore exposure to retail. In the case of Receivables arising from Salary Assignment (CDQ), however, the risk weight will meet the conditions for being assigned a risk weight equal to or smaller than 35% on an individual exposure basis, in compliance with Article 123, last paragraph, of the said Regulation (EU) No 575/2013, as amended;>>.

2(b)(iii) does apply, provided that the specific provisions set out in the amendments to Article 123 of CRR, pursuant to Regulation (EU) 2019/876, shall also apply.

See Section "THE PORTFOLIOS", where it is stated:

<<*The Receivables which will be comprised in each Portfolio to be transferred under the Programme by the Originator arise out of Loan Agreements granted by the Originator to the relevant Debtors, assisted by either Salary Assignment or Payment Delegation.*>>.

See also the common criteria set out in the Prospectus: "GENERAL DESCRIPTION OF THE PROGRAMME – 4. TRANSFER OF THE PORTFOLIO", where it is required, as for the nature of the Loans that:

<<*Common Criteria*

1) are personal Loans to be reimbursed through a Salary Assignment or, alternatively, assisted by a Payment Delegation issued in favour of IBL Banca by the relevant Debtor and notified to the relevant Employer/Pension Authority and accepted by it;>>.

Therefore, the Portfolios of each series under the Base Prospectus, including Series 12-2023, shall be composed of personal loans backed by:

- salary/pension payment delegation; or
- salary/pension assignment.

As for the Receivable of the Series 12-2023, see the table containing a breakdown by concentration of Salary Assignment vs Payment Delegation, contained in the relevant Final Terms, Table 1 (Portfolio Summary), equal, respectively to 86.27% and 13.73%, approximately.

It is noted that the Payment Delegations do not satisfy the requirements of Article 123 of CRR because they lack "the unconditional transfer" of part of the borrower's pension or salary. Payment Delegations for CRR purposes shall therefore be treated as ordinary consumer loans.

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CRR Criteria

(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;

Meets Criteria?

YES

PCS Comments

Not applicable.

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CRR Criteria

(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).

Meets Criteria?

YES

PCS Comments

Not applicable.