

CRR ASSESSMENT

Marzio Finance S.r.l.

Series 9-2022



PRIME COLLATERALISED SECURITIES (PCS) EU SAS

22 September 2022



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22 September 2022

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**Prime Collateralised Securities (PCS)
CRR Assessment**

Individual(s) undertaking the assessment	Daniele Vella
Date of Assessment /Version	22 September 2022
The transaction to be assessed (the “Transaction”)	Marzio Finance - Series 9-2022
Issuer	Marzio Finance S.r.l.
Originator	IBL - Istituto Bancario del Lavoro S.p.A. (“ IBL Banca ”)
Lead Manager(s)	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
Closing Date	22 September 2022

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 in the Final Terms, Table 1 (<i>Portfolio Summary</i>), the details of the Top Debtor: Top Debtor Outstanding Balance of Euro 79,252 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.		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 to consumer loans.		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.

2	<p>(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) 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.</p> <p>See Section “THE PORTFOLIOS”, where it is stated:</p> <p><i><<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.>>.</i></p> <p>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:</p> <p><i><<Common Criteria</i></p> <p><i>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</i></p>	<p>PCS received confirmation from the Originator that 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%.</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p>
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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 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).

		<p><i>relevant Employer/Pension Authority and accepted by it;>></i></p> <p>Therefore, the Portfolios of each series, including Series 9-2022 is composed of personal loans backed by</p> <ul style="list-style-type: none"> • salary/pension payment delegation or • salary/pension assignment. <p>See also the table containing a breakdown by concentration of Salary Assignment vs Payment Delegation, contained in the Final Terms, Table 1 (<i>Portfolio Summary</i>), equal, respectively to 85.30% and 14.70%, approximately.</p>		
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 to consumer loans.		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 to consumer loans.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>