

# **CRR ASSESSMENT**

## **Mila 2024-1 B.V.**



PRIME COLLATERALISED SECURITIES (PCS) EU SAS

11<sup>th</sup> June 2024

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**11<sup>th</sup> June 2024**

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## PRIME COLLATERALISED SECURITIES (PCS) – CRR Assessment

Individual(s) undertaking the assessment	Mark Lewis
Date of Verification	11 June 2024
<b>The transaction to be verified (the “Transaction”)</b>	<b>Mila 2024-1 B.V.</b>
Issuer	Mila 2024-1 B.V.
Originator/STS Originator	Lender & Spender B.V.
Arranger / Joint Lead Manager(s)	BNP Paribas / BNP Paribas
Transaction Legal Counsel	Nauta Dutilh
Rating Agencies	Fitch and Moody’s
Stock Exchange	Luxembourg Stock Exchange
Closing Date	11 June 2024

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

## 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.

<b>1a</b>	<b>CRR Criteria</b> (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.	<b>Meets Criteria?</b> <b>YES</b>
	<b>PCS Comments</b> 7.2 REPRESENTATIONS AND WARRANTIES (x) the aggregate Outstanding Principal Amount of the Loan Receivables resulting from all Loans entered into with a single Borrower does not exceed 2.0 per cent. of the aggregate Outstanding Principal Amount of all Loan Receivables on the Initial Cut-Off Date or, in case of each New Loan and New Loan Receivable resulting therefrom, on the relevant Weekly Cut-Off Date;	
<b>1b</b>	<b>CRR Criteria</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>Meets Criteria?</b> <b>YES</b>
	<b>PCS Comments</b> Not applicable, the transaction is not exposed to residual values.	
<b>2</b>	<b>CRR Criteria</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);	<b>Meets Criteria?</b> <b>YES</b>

	<p>(ii) 50 % on an individual exposure basis where the exposure is a loan secured by a commercial mortgage;</p> <p>(iii) 75 % on an individual exposure basis where the exposure is a retail exposure (NOTE 2);</p> <p>(iv) for any other exposures, 100 % on an individual exposure basis; (NOTE 3)</p> <p>NOTE 2: See article 123, "Retail exposures" of the Regulation (EU) No 575/2013.</p> <p>NOTE 3: See article 501, "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>	
	<p><b><u>PCS Comments</u></b></p> <p>See 7.3 LOAN CRITERIA</p> <p>(xx) the Loan Receivable meets 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 75 per cent. on an individual exposure basis for a portfolio of such Loan Receivables as set out and within the meaning of article 243(2)(b) of the CRR; and</p>	
3	<p><b><u>CRR Criteria</u></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><u>Meets Criteria?</u></b></p> <p><b>YES</b></p>
	<p><b><u>PCS Comments</u></b></p> <p>Not applicable</p>	
4	<p><b><u>CRR Criteria</u></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><u>Meets Criteria?</u></b></p> <p><b>YES</b></p>
	<p><b><u>PCS Comments</u></b></p> <p>Not applicable.</p>	