CRR ASSESSMENT RED & BLACK AUTO ITALY S.R.L.



PRIME COLLATERALISED SECURITIES (PCS) EU SAS

17th October 2023

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17th October 2023



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PRIME COLLATERALISED SECURITIES (PCS) CRR Assessment

Individual(s) undertaking the assessment	Robert Leach
Date of Verification	17 October 2023
The transaction to be verified (the "Transaction")	RED & BLACK AUTO ITALY S.R.L.
Issuer	RED & BLACK AUTO ITALY S.R.L.
Originator	Fiditalia S.p.A.
Lead Manager(s)	Société Générale
Transaction Legal Counsel	Allen & Overy
Rating Agencies	DBRS, Fitch
Stock Exchange	Luxembourg Stock Exchange
Closing Date	17 October 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.



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Article 2. Posi	itive Text 243 (¹) tions in a securitisation, other than an ABCP programme or ABCP transaction, that qualify as positions in an STS securitisation, shall be eligible in Articles 260, 262 and 264 where the following requirements are met:	e for the treatment
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.	<u>Meets Criteria?</u> YES
	PCS Comments	
	See Prospectus, See Prospectus, <i>THE PORTFOLIO</i> . Other features of the Portfolio	
	Under the Warranty and Indemnity Agreement, the Originator has represented and warranted that:	
	(k) (Borrower's concentration) As at the Transfer Date, the Outstanding Balance of the Receivables owed by the same Borrower does not exceed of the aggregate Outstanding Balance of all Receivables comprised in the Portfolio, for the purposes of article 243(2)(a) of the CRR;	



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.

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);	<u>Meets Criteria?</u> YES
	PCS Comments Not applicable.	
2	 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; 	<u>Meets Criteria?</u> YES
	 (iii) 75 % on an individual exposure basis where the exposure is a retail exposure (²); for any other exposures, 100 % on an individual exposure basis; 	
	PCS Comments Fiditalia has confirmed to PCS that, at the time of their inclusion in the securitisation, the underlying exposures meet the conditions for being assigned, of Standardised Approach and taking into account any eligible credit risk mitigation, a risk weight equal to or smaller than 75% on an individual exposure b accordance with article 243(2)(b) of the CRR.	
3	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;	<u>Meets Criteria?</u> YES
	PCS Comments Not applicable.	

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).



4	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 than100 %, 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> Not applicable.	

