

Interim STS Notification Template files for public securitisations (Version 3; Last update: 21/09/2020)

The templates included in this file have been updated following the publication of the COMMISSION DELEGATED REGULATION (EU) 2020/1226. Updates are highlighted in green. Pending the development of an ESMA IT register for hosting this information, the enclosed templates should be completed as part of the notification requirements to ESMA set out in Article 27 of the Securitisation Regulation (Regulation (EU) No 2017/2402).

Detailed instructions for submitting the interim STS notification template(s) to ESMA:

1. If you are providing an STS notification for a securitisation for a **public** securitisation, then you must follow all of the instructions below. NB: 'Public securitisations' are defined as those securitisations that are not falling under the scope of Article 7(1)(c) of the Securitisation Regulation (where a prospectus has not been drawn up in compliance with Directive 2003/71/EC of the European Parliament and of the Council). **Please note that failure to comply with these instructions may lead to either a rejection of the STS notification submission or delays in making it available on ESMA's website.**

2. Using the worksheets in the public securitisations STS notification template file (ANNEX_I, ANNEX_II, and/or ANNEX_III), select the appropriate template(s) to be completed, as per COMMISSION DELEGATED REGULATION (EU) 2020/1226. Additional columns have been provided for background information.

3. Complete the template(s) in a manner that complies with COMMISSION DELEGATED REGULATION (EU) 2020/1226.

For ease of reference (but without prejudice to the obligations under the technical standards), fields that must always be completed have been highlighted in blue.

For ease of reference (but without prejudice to the obligations under the technical standards), conditional fields (i.e. those that must sometimes be completed depending on the type of instrument) have been highlighted in beige.

4. Once the STS notification template(s) has been completed, save this file, attach it in an email, and send the email to STSnotifications@esma.europa.eu, in adherence with the following modalities:

- Please send only one email per securitisation. Where multiple STS notifications are being submitted (e.g. for two or more securitisations), please send one email per securitisation. For example, where a notification is being made for an ABCP securitisation that requires notification of both the transaction and programme compliance with the STS criteria, then Annex I in the public securitisations STS notification template file should be deleted and Annexes II and III should be completed, and this single saved file should be submitted in one email.
- After sending your first communication to ESMA, your firm must consistently use the same email address to send any further STS notification files to ESMA. Failure to do so may lead to ESMA being unable to recognise your email address and the STS notification file being rejected.
- Where a notification is being made for a non-ABCP securitisation, then Annex I should be completed and Annexes II and III deleted, and this completed file sent in one email.
- Where a notification is being made for an ABCP Programme only, then Annexes I and II should be deleted and Annex III should be completed, and this file saved and sent in an email to ESMA.
- If you are providing an updated STS notification, then you are invited to indicate what has changed since the previous STS notification, in the body of the email.

5. The email subject line must be written in the following manner: [SECU]: LEI - UNIQUE_IDENTIFIER - STATUS where:

- LEI is the legal entity identifier of the report submitting entity and must match fields (STSS2, STSAT2, and/or STSAP2, as applicable),
- UNIQUE_IDENTIFIER is the securitisation identifier assigned by the reporting entity and must conform to the identifier set out in Article 11 of the disclosures technical standards (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2020.289.01.0001.01.ENG&toc=OJ:L:2020:289:TOC), and
- STATUS is either "NEW", "UPDATE", or "CANCELLATION"

For example, a submission of a new STS notification for a public non-ABCP securitisation with a unique identifier of 5493000IBP32UQZ0KL24N201801 from a designated entity with LEI code 00987654321009876543, should have the following subject line in the email:

[SECU]_00987654321009876543_5493000IBP32UQZ0KL24N201801_NEW. An update to that STS notification for that same securitisation should be submitted using an email with the following subject line:
[SEC]_00987654321009876543_5493000IBP32UQZ0KL24N201801_UPDATE.

6. ESMA will then process the files and apply the validation rules set out in Annex 1 of the technical reporting instructions (https://www.esma.europa.eu/sites/default/files/library/esma33-128-585_sts_reporting_instructions.pdf).

7. In case of questions, please refer to Annex 2 in the technical reporting instructions and if this does not answer your question then please send an email to securitisation@esma.europa.eu. PLEASE DO NOT send any question emails to STSnotifications@esma.europa.eu (this address is reserved only for the processing of STS notifications).

FIELD NUMBER	BOX TO COMPLETE FOR STS NOTIFICATION	BACKGROUND INFORMATION: FIELD NAME	BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD	BACKGROUND INFORMATION: FIELD FORMAT	BACKGROUND INFORMATION: ARTICLE OF REGULATION (EU) 2017/2402	BACKGROUND INFORMATION: FIELD DESCRIPTION	BACKGROUND INFORMATION: LINK WITH PROSPECTUS DIRECTIVE / REGULATION
SSTS0	969500WEZL7KEW06Z034; French Financial Markets Authority (Autorité des Marchés Financiers)	First contact point	N/A (General Information)	(LEI)	Article 27 (1)	First contact point Legal Entity Identifier (LEI) of the entity designated as the first contact point and name of the relevant competent authority	Item 3.2 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS1	FR00140003G2	Instrument identification code	N/A (General Information)	(ISIN)	N/A	Where available, the international security identification code (ISIN) or codes, or if no ISIN, then any other unique securities, assigned to this securitisation.	Where available under Item 3.1 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS2	969500WEZL7KEW06Z034	Legal Entity Identifier (LEI)	N/A (General Information)	(LEI)	N/A	The LEI of the originator(s) and sponsor(s), and where available original lender(s).	Item 4.2 of Annex 9 of Commission Delegated Regulation (EU) 2019/980
STSS3	Non applicable.	Notification identifier	N/A (General Information)	(ALPHANUM-100)	N/A	Where reporting an update, the unique reference number assigned by ESMA to the previously notified STS notification.	N/A
STSS4	969500WEZL7KEW06Z034N202001	Unique identifier	N/A (General Information)	(ALPHANUM-100)	N/A	The unique identifier assigned by the reporting entity in accordance with Article 11(1) of Delegated Regulation (EU) 2020/1224	N/A
STSS5	C-025631	Prospectus identifier	N/A (General Information)	(ALPHANUM-100)	N/A	Where available, the prospectus identifier as provided by the relevant competent authority.	N/A
STSS6	European DataWarehouse	Securitisation Repository	N/A (General Information)	(ALPHANUM-1000)	N/A	Where available, the name of the registered securitisation repository.	N/A
STSS7	Silver Arrow France 2020-1	Securitisation name	N/A (General Information)	(ALPHANUM-100)	N/A	The securitisation name.	Section 4 of Annex 9 of Commission Delegated Regulation (EU) 2019/980
STSS8	FR	Country of establishment	N/A (General Information)	(COUNTRYCODE_2)	Article 18 and 27(3)	Where available, the country of establishment of the originator(s), sponsor(s) SSPE(s) and original lender(s).	N/A
STSS9	non-ABCP securitisation	Securitisation classification	N/A (General Information)	(LIST)	N/A	The type of securitisation: -non-ABCP securitisation; -ABCP transaction; -ABCP programme.	N/A
STSS10	auto loans/leases	Underlying exposures classification	N/A (General Information)	(LIST)	N/A	The type of underlying exposures including: 1) residential loans that are either secured by one or more mortgages on residential immovable property or that are fully guaranteed by an eligible protection provider among those referred to in Article 20(1) of Regulation (EU) No 575/2013 and qualifying for the credit quality step 2 or above as set out in Part Three, Title II, Chapter 2 of that Regulation; 2) commercial loans that are secured by one or more mortgages on commercial immovable property, including offices or other commercial premises; 3) credit facilities provided to individuals for personal, family or household consumption purposes; 4) credit facilities, including loans and leases, provided to any type of enterprise or corporation; 5) auto loans/leases; 6) credit card receivables; 7) trade receivables; 8) other underlying exposures that are considered by the originator or sponsor to constitute a distinct asset type on the basis of internal methodologies and parameters;	N/A
STSS11	12/11/2020	Issue date	N/A (General Information)	(DATEFORMAT)	N/A	Where a prospectus has been drawn up in compliance with Regulation (EU) 2017/1129, the originator and sponsor shall provide the date on which the prospectus was approved. In all other cases, the originator and sponsor shall provide the closing date of the most recent transaction.	N/A
STSS12	13/11/2020	Notification date	N/A (General Information)	(DATEFORMAT)	N/A	The date of notification to ESMA.	N/A
STSS13	Prime Collateralised Securities (PCS) EU SAS has verified that the Silver Arrow France 2020-1 securitisation complies with the STS criteria	Authorised Third party	N/A (General Information)	(ALPHANUM-100)	Article 27(2)	Where an authorised third-party has provided STS verification services in accordance with Article 27(2) of Regulation (EU) 2017/2402, a statement that compliance with the STS criteria was confirmed by that authorised third-party firm.	N/A
STSS14	Prime Collateralised Securities (PCS) EU SAS, France	Authorised Third party (name and country of establishment)	N/A (General Information)	(ALPHANUM-1000)	Article 27(2)	Where an authorised third-party has provided STS verification services in accordance with Article 27(2) of Regulation (EU) 2017/2402, the name of the third party's name and the country of establishment.	N/A
STSS15	French Banking Regulation Authority (Autorite de Controle Prudentiel et de Resolution)	Authorised Third party (name of competent authority)	N/A (General Information)	(ALPHANUM-100)	Article 27(2)	Where an authorised third-party has provided STS verification services in accordance with Article 27(2) of Regulation (EU) 2017/2402, the name of the competent authority that has authorised it.	N/A
STSS16	Non applicable.	STS status	N/A (General Information)	(ALPHANUM-1000)	Article 27(5)	A reasoned notification by the originator and sponsor that the securitisation is no longer to be considered as STS.	N/A
STSS17	Y	Originator (or original lender) not a credit institution	N/A (General Information)	(Y/N)	Article 27(3)	A 'Yes' or 'No' statement as to whether the originator or original lender is a credit institution or investment firm established in the Union.	N/A
STSS18	Non applicable.	Originator (or original lender) not a credit institution	N/A (General Information)	(ALPHANUM-1000)	Article 27(3)	Where the answer to field STSS17 is 'No', confirmation that the originator's or original lender's credit-granting criteria, processes and systems in place are executed in accordance with Article 9 of Regulation (EU) 2017/2402.	N/A
STSS19	Non applicable.	Confirmation that the credit granting is subject to supervision	N/A (General Information)	(ALPHANUM-1000)	Article 27(3)	Where the answer to field STSS17 is 'No', confirmation that the credit-granting as referred to in Article 27(3)(a) of Regulation (EU) 2017/2402 is subject to supervision.	N/A
STSS20	Pursuant to the Receivables Purchase Agreement, legal title to the Eligible Receivables and the Ancillary Rights relating thereto is transferred from MBFSF (the Seller) to Silver Arrow France 2020-1 (the FCT) (by way of assignment). Such assignment is valid between the FCT and the Seller and enforceable against third parties, without any further formalities, as at the date affixed on the relevant Transfer Document upon its delivery by the Seller to the Management Company, whatever the date on which the said receivables have come into existence or their maturity or due date, without any further formalities being required, and whatever the law governing the said receivables or the debtors' place of residence in accordance with the provisions of articles L. 214-167 to L.214-175 and L. 214-183 to L. 214-186 and R. 214-217 to R. 214-235 of the French Monetary and Financial Code (the FMFC), as set forth in the legal opinion intended to be issued by Allen & Overy LLP, a reputable law firm with experience in the field of securitisations. As a general note, in this STS notification, except as [otherwise] defined or construed herein or in so far as the context otherwise required, words, expressions and capitalised terms used but not defined or construed herein shall have the meanings defined or construed in the securitisation transaction documents.	Transfer of the underlying exposures by true sale or assignment	Concise Explanation	(ALPHANUM-10000)	Article 20(1)	The STS notification shall provide a concise explanation on how the transfer of the underlying exposures is made by means of true sale or transfer with the same legal effect in a manner that is enforceable against the seller or any third party.	Item 3.3 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS21	For the purpose of compliance with articles 20(2) and 20(3) of the Securitisation Regulation, the Seller confirms that the Bankruptcy Law does not contain severe claw back provisions as referred to in articles 20(2) and 20(3) of the Securitisation Regulation, given that it does not include: (i) provisions which allow the liquidator of the Seller to invalidate the sale of the underlying exposures solely on the basis that it was concluded within a certain period before	No severe clawback	Concise Explanation	(ALPHANUM-10000)	Article 20(2)	The STS notification shall provide a concise explanation on whether any of the severe clawback provisions referred to in Article 20 (2) (a) or (b) of Regulation (EU) 2017/2402 are found in the securitisation, and state whether the provisions in Article 20 (3) of Regulation (EU) 2017/2402 apply.	Item 3.3 of Annex 19 of Commission Delegated Regulation (EU) 2019/981
STSS22	Non applicable.	Exemption for clawback provisions in national insolvency laws	Confirmation	(ALPHANUM-1000)	Article 20(3)	In conjunction with STSS21, where appropriate, the STS notification shall confirm whether there are no circumstances that could give rise to clawback provisions in accordance with Article 20 (1) and (2) of Regulation (EU) 2017/2402.	Item 3.3 of Annex 19 of Commission Delegated Regulation (EU) 2019/982
STSS23	Non applicable.	Transfer where the seller is not the original lender	Confirmation	(ALPHANUM-1000)	Article 20(4)	Where the seller is not the original lender, the STS notification shall provide a statement confirming that the securitisation complies with Article 20(1) to 20(3) of Regulation (EU) 2017/2402.	Item 3.3 of Annex 19 of Commission Delegated Regulation (EU) 2019/983

STSS24	Non applicable.	Transfer performed by means of an assignment and perfected at a later stage	Concise Explanation	(ALPHANUM-10000)	Article 20(5)	Where the transfer of the underlying exposures is performed by means of an assignment and perfected at a later stage than at the closing of the securitisation, the STS notification shall provide a concise explanation on how and whether that perfection is effected at least through the required minimum pre-determined event triggers as listed in Article 20(5) of Regulation (EU) 2017/2402. Where alternative mechanisms of transfer are used, the STS notification shall confirm that an insolvency of the originator would not prejudice or prevent the SPPE from enforcing its rights.	Item 3.3 of Annex 19 of Commission Delegated Regulation (EU) 2019/984
STSS25	For the purpose of compliance with the requirements provided for under article 20(6) of the Securitisation Regulation, the Seller has represented to the FCT, in the Receivables and Purchase Agreement, that each auto loan receivables and auto lease receivables (Receivables) comply with the eligibility criteria. Consequently, the Seller has represented, to the best of its knowledge, that, (i) the underlying auto loan receivables and auto lease receivables (Receivables) are valid and binding and enforceable contractual obligations of the relevant obligor and (ii) it had full title to the Receivables	Representations and warranties	Concise Explanation	(ALPHANUM-10000)	Article 20(6)	The STS notification shall provide a concise explanation on whether there are representations and warranties provided by the seller that the underlying exposures included in the securitisation are not encumbered or otherwise in a condition that can be foreseen to adversely affect the enforceability of the true sale or assignment or transfer with the same legal effect.	Item 2.2.8 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS26	The underlying exposures (Receivables) transferred from the Seller to the FCT shall satisfy the Eligibility Criteria. There will be no active selection by the FCT and, provided that the conditions precedent to the transfer of Receivables are satisfied, the Receivables will be transferred to the FCT upon execution by the Seller of the transfer document. Retransfer of Receivables transferred to the FCT are only allowed in the circumstances listed clauses 10.1, 10.2, 10.3 and 12.1 of the Receivables Purchase Agreement. As a consequence, there is no room for speculative repurchases by the Seller and no adverse impact of repurchase on the portfolio performance should be expected.	Eligibility criteria which do not allow for active portfolio management of the underlying exposures on a discretionary basis	Concise Explanation	(ALPHANUM-10000)	Article 20(7)	The STS notification shall provide concise explanation that: - the underlying exposures transferred from, or assigned by, the seller to the SPPE meet predetermined, clear and documented eligibility criteria which do not allow for active portfolio management of those exposures on a discretionary basis; - the selection and transfer of the underlying exposures in the securitisation is based on clear processes which facilitate the identification of which exposures are selected for or transferred into the securitisation and that they do not allow for their active portfolio management on a discretionary basis.	Section 2 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS27	The satisfaction by the Receivables of the homogeneous conditions of Article 13(a), (b), (c) and (d) of the EBA Final Draft Regulatory Technical Standards on the homogeneity of the underlying exposures in securitisation under Articles 20(14) and 24(21) of the STS (the Draft Homogeneity RTS) Regulation should be based on the following considerations (i) all underlying exposures have been underwritten according to similar underwriting standards which apply similar approaches to the assessment of credit risk associated with the auto loan agreements and auto lease agreements, (ii)	Homogeneity of assets	Detailed Explanation	(ALPHANUM)	Article 20(8)	The STS notification shall provide a detailed explanation as to the homogeneity of the pool of underlying exposures backing the securitisation. For that purpose the originator and sponsor shall refer to the EBA RTS on homogeneity (Commission Delegated Regulation (EU) 2019/1811), and shall explain in detail how each of the conditions specified in the Article 1 of the Commission Delegated Regulation (EU) 2020/1226 are met.	Item 2.2.7 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS28	For the purpose of compliance with article 20(9) of the Securitisation Regulation, a securitisation position as defined in the Securitisation Regulation does not meet the Eligibility Criteria and as a result thereof the underlying exposures transferred to the FCT may not and do not include such securitisation positions. Only underlying exposures arising from	Underlying Exposure Obligations: no re securitisation	Confirmation	(ALPHANUM-1000)	Article 20(9)	The STS notification shall confirm that the underlying exposures do not include any securitisation positions and that the notified securitisation is therefore not a re-securitisation.	Item 2.2 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS29	For the purpose of compliance with the requirements provided for under article 20(10) of the Securitisation Regulation, the Seller, in the Receivables Purchase Agreement, represented that the Loan Agreements and Lease Agreements have been originated in accordance with the ordinary course of its business in compliance with the Credit and Collection Policy and in compliance with applicable French consumer law where the relevant obligor is a consumer.	Soundness of the underwriting standard	Detailed Explanation	(ALPHANUM)	Article 20(10)	The STS notification shall provide a detailed explanation: - as to whether the underlying exposures were originated in the lender's ordinary course of business and whether the applied underwriting standards were no less stringent than those applied at the same time of origination to exposures that were not securitised. - as to whether the underwriting standards and any material changes from prior underwriting standards have been or will be fully disclosed to potential investors without undue delay. - on how securitisations where the underlying exposures are residential loans, the pool of underlying exposures meet the requirement of the second paragraph of Article 20(10) of Regulation (EU) 2017/2402	Item 2.2.1 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS30	As part of Daimler AG, the Seller, which activities started in 1988, does have significantly more than 5 years of experience in origination and underwriting of exposures similar to those securitised.	Originator/Lender Expertise	Detailed Explanation	(ALPHANUM)	Article 20(10)	The STS notification shall provide a detailed explanation as to whether the originator or original lender have expertise in originating exposures of a similar nature to those securitised.	Item 2.2.7 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS31	For the purpose of compliance with the relevant requirements provided for under article 20(11) of the Securitisation Regulation, the Seller has represented to the FCT in the Receivables Purchase Agreement that each receivable to be transferred to the FCT meet, inter alia, the Eligibility Criteria on the purchase date pursuant to which, in particular (i) no receivable to be transferred to the FCT can be in arrears or defaulted and (ii) the relevant obligor under the relevant Loan Agreement or Lease Agreement is not a credit-impaired borrower.	Transferred underlying exposures without exposures in default	Detailed Explanation	(ALPHANUM)	Article 20(11)	The STS notification shall provide a detailed manner as to whether: - the transferred underlying exposures do not include, at the time of selection, defaulted exposures (or restructured exposures) as defined in Article 20(11) of the Regulation (EU) 2017/2402 as applicable; - the securitisation contains any credit-impairedness at the time of securitisation as specified in Article 20(11) (a) to (c) of Regulation EU 2017/2402; - the requirements referred to in Article 20 (11) (b) of Regulation (EU) 2017/2402 are met ; - the requirements referred to in Article 20 (11) (c) of Regulation (EU) 2017/2402 are met.	Item 2.2.8 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS32	According to the Eligibility Criteria, on the Cut-Off Date, each Receivable shall have given rise to the payment of at least one (1) instalment. The exemption of Article 20(12) does not apply.	At least one payment at the time of transfer	Confirmation	(ALPHANUM-1000)	Article 20(12)	The STS notification shall confirm whether, at the time of transfer of the exposures, the debtors have made at least one payment. The STS notification shall also confirm whether or not the exemption under Article 20(12) applies.	Item 3.3 and 3.4.6 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS33	The transaction has been structured not to be predominantly dependent on the sale of the cars or other assets securing the Loan Receivables. The repayment is entirely linked to the repayment of the Loan Agreements; the repayment of the Loan Agreements in turn is not contingent and does not depend on the sale of the vehicles which serve as collateral for	Repayment of the holders shall not have been structured to depend predominantly on the sale of assets.	Detailed Explanation	(ALPHANUM)	Article 20(13)	The STS notification shall provide a detailed explanation of the degree of dependence of the repayments of the holders of the securitisation position on the sale of assets securing the underlying exposures.	Item 3.4.1 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS34	The risk retention is made in accordance with option (4) of the list set out in the right column. The originator will comply with the risk retention requirement provided for in Article 6 of the Securitisation Regulation in accordance with Article 6(3)(d) of the Securitisation Regulation. Indeed, the originator, as Class B Noteholder and Seller, has undertaken, in accordance with Article 6(3)(d) of the Securitisation Regulation, to subscribe to all Class B Notes to be issued and to retain their ownership at all times, being no less than 5% of the aggregate amount of Notes outstanding. The Monthly Reports will also set out monthly confirmation regarding the continued holding of the Class B Notes by the originator.	Compliance with risk retention requirements	Concise Explanation	(LIST)	Article 21(1)	The STS notification shall provide a concise explanation as to how the originator, sponsor or original lender of a non-ABCP securitisation comply with the risk retention requirement as provided for in Article 6 of Regulation (EU) 2017/2402. These explanations shall in particular indicate which entity retains the material net economic interest and which option is used for retaining the risk including: (1) vertical slice in accordance with Article 6(3)(a) of Regulation (EU) 2017/2402; (2) seller's share in accordance with Article 6(3)(b) of Regulation (EU) 2017/2402; (3) randomly-selected exposures kept on balance sheet, in accordance with Article 6(3)(c) of Regulation (EU) 2017/2402; (4) first loss tranche in accordance with Article 6(3)(d) of Regulation (EU) 2017/2402; (5) first loss exposure in each asset in accordance with Article 6(3)(e) of Regulation (EU) 2017/2402; (6) no compliance with risk retention requirements set out in Article 6 (3) of Regulation (EU) 2017/2402 ; (7) other options are used.	Item 3.1 of Annex 9 and Item 3.4.3 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS35	Both assets and liabilities of the Issuer are EUR denominated hence no currency risk occurs. Since the Purchased Receivables are fixed rate and the Class A Notes are floating rate, interest rate risks arise from such mismatch. Interest rate risks in relation to the Class A Notes will be hedged with a fixed-floating interest rate swap.	Mitigation of interest rates (R) and currency risks (FX) Risks	Concise Explanation	(ALPHANUM-10000)	Article 21(2)	The STS notification shall provide a concise explanation as to whether the interest rates and currency risks are appropriately mitigated and that measures are taken to mitigate such risks and confirm that such measures are available to investors.	Item 3.4.2 and Item 3.8 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS36	The pool of underlying exposures does not include derivatives. With regards to the interest-rate arising from the securitisation such interest-rate is hedged with a fixed-floating interest rate swap. Except for the purpose of hedging the interest-rate risk, the Issuer has not entered into derivative contracts. For the purpose of compliance with article	Derivatives Purchased/Sold by SPPE	Concise Explanation	(ALPHANUM-10000)	Article 2017/2402.	The STS notification shall explain in a concise manner that the SPPE has not entered into derivative contracts except in the circumstances referred to in Articles 21(2) of Regulation (EU) 2017/2402.	Item 3.4.2 and Item 3.8 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS37	The fixed-floating interest rate swap will be documented, according to common standards in international finance, by the ISDA Master Agreement, a rating compliant schedule, a related Credit Support Annex and a confirmation.	Derivatives using common standards	Concise Explanation	(ALPHANUM-10000)		The STS notification shall provide a concise explanation on whether any hedging instruments used are underwritten and documented according to commonly accepted standards.	Item 3.4.2 and Item 3.8 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS38	No reference rates apply to the Purchased Receivables which bear fixed interest rates. The Class A Notes will bear interest at floating rate based on 1-M-Euribor and the Class B Notes will bear fixed interest rate. The cash deposited on the Issuer Account will be subject to EONIA - 15 bps (or EStr equivalent). The subordinated loan will bear fixed interest rate. The floating rate option of the interest rate swap agreement will be 1-M-Euribor.	Referenced interest payments based on generally used interest rates	Concise Explanation	(ALPHANUM-10000)	Article 21(3)	The STS notification shall explain in a concise manner whether and how any referenced interest payments under the securitisation assets and liabilities are calculated by reference to generally used market interest rates or generally used sector rates reflective of the cost of funds.	Item 2.2.2 and Item 2.2.13 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS39	Upon the occurrence of an event of default or an acceleration event, the issuer will deliver an acceleration notice. The acceleration can only be distributed in accordance with the post-enforcement priority of payment. No amount of cash shall be trapped in the Issuer beyond what is necessary to ensure the operational functioning of the Issuer or the orderly repayment of	No trapping of cash following enforcement or an acceleration notice	Concise Explanation	(ALPHANUM-10000)	Article 21(4)	The STS notification shall explain concisely and in general terms that each of the requirements of Article 21(4) of Regulation (EU) 2017/2402 are met.	Item 3.4.5 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS40	All the available cash shall be used on a monthly basis until the Issuer Liquidation Date, to pay the creditors of the FCT in accordance with, and subject to, the priority of payments applicable after the service of an Enforcement Notice.	(a) No amount of cash shall be trapped	Confirmation	(ALPHANUM-1000)	Article 21(4) (a)	The STS notification shall confirm that no cash would be trapped following the delivery of an enforcement or an acceleration notice.	Item 3.4.5 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS41	The principal receipts from the underlying exposures shall form part of the cash used to redeem the Class A Notes.	(b) principal receipts shall be passed to investors	Confirmation	(ALPHANUM-1000)	Article 21(4) (b)	The STS notification shall confirm that principal receipts from the underlying exposures are passed to the investors via sequential amortisation of the securitisation positions, as determined by the seniority of the securitisation position.	Item 3.4.5 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS42	The Class A Notes must be redeemed in priority before the Class B Notes in any case: payments of principal of the Class B Notes (and of the Residual Units) are always subordinated to the payments of principal of the Class A Notes.	(c) repayment shall not be reversed with regard to their seniority	Confirmation	(ALPHANUM-1000)	Article 21(4) (c)	The STS notification shall confirm that the repayment of the securitisation position is not to be reversed with regard to their seniority.	Item 3.4.5 of Annex 19 of Commission Delegated Regulation (EU) 2019/980
STSS43	There is no provision requiring automatic liquidation of the underlying exposures at market value, unless the Management Company has declared the liquidation of the FCT: in such a case, the Management Company, on behalf of	(d) no provisions shall require automatic liquidation of the underlying exposures at market value	Confirmation	(ALPHANUM-1000)	Article 21(4) (d)	The STS notification shall confirm that not any provisions require automatic liquidation of the underlying exposures at market value.	Item 3.4.5 of Annex 19 of Commission Delegated Regulation (EU) 2019/980

ISO 3166 Alpha-2 code	English name
AF	Afghanistan
AX	Åland Islands
AL	Albania
DZ	Algeria
AS	American Samoa
AD	Andorra
AO	Angola
AI	Anguilla
AQ	Antarctica
AG	Antigua and Barbuda
AR	Argentina
AM	Armenia
AW	Aruba
AU	Australia
AT	Austria
AZ	Azerbaijan
BS	Bahamas
BH	Bahrain
BD	Bangladesh
BB	Barbados
BY	Belarus
BE	Belgium
BZ	Belize
BJ	Benin
BM	Bermuda
BT	Bhutan
BO	Bolivia (Plurinational State of)
BQ	Bonaire, Sint Eustatius and Saba
BA	Bosnia and Herzegovina
BW	Botswana
BV	Bouvet Island
BR	Brazil
IO	British Indian Ocean Territory
BN	Brunei Darussalam
BG	Bulgaria
BF	Burkina Faso
BI	Burundi
CV	Cabo Verde
KH	Cambodia
CM	Cameroon
CA	Canada
KY	Cayman Islands
CF	Central African Republic
TD	Chad
CL	Chile
CN	China
CX	Christmas Island
CC	Cocos (Keeling) Islands

CO	Colombia
KM	Comoros
CG	Congo
CD	Congo (Democratic Republic of the)
CK	Cook Islands
CR	Costa Rica
CI	Côte d'Ivoire
HR	Croatia
CU	Cuba
CW	Curaçao
CY	Cyprus
CZ	Czechia
DK	Denmark
DJ	Djibouti
DM	Dominica
DO	Dominican Republic
EC	Ecuador
EG	Egypt
SV	El Salvador
GQ	Equatorial Guinea
ER	Eritrea
EE	Estonia
SZ	Eswatini
ET	Ethiopia
FK	Falkland Islands (Malvinas)
FO	Faroe Islands
FJ	Fiji
FI	Finland
FR	France
GF	French Guiana
PF	French Polynesia
TF	French Southern Territories
GA	Gabon
GM	Gambia
GE	Georgia
DE	Germany
GH	Ghana
GI	Gibraltar
GR	Greece
GL	Greenland
GD	Grenada
GP	Guadeloupe
GU	Guam
GT	Guatemala
GG	Guernsey
GN	Guinea
GW	Guinea-Bissau
GY	Guyana
HT	Haiti
HM	Heard Island and McDonald Islands

VA	Holy See
HN	Honduras
HK	Hong Kong
HU	Hungary
IS	Iceland
IN	India
ID	Indonesia
IR	Iran (Islamic Republic of)
IQ	Iraq
IE	Ireland
IM	Isle of Man
IL	Israel
IT	Italy
JM	Jamaica
JP	Japan
JE	Jersey
JO	Jordan
KZ	Kazakhstan
KE	Kenya
KI	Kiribati
KP	Korea (Democratic People's Republic of)
KR	Korea (Republic of)
KW	Kuwait
KG	Kyrgyzstan
LA	Lao People's Democratic Republic
LV	Latvia
LB	Lebanon
LS	Lesotho
LR	Liberia
LY	Libya
LI	Liechtenstein
LT	Lithuania
LU	Luxembourg
MO	Macao
MK	Macedonia (the former Yugoslav Republic of)
MG	Madagascar
MW	Malawi
MY	Malaysia
MV	Maldives
ML	Mali
MT	Malta
MH	Marshall Islands
MQ	Martinique
MR	Mauritania
MU	Mauritius
YT	Mayotte
MX	Mexico
FM	Micronesia (Federated States of)
MD	Moldova (Republic of)
MC	Monaco

MN	Mongolia
ME	Montenegro
MS	Montserrat
MA	Morocco
MZ	Mozambique
MM	Myanmar
NA	Namibia
NR	Nauru
NP	Nepal
NL	Netherlands
NC	New Caledonia
NZ	New Zealand
NI	Nicaragua
NE	Niger
NG	Nigeria
NU	Niue
NF	Norfolk Island
MP	Northern Mariana Islands
NO	Norway
OM	Oman
PK	Pakistan
PW	Palau
PS	Palestine, State of
PA	Panama
PG	Papua New Guinea
PY	Paraguay
PE	Peru
PH	Philippines
PN	Pitcairn
PL	Poland
PT	Portugal
PR	Puerto Rico
QA	Qatar
RE	Réunion
RO	Romania
RU	Russian Federation
RW	Rwanda
BL	Saint Barthélemy
SH	Saint Helena, Ascension and Tristan da Cunha
KN	Saint Kitts and Nevis
LC	Saint Lucia
MF	Saint Martin (French part)
PM	Saint Pierre and Miquelon
VC	Saint Vincent and the Grenadines
WS	Samoa
SM	San Marino
ST	Sao Tome and Principe
SA	Saudi Arabia
SN	Senegal
RS	Serbia

SC	Seychelles
SL	Sierra Leone
SG	Singapore
SX	Sint Maarten (Dutch part)
SK	Slovakia
SI	Slovenia
SB	Solomon Islands
SO	Somalia
ZA	South Africa
GS	South Georgia and the South Sandwich Islands
SS	South Sudan
ES	Spain
LK	Sri Lanka
SD	Sudan
SR	Suriname
SJ	Svalbard and Jan Mayen
SE	Sweden
CH	Switzerland
SY	Syrian Arab Republic
TW	Taiwan, Province of China[a]
TJ	Tajikistan
TZ	Tanzania, United Republic of
TH	Thailand
TL	Timor-Leste
TG	Togo
TK	Tokelau
TO	Tonga
TT	Trinidad and Tobago
TN	Tunisia
TR	Turkey
TM	Turkmenistan
TC	Turks and Caicos Islands
TV	Tuvalu
UG	Uganda
UA	Ukraine
AE	United Arab Emirates
GB	United Kingdom of Great Britain and Northern Ireland
US	United States of America
UM	United States Minor Outlying Islands
UY	Uruguay
UZ	Uzbekistan
VU	Vanuatu
VE	Venezuela (Bolivarian Republic of)
VN	Viet Nam
VG	Virgin Islands (British)
VI	Virgin Islands (U.S.)
WF	Wallis and Futuna
EH	Western Sahara
YE	Yemen
ZM	Zambia

ZW

Zimbabwe