

## Consultation Paper

CP26/6\*\*\*

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Rules for reforming the UK Securitisation  
Framework

17 February 2026

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Or in writing to:

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# Chapter 1

## Summary

### Why we are consulting

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- 1.1** Securitisation markets play an important role in facilitating lending to UK businesses and households. Securitisation allows financial institutions to manage their funding, which helps them to serve the financing needs of their customers, and to create investments that are attractive to a broad range of investors. In doing so, effective and robust securitisation markets help to promote sustainable UK economic growth.
- 1.2** We want to support the issuance of, and investment in, securitisations by ensuring that their regulation is clear, proportionate and results in high standards, thereby giving investors and issuers confidence to use these markets. In doing so it is important to learn lessons from the past. Securitisation markets played a role in the Global Financial Crisis (GFC), which then led to a new regulatory framework being implemented. Our proposals for reform seek to maintain the core objectives of the post-GFC regulatory framework, introducing more principles-based requirements and making measured adjustments that reflect lessons learned from the operation of the existing rules. This will ensure that the framework is effective, responsive and fit for purpose.
- 1.3** This consultation paper (CP) builds upon [CP 23/17](#) and subsequent policy statement (PS) [PS 24/4](#), which transferred firm-facing securitisation rules to the FCA Handbook. Via this earlier consultation and extensive industry engagement we have identified a number of proposed changes to UK securitisation rules, which are set out in this CP.
- 1.4** Industry feedback has for some time pointed to aspects of the securitisation framework that are highly prescriptive and create material burden for institutional investors and firms involved with issuing securitisations without necessarily achieving material benefits. In line with this feedback, the FCA considers that it is possible to streamline securitisation rules and give firms more flexibility in the way they implement the rules, while preserving high standards in these markets.
- 1.5** Accordingly, this CP proposes a material simplification of our rules. In particular, we want to enable firms to issue securitisations and provide essential information about them without unnecessary burdens. We also want UK investors to understand and assess the risks of investing in securitisations without being overly prescriptive about how they should do that. Moreover, we want UK investors to have access to a broad range of investments to enable them to compete with their global counterparts and deliver competitive risk-adjusted returns.
- 1.6** To achieve this, we are consulting on proposals to:
- **Simplify due diligence requirements.** Appropriate and adequate due diligence is critical to ensure investors understand the risk they are taking when investing in a securitisation, but we want to allow institutional investors more flexibility

in how they conduct this due diligence. Imposing prescriptive due diligence rules on sophisticated institutional investors is a unique requirement because such investors are typically deemed to be able to make informed decisions and because the risks stemming from information asymmetry are considered lower. These entities are already subject to internal governance, risk frameworks and regulatory oversight. Therefore, additional due diligence obligations can be seen as disproportionate and duplicative, adding burden without a corresponding risk-mitigation benefit. We are proposing to replace requirements on institutional investors to verify compliance with UK rules or similar standards with an obligation to assess the risks involved in the securitisation to confirm it meets the investor's risk appetite and that it maintains sufficient alignment of interest between manufacturer and investor. A more proportionate approach to due diligence will also enable institutional investors to access a more diverse range of assets, improving their ability to balance risk and return effectively. This shift away from the existing rules that restrict the type of securitisations that an investor can invest in — which are atypical internationally — will strengthen the competitiveness of FCA-regulated institutional investors by permitting access to securitisations from other jurisdictions, as long as a mechanism is present to align the interest of the investor and that of the manufacturer.

- **Streamline transparency requirements whilst maintaining the obligation to provide comprehensive reporting of information for the protection of investors.** This includes reducing the number of specified templates, simplifying retained templates and their format, introducing a new template for collateralised loan obligations (CLOs), removing the delineation between public and private securitisations, and no longer requiring reporting to Securitisation Repositories (SRs). We consider that the changes to the transparency rules have the potential to better align disclosures with evolving market practices. At the same time, our proposals recognise that a degree of comparability and standardisation is appropriate for more mature asset classes where we are proposing to retain certain templates. The streamlining of transparency obligations should materially lower the cost of compliance, making it easier for smaller entities to originate securitisations and potentially attract more manufacturers to the securitisation market (we use the term 'manufacturers' as shorthand for originators, original lenders, sponsors and/or (as appropriate) securitisation special purpose entities (SSPEs), each as defined in the Securitisation Regulations 2024 (UK SR 2024) (SI 2024/102)). More flexible transparency should deliver a more proportionate regime, while maintaining robust market transparency for investors and regulators, and minimise frictions for UK manufacturers who want to attract overseas investors.
- **Introduce a number of other changes** to allow an additional modality for risk retention, to introduce certain exceptions to the ban on resecuritisation and to provide further clarity on the application of the credit granting criteria.

- 1.7** This CP also includes a discussion chapter on the scope of the application of the securitisation conduct rules as well as the proposed legal instrument.

- 1.8** We have worked closely with the Prudential Regulation Authority (PRA) who is publishing a parallel consultation paper with proposals that would affect the firms authorised by the PRA. When making conduct rules in relation to the securitisation market, the FCA and the PRA are required by the UK legislation, i.e., the UK SR 2024, to 'have regard' to the coherence of the overall UK securitisation framework. We have coordinated our approaches to create a streamlined and coherent framework for the regulation of UK securitisations.
- 1.9** While the PRA and the FCA have different corporate styles and rule drafting approaches, we have sought to ensure coherence between our respective draft instruments for consultation. Differences in drafting style are not reflective of a divergence in policy intentions between the two authorities.
- 1.10** While most of the rules we and the PRA are proposing to amend are in our Handbook and the PRA Rulebook respectively, some provisions of the securitisation framework are contained in legislation.
- 1.11** Following discussions with HM Treasury (the Treasury), we understand they intend to lay before Parliament a Statutory Instrument (SI) which will amend relevant parts of the UK SR 2024 to enable us, subject to consultation, to make the rules proposed in this paper.
- 1.12** This CP reflects our ongoing commitment to enhancing the UK's position in global wholesale markets. We aim to ensure that the UK remains a jurisdiction of choice, recognised by the quality, resilience, and competitiveness of its securitisation framework.

## Who this applies to

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- 1.13** This consultation will affect:
- Authorised firms that are involved in securitisation markets either as institutional investors or as manufacturers.
  - Unauthorised entities acting as an original lender, originator or SSPE of a securitisation subject to the FCA rules in SECN.
  - Individuals holding offices or positions involving responsibility for taking management decisions at firms involved in securitisation markets.
  - UK Securitisation Repositories (SRs).

## Outcome we are seeking

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- 1.14** Our approach in reforming the securitisation rules aims to 1) maintain high transparency standards to preserve market integrity, 2) support innovation and new entrants and 3) simplify and streamline our rules and regulatory approach to eliminate unnecessary costs.

**1.15** We have done so by:

- Making the securitisation rules more proportionate.
- Reducing barriers to issuing and investing in securitisations.
- Maintaining appropriate protections for investors.
- Providing a clearer framework for market participants.

**1.16** Our proposals aim to ensure the market can operate with greater confidence and efficiency, reducing legal and operational uncertainty and fostering a favourable environment for the securitisation market. Higher volumes of issuances within a robust framework should deepen liquidity and foster a resilient financial system that supports lending to the real economy.

## Measuring success

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**1.17** Securitisation is an important source of funding for UK businesses, aiding capital raising, liquidity and risk management for manufacturers. Sound securitisation structures are a channel for diversifying funding sources and allow for a broader distribution of risk to investors. Securitisation can also help free up originators' balance sheets to allow for further lending to the economy. A well-functioning market that balances the needs of originators and investors will be a key measure of success.

**1.18** Regulation is not the sole driver in origination or investment choices, and we recognise that macroeconomic and other factors have a significant impact on securitisation market trends. We will assess the impact of our proposals:

- In the short term, success will be reflected in firms' ability to comply with simplified rules.
- In the longer term, by monitoring the size and breadth of the UK securitisation market and UK institutional investor activity. Indicators include increased issuance volumes across asset classes, greater diversity of originators and sponsors, and broader investor participation.

**1.19** More specifically, in relation to the transparency rules, we will seek to measure impact by monitoring key metrics in the securitisation market and by canvassing views from stakeholders, including institutional investors, to gauge how the quality of reporting has evolved.

**1.20** We will assess the success of changes to the due diligence framework by monitoring how due diligence is performed by FCA regulated institutional investors and whether the changes have been effective in achieving more flexibility without leading to lower standards.

- 1.21** Finally, we will continue to monitor market developments to understand how the exemptions from the ban on resecuritisations have impacted the availability of new products in the market.
- 1.22** Other measures of success include improved perceptions of our regulatory effectiveness and metrics outlined in our FCA outcomes and metrics 2025 to 2030.

## Next steps

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- 1.23** This consultation closes on Monday 18 May 2026. We invite feedback on the proposals set out in this consultation and the draft Handbook text.
- 1.24** Please respond by completing the [response form](#) on our website or by sending a response to [cp26-6@fca.org.uk](mailto:cp26-6@fca.org.uk).
- 1.25** We welcome engagement with market participants during the consultation period. Please contact the above inbox if you wish to discuss the consultation.
- 1.26** We will consider your feedback and expect to make final rules in H2 2026.

## Chapter 2

# The Wider Context

### Continuing the Securitisation Reforms

- 2.1** The Securitisation Regulations 2018 (UK SR 2018) (SI 2018/1288) were implemented in 2019 to promote the development of a well-functioning securitisation market, balancing the needs of originators and protections for investors. They sought to make the securitisation markets work more effectively and to address some of the harms to investors identified in these markets following the GFC, including the lack of adequate disclosures and the misalignment between manufacturers and investors' interests.
- 2.2** However, the UK SR 2018 ended up being too complex and burdensome, which may have contributed to stifling the UK securitisation market. Over the last few years, we have engaged with industry extensively to understand how regulation can support the growth of the securitisation market while preserving the safeguards that were put in place to avoid a repeat of the GFC.
- 2.3** In 2024, most firm-facing provisions of the UK SR 2018 were transferred to the FCA and PRA rulebooks following the repeal and replacement of assimilated law (i.e., retained European Union (EU) law). The remaining provisions, such as the scope and key definitions remained in legislation.
- 2.4** Together with the PRA, we took the opportunity of this transfer to make targeted policy changes to our securitisation rules, including in relation to the information required for investors' due diligence, to clarify aspects of risk retention and the scope of application and some other additional technical changes.
- 2.5** We believe that more should be done to support the UK securitisation market. Although the policy objectives underpinning the rules are widely accepted, in practice the current requirements have led to excessive complexity and high compliance costs without always achieving their intended purpose. In addition, removing unnecessary barriers to securitisation issuance could make UK lenders more competitive, particularly in relation to other international markets which have less burdensome rules and a faster-growing market.

### Interaction with other regimes

- 2.6** Despite the changes made to the UK regime in 2024, the UK and the EU securitisation frameworks are currently broadly aligned.
- 2.7** The EU is currently going through its legislative process to reform its own securitisation framework. The objectives of the EU reforms are similar to those of the UK and aim to support the growth of the securitisation market while preserving the safeguards put in place post GFC.

- 2.8** The focus of the EU proposals is also similarly around the simplification of the reporting regime and of the due diligence requirements. However, whilst the EU legislative process has not reached its conclusion yet, it is likely that the UK and EU regimes will differ. Given the important linkages between UK and EU securitisation markets, in formulating our proposals we have sought to minimise the frictions from operating on a cross-border basis where possible, for example by proposing flexibility in transparency requirements where a UK firm's compliance with EU rules would be deemed sufficient to satisfy UK requirements.
- 2.9** As to the EU non-legislative materials, our position remains the same as set out in PS 24/4, i.e., that market participants should continue to refer to the guidance (Brexit: our approach to EU non-legislative materials) and take a pragmatic approach to the same where the regulators have amended the policy.

### **The PRA consultation and amendments to Legislation**

- 2.10** This consultation must be read in conjunction with the concomitant PRA consultation paper setting out their proposals for PRA authorised persons.
- 2.11** We are discussing with the Treasury to assess whether an amendment to the UK SR 2024 is desirable, for example to make the due diligence requirements on the occupational pensions schemes similar to those that will be agreed for FCA and PRA institutional investors as a result of this consultation.
- 2.12** This, in turn, is then relevant for how UK institutional investors who may be FCA (or PRA) regulated firms should consider their obligations as agents (i.e., as delegated asset managers) under SECN 4.5.

## Chapter 3

### Due Diligence

- 3.1** Due diligence is the process through which an investor or a potential investor conducts an assessment of a securitisation, prior to investing in it and on an ongoing basis while holding the securitisation.
- 3.2** During the GFC, it became clear in a number of instances that investors were not sufficiently informed as to the risks they were exposed to when holding a securitisation position. Since then, regulatory efforts sought to address this by placing requirements on institutional investors (mainly FCA and PRA regulated entities) to conduct adequate due diligence prior to investing in the securitisation market.
- 3.3** As part of the repeal and replacement of assimilated law (as set out in PS 24/4), our rules in the SECN sourcebook published in April 2024 amended the existing due diligence requirements with a view to simplifying our approach and to ensuring a more proportionate framework for investments in overseas securitisations. However, we believe that there is scope to further simplify the requirements while maintaining the original policy intent.

### Overview of current regulatory requirements relating to due diligence

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- 3.4** Institutional investors must perform appropriate due diligence checks before investing in a securitisation position and on an ongoing basis. Key aspects include:
- verification of manufacturers' compliance with certain standards and applicable provisions, including in relation to disclosed information, credit granting criteria and risk retention;
  - prior to investing, assessment of the risks involved such as credit, structural and legal; and
  - assessment of performance of the securitisation and ability to demonstrate compliance on an ongoing basis.
- 3.5** We have engaged with market participants, including through CP23/17, with a view to revisit our rules on due diligence. Feedback overall indicates that the current requirements are perceived as disproportionately onerous. Comments focused primarily on the following areas:
- Some stakeholders view the granularity of the due diligence rules as disproportionate as well as unique across wholesale financial markets. Some argue that the rules in effect force investors to act as pseudo-supervisors in verifying that manufacturers of securitisations have adhered to certain standards and complied with applicable rules.

- Some investors have argued that the time and resources it takes them to comply with the current, prescriptive due diligence rules are limiting their ability to make timely investment decisions in times of stress, undermining their competitiveness and the overall liquidity of the market.
- Some investors point out that the due diligence rules prevent them from investing in certain overseas securitisations; for example, the majority of U.S. CLOs, which are not subject to risk retention requirements. Certain investors, therefore, argue that these rules limit their ability to diversify investments, potentially reducing risk adjusted returns. They also note that the rules negatively impact the ability of UK asset managers to compete internationally.

- 3.6** We have considered the feedback and are proposing changes to the due diligence rules which aim to make them more proportionate and avoid putting UK firms at a competitive disadvantage.
- 3.7** We believe that it remains critical for institutional investors to 1) require, receive and review the appropriate amount of information about a securitisation, 2) understand and assess the risks they are taking and whether they fit within their investment objectives and appetite and 3) monitor the performance of their investment throughout its holding period.
- 3.8** We propose to move away from the prescriptive nature of the current framework and instead adopt a more principles-based approach where the depth and extent of the due diligence more closely align to the level of risk of the investment and to the requirements already applicable to other investment products.

## Verification of manufacturers' compliance with standards and rules

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- 3.9** The current rules require that, prior to holding a securitisation position, an institutional investor verifies:
- that originators are granting credits on the basis of sound and well-defined criteria and through clearly established processes;
  - that the manufacturer of the securitisation retains a material net economic interest of no less than 5% in the securitisation; and
  - that the manufacturer has made available sufficient information to enable the institutional investor independently to assess the risks of holding the securitisation position, and has committed to make further information available on an ongoing basis, as appropriate. The rules set minimum standards for the nature and frequency at which such information must be provided.
- 3.10** Verifying manufacturers' compliance with the requirements of the securitisations' conduct rules is not only perceived by some stakeholders as highly burdensome and duplicative of the obligations falling onto the manufacturers but also as a quasi-supervisory responsibility not suitable to be performed by investors. In the context of the current framework, it is also the mechanism through which UK institutional

investors are prevented from investing in overseas securitisations that do not conform to UK standards.

- 3.11** We are of the view that this is an unnecessary and disproportionate burden on FCA-regulated institutional investors.
- 3.12** Accordingly, we propose to remove the verification requirements for credit granting, transparency and risk retention in their current form and replace them with obligations or guidance that we consider will deliver on our objectives in a more proportionate manner as set out below.

## Verification that sufficient information is made available

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- 3.13** The current rules require institutional investors to verify that the manufacturers have made available sufficient information to enable them to independently assess the risks of the securitisation. They must also verify that the manufacturers have committed to make further information available on an ongoing basis. Finally, the rules include a list of information that must be included at a minimum together with the frequency at which such information must be provided.
- 3.14** We propose to continue to require that the investors ensure they receive sufficient information to assess their risk. We believe that it is essential for investors to be able to understand the risk they are taking and that to perform an adequate analysis of the risk, they must have enough relevant information at their disposal. Similarly, we believe that investors must ensure that they are able to monitor the performance of their investment and as such, must have access to ongoing information.
- 3.15** Consequently, we are proposing to specify that institutional investors must be satisfied that manufacturers make available sufficient information to enable the institutional investor independently to assess the risks of holding the securitisation position and are committed to make further information available on an ongoing basis, to enable the monitoring of the performance of the securitisation position and the underlying exposures. Such commitment could be obtained in writing or agreed on the basis of other accepted market practices.
- 3.16** However, we don't believe that a prescriptive list of information that needs to be provided is flexible enough to account for the type of investment, the risk or size of the investment and the predicted holding period. Therefore, we are proposing to add a guidance provision which sets out that the information made available to undertake the initial due diligence assessment which also provides that the information should be proportionate to the risk of the investment. We are also proposing to no longer specify the information that, as a minimum, manufacturers must make available to investors and the frequency with which such information must be obtained. Instead, we propose to offer guidance as to the type of information that investors should consider obtaining from manufacturers.

**3.17** We have reflected these changes in SECN 4.2.1R (1)(e) as well as in guidance at 4.2.1A G.

**Question 1:** **Do you agree with our proposals and their focus on ensuring that institutional investors obtain sufficient information from the manufacturer of the securitisation? Please elaborate on your response.**

**Question 2:** **Do you agree with the proposal to remove the table at SECN 4.2.1 R (1)(e) and the addition of corresponding guidance? Please elaborate on your response.**

### **Verification of credit granting standards**

**3.18** The current rules require that the institutional investors verify the originator's or original lender's compliance with applicable credit granting standards. This requirement currently differs depending on whether the manufacturer of the securitisation is established in the UK or not, and this requirement does not apply where the originator or originator lender is a UK established CRR firm or FCA investment firm.

**3.19** We propose to remove the requirement to verify compliance with the credit granting criteria. Instead, we are proposing that, unless the originator or original lender is a UK established CRR firm or FCA investment firm, institutional investors must consider originators' credit granting standards and processes and form their own view as to whether they are robust enough to suit their risk appetite. This approach aligns with our view that the due diligence rules need to be less prescriptive and rely on sectoral due diligence requirements, including rules deriving from UCITSD and AIFMD which already set requirements on due diligence that apply across financial instruments and do not single out securitisation specifically.

**3.20** This change is reflected in SECN 4.2.2R(1)(h).

**3.21** For Asset-backed Commercial Paper (ABCP) transactions, we propose to apply the same approach to sponsors, under SECN 4.3.1(R)(2).

**Question 3:** **Do you agree with our proposals to require institutional investors to form their own view on the robustness of the credit granting processes without prescribing how this should be done? Please elaborate on your response.**

### **Verification of risk retention requirements**

**3.22** The current rules require that institutional investors verify that the originator, sponsor or original lender retains a material net economic interest of no less than 5% in their securitisation.

- 3.23** Risk retention is the only method of ensuring alignment of interest between a manufacturer and the investors in securitisations that is currently permitted under our rules. As a result, UK institutional investors are unable to gain exposure to securitisations that are not subject to risk retention requirements similar to those applicable in the UK.
- 3.24** This is perceived by some institutional investors as limiting their ability to compete with overseas firms.
- 3.25** We consider that features that ensure alignment of interests between the manufacturers of a securitisation and the investors are an important safeguard against bad practices, including the "originate to distribute model". We therefore want to ensure that, before investing in a securitisation, UK institutional investors give due consideration to the structural features in place to ensure alignment of interest. But we do not consider the current approach to be appropriately calibrated as it prevents UK institutional investors from exercising their judgement as to whether an investment is appropriate in the context of their mandate and risk appetite, and in line with all applicable sectoral rules.
- 3.26** Accordingly, we propose that, as part of their due diligence assessment, institutional investors must be satisfied that a non-UK originator, sponsor or original lender maintains, on an ongoing basis, a sufficient and appropriate alignment of commercial interest in the performance of the securitisation. This proposed provision in SECN 4.2.1R(1)(d) is then supported by guidance in SECN 4.2.1 BG where we set out, in a non-exhaustive manner, how, for the purposes of SECN 4.2.1R(1)(d), a sufficient and appropriate alignment of commercial interest could be achieved between manufacturers and investors, in the absence of which the UK institutional investor should refrain from investing.
- 3.27** We note that these proposals do not modify existing requirements applicable to UK manufacturers as regards risk retention. A broader discussion on the scope of the securitisation framework can be found in chapter 10 of this CP.
- 3.28** We consider that these changes will expand the universe of potential investments for UK investors, enabling them to better diversify their portfolios and, potentially, to improve their risk-adjusted returns.

**Question 4:** **Do you agree with our proposal to replace the requirement for institutional investors to verify manufacturers' compliance with the 5% risk retention rule with a requirement that the investor satisfy itself that a mechanism exists that aligns their commercial interest to that of the manufacturer of the securitisation? Please elaborate on your response.**

**Question 5:** **Do you agree with our proposed guidance in SECN 4.2.1B G on how such alignment can be achieved? Please elaborate on your response.**

## Due diligence before investing

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- 3.29** Beyond verification of certain manufacturers' obligations, the current framework sets out a number of requirements on investors to assess their prospective investment in a securitisation. These include conducting:
- an assessment of the securitisation and its underlying exposures' credit risk, including credit quality, diversification and historical performance;
  - an assessment of the securitisation's structural features, such as credit enhancement features, liquidity support features, cash flow waterfalls, investor voting rights and triggers affecting the securitisation; and
  - if relevant, an assessment of compliance with Simple, Transparent, and Standardised (STS) securitisation criteria.
- 3.30** We propose changes to make these provisions less prescriptive and instead more proportionate to the level of risk of the investment. Whilst we still require that investors consider and understand all structural features and risk characteristics of the securitisation investment, we propose to no longer make it a requirement for investors to review a specified list of structural features.
- 3.31** We seek to achieve this by deleting the list of the structural features that investors must assess under SECN 4.2.2R(1)(b). In its place, we lay down guidance, set down in SECN 4.2.2B G, as to the type of structural features that can materially impact the performance of the securitisation. This is intended to afford institutional investors more discretion as to which specific features of their investment they deem important to assess in line with financial materiality considerations, and other factors.
- 3.32** Prior to holding a securitisation position, the current rules specify that an institutional investor must assess compliance with the STS requirements set out in SECN 2 for a UK STS securitisation, or, alternatively, assess that securitisations which appear to be overseas STS securitisations are compliant with specific rules. In making these assessments, a UK institutional investor can rely, to an appropriate extent, on certain notifications and on the information disclosed by the manufacturer, without solely or mechanistically relying on that notification or information.
- 3.33** We propose to remove the requirements placed on investors to verify the STS status of a securitisation. We would achieve this by deleting SECN 4.2.2R(1)(c) to (g).
- 3.34** We consider that the STS status of a securitisation should not automatically impact the level of due diligence an investor must undertake. Investors should conduct an appropriate amount of due diligence on their securitisation investments. Whether such due diligence ought to include matters related to STS status, should, in our opinion, depend, among other things, on whether such status (or lack thereof) could have a material impact on the performance of the investment.

**Question 6: Do you agree with our proposal to no longer prescribe the list of structural features investors are required to assess and to simplify due diligence requirements for STS securitisations? Please elaborate on your response.**

## Due diligence while holding a securitisation position

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**3.35** SECN sets out a number of due diligence requirements that must be satisfied on an ongoing basis for as long as an institutional investor holds a securitisation position. These obligations apply both to investors that have invested in a securitisation at issuance and to those that have purchased it in the secondary market. In brief, these requirements currently entail:

- establishing written procedures to monitor compliance for the risk management of the securitisation position and for maintaining records of the verifications and due diligence;
- stress testing of the securitisation's cash flows and underlying exposures, or, for fully supported ABCP programmes, the solvency and liquidity of the sponsor;
- ensuring internal reporting to the investor's management body; and
- investors being able to demonstrate, upon request, that they have a comprehensive and thorough understanding of the securitisation position and its underlying exposures and that they have implemented written policies and procedures for the risk management of the securitisation position and to maintain records of the verifications and due diligence in accordance with SECN 4.2.1R and SECN 4.3 and of any other relevant information.

**3.36** These ongoing requirements in relation to the performance of the securitisation are prescriptive. Whilst we continue to require investors to monitor the performance of their securitisation investments and associated underlying exposures, we consider that this level of detail is overly granular and duplicative of more general requirements contained in sectoral legislation and applicable to all financial instruments, including securitisations.

**3.37** In our view, the current approach also fails to take into account the degree of actual risk that investors are exposed to. We think that investors should be able to conduct different forms of monitoring for ongoing due diligence, where the level of risk attached to a specific securitisation justifies a different approach.

**3.38** Similarly, the rules currently specify that investors must perform stress tests on a securitisation position's underlying exposures or ABCP programme sponsor. For similar reasons to the ones set out above, we believe this does not need to be prescribed.

**3.39** Our rules include a requirement that investors establish written policies and internal reporting procedures up to its management body regarding ongoing monitoring of securitisation positions. We consider that such a requirement is justified where the actual level of risk the institutional investor is exposed to warrants it and should not be imposed on institutional investors beyond what is already required of them by other rules.

- 3.40** We therefore propose to continue to require institutional investors to monitor, on an ongoing basis, the performance of the securitisation position and of the underlying exposures in a manner proportionate to the risk profile of the securitisation position they hold. As part of this, we propose to remove the current prescriptive requirements.
- 3.41** Regarding the requirement to demonstrate a comprehensive and thorough understanding of securitisation positions and their underlying exposures, we are of the view that institutional investors must still achieve this when holding a securitisation position. We note that institutional investors are already subject to rules that require them to demonstrate such comprehensive and thorough understanding of their investments (eg, in SYSC 6.1.1R and SYSC 9.1.1).
- 3.42** The purpose of a due diligence assessment is to provide investors with a comprehensive and thorough understanding of the risks involved. Accordingly, we have included wording reflecting this outcome within SECN 4.2.2R(1). We also continue to expect investors to have effective internal reporting mechanisms in line with existing requirements. In practice this should result neither in imparting a higher standard of due diligence nor a lowering in requirements.
- 3.43** This would result in us:
- no longer specifying the credit quality attributes that investors must monitor as requirements, recasting SECN 4.4.1R(1)(a)-(k) as guidance instead in SECN 4.4.1A G;
  - removing the requirement for institutional investors to perform stress tests on a securitisation's cash flows, underlying exposures and/or solvency and liquidity of an ABCP programme sponsor;
  - removing granular requirements for institutional investors to have in place effective internal reporting to its management body; and
  - removing the requirement for institutional investors to be able to demonstrate to us that they have a comprehensive and thorough understanding of their securitisation investments, as such requirements are covered generally under SYSC 6.1.1R and SYSC 9.1.1R, and reformulating the requirement under SECN 4.2.2R(1).
- 3.44** We consider these changes in aggregate should result in a more effective allocation of resources in meeting due diligence requirements.

**Question 7: Do you agree with our proposal to remove the prescriptive elements in the ongoing due diligence requirements whilst holding a securitisation position? Please elaborate on your response.**

## Ability to invest in certain resecuritisations

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- 3.45** SECN 7 sets out a general ban on securitisations to include any securitisation positions, save for legacy instruments issued prior to 2019 and any securitisation in respect of which the FCA has disapproved, modified or dispensed with this ban such that the underlying exposures may include securitisation positions.
- 3.46** The current rules specify that institutional investors must always apply for a waiver to be able to invest in any resecuritisation other than those that are permitted which includes resecuritisations that the FCA has already 'waived'. We are not proposing to change this mechanism.
- 3.47** However, we are proposing to broaden the universe of resecuritisations that are permitted under SECN 7.2.1(2) R. Accordingly, investors should consider the proposed changes to the scope of the resecuritisation ban set out in chapter 6.

## Chapter 4

# Transparency Requirements

- 4.1** The transparency requirements in the SECN sourcebook are a key part of the UK regulatory framework for the securitisation market. They are intended to ensure that investors, potential investors and the relevant regulatory authorities are provided with sufficient information about securitisation transactions and their related risks, both in the early life of transactions and on an ongoing basis.
- 4.2** Through direct engagement with market participants, feedback to our previous consultation paper CP23/17 and responses to the European Commission's 2024 consultation, we have identified several areas where we consider change would be desirable in relation to the transparency requirements.
- 4.3** The changes we are proposing are aimed at making the reporting regime more useful for investors and less prescriptive for manufacturers. The policy intent has not changed. It is of critical importance for manufacturers to share relevant, comprehensive and good quality information and data about a securitisation to investors, so that investors can understand and assess the risks associated with the transaction. We believe however that more flexibility around how this is done may achieve better outcomes.
- 4.4** The changes we propose include:
- A reduction in the number of reporting templates, in some cases replacing templates with a principles-based approach;
  - moving away from the requirement to produce templates in extensible mark up language (XML) format;
  - an exemption from making information available through underlying exposure templates for single-loan securitisations;
  - a simplification of retained underlying exposures templates and alignment with the Bank of England loan level data templates;
  - the introduction of a simplified underlying exposures template for CLOs;
  - ceasing, in most cases, to treat public and private securitisations differently in the application of transparency requirements;
  - taking steps, in coordination with the Treasury, with a view to no longer requiring information to be reported by manufacturers to regulated SRs; and,
  - an amended, less prescriptive, approach to the provision of underlying documentation relating to a securitisation.
- 4.5** We would also like to take this opportunity to receive feedback on whether it would be desirable to broaden the existing carve-out from the provision of information on securitisations under SECN 6.2.1R for reasons of confidentiality and data protection as set out in SECN 6.2.5R. We explain our thinking on this at the end of this chapter.

- 4.6** Manufacturers of securitisations will continue to be required to provide to investors all documentation essential for the understanding of transactions, underlying exposures information (although not always in a prescribed template depending on the type of exposures), investor reports but not in a prescribed template and inside information or significant event information but not in a prescribed template. In addition, manufacturers will continue to be required to provide STS notifications to investors for STS transactions and the private notifications we currently receive under the 2019 Direction.
- 4.7** Our intention is that this combination of changes will result in a meaningful shift towards a simpler, more proportionate and less costly regime for manufacturers while still maintaining a strong level of market transparency to the benefit of investors and regulatory authorities.

## Reducing the number of templates

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- 4.8** SECN 11 and SECN 12 contain a set of templates which include:
- Annexes 2 to 9: Underlying exposures templates for Non-ABCP securitisations;
  - Annex 10: Add-on underlying exposures template for non-performing exposures;
  - Annex 11: Underlying exposures template for ABCP securitisations;
  - Annexes 12 and 13: Investor report templates (Non-ABCP and ABCP securitisations); and,
  - Annexes 14 and 15: Inside information or significant event information templates (Non-ABCP and ABCP securitisations).
- 4.9** These templates were introduced with the intention of enhancing transparency in the securitisation market by making standardised and comparable information readily available in centralised repositories, allowing investors to complete their due diligence more easily.
- 4.10** However, feedback from industry indicates completion of the templates is costly and burdensome for manufacturers and that not all of the templates are considered useful by investors.
- 4.11** We have considered simply retiring all reporting templates and relying solely on the general reporting requirements currently in our rules. However, investors' feedback was not positive arguing that some templates were helpful and used, and the general disclosure requirements were deemed too high level to serve their needs.
- 4.12** As discussed below, we therefore propose to delete certain templates and replace them with a more principles-based approach calibrated for each asset class, create a specific (and simpler) underlying exposures template for CLOs and where other templates are retained, to simplify them and align them more closely to the loan-level templates that the Bank of England requires to be submitted when receiving certain types of collateral in the context of its market operations. We also propose moving away from the requirement to produce templates in XML format and instead requiring any electronic and machine-readable format.

## Moving to a principles-based approach for certain Non-ABCP securitisations

- 4.13** Our rules currently require the information on underlying exposures to be disclosed via prescribed templates (at SECN 11 and 12 Annexes 2 to 9) for each of the asset classes from which underlying assets are typically drawn, including an 'esoteric' template for underlying exposures that do not fall into one of the other asset classes.
- 4.14** Through focused engagement with relevant market participants, we understand that investors value standardised reporting of underlying exposures, although they pointed out that there are certain asset classes for which this mechanism is not well suited. Through this engagement, we had the opportunity to discuss the asset classes for which we consider that standardisation of reporting is not suitable and may create a level of burden on manufacturers which is not proportionate to the benefits to investors. For those asset classes, we are proposing to remove the requirement to complete the underlying exposures templates. These include:
- **Short-term highly granular exposures such as credit card receivables and trade receivables.** Relevant investors' feedback suggests that underlying exposures information is not normally needed. Investors indicated that they would usually prefer to be provided with aggregated information in tables of stratification data which capture the material credit quality, performance and risk characteristics of the exposure pools as they evolve over time.
  - **Commercial real estate exposures**, which tend to include relatively few exposures and where there can be considerable variation between transactions. Given these characteristics, as well the relatively low volume of transactions, we consider it may be disproportionate to apply a prescribed template for this asset class. We also note attempts by market participants to develop market-driven reporting standards which stalled in part due to the introduction of prescribed templates as well as low volume of transactions. There is reason to think that adequate market-driven reporting standards would develop in this market segment in tandem with market growth. We would welcome such a development.
  - While we propose a new simplified underlying exposures template for CLOs, which we intend to be better suited to CLOs than the current SECN 11 and 12 Annex 4, **we propose to move away from a prescribed template for securitisations of corporate exposures which are not CLOs.** We recognise that the corporate securitisation market is varied, including securitisations of small and medium-sized enterprise (SMEs), of large corporates, of rated or unrated corporates etc. and therefore a standardised template may not be adapted to a heterogeneous market. We believe that removing such a template is a more proportionate approach and could allow for the emergence of market-driven reporting in the future.
  - **Esoteric exposures:** this template was designed for small or new asset classes for which there is no relevant underlying exposures template set out in SECN. However, it could cover an incredibly wide range of possible securitisations, including on new

underlying assets. A one-size-fits-all approach may not appropriately reflect the unique nature of each asset class and can act as a barrier to innovation whilst not being meaningful for investors. We also consider it may be disproportionate to apply a prescribed template for asset classes with a low volume of transactions.

- 4.15** We therefore propose to cease requiring submission of the templates at SECN 11 and 12 Annexes 3, 4, 7 and 9 which correspond to the underlying exposure templates for commercial real estate, corporate, credit cards and esoteric exposures (but introduce a new template for corporate exposures of a CLO at SECN 11 Annex 4A).
- 4.16** That does not mean that manufacturers should not report on securitisations with those underlying asset classes but that a unique and prescriptive template may not be the only way to meaningfully report on such underlying assets. We believe that the right outcome for investors may be better achieved by describing the type of information and data that manufacturers must report on but leave it to them to choose the most appropriate way to disclose them in practice. As such, we are proposing to introduce new language into SECN 11.3 reflecting a principles-based approach to disclosure of underlying exposures for those asset classes. This language aims to reflect the following:
- For short-term highly granular exposures, we emphasise the need to provide aggregated information on underlying exposures in tables of stratification data reflecting credit quality and risk characteristics. We are proposing that this is provided through investor reports (without any prescribed template).
  - For commercial real estate, we emphasise the need to provide information on the underlying loans, the tenants and the loan security.
  - For corporate exposures (which are not exposures in a CLO and are not short-term highly granular exposures), we focus on the need to provide information on the underlying loans, information on the borrowers including industry and financial information and loan security.
  - For other small or new asset classes we emphasise the need to provide information on the contractual terms of the underlying exposures and the loan security if applicable.

**Question 8:** **Do you agree with our proposal to move to a more principles-based approach for disclosure of underlying exposures for certain asset classes and delete SECN 11 and 12 Annexes 3, 4, 7 and 9? Please elaborate on your response.**

**Question 9:** **Do you agree with our proposed changes to SECN 11.3? Please elaborate on your response.**

## Moving to a principles-based approach for ABCP securitisations

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- 4.17** Due to the high turnover of the underlying exposures in ABCP transactions and programmes, investors indicated that the underlying exposure template for ABCP may be of limited use because the data quickly becomes stale.
- 4.18** We therefore propose to stop requiring the compilation of the underlying exposures template for ABCP (SECN 11 and 12 Annex 11).
- 4.19** Instead, we propose to require that underlying exposures information be made available in aggregated form to investors on a monthly basis and that underlying exposure information at individual exposure level be made available to the sponsor and upon request to investors and potential investors. These requirements are now set out in SECN 6.2.1R(1)(b) and 6.2.3R.
- 4.20** We will continue to require that investor reports are made available for ABCP securitisations on a monthly basis, including the type of information which we consider to be of a minimum acceptable standard, but we will no longer specify a template by which this information should be made available. An investor report could be the mechanism through which the aforementioned information on underlying exposures is provided.

**Question 10: Do you agree with our proposal to replace the underlying exposures template for ABCP (SECN 11 and 12 Annex 11) with a more principles-based set of requirements as set out in SECN 6.2.1R(1)(b)? Please elaborate on your response.**

## Moving to a principles-based approach for investor reports and inside information or significant event reporting

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- 4.21** The introduction of prescribed templates for investor reports (SECN 11 and 12 Annexes 12 & 13) and inside information or significant event information (SECN 11 and 12 Annexes 14 & 15) was intended to help standardise the information made available to investors across asset classes thereby making it easier to collate performance information and make comparisons across issuers and transactions. However, this approach does not seem to have achieved the intended outcome. Manufacturers have pointed out that the process of producing the templates is costly and burdensome, particularly for certain asset classes and is not always suited for all asset classes.
- 4.22** Conversely, we were told by investors that they are generally satisfied with the investor reports they obtain from administrators or trustees which tend to be tailored to the type of underlying exposures and the specific details of the securitisation liabilities and structural features such as tests and triggers.
- 4.23** We are of the view that investor reports are critical for informing investors of the performance of their investments. We recognise however that the information

needed to be produced may vary depending on the underlying asset class, the type of securitisation and established market practices. Prescribing one investor report template across the whole securitisation market may therefore not be flexible enough to reflect the specifics of each securitisation and not very useful to investors.

- 4.24** Accordingly, we propose to continue to require that investor reports are made available, including by setting out the type of information which we consider to be of a minimum acceptable standard, but we will no longer specify templates by which this information should be made available.
- 4.25** Similarly, in the case of the inside information or significant event templates, investors questioned whether the templates are duplicative where inside information or significant event information should already be provided because of market abuse regulations or required by transaction documents.
- 4.26** We believe that it is essential that investors are informed of inside information and significant events in order to monitor their investments and we therefore intend to keep the requirement that such information be made available. However, we do not feel that a prescribed template to communicate this information has proven efficient. We want to be proportionate and ensure that the information is communicated in a timely manner, which we hope can be achieved more easily without the prescribed template. However, we note that for inside information, MAR Article 17 and DTR 6.3.3 require inside information which is publicly disclosed, to be clearly identified.
- 4.27** We propose therefore to cease requiring manufacturers to compile and submit the templates at SECN 11 and 12 Annexes 12, 13, 14 and 15. These annexes would be deleted from SECN 11 and 12, but principles-based requirements would remain in SECN 6.2.1R (5), (6) and (7).
- 4.28** Notifications of inside information and significant events on private securitisations to the FCA must still be made in the relevant annexes of the private notification template in SECN 6.4 Annex 1R, 2R or 3R.

**Question 11: Do you agree with our proposal to replace the investor report and inside information or significant event templates (SECN 11 and 12 Annexes 12, 13, 14 and 15) with more principles-based requirements? Please elaborate on your response.**

## Format of templates and data fields

- 4.29** SECN 12 currently requires that the information provided in the transparency templates be made available in an electronic and machine-readable form via common XML templates.
- 4.30** Investor feedback highlighted difficulties accessing and processing data in XML format especially for smaller investors who may lack dedicated specialist IT resource. We were also told that investors sometimes faced a one-day delay in receiving query results

following the submission of an XML query to an SR and that the results often contained inconsistencies in how manufacturers had completed the templates. These difficulties, generated by the choice of XML, have pushed investors to use alternative sources of information which are available in more accessible formats (e.g. the Bank of England loan-level templates).

- 4.31** When the templates were introduced, prescribing the format was intended to make it easier for investors and regulators to collate and aggregate market data across issuers and transactions. Unfortunately, the intended outcome has not been achieved and on the contrary the format has proven to be a burden on manufacturers and investors alike. We considered prescribing a different format to try to achieve the same objective by a different means, but this could also prove burdensome particularly if technological developments resulted in the new prescribed format becoming outdated quickly.
- 4.32** On balance, we concluded that it is more important that manufacturers can easily disseminate information to their investors and that investors can easily access and use the information once made available. We therefore propose to stop requiring that transparency templates be made available in XML and to give more flexibility in the choice of format, as long as it is electronic and machine readable.
- 4.33** SECN 12 also prescribes formats and standards for the data fields within the current templates. Later in this chapter we discuss our proposal to align those of the underlying exposure templates which we propose to retain with the Bank of England loan level data templates. Accordingly, we propose to adopt the field format conventions used in the Bank of England templates. This data type, format and length requirement for each data field are included in the templates themselves which are shown in SECN 11 of the draft Handbook text (Appendix 1). As a result of the combination of changes we propose to the transparency requirements, SECN 12 would be deleted in its entirety.

**Question 12:** Do you agree with our proposals to (i) stop requiring that transparency templates be made available in XML and (ii) no longer impose a uniform file format? Please elaborate on your response.

**Question 13:** Do you agree with our proposals as regards the format in which the various data fields within the retained templates are to be populated? Please elaborate on your response.

## Disapplication of underlying exposure templates for single-loan securitisations

- 4.34** Industry feedback, including to the PRA's consultation paper CP13/24, noted the disproportionate operational and cost burden of applying transparency requirements for single loans securitisations under the UK government's Mortgage Guarantee Scheme (MGS) or private schemes that provide guarantees. Such requirements can deter issuance of mortgages and other loans covered by some form of credit protection as

well as creating other undesirable consequences, including the inability to securitise such loans under the current rules effecting the ban on resecuritisation (please see chapter 6 for more detail on our proposals on resecuritisations).

- 4.35** The PRA has previously clarified that it is not minded to enforce the use of disclosure templates for single loans under the MGS and similar private schemes.
- 4.36** We, and the PRA, propose to go further and exempt any single-loan securitisations (whether residential mortgage-backed securities (RMBS) or not, and whether benefiting from credit protection or not) from the requirement to make underlying exposures information available in the prescribed underlying exposure template.
- 4.37** Firms would, however, remain subject to the broader transparency requirements, which specify the type of information required to be disclosed in more general terms.
- 4.38** This proposal would be implemented through an amendment to SECN 11.3.1R(1) to make an exception to the completion of the retained underlying exposures templates for securitisations which comprise a single underlying exposure.

**Question 14: Do you agree that provision of underlying exposure information in the proposed amended SECN 11 templates is not useful in the case of a securitisation with a single underlying exposure? Please elaborate on your response.**

## **Retaining certain templates while aligning them to the Bank of England templates**

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- 4.39** We propose to retain underlying exposure templates for more mature and homogeneous asset classes where investor feedback indicates standardised reporting is more useful. We propose to retain the requirement on manufacturers to produce and make available templates as will be set out in the proposed amended SECN 11 Annex 2 (Residential Real Estate), Annex 5 (Automobile), Annex 6 (Consumer) and Annex 8 (Leasing).
- 4.40** While retaining templates for these asset classes, we propose to modify them to align them to the loan level data templates used by the Bank of England for assessing eligible collateral for its lending facilities. A number of investors indicated that the Bank of England loan level data templates are a good source of underlying exposures information.
- 4.41** For those manufacturers whose securitisations are likely to be submitted for assessment as eligible collateral, we also expect the alignment of templates between the Bank of England and the new proposed templates to result in simplified and streamlined regulatory reporting leading to lower overall costs in aggregate.

**4.42** Our approach to the harmonisation of the two sets of templates consisted of these steps:

- We retained common fields which previously existed in both templates, but introduced the Bank of England overall template format, field numbers, field names, field definitions and data types or formats.
- Where the Bank of England template included fields which were not included in the SECN templates, we have generally left those rows blank in the redesigned SECN templates, in order to keep them closely aligned to the Bank of England templates.
- Where the SECN templates included fields which were not in the Bank of England templates, we have carefully assessed the relevance and usefulness of those fields and retained what we consider to be essential fields. For ease of use, these fields are now included at the bottom of the new SECN templates.
- In a very small number of instances, we have introduced a new field or amended field details in response to industry feedback.
- In aggregate, these steps generally result in a reduction in the number of fields as illustrated in the following table.

| Underlying exposures type | Number of fields in current template | Number of fields in proposed template |
|---------------------------|--------------------------------------|---------------------------------------|
| Residential Real Estate   | 107                                  | 96 (71 mandatory)                     |
| Automobile                | 84                                   | 73 (56 mandatory)                     |
| Consumer                  | 69                                   | 59 (47 mandatory)                     |
| Leasing                   | 84                                   | 86 (69 mandatory)                     |

**4.43** In addition, we propose to retain an add-on template for non-performing exposures (the proposed amended SECN 11 Annex 10 (Non-performing exposures)). While there is no corresponding template used by the Bank of England for assessing eligible collateral, we have redesigned the template so that its overall format is similar to the other new SECN templates. We have made no substantial changes to the content of the template but we would welcome feedback on potential improvements.

**4.44** The FCA also proposes to delete SECN 11.3.4 as it exists solely for the purposes of 11.3.3, and instead to use the Handbook Glossary definition of NPE securitisation for the purpose of 11.3.3. This change will ensure consistency by applying a single definition across SECN. The FCA considers that this proposal is unlikely to have any practical impact on firms, while supporting the overall coherence of the rules.

**4.45** For those manufacturers whose securitisations are likely to be pre-positioned or used as collateral with the Bank of England, we expect the transition to the new SECN templates to be straightforward. We plan to further facilitate the transition for such securitisations by introducing guidance in SECN 11.3.8G which allows a reporting entity to satisfy the requirement to provide underlying exposures information in the proposed new SECN 11 Annex 2 for residential real estate by using the Bank of England residential mortgages / RMBS loan level data template, as long as it provides alongside that template any

information required by SECN 11 Annex 2 which is not included in the proposed new template (we discuss this in more detail in chapter 9).

- 4.46** For manufacturers who do not fall into this category and for manufacturers who plan to market their securitisations to EU investors, we intend to facilitate the transition and are proposing that the current EU templates can continue to be used instead of the new SECN templates for as long as we deem it useful (we discuss this in more detail in chapter 9). We intend to revisit this position if the EU templates are amended.
- 4.47** To assist consideration of the above proposals, we have provided online versions of the proposed new templates which are marked up against the Bank of England loan level data templates and additional information comparing these to the current FCA Excel files available on the Securitisation webpage. The online versions can be found [here](#).

**Question 15:** **Do you agree with our proposal to retain underlying exposures templates for Residential Real Estate, Automobile, Consumer, Leasing and Non-performing exposures? Please elaborate on your response.**

**Question 16:** **Do you agree with our proposal to align the retained templates to the Bank of England loan level data templates? Please elaborate on your response.**

**Question 17:** **Do you have any comments on the new templates for SECN 11 Annex 2 (Residential Real Estate), Annex 5 (Automobile), Annex 6 (Consumer), Annex 8 (Leasing) or Annex 10 (Non-performing exposures), for example on the fields included or excluded, the order of the fields or the inclusion of blank fields? Please elaborate on your response.**

## Developing a specific template for CLOs

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- 4.48** We have received feedback from CLO managers that the SECN 11 and 12 Annex 4 template for corporate underlying exposures is not well suited to the CLO market, noting that approximately 25% of the data fields are not applicable to CLOs. Further feedback on the Collateral information section of SECN 11 and 12 Annex 4 (which is intended to capture loan or bond security information for each exposure) suggests there are challenges in completing this section with useful information and called into question the validity of attempts to capture this type of information in a prescribed template.
- 4.49** CLO investors told us that they are generally satisfied with CLO managers' reports. There are various degrees of reliance on the underlying exposures information with investors in equity or mezzanine notes sometimes placing more emphasis on the underlying exposures information than investors in the most senior tranches.

- 4.50** The CLO market is a large and mature market, and the FCA considers that standardised disclosures of underlying exposures can be beneficial to investors and can facilitate supervisory work by the FCA. We might consider disapplying the requirement to complete this template during the warehouse phase of a CLO and we would welcome feedback on this proposal.
- 4.51** We propose a new simplified template, SECN 11 Annex 4A for CLOs, which includes 43% fewer data fields than the current SECN 11 and 12 Annex 4. This reduction is driven by the deletion of fields which are not applicable to CLOs and by the replacement of the Collateral information section with a single data field to capture information on the loan security of each exposure. Our intention is that the proposed new SECN 11 Annex 4A template should be more relevant for the CLO market and simpler for manufacturers to complete.
- 4.52** While there is no corresponding template used by the Bank of England for assessing eligible collateral, we have redesigned the template so that its overall format is similar to the other new SECN templates.

**Question 18:** **Do you agree that this proposed new template SECN 11 Annex 4A is better suited to CLOs than the current one in SECN 11 and 12 Annex 4? Please elaborate on your response.**

**Question 19:** **Do you have any comments on the proposed fields included in (or excluded from) the proposed new SECN 11 Annex 4A for CLOs? Please elaborate on your response.**

**Question 20:** **Should the requirement to complete SECN 11 Annex 4A apply during the warehouse phase of a CLO? Please elaborate on your response.**

## **Simplification of 'no data' rules**

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- 4.53** SECN 11 sets out five possible 'No data options' to indicate the reason why information is unavailable for inclusion in the templates. In order to simplify the requirements and to align with the Bank of England loan-level data templates, we propose to adopt the approach taken by the Bank of England by distinguishing between mandatory and optional data fields and by allowing only one type of 'No data' response.

**Question 21:** **Do you think that some significant information will be lost by making this simplification to the no data rules as they apply to completion of underlying exposure templates? Please elaborate on your response.**

## Removing the distinction in treatment between public and private securitisations

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- 4.54** SECN 6 draws a distinction in the application of the transparency requirements, depending on whether a prospectus is required under the FCA's rules in 'PRM Admission to Trading on a Regulated Market' (PRM), i.e. whether they are public or private securitisations. Broadly speaking, public securitisations are those traded on a UK regulated market. Public securitisations are currently subject to more transparency requirements than private securitisations including additional transparency templates (e.g. inside information or significant event template) and the requirement to make information available via a regulated securitisation repository.
- 4.55** In the discussion chapter of CP23/17 we discussed the delineation between public and private securitisations and noted two issues with the current framework. First, that there were some securitisations which are public in substance that are not usually captured by the transparency requirements intended for public securitisations. The second issue related to difficulties with the reporting regime for private securitisations such as a perceived lack of proportionality, the content of the information reported and its usefulness to investors. Our intention was to refine the definition of public securitisations and create a lighter transparency regime for private securitisations.
- 4.56** We discussed three options to change the definition of public (and private) securitisations and noted our preferred option of expanding the public definition to include more transactions which are public in substance.
- 4.57** We received diverse feedback from market participants and trade bodies highlighting difficulties in capturing transactions which are truly public in substance.
- 4.58** Some responses noted that expanding the public definition to capture transactions listed on non-UK venues or Multilateral Trading Facility (MTFs) would be inappropriate because these listings are often created for reasons other than liquidity and secondary trading, such as for tax purposes or investor preferences.
- 4.59** Other responses argued that introducing additional criteria to determine the nature of a securitisation, such as public communication about a transaction or number of investors could introduce ambiguity and interpretation issues.
- 4.60** Further feedback stated that capturing the ability of investors to negotiate relevant terms and conditions of a securitisation investment is difficult to execute in practice and could result in regulatory ambiguity.
- 4.61** More recent engagement highlighted that investors consider transparency obligations should apply based on the type of underlying exposure rather than hinging on whether a transaction is public or private.
- 4.62** Having reflected on the varied feedback received, we propose to no longer distinguish between the treatment of public and private securitisations in relation to the transparency requirements in SECN. For any asset class where we propose to keep the requirement to provide information in underlying exposure templates, that

requirement would apply to all transactions, whether they were previously classified as private or public. This change needs to be understood in the context of the other proposals in this chapter such as the removal of the requirement to report information to a regulated securitisation repository, the removal of investor report templates and inside information and significant event templates and the simplification or removal of underlying exposures templates. Accordingly, we propose to remove the delineation in treatment between public and private securitisations in SECN 6.2(R), SECN 6.3(R) and SECN 11.1(R).

- 4.63** Our rules will continue to distinguish between requirements for private and public securitisations for the purposes of the STS notification requirement and the notification of private securitisations currently required under the Direction issued by the FCA and the PRA in 2019 and which we propose to replace with new rules in SECN 6 (discussed later on in this chapter).

**Question 22: Do you agree with our proposal to remove the distinction in treatment between public and private securitisations regarding the majority of the transparency requirements? Please elaborate on your response.**

## The role of securitisation repositories (SRs)

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- 4.64** As set out earlier in this chapter, we propose to stop distinguishing between the treatment of private and public securitisations for the majority of the transparency requirements, to reduce the number of prescribed templates and to cease imposing a specific format for the provision of those templates.
- 4.65** The policy choices behind those proposals have led us to further consider the overall architecture of the transparency framework.
- 4.66** Pre-dating the introduction of rules applicable to them by virtue of the EU securitisation framework, securitisation repositories responded to a market need and were incorporated into the regulatory framework with the intention of providing centralised and standardised data on the securitisation market to investors and regulators.
- 4.67** A number of investors have indicated to us that they do not tend to access data through securitisation repositories. They cited various reasons for this, including the format (XML), the content and nature of the information included in the mandatory templates, and some also said they have concerns around the quality and consistency of data of the regulatory templates. Instead, some investors obtain the data they need either directly from the manufacturers or from commercial data providers, including because they can obtain information that is more helpful and relevant to making their investment decisions.

- 4.68** Having weighed all of these factors, we consider that with very few templates remaining in place, it is difficult to justify the costs for manufacturers to report to repositories when the information does not seem to be widely used by investors. Ceasing to require UK manufacturers to submit information to repositories would result in cost savings and lower barriers to entry for manufacturers. This is discussed in more detail in the cost benefit analysis (CBA) in Annex 2.
- 4.69** More generally, we note that the EU transparency framework was introduced to achieve a centralised set of comparable disclosures that could provide a platform to be used by investors across Europe. We are not convinced that the potential benefits of this approach have been fully realised in the UK, and we are also mindful that some of the advantages of information clustering may no longer apply.
- 4.70** We have considered alternative options such as maintaining the requirement to report to regulated SRs while moving away from the mandated XML format and simplifying the templates. This might encourage investors to use SR data more widely. We are of the view however, that we should not prescribe the sources from which investors may look to receive their information. We believe instead that market practice will naturally dictate how information may be accessed.
- 4.71** Furthermore, we think that it is difficult to align the transparency requirements for public and private securitisations while maintaining reporting of information to regulated SRs given industry's feedback to the European Commission's 2024 consultation regarding the proposal that private securitisations be reported to a regulated SR. Concerns were raised such as loss of confidentiality, increased and disproportionate costs to issuers without any apparent benefit since the information would not be made public.
- 4.72** Taking into account the various factors discussed above, we are proposing to stop mandating by regulation that manufacturers must report to SRs. SECN 6.3 would instead specify that the information required to be provided by our rules must be reported by means that are accessible to investors and potential investors and managed with appropriate governance, systems and controls. Unregulated securitisation repositories could be a way of satisfying this obligation.
- 4.73** Indeed, we consider it critical that investors have easy and free access to the information they need. As such, we believe there is an important role for centralised repositories of data for securitisation investors to offer issuers and investors a market-led service. But it is not clear to us that these have to be regulated in order to achieve this outcome although this is a matter for the government to decide on.
- 4.74** Part 5 of the UK SR 2024 sets out the framework under which a body corporate can apply to the FCA for registration as a securitisation repository, relevant eligibility requirements, conditions for registration and withdrawal, and other matters. It also empowers the FCA to make rules that apply to securitisation repositories and to impose requirements.
- 4.75** Following discussions with the Treasury, we understand that they are considering laying before Parliament a SI which will amend relevant parts of the UK SR 2024 requiring SRs to be regulated by the FCA.

- 4.76** We are working closely with the Treasury to reflect changes to the legislation in SECN. This will entail the deletion of the entirety of SECN 9 as well as of relevant rules in SECN 6 (including SECN 6.3.2R) that currently require reporting entities to make information for a securitisation transaction available by means of a securitisation repository registered by the FCA. Subject to the making of a Statutory Instrument (SI), we propose that the changes to our rules will come into effect accordingly.
- 4.77** We provide more detail on implementation in Chapter 9.
- 4.78** The FEES manual would be amended to reflect the removal of SRs.

**Question 23: Do you agree with the removal of the requirement for information to be reported to securitisation repositories? Please elaborate on your response.**

## Provision of documentation

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- 4.79** SECN 6.2.1R(2) requires manufacturers to provide all documentation essential for the understanding of a securitisation position and specifies the list of documents which should be included where applicable. This requirement applies to all securitisations. The list of documents in sub-paragraphs (b) to (g) includes documents which apply to some transactions, but not to all, and we are keen to understand the usefulness of this list, as it was intended to ensure that investors have access to a wide range of transaction documents. Based on limited feedback, we see an opportunity to simplify and clarify this requirement so that it emphasises the provision of all relevant transaction documents for both public and private securitisations in a broadly consistent way.
- 4.80** Industry feedback suggests that investors rely mainly on the offering document or prospectus for public transactions. However, investors indicated that depending on the nature of a particular transaction or the track record of manufacturers, they would request some or all of the underlying transaction documents to carry out their due diligence. Which particular transaction documents investors want to scrutinise differs among transactions and investors can normally identify the existing set of transaction documents by referring to the prospectus. Further feedback, by no means unanimous, suggested that the current list of documents is not helpful and that, instead, there should be a requirement that all relevant transaction documents be provided to investors upon request as well as the offering document or prospectus.
- 4.81** Regarding private securitisations, we were told by some market participants that such transactions are normally based on a term sheet which provides the basis for the negotiation of the transaction documents and that it would be typical for investors in a private securitisation to be provided with the term sheet and all the transaction documents, since investors in such transactions are normally parties to the negotiation and agreements.
- 4.82** Access to relevant documents is clearly essential for investors and it is not our intention to reduce the information available to investors. Our intention is to simplify and clarify the current requirement as much as possible and make it relevant for all securitisations,

whether public or private. Accordingly, we propose to remove the list of documents in sub-paragraphs (b) to (g) of SECN 6.2.1R(2) and instead require the provision of an offering document, prospectus or termsheet together with all of the transaction documents (excluding legal opinions). These documents should be provided to holders of securitisation positions and upon request to potential investors and regulators. For public securitisations, we would no longer require these documents to be provided by means of a securitisation repository.

- 4.83** Industry feedback also suggested that the current timeframe for provision of final transaction documents after closing may be unnecessarily stringent at 15 days after closing of the transaction. It was suggested to us that 30 days after closing or by the first scheduled interest payment date on the transaction would be sufficient. Accordingly, we are proposing a change to SECN 6.2.2R(2) to lengthen the time allowed from 15 days after closing to the earlier of 30 days after closing or the first scheduled interest payment date on the transaction.
- 4.84** SECN 6.2.1R(3) requires that a transaction summary be provided for securitisations where a prospectus is not required to be drawn up.
- 4.85** Industry feedback suggests that transaction summaries are not useful for investors, because in the absence of a prospectus, an investor will undertake a review of the transaction documents or may even be a party involved in negotiating and agreeing such documents.
- 4.86** In line with our objective to remove unnecessary burden, we propose to remove the requirement to provide a transaction summary by deleting SECN 6.2.1R(3).
- 4.87** We note several references in SECN 5 to a transaction summary as a document in which risk retention could be disclosed in the absence of a final offering document or prospectus. We propose to replace 'transaction summary or overview of the main features of the securitisation' with 'or other transaction documentation' for each of these references. In addition, we propose to insert a new sub-paragraph in SECN 6.2.1R(2) referring to a 'disclosure in relation to risk retention requirements'.

**Question 24: Do you agree with our proposed changes to SECN 6.2.1R(2) which require the provision of all transaction documents as well as the offering circular, prospectus or term sheet? Please elaborate on your response.**

**Question 25: Do you agree with the deletion of the list of documents in sub-paragraphs (b) to (g) of SECN 6.2.1R(2)? Please elaborate on your response and indicate which documents are critical in order to reach an investment decision prior to investing in a securitisation.**

**Question 26: Do you agree with our proposal regarding the timing to provide the final documents in SECN 6.2.2R(2)? Please elaborate on your response.**

**Question 27: Do you agree with our proposal to remove the requirement to make a transaction summary available as per SECN 6.2.1R(3)? Please elaborate on your response and explain the circumstances in which the transaction summary is useful.**

**Question 28: Do you agree with the changes we propose to SECN 5 and SECN 6.2.1R(2) regarding disclosure of risk retention as a result of the proposed removal of the requirement to provide a transaction summary? Please elaborate on your response.**

## Notifications of private securitisations to the FCA and PRA

- 4.88** Manufacturers of private securitisations are currently required to submit notifications of their securitisations to the FCA or the PRA under Direction by the FCA and PRA. We intend to retain this requirement but move it from a Direction to a rule in SECN 6. For purposes of determining which transactions will need to be notified, we are proposing to retain the existing distinction in treatment between public and private, and therefore require notifications of those securitisations that are not required to provide a UK prospectus under the rules in PRM.
- 4.89** Separately, we note that the new prospectus rules which came into force in January 2026 have made consequential changes to SECN to update references to the UK prospectus regime, so that references to a prospectus being required (or not) by 'section 85 of the Act (Contravention of prohibition relating to public offer of securities) and drawn up pursuant to rules made by the FCA for the purposes of Part 6 of the Act (official listing)' have changed to 'the rules in PRM'.
- 4.90** We plan to make some minor changes to the contents of the private notification templates:
- In field SECPR13 of the proposed SECN 6 Annex 1R for Non-ABCP securitisations, we propose two new types of underlying exposures classification for (i) corporate underlying exposures of CLOs and for (ii) MGS or similar private schemes. These additional classification types are intended to make it easier to distinguish these securitisations from others. In addition, we have noted that the notification of MGS and similar private schemes should be on an aggregated annual basis as per the footnote to Annex A of SECN 6 Annex 1R.
  - Amendment of the field description for SECPR14 of the proposed SECN 6 Annexes 1R, 2R and 3R to clarify that where transactions are issued in multiple currencies, a single aggregated notional value should be recorded.
  - Insertion of three new data fields to record the original expected weighted average life (WAL) of the underlying exposures, to flag resecuritisations and to distinguish between traditional and synthetic Non-ABCP securitisations. The former two are included in the proposed SECN 6 Annexes 1R, 2R and 3R, while the latter is only included in the proposed SECN 6 Annex 1R.

- 4.91** At the same time, we propose to relax the timing of the main notification deadline to be within one week after the issuance of the securities or creation of the securitisation positions, instead of requiring the notification to be submitted before pricing or commitment to invest. We believe this is a more proportionate approach.
- 4.92** Finally, we propose that the notification method will continue to be by email. We propose that, subject to PRA proposals, all private notifications, whether originating with a PRA or an FCA regulated originator, will now have to be submitted to the FCA and no longer to the PRA.
- 4.93** The submission of private securitisation notifications for all transactions in scope may be an area of supervisory focus for the FCA in future as a means to monitor developments in the private securitisation market. In the past we have seen variable quality of reporting and we may take a more stringent approach in future to ensure that the data we receive is accurate and complete.

**Question 29: Do you disagree with any of the changes we propose for private notifications? Please elaborate on your response.**

## Frequency of reporting and long first interest periods

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- 4.94** Market participants have sought clarity on the frequency of provision of information for transactions which have a long first interest period.
- 4.95** In response, we propose to insert a new provision SECN 6.2.2R(3) to clarify that the first reporting of the information referred to therein should be made available at the latest one month after the due date for the first interest payment date of the relevant securitisation.

**Question 30: Do you agree with our proposal to clarify the frequency of reporting for securitisations with a long first interest period? Please elaborate on your response.**

## Our approach to confidentiality and data protection

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- 4.96** SECN 6.2.5R permits the information required under transparency requirements to be provided in anonymised or aggregated form or as a summary of documentation in order to comply with UK confidentiality and data protection laws.
- 4.97** In response to CP23/17, we were asked to reconsider the interaction between contractual confidentiality and our transparency rules. We also received suggestions that the current approach to confidentiality and data protection should be extended to cater not just for UK law, but also relevant laws applicable in other jurisdictions.

- 4.98** We are not inclined to make changes to our rules to allow for carve-outs based on contractual confidentiality because we consider this could result in less information being provided to investors without sufficient justification.
- 4.99** However, we might consider recognition of relevant laws applicable in other jurisdictions (beyond the UK), in order to facilitate the issuance of cross-border securitisations to which the laws of other jurisdictions may apply. We would like to understand whether this still remains a concern, given all the changes we already propose in this paper.
- 4.100** To understand if any further change is justified, we request examples of issues which may still exist despite the other changes proposed in this paper regarding the current formulation of SECN 6.2.5R.

**Question 31:** **In light of the proposals set out in this paper, does the current formulation of SECN 6.2.5R create barriers to the issuance of securitisations by limiting its application to confidentiality and data protection laws which apply in the UK only? Please elaborate on your response and provide relevant examples.**

**Question 32:** **If you disagree with our proposals on the transparency requirements, how could we change them?**

## Chapter 5

# STS Notifications

### Publication of STS Notifications

- 5.1** The UK SR 2024 requires the FCA to maintain a list of securitisations notified to the FCA as meeting UK STS criteria. SECN 2.6.1R sets out the information which must be included in STS notifications and which information from the STS notifications is to be published by the FCA. This requirement differs between securitisations for which a prospectus is required by the FCA rules in PRM (the public securitisations) and those for which it is not (the private securitisations). For the former, the FCA publishes the full details of the STS notification, while for the latter an anonymised version is published.
- 5.2** Feedback from manufacturers suggested that the current rules result in anonymised STS notifications being published for some securitisations which are private, but public in substance, and for which their manufacturers would have welcomed the flexibility to choose that the full details of their STS notification be published.
- 5.3** In response, we propose to retain for this purpose the distinction between public (defined as requiring a UK prospectus under the rules in PRM) and private securitisations, but to propose changes to SECN 2.6.1R so that the originator or sponsor of a private securitisation can decide whether the full details of the STS notification are published on the FCA's STS list or not. If the originator or sponsor prefers that the full details are published they may submit the public STS notification template. Alternatively, if the originator or sponsor does not want the full details of a private securitisation to be published, they have the option to submit the private full template and the private anonymised STS notification template, the latter of which will be published instead of the full details.
- 5.4** An alternative proposal could be to offer this choice for all securitisations which would avoid different treatment of public and private securitisations. However, this would raise the risk that STS notifications would be published on an anonymised basis even for securitisations which we currently consider to be public. Nonetheless, we believe this risk may be low because we would expect manufacturers to be incentivised to promote the STS information for their transactions.
- 5.5** Our intention is that investors will have greater transparency, where appropriate, as to which securitisations are on the STS list and their details.

**Question 33: Do you agree with our proposal to give originators and sponsors flexibility to decide whether the full details or anonymised version of STS notifications should be published for private securitisations? Please elaborate on your response.**

**Question 34: Do you think the alternative proposal is preferable to our proposal? Please elaborate on your response.**

## Chapter 6

### Resecuritisation

- 6.1** The current securitisation rules, as outlined in SECN 7, impose a ban on resecuritisation unless the FCA, or the PRA as the case may be, have agreed to it. This is subject to transitional provisions for pre-2019 resecuritisations. The ban applies to both UK manufacturers manufacturing a resecuritisation and UK institutional investors investing in a resecuritisation.
- 6.2** The resecuritisation ban aims to address the complexity and opacity of resecuritisation as observed during the GFC. FCA institutional investors are currently required to request a waiver if they want to invest in any resecuritisation except those allowed by our rules (SECN 7.2.2 R and SECN Sch 6).
- 6.3** However, the PRA and the FCA acknowledge that a broad ban on resecuritisation inadvertently restricts manufacturers from undertaking specific resecuritisation where the product design and nature of the underlying does not pose the same level of risks.
- 6.4** Accordingly, in its consultation, the PRA sets out proposals to exempt, subject to a number of conditions, two specific types of resecuritisation structures from the ban. For the avoidance of doubt, FCA institutional investors would be allowed to invest in those types of resecuritisation without expressly requesting a waiver from the FCA.
- 6.5** The two specific types of resecuritisations proposed to be exempted are:
- The securitisation of securitisation positions which are constituted by one exposure and its related credit protection. An example of such securitisation positions is the loans underwritten under MGS; and
  - The securitisation of the senior most securitisation positions.
- 6.6** As outlined above, we are proposing to allow the resecuritisation of exposures that benefit on an individual level from the credit protection, such as under the MGS. We also welcome views on whether it would be desirable to provide this exemption on a broader basis.
- 6.7** These proposed exemptions will be subject to a number of safeguards discussed in more detail in the PRA consultation document, including that these securitisations cannot qualify as STS.
- 6.8** Importantly, it is proposed that the exemptions listed above will only be allowed to the extent that the originator and sponsor of the resecuritisation are PRA authorised persons. There are no corresponding proposals for FCA regulated manufacturers. However, institutional investors subject to SECN will be able to invest in these products.

- 6.9** We're also clarifying that retranching of contiguous issued tranches into one or a fewer number of tranches shall not constitute a resecuritisation. This clarification was previously in the risk retention part of SECN (at SECN 5.17.1(4)), but we have restated it and moved it to the resecuritisation part where we consider it is more appropriately located (at SECN 7.2.3R).
- 6.10** The changes proposed to our Handbook can be found at SECN 7.2. These align with the changes proposed to the PRA rules.

**Question 35: Do you agree with our proposals to allow FCA regulated institutional investors to invest in these types of resecuritisations? Please elaborate on your response.**

## Chapter 7

# Credit Granting

- 7.1** The credit granting requirements, set out in SECN 8, are an important policy measure introduced after the GFC. The credit granting requirements stipulate underwriting standards for exposures to be securitised.
- 7.2** The purpose of these rules is to mitigate moral hazard and the repeat of 'originate to distribute' practices that would otherwise lead to exposures being underwritten for the sole purpose of being securitised.
- 7.3** We consider, however, that the current wording of these rules is not sufficiently clear and may affect uniformity of interpretation and, accordingly, a harmonised implementation.
- 7.4** In order to enhance regulatory clarity, we propose to:
- Clarify that sound and well-defined criteria for credit granting must apply to any exposure to be securitised, irrespective of whether other non-securitised exposures exist.
  - Replace the term 'non-securitised exposures' in SECN 8.2 with a simpler and clearer reference to the 'comparable assets remaining on the [firm's] balance sheet, if any'.
  - Clarify that, all other things being equal (i.e., product type, target clients etc), firms cannot apply to securitised exposures 'less stringent' underwriting criteria than those applicable to comparable assets remaining on the balance sheet, if any. This aims to ensure that firms do not apply less stringent standards depending on whether they intend to securitise the exposures they originate or not.
- 7.5** The FCA considers that these changes will provide greater clarity and certainty to manufacturers and the broader market regarding the minimum underwriting quality of loans that are to be securitised. The FCA expects this to contribute to the quality and resilience of the securitised loans, serving the interests of both manufacturers and investors.
- 7.6** The relevant changes are to be found in SECN 8.2. These align with the changes proposed to the PRA rules.

**Question 36:** **Do you agree with our proposals to clarify the rules surrounding credit granting in SECN 8.2? Please elaborate on your response and what alternatives should we consider?**

## Chapter 8

# L-Shaped Risk Retention

- 8.1** Risk retention rules aim to align the incentives between securitisation manufacturers and investors by requiring the former to retain a degree of exposure to the risk in the securitisation.
- 8.2** Currently, the UK securitisation rules stipulate five manners of risk retention as eligible, as outlined in SECN 5.2.8 R. However, the rules do not permit an L-shaped manner of risk retention. L-shaped risk retention is commonly understood as manufacturers retaining a certain percentage of the first loss tranche, with the residual risk retained by holding the remaining tranches in equal proportion.
- 8.3** We consider that permitting L-shaped risk retention could provide manufacturers with additional flexibility by making it easier to issue in overseas markets where the investors are more likely to be familiar with this modality of risk retention.
- 8.4** Under the proposal, the L-shaped combined horizontal (first loss tranche) and vertical (equal proportion in remaining tranches) element must amount to a minimum of 5% of the nominal value of the securitised exposures. In case of multiple holding retainers, each retainer should retain the net interest in the securitisation on a pro rata basis and in the same proportion.
- 8.5** The relevant changes are to be found in SECN 5.2, SECN 5.3, SECN 5.4 and SECN 5.9A.

**Question 37: Do you agree with the proposal to allow L-shaped risk retention as an eligible form of risk retention? Please elaborate on your response.**

## Chapter 9

# Implementation

- 9.1** This chapter explains our proposed approach to implementation and transition to the new framework should we proceed with the proposals discussed in this paper.
- 9.2** In designing our approach to implementation of and transition to the proposed SECN regime, we seek to achieve a smooth process that would ensure sufficient time for:
- market participants to familiarise themselves with the new rules,
  - manufacturers to adjust to producing information in new formats and making it available by different means, when applicable,
  - investors to adjust to accessing data differently and in processing data in new formats, and,
  - for securitisation repositories to make adjustments to their systems, processes and services.
- 9.3** Furthermore, we recognise that there are UK manufacturers who market to EU investors and will therefore need to provide the information that EU institutional investors require under EU rules. To avoid placing a more complex and costly reporting burden on such manufacturers, we propose to introduce some flexibility in the transparency requirements by introducing a mechanism whereby a UK manufacturer's compliance with EU rules would be deemed sufficient to satisfy UK requirements.

## Delayed entry into force

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- 9.4** In order to provide some additional time for market participants to prepare for the proposed changes to the securitisation rules, we propose that the new requirements would not enter into force until six months after the making of the new rules.
- 9.5** We have not included any transitional provisions because of this proposed delay which we consider to be sufficient time for market participants to make preparations for entry into force of the new rules.

**Question 38:** **Is the proposed period of 6 months between publication of the final SECN instrument and the new requirements coming into force reasonable, assuming we proceed broadly as proposed? Please elaborate on your response.**

## Acceptance of EU underlying exposures templates for certain asset classes

- 9.6** We want to avoid friction and unnecessary costs for manufacturers who market their securitisations to EU investors.
- 9.7** Given that the core information content is similar in most of the underlying exposure templates which apply in the UK and in the EU, even though the design and format of the templates differ, we propose to allow UK manufacturers to satisfy our requirements by providing underlying exposures information in the corresponding EU underlying exposure template. This would be instead of the proposed new SECN 11 underlying exposure templates for the asset classes for which we propose to continue to require specified templates, namely Residential Real Estate (Annex 2), Automobile (Annex 5), Consumer (Annex 6) and Leasing exposures (Annex 8). The EU add-on template for non-performing exposures would also be accepted instead of the proposed new SECN 11 Non-performing exposures add-on (Annex 10).
- 9.8** However, for CLOs, we would require manufacturers to provide underlying exposures information in the proposed new SECN 11 Annex 4A template. This means CLO manufacturers may need to also continue to produce a corporate underlying exposures template to satisfy EU requirements if also required under EU regulation. In our view, SECN 11 Annex 4A is more suited to the CLO market than the equivalent template for corporate underlying exposures under EU rules.
- 9.9** We would require that the above-mentioned underlying exposure templates be made available as appropriate for all securitisations regardless of any categorisation as public or private securitisations.
- 9.10** Should manufacturers choose to provide underlying exposures information in one of the EU underlying exposure templates, we would not require the information to be provided in XML format, nor would we require submission of the template to a securitisation repository. Instead, the information should be made available in a way which is accessible to investors and potential investors as appropriate and meets the requirements of the proposed new wording of SECN 6.3.4R.
- 9.11** The versions of the EU underlying exposures templates which we propose to accept as satisfying our rules, are those required by Commission Delegated Regulation (EU) 2020/1224 and 2020/1225 as in force on 16 February 2026. We are aware that these are under review by EU Authorities and are likely to be adjusted in the next few years. This may result in a deviation between the new EU requirements and the templates which the FCA proposes to accept pursuant to these proposals. When this occurs, the FCA will consider whether it needs to adjust its approach.

**Question 39: Do you agree with the proposal to allow use of the current EU underlying exposure templates for certain asset classes instead of the new SECN 11 underlying exposure templates? Please elaborate on your response.**

## Guidance regarding the provision of underlying exposures information in the proposed new SECN 11 Annex 2 for residential real estate

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- 9.12** For those securitisations which are pre-positioned or used as collateral with the Bank of England, it is necessary to submit loan-level data in the Bank of England loan-level templates. It is our understanding that the majority of such securitisations comprise residential real estate exposures.
- 9.13** We recognise that the Bank of England residential mortgages / RMBS loan level data template contains the majority, but not all, of the information required in the proposed SECN 11 Annex 2 Underlying exposures template for residential real estate.
- 9.14** In an effort to streamline the reporting requirements for such securitisations, we propose to introduce guidance in SECN 11.3.8G which allows a reporting entity to choose to use the Bank of England residential mortgages/ RMBS loan level data template as a format for making available the information required by SECN 11 Annex 2 as long as it provides alongside that template (within the same file, on an additional tab) any information required by SECN 11 Annex 2 which is not included in that template.
- 9.15** For example, the information specified in fields AR237SECN to AR246SECN of SECN 11 Annex 2, to be shown alongside the Pool Cut-off Date (field number AR1) and Loan Identifier (field number AR3).
- 9.16** We have indicated in the guidance the additional fields not included in that template at the time of this consultation but required by the proposed new SECN 11 Annex 2. However, the Bank of England template may change and the FCA will not be monitoring it for updates, so it is the responsibility of the reporting entity to ensure that it has disclosed the required information.

**Question 40: Do you agree with the proposed guidance introduced in SECN 11.3.8G regarding the provision of underlying exposures information in the proposed new SECN 11 Annex 2 for residential real estate? Please elaborate on your response.**

## Chapter 10

# Discussion chapter: Scope of Securitisation Rules

- 10.1** The definition of securitisation is widely considered to be broad. Given market evolution since its introduction, certain stakeholders now argue that it may be capturing transactions where the benefits flowing from the application of the SECN conduct rules (and equivalent PRA provisions) are either unclear or, some argue, do not justify the costs.
- 10.2** Given the experience gained by market participants and the regulator with the securitisation framework, we want to assess whether the scope of what is caught by the rules remains appropriate.
- 10.3** In the context of this chapter, we are not intending to promote a discussion on the definition of "securitisation" itself. This definition flows from the Basel framework and benefits from years of market and legal experience underpinning it.
- 10.4** Instead, as set out below, we would welcome feedback on various types of securitisations to better understand the desirability of introducing exemptions from the application of some (or all) of the conduct rules in an appropriate manner that introduces further proportionality without increasing regulatory or legal uncertainty.

## The types of securitisations under consideration

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- 10.5** Earlier in this paper, we proposed material changes to the securitisation conduct framework. Should we finalise our proposals broadly as consulted, our rules would continue to apply broadly to the same types of transactions.
- 10.6** We want to understand whether these rules, which primarily aim to minimise the information asymmetry and misalignment of interests between manufacturers and investors, remain relevant in all cases.
- 10.7** We have received feedback that for certain structures and activities, some of those risks of harm may either not be material or may already be addressed through other regulatory provisions or market practice.
- 10.8** Specifically, when it comes to the application of the conduct rules, we solicit feedback on the following types of securitisations:
- CLOs
  - Whole Business Securitisations (WBS)
  - Correlation Trading Portfolios (CTP)

## Discussion on specific securitisations

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### CLOs

- 10.9** In a typical CLO structure, a CLO manager uses the funds raised from investors to purchase syndicated leveraged loans from the primary and secondary market through a special purpose vehicle (SPV). The investors holding notes issued by the SPV receive principal and interest payouts from the underlying leveraged loans. The CLO typically involves active management of the underlying portfolio until the end of the reinvestment period (usually 4.5-5 years), after which the transaction turns into an amortising structure.
- 10.10** The CLO manager typically receives management fees (senior and subordinated), performance fees and upside from holding equity/subordinated tranches (as relevant). CLO investors usually predefine eligibility criteria for the types of loans that can be included, and CLOs include several performance tests such as Over collateralisation (OC), Interest Coverage (IC), CCC bucket tests, Weighted Average Life (WAL) and Weighted Average Spread (WAS).
- 10.11** Several of those who provided feedback to us argued that structuring and managing CLOs, while undoubtably falling in the definition of securitisation, share a number of characteristics with the asset management business. This, they said, should prompt a reconsideration of whether the securitisation conduct rules should apply, in whole or in part, to CLOs.
- 10.12** These stakeholders further noted that CLO managers are typically, but not always, Alternative Investment Fund Managers (AIFMs) and usually subject to the applicable risk management and due diligence rules. Accordingly, some argue that the additional securitisation product-specific requirements, including risk retention provisions, can be disproportionate, and not aligned to provisions for other investment management products.
- 10.13** Market participants have articulated views and prompted debate as follows:
- They argue that alignment of interest between CLO managers and their investors can be achieved through mechanisms other than risk retention. Some of these mechanisms are integral to the asset management business (e.g., CLO managers are selected based on a variety of criteria including their track record). Others are inherent to the structure of the CLO, including the performance fees paid to the manager.
  - They also argue that compliance with the 5% risk retention provisions is often achieved through complex structures, whose ability to strengthen alignment of interest is not always clear. Detractors of the current approach argue that the existing arrangements increase compliance risk, regulatory uncertainty and the complexity of the product without necessarily achieving the policy objectives these arrangements were introduced to attain.
  - A number of buy-side firms view managing CLOs as akin to other money management activities. They argue that securitisation regulation duplicates rules

already applicable to them as regulated firms owe specific duties to their clients. These stakeholders have also sometimes argued that these conduct rules make UK managers less competitive. They compare and contrast the regulatory treatment of securitised structures to that applicable to other products that do not attract the same requirements.

- 10.14** Some in the industry question whether the existing mechanisms to align the interest of the originators of the leveraged loans, i.e., the banks syndicating the loans (typically on a firm commitment basis) with that of the ultimate investors in the CLOs are effective. Some consider that credit granting standards and the risk of a 'hung transaction', where the bank has to retain on their books the loans they are unable to sell, are sufficient to promote adequate underwriting standards. However, others view these mechanisms as insufficient checks on the quality of loan origination especially when there is elevated demand in credit markets.
- 10.15** Finally, some question whether CLOs of broadly syndicated loans warrant a different treatment in relation to the alignment of interest or credit granting criteria than CLOs of private credits (broadly defined as direct lending).
- 10.16** We have not found the feedback above strong enough to warrant a change of the rules at this stage, but we are interested in receiving data-led arguments which could strengthen the feedback. We are also keen to receive feedback from investors in CLOs of broadly syndicated loans or CLOs of private loans as to how much reliance they place on the risk retention and credit granting rules as part of their assessment of the risk associated with the securitisation.

**Question 41:** **Do you have any views on the application of specific conduct rules (e.g., risk retention, credit granting standards) in regulating CLOs? What possible improvements, if any, do you consider could be made to address some of the concerns and criticisms articulated above?**

## Whole Business Securitisation

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- 10.17** In broad terms, WBS are securitisations where the cash-generating assets of an enterprise are put into an SPV and a priority structure around the distribution of the cash flows from the operating revenue is devised. This arrangement typically offers investors better credit terms and protection.
- 10.18** Such structures are considered favourable for franchisee models or businesses with high cash operating revenues. Unlike a typical securitisation where the exposure pool is granular and the credit risk is diversified among borrowers, in WBSs, the risk is with a single counterparty, i.e., with its underlying business model and assets (royalty, franchisee, partnerships, etc.). Some participants in the market view WBS structures as closer to leveraged loans than securitisations.

- 10.19** We have received feedback that, when it comes to WBS, the concerns around investors' ability to model risk, information asymmetry, lack of alignment of interest and lack of bargaining power should be less acute. This builds upon feedback that institutional investors are typically closely involved with the issuer and are knowledgeable about the enterprise. Accordingly, stakeholders argue these structures should attract less stringent and more proportionate application of the conduct rules of the securitisation framework.
- 10.20** Further, the securitisation rules envisage 5% risk retention by the entity most suitable to do so among the originator, original lender or sponsor. However, for WBS, often no entity ideally fits the bill. The entity most aligned with the performance of the exposure in WBS is the borrower, and them retaining 5% would effectively mean borrowing 5% less. Hence, the risk retention requirement is perceived as imposing unwarranted complications and costs on these structures.

**Question 42:** **Do you have any views on the proportionality of applying the securitisation conduct rules to WBS? Please elaborate on your response.**

**Question 43:** **Do you consider that these kinds of structures should be exempt wholly or partially (e.g., as regards risk retention, transparency etc.) from some of those requirements? Please elaborate on your response.**

## Correlation Trading Portfolio

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- 10.21** Correlation trading portfolios (CTPs) are commonly understood and used as derivative transactions but are classified as securitisations. Accordingly, they need to comply with securitisation conduct requirements (except risk retention requirements).
- 10.22** Some market participants have shared their view that CTPs are a trading and risk management product rather than a securitisation transaction. The feedback argues that the classification of CTPs as securitisation due to risk tranching and other characteristics does not reflect the risks arising from this product or market practice around it.
- 10.23** Their feedback also notes that the pre-2019 securitisation framework had contemplated a different treatment for CTPs. At the time, for example, the due diligence requirements for institutional investors investing in CTPs were deemed to have been met if certain conditions were satisfied. However, the post-2019 securitisation framework did not maintain this more favourable treatment.
- 10.24** The feedback we received notes that fulfilling some of the conduct requirements for CTPs including credit granting, due diligence, and transparency is not always tenable or rational. For example, these securitisation positions do not entail granting credit, and, as these are publicly traded indices, there is little question of information asymmetry between the originator and the investor.

- Question 44:** Do you have views on the application of the conduct requirements under the securitisation framework to CTPs? Please elaborate on your response.
- Question 45:** For the securitisations discussed in this chapter, are there any other important factors that should be considered while examining the desirability of exemptions from specific conduct related SECN provisions? Please elaborate on your response.
- Question 46:** In the broader context of the discussion in this chapter, are there any other types of securitisations that should also be considered? Please elaborate on your response and explain what kinds of exemptions would streamline compliance responsibilities without compromising the soundness of the securitisation framework?

## Annex 1

# Questions in this paper

- Question 1:** Do you agree with our proposals and their focus on ensuring that institutional investors obtain sufficient information from the manufacturer of the securitisation? Please elaborate on your response.
- Question 2:** Do you agree with the proposal to remove the table at SECN 4.2.1 R (1)(e) and the addition of corresponding guidance? Please elaborate on your response.
- Question 3:** Do you agree with our proposals to require institutional investors to form their own view on the robustness of the credit granting processes without prescribing how this should be done? Please elaborate on your response.
- Question 4:** Do you agree with our proposal to replace the requirement for institutional investors to verify manufacturers' compliance with the 5% risk retention rule with a requirement that the investor satisfy itself that a mechanism exists that aligns their commercial interest to that of the manufacturer of the securitisation? Please elaborate on your response.
- Question 5:** Do you agree with our proposed guidance in SECN 4.2.1B G on how such alignment can be achieved? Please elaborate on your response.
- Question 6:** Do you agree with our proposal to no longer prescribe the list of structural features investors are required to assess and to simplify due diligence requirements for STS securitisations? Please elaborate on your response.
- Question 7:** Do you agree with our proposal to remove the prescriptive elements in the due diligence requirements whilst holding a securitisation position? Please elaborate on your response.
- Question 8:** Do you agree with our proposal to move to a more principles-based approach for disclosure of underlying exposures for certain asset classes and delete SECN

**11 and 12 Annexes 3, 4, 7 and 9? Please elaborate on your response.**

- Question 9:** **Do you agree with our proposed changes to SECN 11.3? Please elaborate on your response.**
- Question 10:** **Do you agree with our proposal to replace the underlying exposures template for ABCP (SECN 11 and 12 Annex 11) with a more principles-based set of requirements as set out in SECN 6.2.1R(1)(b)? Please elaborate on your response.**
- Question 11:** **Do you agree with our proposal to replace the investor report and inside information or significant event templates (SECN 11 and 12 Annexes 12, 13, 14 and 15) with more principles-based requirements? Please elaborate on your response.**
- Question 12:** **Do you agree with our proposals to (i) stop requiring that transparency templates be made available in XML and (ii) no longer impose a uniform file format? Please elaborate on your response.**
- Question 13:** **Do you agree with our proposals as regards the format in which the various data fields within the retained templates are to be populated? Please elaborate on your response.**
- Question 14:** **Do you agree that provision of underlying exposure information in the proposed amended SECN 11 templates is not useful in the case of a securitisation with a single underlying exposure? Please elaborate on your response.**
- Question 15:** **Do you agree with our proposal to retain underlying exposures templates for Residential Real Estate, Automobile, Consumer, Leasing and Non-performing exposures? Please elaborate on your response.**
- Question 16:** **Do you agree with our proposal to align the retained templates to the Bank of England loan level data templates? Please elaborate on your response.**
- Question 17:** **Do you have any comments on the new templates for SECN 11 Annex 2 (Residential Real Estate), Annex 5 (Automobile), Annex 6 (Consumer), Annex 8 (Leasing) or Annex 10 (Non-performing exposures), for example on the fields included or excluded, the order of the fields or the inclusion of blank fields? Please elaborate on your response.**

- Question 18:** Do you agree that this proposed new template SECN 11 Annex 4A is better suited to CLOs than the current one in SECN 11 and 12 Annex 4? Please elaborate on your response.
- Question 19:** Do you have any comments on the proposed fields included in (or excluded from) the proposed new SECN 11 Annex 4A for CLOs? Please elaborate on your response.
- Question 20:** Should the requirement to complete SECN 11 Annex 4A apply during the warehouse phase of a CLO? Please elaborate on your response.
- Question 21:** Do you think that some significant information will be lost by making this simplification to the no data rules as they apply to completion of underlying exposure templates? Please elaborate on your response.
- Question 22:** Do you agree with our proposal to remove the distinction in treatment between public and private securitisations regarding the majority of the transparency requirements? Please elaborate on your response.
- Question 23:** Do you agree with the removal of the requirement for information to be reported to securitisation repositories? Please elaborate on your response.
- Question 24:** Do you agree with our proposed changes to SECN 6.2.1R(2) which require the provision of all transaction documents as well as the offering circular, prospectus or term sheet? Please elaborate on your response.
- Question 25:** Do you agree with the deletion of the list of documents in sub-paragraphs (b) to (g) of SECN 6.2.1R(2)? Please elaborate on your response and indicate which documents are critical in order to reach an investment decision prior to investing in a securitisation.
- Question 26:** Do you agree with our proposal regarding the timing to provide the final documents in SECN 6.2.2R(2)? Please elaborate on your response.
- Question 27:** Do you agree with our proposal to remove the requirement to make a transaction summary available as per SECN 6.2.1R(3)? Please elaborate on your response and explain the circumstances in which the transaction summary is useful.

- Question 28:** Do you agree with the changes we propose to SECN 5 and SECN 6.2.1R(2) regarding disclosure of risk retention as a result of the proposed removal of the requirement to provide a transaction summary? Please elaborate on your response.
- Question 29:** Do you disagree with any of the changes we propose for private notifications? Please elaborate on your response.
- Question 30:** Do you agree with our proposal to clarify the frequency of reporting for securitisations with a long first interest period? Please elaborate on your response.
- Question 31:** In light of the proposals set out in this paper, does the current formulation of SECN 6.2.5R create barriers to the issuance of securitisations by limiting its application to confidentiality and data protection laws which apply in the UK only? Please elaborate on your response and provide relevant examples.
- Question 32:** If you disagree with our proposals on the transparency requirements, how could we change them? Please elaborate on your response.
- Question 33:** Do you agree with our proposal to give originators and sponsors flexibility to decide whether the full details or anonymised version of STS notifications should be published for private securitisations? Please elaborate on your response.
- Question 34:** Do you think the alternative proposal is preferable to our proposal? Please elaborate on your response.
- Question 35:** Do you agree with our proposals to allow FCA regulated institutional investors to invest in these types of resecuritisations? Please elaborate on your response.
- Question 36:** Do you agree with our proposals to clarify the rules surrounding credit granting in SECN 8.2? Please elaborate on your response and what alternatives should we consider?
- Question 37:** Do you agree with the proposal to allow L-shaped risk retention as an eligible form of risk retention? Please elaborate on your response.
- Question 38:** Is the proposed period of 6 months between publication of the final SECN instrument and the new requirements coming into force reasonable, assuming we proceed broadly as proposed? Please elaborate on your response.

- Question 39:** Do you agree with the proposal to allow use of the current EU underlying exposure templates for certain asset classes instead of the new SECN 11 underlying exposure templates? Please elaborate on your response.
- Question 40:** Do you agree with the proposed guidance introduced in SECN 11.3.8G regarding the provision of underlying exposures information in the proposed new SECN 11 Annex 2 for residential real estate? Please elaborate on your response.
- Question 41:** Do you have any views on the application of specific conduct rules (e.g. risk retention, credit granting standards) in regulating CLOs? What possible improvements, if any, do you consider could be made to address some of the concerns and criticisms articulated above? Please elaborate on your response.
- Question 42:** Do you have any views on the proportionality of applying the securitisation conduct rules to WBS? Please elaborate on your response.
- Question 43:** Do you consider that these kinds of structures should be exempt wholly or partially (e.g., as regards risk retention, transparency etc.) from some of those requirements? Please elaborate on your response.
- Question 44:** Do you have views on the application of the conduct requirements under the securitisation framework to CTPs? Please elaborate on your response.
- Question 45:** For the securitisations discussed in this chapter, are there any other important factors that should be considered while examining the desirability of exemptions from specific conduct related SECN provisions? Please elaborate on your response.
- Question 46:** In the broader context of the discussion in this chapter, are there any other types of securitisations that should also be considered? Please elaborate on your response and explain what kinds of exemptions would streamline compliance responsibilities without compromising the soundness of the securitisation framework?
- Question 47:** Do you have any comments on our cost benefit analysis? Please elaborate on your response.

## Annex 2

# Cost Benefit Analysis (CBA)

## Executive Summary

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1. This cost benefit analysis (CBA) assesses the impact of our proposed changes to the Securitisation Sourcebook (SECN). Securitisation enables lenders to transform illiquid assets into tradable securities, thereby enhancing liquidity, distributing risk, and supporting lending and investment in the real economy. Despite its importance, the UK securitisation market has remained subdued since the Global Financial Crisis (GFC), due in part to the regulatory framework for securitisation.
2. The EU Securitisation Regulation (Regulation (EU) 2017/2402) (EU SR) was introduced to restore investor confidence in the sector ([ESMA, 2015](#)). The [2015 European Commission Impact Assessment](#) noted that trust in the European market was undermined by events that took place in U.S. markets. This resulted in low demand for securitisation products.
3. The EU SR came into effect in January 2019 and was incorporated into UK law at the end of the Brexit transition period on 31 December 2020. The UK SR 2024 replaced the assimilated EU law.
4. The EU and UK Securitisation frameworks established a comprehensive transparency regime with new obligations on manufacturers of securitisations to provide investors with detailed information about their transaction. Today, enhanced transparency rules remain a cornerstone of the regulation. However, the level of prescriptiveness and rigidity in these rules has resulted in excessive costs for manufacturers, with limited value for investors. Similarly, the EU and UK frameworks established an obligation for UK institutional investors to conduct due diligence prior to investing and while holding a securitisation. Here again, the rigid due diligence requirements in the rules may have caused investors to prioritise procedural compliance over substantively evaluating their risks. These features of the framework among others may have contributed to the subdued volume of securitisation activity and consequently, diminishing lending in the real economy, impeding risk transfer for originators, and diverting activity to other markets.
5. Our proposals aim to rebalance the regulatory framework, reducing unnecessary burdens while maintaining robust standards for transparency and risk management. They cover:
  - **Transparency:** streamline disclosure requirements for all transactions by removing the distinction in treatment between public and private securitisations, standardised templates retained only for more mature and standardised asset classes, and principles-based disclosure regime for others.

- Subject to the making of a Statutory Instrument (SI), cease requiring manufacturers to report information to regulated securitisation repositories (SRs).
- **Due diligence:** shift requirements to a more principles-based framework, with investors assessing whether a securitisation fits their risk appetite and mandate.
- **Resecuritisation:** maintain the ban while introducing narrow exemptions.
- **Risk retention:** allow an additional L-shaped risk retention modality.
- **Credit granting:** clarify credit-granting requirements without changing policy.

**6.** Manufacturers will benefit from reduced compliance costs, particularly from simplifying reporting templates and ceasing to require reporting to regulated SRs. Insofar as the current rules inadvertently lead to formulaic due diligence, the proposals may reduce due diligence costs for investors, lowering barriers to entry, enabling broader participation in the market, and supporting the competitiveness of UK asset managers. We expect all firms will incur familiarisation and legal review costs while regulated SRs will face some loss of revenue due to rule changes consequential to the removal of the registration regime. Taken together, we expect the market wide impact to be a deeper securitisation market driven by greater supply from manufacturers and greater demand from investors.

**Table 1: Summary of Costs and Benefits**

| Group affected              | Item description   | Benefits (£m) |                         | Costs (£m) |         |
|-----------------------------|--|---------------|-------------------------|------------|---------|
|                             |  | One off       | Ongoing                 | One off    | Ongoing |
| All firms                   | Familiarisation and legal review   |               |                         | 0.60       |         |
| Manufacturers               | Annual reduction in cost from transparency proposals                         |               | 11.76<br>(6.40 – 21.83) |            |         |
| Investors                   | Annual reduction in cost from due diligence proposals                        |               | 7.95<br>(0.15 - 37.14)  |            |         |
| Securitisation Repositories | Rule changes consequential to the removal of the registration regime for SRs |               |                         |            | 0.10    |
| Total                       |  |               | 19.70<br>(6.55 – 58.96) | 0.60       | 0.10    |

Note: to reflect uncertainty in some estimates, these are presented as: "Central estimate (Lower bound – Upper bound)"

7. The reforms are expected to deliver direct annual cost savings of £19.70m to market participants, including manufacturers of and investors in securitisations, with a central estimate for the net present value (NPV) of £168.15m over a 10-year appraisal period. This corresponds to an estimated annual net direct cost to business of -£19.53m. Ceasing to require manufacturers to report data to SRs could result in lost profits for the SRs themselves, which we estimate at c.£100k annually. However, we expect significant benefits to manufacturers from ceasing to impose this requirement, having estimated the market wide cost savings as £3.24m. Hence, this policy proposal is deemed proportionate given that the benefits to the market outweigh the costs to the SRs.
8. The reforms are aligned with the FCA's secondary objectives of promoting international competitiveness and economic growth. By increasing credit availability, improving market liquidity and risk management, lowering funding costs, and fostering efficient allocation of capital, the proposals can encourage UK economic growth in the medium-to-long-term. Further, they strengthen the UK's competitiveness by reducing excessive costs, thereby making the UK a more attractive place to issue and invest in securitisation.
9. We consider our proposals from the perspective of "rebalancing risk." While securitisation supports credit provision and risk transfer, we found it can increase systemic risk if not adequately regulated, as shown during the GFC. While the existing framework is effective at mitigating market failures and associated risks, poorly targeted requirements can impose significant costs without improving outcomes. Consequently, the proposals will remove ineffective and burdensome requirements without materially increasing systemic risk.
10. The proposal that could lead to a slight increase in risk is the ceasing to prohibit UK institutional investors from investing in securitisations that do not comply with UK standards around the manner of risk retention, as is the case for a significant percentage of U.S. collateralised loan obligations (CLOs). We judge this risk to be low and outweighed by the benefit of widening investment opportunities for UK firms and their clients.
11. The FCA will monitor the impact of the reforms through indicators such as securitisation issuance volumes, investor participation, and transaction structures. This will allow us to mitigate residual risk from our proposals and ensure that the framework remains effective and proportionate.

## Introduction

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12. The Financial Services and Markets Act (2000) requires us to publish a CBA of our proposed rules. Specifically, section 1381 requires us to publish a CBA of proposed rules, defined as 'an analysis of the costs, together with an analysis of the benefits that will arise if the proposed rules are made.'
13. In this CBA, we assess the impact of our proposals to reform SECN. This analysis presents estimates of the significant impacts of our proposals. We provide monetary values for the impacts where we believe it is reasonably practicable to do so. For others, we provide a qualitative explanation of their impacts. Our proposals are based on

weighing up all the impacts we expect and reaching a judgement about the appropriate level of regulatory intervention.

**14.** The CBA has the following structure:

- The UK securitisation market
- Problem and rationale for intervention
- Options assessment
- Our proposed intervention
- Causal chain
- Baseline and key assumptions
- Summary of impacts
- Benefits
- Costs
- Wider economic impacts
- Risks and uncertainties
- Monitoring and evaluation

## The UK securitisation market

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### Defining securitisation

**15.** Securitisation is a financial process that transforms assets into more liquid investments. The originator (typically a bank or non-bank lender) pools together assets, such as mortgages or auto loans, and typically sells them to a securitisation special purpose entity (SSPE), which has been created specifically to issue securities. As the SSPE is legally distinct from the originator, the SSPE is isolated from the originator's bankruptcy risk. The SSPE uses the pooled assets as collateral to issue asset-backed securities (ABS) which are sold to investors. The investors receive the interest and principal payments from the securities which vary depending on the level of risk of the tranche they are invested in. Synthetic securitisations achieve a similar outcome, but rather than the originator transferring the assets to the SSPE, they use a financial instrument to transfer the credit risk to investors in exchange for the payment of a fee.

**16.** Tranching is a fundamental feature of the securitisation process. The securities issued by an SSPE are divided into different layers, or "tranches," each with different risk and return characteristics. Each tranche represents a claim on the cash flows generated by the underlying asset pool, but they are structured so that losses are absorbed in a specific order. Typically, more senior tranches receive priority in payments while, conversely, junior or subordinate tranches absorb potential losses as they occur. This structuring allows securitisations to appeal to a broad range of investors with varying risk appetites and investment objectives.

## The importance of the securitisation market

17. Securitisation is an important part of the UK's wholesale debt market and a valuable tool for UK banks and non-bank lenders to help fund and mitigate the credit risks of lending to companies and households. By providing access to capital and enabling risk transfer, a well-functioning and robust securitisation market supports lending, investment, and economic activity. In this way, securitisation serves as an important link between the financial markets and the real economy.

## Increased access to funding

18. Securitisation provides alternative access to funding for lenders. In a true-sale securitisation, originators sell their portfolio of assets to the SSPE and receive the purchase price for the portfolio funded by the issuance of the securitised notes. This allows them to reinvest such funding into new lending. The conversion of illiquid assets into tradable securities inherently boosts bank liquidity ([Pinto and Alves 2016](#)).

## Risk transfer/management

19. By distributing risk associated with the underlying assets, securitisation can also allow the originator to reduce its exposure to credit risk either by a true sale of the assets or by using a synthetic securitisation structure. This risk transfer mechanism frees up capital for originators, enabling them to provide more lending and financing to the real economy ([Loutskina 2011](#)) and potentially enabling lenders (especially smaller lenders) to provide more competitive rates to borrowers in the real economy. This also allows for a wider distribution of risk, avoiding pockets of credit-risk concentration in certain parts of the financial system ([Loutskina 2011](#)).

## Increased access to a wider pool of investments

20. By investing in notes backed by a pool of assets, investors can indirectly access a wider pool of risk that might otherwise be difficult or impractical to obtain exposure to directly. For example, a pension fund would lack the expertise and infrastructure to originate and manage individual mortgages, but the same exposure can be achieved by investing in mortgage-backed securities. This serves to expand the investable universe and contributes to market liquidity and market integrity.

## The size of the securitisation market

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### Public true-sale securitisations and CLOs

21. Currently, there is £347 billion outstanding in securitisations in the UK, covering public true-sale securitisations and UK managed CLOs.

- 22.** We estimate that the total outstanding value of UK public true-sale securitisations (excluding CLOs) is £180 billion spread across 382 individual securitisations. There has been an annual average of 74 UK issuances of public securitisations (excluding CLOs) with a total issuance size of £46 billion per annum in the five-year period between 2020 and 2024.
- 23.** The total outstanding of UK CLOs (defined as a CLO managed by a UK based manager) amounts to £167 billion spread across 533 transactions. Most, if not all, UK CLOs are euro-denominated and backed by a pool of European loans. UK-managed CLOs represent 69% of the total outstanding of European CLOs (total outstanding being €289 billion). New issuances of UK CLOs average 88 transactions per year, including refinancings and resets as well as new transactions, and amount to an issuance average of £29.8 billion per annum.
- 24.** When broken down by asset type, the UK public securitisation and CLO market consists of:
- Residential mortgage-backed securities (RMBS) accounting for 43%.
  - UK managed CLOs accounting for 38%.
  - Auto loans accounting for 5%.
  - Credit card receivables accounting for 5%.
  - Commercial mortgage-backed securities (CMBS) accounting for 3%.
  - Consumer loans accounting for 1%.
  - Esoterics accounting for 4%.

### Private securitisation market

- 25.** The private securitisation market consists of three types of securitisations: (1) asset-backed commercial paper (ABCP) securitisations (trade receivables financing being the largest segment), (2) synthetic securitisations (mostly significant risk transfer (SRT) transactions by banks) and (3) other private securitisations. Compared to the public market, it is more difficult to accurately measure the size of the private securitisation market because new deals are not announced or made widely available.
- 26.** Apart from synthetic securitisation, an industry report on the total European private cash securitisation market indicated a market size of at least €250 billion in the second half of 2024. 13% is attributed to UK originators, suggesting a UK private cash securitisation market of approximately £27 billion. The majority (87%) of this is driven by ABCP, short-term asset-backed debt instruments typically backed by trade receivables and auto loans or leases. ABCP programmes are normally sponsored by a bank which manages and provides support to the programme.
- 27.** One of the larger segments of the private UK securitisation market is the SRT segment which has a market size of £120 billion by protected assets size at the end of 2024. In the UK, SRT issuance has risen consistently over the past decade, with reference assets increasing from approximately £10 billion annually in 2014 to £30 billion annually in 2024. Originators in the UK SRT market are Prudential Regulation Authority (PRA)-authorised banks and building societies which are subject to the UK Capital Requirements

Regulation (CRR). The figures on the private securitisation market are based on FCA internal data from notifications received by the FCA together with corresponding data from the Bank of England.

## Market participants

- 28.** Firms' roles vary from originator or original lender of the assets, servicer of the assets (i.e. the entity collecting the payment from the borrowers), managers of CLOs, arranger/distributors of securitisations, warehouse line providers and investors. We have estimated the number of sell side manufacturers of securitisations to be around 325 in the public market.

**Table 2: Market participants: originators, sponsors, and servicers**

|                        | Number  |
|------------------------|---|
| Originators / Sponsors | 139   |
| Of which:              | Originators / Sponsor – dual regulated (with the PRA) |
|                        | Originators / Sponsor – solo regulated (FCA only)     |
|                        | Originators / Sponsor – unregulated                   |
| CLO managers           | 50  |
| Servicers              | 136   |
| Total                  | 325   |

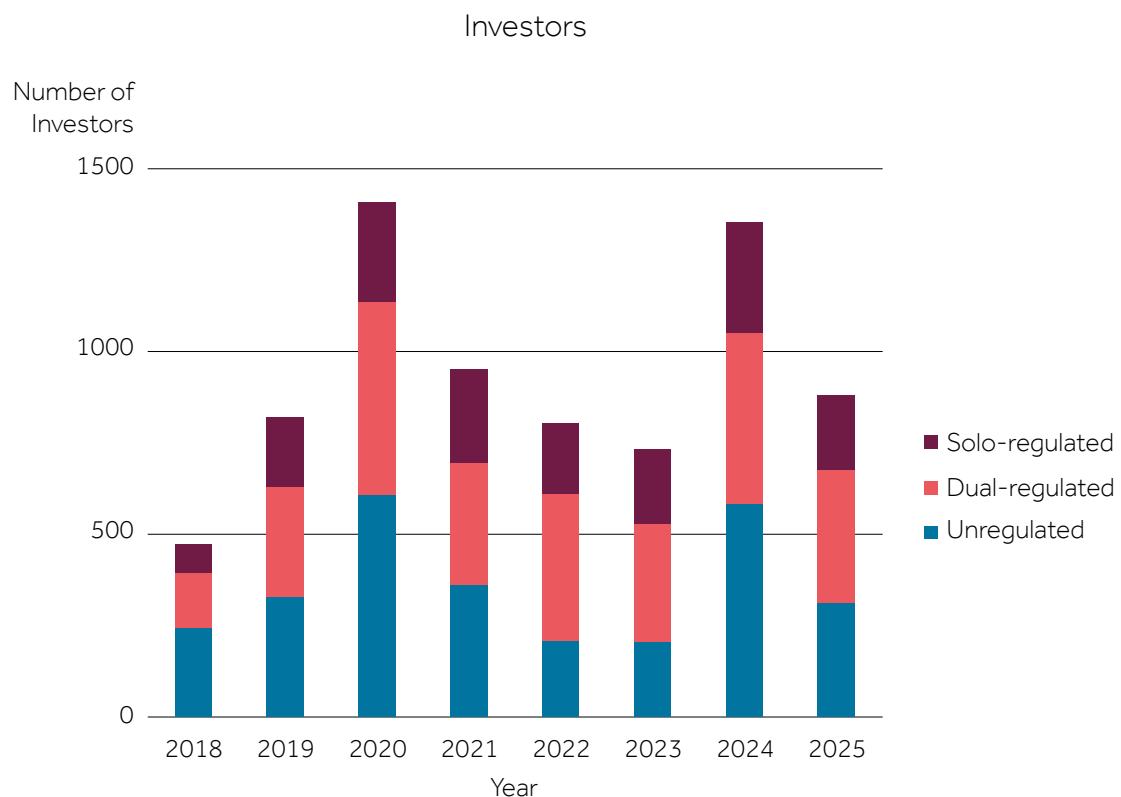
Source: Bloomberg/Pitchbook/FCA internal calculations - based on public securitisation data as of Q1 2025

- 29.** The private securitisation market will add a number of originators to those estimated for the public market. They consist mainly of unregulated corporate entities issuing trade receivables that are being financed through an ABCP conduit.
- 30.** We have estimated the size of the investor population by reviewing markets in financial instruments directive (MiFID) transaction data for public securitisations in the UK from 2018 – 2025. We identified 16,234 transactions, mapping the buyer's Legal Entity Identifier (LEI) against one of: a) dual-regulated, b) solo-regulated, or c) non-regulated investors. Investors classified as neither dual-regulated nor solo-regulated are typically foreign firms transacting with UK firms. Subsequently, we identified unique investors in each instrument, using the buyer's LEI in the MiFID transaction data.

**Table 3: Annual unique investor-instrument pairings**

| Year  | Dual-regulated | Solo-regulated | Not regulated |
|-------|----------------|----------------|---------------|
| 2018  | 149            | 78             | 244           |
| 2019  | 302            | 189            | 328           |
| 2020  | 526            | 275            | 609           |
| 2021  | 334            | 257            | 362           |
| 2022  | 401            | 194            | 207           |
| 2023  | 322            | 208            | 205           |
| 2024  | 469            | 304            | 582           |
| 2025  | 360            | 205            | 314           |
| Total | 2863           | 1710           | 2851          |

**Figure 1: Annual unique investor-instrument pairings**



31. Finally, we counted the unique LEIs across the dataset to arrive at the number of unique investors in public UK securitisations. The number of firms participating in this market as investors is summarised below.

**Table 4: Unique investors participating in public UK securitisation market**

|                 | Dual-regulated | Solo-regulated | Neither |
|-----------------|----------------|----------------|---------|
| Number of firms | 70             | 56             | 567     |

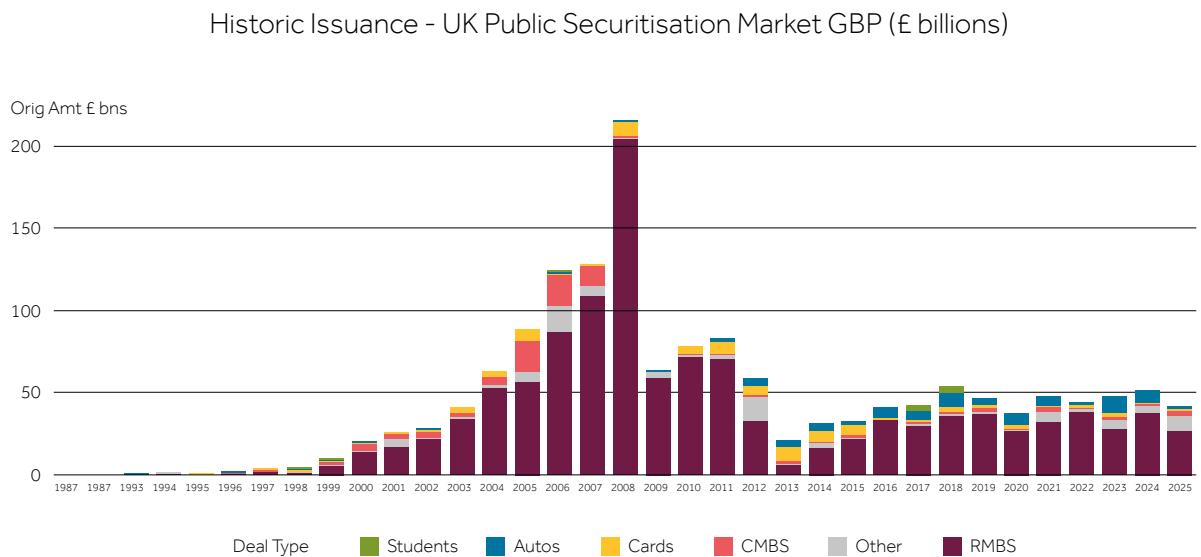
Source: FCA internal calculations – based on MiFID data

## Evolution of the securitisation market in the UK

### Issuance

32. Issuance in the UK public market (excluding CLOs) increased year on year from 1998 where it was at low levels (around £10 billion) reaching its peak in 2008 at around £230 billion. Issuance then dropped in 2009 after the GFC to around £65 billion. Since 2013, the public market has remained below £50 billion in most years.

**Figure 2: UK Public Market Issuance (ex-CLOs)**



Source: FCA analysis from multiple internal and external data sources - based on public securitisation data as of Q1 2025

### Total outstanding volume

33. Since reaching its peak of over £600 billion total volume of securitised assets in 2009 (excluding CLOs), the UK market has remained stable at around £50 billion a year. This trend underscores the lasting impact of the GFC, structural economic factors such as

low interest rates, and subsequent regulatory reforms which eliminated products such as collateralised debt obligation (CDO) of ABS and correlation trades ([Deutsche Bank, 2024](#); [Bank of England & European Central Bank, 2014](#)).

**Figure 3: UK total outstanding volume (ex-CLOs)**



Source: data from AFME reports from 2007-2025. For example: [Securitisation Data Report Q4 2024 & 2024 Full Year | AFME](#)

## History of securitisation regulation and policy

- 34.** The EU SR was introduced to restore investor confidence in the sector ([ESMA, 2015](#)). The [2015 European Commission Impact Assessment](#) noted that trust in the European market was undermined by events that took place in U.S. markets. This resulted in low demand for securitisation products.
- 35.** The EU SR came into effect in January 2019 and was incorporated into UK law at the end of the Brexit transition period on 31 December 2020. The UK SR 2024 replaced the assimilated EU law in relation to securitisation and established a new framework for securitisation in the UK. Minor changes to our rules were incorporated at that time. Under the new framework, the securitisation requirements that apply to firms are set out in the FCA and PRA rulebooks.
- 36.** Supervisory responsibility for the UK securitisation market is shared between the FCA and the PRA.
- 37.** FCA rules are contained in SECN, which sets out the requirements for FCA regulated firms (other than those regulated by the PRA) and other UK firms acting as originators / sponsors / SSPEs of securitisations. It also sets out rules for certain FCA solo-regulated firms acting as investors in securitisations. SECN also includes provisions applicable to SRs and third-party verifiers. The current FCA and PRA rules remain very closely aligned to the rules that apply in the EU. In formulating our proposals for consultation, the FCA is working closely with the PRA.

## Problem and rationale for intervention

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### Description of harm

38. The UK securitisation market has remained subdued since the GFC. Some argue that a contributing factor may be the excessive costs imposed by the rules. The harm emanates from two principal areas: reporting obligations and due diligence requirements.
39. The key harms we observe in the UK securitisation market are:
- Disproportionate compliance costs incurred to meet regulatory requirements while not necessarily achieving the desired outcome, leading to a suboptimal level of securitisation activity and thus less lending in the real economy.
  - More subdued risk transfer and distribution activities through securitisation, preventing investors from optimally allocating in accordance with their risk-return profile.
  - Loss of activity in UK markets as the restrictions push activity to other markets.
40. The transparency regime imposes significant costs on securitisation manufacturers without providing commensurate benefit to investors. Manufacturers are required to provide detailed disclosure at the time of issuance and on an ongoing basis. For public securitisations, detailed data must be reported to an SR. Securitisations that are not public are subject to similar transparency requirements (and, accordingly, costs), although their manufacturers do not have to report the information to an SR.
41. The European Commission (EC) gathered data on the costs of the EU regulatory framework for securitisation, which is highly aligned to our regime. Using this data, we have estimated the costs to comply with the current transparency requirements. A manufacturer would need to incur one-off costs of £500k to comply with the transparency requirements, and ongoing costs of £375k. For each asset class, a manufacturer would also need to set up a template at a one-off cost of £104k per asset class.
42. We understand that the resulting reporting is of limited use to investors in many cases. For example, we understand that the 'one-size-fits-all' investor report templates are not often used by investors to inform their assessment of the ongoing performance of a given securitisation.
43. While the prescriptive templates are considered by investors to be reasonably well-suited for the more standardised asset classes such as RMBS, they are not seen as particularly helpful for investors in less standardised asset classes, for example CMBS. Standardised reporting for non-standardised asset classes makes it difficult to complete the templates. Consequently, the templates are not always used by investors who prefer other means of receiving the data. The current templates are seen by stakeholders as particularly ill-suited for esoteric transactions and new asset classes, slowing down

innovation with no commensurate benefit to investors who are more likely to require specific/new information about the underlying exposures.

- 44.** The information published by SRs is considered by some stakeholders difficult to access and process because it is published in a format that is difficult for an investor to use quickly and easily. Consequently, investors do not use the data from SRs to the extent that we initially anticipated, instead accessing the data they need directly from originators or third-party providers.
- 45.** Thus, transparency data is costly to provide and not systematically used by investors. The regime imposes a large, fixed cost on firms that are considering issuing securitisations. This reduces the incentive to securitise assets as it is more likely that the benefits of lower capital costs are outweighed by the compliance costs. This is likely especially true for firms seeking to issue smaller securitisations or infrequent issuances.

### ***Due diligence requirements***

- 46.** Due diligence rules in SECN are significantly more prescriptive than the requirements applicable to investors in other financial instruments. UK institutional investors are currently required to verify that the securitisations they invest in are compliant with UK requirements or similar standards, including adherence to underwriting standards, adequate disclosure and a 5% risk retention requirement (a minimum of 5% retention of the securitisation's net economic interest by the originator which is designed to align their interest with that of the investors).
- 47.** Some argue that the due diligence obligations bring little additional benefit and are not calibrated to either the size of the investment or its level of risk.
- 48.** UK institutional investors are already required to comply with sectoral regulatory frameworks applicable to different types of asset managers and investment firms. These rules set standards for due diligence and risk management to ensure firms appropriately evaluate the risk of their positions, including securitisations.
- 49.** However, the cost of due diligence makes investments in securitisation below a certain size prohibitive for investors. We estimate that the one-off costs of the due diligence requirements are £32k for each investment.
- 50.** In addition, the due diligence requirements have been said anecdotally to slow down investment decisions to the extent that in stressed market conditions, UK investors may not be able to take advantage of a pricing dislocation to take a securitisation position (for example in scenarios such as the liability-driven investment crisis). In this case other international investors were able to act swiftly, putting UK investors at a competitive disadvantage.
- 51.** UK investors are also unable to invest in overseas securitisations that do not meet UK risk retention standards. For example, UK asset managers cannot invest in U.S. open-market CLOs, a significant asset class. This leaves UK asset managers unable to compete with overseas asset managers, as they are unable to provide exposure to these asset classes. Hence, those investors may go elsewhere, and UK asset managers may have incentives to relocate.

## Drivers of harm

52. The securitisation framework is designed to address the market failures that emerged before and during the GFC. The proximate cause of the crisis was negative externalities generated by defaults in securitised assets. As the shocks rippled outwards, the contagion effect spread far beyond the institutions holding the underlying securitised assets. During the 2008 GFC, the costs of these systemic failures were paid by governments and taxpayers rather than by market participants ([Brunnermeier, 2009](#); [Acharya et al, 2010](#)).
53. A central feature of the pre-crisis securitisation market was the substantial information advantage held by originators of the underlying asset pools. This information asymmetry created two interrelated problems ([Gorton, 2009](#); [Keys et al, 2009](#)): moral hazard and adverse selection. Asymmetric information led to misaligned incentives across the securitisation value chain ([Ashcraft & Schuermann, 2008](#)), with originators incentivised to maximise loan volumes and credit risk transfer, manufacturers incentivised by fees to underwrite more transactions, and investors heavily relying on credit rating agencies instead of conducting independent due diligence assessments.
54. As a result, the regulatory framework was designed to address these market failures from which the harm of the GFC emanated. While the framework is largely effective at mitigating these market failures and associated risks, we have found that aspects of these reforms, or their calibration, create significant costs for firms without improving market outcomes.
55. **Ineffective or outdated regulatory interventions:** Post GFC, regulatory reforms sought to mitigate systemic risk by imposing stricter transparency and due diligence requirements and with the introduction of the risk retention rules. While these interventions sought to address pre-crisis market failures, they have overcompensated in some areas by imposing compliance costs disproportionate to the risks involved and the benefits obtained ([Hauet, 2023](#)).
56. Furthermore, the transparency requirements in the SECN mandate detailed, template-based reporting by manufacturers. While designed to support investors and supervisors, this approach has produced significant operational burdens without always delivering practical benefits. Investors prefer to access this information through other channels, rendering the prescriptive templates of limited utility in some cases. Therefore, our proposals focus on moving from prescriptive transparency requirements to a principles-based approach for some asset classes as appropriate.
57. **Regulatory arbitrage:** Inconsistent application of securitisation rules across jurisdictions encourages regulatory arbitrage. For example, differing treatment of risk retention standards, like exemptions for U.S. open-market CLOs compared to the mandatory application of the requirement in the UK, creates an uneven playing field and distorts investment decisions.

## Options assessment

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- 58.** We compared the costs and benefits of various policy options, including from the perspective of "rebalancing risk." This approach recognises the important role risk-taking plays in driving innovation and delivering benefits for consumers in financial services markets, whilst also reducing harm where needed. Therefore, the preferred policy options below strike the appropriate balance between encouraging beneficial activity whilst ensuring that harms do not proliferate beyond acceptable levels.

### Transparency

- 59.** We explored several options to amend the transparency requirements and the role of SRs. Roundtable discussions with a range of market participants strongly suggested that the current transparency requirements were excessively burdensome and costly. The 'doing nothing' option would have ensured that the unjustified burden to manufacturers without commensurate benefits to investors would have continued. As such, this option was rejected.
- 60.** In relation to SRs, various alternative options were analysed that fell short of ceasing to require reporting of information to regulated SRs entirely. We considered the impact of alternative options such as maintaining regulated SRs while moving away from the Extensible mark-up language (XML) format for the templates. This, at the margin, might have encouraged investors to use SR data more widely but, given that they are already accustomed to using information from other sources, increased usage may not have materialised in practice. Furthermore, it would be difficult to align the transparency requirements for public and private securitisations (a key policy proposal, please refer to the consultation paper) while maintaining regulated SRs, given the concerns expressed in industry feedback to the EC's 2024 consultation regarding the proposal that private securitisations be reported to a regulated SR. Those concerns included loss of confidentiality and increased costs to manufacturers without any obvious benefit since the information would not be made public.
- 61.** In summary, maintaining the requirement to report to regulated SRs would have been difficult to achieve in a regulatory environment where the distinction in treatment between public and private securitisation was removed. This together with the excessive costs of reporting to SR versus its benefits led us to the proposed solution of ceasing to require reporting of information to regulated SRs.

**Option 1. Replace all reporting templates with a principles-based approach to reporting requirements for all types of securitisations. (Manufacturers would not be required to submit templates to SRs).**

- 62.** This approach would move the transparency reporting requirements to a high-level principles-based approach, giving manufacturers (and, indirectly, investors) a degree of discretion in what is included in their disclosures. This option would not require any standardised reporting template.
- 63.** This approach was rejected because some asset classes (such as auto loan and residential mortgages) are already very standardised, and templated disclosures in

those cases provide a useful source of information to allow for comparability across transactions from different manufacturers which is helpful for investors in performing their due diligence. Accordingly, a fully principles-based approach may have hindered investors' ability to obtain the granular information they need to assess the risks of a securitisation.

**Option 2. Remove the distinction in treatment between public and private securitisations and create a simplified standardised template for disclosure. (Manufacturers would not be required to submit templates to SRs).**

- 64.** This option involved removing the distinction in treatment between public and private securitisations for transparency purposes, simplifying some of the current standardised templates and removing mandatory reporting templates where they introduced unnecessary burden. It also entailed ceasing to require reporting of information to regulated SRs, for the same reasons discussed under Option 1.
- 65.** The obligation to disclose information about underlying exposures stays the same but the format in which this information is provided to investors is substantially changed, leaving much more flexibility for the market to find the best way to report it.

**Option 3. Maintain the distinction in treatment between public and private securitisations, broaden the definition of public securitisation to capture 'public in substance' securitisations, revise the current standardised templates and create simplified templates for private securitisations (with the role of SRs remaining unchanged).**

- 66.** Under this option, the current templates would be required only for public securitisations and would undergo a field-by-field review with some removal/ amendment/introduction of fields. As such, UK templates would remain broadly aligned with the current EU templates.
- 67.** However, the definition of public securitisation would be broadened to include "public in substance" transactions. Public templates would continue to be required to be reported to regulated SRs but no longer required to be in XML format. Private securitisations would be subject to principles-based reporting with no specific templates.
- 68.** This option was rejected because maintaining the delineation in treatment between public and private securitisations inherently creates arbitrary boundaries and incentivises regulatory arbitrage, counter to our objective of maintaining high standards of market integrity and investor protection. Additionally, this option was deemed unlikely to reduce ongoing costs of compliance.
- 69.** Moving away from requiring the XML format while retaining SRs in their current role may have encouraged their use by investors to access information. However, we discounted this option because we do not consider that it is compatible with our ambition to move to a more flexible and proportionate approach given the cost imposed by the current framework and the feedback from stakeholders that it does not always work for all asset classes. In particular, we consider that its potential advantages, including standardisation and centralisation, are more than offset by the costs of a rigid system. We have no evidence that a centralised approach such as the current one has fostered

more standardisation or led to better data quality or information that is more actionable by investors.

- 70.** Conversely, we have received feedback that investors do not tend to rely on the data made available by SRs to make investment decisions, finding some templates less than useful (e.g. investor reports), and others, whilst useful, in a format that makes them less than ideal. Instead, they rely on other sources of information. Securitisations with novel underlying assets or structures, on the other hand, do not easily fit into the current framework and there may even be a risk that manufacturers are not incentivised to provide the information that is deemed important by investors. In summary, the potential benefits of centralisation through SRs have not been fully realised and therefore it is difficult to justify the costs of reporting to them.

#### **Option 4. A combination of Option 1 and Option 2**

- 71.** In summary, the option that was deemed the most advantageous is a combination of elements from both options 1 and 2. This option involves removing the distinction in treatment between public and private securitisations for transparency obligations, simplifying the current standardised templates (ceasing to require templated information for certain asset classes) and ceasing to require UK manufacturers of securitisations to submit templates to SRs. This option was refined in response to feedback and investor roundtable sessions and is the option that we propose.
- 72.** For manufacturers who seek to offer securitisations to EU investors, we propose accepting the EU underlying exposures templates as an alternative to the UK template. We also consider that further benefits could be achieved for the market by amending the retained templates to align them to the Bank of England loan level data templates used in the assessment of eligible collateral for their liquidity operations.
- 73.** We assessed transparency options from the perspective of "rebalancing risk." A combination of Options 1 and 2 represents the most balanced, risk-informed approach. It fosters flexibility for manufacturers and removes costly, burdensome requirements, while retaining key prescriptive elements necessary to ensure an acceptable baseline of information for investors.

#### **Due Diligence**

- 74.** As regards due diligence, again several options were explored.

#### **Option 1. Do nothing. Make no policy change.**

- 75.** This approach would signal that the FCA has determined that the current due diligence rules are fit for purpose and are working as intended. This policy option was rejected as it does not directly address any of the challenges obtained from industry participants detailed in this paper.

#### **Option 2. Altogether remove the requirements on institutional investors to conduct specific due diligence for investments in securitisations.**

76. This policy option would involve removing SECN 4 in its entirety. This option was not retained on a number of grounds, including that we consider minimum standards and useful guidance for due diligence as helpful in setting our expectations.

**Option 3. Remove the detailed requirements and provide instead, high-level guidance to institutional investors.**

77. Our preferred option involves retaining the requirements in SECN 4 at a high level and replacing the more detailed obligations with high level principles-based guidance. This should give investors the ability to more effectively tailor their due diligence systems and practices and calibrate their resources based on the level of risk of the investment as well as the characteristics of their mandate and risk appetite.
78. We assessed due diligence options from the perspective of "rebalancing risk." Option 3 represents the most balanced, risk-informed approach because, like transparency, it retains high level guidance while affording a level of flexibility that encourages informed risk taking by investors.

## Our proposed intervention

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### Summary of intervention

79. Below we summarise at a high level the specific regulatory interventions aimed at preventing the harm identified.

#### *Transparency*

- A reduction in the number of reporting templates, in some cases replacing templates with a principles-based approach.
- Remove of the requirement to produce templates in XML format.
- An exemption from making information available through underlying exposure templates for single-loan securitisations.
- A simplification of retained underlying exposures templates and alignment with the Bank of England loan level data templates.
- The introduction of a simplified underlying exposures template for CLOs.
- Ceasing, in most cases, to distinguish between public and private securitisations in the application of transparency requirements.
- Taking steps, in coordination with the Treasury, with a view to no longer requiring information to be reported by manufacturers to regulated SRs.
- An amended approach to the provision of underlying documentation relating to a securitisation.

## ***Due Diligence***

- Remove the requirement for investors to verify that a manufacturer has adhered to the relevant SECN provisions on credit granting and sufficient information.
- Amend the requirement to verify the manufacturer's compliance with risk retention rules with a provision whereby, as part of their due diligence assessment, institutional investors must be satisfied that a non-UK originator, sponsor or original lender maintains, on an ongoing basis, a sufficient and appropriate alignment of commercial interest in the performance of the securitisation.
- Remove the more prescriptive aspects of the rules and provide guidance as to how the rules could be complied with.
- Remove the requirement for investors to verify compliance with the requirements for Simple, Transparent and Standardised (STS) securitisations.

## ***Other technical changes***

- 80.** The proposals cover other technical changes. We do not expect a material impact on the costs or benefits of our proposals to arise because of the changes to our rules.
- **Resecuritisation:** maintain the existing ban on resecuritisation but introduce narrow exemptions for PRA-authorised firms. FCA institutional investors will be allowed to invest in such resecuritisations.
  - **Risk retention:** introduce an additional L-shaped risk retention modality, combining vertical and first-loss approaches.
  - **Credit granting:** clarify certain aspects of the criteria for credit-granting to ensure that setting a minimum threshold for the quality of underwriting standards for securitised assets is met.
- 81.** We are also proposing a small number of clarifications and minor technical changes. More detail on these is provided in the consultation paper.

## ***Causal chain***

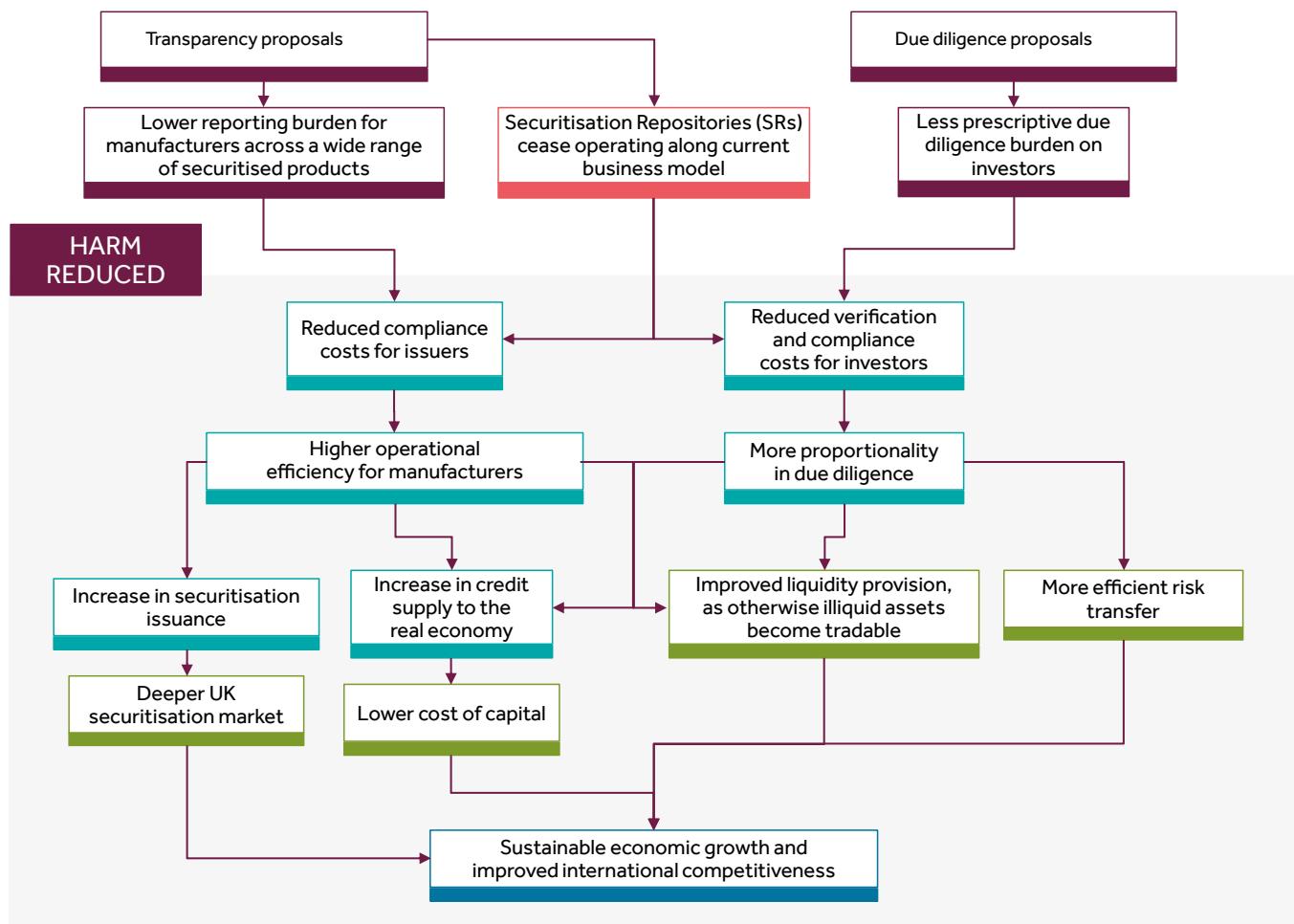
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- 82.** Our causal chain illustrates how our proposed regulatory interventions will impact the securitisation market. The proposed reforms to SECN aim to recalibrate regulatory requirements to reduce unnecessary burden to firms while preserving market integrity, investor protection, and supporting sustainable economic growth and the UK's international competitiveness.
- 83.** The immediate effect on market participants will be to reduce compliance costs. Lower operational costs for manufacturers will increase efficiency when issuing securitisations. For investors, a shift to a more principles-based approach to due diligence will ease friction and allow for more proportionate risk assessments as well as an increased ability

to compete with overseas asset managers which are not subject to certain limitations to their ability to invest. These changes collectively will improve operational efficiency across the securitisation process.

- 84.** Lower costs and reduced complexity are expected to stimulate issuance and broaden investor participation. This will deepen market liquidity and strengthen the role of securitisation as a channel for risk transfer and funding, with a more active securitisation market facilitating improved liquidity and risk distribution. Originators will gain capacity for new lending (Shin, 2009), while investors will access diversified exposures aligned with their risk preferences.
- 85.** We expect these mechanisms to converge to lower the cost of credit and improve the allocation of resources across the economy (Duponcheele et al, 2024). By supporting investment and productivity, these reforms should contribute to sustainable growth and enhance the UK's international competitiveness.

**Figure 4: Causal chain for reforms to UK securitisation regulation**



## Baseline and key assumptions

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### Baseline

- 86.** We assess the impact of our proposal against a baseline or counterfactual of what would happen in the absence of the proposed intervention. In the section on the evolution of the securitisation market in the UK, we showed that issuance in the UK securitisation market was relatively constant. Consequently, we expect volumes in the future under our baseline to be similar to the current level.

### Key assumptions

- 87.** The FCA assesses the impact of its proposals over a 10-year appraisal period, starting from the point of implementation. Where the FCA estimates the NPV of costs and benefits, it uses a 3.5% discount rate, in line with the Treasury's Green Book. All estimates are in 2024 prices.
- 88.** To estimate the cost to firms of complying with our proposals, the FCA uses its standardised cost model (SCM). The SCM is used to standardise the assessment of common recurring costs across our CBAs. More information on the approach taken by the SCM can be found in [Appendix 1 of the statement of policy](#), including how it categorises firms and determines costs to firms based on standardised assumptions.
- 89.** To calculate the impact of our transparency proposals, we use the following key inputs on the overall market size as of September 2025.
- Average annual number of new issues (public, ex-CLO, last 5 years): 74.
  - Total number of outstanding public securitisations: 382.
  - Number of CLOs managed by UK CLO managers: 533.
- 90.** We calculate the benefit to firms from our transparency proposals based on the market-wide impact of our changes to SECN. We then calculated the FCA relevant impacts by applying our estimate of the proportion of the activity attributable to solo-regulated firms. From the list of market participants that are originators/manufacturers, sponsors, CLO managers, or servicers, 56.6% are regulated solely by the FCA. This factor is used to scale the market wide impacts of our transparency proposals to arrive at a monetary estimate of the impact of our proposed changes.
- 91.** For private securitisations, we expect benefits to accrue to manufacturers from the increased flexibility afforded by our proposals. However, we are unable to quantify the benefits which could be similar to those achieved for public securitisations. As such our estimates could significantly underestimate the benefits of our policy package.
- 92.** Following discussions with the Treasury, we understand they are considering laying before Parliament a Statutory Instrument which will amend relevant parts of the UK SR 2024. Our proposed changes in relation to SRs changes will only be affected if, by that SI, the Treasury remove the registration regime for SRs in the UK SR 2024. It's not clear that the impact of the policy proposals in relation to SRs flows from our rule changes rather

than from the changes which will be made by the Treasury to the UK SR 2024. However, we have quantified the impact of both sets of changes within our CBA so that market participants can see in one place the expected direct costs and benefits arising from both the expected changes to the UK SR 2024 and our rules.

- 93.** To calculate the impact of our due diligence proposals, we rely on our analysis of MIFID transaction data to determine the number of unique investments in securitisations made by solo-regulated firms over an 8-year period.
- Average number of unique transactions, annually: 214.
  - Total number of unique transactions: 1710.
- ## EC consultation data
- 94.** Responses to the [EC consultation](#) on the functioning of the EU SR framework are an important data source for the costs and benefits of the proposed changes to our framework. The EC consultation was recent, comprehensive in its scope and relevant to our proposed changes. However, its robustness is limited by several factors. The data was collected through a voluntary survey of market participants, resulting in an uneven sample that may not be fully representative. Respondents answered questions across 12 topics with response rates varying across different sections. Responses varied in detail and quality, with some offering granular figures and others providing only qualitative estimates.
- 95.** We decided to use the information that the EC consultation elicited as a starting point for estimating the benefits of our proposals due to similarities in our respective frameworks and to avoid a disproportionate cost to firms from performing our own data collection. This would have offered limited marginal improvement on the data that we were already able to extract. The EC data is a reasonable proxy for the costs faced by UK market participants.
- 96.** All nominal euro values have been translated to pound sterling using the historic average method. The EC consultation period lasted between 9 October 2024 and 4 December 2024. Using Office of National Statistics daily exchange rate data, the historical average exchange rate during that period is 1.000 GBP = 1.199476 EUR.
- 97.** Due to the limitations of the EC consultation data, there is inherent uncertainty in the information we can extract from it. To ensure our analysis remains robust and transparent, we have used the lower and upper bounds of the available data to capture the plausible range of outcomes, rather than relying on a false sense of precision. This approach provides a realistic reflection of the uncertainty surrounding the magnitude of benefits that may be realised as a result of the proposed reforms.
- 98.** For the central estimates, we have taken a simple average of the relevant responses to the consultation. For the lower and upper bounds of the monetary estimates, we adopt a conservative approach by taking the lowest and highest figure in the responses respectively. For the proportional estimates, we have used the 10<sup>th</sup> and 90<sup>th</sup> percentile of the percentage range to reduce the influence of significant, unexplained outliers on our analysis.

99. Where we have used data for descriptive purposes only, we do not present a range. In two cases, we only had a single central estimate from the EC consultation data. There, we have applied a conservative lower and upper bound of 50% and 200% respectively of the central estimate.
100. To calculate potential cost savings from our proposals, we have extracted data from responses to the EC consultation. These monetary and proportional estimates cover the transparency and due diligence requirements of the EU framework. The following three tables present the key monetary and proportional estimates derived from the EC consultation data, which underpin our analysis of the expected cost savings and impacts of the proposed reforms.

**Table 5: Summary of monetary estimates from EC consultation, transparency questions, 2024 prices**

| Transparency cost estimates   | Central estimate (£) | Lower bound (£) | Upper bound (£) |
|---|----------------------|-----------------|-----------------|
| <b>Per firm outright cost estimates</b>   |                      |                 |                 |
| Annual ongoing costs to comply with current transparency requirements                   | 374,816              |                 |                 |
| One-off costs to set up procedures to comply with current transparency requirements     | 509,398              |                 |                 |
| <b>Per asset class template</b>   |                      |                 |                 |
| One-off costs to set up the procedures to comply with current transparency requirements | 104,212              |                 |                 |
| <b>Per transaction cost estimates</b>   |                      |                 |                 |
| Annual ongoing cost of transparency regulatory reporting, overall                       | 41,164               | 16,674          | 83,370          |
| One-off securitisation repository costs   | 7,920                | 6,670           | 8,337           |
| Annual ongoing securitisation repository costs  | 6,947                | 5,002           | 8,337           |
| Annual cost of producing underlying exposure templates                                  | 5,002                | 4,168           | 5,836           |
| Annual cost of producing underlying exposures templates for European CLOs               | 8,754                | 4,377           | 17,508          |
| Annual cost of producing investor report templates                                      | 8,337                | 4,168           | 16,674          |

Source: FCA internal calculations based on EC consultation responses

**Table 6: Summary of monetary estimates from EC consultation, due diligence questions, 2024 prices**

| Due diligence cost estimates                                       | Central estimate (£) | Lower bound (£) | Upper bound (£) |
|--|----------------------|-----------------|-----------------|
| Initial costs implementing compliance procedures for due diligence | 708,643              | 416,849         | 1,000,437       |
| One off cost per transaction in relation to due diligence          | 31,572               | 1,000           | 83,370          |
| Annual recurring cost per transaction in relation to due diligence | 10,977               | 556             | 37,516          |

Source: FCA internal calculations based on EC consultation responses

**Table 7: Summary of proportional estimates from EC consultation**

| Proportional estimates  | Central estimate (%) | Lower bound (%) | Upper bound (%) |
|---|----------------------|-----------------|-----------------|
| Reduction in overall costs related to due diligence proposals   | 32.3%                | 10.5%           | 50.0%           |
| Reduction in one off costs related to due diligence proposals   | 30.3%                | 10.0%           | 50.0%           |
| Reduction in recurring costs related to due diligence proposals | 31.4%                | 14.0%           | 44.0%           |

Source: FCA internal calculations based on EC consultation responses

## Summary of Impacts

- 101.** The summary table below sets out the benefits and costs of our proposed interventions, presenting both central estimates and plausible ranges to reflect uncertainty in the underlying data. Benefits are shown for affected groups (originator / manufacturers and investors) and capture the direct annual cost savings anticipated from our proposals. Taken together, we expect the annual ongoing benefit of our proposals to be £19.70m (between £6.55m and £58.96m). Costs are limited to one-off familiarisation and legal review expenses, which are borne by all market participants and total to £0.6m, and ongoing costs to SRs consequential to the removal of the registration regime for SRs, estimated at £0.10m annually.

**Table 8: Summary table of benefits and costs**

| Group affected              | Item description   | Benefits (£m) |                         | Costs (£m) |         |
|-----------------------------|--|---------------|-------------------------|------------|---------|
|                             |  | One off       | Ongoing                 | One off    | Ongoing |
| All firms                   | Familiarisation and legal review   |               |                         | 0.60       |         |
| Manufacturers               | Cost savings from ceasing to require reporting of information to regulated SRs       |               | 1.84<br>(1.36 - 2.15)   |            |         |
|                             | Retain but simplify underlying exposure templates for certain asset classes          |               | Not monetised           |            |         |
|                             | Cost savings for deleting certain underlying exposure templates                      |               | 0.21<br>(0.17 - 0.24)   |            |         |
|                             | Cost savings for designing more appropriate underlying exposure templates for CLOs   |               | 1.06<br>(0.53 - 2.11)   |            |         |
|                             | Cost savings for deleting investor report template                                   |               | 1.80<br>(0.90 - 3.61)   |            |         |
|                             | Cost savings for ceasing to require inside information / significant event templates |               | 6.86<br>(3.43 – 13.71)  |            |         |
| Investors                   | Annual reduction in cost from due diligence proposals                                |               | 7.95<br>(0.15 - 37.14)  |            |         |
| Securitisation Repositories | Rule changes consequential to the removal of the registration regime for SRs         |               |                         |            | 0.10    |
| Total                       |  |               | 19.70<br>(6.55 - 58.96) | 0.60       | 0.10    |

Note: to reflect uncertainty in some estimates, these are presented as: "Central estimate (Lower bound – Upper bound)"

- 102.** We quantify the present value (PV) of the benefits and costs over a 10-year appraisal period using a discount factor of 3.5%, consistent with Treasury's Green Book. To arrive at the NPV of our proposed intervention, we subtract the PV of costs from the PV of benefits. Because the substantial ongoing benefits outweigh the one-off costs to firms, we expect the 10-year NPV to be £168.15m as our central estimate with the range falling between £54.89m and £506.09m.

**Table 9: Present Value and Net Present Value**

|                  | 10-year PV Benefits (£m)   | 10-year PV Costs (£m) | 10-year NPV (£m)<br>(benefits-costs) |
|------------------|----------------------------|-----------------------|--------------------------------------|
| Total impact     | 169.61<br>(56.35 – 507.55) | 1.46                  | 168.15<br>(54.89 – 506.09)           |
| -of which direct | 169.61<br>(56.35 – 507.55) | 1.46                  | 168.15<br>(54.89 – 506.09)           |

- 103.** Alongside our calculation of the NPV of the proposed intervention, we also calculate the equivalent annual net direct cost to business (EANDCB). Assuming the same appraisal period and discount rate, the annuity rate for this calculation is approximately 8.61. We estimate the EANDCB of our intervention to be -£19.53m, with a range of -£6.38m to -£58.79m to account for uncertainty. The negative EANDCB represents a net benefit to business.

**Table 10: Net direct costs to firms**

|   | Total Net Direct Cost to Business, 10-year PV (£m) | EANDCB (£m)                 |
|---|--|-----------------------------|
| Total net direct cost to business<br>(costs to businesses - benefits to businesses) | -168.15<br>(-54.89 to -506.09)                     | -19.53<br>(-6.38 to -58.79) |

- 104.** The market wide benefits of ceasing to require reporting of information to regulated SRs (£3.24m, see table 11) outweigh the costs to the SRs themselves (£100k, see paragraph 148). While cognisant of the impact on SRs, we deemed it proportionate and appropriate to remove the requirement to report to SRs entirely, rather than proposing one of the alternative options discussed in the Consultation Paper. Further, the alternative options would have reduced the estimated market- wide cost savings significantly for little tangible benefit.

## Benefits

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### Transparency

- 105.** We summarise the annual market wide impact for our proposals around transparency in the following table. Further detail on the calculation of each benefit follows.

**Table 11: Summary of annual impact of transparency proposals, market wide**

| Annual market wide impacts  | Central estimate (£) | Lower bound (£) | Upper bound (£) |
|---|----------------------|-----------------|-----------------|
| Cost savings from ceasing to require reporting of information to regulated SRs        | 3,240,000            | 2,400,000       | 3,800,000       |
| Cost savings from deleting certain underlying exposure templates                      | 360,000              | 300,000         | 420,000         |
| Cost savings from designing more appropriate underlying exposure template for CLOs    | 1,870,000            | 930,000         | 3,730,000       |
| Cost savings from ceasing to require investor report templates                        | 3,180,000            | 1,590,000       | 6,370,000       |
| Cost savings from ceasing to require inside information & significant event templates | 12,100,000           | 6,050,000       | 24,200,000      |
| Sum of annual market wide impact for transparency proposals                           | 20,760,000           | 11,280,000      | 38,530,000      |

- 106.** The market wide impact of our proposals is scaled by 56.6% to arrive at the impact of our transparency proposals on FCA solo-regulated firms.

**Table 12: Summary of impact of transparency proposals, FCA solo-regulated firms**

| Annual impact on FCA solo-regulated firms   | Central estimate (£) | Lower bound (£) | Upper bound (£) |
|---|----------------------|-----------------|-----------------|
| Cost savings from ceasing to require reporting of information to regulated SRs        | 1,840,000            | 1,360,000       | 2,150,000       |
| Cost savings from deleting certain underlying exposure templates                      | 210,000              | 170,000         | 240,000         |
| Cost savings from designing more appropriate underlying exposure template for CLOs    | 1,060,000            | 530,000         | 2,110,000       |
| Cost savings from ceasing to require investor report templates                        | 1,800,000            | 900,000         | 3,610,000       |
| Cost savings from ceasing to require inside information & significant event templates | 6,860,000            | 3,430,000       | 13,710,000      |
| Sum of annual impact for transparency proposals on solo-regulated firms               | 11,760,000           | 6,390,000       | 21,830,000      |

## Cross-cutting changes

- 107.** We note that some manufacturers may continue to use SRs. However, for the purpose of this exercise, we assume that all manufacturers will choose to no longer use an SR as they would not be mandated to do so anymore. Manufacturers may incur some additional costs from making information available by other means, but we think this will be a fraction of the savings estimated. This is because most manufacturers already provide data to investors via other mechanisms.
- 108.** This proposal will lower one-off and ongoing reporting costs. To estimate the cost savings arising from this proposal, we consider the one-off SR costs per transaction and annual ongoing SR costs per transaction against the average number of issuances and total number of outstanding public securitisations.

**Table 13: Impact of ceasing to require reporting of information to regulated SRs**

|   | Central est. (£) | Lower bound (£) | Upper bound (£) |
|---|------------------|-----------------|-----------------|
| One-off regulated SR costs, per transaction   | 7,920            | 6,670           | 8,337           |
| Average number of new issues (public, ex-CLO, last 5 years)                                       | 74               |                 |                 |
| Annualised cost savings from eliminating one-off SR costs   | 590,000          | 490,000         | 620,000         |
| Annual ongoing regulated SR costs (per transaction)   | 6,947            | 5,002           | 8,337           |
| Total number of outstanding public securitisations  | 382              |                 |                 |
| Annualised cost savings from eliminating ongoing SR costs   | 2,650,000        | 1,910,000       | 3,180,000       |
| Annual market wide cost savings from ceasing to require reporting of information to regulated SRs | 3,240,000        | 2,400,000       | 3,800,000       |

**109.** Given an estimated annual ongoing cost of regulatory reporting of £41,200 per transaction, the £6,947 ongoing cost savings per transaction due to no longer reporting to SRs represents an outright c.17% reduction in regulatory reporting costs.

**110.** The other cross-cutting proposals in this package will result in further cost reductions. However, we have not quantified the cost savings associated with these specific proposals because their impacts are expected to be minor and incremental in nature. As such, it is not proportionate for us to collect data from firms to estimate the benefit of these proposals. The changes are designed to streamline existing processes and reduce administrative friction. These other cross-cutting proposals are:

- Manufacturers are no longer required to produce templates in XML format which should result in a simplified process and cost reduction, including potential reduction in fees for some manufacturers who currently pay third-party agents (other than SRs) to convert templates into the required format.
- Manufacturers are no longer required to provide 5 categories of description when data is not populated. A single 'No Data' response will be deemed sufficient. This should result in a simplified process, additional flexibility and reduce costs.
- For new entrants to the market, no familiarisation costs for producing templates in XML format and reporting to SRs. No one-off and ongoing fees due to SRs.

### ***Retain (but simplify) underlying exposure templates for certain asset classes***

**111.** We consider this proposal to be broadly cost neutral. A significant percentage of manufacturers already complete the Bank of England templates so that eligible

investors in their securitisations can access the Bank of England's liquidity facilities, and so simplifying the templates and aligning them to those required by the Bank of England will represent a cost saving. For those who do not produce the Bank of England template, there will be a familiarisation cost which we expect to be low because of the overlap in content between current and proposed templates.

- 112.** For manufacturers who seek to offer their issuances to EU investors, our proposals will allow them to satisfy UK requirements by making available to investors the current EU templates (except for the new CLO template).

### ***Cease requiring certain underlying exposure templates***

- 113.** We propose to stop requiring certain underlying exposures templates and to move to a principles-based approach for affected asset classes. This proposal would affect CMBS, credit card, and esoteric securitisations, which together account for c.19% of outstanding securitisations by volume.
- 114.** By removing the requirement to complete standardised transparency reporting templates for these asset classes, both new entrants and existing manufacturers will benefit from a significant reduction in compliance costs. Specifically, this reform is expected to deliver an overall cost saving to the market of approximately £363k per year.
- 115.** We also propose the disapplication of the requirement to complete underlying exposure templates for single-loan securitisations. We are unable to estimate the benefits of this proposed change because we do not hold data on the number of impacted securitisations. However, we expect the number to be minimal and accordingly the benefit to be marginal.

**Table 14: Deleting certain underlying exposure templates**

|   | Central est. (£) | Lower bound (£) | Upper bound (£) |
|---|------------------|-----------------|-----------------|
| Annual cost of completing relevant reporting templates                              | 5,002            | 4,168           | 5,836           |
| Total number of outstanding public securitisations                                  | 382              |                 |                 |
| Percentage of market affected   | 19%              |                 |                 |
| Annual market wide cost savings from deleting certain underlying exposure templates | 360,000          | 300,000         | 420,000         |

### ***Design a more appropriate underlying exposures template for CLOs.***

- 116.** We propose to introduce a more targeted underlying exposures template specifically for CLOs. This revised template will reduce the number of required data fields by 40%, thereby streamlining the reporting process for both new entrants and existing CLO manufacturers.

- 117.** Currently, the annual cost of producing the underlying exposures Annex 4 template for a European CLO is estimated at £8,754 per transaction. By reducing the data fields, we anticipate a corresponding 40% reduction in this cost. Given that there are 533 CLOs under management by UK CLO managers, this reform is expected to deliver a total market-wide cost saving of £1.87m year.

**Table 15: Designing more appropriate underlying exposure template for CLOs**

|  | Central est. (£) | Lower bound (£) | Upper bound (£) |
|--|------------------|-----------------|-----------------|
| Annual cost of producing underlying exposures Annex 4 template for European CLOs                       | 8,754            | 4,377           | 17,508          |
| Number of CLOs managed by UK CLO managers  | 533              |                 |                 |
| Proportional reduction in data fields required   | 40%              |                 |                 |
| Annual market wide cost savings from designing more appropriate underlying exposure templates for CLOs | 1,870,000        | 930,000         | 3,730,000       |

### **Cease requiring ABCP templates**

- 118.** As part of our proposals to reduce regulatory reporting requirements, we will cease requiring templates for ABCPs.
- 119.** ABCP transactions are private. Although we have estimated the size of the UK ABCP market earlier in this paper, we do not have reliable cost estimates for compliance with the current reporting requirements for these types of securitisations. As a result, it is not reasonably practicable to quantify the impact of our proposal to cease requiring templates for ABCP transactions. Nonetheless, the removal of these requirements will deliver meaningful cost reductions for all affected firms.

### **Cease requiring investor report templates**

- 120.** We will no longer prescribe the specific template to be provided for reporting to investors because we understand this has not generally been used as much as expected since the requirement was introduced. We understand that most manufacturers already have separate processes to update investors on their securitisations. We consider that this will result in the elimination of this cost for most firms.
- 121.** We estimated the annual cost of producing this report as £8.3k. Taken across the 382 outstanding public securitisations, this results in a market wide cost saving of £3.18m annually.

**Table 16: Delete investor report templates**

|   | Central est. (£) | Lower bound (£) | Upper bound (£) |
|---|------------------|-----------------|-----------------|
| Annualised cost of producing investor report templates                  | 8,337            | 4,168           | 16,674          |
| Total number of outstanding public securitisations                      | 382              |                 |                 |
| Annual market wide cost savings from deleting investor report templates | 3,180,000        | 1,590,000       | 6,370,000       |

**Cease requiring inside information & significant event templates**

- 122.** We propose to cease requiring submission of the inside information & significant event templates (Annex 14 for Non-ACBP securitisations and Annex 15 for ABCP securitisations). By removing this requirement, we intend to make the transparency reporting regime more proportionate and less prescriptive for manufacturers. This change also reduces duplicative disclosures, such as those required under the Market Abuse Regulation.
- 123.** We seek to estimate the savings from this proposal by adjusting the savings we estimated for investor report templates. The inside information & significant event templates have around 3.8 times the number of fields to complete than the investor report templates. We assume that the effort required to complete each field is similar between the investor report templates and inside information & significant event templates. Hence, the cost savings are 3.8 times greater. This implies that the costs savings are on average £31,700. Taken across the 382 outstanding public securitisations, this results in a market wide cost saving of £12.1m annually.

**Table 17: Cease requiring inside information & significant event templates**

|  | Central est. (£) | Lower bound (£) | Upper bound (£) |
|--|------------------|-----------------|-----------------|
| Annualised cost of producing inside information & significant event templates                            | 31,681           | 15,840          | 63,361          |
| Total number of outstanding public securitisations   | 382              |                 |                 |
| Annual market wide cost savings from ceasing to require inside information & significant event templates | 12,100,000       | 6,050,000       | 24,200,000      |

## ***Remove the more prescriptive aspects of the rules***

- 124.** Investors in securitisations will benefit from a reduction in the costs of complying with our revised due diligence rules. Although we will still require each investor to conduct robust due diligence to assess the risk of each securitisation investment, we will no longer prescribe the way to do it. This proposal will allow firms to adapt their processes and make them proportionate to the risk involved. As such, we expect our proposals to reduce both the one-off costs of performing due diligence when initially investing in a securitisation, as well as the ongoing recurring costs associated with the ongoing due diligence of that product.
- 125.** To quantify this benefit, we have considered the impact of our proposals for solo-regulated firms, using the MiFID dataset on investors described in the market section earlier in this paper. Then, we combine this with the estimates for the one-off and recurring cost per transaction for each investor and the percentage reduction in costs by shifting to a less prescriptive regime. These estimates were derived from responses to the EC consultation described above.

**Table 18: Cost savings to investors from removing the more prescriptive due diligence regime**

|  | Central est. (£) | Lower bound (£) | Upper bound (£) |
|--|------------------|-----------------|-----------------|
| One-off costs, annualised  |                  |                 |                 |
| One-off cost per transaction in relation to due diligence                            | 31,572           | 1,000           | 83,370          |
| Average number of unique transactions per year, last 8 years                         | 214              |                 |                 |
| Reduction in one off costs related to due diligence (%)                              | 30.33%           | 10.00%          | 50.00%          |
| Annualised reduction in costs to investors from reduced one off costs                | 2,050,000        | 20,000          | 8,910,000       |
| Recurring costs, annual  |                  |                 |                 |
| Annual recurring cost per transaction in relation to due diligence                   | 10,977           | 556             | 37,516          |
| Total number of unique transactions, last 8 years                                    | 1,710            |                 |                 |
| Reduction in recurring costs related to due diligence (%)                            | 31.43%           | 14.00%          | 44.00%          |
| Annual reduction in costs to investors from reduced recurring costs                  | 5,900,000        | 130,000         | 28,230,000      |
| Total annual cost savings to investors from a less prescriptive due diligence regime | 7,950,000        | 150,000         | 37,140,000      |

- 126.** By removing the more prescriptive aspects of our due diligence rules for investors in securitisation, we expect an overall cost reduction to solo-regulated investors of £7.95m annually.
- 127.** Additionally, we expect benefits to accrue to investors in private securitisations including CLOs from reduced due diligence compliance costs. However, we do not have sufficient data on the number of annual buyer transactions for these markets to estimate the size of this benefit to firms.

***No longer require investors to verify that a manufacturer has adhered to UK standards or UK-like standards***

- 128.** We propose to remove the requirement for investors to verify that the manufacturer of a securitisation has complied with the relevant UK provisions or similar standards. Instead of verifying a manufacturer's compliance with the risk retention requirements, institutional investors will need to satisfy themselves that a sufficient alignment of commercial interest exists between themselves and that manufacturer. This change will enable investors to focus their due diligence on assessing the substantive risks associated with securitised exposures, rather than on confirming regulatory compliance by manufacturers. By shifting the emphasis from verification to risk assessment, we expect to reduce verification costs, lower barriers to entry (particularly for smaller market participants), and decrease familiarisation costs for new entrants. Overall, this will result in a more proportionate and efficient due diligence regime for investors, enabling them to access products, such as U.S. CLOs, currently precluded to them. We have not quantified the benefits arising from these proposals due to lack of data, but we are of the view that they could be material.

***Remove the expectation on investors to conduct specific due diligence for STS securitisations***

- 129.** We propose to remove the requirement for investors to verify compliance with the criteria for STS securitisations. This does not remove the requirement for investors to satisfy themselves that they have assessed the risks of that securitisation, but changes the emphasis, especially for those investors that do not derive any regulatory benefit from buying an STS securitisation.
- 130.** This change will streamline the due diligence process, ensuring that investors are not subject to unnecessary or duplicative obligations when investing in STS transactions. We have not quantified this benefit due to a lack of data on costs to investors in conducting due diligence for STS securitisations specifically.

**Indirect benefits**

- 131.** The previous section has outlined how our proposals will reduce compliance costs for both manufacturers and investors. As a result, originators and investors who may have previously been deterred from the securitisation market due to high costs, will be more likely to engage in the market. We expect this to lead to an increase both in new

securitisation issuance by manufacturers and investment in this market by a broader range of investors.

- 132.** By providing more flexibility in how compliance is performed, we consider our proposals have the potential to improve market outcomes and contribute to deepening the UK securitisation market. Manufacturers will face lower costs in complying with the transparency requirements of SECN, enabling a higher volume of transactions at a lower marginal cost and hence shifting the supply curve outwards. At the same time, investors will find it easier to participate due to lower costs of complying with the due diligence provisions of SECN, shifting the demand curve outwards. These changes should reinforce each other as investor appetite grows, liquidity in the securitisation market will improve, and greater liquidity will incentivise further issuance.
- 133.** There is considerable empirical literature demonstrating that higher liquidity is related to lower asset returns. For example, see [Amihud and Mendelson \(2006\)](#). This is because investors do not need to be compensated for the higher costs they incur in trading illiquid or less liquid assets. Consequently, increased liquidity will benefit investors, thus lowering financing costs for manufacturers.
- 134.** It is not reasonably practicable to estimate the market wide impact of this effect with precision. Any increase in the volume of securitisation will depend on the new equilibrium between originators and investors that may arise following the proposed reforms. In the EC data collection, one respondent suggested that they expect a 20-30% increase in securitisation volume from streamlining public templates and introducing simplified private template reporting to SRs. This would imply a £10-15 billion of new securitisation issuance each year. While we don't necessarily expect such a change in the market, it shows that the indirect benefits could dwarf the direct benefits we have estimated.
- 135.** Additionally, we propose allowing the L-shaped risk retention modality, which is a hybrid of two existing permitted modes. Manufacturers will gain flexibility in structuring transactions to meet both regulatory requirements and preferences. This flexibility can enhance the attractiveness of UK-originated securitisations in both UK and international markets where L-shaped risk retention is already permitted.

### ***Benefits to manufacturers***

- 136.** The reduction in compliance costs resulting from our proposals translates directly into lower transaction costs for manufacturers. We have estimated the annual market wide impact for our transparency proposals at £20.76m. Relative to total average annual issuance size of £46 billion, the proposals can improve the margin for manufacturers by c.4.51 basis points. While this may appear modest in percentage terms, it represents a significant uplift for manufacturers, particularly for smaller or less frequent manufacturers.
- 137.** As direct compliance costs decrease, manufacturers will increasingly securitise their assets. By transforming illiquid assets into cash, manufacturers will strengthen their balance sheet. This enhanced liquidity enables firms to respond more effectively to economic shocks, supporting systemic resilience across the market.

- 138.** The potential reduction in funding costs frees up capital for manufacturers to invest in new, productive activities. This reallocation of resources fosters innovation and growth, amplifying the positive impact on the broader economy. The ability to streamline balance sheets further incentivises participation in the securitisation market, encouraging a more diverse range of manufacturers.
- 139.** By transferring risk to investors, manufacturers become less risky counterparties, which can lead to further reductions in funding costs and promote more efficient capital allocation throughout the financial system. Collectively, these effects support a deeper, more competitive securitisation market, ultimately benefiting both manufacturers and investors through improved risk-adjusted returns and more effective portfolio management (Franke & Krahnen, 2008).

### ***Benefits to investors***

- 140.** We estimated that investors could potentially save £31,572 in one-off costs and £10,977 in annual ongoing costs per transaction on average from our due diligence proposals. While these values will vary depending on a variety of factors, they represent a reduction in the fixed costs of investment in securitisation. Lower due diligence costs will make securitisation more accessible, particularly for smaller investors and smaller transactions, who are currently deterred by high entry costs. As these barriers lower, the pool of potential investors will expand, and the required returns to justify investment in securitisations will decrease. In turn, this should enhance market liquidity, as assets become easier to trade, and investors become less restricted by minimum investment sizes.
- 141.** This reduction in barriers is likely to encourage broader participation in the securitisation market, enabling investors to access a wider range of asset types and structures. With fewer constraints and lower costs, investors can better tailor their exposures to specific risk-return profiles and respond more efficiently to market opportunities. Ultimately, these changes, including allowing exposure to asset classes currently precluded to UK institutional investors, are expected to enhance risk-adjusted returns and support more effective portfolio management, while maintaining appropriate standards for due diligence and risk assessment.

### ***Costs***

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- 142.** In this section, we detail the direct one-off and ongoing costs we expect firms to face because of our proposals. These costs include:
- Familiarisation and legal costs for manufacturers and institutional investors.
  - Costs for SRs further to our proposals to cease requiring reporting of information to them by manufacturers.

## Familiarisation and legal costs

- 143.** We consider familiarisation and legal review costs to be the direct costs associated with our proposals. On a one-off basis, all firms that are subject to the framework will need to familiarise themselves with the consultation and accompanying legal instruments to understand the changes they may need to make to their business operations.
- 144.** Specifically, we assess these costs against the population of solo-regulated firms that are only authorised by the FCA. We determined the number of affected firms from the lists of investors, originators, sponsors, servicers, and CLO managers. Duplicated firms were removed. In total, we assume that all of 194 firms will be affected by our proposed changes. The SCM categorises these firms as:
- 20 large firms.
  - 81 medium firms.
  - 93 small firms.
- 145.** Our familiarisation cost estimates are based on a consultation paper that is 70 pages in length. The legal review estimates are based on 40 pages of legal text. We use the FCA's standard SCM assumptions, which are outlined in Appendix 1 of our Statement of Policy on Cost Benefit Analyses, to compute the anticipated familiarisation and legal review costs.
- 146.** Total familiarisation costs are estimated at £598k. The one-off costs per firm and total cost calculation are set out in the table below.

**Table 19: Familiarisation and legal cost estimates**

| Cost to firms          | Large    | Medium | Small |
|------------------------|----------|--------|-------|
| One-off costs per firm | £11,850  | £3,580 | £760  |
| Total number of firms  | 20       | 81     | 93    |
| Total costs            | £598,000 |        |       |

## Rule changes consequential to the removal of the registration regime for Securitisation Repositories

- 147.** The ceasing of the requirement to report information to regulated SRs aims to reduce the regulatory burden on manufacturers. We propose to change our rules to remove obligations on SRs to collect information and the obligations on manufacturers to submit information to SRs. These are consequential and subject to changes in legislation. The benefits of this proposal are discussed above. Here we discuss the potential costs the proposals may entail for the SRs themselves, who may lose the ongoing revenues from mandatory reporting fees.
- 148.** There are 2 SRs registered to operate in the UK. In our benefits section, we estimated the costs saved by manufacturers to be £3,240,000 per annum. This estimate includes both the direct costs manufacturers incur to use the services of SRs and the fees paid

to SRs themselves. After accounting for the operational costs of SRs, the remainder of these fees represent the profits earned by SRs from providing their services. Based on FCA data, we estimate the ongoing loss in profitability for SRs will be, on average, less than £100k per year, for both firms combined.

## Indirect costs

### ***Reduction in data available to investors***

- 149.** Ceasing to require reporting of information to regulated SRs indirectly impacts investors in securitisations, who may lose access to a single, standardised, and compulsory data source. Without a centralised repository, market participants must rely on data received from manufacturers, third-party commercial providers, and other services.
- 150.** However, we consider that the indirect cost to market participants is limited. Manufacturers will still be required to give access to the relevant information to their investors, albeit not on a centralised nor necessarily standardised manner. In addition, investors have access to commercial data providers or other types of regulatory returns (like those from the Bank of England) to complement their analysis. Finally, we expect that some manufacturers will continue to use SRs to report their data to investors on a voluntary basis. We expect market practice to establish the most efficient way to distribute and access the information that we continue to require manufacturers to provide their investors.

## **Wider economic impacts, including on secondary objective**

- 151.** Our publication "Secondary international competitiveness and growth objective" (SICGO) explains how we will pursue this objective. By increasing credit availability, improving market liquidity and risk management, lowering funding costs, and fostering efficient allocation of capital, the proposals will encourage UK economic growth in the medium-to-long-term.
- 152.** By lowering the regulatory burden on both manufacturers and investors, we expect the key impact of these changes to be an increase in credit supply. Lower costs and lower complexity for manufacturers is expected to encourage more securitisation issuance, freeing up the balance sheets of banks and other intermediaries to originate more loans, especially to households and small businesses. As the supply of credit expands and investors are more willing to invest in securitisations, the interest rates on underlying loans could decrease, lowering the cost of capital in the real economy.
- 153.** Securitisation enables trading of otherwise illiquid assets, like mortgages and auto loans. By making these assets tradable, securitisation improves liquidity for underlying assets, enhancing overall liquidity in capital markets. The process also allows for originators to transfer risk from their own balance sheets to investors who are better placed to manage them. Diversification of risk can also contribute to a more stable financial system.

- 154.** A healthier securitisation market can foster more efficient capital allocation. The process can create new investment opportunities and channel capital towards productive uses that would have otherwise been difficult to access.
- 155.** In addition to growth, the proposals can support the international competitiveness of the UK financial services industry, by expanding the investible universe for investors and easing the regulatory burden faced by manufacturers, making it more attractive for manufacturers and investors to transact in the UK.
- 156.** While the theoretical link between securitisation and economic growth is described above, quantifying the impact of securitisation on real economic output and growth is methodologically challenging.

## Risks and uncertainties

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- 157.** Securitisation is an efficient tool in reducing credit rationing by creating investible securities from relatively illiquid loans. However, if not adequately regulated, it can increase systemic risk as during the GFC. During the GFC, lenders, particularly in the U.S., lowered their lending standards as they could subsequently sell the loans on to investors through securitisation. The size of the market and the misperceptions of credit quality meant that a shock to property prices cascaded through the financial system, and then the real economy.
- 158.** While the framework is largely effective at mitigating these market failures and associated risks, we have found that aspects of the rules create significant costs without clear benefits or benefits that are not commensurate to the costs. Consequently, we consider that removing ineffective and burdensome requirements will not materially increase systemic risk.
- 159.** However, some of our proposed changes may, theoretically, at the margin, increase risk of a systemic event within the UK securitisation market. This is because by giving more flexibility to manufacturers in the way they provide information to their investors, there is a risk that the amount of information supplied to the market may be lower or of a lower quality. Similarly, there may be a risk that a more principles-based due diligence approach could mean risk assessments performed by certain investors may be of lower quality.
- 160.** As is the case with other initiatives that shift to a more principles-based regulatory approach, one way to mitigate these risks is increasing our market intelligence and supervisory efforts to understand the effect of our proposed changes.
- 161.** In identifying how interventions in this market can support both FCA strategic and operational objectives, we consider our proposals from a perspective of "rebalancing risk." This approach recognises the important role risk-taking plays in driving innovation and delivering benefits for consumers in financial services markets, whilst also reducing harm where needed. Therefore, in "rebalancing risk," we are given scope to explore some benefits that could outweigh harms. This approach ensures we make balanced, risk-informed decisions that reflect the real-world complexity of dynamic markets, and allow us to be a smarter, more adaptive regulator.

- 162.** We do not think that our proposals would materially affect the quality of information available for investors in UK securitisations. As discussed above, some of the reporting requirements are ineffective and of little use to market participants so removing them will not deteriorate the volume or quality of effective information in the market. In addition, for UK investors investing in UK securitisations, we believe any potential negative impact will be very limited while our proposals would enable the removal of some of the costs.
- 163.** Our proposals on risk retention are more likely to increase risk to investors when investing in foreign assets. The key change is allowing investment in U.S. CLOs where risk retention does not apply. We think that the benefits to investors from allowing them to invest in these assets outweigh any additional risks that arise.
- 164.** The risk retention rules are designed to align the interests of manufacturers and investors in securitisation. However, we do not have a clear appreciation for the effectiveness of this mechanism when it comes to CLOs and, in the context of this paper, are soliciting the market's views on whether we should consider targeted exemptions for UK-managed CLOs from the SECN requirements. We continue to request alignment of interest as a necessary investment condition, but we propose to give investors the opportunity to consider whether alignment of interest can be achieved through another means. Accordingly, we judge that allowing UK investors to participate in this market will not appreciably increase systemic risk.
- 165.** On the benefits side, U.S. CLOs are an important asset class, and UK investors are currently excluded from investing in some CLOs which would positively enhance their portfolios (through greater diversification and superior risk adjusted returns).
- 166.** While our proposals would allow UK investors to fully participate in the U.S. CLO market more widely, we will still require UK institutional investors to satisfy themselves, prior to investing, that the originator, sponsor or original lender maintains, on an ongoing basis, a sufficient and appropriate material alignment of commercial interest in the performance of the securitisation prior to investing. Non-exhaustive guidance on how this alignment of interest between the manufacturer and the investor can be achieved is then detailed in guidance. In the absence of this alignment of interest, UK institutional investors would be prohibited from investing.
- 167.** This principles-based approach is intended to emphasise to investors well-known features of investment in securitisation and should mitigate the risk of mispricing or adverse selection while giving agency to sophisticated institutional investors to gain exposure to a wider investible universe. These requirements will address any residual risk.

## Monitoring and evaluation

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- 168.** We plan to monitor the impact of our proposals if implemented. We expect to observe an increase in securitisation issuance and investment. Key indicators will include the number and type of securitisation issuances, investor take up, and trends in transaction structures following implementation.

- 169.** When appropriate, we will supplement this monitoring with research to evaluate whether the reforms are achieving their intended objectives. This includes whether these reforms have reduced unnecessary regulatory burdens and support economic growth and the international competitiveness of UK markets.
- 170.** Findings from this monitoring and evaluation will inform any future policy adjustments to ensure the UK securitisation framework is effective and proportionate.

## Consultation with the FCA Cost Benefit Analysis Panel

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- 171.** We have consulted the independent CBA Panel in the preparation of this CBA in line with the requirements of s138IA(2)(a) the Financial Services and Markets Act (FSMA) 2000. A summary of the main group of recommendations provided by the CBA Panel and the measures we took in response to Panel advice is provided in the table below. In addition, we have undertaken further changes based on wider feedback from the CBA Panel on specific points of the CBA. The CBA Panel publishes a summary of their feedback on their website, which can be accessed [here](#).

**Table 20: CBA Panel feedback and our response**

| Panel feedback   | Response  |
|--|---|
| <p>Strengthen the treatment of systemic and downside tail risks. The CBA notes that the existing regulatory regime for securitisation was introduced in the wake of the Global Financial Crisis in order to mitigate systemic financial risks and potential tail events. The CBA would therefore benefit from a clearer and more prominent explanation of what impact the proposed changes will have on these risks, and how supervisory oversight will monitor and mitigate them. If possible, the CBA should include indicative or scenario-based assessments of such downside risks though any assessment should be carefully worded to avoid implying causality or certainty where the evidence does not support it.</p> | <p>The treatment of systemic financial risks has been revised across the Executive Summary and the Risks and Uncertainties sections. In the Risks and Uncertainties section we explain further why amendments to transparency and due diligence rules, which form the bulk of the changes, will not have increased systemic risks. In both the Risks and Uncertainties section and the Executive Summary we address how allowing UK firms to invest in U.S. CLOs could increase systemic risk and present evidence as to how this risk is mitigated. Ultimately, this evidence demonstrated the relatively minor impact the proposals would have on systemic risk, and hence scenario analysis would not have been proportionate.</p> |
| <p>Improve clarity and presentation of the costs and benefits. The Panel commends the inclusion of a clear and well-structured Executive Summary. To improve transparency further, the CBA should clarify how the summary of costs and benefits relates to the detailed tables later on, ensuring units are consistent across the tables and signposting indirect and growth-related benefits more prominently.</p>  | <p>The CBA has been revised in response to this feedback. All units across the CBA have been standardised and clearly labelled as either '£' or '£m,' and a stronger signpost of the costs ensures that the summary is representative of the later analysis.</p>  |
| <p>Expand the assessment of policy options. The CBA's options analysis should be completed by either including a "do-nothing" option for the transparency proposals or explaining why it is omitted. The CBA should recognise explicitly that flexibility in implementation timelines is an important mechanism for mitigating costs and disruption to firms.</p>  | <p>We now explain why a "do nothing" option was not considered as part of the transparency proposals (see paragraph 59). Further, we explained how, in the interest of flexibility of implementation, we will accept the EU templates as an alternative for those UK manufacturers who wish to tap EU markets (see paragraph 72).</p>   |

**Question 47: Do you have any comments on our cost benefit analysis?**

## Annex 3

# Compatibility Statement

## Compliance with legal requirements

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- 1.** This Annex records the FCA's compliance with a number of legal requirements applicable to the proposals in this consultation, including an explanation of the FCA's reasons for concluding that our proposals in this consultation are compatible with certain requirements under the Financial Services and Markets Act 2000 (FSMA).
- 2.** When consulting on new rules, the FCA is required by section 138I(2)(d) FSMA to include an explanation of why it believes making the proposed rules (a) is compatible with its general duty, under section 1B(1) FSMA, so far as reasonably possible, to act in a way which is compatible with its strategic objective and advances one or more of its operational objectives, (b) so far as reasonably possible, advances the secondary international competitiveness and growth objective, under section 1B(4A) FSMA, and (c) complies with its general duty under section 1B(5)(a) FSMA to have regard to the regulatory principles in section 3B FSMA. The FCA is also required by s 138K(2) FSMA to state its opinion on whether the proposed rules will have a significantly different impact on mutual societies as opposed to other authorised persons.
- 3.** This Annex also sets out the FCA's view of how the proposed rules are compatible with the duty on the FCA to discharge its general functions (which include rule-making) in a way which promotes effective competition in the interests of consumers (section 1B(4)). This duty applies in so far as promoting competition is compatible with advancing the FCA's consumer protection and/or integrity objectives.
- 4.** In addition, this Annex explains how we have considered the recommendations made by the Treasury under s. 1JA FSMA about aspects of the economic policy of His Majesty's Government to which we should have regard in connection with our general duties.
- 5.** This Annex includes our assessment of the equality and diversity implications of these proposals.
- 6.** Under the Legislative and Regulatory Reform Act 2006 (LRRA) the FCA is subject to requirements to have regard to a number of high-level 'Principles' in the exercise of some of our regulatory functions and to have regard to a 'Regulators' Code' when determining general policies and principles and giving general guidance (but not when exercising other legislative functions like making rules). This Annex sets out how we have complied with requirements under the LRRA.

## The FCA's objectives and regulatory principles: Compatibility statement

- 7.** The proposals set out in this consultation are primarily intended to advance the FCA's operational objective of enhancing integrity. They are also relevant to the FCA's competition objective.

Our proposals are also relevant to the FCA's strategic objective of ensuring that relevant markets function well because they seek to ensure that requirements for manufacturers of securitisations and investors in securitisations are clear and proportionate. The measures we propose aim to encourage a more effective and efficient market for securitisations which, in turn, can support the funding of the UK economy and the competitiveness of the UK financial services industry. For the purposes of our strategic objective, the meaning of "relevant markets" is set out in s. 1F FSMA.

- 8.** The proposals in this paper aim to remove or minimise frictions around issuance and investment in securitisations, while ensuring adequate guardrails for the protection of investors
- 9.** A more flexible transparency regime for manufacturers and the streamlining of the due diligence requirements for investors should contribute to the reduction in costs, while ensuring adequate investor protection, associated with manufacturing and investing in securitisations.
- 10.** Our proposals allow more flexibility to achieve the alignment of interest between manufacturers and investors. This has the potential to expand the investible universe of UK institutional investors and provide their principals with better risk adjusted returns, thus strengthening the competitiveness of UK buy-side firms.
- 11.** In this sense, we consider these proposals support the FCA's secondary objective in advancing competitiveness and growth. Moreover, our proposals also seek to facilitate the recommendations outlined in the Governments 2024 remit letter, namely supporting sustained economic growth.
- 12.** In preparing the proposals set out in this consultation, the FCA has had regard to the regulatory principles set out in s.3B FSMA.
- 13.** Our proposals are intended to ensure that our rules and guidance in relation to the securitisation framework enable firms to interact with us in the most efficient way possible. By clarifying our expectations and simplifying the rules' framework, our proposals are intended to reduce the need for supervisory interventions.

### **The principle that a burden or restriction should be proportionate to the benefits**

- 14.** We have sought to be proportionate in our approach to rules. Both by streamlining the transparency requirements applicable to those who manufacture securitisations and by simplifying the rules on due diligence for institutional investors. We have undertaken a cost-benefit analysis which is included in Annex 2 of this consultation paper. Our cost benefit analysis also highlights the proposed change to stop mandating by regulation that manufacturers must report to SRs.

**The need to contribute towards achieving compliance by the Secretary of State with section 1 of the Climate Change Act 2008 (UK net zero emissions target) [and section 5 of the Environment Act 2021 (environmental targets)]]**

- 15.** This principle is not relevant to our proposals.

**The general principle that consumers should take responsibility for their decisions**

- 16.** Our proposals do not change the protections available to retail clients who may wish to invest in securitisation products.

**The responsibilities of senior management**

- 17.** We do not consider that our proposals are inconsistent with this principle. The proposals aim to make our rules less prescriptive. We still expect the management body of UK institutional investors to be aware of the material risks arising from the securitisation position, if any.

**The desirability of recognising differences in the nature of, and objectives of, businesses carried on by different persons including mutual societies and other kinds of business organisation**

- 18.** We do not consider that our proposals are inconsistent with this principle.

**The desirability of publishing information relating to persons subject to requirements imposed under FSMA, or requiring them to publish information**

- 19.** This principle is not relevant to our proposals.

**The principle that we should exercise of our functions as transparently as possible**

- 20.** By explaining the rationale for each of our proposals and the anticipated outcomes, the FCA has had regard to this principle.

- 21.** We do not regard our proposals as being relevant to the need for the FCA to have regard to the importance of taking action intended to minimise the extent to which it is possible for a business carried on (i) by an authorised person or a recognised investment exchange; or (ii) in contravention of the general prohibition, to be used for a purpose connected with financial crime (as required by s 1B(5)(b) FSMA).

**Further specified matters to which the FCA must have regard**

- 22.** Regulation 8 of the UK SR 2024 requires the FCA and the PRA to have regard to the "coherence of the overall framework for the regulation of securitisation" when making rules relating to securitisation. We have had regard to this, and our proposals are consistent with this principle.

## Expected effect on mutual societies

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23. The FCA does not expect the proposals in this Consultation Paper to have a significantly different impact on mutual societies.

## Compatibility with the duty to promote effective competition in the interests of consumers

---

24. In preparing the proposals as set out in this consultation, we have had regard to the FCA's duty to promote effective competition in the interests of consumers. Insofar as the proposed changes results in broader participation of manufacturers and investors and support funding to the UK economy, consumers would be able to benefit from those positive impacts.

## Environmental, social & governance considerations

25. In developing this Consultation Paper, we have considered the environmental, social and governance (ESG) implications of our proposals and our duty under ss. 1B(5) and s.3B(1) (c) of FSMA to have regard to contributing towards the Secretary of State achieving compliance with the net-zero emissions target under section 1 of the Climate Change Act 2008 [and environmental targets under s. 5 of the Environment Act 2021]. Overall, we do not consider that the proposals are relevant to contributing to those targets. We will keep this issue under review during the course of the consultation period and when considering whether to make the final rules.

## Equality and diversity

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26. We are required under the Equality Act 2010 in exercising our functions to 'have due regard' to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by or under the Act, advance equality of opportunity between persons who share a relevant protected characteristic and those who do not, to and foster good relations between people who share a protected characteristic and those who do not.
27. As part of this, we ensure the equality and diversity implications of any new policy proposals are considered. Overall, we do not consider that the proposals materially impact any of the groups with protected characteristics under the Equality Act 2010. We will continue to consider the equality and diversity implications of the proposals during the consultation period and when making the final rules.

## Legislative and Regulatory Reform Act 2006 (LRRA)

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- 28.** We have had regard to the principles in the LRRA for the parts of the proposals that consist of general policies, principles or guidance.
- **Transparent** – Our proposals build on market feedback, including that received as part of CP 23/17 in 2023. We will continue to engage with the regulated community.
  - **Accountable** – We are consulting on proposals and will publish final rules in our Policy Statement (PS) in 2027 after considering all feedback received. We are acting within our statutory powers, rules and processes.
  - **Proportionate** – Our proposals enhance the proportionality of the securitisation framework by empowering manufacturers and investors to conduct the securitisation business more in sync with the market practices and the needs of their clients. The CBA sets out further details on the costs and benefits of our proposals.
  - **Consistent** – Our proposals would apply in a consistent manner across firms engaging in securitisation.
  - **Targeted** – Our proposals are targeted at improving the UK's securitisation framework and will enhance our ability for targeted engagement of our resources.
  - **Regulators' Code** - Our proposals are carried out in a way that supports firms to comply and grow. We achieve this through our consideration of their feedback via this CP and refining our proposals where necessary. Our CP, CBA, draft instrument, accompanying annexes, public communications and communications with firms are provided in a simple, straightforward, transparent and clear way to help firms meet their responsibilities.

## Annex 4

# Abbreviations used in this paper

| Abbreviation  | Description  |
|---------------|--|
| <b>ABCP</b>   | Asset-backed Commercial Paper                            |
| <b>ABS</b>    | Asset-Backed Securities                                  |
| <b>AIFM</b>   | Alternative Investment Fund Managers                     |
| <b>AIFMD</b>  | Alternative Investment Fund Managers Directive           |
| <b>CBA</b>    | Cost Benefit Analysis                                    |
| <b>CDO</b>    | Collateralised Debt Obligation                           |
| <b>CLO</b>    | Collateralised Loan Obligations                          |
| <b>CMBS</b>   | Commercial Mortgage-Backed Securities                    |
| <b>CP</b>     | Consultation Paper                                       |
| <b>CRR</b>    | Capital Requirements Regulation                          |
| <b>CTP</b>    | Correlation Trading Portfolios                           |
| <b>DTR</b>    | Disclosure, Guidance and Transparency rules              |
| <b>EANDCB</b> | Equivalent Annual Net Direct Cost to Business            |
| <b>EC</b>     | European Commission                                      |
| <b>ESMA</b>   | European Securities and Markets Authority                |
| <b>EU</b>     | European Union   |
| <b>EU SR</b>  | EU Securitisation Regulation (Regulation (EU) 2017/2402) |
| <b>FSMA</b>   | Financial Services and Markets Act                       |
| <b>GFC</b>    | Global Financial Crisis                                  |
| <b>IC</b>     | Interest Coverage  |

| Abbreviation        | Description  |
|---------------------|--|
| <b>LEI</b>          | Legal Entity Identifier                                      |
| <b>MAR</b>          | Market Abuse Regulation                                      |
| <b>MGS</b>          | Mortgage Guarantee Scheme                                    |
| <b>MiFID</b>        | Markets in Financial Instruments Directive                   |
| <b>MTF</b>          | Multilateral Trading Facility                                |
| <b>NPV</b>          | Net Present Value  |
| <b>OC</b>           | Over collateralisation                                       |
| <b>PRA</b>          | Prudential Regulation Authority                              |
| <b>PRM</b>          | PRM Admission to Trading on a Regulated Market               |
| <b>PS</b>           | Policy Statement   |
| <b>PV</b>           | Present Value  |
| <b>RMBS</b>         | Residential Mortgage-Backed Securities                       |
| <b>SCM</b>          | Standardised Cost Model                                      |
| <b>SECN</b>         | Securitisation Sourcebook                                    |
| <b>SI</b>           | Statutory Instrument   |
| <b>SICGO</b>        | Secondary International Competitiveness and Growth Objective |
| <b>SME</b>          | Small and medium-sized Enterprise                            |
| <b>SPV</b>          | Special Purpose Vehicle                                      |
| <b>SRs</b>          | Securitisation Repositories                                  |
| <b>SRT</b>          | Significant Risk Transfer                                    |
| <b>SSPE</b>         | Securitisation Special purpose entities                      |
| <b>STS</b>          | Simple, Transparent and Standardised                         |
| <b>SYSC</b>         | Senior Management Arrangements, Systems and Controls         |
| <b>the Treasury</b> | HM Treasury  |

| Abbreviation      | Description   |
|-------------------|---|
| <b>UCITSD</b>     | Undertakings for Collective Investment in Transferable Securities Directive |
| <b>UK</b>         | United Kingdom  |
| <b>UK SR 2018</b> | UK Securitisation Regulations 2018 (SI 2018/1288)                           |
| <b>UK SR 2024</b> | The Securitisation Regulations 2024 (SI 2024/102)                           |
| <b>U.S.</b>       | United States of America  |
| <b>WAL</b>        | Weighted average life   |
| <b>WAS</b>        | Weighted average spread   |
| <b>WBS</b>        | Whole business securitisations  |
| <b>XML</b>        | Extensible mark-up language   |

## Appendix 1

# Draft Handbook text

## **SECURITISATION SOURCEBOOK (AMENDMENT) INSTRUMENT 2026**

### **Powers exercised**

- A. The Financial Conduct Authority (“the FCA”) makes this instrument in the exercise of the powers and related provisions in or under:
- (1) the following sections of the Financial Services and Markets Act 2000 (“the Act”):
- (a) section 137A (The FCA’s general rules);
  - (b) section 137T (General supplementary powers);
  - (c) section 139A (Power of the FCA to give guidance); and
  - (d) paragraph 23 (Fees) of Part 3 (Penalties and fees) of Schedule 1ZA (The Financial Conduct Authority); and
- (2) the following provisions of the Securitisation Regulations 2024 (SI 2024/102):
- (a) regulation 5 (FCA rules);
  - (b) regulation 22 (Power of FCA to make rules in relation to securitisation repositories);
  - (c) regulation 34 (Due-diligence requirements of small registered UK AIFMs as institutional investors); and
  - (d) paragraph 10 (Directions given under regulation 25 of Securitisation Regulations 2018) of Schedule 3. (Transitional provisions)
- B. The rule-making powers listed above are specified for the purposes of section 138G(2) (Rule-making instruments) of the Act.

### **Commencement**

- C. This instrument, including recital F below, comes into force on [date].

### **Amendments to the Handbook**

- D. The modules of the FCA’s Handbook of rules and guidance listed in column (1) below are amended in accordance with the Annexes to this instrument listed in column (2).

| (1)                              | (2)     |
|----------------------------------|---------|
| Glossary of definitions          | Annex A |
| Fees Manual (FEES)               | Annex B |
| Securitisation sourcebook (SECN) | Annex C |

### **Notes**

- E. In the Annexes to this instrument, the notes (indicated by “*Editor’s note:*”) are included for the convenience of the reader but do not form part of the legislative text.

### **Revocation of the Direction on private notifications**

- F. The FCA revokes the Direction “Reporting of private securitisations”, made jointly with the Prudential Regulation Authority under regulation 25 of the Securitisation Regulations 2018, on 31 January 2019.

**Citation**

- G. This instrument may be cited as the Securitisation Sourcebook (Amendment) Instrument 2026.

By order of the Board

[*date*]

## Annex A

### Amendments to the Glossary of definitions

In this Annex, underlining indicates new text and striking through indicates deleted text, unless otherwise stated.

Delete the following definition. The text is not shown struck through.

*securitisation repository* (in *FEES* and in *SECN*) has the meaning in regulation 3(1) of the *Securitisation Regulations 2024*.

## Annex B

### Amendments to the Fees Manual (FEES)

In this Annex, underlining indicates new text and striking through indicates deleted text, unless otherwise stated.

#### 3.2      **Obligation to pay fees**

...

Table of application, notification, vetting and other fees payable to the FCA

3.2.7      R

| Part 1A: Application, notification and vetting fees  |  |                                      |
|--|--|--------------------------------------|
| (1) Fee payer  | (2) Fee payable (£)<br>by reference to the<br>pricing category in<br><i>FEES</i> 3 Annex<br>1AR.   | Due date                             |
| ...  | ...  | ...                                  |
| (zzf) UK-based applicants for registration as a <i>trade repository</i> ; a <i>securitisation repository</i> ; or a third country applicant seeking recognition as a <i>trade repository</i> . | <p>5,000</p> <p><del>Applicants for registration as a <i>trade repository</i> who already hold registration as a <i>securitisation repository</i>, or vice versa, will receive a 50% discount on the relevant application fee.</del></p> <p>Applicants for registration as a <i>trade repository</i> to carry on activity for the purposes of <i>UK SFT</i> who already hold registration as a <i>trade repository</i> under <i>EMIR</i> or vice versa, will receive a 50% discount on the</p> | On the date the application is made. |

|     |                           |     |
|-----|---------------------------|-----|
|     | relevant application fee. |     |
| ... | ...                       | ... |

...

**3 Annex 13R Fees payable for registration as a credit rating agency, or trade repository or securitisation repository**

| Application type   | Applicable pricing category in FEES 3 Annex 1AR |
|--|---|
| <i>Credit rating agency</i>  | 5   |
| <i>Trade repository</i>  | 6   |
| Third country <i>firm</i> seeking certification as a <i>credit rating agency</i> | 4   |
| Third country <i>firm</i> seeking recognition of a <i>trade repository</i>       | 5   |
| <i>Securitisation repository</i>   | €   |

**4.2 Obligation to pay periodic fees**

...

**Extension of Time**

**4.2.11 R Table of periodic fees payable to the FCA**

| 1 Fee payer  | 2 Fee payable                            | 3 Due date                 | 4 Events occurring during the period leading to modified periodic fee |
|--|--|----------------------------|---|
| ...  | ...                                      | ...                        | ...   |
| Any UK-based <i>firm</i> registered as a <i>credit rating agency</i> ; a <i>trade repository</i> ; a <i>securitisation repository</i> or any third country <i>firm</i> | The tariff specified in FEES 4 Annex 16R | Within 30 days of the date | Not applicable  |

|   |     |                |     |
|---|-----|----------------|-----|
| certified as a <i>credit rating agency</i> or recognised as a <i>trade repository</i> . |     | of the invoice |     |
| ...   | ... | ...            | ... |

...

**4 Annex 16R Periodic fees for credit rating agencies, and trade repositories and securitisation repositories**

This Annex sets out the periodic fees in respect of *credit rating agencies, and trade repositories and securitisation repositories*.

[Editor's note: the following text takes into account the changes proposed in the consultation paper 'Regulatory fees and levies: policy proposals for 2026/27' (CP25/33) as if they were made.]

|  |   |
|--|---|
| Part 1 – Method for calculating the fee for fee-paying credit rating agencies, <u>and</u> trade repositories <u>and</u> securitisation repositories  |   |
| The periodic fee is calculated by identifying the relevant activity group under Part 2 and multiplying the tariff base identified in Part 3 of FEES 4 Annex 16R by the appropriate rates in the table at Part 4. |   |
| Part 2 – Activity groups   |   |
| <b>Activity group</b>  | <b>Fee payer falls into this group if:</b>                                |
| ...  | ...   |
| J.2  | it is a <i>trade repository</i> or recognised trade repository; <u>or</u> |
| J.3  | it is a <i>securitisation repository</i> .                                |

Part 3

This table indicates the tariff base for each fee-block. The tariff base is the means by which the FCA measures the amount of business conducted by a firm.

|   |  |
|---|--|
| ...                                       | ...  |
| J.3<br><i>Securitisation repositories</i> | <b>APPLICABLE TURNOVER</b><br><u>This is the sum of revenues generated from:</u> |

|  |   |
|--|---|
|  | <p>(a) the core functions of centrally collecting and maintaining records of <i>securitisations</i>; and</p> <p>(b) ancillary services that are directly related to centrally collecting and maintaining records of <i>securitisations</i>.</p> <p><u>Ancillary services include:</u></p> <p>(i) direct provision by the <i>securitisation repository</i>;</p> <p>(ii) indirect provision by a company within the <i>securitisation repository's group</i>;</p> <p>(iii) where an entity with which the <i>securitisation repository</i> has concluded an agreement in the context of the trading or post trading chain or business line to cooperate in the provision of services provides the ancillary services.</p> |
|--|---|

| Part 4 – Tariff rates |   |   |
|-----------------------|---|---|
| Fee block             | Activity group                                | Fee payable in relation to the fee year 2025/26                       |
| ...                   | ...   | ...   |
| J.3                   | Registered <i>securitisation repositories</i> | £11.01 per £1k or part £1k subject to a minimum payment of £24,795.00 |

## Annex C

### Amendments to the Securitisation sourcebook (SECN)

In this Annex, underlining indicates new text and striking through indicates deleted text, unless otherwise stated.

#### 1 Introduction

##### 1.1 Application

1.1.1 G (1) The *rules, guidance* and directions in this sourcebook apply to:

...

(e) ~~body corporates applying to be registered as securitisation repositories; [deleted]~~

(f) ~~securitisation repositories; [deleted]~~

(g) ~~trade repositories; [deleted]~~

...

...

#### 2 Requirements on STS securitisations

##### 2.6 Information to be included in the STS notification by the originator or sponsor

2.6.1 R (1) ~~The following information must be included in For securitisations in respect of which the rules in PRM require a prospectus to be drawn up, the STS notification must include the information specified in the relevant template in SECN 2 Annex 1R. The information must be provided in the relevant template in an electronic and machine-readable format:.~~

- (a) ~~if the securitisation is a non ABCP securitisation, the information specified in SECN 2 Annex 1R;~~
- (b) ~~if the securitisation is an ABCP transaction, the information specified in SECN 2 Annex 2R;~~
- (c) ~~for an ABCP programme, the information specified in SECN 2 Annex 3R.~~

- (2) For *securitisations* where the *rules* in *PRM* do not require a prospectus to be drawn up, ~~the information to be included in the *STS notification* pursuant to (1) must be by accompanied by the following: must include the information specified in the relevant template in:~~
- (a) ~~where the *securitisation* is a non *ABCP securitisation*, the information specified in fields STSS9 and STSS10 of *SECN 2 Annex 1R*; or~~
- (b) ~~where the *securitisation* is an *ABCP transaction*, the information specified in fields STSAT9 and STSAT10 of *SECN 2 Annex 2R*; both *SECN 2 Annex 2R* and *SECN 2 Annex 3R*.~~
- (c) ~~for an *ABCP programme*, the information specified in field STSAP9 of *SECN 2 Annex 3R*. [deleted]~~

The information must be provided in the relevant template(s) in an electronic and machine-readable format.

- (3) For the purposes of regulation 10 of the *Securitisation Regulations 2024*, the publication of the *STS notification* ~~for those *securitisations* is limited to the information referred to in *SECN 2.6.1R* submitted in the relevant template in *SECN 2 Annex 1R* or, where it has been provided, *SECN 2 Annex 3R*.~~
- (4) Where the information to be provided pursuant to *SECN 2.6* is not available or is not required due to the application of the transitional provisions in *SECN 14*, the notification must state 'Not applicable due to the application of transitional provisions' in the relevant field or fields of the templates in *SECN 2 Annex 1R*, *SECN 2 Annex 2R* or *SECN 2 Annex 3R*.

#### Additional information

- 2.6.2 R (1) If the documents at *SECN 2.6.2R(2)* include additional information relevant to the *STS notification*, a reference to the relevant parts of those documents may be provided in the 'Additional information' 'Box to complete' column in *SECN 2 Annex 1R*, *SECN 2 Annex 2R* or *SECN 2 Annex 3R*.
- ...

*SECN 2.7* is deleted in its entirety. The deleted text is not shown but the section is marked [deleted] as shown below.

#### 2.7 **Templates for STS Notification [deleted]**

SECN 2 Annex 1, SECN 2 Annex 2 and SECN 2 Annex 3 are deleted in their entirety and replaced with the following. The text is not underlined.

**2 Annex Public templates for STS notifications under SECN 2.6.1R(1) and (2)(a)  
1R**

*[Editor's note: insert link to 'Public templates for STS notifications under SECN 2.6.1R(1) and (2)(a)'.]*

## Non-ABCP securitisation

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME  | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN                 | CONTENT TO BE REPORTED: (If appropriate, include a reference to the relevant sections of the underlying documentation where the information is available)   | ADDITIONAL INFORMATION                                   |
|--------------|--------------------------------------|-------------------------------------|--|--------------------------------------|---|---|--|
| STSS0        |                                      | First contact point                 | N/A (General Information)  | {ALPHANUM-1000}                      | SECN 2.5.1R   | Legal Entity Identifier (LEI) of the entity designated as the first contact point   | Item 3.2 of PRM App 2 Annex 14.3R.                       |
| STSS1        |                                      | Instrument identification code      | N/A (General Information)  | {ISIN}                               | N/A   | Where available, the international security identification code (ISIN) or codes. If no ISIN is available, then any other unique securities code assigned to this securitisation.  | Where available under Item 3.1 of PRM App 2 Annex 14.3R. |
| STSS2        |                                      | 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 PRM App 2 Annex 7.4R.                        |
| STSS3        |                                      | Notification identifier             | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | Where reporting an update, the unique reference number assigned by the FCA to the previously notified STS notification.   | N/A  |
| STSS4        |                                      | Unique identifier                   | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The unique identifier assigned by the reporting entity in accordance with SECN 11.12.1R.  | N/A  |
| STSS5        |                                      | 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        |                                      | Securitisation repository           | N/A (General Information)  | {ALPHANUM-1000}                      | N/A   | Where available, the name of the registered securitisation repository.  | N/A  |
| STSS7        |                                      | Securitisation name                 | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The securitisation name.  | PRM App 2 Annex 7.4R                                     |
| STSS8        |                                      | Country of establishment            | N/A (General Information)  | {COUNTRYCODE_2}                      | Regulations 10 and 13 of the Securitisation Regulations and SECN 2.5.3R | Where available, the country of establishment of the originator(s), sponsor(s), SSPE(s) and original lender(s).   | N/A  |
| STSS9        |                                      | Securitisation classification       | N/A (General Information)  | {LIST}                               | N/A   | The type of securitisation: non-ABCP securitisation; ABCP transaction; ABCP programme.  | N/A  |
| STSS10       |                                      | Underlying exposures classification | N/A (General Information)  | {LIST}                               | N/A   | The type of underlying exposures including:<br><sup>1)</sup> residential loans that fall within SECN 2.4.1R(1)(a)(i);<br><sup>2)</sup> commercial loans that fall within SECN 2.4.1R(1)(a)(ii);<br><sup>3)</sup> credit facilities that fall within SECN 2.4.1R(1)(a)(iii);<br><sup>4)</sup> credit facilities, including loans and leases, | N/A  |

|        |  |   |                           |                 |   |  |     |
|--------|--|---|---------------------------|-----------------|---|--|-----|
|        |  |   |                           |                 |   | provided to any type of enterprise or corporation;<br><sup>5)</sup> auto loans/leases;<br><sup>6)</sup> credit card receivables;<br><sup>7)</sup> trade receivables;<br><sup>8)</sup> 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; |     |
| STSS11 |  | Issue date  | N/A (General Information) | {DATEFORMAT}    | N/A   | If a prospectus is drawn up in compliance with the rules in PRM and / or corresponding legislation applicable in a third country, the date on which the prospectus was approved.<br>In all other cases, the closing date of the most recent transaction.   | N/A |
| STSS12 |  | Notification date   | N/A (General Information) | {DATEFORMAT}    | N/A   | The date of notification to the FCA, or if prior to IP completion day, date of notification to ESMA.   | N/A |
| STSS13 |  | Authorised third party  | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, a statement that the authorised third party firm has confirmed compliance with the STS criteria.   | N/A |
| STSS14 |  | Authorised third party (name)   | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, the name of the third party.   | N/A |
| STSS15 |  | [Note: empty row that serves to avoid re-numbering of rows.]                        |                           |                 |   |  | N/A |
| STSS16 |  | STS status  | N/A (General Information) | {ALPHANUM-1000} | Regulation 11 of the Securitisation Regulations | A reasoned notification by the originator and sponsor that the securitisation is no longer to be considered as STS, or that a STS notification should be revised.  | N/A |
| STSS17 |  | Originator (or original lender) not a UK credit institution or a UK investment firm | N/A (General Information) | {Y/N}           | SECN 2.5.3R                                     | A 'Yes' or 'No' statement of whether the originator or original lender is a CRR firm or an FCA investment firm.  | N/A |
| STSS18 |  | Confirmation of credit-granting criteria  | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.3R                                     | If 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 SECN 8.  | N/A |
| STSS19 |  | Declaration that the credit-granting is subject to supervision                      | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.3R                                     | If the answer to field STSS17 is 'No', declaration that the credit granting referred to in SECN 2.5.3R (1)(a) is subject to supervision.   | N/A |

|        |  |  |                     |                  |             |  |                                      |
|--------|--|--|---------------------|------------------|-------------|--|--------------------------------------|
| STSS20 |  | Transfer of the underlying exposures by true sale or assignment  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.2R | A concise explanation of how the transfer of the underlying exposures is made by means of true sale, assignment or transfer with the same legal effect in a manner that is enforceable against the seller or any other third party.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS21 |  | No severe clawback   | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.3R | A concise explanation of whether the transfer of title is subject to any of the severe clawback provisions referred to in SECN 2.2.3R. State whether the provisions in SECN 2.2.4R apply.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS22 |  | Exemption for clawback provisions in national insolvency laws  | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.4R | In conjunction with STSS21, where appropriate, a confirmation whether there are no circumstances that could give rise to clawback provisions in accordance with SECN 2.2.2R and SECN 2.2.3R.   | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS23 |  | Transfer where the seller is not the original lender   | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.5R | If the seller is not the original lender, a statement confirming that the securitisation complies with SECN 2.2.2R and SECN 2.2.4R.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS24 |  | Transfer performed by means of an assignment and perfected at a later stage  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.6R | If the transfer of the underlying exposures is performed by assignment and perfected after the transaction's closing, a concise explanation of how and whether that perfection is effected at least through the required minimum pre-determined event triggers under SECN 2.2.6R. If alternative transfer methods are used, a confirmation that the originator's insolvency would not prejudice or prevent the SSPE from enforcing its rights. | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS25 |  | Representations and warranties   | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.7R | A concise explanation of how and whether the seller has provided representations and warranties, that the underlying exposures included in the securitisation are not encumbered or otherwise in a condition that can be foreseen adversely to affect the enforceability of the true sale, assignment or transfer with the same legal effect.  | Item 2.2.8 of PRM App 2 Annex 14.2R. |
| STSS26 |  | Eligibility criteria which do not allow for active portfolio management of the underlying exposures on a discretionary basis | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.8R | A concise explanation of how: <ul style="list-style-type: none"> <li>the underlying exposures the seller transfers to the SSPE (if an SSPE is used) or that are otherwise securitised meet predetermined, clear and documented eligibility criteria prohibiting active portfolio management of those exposures on a discretionary basis.</li> <li>the selection and transfer of the underlying</li> </ul>                                      | PRM App 2 Annex 14.2R.               |

|               |  |  |                      |                 |              |  |   |
|---------------|--|--|----------------------|-----------------|--------------|--|---|
|               |  |  |                      |                 |              | 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.   |   |
| <b>STSS27</b> |  | Homogeneity of assets                                | Detailed Explanation | {ALPHANUM}      | SECN 2.2.9R  | A detailed explanation of the homogeneity of the pool of underlying exposures backing the securitisation. For that purpose, include a reference to the relevant section of SECN on homogeneity and explain in detail how each of the conditions specified in SECN 2.4.IR are met.  | Item 2.2.7 of PRM<br>App 2 Annex 14.2R. |
| <b>STSS28</b> |  | Underlying exposure obligations: no resecuritisation | Confirmation         | {ALPHANUM-1000} | SECN 2.2.10R | A confirmation 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 PRM<br>App 2 Annex 14.2R.   |
| <b>STSS29</b> |  | Soundness of the underwriting standard               | Detailed Explanation | {ALPHANUM}      | SECN 2.2.11R | A detailed explanation:<br>· of 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.<br>· of 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.<br>· of how securitisations where the underlying exposures are residential loans, the pool of underlying exposures meet the requirement in SECN 2.2.11R (3).<br>· of whether an assessment of the borrower's creditworthiness meets the requirements set out in SECN 2.2.11R(4) or, where applicable, equivalent requirements in third countries. | Item 2.2.7 of PRM<br>App 2 Annex 14.2R. |
| <b>STSS30</b> |  | Originator/Lender expertise                          | Detailed Explanation | {ALPHANUM}      | SECN 2.2.11R | A detailed explanation of whether the originator or original lender have expertise in originating exposures of a similar nature to those securitised.  | Item 2.2.7 of PRM<br>App 2 Annex 14.2R. |

|        |  |   |                      |                 |              |  |   |
|--------|--|---|----------------------|-----------------|--------------|--|---|
| STSS31 |  | Transferred underlying exposures without exposures in default   | Detailed Explanation | {ALPHANUM}      | SECN 2.2.12R | <p>A detailed explanation of whether:</p> <ul style="list-style-type: none"> <li>• the transferred underlying exposures do not include, at the time of selection, defaulted exposures (or restructured exposures) within the meaning of the definition referred to in SECN 2.2.12R(2);</li> <li>• the requirements referred to in SECN 2.2.12R (2) (c) — (e) subject to SECN 2.2.12R (3) are met;</li> <li>• the requirements referred to in SECN 2.2.12R (2)(a) are met;</li> <li>• the requirements referred to in SECN 2.2.12R (2)(b) are met.</li> </ul>   | Item 2.2.8 of PRM App 2 Annex 14.2R.                                      |
| STSS32 |  | At least one payment at the time of transfer  | Confirmation         | {ALPHANUM-1000} | SECN 2.2.13R | <p>A confirmation whether, at the time of transfer of the exposures, the debtors have made at least one payment.</p> <p>A confirmation whether the exemption under SECN 2.2.13R.</p>   | Items 3.3 and 3.4.6 of PRM App 2 Annex 14.3R.                             |
| STSS33 |  | Repayment of the holders shall not have been structured to depend predominantly on the sale of assets | Detailed Explanation | {ALPHANUM}      | SECN 2.2.14R | <p>A detailed explanation of the extent to which repayment of securitisation investors depends on sale of assets securing the underlying exposures.</p>  | Item 3.4.1 of PRM App 2 Annex 14.3R.                                      |
| STSS34 |  | Compliance with the risk retention requirements   | Concise Explanation  | {LIST}          | SECN 2.2.15R | <p>A concise explanation as to how the originator, sponsor or original lender of a non-ABCP securitisation comply with the risk retention requirement under SECN 5.2.</p> <p>An indication which entity retains the material net economic interest and which option is used for retaining the risk:</p> <ul style="list-style-type: none"> <li>• vertical slice in accordance with SECN 5.2.8R (1)(a);</li> <li>• seller's share in accordance with SECN 5.2.8R (1)(b);</li> <li>• randomly-selected exposures kept on balance sheet, in accordance with SECN 5.2.8R (1)(c);</li> <li>• first loss tranche in accordance with SECN 5.2.8R (1)(d);</li> <li>• first loss exposure in each asset in accordance with SECN 5.2.8R(1)(e);</li> <li>• L-shaped risk retention in accordance with SECN 5.2.8R(1)(f);</li> <li>• no compliance with risk retention requirements</li> </ul> | Item 3.1 of PRM App 2 Annex 7.3R and Item 3.4.3 of PRM App 2 Annex 14.3R. |

|               |  |   |                     |                  |              |   |  |
|---------------|--|---|---------------------|------------------|--------------|---|--|
|               |  |   |                     |                  |              | set out in SECN 5.2.8R;<br>. other options used.  |  |
| <b>STSS35</b> |  | Mitigation of interest rates (IR) and currency (FX) risks                     | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.16R | A concise explanation that measures are taken appropriately to mitigate interest rates and currency risks and confirmation that such measures are available to investors.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.    |
| <b>STSS36</b> |  | Derivatives purchased/sold by SSPE  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.16R | A concise declaration that the SSPE has not entered into derivative contracts except in the circumstances under SECN 2.2.16R.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.    |
| <b>STSS37</b> |  | Derivatives using common standards  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.16R | A concise explanation of whether any hedging instruments used are underwritten and documented according to commonly accepted standards.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.    |
| <b>STSS38</b> |  | Referenced interest payments based on generally used interest rates           | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.17R | A concise explanation of 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 sectoral rates reflective of the cost of funds. | Items 2.2.2 and 2.2.13 of PRM App 2 Annex 14.2R. |
| <b>STSS39</b> |  | No trapping of cash following enforcement or an acceleration notice           | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.18R | A declaration in general terms that each of the requirements of SECN 2.2.18R are met.   | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| <b>STSS40</b> |  | No amount of cash shall be trapped  | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.18R | Confirmation that no cash would be trapped after an enforcement or an acceleration notice was delivered.  | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| <b>STSS41</b> |  | Principal receipts shall be passed to investors                               | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.18R | Confirmation 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 PRM App 2 Annex 14.3R.             |
| <b>STSS42</b> |  | Repayment shall not be reversed with regard to seniority                      | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.18R | Confirmation that the repayment of the securitisation positions is not to be reversed with regard to their seniority.   | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| <b>STSS43</b> |  | No provisions shall require automatic liquidation of the underlying exposures | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.18R | Confirmation that no provisions require automatic liquidation of the underlying exposures at market value.  | Item 3.4.5 of PRM App 2 Annex 14.3R.             |

|        |  |   |                     |                  |                  |   |   |
|--------|--|---|---------------------|------------------|------------------|---|---|
|        |  | at market value   |                     |                  |                  |   |   |
| STSS44 |  | Securitisations featuring nonsequential priority of payments  | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.19R     | Confirmation that transaction featuring non-sequential priority of payments include triggers relating to the performance of the underlying exposures resulting in the priority of payment reverting to sequential payments in order of seniority.<br><br>Confirmation that such triggers include the deterioration in the credit quality of the underlying exposures below a predetermined threshold. | Item 3.4.5 of PRM App 2 Annex 14.3R.        |
| STSS45 |  | Revolving securitisation with early amortisation events for termination of revolving period based on prescribed triggers                        | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R     | A concise explanation, where applicable, of how the provisions in SECN 2.2.20R are reflected in the transaction documentation.  | Items 2.3 and 2.4 PRM App 2 Annex 14.2R.    |
| STSS46 |  | Deterioration in the credit quality of the underlying exposures   | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (1) | A concise explanation (where applicable) of how the provisions in SECN 2.2.20R (1) are reflected in the transaction documentation.  | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS47 |  | Occurrence of an insolvency related event of the originator or servicer   | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (2) | A concise explanation, (where applicable) of how the provisions or triggers in SECN 2.2.20R (2) are reflected in the transaction documentation.   | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS48 |  | Value of the underlying exposures held by the SSPE falls below a predetermined threshold  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (3) | A concise explanation, where applicable, of how the provisions or triggers in SECN 2.2.20R (3) are reflected in the transaction documentation.<br><br>Please cross reference the relevant sections of the underlying documentation where the information can be found.  | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS49 |  | Failure to generate sufficient new underlying exposures meeting pre-determined credit quality (trigger for termination of the revolving period) | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (4) | A concise explanation, where applicable, of how the provisions in SECN 2.2.20R (4) are reflected in the transaction documentation.  | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS50 |  | Information regarding contractual obligations of the servicer, trustee and other ancillary service providers                                    | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.21R (1) | Confirmation that the transaction documentation specifies all the requirements under SECN 2.2.21R (1).  | Item 3.2 of PRM App 2 Annex 14.3R.          |
| STSS51 |  | Servicing continuity  | Confirmation        | {ALPHANUM-1000}  |                  | Confirmation that the securitisation documentation  | Item 3.2 of PRM                             |

|        |  |   |                      |                  |                  |  |   |
|--------|--|---|----------------------|------------------|------------------|--|---|
|        |  | provisions  |                      |                  | SECN 2.2.21R (2) | expressly satisfies the requirements of 2.2.21R (2).   | App 2 Annex 14.3R.                              |
| STSS52 |  | Derivative counterparties continuity provisions   | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.21R (3) | Confirmation that the transaction documentation satisfies all of the information referred to in SECN 2.2.21 R (3).   | Item 3.8 of PRM App 2 Annex 14.3R.              |
| STSS53 |  | Liquidity providers and account bank continuity provisions  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.21R (3) | Confirmation that the transaction documentation satisfies all of the information under SECN 2.2.21 R (3).  | Item 3.8 of PRM App 2 Annex 14.3R.              |
| STSS54 |  | Required expertise from the servicer and policies and adequate procedures and risk management controls in place | Detailed Explanation | {ALPHANUM}       | SECN 2.2.22R     | A detailed explanation of how the requirements of SECN 2.2.22R are met. As part of the explanation, include references to any policies and procedures intended to ensure compliance with these requirements.   | Item 3.4.6 of PRM App 2 Annex 14.3R.            |
| STSS55 |  | Clear and consistent definitions relating to the treatment of problem loans                                     | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.23R     | Confirmation that the underlying documentation sets out in clear and consistent terms, definitions, remedies and actions relating to the debt situations set out in SECN 2.2.23R.  | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| STSS56 |  | Priorities of payment and trigger events  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.23R     | Confirmation that the securitisation documentation sets out the priorities of payment and trigger events pursuant to SECN 2.2.23R.   | Item 3.4.7 of PRM App 2 Annex 14.3R.            |
| STSS57 |  | Timely resolution of conflicts between classes of investors and responsibilities of trustees                    | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.24R     | Confirmation that the provisions under SECN 2.2.24R relating to the timely resolutions of conflicts are met.   | Items 3.4.7 and 3.4.8 of PRM App 2 Annex 14.3R. |
| STSS58 |  | Historical default and loss performance data  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.25R     | Confirmation that the data required to be made available under SECN 2.2.25R is available, stating clearly where the information can be found.  | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| STSS59 |  | Sample of the underlying exposures subject to external verifications  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.26R     | Confirmation that a sample of the underlying exposures was subject to external verification before the issuance of the securities by an appropriate and independent party.   | N/A   |
| STSS60 |  | Availability of a liability cash flow model to potential investors  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.27R     | Confirmation that a liability cash flow model is available to potential investors before pricing and state clearly where this information is available.<br>Confirmation that such information has been made available, after pricing, to potential investors upon request. | N/A   |
| STSS61 |  | Publication on environmental performance of   | Concise Explanation  | {ALPHANUM-10000} | SECN 2.2.28 R    | A concise explanation of whether the information related to the environmental performance of the assets financed by residential loans, or auto loans   | N/A   |

|        |  |   |              |                 |               |   |     |
|--------|--|---|--------------|-----------------|---------------|---|-----|
|        |  | underlying exposures consisting of residential loans or car loans or leases |              |                 |               | or leases is available pursuant to SECN 6.2.1R (1) and a statement where that information is to be found.   |     |
| STSS62 |  | Originator and sponsor responsible for compliance with SECN 6               | Confirmation | {ALPHANUM-1000} | SECN 2.2.29 R | <p>Confirmation that:</p> <ul style="list-style-type: none"> <li>• the originator and the sponsor comply with SECN 6;</li> <li>• the information required under SECN 6.2.1R (1) has been made available to potential investors before pricing upon request;</li> <li>• the information required by SECN 6.2.1R (2) — (4) has been made available before pricing at least in draft or initial form.</li> </ul> | N/A |

## ABCP Transaction

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME  | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN                 | CONTENT TO BE REPORTED: (If appropriate, this includes a reference to the relevant sections of the underlying documentation where the information is available)  | ADDITIONAL INFORMATION                                   |
|--------------|--------------------------------------|-------------------------------------|--|--------------------------------------|---|--|--|
| STSAT0       |                                      | First contact point                 | N/A (General Information)  | {ALPHANUM-1000}                      | SECN 2.5.1R   | Legal Entity Identifier (LEI) of the entity designated as the first contact point.   | Item 3.2 of Annex 14.3R of PRM App 2.                    |
| STSAT1       |                                      | Instrument identification code      | N/A (General Information)  | {ISIN}                               | N/A   | If available, the international security identification code (ISIN) or codes. If no ISIN, then any other unique securities code, assigned to the ABCP transaction.   | Where available under Item 3.1 of PRM App 2 Annex 14.3R. |
| STSAT2       |                                      | Legal Entity Identifier (LEI)       | N/A (General Information)  | {LEI}                                | N/A   | If available, the LEI of the originator (s) and/or sponsor(s).   | Item 4.2 of PRM App 2 Annex 7.4R.                        |
| STSAT3       |                                      | Notification identifier             | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If reporting an update, the unique reference number the FCA has assigned to the previously notified STS notification.  | N/A  |
| STSAT4       |                                      | Unique identifier                   | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The unique identifier assigned by the reporting entity to this ABCP transaction in accordance with SECN 11.12.2R.  | N/A  |
| STSAT5       |                                      | Prospectus identifier               | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If available, the prospectus identifier as provided by the relevant national regulator(s).   | N/A  |
| STSAT6       |                                      | Securitisation repository           | N/A (General Information)  | {ALPHANUM-1000}                      | N/A   | If available, the name of the registered securitisation repository.  | N/A  |
| STSAT7       |                                      | Securitisation name                 | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If available, the securitisation name or in the absence thereof, the code name and used name.  | Section 4 of PRM App 2 Annex 7.4R.                       |
| STSAT8       |                                      | Country of establishment            | N/A (General Information)  | {COUNTRYCODE_2}                      | Regulations 10 and 13 of the Securitisation Regulations and SECN 2.5.3R | If available, the country of establishment of the originator(s), sponsor(s) and SSPE(s).   | N/A  |
| STSAT9       |                                      | Securitisation classification       | N/A (General Information)  | {LIST}                               | N/A   | The type of securitisation: non-ABCP securitisation, ABCP transaction, ABCP programme.   | N/A  |
| STSAT10      |                                      | Underlying exposures classification | N/A (General Information)  | {LIST}                               | N/A   | The type of underlying exposures including: residential loans that fall within SECN 2.4.1R(1)(a)(i); commercial loans that fall within SECN 2.4.1R(1)(a)(ii); credit facilities that fall within SECN 2.4.1R(1)(a)(iii); | N/A  |

|                |  |  |                           |                  |   |   |                                    |
|----------------|--|--|---------------------------|------------------|---|---|------------------------------------|
|                |  |  |                           |                  |   | credit facilities, including loans and leases, provided to any type of enterprise or corporation; auto loans/leases; credit card receivables; trade receivables; 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; |                                    |
| <b>STSAT11</b> |  | Issue date   | N/A (General Information) | {DATEFORMAT}     | N/A   | If a prospectus is drawn up in compliance with the rules in PRM, and / or corresponding legislation applicable in a third country, the date on which the prospectus was approved. If not, the issuance date of the ABCP transaction.  | N/A                                |
| <b>STSAT12</b> |  | Notification date  | N/A (General Information) | {DATEFORMAT}     | N/A   | The date of notification to the FCA, or if prior to IP completion day, date of notification to ESMA.  | N/A                                |
| <b>STSAT13</b> |  | Authorised third party   | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, a statement that the authorised third party firm has confirmed compliance with the STS criteria.  | N/A                                |
| <b>STSAT14</b> |  | Authorised third party (name)  | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, the third party's name.   | N/A                                |
| <b>STSAT15</b> |  | [Note: empty row that serves to avoid re-numbering of rows.]             |                           |                  |   |   | N/A                                |
| <b>STSAT16</b> |  | STS status   | N/A (General Information) | {ALPHANUM-1000}  | Regulation 11 of the Securitisation Regulations | A reasoned notification by the originator and sponsor that the securitisation is no longer to be considered as STS, or that a STS notification should be revised.   | N/A                                |
| <b>STSAT17</b> |  | Originator (or original lender) not a CRR firm or an FCA investment firm | N/A (General Information) | {Y/N}            | SECN 2.5.3R                                     | A 'Yes' or 'No' statement of whether the originator or original lender is a CRR firm or an FCA investment firm.   | N/A                                |
| <b>STSAT18</b> |  | Confirmation of credit-granting criteria                                 | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.3R                                     | If 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 SECN 8.   | N/A                                |
| <b>STSAT19</b> |  | Declaration that credit-granting is subject to supervision               | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.3R                                     | If the answer to field STSS17 is 'No', declaration that the credit granting referred to in SECN 2.5.3R (1)(a) is subject to supervision.  | N/A                                |
| <b>STSAT20</b> |  | Transfer of the underlying exposures by true sale or assignment          | Concise Explanation       | {ALPHANUM-10000} | SECN 2.3.2R                                     | A concise explanation of 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 PRM App 2 Annex 14.3R. |
| <b>STSAT21</b> |  | No severe clawback   |                           |                  |   | A concise explanation of whether the transfer of title is subject to any of the severe clawback provisions referred to in SECN 2.3.3R (1)(a) and (b).   | Item 3.3 of PRM App 2 Annex 14.3R. |

|         |  |  |                     |                  |             |   |                                      |
|---------|--|--|---------------------|------------------|-------------|---|--------------------------------------|
|         |  |  | Concise Explanation | {ALPHANUM-10000} | SECN 2.3.3R | State whether the provisions in SECN 2.3.4R apply.  |                                      |
| STSAT22 |  | Exemption for clawback provisions in national insolvency laws  | Confirmation        | {ALPHANUM-1000}  | SECN 2.3.4R | In conjunction with STSS21, where appropriate, confirmation that there are no circumstances that could give rise to clawback provisions in accordance with SECN 2.3.2R.   | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSAT23 |  | Transfer where the seller is not the original lender   | Confirmation        | {ALPHANUM-1000}  | SECN 2.3.5R | If the seller is not the <i>original lender</i> , a statement confirming that the <i>securitisation</i> complies with SECN 2.3.2R to SECN 2.3.4R.   | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSAT24 |  | Transfer performed by means of an assignment and perfected at a later stage  | Concise Explanation | {ALPHANUM-10000} | SECN 2.3.6R | If the transfer of the underlying exposures is performed by means of an assignment and perfected after the transaction's closing, provide a concise explanation of how and whether that perfection is effected at least through the required minimum pre-determined event triggers as listed in SECN 2.3.6R.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSAT25 |  | Representations and warranties   | Concise Explanation | {ALPHANUM-10000} | SECN 2.3.7R | A concise explanation of whether the seller has provided representations and warranties that the assets included in the <i>securitisation</i> are not encumbered or otherwise in a condition that can be foreseen to adversely affect the enforceability of the transfer by the means in SECN 2.3.2R.   | Item 2.2.8 of PRM App 2 Annex 14.2R. |
| STSAT26 |  | Eligibility criteria which do not allow for active portfolio management of the underlying exposures on a discretionary basis | Concise Explanation | {ALPHANUM-10000} | SECN 2.3.8R | A concise explanation of how: the underlying exposures the seller transfers to the SSPE (if an SSPE is used) or that are otherwise securitised meet predetermined, clear and documented eligibility criteria prohibiting active portfolio management of those exposures on a discretionary basis.<br>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. | PRM App 2 Annex 14.2R.               |
| STSAT27 |  | No resecuritisation  | Confirmation        | {ALPHANUM-1000}  | SECN 2.3.9R | Confirmation that the underlying exposures do not include any securitisation positions and that the notified securitisation is therefore not a resecuritisation.  | Item 2.2.2 of PRM App 2 Annex 14.2R. |

|         |  |   |                      |                  |              |  |   |
|---------|--|---|----------------------|------------------|--------------|--|---|
| STSAT28 |  | Transferred underlying exposures without defaulted exposures  | Detailed Explanation | {ALPHANUM}       | SECN 2.3.10R | <p>A detailed explanation of how the transferred underlying exposures do not include, at the time of selection, defaulted exposures or restructured exposures as set out in SECN 2.3.10R, as applicable. If appropriate, a clear statement whether the securitisation contains any credit impairment at the time of securitisation as specified in SECN 2.3.10R (2)(b)(i).</p> <p>Confirmation that:</p> <ul style="list-style-type: none"> <li>at the time of origination, the requirements referred to in SECN 2.3.10R (2)(c);</li> <li>at the time of selection, the requirements referred to in SECN 2.3.10R (2)(d) are met</li> </ul> | Item 2.2.8 of PRM App 2 Annex 14.2R.          |
| STSAT29 |  | At least one payment at the time of transfer  | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.11R | Confirmation whether, at the time of transfer of the exposures, the debtors have made at least one payment. If no payment has been made, an explanation why this is the case, including a statement of whether the reason is one of the exceptions permitted under SECN 2.2.13R applies.   | Items 3.3 and 3.4.6 of PRM App 2 Annex 14.3R. |
| STSAT30 |  | Repayment of the holders shall not have been structured to depend predominantly on the sale of assets | Detailed Explanation | {ALPHANUM}       | SECN 2.3.12R | A detailed explanation of the degree of dependence of the repayments of the holders of the <i>securitisation position</i> on the sale of assets securing the underlying exposures. If appropriate, a detailed explanation of whether repayments of the <i>investors</i> are not considered to depend on the sale of assets, as specified under SECN 2.3.12R (3).   | Item 3.4.1 of PRM App 2 Annex 14.3R.          |
| STSAT31 |  | Mitigation of interest rates (IR) and currency (FX) risks   | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | <p>A concise explanation that measures are taken appropriately to mitigate interest rates and currency risks and confirmation that such measures are disclosed.</p> <p>A concise explanation whether any hedging instruments used are underwritten and documented according to commonly accepted standards.</p>  | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R. |
| STSAT32 |  | Derivatives purchased/sold by SSPE  | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | Except for the purpose of hedging interest-rate or currency risk, a concise explanation whether the SSPE has not entered into derivative contracts.  | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R. |
| STSAT33 |  | Derivatives in underlying exposures   | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | A concise explanation on the presence of any derivatives in the pool of underlying exposures.  | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R. |
| STSAT34 |  | Derivatives using common standards  | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | A concise explanation whether any derivatives permissible under SECN 2.3.13R are underwritten and documented according to common standards in international finance.   | Items 3.4.7 and 3.8 of PRM App 2 Annex 14.3R. |

|         |  |   |                      |                 |              |   |   |
|---------|--|---|----------------------|-----------------|--------------|---|---|
| STSAT35 |  | Clear and consistent definitions relating to the treatment of problem loans | Confirmation         | {ALPHANUM-1000} | SECN 2.3.14R | Confirmation that the underlying documentation sets out in clear and consistent terms, definitions, remedies and actions relating to the debt situations set out in SECN 2.3.14R.   | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| STSAT36 |  | Priorities of payment and trigger events                                    | Confirmation         | {ALPHANUM-1000} | SECN 2.3.14R | Confirmation that the transaction documentation sets out the priorities of payment and triggers events pursuant to SECN 2.3.14.   | Items 3.4.7 and 3.4.8 of PRM App 2 Annex 14.3R. |
| STSAT37 |  | Historical default and loss performance data                                | Confirmation         | {ALPHANUM-1000} | SECN 2.3.16R | Confirmation that the data required to be made available under SECN 2.3.16R is available and a clear statement where the information is available to potential investors before pricing.<br><br>If the sponsor does not have access to such data, confirmation that the seller has provided access to data as specified under SECN 2.3.16R.<br>Confirmation that the data are available and state clearly, where the information is available and that the data cover a period no shorter than five years except for trade receivables and other short-term receivables for which the historical period is no shorter than three years. | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| STSAT38 |  | Homogeneity of assets   | Detailed Explanation | {ALPHANUM}      | SECN 2.3.17R | A detailed explanation how the securitisation is backed by a pool of underlying exposures that are homogenous, taking into account the characteristics relating to the cash flows of different asset types including their contractual, credit-risk and prepayment characteristics.   | Item 2.2.7 of PRM App 2 Annex 14.2R.            |
| STSAT39 |  | Underlying exposure obligations   | Confirmation         | {ALPHANUM-1000} | SECN 2.3.17R | Confirmation that the pool of underlying exposures has a remaining weighted average life of no more than one year and that none of the underlying exposures has a residual maturity of more than three years.<br>Confirmation whether the derogation regarding pools of auto loans, auto leases or equipment lease transactions applies, in accordance with SECN 2.3.17R (3).   | Item 2.2.7 of PRM App 2 Annex 14.2R.            |
| STSAT40 |  | Underlying exposure obligations   | Confirmation         | {ALPHANUM-1000} |              | Confirmation, where appropriate, that the underlying exposures:<br>do not include loans secured by residential or commercial mortgages;<br>contain obligations that are contractually binding and enforceable, with full recourse to debtors with defined payment streams relating to rental, principal, interest, or related to any other right to   | Item 2.2.7 of PRM App 2 Annex 14.2R.            |

|         |  |   |                      |                  |              |   |  |
|---------|--|---|----------------------|------------------|--------------|---|--|
|         |  |   |                      |                  | SECN 2.3.17R | receive income from assets warranting such payments;<br>does not include transferable securities as defined in the Glossary to the FCA Handbook other than corporate bonds, that are not listed on a trading venue as defined in the Glossary to the FCA Handbook.  |  |
| STSAT41 |  | Referenced interest payments based on generally used interest rates                           | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.18R | A concise explanation whether and how any referenced interest payments under the ABCP transaction's assets and liabilities are calculated by reference to generally used market interest rates or generally used sectoral rates reflective of the cost of funds.  | Items 2.2.2 and 2.2.13 of PRM App 2 Annex 14.2R. |
| STSAT42 |  | No trapping of cash following enforcement or acceleration notice                              | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.19R | A concise explanation on whether each of the requirements of SECN 2.3.19R are met, including a concise explanation of cases where cash may be trapped.  | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| STSAT43 |  | No trapping of cash following enforcement or acceleration                                     | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.19R | Confirmation that no cash would be trapped after an enforcement or an acceleration notice was delivered.  | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| STSAT44 |  | Principal receipts shall be passed to investors   | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.19R | Confirmation that principal receipts from the underlying exposures are passed to investors via sequential amortisation of the securitisation positions, as determined by the seniority of the securitisation position.  | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| STSAT45 |  | No provisions shall require automatic liquidation of the underlying exposures at market value | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.19R | Confirmation that not any provisions require automatic liquidation of the underlying exposures at market value.   | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| STSAT46 |  | Soundness of the underwriting standards   | Detailed Explanation | {ALPHANUM}       | SECN 2.3.20R | A detailed explanation as to whether the underlying exposures were originated in the seller's ordinary course of business, specifying whether the underwriting standard are no less stringent than those applied to exposures that were not securitised.<br>A detailed explanation as to whether any material changes from prior underwriting standards have been disclosed to the sponsor and others parties directly exposed to the ABCP transaction. | Item 2.2.7 of PRM App 2 Annex 14.2R.             |
| STSAT47 |  | Seller expertise  | Detailed Explanation | {ALPHANUM}       | SECN 2.3.20R | A detailed explanation as to whether the seller has the required expertise in originating exposures of a similar nature to those securitised.   | Item 2.2.7 of PRM App 2 Annex 14.2R.             |
| STSAT48 |  | Revolving ABCP transaction / credit quality trigger   | Detailed Explanation | {ALPHANUM}       | SECN 2.3.21R | A detailed explanation how the provisions or triggers in SECN 2.3.21R are included in the securitisation  | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R.      |

|         |  |  |              |                 |              |   |                                    |
|---------|--|--|--------------|-----------------|--------------|---|------------------------------------|
|         |  |  |              |                 |              | documentation.  |                                    |
| STSAT49 |  | Securitisation participant duties                                | Confirmation | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes the contractual obligations, duties and responsibilities of the sponsor, the servicer and the trustee, if any, and other ancillary service provider.                  | Item 3.2 of PRM App 2 Annex 14.3R. |
| STSAT50 |  | Servicing continuity provisions                                  | Confirmation | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes the processes and responsibilities necessary to ensure that a default or insolvency of the servicer does not result in a termination of servicing.                    | Item 3.7 of PRM App 2 Annex 14.3R. |
| STSAT51 |  | Derivative counterparties and account bank continuity provisions | Confirmation | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes provisions that ensure the replacement of derivative counterparties and the account bank upon their default, insolvency and other specified events, where applicable. | Item 3.8 of PRM App 2 Annex 14.3R. |
| STSAT52 |  | Sponsor robustness   | Confirmation | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes provisions on how the sponsor meets the requirements in SECN 2.3.25R(1).  | Item 3.2 of PRM App 2 Annex 14.3R. |

## ABCP Programme

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN                 | BACKGROUND INFORMATION: FIELD DESCRIPTION (where appropriate, this includes a reference to the relevant sections of the underlying documentation where the information can be found) | ADDITIONAL INFORMATION                                   |
|--------------|--------------------------------------|------------------------------------|--|--------------------------------------|---|--|--|
| STSAP0       |                                      | First contact point                | N/A (General Information)  | {ALPHANUM-1000}                      | SECN 2.5.1R   | Legal Entity Identifier (LEI) of the entity designated as the first contact point.   | Item 3.2 of PRM App 2 Annex 14.3R.                       |
| STSAP1       |                                      | Instrument identification code     | N/A (General Information)  | {ISIN}                               | N/A   | If applicable, the international security identification (ISIN) codes assigned to the ABCP programmes.   | Where available under Item 3.1 of PRM App 2 Annex 14.3R. |
| STSAP2       |                                      | Legal Entity Identifier (LEI)      | N/A (General Information)  | {LEI}                                | N/A   | If available, the LEI of the sponsor(s) and/or ABCP programme(s).  | Item 4.2 of PRM App 2 Annex 7.4R.                        |
| STSAP3       |                                      | Notification identifier            | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If reporting an update, the unique reference number assigned by the FCA to the previously notified STS notification.   | N/A  |
| STSAP4       |                                      | Unique identifier                  | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The unique identifier assigned by the reporting entity to this ABCP programme in accordance with SEC   | N/A  |
| STSAP5       |                                      | Prospectus identifier              | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If available, the prospectus identifier as provided by the relevant national regulator(s).   | N/A  |
| STSAP6       |                                      | Securitisation repository          | N/A (General Information)  | {ALPHANUM-1000}                      | N/A   | If available, the name of the registered securitisation repository.  | N/A  |
| STSAP7       |                                      | Securitisation name                | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The name of the ABCP programme.  | PRM App 2 Annex 7.4R.                                    |
| STSAP8       |                                      | Country of establishment           | N/A (General Information)  | {Y/N}                                | Regulations 10 and 13 of the Securitisation Regulations and SECN 2.5.3R | Confirmation that the sponsor is established in the United Kingdom.  | Item 4.3 of PRM App 2 Annex 7.4R.                        |

|         |  |  |                           |                 |   |  |                       |
|---------|--|--|---------------------------|-----------------|---|--|-----------------------|
| STSAP9  |  | Securitisation classification                                | N/A (General Information) | {LIST}          | N/A   | The type of securitisation (non-ABCP securitisation; ABCP transaction; or ABCP programme).   | N/A                   |
| STSAP10 |  | Issuance date  | N/A (General Information) | {DATEFORMAT}    | N/A   | The date of the first issuance of the ABCP programme.  | PRM App 2 Annex 7.4R. |
| STSAP11 |  | Notification date  | N/A (General Information) | {DATEFORMAT}    | N/A   | The date of STS notification to the FCA, or if prior to IP completion day, date of notification to ESMA.   | N/A                   |
| STSAP12 |  | Authorised third party                                       | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, a statement that the authorised third party firm has confirmed compliance with the STS criteria.   | N/A                   |
| STSAP13 |  | Authorised third party (name)                                | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, the the third party's name.  | N/A                   |
| STSAP14 |  | [Note: empty row that serves to avoid re-numbering of rows.] |                           |                 |   |  | N/A                   |
| STSAP15 |  | STS status   | N/A (General Information) | {ALPHANUM-1000} | Regulation 11 of the Securitisation Regulations | A reasoned notification by the originator and sponsor that the ABCP programme is no longer to be considered as STS, or that a STS notification should be revised.  | N/A                   |
| STSAP16 |  | Sponsor to be a CRR firm, but not an investment firm         | Confirmation              | {ALPHANUM-1000} | SECN 2.3.23R                                    | Confirmation that the sponsor of the programme is a CRR firm, but not an investment firm and link to a document attesting to such status.  | N/A                   |
| STSAP17 |  | Sponsor support as liquidity facility provider               | Confirmation              | {ALPHANUM-1000} | SECN 2.3.24R                                    | Confirmation that the sponsor of the ABCP programme provides a liquidity facility and that it supports all securitisation positions on the ABCP programme, including a description of the liquidity facility and a link to any document evidencing such provision.   | N/A                   |
| STSAP18 |  | Demonstration to the PRA                                     | Confirmation              | {ALPHANUM-1000} | SECN 2.3.25R                                    | Confirmation that in respect of its role as sponsor, the credit institution does not endanger its solvency and liquidity, and a link, where available, to the document supporting it has demonstrated this position to the PRA.  | N/A                   |
| STSAP19 |  | Compliance with sponsor's due diligence requirements         | Confirmation              | {ALPHANUM-1000} | SECN 2.3.26R                                    | Confirmation the sponsor's compliance with the due diligence requirements set out in SECN 4.2.1R(1) and SECN 4.2.2R, as applicable. Confirmation that the sponsor has verified that the seller has in place the required servicing capabilities and collection processes that meet the requirements specified in SECN 2.3.26R (3) or equivalent requirements in third countries. | N/A                   |

|         |  |   |                      |                  |                         |  |                                      |
|---------|--|---|----------------------|------------------|-------------------------|--|--------------------------------------|
| STSAP20 |  | The seller (at transaction level) or the sponsor (at the ABCP programme level) shall satisfy the risk retention requirements as provided under SECN 5 | Concise Explanation  | {LIST}           | SECN 2.3.27R            | A concise explanation on how the seller (ABCP securitisation) and the sponsor (ABCP programme) comply with the risk retention requirements as specified under SECN 5.2 specifying the option used for retaining the risk including:<br>vertical slice – i.e. SECN 5.2.8R (1)(a);<br>seller's share – i.e. SECN 5.2.8R (1)(b);<br>randomly-selected exposures kept on balance sheet – i.e. SECN 5.2.8R (1)(c);<br>first loss tranche – i.e. SECN 5.2.8R (1)(d);<br>first loss exposure in each asset – i.e. SECN 5.2.8R (1)(e);<br>L-shaped risk retention - i.e. SECN 5.2.8R(1)(f);<br>no compliance with risk retention requirements of SECN;<br>other. | Item 3.4.3 of PRM App 2 Annex 14.3R. |
| STSAP21 |  | Compliance at ABCP programme level with SECN 6 (transparency requirements)  | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.28R            | Confirmation that:<br>the sponsor is responsible for compliance with SECN 6.2;<br>the sponsor is complying with SECN 6.2 at the ABCP programme level;<br>the sponsor has made available to potential investors before pricing and upon their request: the aggregate information required by SECN 6.2.1R (1), and the information required by SECN 6.2.1R (2) to (5), at least in draft or initial form.  | N/A                                  |
| STSAP22 |  | Drawdown of liquidity facility, where funding commitments of the liquidity facility are not renewed by the sponsor                                    | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.29R            | A concise explanation from the sponsor as to whether the liquidity facility will be drawn down and the maturing securities are repaid in the event that the sponsor does not renew the funding commitment of the liquidity facility before its expiry.   | N/A                                  |
| STSAP23 |  | Compliance of ABCP transactions within an ABCP programme with SECN 2.3.2R to SECN 2.3.9R and SECN 2.3.13R to SECN 2.3.22R                             | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.30R            | Confirmation whether all ABCP transactions within the programme meet the following requirements:<br>SECN 2.3.2R to SECN 2.3.9R.<br>SECN 2.3.13R to SECN 2.3.22R.   | N/A                                  |
| STSAP24 |  | Maximum of 5% of the aggregate amount of the underlying exposures may temporarily be non-compliant with certain requirements                          | Detailed Explanation | {ALPHANUM}       | SECN 2.3.30R (2) to (3) | A detailed explanation as to which, if any, of the requirements of SECN 2.3.10R, 2.3.11R or 2.3.12R are temporarily not in compliance with and the percentage of the aggregate amount of the exposures underlying the ABCP transactions it represents and why the programme has temporarily  | N/A                                  |

|         |  |   |                      |                  |                  |  |     |
|---------|--|---|----------------------|------------------|------------------|--|-----|
|         |  |   |                      |                  |                  | breached those requirements. Confirmation that a sample of the underlying exposures is subject to regular external verification of compliance by an appropriate independent party.   |     |
| STSAP25 |  | Remaining weighted average life (WAL) in the underlying exposures of an ABCP programme shall not be more than two years | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.31R     | Confirmation that the remaining weighted average life of the underlying exposures of an ABCP programme are not more than two years.  | N/A |
| STSAP26 |  | Fully supported ABCP programme (sponsor support)  | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.32R     | A concise explanation whether or not the ABCP programme is fully supported by a sponsor in accordance with SECN 2.3.24R.   | N/A |
| STSAP27 |  | No re-securitisation and no credit enhancement establishing a second layer of tranching at the ABCP programme level     | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.33R     | Confirmation that the ABCP programme does not contain any re-securitisation and that the credit enhancement does not establish a second layer of tranching at the programme level.   | N/A |
| STSAP28 |  | No call options   | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.34R     | Confirmation that the ABCP programme does not include call option or clauses with an effect of the securities' final maturity at the discretion of the seller, sponsor or SSPE.  | N/A |
| STSAP29 |  | Interest rate and currency risks at ABCP programme appropriately mitigated and documented                               | Detailed Explanation | {ALPHANUM}       | SECN 2.3.35R     | A detailed explanation that measures are taken appropriately to mitigate interest rates and currency risks arising at ABCP programme level, and details of those measures, including whether the SSPE enters into derivative contracts other than for the reasons set out by SECN 2.3.35R. A description of how those derivatives are underwritten and documented, in particular whether it is done according to on common standards in international finance. | N/A |
| STSAP30 |  | Requirements for the ABCP programme documentation (responsibilities of the trustee to investors)                        | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.36R (1) | Confirmation that the responsibilities of the trustee and other entities with fiduciary duties, if any to investors are specified in the ABCP programme's documentation.   | N/A |
| STSAP31 |  | Requirements for the ABCP programme documentation (contractual obligations of the sponsor)                              | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.36R (2) | Confirmation that the contractual obligations, duties and responsibilities of the sponsor, the trustee and other ancillary services providers, if any, are specified in the ABCP programme's documentation.  | N/A |
| STSAP32 |  | Requirements for the ABCP programme documentation (process and responsibilities in case of defaulted servicer)          | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.36R (3) | Confirmation that the ABCP programme's documentation contains processes and responsibilities covering servicer default or insolvency to ensure servicing continuity.   | N/A |

|         |  |   |                      |                 |                  |   |                                    |
|---------|--|---|----------------------|-----------------|------------------|---|------------------------------------|
| STSAP33 |  | Requirements for the ABCP programme documentation (provisions for replacement of derivatives counterparties and the account bank)   | Confirmation         | {ALPHANUM-1000} | SECN 2.3.36R (4) | Confirmation that the requirements under SECN 2.3.36R (4) are met regarding provisions for replacement of derivatives counterparties, and the account bank at ABCP programme level upon their default, insolvency and other specified events, where the liquidity facility does not cover such events.  | N/A                                |
| STSAP34 |  | Requirements for the ABCP programme documentation (procedures to ensure collateralisation of the funding commitment)  | Confirmation         | {ALPHANUM-1000} | SECN 2.3.36R (5) | Confirmation that the ABCP programme's documentation contains procedures ensuring that upon specified events, defaults or insolvency of the sponsor, remedial step shall be provided for to achieve, as appropriate, collateralisation of the funding commitment or replacement of the liquidity facility provider.<br>A statement indicating the relevant pages of the prospectus or other underlying documentation that contain the information relevant to the requirements set out in SECN 2.3.36R (5). | N/A                                |
| STSAP35 |  | Requirements for the ABCP programme documentation (liquidity facility and maturing securities to be repaid where the sponsor does not renew the funding commitment of the liquidity facility before its expiry) | Confirmation         | {ALPHANUM-1000} | SECN 2.3.36R (6) | Confirmation that the ABCP programme's documentation contains provisions ensuring that the liquidity facility shall be drawn down and the maturing securities shall be repaid in the event that the sponsor does not renew the funding commitment of the liquidity facility before its expiry.<br>A statement indicating the relevant pages of the prospectus or other underlying documentation that contain the information relevant to the requirements set out in SECN 2.3.36R (6).                      | N/A                                |
| STSAP36 |  | Servicer expertise  | Detailed Explanation | {ALPHANUM}      | SECN 2.3.37R     | A detailed explanation of how the requirements of SECN 2.3.37R are met, including the policies and procedures ensuring compliance with these requirements.<br>A statement indicating the relevant pages of the prospectus or other underlying documentation that contain the applicable explanations to meet the requirements set out in SECN 2.3.37R (as applicable) ('servicer expertise, policies, procedures, and risk management').  | Item 3.2 of PRM App 2 Annex 14.3R. |

**2 Annex Private templates for STS notifications under SECN 2.6.1R(2)(b)  
2R**

[*Editor's note:* insert link to 'Private templates for STS notifications under SECN 2.6.1R(2)(b)'.]

## Non-ABCP securitisation

| A detailed explanation of whether the originator or original lender have expertise in originating exposures of a similar nature to those securitised.<br>FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME  | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN                 | BACKGROUND INFORMATION: (If appropriate, include a reference to the relevant sections of the underlying documentation where the information is available)  | ADDITIONAL INFORMATION                                   |
|---|--------------------------------------|-------------------------------------|--|--------------------------------------|---|--|--|
| STSS0   |                                      | First contact point                 | N/A (General Information)  | {ALPHANUM-1000}                      | SECN 2.5.1R   | Legal Entity Identifier (LEI) of the entity designated as the first contact point  | Item 3.2 of PRM App 2 Annex 14.3R.                       |
| STSS1   |                                      | Instrument identification code      | N/A (General Information)  | {ISIN}                               | N/A   | Where available, the international security identification code (ISIN) or codes. If no ISIN is available, then any other unique securities code assigned to this securitisation.   | Where available under Item 3.1 of PRM App 2 Annex 14.3R. |
| STSS2   |                                      | 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 PRM App 2 Annex 7.4R.                        |
| STSS3   |                                      | Notification identifier             | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If reporting an update, the unique reference number assigned by the FCA to the previously not  | N/A  |
| STSS4   |                                      | Unique identifier                   | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The unique identifier assigned by the reporting entity in accordance with SECN 11.12.1R.   | N/A  |
| STSS5   |                                      | Prospectus identifier               | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If available, the prospectus identifier as provided by the relevant national regulator(s).   | N/A  |
| STSS6   |                                      | Securitisation repository           | N/A (General Information)  | {ALPHANUM-1000}                      | N/A   | If available, the name of the registered securitisation repository.  | N/A  |
| STSS7   |                                      | Securitisation name                 | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The securitisation name.   | PRM App 2 Annex 7.4R.                                    |
| STSS8   |                                      | Country of establishment            | N/A (General Information)  | {COUNTRYCODE_2}                      | Regulations 10 and 13 of the Securitisation Regulations and SECN 2.5.3R | If available, the country of establishment of the originator(s), sponsor(s), SSPE(s) and original lender(s).   | N/A  |
| STSS9   |                                      | Securitisation classification       | N/A (General Information)  | {LIST}                               | N/A   | The type of securitisation: non-ABCP securitisation; ABCP transaction; ABCP programme.   | N/A  |
| STSS10  |                                      | Underlying exposures classification | N/A (General Information)  | {LIST}                               | N/A   | The type of underlying exposures including: residential loans that fall within SECN 2.4.1R(1)(a)(i); commercial loans that fall within SECN 2.4.1R(1)(a)(ii); credit facilities that fall within SECN 2.4.1R(1)(a)(iii); | N/A  |

|        |  |  |                           |                  |  |   |                                    |
|--------|--|--|---------------------------|------------------|--|---|------------------------------------|
|        |  |  |                           |                  |  | credit facilities, including loans and leases, provided to any type of enterprise or corporation; auto loans/leases; credit card receivables; trade receivables; 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; |                                    |
| STSS11 |  | Issue date   | N/A (General Information) | {DATEFORMAT}     | N/A  | If a prospectus is drawn up in compliance with the rules in PRM and / or corresponding legislation applicable in a third country, the date on which the prospectus was approved. In all other cases, the closing date of the most recent transaction.   | N/A                                |
| STSS12 |  | Notification date  | N/A (General Information) | {DATEFORMAT}     | N/A  | The date of notification to the FCA or if prior to IP completion day, date of notification to ESM   | N/A                                |
| STSS13 |  | Authorised third party   | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.2R                                | If an authorised third party has provided STS verification services in accordance with SECN 2.5.  | N/A                                |
| STSS14 |  | Authorised third party (name)  | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.2R                                | If an authorised third party has provided STS verification services in accordance with SECN 2.5.  | N/A                                |
| STSS15 |  | [Note: empty row that serves to avoid re-numbering of rows.]             |                           |                  |  |   | N/A                                |
| STSS16 |  | STS status   | N/A (General Information) | {ALPHANUM-1000}  | Regulation 11 of the Securitisation Regula | A reasoned notification by the originator and sponsor that the securitisation is no longer to be considered as STS, or that a STS notification should be revised.   | N/A                                |
| STSS17 |  | Originator (or original lender) not a CRR firm or an FCA investment firm | N/A (General Information) | {Y/N}            | SECN 2.5.3R                                | A 'Yes' or 'No' statement of whether the originator or original lender is a CRR firm or an FCA investment firm.   | N/A                                |
| STSS18 |  | Confirmation of credit-granting criteria                                 | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.3R                                | If 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 SECN 8.   | N/A                                |
| STSS19 |  | Declaration that the credit-granting is subject to supervision           | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.3R                                | If the answer to field STSS17 is 'No', declaration that the credit granting referred to in SECN 2.5.3R (1)(a) is subject to supervision.  | N/A                                |
| STSS20 |  | Transfer of the underlying exposures by true sale or assignment          | Concise Explanation       | {ALPHANUM-10000} | SECN 2.2.2R                                | A concise explanation of how the transfer of the underlying exposures is made by means of true sale, assignment or transfer with the same legal effect in a manner that is enforceable against the seller or any other third party.   | Item 3.3 of PRM App 2 Annex 14.3R. |
| STSS21 |  | No severe clawback   | Concise Explanation       | {ALPHANUM-10000} | SECN 2.2.3R                                | A concise explanation of whether the transfer of title is subject to any of the severe clawback provisions referred to in SECN 2.2.3R. State whether the provisions in SECN 2.2.4R apply.   | Item 3.3 of PRM App 2 Annex 14.3R. |

|        |  |  |                      |                  |              |  |                                      |
|--------|--|--|----------------------|------------------|--------------|--|--------------------------------------|
| STSS22 |  | Exemption for clawback provisions in national insolvency laws  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.4R  | In conjunction with STSS21, where appropriate, a confirmation whether there are no circumstances that could give rise to clawback provisions in accordance with SECN 2.2.2R and SECN 2.2.3R.   | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS23 |  | Transfer where the seller is not the original lender   | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.5R  | If the seller is not the original lender, a statement confirming that the securitisation complies with SECN 2.2.2R and SECN 2.2.4R.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS24 |  | Transfer performed by means of an assignment and perfected at a later stage  | Concise Explanation  | {ALPHANUM-10000} | SECN 2.2.6R  | If the transfer of the underlying exposures is performed by assignment and perfected after the transaction's closing, a concise explanation of how and whether that perfection is effected at least through the required minimum predetermined event triggers under SECN 2.2.6R. If alternative transfer methods are used, a confirmation that the originator's insolvency would not prejudice or prevent the SSPE from enforcing its rights.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSS25 |  | Representations and warranties   | Concise Explanation  | {ALPHANUM-10000} | SECN 2.2.7R  | A concise explanation of how and whether the seller has provided representations and warranties, that the underlying exposures included in the securitisation are not encumbered or otherwise in a condition that can be foreseen adversely to affect the enforceability of the true sale, assignment or transfer with the same legal effect.  | Item 2.2.8 of PRM App 2 Annex 14.2R. |
| STSS26 |  | Eligibility criteria which do not allow for active portfolio management of the underlying exposures on a discretionary basis | Concise Explanation  | {ALPHANUM-10000} | SECN 2.2.8R  | A concise explanation on how:<br>-the underlying exposures the seller transfers to the SSPE (if an SSPE is used) or that are otherwise securitised meet predetermined discretionary clear and documented eligibility criteria prohibiting active portfolio management of those exposures on a discretionary basis.<br>-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. | PRM App 2 Annex 14.2R.               |
| STSS27 |  | Homogeneity of assets  | Detailed Explanation | {ALPHANUM}       | SECN 2.2.9R  | A detailed explanation of the homogeneity of the pool of underlying exposures backing the securitisation. For that purpose, include a reference to the relevant section of SECN on homogeneity and explain in detail how each of the conditions specified in SECN 2.4.1R are met.  | Item 2.2.7 of PRM App 2 Annex 14.2R. |
| STSS28 |  | Underlying exposure obligations: no resecuritisation   | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.10R | A confirmation that the underlying exposures do not include any securitisation positions and that the  | Item 2.2 of PRM App 2 Annex 14.2R.   |

|        |  |   |                      |                 |              |  |   |
|--------|--|---|----------------------|-----------------|--------------|--|---|
|        |  |   |                      |                 |              | notified securitisation is therefore not a re-securitisation.  |   |
| STSS29 |  | Soundness of the underwriting standard  | Detailed Explanation | {ALPHANUM}      | SECN 2.2.11R | A detailed explanation:<br>of 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.<br>of 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.<br>of how securitisations where the underlying exposures are residential loans, the pool of underlying exposures meet the requirement in SECN 2.2.11R (3).<br>of whether an assessment of the borrower's creditworthiness meets the requirements set out in SECN 2.2.11R(4) or, where applicable, equivalent requirements in third countries. | Item 2.2.7 of PRM App 2 Annex 14.2R.          |
| STSS30 |  | Originator/Lender expertise   | Detailed Explanation | {ALPHANUM}      | SECN 2.2.11R | A detailed explanation of whether the originator or original lender have expertise in originating exposures of a similar nature to those securitised.  | Item 2.2.7 of PRM App 2 Annex 14.2R.          |
| STSS31 |  | Transferred underlying exposures without exposures in default   | Detailed Explanation | {ALPHANUM}      | SECN 2.2.12R | A detailed explanation of whether:<br>the transferred underlying exposures do not include, at the time of selection, defaulted exposures (or restructured exposures) within the meaning of the definition referred to in SECN 2.2.12R(2).<br>the requirements referred to in SECN 2.2.12R (2) (c) — (e) subject to SECN 2.2.12R (3) are met.<br>the requirements referred to in SECN 2.2.12R (2)(a) are met;<br>the requirements referred to in SECN 2.2.12R (2)(b) are met.   | Item 2.2.8 of PRM App 2 Annex 14.2R.          |
| STSS32 |  | At least one payment at the time of transfer  | Confirmation         | {ALPHANUM-1000} | SECN 2.2.13R | A confirmation whether, at the time of transfer of the exposures, the debtors have made at least one payment. A confirmation whether the exemption under SECN 2.2.13R.   | Items 3.3 and 3.4.6 of PRM App 2 Annex 14.3R. |
| STSS33 |  | Repayment of the holders shall not have been structured to depend predominantly on the sale of assets | Detailed Explanation | {ALPHANUM}      | SECN 2.2.14R | A detailed explanation of the extent to which repayment of securitisation investors depends on sale of assets securing the underlying exposures  | Item 3.4.1 of PRM App 2 Annex 14.3R.          |

|        |  |   |                     |                  |              |   |   |
|--------|--|---|---------------------|------------------|--------------|---|---|
| STSS34 |  | Compliance with the risk retention requirements                     | Concise Explanation | {LIST}           | SECN 2.2.15R | <p>A concise explanation as to how the originator, sponsor or original lender of a non-ABCP securitisation comply with the risk retention requirement under SECN 5.2.</p> <p>An indication which entity retains the material net economic interest and which option is used for retaining the risk:</p> <ul style="list-style-type: none"> <li>vertical slice in accordance with SECN 5.2.8R (1)(a);</li> <li>seller's share in accordance with SECN 5.2.8R (1)(b);</li> <li>randomly-selected exposures kept on balance sheet, in accordance with SECN 5.2.8R (1)(c);</li> <li>first loss tranche in accordance with SECN 5.2.8R (1)(d);</li> <li>first loss exposure in each asset in accordance with SECN 5.2.8R(1)(e);</li> <li>L-shaped risk retention in accordance with SECN 5.2.8R(1)(f);</li> <li>no compliance with risk retention requirements set out in SECN 5.2.8R;</li> <li>other options used.</li> </ul> | Item 3.1 of PRM App 2 Annex 7.3R and Item 3.4.3 of PRM App 2 Annex 14.3R. |
| STSS35 |  | Mitigation of interest rates (IR) and currency (FX) risks           | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.16R | A concise explanation that measures are taken appropriately to mitigate interest rates and currency risks and confirmation that such measures are available to investors.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.                             |
| STSS36 |  | Derivatives purchased/sold by SSPE                                  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.16R | A concise declaration that the SSPE has not entered into derivative contracts except in the circumstances under SECN 2.2.16R.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.                             |
| STSS37 |  | Derivatives using common standards                                  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.16R | A concise explanation of whether any hedging instruments used are underwritten and documented according to commonly accepted standards.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.                             |
| STSS38 |  | Referenced interest payments based on generally used interest rates | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.17R | A concise explanation of 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 sectoral rates reflective of the cost of funds  | Items 2.2.2 and 2.2.13 of PRM App 2 Annex 14.2R.                          |
| STSS39 |  | No trapping of cash following enforcement or an acceleration notice | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.18R | A declaration in general terms that each of the requirements of SECN 2.2.18R are met.   | Item 3.4.5 of PRM App 2 Annex 14.3R.                                      |
| STSS40 |  | No amount of cash shall be trapped                                  | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.18R | Confirmation that no cash would be trapped following the delivery of enforcement or an acceleration notice.   | Item 3.4.5 of PRM App 2 Annex 14.3R.                                      |
| STSS41 |  | Principal receipts shall be passed to investors                     | Confirmation        | {ALPHANUM-1000}  |              | Confirmation that principal receipts from the underlying exposures are passed to the investors via  |   |

|        |  |   |                     |                  |                  |   |   |
|--------|--|---|---------------------|------------------|------------------|---|---|
|        |  |   |                     |                  | SECN 2.2.18R     | sequential amortisation of the securitisation positions, as determined by the seniority of the securitisation position.   | Item 3.4.5 of PRM App 2 Annex 14.3R.        |
| STSS42 |  | Repayment shall not be reversed with regard to seniority  | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.18R     | Confirmation that the repayment of the securitisation positions is not to be reversed with regard to their seniority.   | Item 3.4.5 of PRM App 2 Annex 14.3R.        |
| STSS43 |  | No provisions shall require automatic liquidation of the underlying exposures at market value   | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.18R     | Confirmation that no provisions require automatic liquidation of the underlying exposures at market value.  | Item 3.4.5 of PRM App 2 Annex 14.3R.        |
| STSS44 |  | Securitisations featuring nonsequential priority of payments  | Confirmation        | {ALPHANUM-1000}  | SECN 2.2.19R     | Confirmation that transaction featuring nonsequential priority of payments include triggers relating to the performance of the underlying exposures resulting in the priority of payment reverting to sequential payments in order of seniority.<br>Confirmation that such triggers include at least the deterioration in the credit quality of the underlying exposures below a predetermined threshold. | Item 3.4.5 of PRM App 2 Annex 14.3R.        |
| STSS45 |  | Revolving securitisation with early amortisation events for termination of revolving period based on prescribed triggers                        | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R     | A concise explanation, where applicable, of how the provisions in SECN 2.2.20R are reflected in the transaction documentation.  | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS46 |  | Deterioration in the credit quality of the underlying exposures   | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (1) | A concise explanation (where applicable) of how the provisions in SECN 2.2.20R (1) are reflected in the transaction documentation.  | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS47 |  | Occurrence of an insolvency related event of the originator or servicer   | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (2) | A concise explanation, (where applicable) of how the provisions or triggers in SECN 2.2.20R (2) are reflected in the transaction documentation.   | Items 2.3 and 2.4 PRM App 2 Annex 14.2R.    |
| STSS48 |  | Value of the underlying exposures held by the SSPE falls below a predetermined threshold  | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (3) | A concise explanation, where applicable, of how the provisions or triggers in SECN 2.2.20R (3) are reflected in the transaction documentation. Please cross reference the relevant sections of the underlying documentation where the information can be found.   | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS49 |  | Failure to generate sufficient new underlying exposures meeting pre-determined credit quality (trigger for termination of the revolving period) | Concise Explanation | {ALPHANUM-10000} | SECN 2.2.20R (4) | A concise explanation, where applicable, of how the provisions in SECN 2.2.20R (4) are reflected in the transaction documentation.  | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSS50 |  | Information regarding contractual obligations of the  | Confirmation        | {ALPHANUM-1000}  |                  | Confirmation that the transaction documentation specifies all the requirements under SECN 2.  |   |

|        |  |   |                      |                  |                  |   |   |
|--------|--|---|----------------------|------------------|------------------|---|---|
|        |  | servicer, trustee and other ancillary service providers   |                      |                  | SECN 2.2.21R (1) |   | Item 3.2 of PRM App 2 Annex 14.3R.              |
| STSS51 |  | Servicing continuity provisions   | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.21R (2) | Confirmation that the securitisation documentation expressly satisfies the requirements of 2.2.21R (2).   | Item 3.2 of PRM App 2 Annex 14.3R.              |
| STSS52 |  | Derivative counterparties continuity provisions   | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.21R (3) | Confirmation that the transaction documentation satisfies all of the information referred to in SECN 2.2.21 R (3).  | Item 3.8 of PRM App 2 Annex 14.3R.              |
| STSS53 |  | Liquidity providers and account bank continuity provisions  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.21R (3) | Confirmation that the transaction documentation satisfies all of the information under SECN 2.2.21 R (3).   | Item 3.8 of PRM App 2 Annex 14.3R.              |
| STSS54 |  | Required expertise from the servicer and policies and adequate procedures and risk management controls in place         | Detailed Explanation | {ALPHANUM}       | SECN 2.2.22R     | A detailed explanation of how the requirements of SECN 2.2.22R are met. As part of the explanation, include references to any policies and procedures intended to ensure compliance with these requirements.  | Item 3.4.6 of PRM App 2 Annex 14.3R.            |
| STSS55 |  | Clear and consistent definitions relating to the treatment of problem loans   | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.23R     | Confirmation that the underlying documentation sets out in clear and consistent terms, definitions, remedies and actions relating to the debt situations set out in SECN 2.2.23R.   | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| STSS56 |  | Priorities of payment and trigger events  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.23R     | Confirmation that the securitisation documentation sets out the priorities of payment and trigger events pursuant to SECN 2.2.23R.  | Item 3.4.7 of PRM App 2 Annex 14.3R.            |
| STSS57 |  | Timely resolution of conflicts between classes of investors and responsibilities of trustees                            | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.24R     | Confirmation that the provisions under SECN 2.2.24R relating to the timely resolutions of conflicts are met.  | Items 3.4.7 and 3.4.8 of PRM App 2 Annex 14.3R. |
| STSS58 |  | Historical default and loss performance data  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.25R     | Confirmation that the data required to be made available under SECN 2.2.25R is available, stating clearly where the information can be found.   | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| STSS59 |  | Sample of the underlying exposures subject to external verifications  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.26R     | Confirmation that a sample of the underlying exposures was subject to external verification before the issuance of the securities by an appropriate and independent party.  | N/A   |
| STSS60 |  | Availability of a liability cash flow model to potential investors  | Confirmation         | {ALPHANUM-1000}  | SECN 2.2.27R     | Confirmation that a liability cash flow model is available to potential investors before pricing and state clearly where this information is available. Confirmation that such information has been made available, after pricing, to potential investors upon request. | N/A   |
| STSS61 |  | Publication on environmental performance of underlying exposures consisting of residential loans or car loans or leases | Concise Explanation  | {ALPHANUM-10000} | SECN 2.2.28R     | A concise explanation of whether the information related to the environmental performance of the assets financed by residential loans, or auto loans or leases is available pursuant to SECN 6.2.1R (1) and a statement where that information is to be found.          | N/A   |

|        |  |   |              |                 |              |   |     |
|--------|--|---|--------------|-----------------|--------------|---|-----|
| STSS62 |  | Originator and sponsor responsible for compliance with SECN 6 | Confirmation | {ALPHANUM-1000} | SECN 2.2.29R | Confirmation that:<br>- the originator and the sponsor comply with SECN 6;<br>- the information required under SECN 6.2.1R (1) has been made available to potential investors before pricing upon request;<br>- the information required by SECN 6.2.1R (2) – (4) has been made available before pricing at least in draft or initial form. | N/A |
|--------|--|---|--------------|-----------------|--------------|---|-----|

## ABCP Transaction

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION : FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN                 | BACKGROUND INFORMATION: (If appropriate, include a reference to the relevant sections of the underlying documentation where the information is available)                                       | ADDITIONAL INFORMATION                                   |
|--------------|--------------------------------------|------------------------------------|--|---------------------------------------|---|---|--|
| STSAT0       |                                      | First contact point                | N/A (General Information)  | {ALPHANUM-1000}                       | SECN 2.5.1R   | Legal Entity Identifier (LEI) of the entity designated as the first contact point   | Item 3.2 of Annex 14.3R of PRM App 2.                    |
| STSAT1       |                                      | Instrument identification code     | N/A (General Information)  | {ISIN}                                | N/A   | If available, the international security identification (ISIN) code or codes, or if no ISIN code is available, then any other unique securities code or codes assigned to the ABCP transaction. | Where available under Item 3.1 of PRM App 2 Annex 14.3R. |
| STSAT2       |                                      | Legal Entity Identifier (LEI)      | N/A (General Information)  | {LEI}                                 | N/A   | If available, the LEI of the originator(s) and/or sponsor(s).   | Item 4.2 of PRM App 2 Annex 7.4R.                        |
| STSAT3       |                                      | Notification identifier            | N/A (General Information)  | {ALPHANUM-100}                        | N/A   | If reporting an update, the unique reference number assigned by the FCA to the previously notified STS notification.  | N/A  |
| STSAT4       |                                      | Unique identifier                  | N/A (General Information)  | {ALPHANUM-100}                        | N/A   | The unique identifier assigned by the reporting entity to this ABCP transaction in accordance with SECN 11.12.2R.   | N/A  |
| STSAT5       |                                      | Prospectus identifier              | N/A (General Information)  | {ALPHANUM-100}                        | N/A   | If available, the prospectus identifier as provided by the relevant national regulator(s).  | N/A  |
| STSAT6       |                                      | Securitisation repository          | N/A (General Information)  | {ALPHANUM-1000}                       | N/A   | If available, the name of the registered securitisation repository.   | N/A  |
| STSAT7       |                                      | Securitisation name                | N/A (General Information)  | {ALPHANUM-100}                        | N/A   | If available, the securitisation name or in the absence thereof, the code name and used name.   | Section 4 of PRM App 2 Annex 7.4R.                       |
| STSAT8       |                                      | Country of establishment           | N/A (General Information)  | {COUNTRYCODE_2}                       | Regulations 10 and 13 of the Securitisation Regulations and SECN 2.5.3R | If available, the country of establishment of the originator(s), sponsor(s) and SSPE(s).  | N/A  |
| STSAT9       |                                      | Securitisation classification      | N/A (General Information)  | {LIST}                                | N/A   | The type of securitisation (non-ABCP securitisation; ABCP transaction; or ABCP programme).  | N/A  |

|         |  |  |                           |                 |   |  |     |
|---------|--|--|---------------------------|-----------------|---|--|-----|
| STSAT10 |  | Underlying exposures classification                                      | N/A (General Information) | {LIST}          | N/A   | The type of underlying exposures including: residential loans that fall within SECN 2.4.1R(1)(a)(i); commercial loans that fall within SECN 2.4.1R(1)(a)(ii); credit facilities that fall within SECN 2.4.1R(1)(a)(iii); credit facilities, including loans and leases, provided to any type of enterprise or corporation; auto loans/leases; credit card receivables; trade receivables; 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 |
| STSAT11 |  | Issue date   | N/A (General Information) | {DATEFORMAT}    | N/A   | If a prospectus is drawn up in compliance with the rules in PRM, and / or corresponding legislation applicable in a third country, the date on which the prospectus was approved. If not, the issuance date of the ABCP transaction.   | N/A |
| STSAT12 |  | Notification date  | N/A (General Information) | {DATEFORMAT}    | N/A   | The date of notification to the FCA, or if prior to IP completion day, date of notification to ESMA.   | N/A |
| STSAT13 |  | Authorised third party   | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, a statement that the authorised third party firm has confirmed compliance with the STS criteria.   | N/A |
| STSAT14 |  | Authorised third party (name)  | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, the third party's name.  | N/A |
| STSAT15 |  | [Note: empty row that serves to avoid re-numbering of rows.]             |                           |                 |   |  | N/A |
| STSAT16 |  | STS status   | N/A (General Information) | {ALPHANUM-1000} | Regulation 11 of the Securitisation Regulations | A reasoned notification by the originator and sponsor that the securitisation is no longer to be considered as STS, or that a STS notification should be revised.  | N/A |
| STSAT17 |  | Originator (or original lender) not a CRR firm or an FCA investment firm | N/A (General Information) | {Y/N}           | SECN 2.5.3R                                     | A 'Yes' or 'No' statement of whether the originator or original lender is a CRR firm or an FCA investment firm.  | N/A |
| STSAT18 |  | Confirmation of credit-granting criteria                                 | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.3R                                     | If 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 SECN 8.  | N/A |

|         |  |  |                           |                  |             |   |                                      |
|---------|--|--|---------------------------|------------------|-------------|---|--------------------------------------|
| STSAT19 |  | Declaration that credit-granting is subject to supervision   | N/A (General Information) | {ALPHANUM-1000}  | SECN 2.5.3R | If the answer to field STSS17 is 'No', declaration that the credit granting referred to in SECN 2.5.3R (1)(a) is subject to supervision.  | N/A                                  |
| STSAT20 |  | Transfer of the underlying exposures by true sale or assignment  | Concise Explanation       | {ALPHANUM-10000} | SECN 2.3.2R | A concise explanation of 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 PRM App 2 Annex 14.3R.   |
| STSAT21 |  | No severe clawback   | Concise Explanation       | {ALPHANUM-10000} | SECN 2.3.3R | A concise explanation of whether the transfer of title is subject to any of the severe clawback provisions referred to in SECN 2.3.3R (1)(a) and (b).<br><br>State whether the provisions in SECN 2.3.4R apply.   | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSAT22 |  | Exemption for clawback provisions in national insolvency laws  | Confirmation              | {ALPHANUM-1000}  | SECN 2.3.4R | In conjunction with STSS21, where appropriate, confirmation that there are no circumstances that could give rise to clawback provisions in accordance with SECN 2.3.2R.   | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSAT23 |  | Transfer where the seller is not the original lender   | Confirmation              | {ALPHANUM-1000}  | SECN 2.3.5R | If the seller is not the original lender, a statement confirming that the securitisation complies with SECN 2.3.2R to SECN 2.3.4R.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSAT24 |  | Transfer performed by means of an assignment and perfected at a later stage  | Concise Explanation       | {ALPHANUM-10000} | SECN 2.3.6R | If the transfer of the underlying exposures is performed by means of an assignment and perfected after the transaction's closing, provide a concise explanation of how and whether that perfection is effected at least through the required minimum pre-determined event triggers as listed in SECN 2.3.6R.  | Item 3.3 of PRM App 2 Annex 14.3R.   |
| STSAT25 |  | Representations and warranties   | Concise Explanation       | {ALPHANUM-10000} | SECN 2.3.7R | A concise explanation of whether the seller has provided representations and warranties that the assets included in the securitisation are not encumbered or otherwise in a condition that can be foreseen to adversely affect the enforceability of the transfer by the means in SECN 2.3.2R.  | Item 2.2.8 of PRM App 2 Annex 14.2R. |
| STSAT26 |  | Eligibility criteria which do not allow for active portfolio management of the underlying exposures on a discretionary basis | Concise Explanation       | {ALPHANUM-10000} | SECN 2.3.8R | A concise explanation on how: the underlying exposures transferred from, or assigned by, the seller to the SSPE 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 | PRM App 2 Annex 14.2R.               |

|                |  |   |                      |                  |              |  |   |
|----------------|--|---|----------------------|------------------|--------------|--|---|
|                |  |   |                      |                  |              | into the securitisation and that they do not allow for their active portfolio management on a discretionary basis.   |   |
| <b>STSAT27</b> |  | No resecuritisation   | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.9R  | Confirmation that the underlying exposures do not include any securitisation positions and that the notified securitisation is therefore not a re-securitisation.  | Item 2.2.2 of PRM App 2 Annex 14.2R.          |
| <b>STSAT28</b> |  | Transferred underlying exposures without defaulted exposures  | Detailed Explanation | {ALPHANUM}       | SECN 2.3.10R | A detailed explanation how the transferred underlying exposures do not include, at the time of selection, defaulted exposures or restructured exposures as set out in SECN 2.3.10R, as applicable. If appropriate, a clear statement whether the securitisation contains any creditimpairment at the time of securitisation as specified in SECN 2.3.10R (2)(b)(i). Confirmation that: at the time of origination, the requirements referred to in SECN 2.3.10R (2)(c) are met; at the time of selection, the requirements referred to in SECN 2.3.10R (2)(d) are met. | Item 2.2.8 of PRM App 2 Annex 14.2R.          |
| <b>STSAT29</b> |  | At least one payment at the time of transfer  | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.11R | Confirmation whether, at the time of transfer of the exposures, the debtors have made at least one payment. Where no payment has been made, an explanation why this is the case, including a statement as to whether the reason is one of the exceptions permitted under SECN 2.2.13R applies.   | Items 3.3 and 3.4.6 of PRM App 2 Annex 14.3R. |
| <b>STSAT30</b> |  | Repayment of the holders shall not have been structured to depend predominantly on the sale of assets | Detailed Explanation | {ALPHANUM}       | SECN 2.3.12R | 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. If appropriate, a detailed explanation of whether repayments of the investors are not considered to depend on the sale of assets, as specified under SECN 2.3.12R (3).   | Item 3.4.1 of PRM App 2 Annex 14.3R.          |
| <b>STSAT31</b> |  | Mitigation of interest rates (IR) and currency (FX) risks   | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | A concise explanation whether and how the interest rates and currency risks are appropriately mitigated and confirm that the measures to that effect are disclosed. A concise explanation whether any hedging instruments used are underwritten and documented   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R. |

|                |  |   |                      |                  |              |   |   |
|----------------|--|---|----------------------|------------------|--------------|---|---|
|                |  |   |                      |                  |              | according to commonly accepted standards.   |   |
| <b>STSAT32</b> |  | Derivatives purchased/sold by SSPE  | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | Except for the purpose of hedging interest rate or currency risk, a concise explanation whether the SSPE has not entered into derivative contracts.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.   |
| <b>STSAT33</b> |  | Derivatives in underlying exposures   | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | A concise explanation on the presence of any derivatives in the pool of underlying exposures.   | Items 3.4.2 and 3.8 of PRM App 2 Annex 14.3R.   |
| <b>STSAT34</b> |  | Derivatives using common standards  | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.13R | A concise explanation whether any derivatives permissible under SECN 2.3.13R are underwritten and documented according to common standards in international finance.  | Items 3.4.7 and 3.8 of PRM App 2 Annex 14.3R.   |
| <b>STSAT35</b> |  | Clear and consistent definitions relating to the treatment of problem loans | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.14R | Confirmation that the underlying documentation sets out in clear and consistent terms, definitions, remedies and actions relating to the debt situations set out in SECN 2.3.14R.   | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| <b>STSAT36</b> |  | Priorities of payment and trigger events                                    | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.14R | Confirmation that the transaction documentation sets out the priorities of payment and triggers events pursuant to SECN 2.3.14.   | Items 3.4.7 and 3.4.8 of PRM App 2 Annex 14.3R. |
| <b>STSAT37</b> |  | Historical default and loss performance data                                | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.16R | Confirmation that the data required to be made available under SECN 2.3.16R is available and a clear statement where the information is available to potential investors before pricing. If the sponsor does not have access to such data, confirmation that the seller has provided access to data as specified under SECN 2.3.16R. Confirmation that the data are available and state clearly, where the information is available and that the data cover a period no shorter than five years except for trade receivables and other short-term receivables for which the historical period is no shorter than three years. | Item 2.2.2 of PRM App 2 Annex 14.2R.            |
| <b>STSAT38</b> |  | Homogeneity of assets   | Detailed Explanation | {ALPHANUM}       | SECN 2.3.17R | A detailed explanation how the securitisation is backed by a pool of underlying exposures that are homogenous, taking into account the characteristics relating to the cash flows of different asset types including their contractual, credit-risk and prepayment characteristics.   | Item 2.2.7 of PRM App 2 Annex 14.2R.            |
| <b>STSAT39</b> |  | Underlying exposure obligations   | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.17R | Confirmation that the pool of underlying exposures has a remaining weighted average life of no more than one year and that none of the underlying exposures has a residual maturity of more than three years.   | Item 2.2.7 of PRM App 2 Annex 14.2R.            |

|                |  |   |                      |                  |              |  |  |
|----------------|--|---|----------------------|------------------|--------------|--|--|
|                |  |   |                      |                  |              | Confirmation whether the derogation regarding pools of auto loans, auto leases or equipment lease transactions applies, in accordance with SECN 2.3.17R (3).   |  |
| <b>STSAT40</b> |  | Underlying exposure obligations   | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.17R | Confirmation, where appropriate, that the underlying exposures:<br>do not include loans secured by residential or commercial mortgages;<br>contain obligations that are contractually binding and enforceable, with full recourse to debtors with defined payment streams relating to rental, principal, interest, or related to any other right to receive income from assets warranting such payments;<br>does not include transferable securities as defined in the Glossary to the FCA Handbook other than corporate bonds, that are not listed on a trading venue as defined in the Glossary to the FCA Handbook. | Item 2.2.7 of PRM App 2 Annex 14.2R.             |
| <b>STSAT41</b> |  | Referenced interest payments based on generally used interest rates                           | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.18R | A concise explanation whether and how any referenced interest payments under the ABCP transaction's assets and liabilities are calculated by reference to generally used market interest rates or generally used sectoral rates reflective of the cost of funds.   | Items 2.2.2 and 2.2.13 of PRM App 2 Annex 14.2R. |
| <b>STSAT42</b> |  | No trapping of cash following enforcement or acceleration notice                              | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.19R | A concise explanation on whether each of the requirements of SECN 2.3.19R are met, including a concise explanation of cases where cash may be trapped.   | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| <b>STSAT43</b> |  | No trapping of cash following enforcement or acceleration                                     | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.19R | Confirmation that no cash would be trapped following an enforcement or an acceleration notice was delivered.   | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| <b>STSAT44</b> |  | Principal receipts shall be passed to investors   | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.19R | Confirmation that principal receipts from the underlying exposures are passed to investors via sequential amortisation of the securitisation positions, as determined by the seniority of the securitisation position.   | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| <b>STSAT45</b> |  | No provisions shall require automatic liquidation of the underlying exposures at market value | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.19R | Confirmation that not any provisions require automatic liquidation of the underlying exposures at market value.  | Item 3.4.5 of PRM App 2 Annex 14.3R.             |
| <b>STSAT46</b> |  | Soundness of the underwriting standards   | Detailed Explanation | {ALPHANUM}       | SECN 2.3.20R | A detailed explanation as to whether the underlying exposures were originated in the seller's ordinary course of business, specifying  |  |

|         |  |  |                      |                 |              |   |   |
|---------|--|--|----------------------|-----------------|--------------|---|---|
|         |  |  |                      |                 |              | whether the underwriting standard are no less stringent than those applied to exposures that were not securitised.<br>A detailed explanation as to whether any material changes from prior underwriting standards have been disclosed to the sponsor and others parties directly exposed to the ABCP transaction. | Item 2.2.7 of PRM App 2 Annex 14.2R.        |
| STSAT47 |  | Seller expertise   | Detailed Explanation | {ALPHANUM}      | SECN 2.3.20R | A detailed explanation as to whether the seller has the required expertise in originating exposures of a similar nature to those securitised.   | Item 2.2.7 of PRM App 2 Annex 14.2R.        |
| STSAT48 |  | Revolving ABCP transaction/credit quality trigger                | Detailed Explanation | {ALPHANUM}      | SECN 2.3.21R | A detailed explanation how the provisions or triggers in SECN 2.3.21R are included in the securitisation documentation.   | Items 2.3 and 2.4 of PRM App 2 Annex 14.2R. |
| STSAT49 |  | Securitisation participant duties                                | Confirmation         | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes the contractual obligations, duties and responsibilities of the sponsor, the servicer and the trustee, if any, and other ancillary service provider.  | Item 3.2 of PRM App 2 Annex 14.3R.          |
| STSAT50 |  | Servicing continuity provisions                                  | Confirmation         | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes the processes and responsibilities necessary to ensure that a default or insolvency of the servicer does not result in a termination of servicing.  | Item 3.7 of PRM App 2 Annex 14.3R.          |
| STSAT51 |  | Derivative counterparties and account bank continuity provisions | Confirmation         | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes provisions that ensure the replacement of derivative counterparties and the account bank upon their default, insolvency and other specified events, where applicable.   | Item 3.8 of PRM App 2 Annex 14.3R.          |
| STSAT52 |  | Sponsor robustness   | Confirmation         | {ALPHANUM-1000} | SECN 2.3.22R | Confirmation that the securitisation documentation includes provisions on how the sponsor meets the requirements in SECN 2.3.25R(1).  | Item 3.2 of PRM App 2 Annex 14.3R.          |

## ABCP Programme

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN                 | BACKGROUND INFORMATION: (If appropriate, include a reference to the relevant sections of the underlying documentation where the information is available) | ADDITIONAL INFORMATION                                   |
|--------------|--------------------------------------|------------------------------------|--|--------------------------------------|---|---|--|
| STSAP0       |                                      | First contact point                | N/A (General Information)  | {ALPHANUM-1000}                      | SECN 2.5.1R   | Legal Entity Identifier (LEI) of the entity designated as the first contact point   | Item 3.2 of Annex 14.3R of PRM App 2.                    |
| STSAP1       |                                      | Instrument identification code     | N/A (General Information)  | {ISIN}                               | N/A   | If applicable, the international security identification (ISIN) codes assigned to the ABCP programmes.  | Where available under Item 3.1 of PRM App 2 Annex 14.3R. |
| STSAP2       |                                      | Legal Entity Identifier (LEI)      | N/A (General Information)  | {LEI}                                | N/A   | If available, the LEI of the sponsor(s) and/or ABCP programme(s).   | Item 4.2 of PRM App 2 Annex 7.4R.                        |
| STSAP3       |                                      | Notification identifier            | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If reporting an update, the unique reference number assigned by the FCA to the previously notified STS notification.                                      | N/A  |
| STSAP4       |                                      | Unique identifier                  | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The unique identifier assigned by the reporting entity to this ABCP programme in accordance with SECN 11.12.1R.   | N/A  |
| STSAP5       |                                      | Prospectus identifier              | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If available, the prospectus identifier as provided by the relevant national regulator(s).  | N/A  |
| STSAP6       |                                      | Securitisation repository          | N/A (General Information)  | {ALPHANUM-1000}                      | N/A   | If available, the name of the registered securitisation repository.   | N/A  |
| STSAP7       |                                      | Securitisation name                | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The name of the ABCP programme.   | Section 4 of PRM App 2 Annex 7.4R.                       |
| STSAP8       |                                      | Country of establishment           | N/A (General Information)  | {Y/N}                                | Regulations 10 and 13 of the Securitisation Regulations and SECN 2.5.3R | Confirmation that the sponsor is established in the United Kingdom.   | Item 4.3 of PRM App 2 Annex 7.4R.                        |
| STSAP9       |                                      | Securitisation classification      | N/A (General Information)  | {LIST}                               | N/A   | The type of securitisation (non-ABCP securitisation; ABCP transaction; or ABCP programme).  | N/A  |
| STSAP10      |                                      | Issuance date                      | N/A (General Information)  | {DATEFORMAT}                         | N/A   | The date of the first issuance of the ABCP programme.   | Section 4 of PRM App 2 Annex 7.4R.                       |
| STSAP11      |                                      | Notification date                  | N/A (General Information)  | {DATEFORMAT}                         | N/A   | The date of notification to the FCA, or if prior to IP completion day, date of notification to ESMA.  | N/A  |
| STSAP12      |                                      | Authorised third party             |  |                                      |   | If an authorised third party has provided STS verification services in accordance with SECN   | N/A  |

|         |  |   |                           |                 |   |   |   |
|---------|--|---|---------------------------|-----------------|---|---|---|
|         |  |   | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | 2.5.2R, a statement that the authorised third party firm has confirmed compliance with the STS criteria.  |   |
| STSAP13 |  | Authorised third party (name)   | N/A (General Information) | {ALPHANUM-1000} | SECN 2.5.2R                                     | If an authorised third party has provided STS verification services in accordance with SECN 2.5.2R, the third party's name.   | N/A                                     |
| STSAP14 |  | [Note: empty row that serves to avoid re-numbering of rows.]  |                           |                 |   |   |   |
| STSAP15 |  | STS status  | N/A (General Information) | {ALPHANUM-1000} | Regulation 11 of the Securitisation Regulations | A reasoned notification by the sponsor that the ABCP programme is no longer to be considered as STS, or that a STS notification should be revised.  | N/A                                     |
| STSAP16 |  | Sponsor to be supervised CRR firm, but not an investment firm   | Confirmation              | {ALPHANUM-1000} | SECN 2.3.23R                                    | Confirmation that the sponsor of the programme is a CRR firm, but not an investment firm and link to a document attesting to such status.   | N/A                                     |
| STSAP17 |  | Sponsor support as liquidity facility provider  | Confirmation              | {ALPHANUM-1000} | SECN 2.3.24R                                    | Confirmation that the sponsor of the ABCP programme provides a liquidity facility and that it supports all securitisation positions on the ABCP programme, including a description of the liquidity facility and a link to any document evidencing such provision.  | N/A                                     |
| STSAP18 |  | Demonstration to the PRA  | Confirmation              | {ALPHANUM-1000} | SECN 2.3.25R                                    | Confirmation that in respect of its role as sponsor, the credit institution does not endanger its solvency and liquidity, and a link, where available, to the document supporting it has demonstrated this position to the PRA.   | N/A                                     |
| STSAP19 |  | Compliance with sponsor's due diligence requirements  | Confirmation              | {ALPHANUM-1000} | SECN 2.3.26R                                    | Confirmation the sponsor's compliance with the due diligence requirements set out in SECN 4.2.1R(1) and SECN 4.2.2R, as applicable. Confirmation that the sponsor has verified that the seller has in place the required servicing capabilities and collection processes that meet the requirements specified in SECN 2.3.26R(3) or equivalent requirements in third countries.   | N/A                                     |
| STSAP20 |  | The seller (at transaction level) or the sponsor (at the ABCP programme level) shall satisfy the risk retention requirements as provided under SECN 5 | Concise Explanation       | {LIST}          | SECN 2.3.27R                                    | A concise explanation on how the seller (ABCP securitisation) and the sponsor (ABCP programme) comply with the risk retention requirements as specified under SECN 5.2 specifying the option used for retaining the risk including: vertical slice – i.e. SECN 5.2.8R (1)(a); seller's share – i.e. SECN 5.2.8R (1)(b); randomly-selected exposures kept on balance sheet – i.e. SECN 5.2.8R (1)(c); first loss tranche – i.e. SECN 5.2.8R (1)(d); first loss exposure in each asset – i.e. SECN 5.2.8R (1)(e); L-shaped risk retention - i.e. SECN 5.2.8R(1)(f); | Item 3.4.3 of Annex 14.3R of PRM App 2. |

|         |  |   |                      |                  |                         |   |     |
|---------|--|---|----------------------|------------------|-------------------------|---|-----|
|         |  |   |                      |                  |                         | no compliance with risk retention requirements of SECN; other.  |     |
| STSAP21 |  | Compliance at ABCP programme level with SECN 6 (transparency requirements)  | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.28R            | Confirmation that:<br>the sponsor is responsible for compliance with SECN 6.2;<br>the sponsor is complying with SECN 6.2 at the ABCP programme level;<br>the sponsor has made available to potential investors before pricing and upon their request: the aggregate information required by SECN 6.2.1R (1), and the information required by SECN 6.2.1R (2) to (5), at least in draft or initial form.   | N/A |
| STSAP22 |  | Drawdown of liquidity facility, where funding commitments of the liquidity facility are not renewed by the sponsor                    | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.29R            | A concise explanation from the sponsor as to whether the liquidity facility will be drawn down and the maturing securities are repaid in the event that the sponsor does not renew the funding commitment of the liquidity facility before its expiry.  | N/A |
| STSAP23 |  | Compliance of ABCP transactions within an ABCP programme with SECN 2.32R to SECN 2.3.9R and SECN 2.3.13R to SECN 2.3.22R              | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.30R            | Confirmation whether all ABCP transactions within the programme meet the following requirements:<br>-SECN 2.3.2R to SECN 2.3.9R.<br>-SECN 2.3.13R to SECN 2.3.22R.  | N/A |
| STSAP24 |  | Maximum of 5% of the aggregate amount of the exposures underlying the ABCP may temporarily be non-compliant with certain requirements | Detailed Explanation | {ALPHANUM}       | SECN 2.3.30R (2) to (3) | A detailed explanation as to which, if any, of the requirements of SECN 2.3.10R, 2.3.11R or 2.3.12R are temporarily not in compliance with and the percentage of the aggregate amount of the exposures underlying the ABCP transactions it represents and why the programme has temporarily breached those requirements.<br>Confirmation that a sample of the underlying exposures is subject to regular external verification of compliance by an appropriate independent party. | N/A |
| STSAP25 |  | Remaining weighted of the average life (WAL) in the underlying exposures of an ABCP programme shall not be more than two years        | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.31R            | Confirmation that the remaining weighted average life of the underlying exposures of an ABCP programme are not more than two years.   | N/A |

|         |  |   |                      |                  |                  |   |     |
|---------|--|---|----------------------|------------------|------------------|---|-----|
| STSAP26 |  | Fully supported ABCP programme (sponsor support)  | Concise Explanation  | {ALPHANUM-10000} | SECN 2.3.32R     | A concise explanation whether or not the ABCP programme is fully supported by a sponsor in accordance with SECN 2.3.24R.  | N/A |
| STSAP27 |  | No re-securitisation and no credit enhancement establishing a second layer of tranching at the ABCP programme level               | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.33R     | Confirmation that the ABCP programme does not contain any re-securitisation and that the credit enhancement does not establish a second layer of tranching at the programme level.  | N/A |
| STSAP28 |  | No call options   | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.34R     | Confirmation that the ABCP programme does not include call option or clauses with an effect of the securities' final maturity at the discretion of the seller, sponsor or SSPE.   | N/A |
| STSAP29 |  | Interest rate and currency risks at ABCP programme appropriately mitigated and documented   | Detailed Explanation | {ALPHANUM}       | SECN 2.3.35R     | A detailed explanation that measures are taken appropriately to mitigate interest rates and currency risks arising at ABCP programme level, and details of those measures, including whether the SSPE enters into derivative contracts other than for the reasons set out by SECN 2.3.35R. A description of how those derivatives are underwritten and documented, in particular whether it is done according to common standards in international finance. | N/A |
| STSAP30 |  | Requirements for the ABCP programme documentation (responsibilities of the trustee to investors)                                  | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.36R (1) | Confirmation that the responsibilities of the trustee and other entities with fiduciary duties, if any to investors are specified in the ABCP programme's documentation.  | N/A |
| STSAP31 |  | Requirements for the ABCP programme documentation (contractual obligations of the sponsor)  | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.36R (2) | Confirmation that the contractual obligations, duties and responsibilities of the sponsor, the trustee and other ancillary services providers, if any, are specified in the ABCP programme's documentation.   | N/A |
| STSAP32 |  | Requirements for the ABCP programme documentation (process and responsibilities in case of defaulted servicer)                    | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.36R (3) | Confirmation that the ABCP programme's documentation contains processes and responsibilities covering servicer default or insolvency to ensure servicing continuity.  | N/A |
| STSAP33 |  | Requirements for the ABCP programme documentation (provisions for replacement of derivatives counterparties and the account bank) | Confirmation         | {ALPHANUM-1000}  | SECN 2.3.36R (4) | Confirmation that the requirements under SECN 2.3.36R (4) are met regarding provisions for replacement of derivatives counterparties, and the account bank at ABCP programme level upon their default, insolvency and other specified   | N/A |

|         |  |   |                      |                 |                  |  |                                       |
|---------|--|---|----------------------|-----------------|------------------|--|---------------------------------------|
|         |  |   |                      |                 |                  | events, where the liquidity facility does not cover such events.   |                                       |
| STSAP34 |  | Requirements for the ABCP programme documentation (procedures to ensure collateralisation of the funding commitment)  | Confirmation         | {ALPHANUM-1000} | SECN 2.3.36R (5) | Confirmation that the ABCP programme's documentation contains procedures ensuring that upon specified events, defaults or insolvency of the sponsor, remedial step shall be provided for to achieve, as appropriate, collateralisation of the funding commitment or replacement of the liquidity facility provider. A statement indicating the relevant pages of the prospectus or other underlying documentation that contain the information relevant to the requirements set out in SECN 2.3.36R (5). | N/A                                   |
| STSAP35 |  | Requirements for the ABCP programme documentation (liquidity facility and maturing securities to be repaid where the sponsor does not renew the funding commitment of the liquidity facility before its expiry) | Confirmation         | {ALPHANUM-1000} | SECN 2.3.36R (6) | Confirmation that the ABCP programme's documentation contains provisions ensuring that the liquidity facility shall be drawn down and the maturing securities shall be repaid in the event that the sponsor does not renew the funding commitment of the liquidity facility before its expiry.<br><br>A statement indicating the relevant pages of the prospectus or other underlying documentation that contain the information relevant to the requirements set out in SECN 2.3.36R (6).               | N/A                                   |
| STSAP36 |  | Servicer expertise  | Detailed Explanation | {ALPHANUM}      | SECN 2.3.37R     | A detailed explanation of how the requirements of SECN 2.3.37R are met, including the policies and procedures ensuring compliance with these requirements.<br><br>A statement indicating the relevant pages of the prospectus or other underlying documentation that contain the applicable explanations to meet the requirements set out in SECN 2.3.37R (as applicable) ('servicer expertise, policies, procedures, and risk management').   | Item 3.2 of Annex 14.3R of PRM App 2. |

**2 Annex Private anonymised templates for STS notifications under SECN  
3R 2.6.1R(2)(b)**

*[Editor's note: insert link to 'Private anonymised templates for STS notifications under SECN 2.6.1R(2)(b).']*

## Non-ABCP securitisation

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME  | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN | BACKGROUND INFORMATION: (If appropriate, include a reference to the relevant sections of the underlying documentation where the information is available)  | ADDITIONAL INFORMATION |
|--------------|--------------------------------------|-------------------------------------|--|--------------------------------------|---|--|------------------------|
| STSS3        |                                      | Notification identifier             | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If reporting an update, the unique reference number assigned by the FCA to the previously notified STS notification.   | N/A                    |
| STSS4        |                                      | Unique identifier                   | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The unique identifier assigned by the reporting entity in accordance with SECN 11.12.1R.   | N/A                    |
| STSS9        |                                      | Securitisation classification       | N/A (General Information)  | {LIST}                               | N/A   | The type of securitisation (non-ABCP securitisation; ABCP transaction; or ABCP programme).   | N/A                    |
| STSS10       |                                      | Underlying exposures classification | N/A (General Information)  | {LIST}                               | N/A   | The type of underlying exposures including: residential loans that fall within SECN 2.4.1R(1)(a)(i); commercial loans that fall within SECN 2.4.1R(1)(a)(ii); credit facilities that fall within SECN 2.4.1R(1)(a)(iii); credit facilities, including loans and leases, provided to any type of enterprise or corporation; auto loans/leases; credit card receivables; trade receivables; 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                    |
| STSS12       |                                      | Notification date                   | N/A (General Information)  | {DATEFORMAT}                         | N/A   | The date of notification to the FCA or if prior to IP completion day, date of notification to ESMA.  | N/A                    |

## ABCP Transaction

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN | BACKGROUND INFORMATION: (If appropriate, include a reference to the relevant sections of the underlying documentation where the information is available) | ADDITIONAL INFORMATION |
|--------------|--------------------------------------|------------------------------------|--|--------------------------------------|---|---|------------------------|
| STSAT3       |                                      | Notification identifier            | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If reporting an update, the unique reference number assigned by the FCA to the previously notified STS notification.                                      | N/A                    |

|         |  |                                     |                           |                |     |  |     |
|---------|--|-------------------------------------|---------------------------|----------------|-----|--|-----|
| STSAT4  |  | Unique identifier                   | N/A (General Information) | {ALPHANUM-100} | N/A | The unique identifier assigned by the reporting entity to this ABCP transaction in accordance with SECN 11.12.2R.  | N/A |
| STSAT9  |  | Securitisation classification       | N/A (General Information) | {LIST}         | N/A | The type of securitisation (non-ABCP securitisation; ABCP transaction; or ABCP programme).   | N/A |
| STSAT10 |  | Underlying exposures classification | N/A (General Information) | {LIST}         | N/A | The type of underlying exposures including: residential loans that fall within SECN 2.4.1R(1)(a)(i); commercial loans that fall within SECN 2.4.1R(1)(a)(ii); credit facilities that fall within SECN 2.4.1R(1)(a)(iii); credit facilities, including loans and leases, provided to any type of enterprise or corporation; auto loans/leases; credit card receivables; trade receivables; 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 |
| STSAT12 |  | Notification date                   | N/A (General Information) | {DATEFORMAT}   | N/A | The date of notification to the FCA, or if prior to IP completion day, date of notification to ESMA.   | N/A |

## ABCP programme

| FIELD NUMBER | BOX TO COMPLETE FOR STS NOTIFICATION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: APPLICABLE EXPLANATION TYPE FOR THIS FIELD | BACKGROUND INFORMATION: FIELD FORMAT | PROVISION OF THE SECURITISATION REGULATIONS AND/OR SECN | BACKGROUND INFORMATION: (If appropriate, include a reference to the relevant sections of the underlying documentation where the information is available) | ADDITIONAL INFORMATION |
|--------------|--------------------------------------|------------------------------------|--|--------------------------------------|---|---|------------------------|
| STSAP3       |                                      | Notification identifier            | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | If reporting an update, the unique reference number assigned by the FCA to the previously notified STS notification.                                      | N/A                    |
| STSAP4       |                                      | Unique identifier                  | N/A (General Information)  | {ALPHANUM-100}                       | N/A   | The unique identifier assigned by the reporting entity to this ABCP programme in accordance with SECN 11.12.1R.   | N/A                    |
| STSAP9       |                                      | Securitisation classification      | N/A (General Information)  | {LIST}                               | N/A   | The type of securitisation (non-ABCP securitisation; ABCP transaction; or ABCP programme).  | N/A                    |
| STSAP11      |                                      | Notification date                  | N/A (General Information)  | {DATEFORMAT}                         | N/A   | The date of notification to the FCA, or if prior to IP completion day, date of notification to ESMA.  | N/A                    |

SECN 2 Annex 4R to SECN 2 Annex 6R are deleted in their entirety. The deleted text is not shown but the annexes are marked [deleted] as shown below.

**2 Annex ~~STS notification template for a non-ABCP securitisation~~ [deleted]  
4R**

**2 Annex ~~STS notification template for an ABCP transaction~~ [deleted]  
5R**

**2 Annex ~~STS notification template for an ABCP programme~~ [deleted]  
6R**

Amend the following as shown.

**4 Due diligence requirements**

...

**4.2 Before holding a securitisation position**

4.2.1 R (1) Prior to holding a *securitisation position*, an *institutional investor*, other than the *originator*, *sponsor* or *original lender*, ~~shall verify that must be satisfied that:~~

(a) ~~where the originator or original lender is established in the United Kingdom and is not a CRR firm or FCA investment firm, the originator or original lender grants all the credits giving rise to the underlying exposures (unless they are trade receivables not originated in the form of a loan) on the basis of:~~

- (i) ~~sound and well-defined criteria; and~~
- (ii) ~~clearly established processes for approving, amending, renewing and financing those credits,~~

~~and has effective systems in place to apply those criteria and processes, in accordance with SECN 8.2 (or equivalent PRA rules); [deleted]~~

(b) ~~where the originator or original lender is not established in the United Kingdom, the originator or original lender grants all the credits giving rise to the underlying exposures (unless they are trade receivables not originated in the form of a loan) on the basis of:~~

- (i) ~~sound and well-defined criteria; and~~
- (ii) ~~clearly established processes for approving, amending, renewing and financing those credits,~~

and has effective systems in place to apply those criteria and processes, to ensure that credit granting is based on a thorough assessment of the obligor's creditworthiness; [deleted]

- (c) if established in the United Kingdom, the originator, sponsor or original lender retains on an ongoing basis a material net economic interest in accordance with SECN 5 (or equivalent PRA rules) and the risk retention is disclosed to the institutional investor in accordance with SECN 6, SECN 11 and SECN 12 (or equivalent PRA rules); [deleted]
- (d) if not none of the originator, sponsor or original lender are established in the United Kingdom, the originator, sponsor or original lender retains one of them has and will maintain on an ongoing basis a material net economic interest which, in any event, must not be less than 5%, determined in accordance with SECN 5 (or equivalent PRA rules), and discloses the risk retention to institutional sufficient and appropriate alignment of commercial interest with the institutional investor in the performance of the securitisation; and
- (e) the originator, sponsor or SSPE has made available sufficient information to enable the institutional investor independently to assess the risks of holding the securitisation position, and has committed to make further information available on an ongoing basis, to enable the institutional investor to monitor the performance of the securitisation position and the underlying exposures as appropriate. That information must include at least the following:

|   | Information  | Frequency   |
|---|--|---|
| 1 | In the case of a securitisation which is not an ABCP programme or an ABCP transaction, details of the underlying exposures.  | At least quarterly.   |
| 2 | In the case of an ABCP programme or an ABCP transaction, information on the underlying receivables or credit claims.   | At least monthly.   |
| 3 | Investor reports providing periodic updates on: <ul style="list-style-type: none"> <li>(i) the credit quality and performance of the underlying exposures;</li> <li>(ii) any relevant financial or other triggers contained in the transaction documentation;</li> </ul> | (i) At least quarterly in the case of a securitisation which is not an ABCP programme or an ABCP transaction. |

|   |  |  |
|---|--|--|
|   | <p>including information on events which trigger changes to the priority of payments or a substitution of any counterparty to the transaction;</p> <p>(iii) data on the cash flows generated by the underlying exposures and by the liabilities of the securitisation; and</p> <p>(iv) the calculation and modality of retention of a material net economic interest in the transaction by the originator, sponsor or original lender.</p> | <p>(ii) At least monthly in the case of an ABCP programme or an ABCP transaction.</p>  |
| 4 | <p>All information on the legal documentation needed to understand the transaction, including detail of the legal provisions governing the structure of the transaction, any credit enhancement or liquidity support features, the cash flows and loss waterfalls, investors' voting rights, and any triggers or other events that could result in a material impact on the performance of the securitisation position.</p>                | <p>In the case of primary market investments:</p> <p>(i) before pricing or commitment to invest in draft or initial form;</p> <p>(ii) no later than 15 days after closing of the transaction in final form; and</p> <p>(iii) an updated version as soon as practicable following any material change.</p> <p>In the case of secondary market investments:</p> <p>(i) before a commitment to invest in final form; and</p> <p>(ii) an updated version as soon as practicable following any material change.</p> |
| 5 | <p>Information describing any changes or events materially affecting the transaction, including breaches of obligations under the transaction documents.</p>   | <p>As soon as practicable following that material change or event.</p>   |

|   |  |  |
|---|--|--|
| 6 | <p><del>Any approved prospectus or other offering or marketing document prepared with the cooperation of the originator or sponsor.</del></p>  | <p>In the case of primary market investments:</p> <p>(i) before pricing or commitment to invest in draft or initial form; and</p> <p>(ii) no later than 15 days after closing of the transaction in final form.</p> <p>In the case of secondary market investments, before a commitment to invest in final form.</p>   |
| 7 | <p><del>If there is an <i>STS notification</i> or a notification falling within regulation 12(3)(b) of the <i>Securitisation Regulations 2024</i> in respect of the transaction, that <i>STS notification</i> or that notification falling within regulation 12(3)(b) of the <i>Securitisation Regulations 2024</i>.</del></p> | <p>In the case of primary market investments:</p> <p>(i) before pricing or commitment to invest in draft or initial form;</p> <p>(ii) no later than 15 days after closing of the transaction in final form; and</p> <p>(iii) an updated version as soon as practicable following any material change.</p> <p>In the case of secondary market investments:</p> <p>(i) before a commitment to invest in final form; and</p> <p>(ii) an updated version as soon as practicable following any material change.</p> |

- 4.2.1A G The level and nature of the information made available in accordance with *SECN 4.2.1R(1)(e)* should be proportionate to the risk profile of the *securitisation position* and may include:
- (1) information on the underlying exposures, which may be made available in aggregated form for a *securitisation* of short-term highly granular underlying exposures;
  - (2) investor reports providing periodic updates on:
    - (a) all materially relevant data on the credit quality and performance of the underlying exposures;
    - (b) all materially relevant data on the risk characteristics of the underlying exposures;
    - (c) any relevant financial or other triggers contained in the transaction documentation, including information on events which trigger changes to the priority of payments or a substitution of any counterparty to the transaction;
    - (d) data on the cash flows generated by the underlying exposures and by the liabilities of the *securitisation*; and
    - (e) the calculation and/or modality of any applicable alignment of commercial interest in the performance of the *securitisation* retained by the *originator, sponsor or original lender*;
  - (3) all information on the legal documentation needed to understand the transaction, including detail of the legal provisions governing the structure of the transaction, any credit enhancement or liquidity support features, the cash flows and loss waterfalls, investors' voting rights, and any triggers or other events that could result in a material impact on the performance of the *securitisation position*;
  - (4) information describing any changes or events materially affecting the transaction, including breaches of obligations under the transaction documents;
  - (5) any approved prospectus or other offering or marketing document prepared with the cooperation of the *originator or sponsor*; and
  - (6) if there is an *STS notification* or a notification falling within regulation 12(3)(b) of the *Securitisation Regulations 2024* in respect of the transaction, that *STS notification* or that notification falling within regulation 12(3)(b) of the *Securitisation Regulations 2024*.

4.2.1B G For the purposes of *SECN 4.2.1R(1)(d)*, the *originator, sponsor or original lender* would maintain a sufficient and appropriate alignment of commercial interest in the performance of the *securitisation* if it:

- (1) retains on an ongoing basis a material net economic interest in the *securitisation* of not less than 5% determined in accordance with *SECN 5* (or equivalent *PRA rules*); or
- (2) maintains a material alignment of commercial interest through alternative means, such as management fees due to the *originator, sponsor or original lender* under the terms of the transaction documents that are linked to the performance of the *securitisation*.

4.2.2 R (1) Prior to holding a *securitisation position*, an *institutional investor*, other than the *originator, sponsor or original lender*, shall must carry out a due diligence assessment, which enables it to assess obtain a comprehensive and thorough understanding of the risks involved. That *Subject to SECN 4.3.1R*, that assessment shall must consider at least all of the following:

- (a) the risk characteristics of the individual *securitisation position* and of the underlying exposures;
- (b) all of the structural features of the *securitisation* that can materially impact the performance of the *securitisation position*, including the contractual priorities of payment and priority of payment related triggers, credit enhancements, liquidity enhancements, market value triggers, and transaction specific definitions of default; and
- (c) with regard to a *securitisation* included on the list maintained under regulation 10(2) of the *Securitisation Regulations 2024*, compliance with *SECN 2*; [deleted]
- (d) with regard to a *securitisation* that appears to the *institutional investor* to be an overseas STS *securitisation* as defined in regulation 12(2) of the *Securitisation Regulations 2024*, whether the *securitisation* falls within a description of *securitisation* specified in regulations made from time to time under regulation 13(1) of the *Securitisation Regulations 2024* in relation to a country or territory designated under such regulations; [deleted]
- (e) with regard to a *securitisation* falling within paragraph (3)(b) and (e) of regulation 12 of the *Securitisation Regulations 2024*, compliance with the requirements referred to in paragraph (3)(a) of that regulation and with Article 27 of the *Securitisation Regulation* as it had effect in relation to the EU at the time of the notification mentioned in paragraph (3)(b) of that regulation; [deleted]

- (f) ~~in considering the matter referred to in point (e), an *institutional investor* may rely to an appropriate extent on the *STS notification* and on the information disclosed by the *originator, sponsor* and *SSPE* concerning compliance with the *STS criteria*, without solely or mechanistically relying on that notification or information; and [deleted]~~
- (g) ~~in considering the matter referred to in point (d), an *institutional investor* may rely to an appropriate extent on the notification referred to in regulation 12(3)(b) of the *Securitisation Regulations 2024* and on the information disclosed by the *originator, sponsor* and *SSPE* to *ESMA* concerning compliance with the requirements referred to in regulation 12(3)(a) of the *Securitisation Regulations 2024*, without solely or mechanistically relying on that notification or information. [deleted]~~
- (h) where the *originator* or *original lender* is not a *CRR firm* or *FCA investment firm*, the credit granting standards and processes of the *originator* or *original lender* applicable to the underlying exposures (unless they are trade receivables not originated in the form of a loan).

...

4.2.2A G The level and nature of the due diligence assessment undertaken in accordance with *SECN 4.2.2R(1)* should be proportionate to the risk profile of the *securitisation position*.

4.2.2B G For the purposes of *SECN 4.2.2R(1)(b)*, structural features that can materially impact the performance of the *securitisation position* may include contractual priorities of payment and priority of payment-related triggers, credit enhancements, liquidity enhancements, market value triggers, and transaction-specific definitions of default.

### **4.3 Requirements on sponsors**

- 4.3.1 R (1) As regards *fully supported ABCP transactions* the requirement specified in *SECN 4.2.1R(1)(a)* shall apply *SECN 4.2.2R(1)(h)* applies to the *sponsor* and not to the *institutional investor*.
- (2) In such cases, ~~the sponsor must verify that where the originator or original lender which is not a CRR firm or an FCA investment firm grants all the credits giving rise to the underlying exposures (other than any underlying exposures that are trade receivables not in the form of a loan) on the basis of, the sponsor must consider the credit granting standards and processes of the originator or original lender applicable to the underlying exposures (unless they are trade receivables not originated in the form of a loan)~~
- (a) sound and well-defined criteria; and

- (b) ~~clearly established processes for their approving, amending, renewing and financing those credits,~~

~~and has effective systems in place to apply those criteria and processes, in accordance with SECN 8.2 (or equivalent PRA rules).~~

#### 4.4 While holding a securitisation position

4.4.1 R An *institutional investor*, other than the *originator*, *sponsor* or *original lender*, holding a *securitisation position*, ~~shall~~ must at least:

- (1) ~~establish appropriate written procedures that are proportionate to the risk profile of the securitisation position and, where relevant, to the institutional investor's trading and non-trading book in order to monitor, on an ongoing basis, compliance with SECN 4.2.1R and SECN 4.2.2R and the performance of the securitisation position and of the underlying exposures; Where relevant with respect to the securitisation and the underlying exposures, those written procedures shall include monitoring of:~~
- (a) ~~the exposure type;~~
  - (b) ~~the percentage of loans more than 30, 60 and 90 days past due;~~
  - (c) ~~default rates;~~
  - (d) ~~prepayment rates;~~
  - (e) ~~loans in foreclosure;~~
  - (f) ~~recovery rates;~~
  - (g) ~~repurchases;~~
  - (h) ~~loan modifications;~~
  - (i) ~~payment holidays;~~
  - (j) ~~collateral type and occupancy; and~~
  - (k) ~~frequency distribution of credit scores or other measures of creditworthiness across underlying exposures, industry and geographical diversification, frequency distribution of loan-to-value ratios with bandwidths that facilitate adequate sensitivity analysis;~~
- (2) ~~in the case of a securitisation other than a fully supported ABCP programme, regularly perform stress tests on the cash flows and collateral values supporting the underlying exposures or, in the absence of sufficient data on cash flows and collateral values,~~

- stress tests on loss assumptions, having regard to the nature, scale and complexity of the risk of the *securitisation position*;
- (3) in the case of *fully supported ABCP programmes*, regularly perform stress tests on the solvency and liquidity of the *sponsor*;
  - (4) ensure internal reporting to its management body so that the management body is aware of the material risks arising from the *securitisation position* and so that those risks are adequately managed;
  - (5) be able to demonstrate to the *FCA*, upon request, that it has a comprehensive and thorough understanding of the *securitisation position* and its underlying exposures and that it has implemented written policies and procedures for the risk management of the *securitisation position* and for maintaining records of the verifications and due diligence in accordance with *SECN 4.2.1R* and *SECN 4.3* and of any other relevant information; and
  - (6) in the case of exposures to a *fully supported ABCP programme*, be able to demonstrate to the *FCA*, upon request, that it has a comprehensive and thorough understanding of the credit quality of the *sponsor* and of the terms of the liquidity facility provided.

4.4.1A G The level and nature of monitoring undertaken in accordance with *SECN 4.4.1R* should be proportionate to the risk profile of the *securitisation position*. In considering what elements of a *securitisation* are relevant to monitor on an ongoing basis, an *institutional investor* may consider the following:

- (1) the exposure type;
- (2) the percentage of loans more than 30, 60 and 90 days past due;
- (3) default rates;
- (4) prepayment rates;
- (5) loans in foreclosure;
- (6) recovery rates;
- (7) repurchases;
- (8) loan modifications;
- (9) payment holidays;
- (10) collateral type and occupancy; and
- (11) frequency distribution of credit scores or other measures of creditworthiness across underlying exposures, industry and geographical diversification, frequency distribution of loan-to-

value ratios with bandwidths that facilitate adequate sensitivity analysis.

...

## 5 Requirements on risk retention

...

### 5.2 Retention of a material net economic interest

...

5.2.8 R (1) Only the following shall qualify as a retention of a material net economic interest of not less than 5% within the meaning of *SECN 5.2.1R*:

...

- (d) the retention of the *first loss tranche* and, where such retention does not amount to 5% of the nominal value of the securitised exposures, if necessary, other *tranches* having the same or a more severe risk profile than those transferred or sold to *investors* and not maturing any earlier than those transferred or sold to *investors*, so that the retention equals in total not less than 5% of the nominal value of the securitised exposures; or
- (e) the retention of a first loss exposure of not less than 5% of every securitised exposure in the *securitisation*; or
- (f) the retention of a percentage of the *first loss tranche* and, where such retention does not amount to 5% of the nominal value of the securitised exposures, the retention of a percentage of the nominal value of each of the other *tranches* sold or transferred or sold to *investors* (the same percentage to be applied to each such *tranche*), so that the combined retention is not less than 5% of the nominal value of the securitised exposures.

...

...

### 5.3 Retainers of material net economic interest

...

5.3.2 R Where more than one *originator* is eligible to fulfil the retention requirement, each *originator* shall must fulfil that requirement on a pro rata basis by reference to the securitised exposures for which it is the *originator*. Where *SECN 5.2.8R(1)(f)* is relied on for compliance with the retention requirement, all *originators* must retain pro rata the same

percentage of the *first loss tranche* and of the nominal value of the other *tranches* sold or transferred to *investors*.

- 5.3.3 R Where more than one *original lender* is eligible to fulfil the retention requirement, each *original lender* ~~shall~~ must fulfil that requirement on a pro rata basis by reference to the securitised exposures for which it is the *original lender*. Where SECN 5.2.8R(1)(f) is relied on for compliance with the retention requirement, all *original lenders* must retain pro rata the same percentage of the *first loss tranche* and of the nominal value of the other *tranches* sold or transferred to *investors*.

...

#### **5.4 Fulfilment of the retention requirement through a synthetic form of retention or contingent form or retention**

- 5.4.1 R (1) The fulfilment of An *originator*, *sponsor* or *original lender* may fulfil the retention requirement in *SECN 5.2* in a manner equivalent to one of the options set out in *SECN 5.2.8R* through a *synthetic or contingent form of retention* shall meet all of the following conditions provided that:
- (a) the amount retained is at least equal to the amount required under the option which the synthetic or contingent form of retention corresponds to; and
  - (b) the retainer has explicitly disclosed in the final offering document, prospectus, ~~transaction summary or overview of the main features of the securitisation or other transaction documentation~~ that it will retain a material net economic interest in the *securitisation* through a synthetic or contingent form of retention on an ongoing basis.
- (2) For the purposes of *SECN 5.4.1R(1)(b)* the retainer ~~shall~~ must disclose in the final offering document, prospectus ~~transaction summary or overview of the main features of the securitisation, or other transaction documentation~~ all the details on the applicable synthetic form of retention or contingent form of retention, including, the methodology used in its determination of the material net interest retained and an explanation on which of the options in ~~in~~ *SECN 5.2.8R* the retention is equivalent to.

...

...

Insert the following new section, *SECN 5.9A*, after *SECN 5.9* (Retention of a first loss exposure of not less than 5% of every securitised exposure). All the text is new and is not underlined.

#### **5.9A Retention of a portion of the first loss tranche and of a portion of the nominal value of each of the tranches sold or transferred to investors**

- 5.9A.1 R The combination of retained risk referred to in *SECN 5.2.8R(1)(f)* must be fulfilled by applying *SECN 5.8* to the retained portion of the *first loss tranche* referred to in *SECN 5.2.8R(1)(d)* and by applying *SECN 5.5* to the retained portion of the nominal value of each of the *tranches* sold or transferred to investors as referred to in *SECN 5.2.8R(1)(a)*.

Amend the following as shown.

### **5.17 Retention requirement on resecuritisations**

- 5.17.1 R ...
- (4) ~~The retranching by the securitisation's originator of an issued tranche into contiguous tranches shall not constitute a resecuritisation.~~  
~~[deleted]~~
- ...

### **5.19 Disclosure of the level of the commitment to maintain a net economic interest**

- 5.19.1 R (1) The retainer ~~shall~~ must disclose to *investors* within the final offering document, prospectus, ~~transaction summary or overview of the main features of the securitisation or other transaction documentation~~ at least the following information regarding the level of its commitment to maintain a net economic interest in the *securitisation*:
- ...
- (2) Where the exemptions referred to in *SECN 5.2.10R* and *SECN 5.2.11R* apply to a *securitisation* transaction, *firms* acting as *originator*, *sponsor* or *original lender* ~~shall~~ must disclose within the final offering document, prospectus, ~~transaction summary or overview of the main features of the securitisation or other transaction documentation~~ information on the applicable exemption to *investors*.
- (3) The disclosure referred to in (1) and (2) ~~shall~~ must be appropriately documented within the final offering document, prospectus, ~~transaction summary or overview of the main features of the securitisation or other transaction documentation~~ and made publicly available, except in bilateral or private transactions where private disclosure is considered by the parties to be sufficient. The inclusion of a statement on the retention commitment in the prospectus for the securities issued under the *securitisation programme* is an appropriate means of fulfilling the requirement.
- ...

## **6 Transparency requirements for originators, sponsors and SSPEs**

...

## 6.2 Provision of information to holders of a securitisation position about a securitisation

- 6.2.1 R The *originator, sponsor* and *SSPE* of a securitisation ~~shall~~ must, in accordance with *SECN 6.3, and SECN 11 and SECN 12*, make at least the following information available to holders of a *securitisation* position, ~~to the FCA and, upon request, to potential investors and the FCA~~:
- (1)
    - (a) for a non-ABCP securitisation, information on the underlying exposures on a quarterly basis as specified in SECN 11.3, or, in the case of asset backed commercial paper, information on the underlying receivables or credit claims on a monthly basis; or
    - (b) for a securitisation which is an ABCP programme or an ABCP transaction, information on the underlying receivables or credit claims in aggregated form on a monthly basis as specified in (5)(a) and (d) below, and in SECN 11.3.1R(6) where applicable;
  - (2) all underlying documentation essential for the understanding of the transaction, including but not limited to, where applicable, the following documents:
    - (a) the final offering document, or the prospectus or termsheet together with all of the closing transaction documents, excluding legal opinions; and
    - (b) for traditional securitisation, the asset sale agreement, assignment, novation or transfer agreement and any relevant declaration of trust; [deleted]
    - (c) the derivatives and guarantee agreements, as well as any relevant documents on collateralisation arrangements where the exposures being securitised remain exposures of the originator; [deleted]
    - (d) the servicing, back up servicing, administration and cash management agreements; [deleted]
    - (e) the trust deed, security deed, agency agreement, account bank agreement, guaranteed investment contract, incorporated terms or master trust framework or master definitions agreement or such legal documentation with equivalent legal value; [deleted]
    - (f) any relevant inter creditor agreements, derivatives documentation, subordinated loan agreements, start up loan agreements and liquidity facility agreements; and [deleted]

- (g) ~~a detailed description of the priority of payments of the securitisation; [deleted]~~
- (h) ~~the disclosure in relation to risk retention requirements pursuant to SECN 5.19.1R.~~
- (3) ~~where the rules in PRM do not require a prospectus to be drawn up, a transaction summary or overview of the main features of the securitisation, including, where applicable:~~
  - (a) ~~details regarding the structure of the deal, including the structure diagrams containing an overview of the transaction, the cash flows and the ownership structure;~~
  - (b) ~~details regarding the exposure characteristics, cash flows, loss waterfall, credit enhancement and liquidity support features;~~
  - (c) ~~details regarding the voting rights of the holders of a securitisation position and their relationship to other secured creditors; and~~
  - (d) ~~a list of all triggers and events referred to in the documents provided in accordance with SECN 6.2.1R(2) that could have a material impact on the performance of the securitisation position; [deleted]~~
- (4) in the case of *STS securitisations*, the *STS notification* referred to in SECN 2.5;
- (5) quarterly investor reports, or, in the case of ~~asset backed commercial paper~~ ~~a securitisation which is an ABCP programme or an ABCP transaction~~, monthly investor reports, ~~containing~~ ~~providing~~ ~~periodic updates on~~ at least the following:
  - (a) all materially relevant data on the credit quality and performance of underlying exposures in aggregated form;
  - (b) any relevant financial or other triggers contained in the transaction documentation, including information on events which trigger changes in the priority of payments or the ~~replacements~~ ~~a substitution~~ of any ~~counterparties~~, and, in the case of a ~~securitisation~~ which is not an ~~ABCP transaction~~ or ~~an ABCP programme~~, data on the cash flows generated by the underlying exposures and by the liabilities of the ~~securitisation~~ ~~counterparty to the transaction~~; and
  - (c) information about the risk retained, including information on which of the modalities provided for in ~~SECN 5.6.1R~~ ~~SECN 5.2.8R~~ has been applied, in accordance with ~~SECN 5~~, ~~SECN 11~~ and ~~SECN 12~~;

- (d) all materially relevant data on the risk characteristics of the underlying exposures in aggregated form;
- (e) information on the *tranches* in the *securitisation* or the *ABCP programme*, for each *tranche* or commercial paper issuance in the *securitisation* or *ABCP programme* or other instrument to which an *ISIN* has been assigned and for each subordinated loan in the *securitisation* or *ABCP programme*;
- (f) data on the cash flows of the liabilities of the *securitisation* and those generated by the underlying exposures;
- (g) where the *securitisation* is a synthetic non-*ABCP securitisation*, information on:
  - (i) synthetic coverage for as many protection arrangements as exist in the *securitisation*; and
  - (ii) issuer collateral for each individual collateral asset held by the *SSPE* on behalf of *investors* that exists for the given protection arrangement (each asset for which an *ISIN* exists must be treated as an individual collateral asset, cash collateral of the same currency must be aggregated and treated as an individual collateral asset, and cash collateral of different currencies must be reported as separate collateral assets);
- (h) where the *securitisation* is a collateralised loan obligation (CLO), information on the CLO manager involved in the *securitisation*;
- (i) where the *securitisation* is an *ABCP programme*, information on:
  - (i) *ABCP transactions*, for as many *ABCP transactions* that exist in the *ABCP programme* as at the data cut-off date; and
  - (ii) information on *ABCP programmes*, for as many *ABCP programmes* that, at the data cut-off date, are funding the *ABCP transactions* on which information is made available pursuant to (i) above;
- (j) information on accounts, for each account in the *securitisation* or, in the case of an *ABCP programme*, for each account in each *ABCP transaction*; and
- (k) information on counterparties, for each counterparty in the *securitisation* or in the case of an *ABCP programme*, for each counterparty in each *ABCP transaction*;

- (6) any inside information relating to the *securitisation* that the *originator, sponsor or SSPE* is obliged to make public in accordance with Article 17 of the *Market Abuse Regulation*; and
- (7) where *SECN 6.2.1R(6)* does not apply, any significant event, such as:
  - (a) a material breach of the obligations provided for in the documents made available in accordance with *SECN 6.2.1R(2)*, including any remedy, waiver or consent subsequently provided in relation to such a breach;
  - (b) a change in the structural features that can materially impact the performance of the *securitisation*;
  - (c) a change in the risk characteristics of the *securitisation* or of the underlying exposures that can materially impact the performance of the *securitisation*;
  - (d) in the case of *STS securitisations*, where the securitisation ceases to meet the *STS* requirements or where the *FCA* or *PRA* have taken remedial or administrative actions; and
  - (e) any material amendment to transaction documents.

6.2.1A R Where an *originator, sponsor and SSPE of a securitisation in respect of which there is no requirement to provide a prospectus under the rules in PRM* is obliged to provide information referred to in *SECN 6.2.1R(6)* and (7) to holders of a *securitisation* position, they must also provide that information to the *FCA* in the relevant templates specified in *SECN 6.4.2R* and *SECN 6 Annex 1R, SECN 6 Annex 2R, and SECN 6 Annex 3R*, in an electronic and machine-readable format.

- 6.2.2 R (1) The information described in *SECN 6.2.1R(1)* and *SECN 6.2.1R(5)* shall must be made available simultaneously as follows:
- (a) in the case of non-ABCP securitisations, each quarter at the latest one *month* after the due date for the payment of interest, with the data cut-off date not later than 2 months before the submission date; or,
  - (b) in the case of ABCP transactions and ABCP programmes, each month at the latest one *month* after the end of the period the report covers, with the data cut-off date not later than one month before the submission date.
- (2) The information described in *SECN 6.2.1R(2)*, ~~*SECN 6.2.1R(3)*~~ and *SECN 6.2.1R(4)* must be made available before pricing or original commitment to invest in draft or initial form. Final versions of this information must be made available at the latest ~~45~~ 30 days after closing of the transaction, or by the first scheduled interest payment date of the transaction if it falls within 30 days of closing of the transaction.

- (3) Where a *securitisation* transaction has a first interest period that exceeds 3 months, the information must be made available at the latest 1 month after the due date for the first payment of interest.
- 6.2.3 R In the case of ABCP the information described in *SECN 6.2.1R(1)*, *SECN 6.2.1R(3)(b)* and *SECN 6.2.1R(5)(a)* shall be made a *securitisation* which is an *ABCP programme* or an *ABCP transaction*, the *originator* must make available in aggregate form to *holders of securitisation positions* and, on request, to *potential investors*. *Loan level data* must be made available to the *sponsor* and, on request, to *information on the underlying receivables or credit claims at an individual exposure level* to *sponsors* and, upon request, to the *holders of a securitisation position*, *potential investors*, and the *FCA*. The information must be provided in an electronic and machine-readable format.
- 6.2.4 R Without prejudice to *Subject to* the provisions of the *Market Abuse Regulation*, the information described in *SECN 6.2.1R(6)* and *SECN 6.2.1R(7)* shall must be made available without delay.
- 6.2.5 R When complying with *SECN 6.2.1R*, the *originator*, *sponsor* and *SSPE* of a *securitisation* may provide the information specified in anonymised or aggregated form or, in relation to *SECN 6.2.1R(2)*, as a summary of the specified documentation, where and to the extent that anonymisation or aggregation is necessary in order to comply with the law applicable in the *United Kingdom* governing the protection of confidentiality of information and the processing of personal data and with any confidentiality obligation relating to customer, original lender original lender or debtor information.
- ...
- 6.3 Designation of securitisation repository a reporting entity**
- 6.3.1 R (1) The *originator*, *sponsor* and *SSPE* of a *securitisation* must designate one of their number (the ‘reporting entity’) to be the entity responsible for fulfilling the information requirements under *SECN 6.2.1R(1)*, *SECN 6.2.1R(2)*, *SECN 6.2.1R(4)*, *SECN 6.2.1R(5)*, *SECN 6.2.1R(6)*, and *SECN 6.2.1R(7)* and *SECN 6.4*.
- (2) Such designation does not relieve the other parties referred to in *SECN 6.3.1R* of their responsibilities under *SECN 6.2*.
- 6.3.2 R The reporting entity shall make the information for a *securitisation* transaction available by means of a *securitisation repository* registered by the *FCA*. [deleted]
- 6.3.3 R The obligations referred to in *SECN 6.3.2R* and *SECN 6.3.4R* shall not apply to *securitisations* for which the rules in *PRM* do not require a *prospectus* to be drawn up. [deleted]
- 6.3.4 R Where no *securitisation repository* is registered in accordance with regulation 14 of the *Securitisation Regulations 2024*, the The reporting entity

must make the information referred to in *SECN 6.3.1R(1)* available by means of a website that:

- (1) ~~includes~~ include a well-functioning data quality control system;
- (2) ~~is~~ are subject to appropriate governance standards and to maintenance and operation of an adequate organisational structure that ensures the continuity and orderly functioning of ~~the website~~ those means;
- (3) ~~is~~ are subject to appropriate systems, controls and procedures that identify all relevant sources of operational risk;
- (4) ~~includes~~ include systems that ensure the protection and integrity of the information received and the prompt recording of the information; and
- (5) ~~makes~~ make it possible to keep records of the information for at least 5 years after the maturity date of the *securitisation*.

- 6.3.5 R In relation to ~~SECN 6.3.2R~~ SECN 6.3.1R and *SECN 6.3.4R*, the ~~reporting entity and the securitisation repository where the information is made available shall be indicated in~~ originator, sponsor and SSPE of a securitisation must ensure that the documentation regarding the securitisation specifies the reporting entity and instructions on how to gain access to the means by which the information is to be made available.

Insert the following new section, SECN 6.4, and Annexes, SECN 6 Annex 1R, 2R and 3R, after SECN 6.3 (Designation of a reporting entity). All the text is new and is not underlined.

## 6.4 Notification requirements

- 6.4.1 R *SECN 6.4* applies to *securitisations* in respect of which there is no requirement to provide a prospectus under the *rules* in *PRM*.
- 6.4.2 R (1) Where an *originator, sponsor* or *SSPE* of a non-ABCP *securitisation* is established in the *United Kingdom*, such *originator, sponsor* and *SSPE* must send the information specified in the template in *SECN 6 Annex 1R* (either directly, or by designating one of their number to do so, without relieving the other parties of their obligations under this section).
- (2) Where a *sponsor* or an *SSPE* of an *ABCP programme* is established in the *United Kingdom*, the *sponsor* and the *SSPE* (and the *originator*, if also established in the *United Kingdom*) must send the information specified in the template in *SECN 6 Annex 2R* (either directly, or by designating one of their number to do so, without relieving the other parties of their obligations under this section).
- (3) Where neither the *sponsor* nor the *SSPE* of an *ABCP programme* is established in the *United Kingdom*, but an *originator, sponsor* or *SSPE* of an *ABCP transaction* within that *ABCP programme* is established in

the United Kingdom, the *originator, sponsor or SSPE* established in the United Kingdom must send the information specified in the template in *SECN 6 Annex 3R* (either directly, or by designating one of their number to do so, without relieving the other parties of their obligations under this section).

- (4) The information required by this *rule* must be provided to the *FCA* in the template specified in the relevant *SECN 6 Annex* in an electronic and machine-readable format.

6.4.3 R The information required in *SECN 6.4.2R* must be sent to the *FCA* at [private.securitisation@fca.org.uk](mailto:private.securitisation@fca.org.uk) and in accordance with the following timeframes:

- (1) the information provided in accordance with *SECN 6 Annex 1R* or *SECN 6 Annex 3R* must be sent within 1 week of each issuance of securities (or, in respect of non-ABCP *securitisations* and *ABCP transactions* which do not involve the issuance of securities, within 1 week of the creation of any new *securitisation positions*); and
- (2) the information provided in accordance with *SECN 6 Annex 2R* must be sent within 1 week of the first issuance of securities at the *ABCP programme* level (and must be filled in with respect to the *ABCP programme* including that issuance), and subsequently within 1 month of the first issuance of securities at the *ABCP programme* level following the inclusion of a new *originator* within the programme (and must be filled in with respect to the *ABCP programme* including that issuance).

## 6 Annex R Notification template for SECN 6.4.2R(1)

1

[Editor's note: insert link to 'Notification template for SECN 6.4.2R(1).']

### Main notification form for private securitisations that are non-ABCP securitisations

| FIELD NUMBER | COMPLETE FOR PRIVATE NON-ABCP-SECURITISATION | BACKGROUND INFORMATION: FIELD NAME            | BACKGROUND INFORMATION: FIELD FORMAT | BACKGROUND INFORMATION: FIELD DESCRIPTION   |
|--------------|--|---|--------------------------------------|---|
| SECPR1       |  | Full legal name of originator                 | {ALPHANUM-250}                       | Name of the originator of the private securitisation. Where there is no originator, this field may be left blank. In the case of securitisations with multiple originators the reporting entity shall provide the name of each originator involved in the transaction, separated with a semicolon (;). If no LEI is available this field may be left blank. |
| SECPR2       |  | Legal Entity Identifier (LEI) of originator   | {LEI}                                | The LEI of the originator. In the case of securitisations with multiple originators the reporting entity shall provide the LEI of each originator involved in the transaction, separated with a semicolon (;). If no LEI is available this field may be left blank.   |
| SECPR3       |  | Originator established in the United Kingdom? | {Y/N}                                | Fill in "Y" if any originator listed in SECPR1 is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.  |

|         |                         |  |                |  |
|---------|-------------------------|--|----------------|--|
| SECPR4  |                         | Full legal name of sponsor                   | {ALPHANUM-250} | Name of the sponsor of the private securitisation. Where there is no sponsor this field may be left blank. In the case of securitisations with multiple sponsors the reporting entity shall provide the name of each sponsor involved in the transaction, separated with a semicolon (;).  |
| SECPR5  |                         | Legal Entity Identifier (LEI) of sponsor     | {LEI}          | The LEI of the sponsor. In the case of securitisations with multiple sponsors the reporting entity shall provide the LEI of each sponsor involved in the transaction, separated with a semicolon (;). If no LEI is available this field may be left blank.   |
| SECPR6  |                         | Sponsor established in the United Kingdom?   | {Y/N}          | Fill in "Y" if any of the sponsors listed in SECPR4 is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.  |
| SECPR7  |                         | Full legal name of the SSPE                  | {ALPHANUM-250} | Name of the SSPE in the private securitisation. Where there is no SSPE, this field may be left blank. In the case of securitisations with multiple SSPEs the reporting entity shall provide the name of each SSPE involved in the transaction, separated with a semicolon (;).   |
| SECPR8  |                         | Legal Entity Identifier (LEI) of the SSPE    | {LEI}          | The LEI of the SSPE. In the case of securitisations with multiple SSPEs the reporting entity shall provide the LEI of each SSPE involved in the transaction, separated with a semicolon (;). If no LEI is available this field may be left blank.  |
| SECPR9  |                         | SSPE established in the United Kingdom?      | {Y/N}          | Fill in "Y" if the SSPE is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.  |
| SECPR10 |                         | STS (Simple Transparent Standardised) status | {Y/N}          | The originator and sponsor to indicate if the securitisation is: Y = STS or N = not STS.   |
| SECPR11 |                         | Securitisation name                          | {ALPHANUM-100} | Internal (alpha-numerical) code used by the reporting entity to identify the securitisation. The internal code shall be associated to the identifier of the securitisation.<br><br>For firms which submit reporting to the FCA or PRA under COREP, the name shall be the same as the entry in Column [020] IDENTIFIER OF THE SECURITISATION in C14.00. <sup>1</sup>  |
| SECPR12 | Non-ABCP securitisation | Securitisation classification                | {LIST}         | The type of securitisation:<br>-non-ABCP securitisation;<br>-ABCP transaction;<br>-ABCP programme.   |
| SECPR13 |                         | Underlying exposures classification          | {LIST}         | Enter in the type of underlying exposures of the securitisation. If multiple types from the list below are present, enter in 'Mixed' (with the exception of securitisations whose underlying exposures consist exclusively of a combination of consumer loans and automobile loans or leases--for these securitisations the value corresponding to 'Consumer loans' must be entered): Automobile Loan or Lease (ALOL)<br>Collateralised Loan Obligation of corporate underlying exposures (CLOS)<br>Consumer Loan (CONL)<br>Commercial Mortgage (CMRT)<br>Credit-Card Receivable (CCRR)<br>Lease (LEAS)<br>Residential Mortgage (RMRT)<br>Mixed (MIXD)<br>Mortgage Guarantee Scheme or similar private schemes (MGSS) <sup>2</sup><br>Small and Medium Enterprise (SMEL)<br>Non Small and Medium Enterprise Corporate (NSML)<br>Other (OTHR) |

|          |  |  |                |  |
|----------|--|--|----------------|--|
| SECPR14  |  | Total anticipated notional issuance                | {NUMBER}       | Sum (in reporting currency) of the anticipated notional amount of all securitisation positions created in the securitisation at origination. A single value in the reporting currency should be entered here. This should exclude swaps, liquidity facilities and similar types of positions which are super-senior and do not absorb credit risk in the securitisation.                                     |
|          |  |  |                | In the presence of any overlapping positions (as defined in Article 248(2) of the Securitisation (CRR) Part of the PRA Rulebook), only one of the positions should be included in the calculation of this field. For partially overlapping positions, the reporting entity may split the position into two parts and recognise the overlap in relation to one part in accordance with the previous sentence. |
| SECPR14A |  | Reporting currency                                 | {ALPHANUM-3}   | ISO-4217 code for the reporting currency used in SECPR14.  |
| SECPR15  |  | Currency of the notional amount                    | {ALPHANUM-3}   | ISO-4217 code for the currency in which the issuance notional amount is issued, where different from SECPR14A. If multiple currencies, enter "MXD".  |
| SECPR16  |  | Issue date   | {DATEFORMAT}   | The closing date of the most recent issuance, or the most recent date of creation of securitisation positions.   |
| SECPR17  |  | Lead contact email address                         | {ALPHANUM-100} | The company email address of lead contact for the securitisation. The email address does not have to be an account associated with a named individual.   |
| SECPR20  |  | Expected weighted average life of assets in months | {NUMBER}       | Enter the expected weighted average life of the underlying exposures of the securitisation at the origination of the securitisation transaction. The expected weighted average life should be stated in months.  |
| SECPR21  |  | Is this a resecuritisation?                        | {Y/N}          | Fill in "Y" if this notification refers to a resecuritisation. For the purposes of this field, "resecuritisation" means a securitisation whose underlying exposures include one or more securitisation positions.  |
| SECPR22  |  | Is this a synthetic securitisation?                | {Y/N}          | Fill in "Y" if this notification refers to a synthetic securitisation. For the purposes of this field, "synthetic securitisation" means a securitisation where the transfer of risk is achieved by the use of credit derivatives or guarantees, and the exposures being securitised remain exposures of the originator.  |

<sup>1</sup> Article 6(2) of Chapter 5 of the Reporting (CRR) Part of the PRA Rulebook

<sup>2</sup> MGSS notifications must be submitted on an aggregated annual basis, on or before February 11 of each year and must reflect the data of the securitisation position(s), as of December 31 of the previous year. Any securitisations that have been included in a resecuritisation can be excluded from the annual MGSS notification.

### Supplementary notification form for private securitisations that are non-ABCP securitisations (for information under SECN 6.2.1R (6) or (7))

| FIELD NUMBER | COMPLETE FOR PRIVATE NON-ABCP-SECURITISATION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: FIELD FORMAT | BACKGROUND INFORMATION: FIELD DESCRIPTION   |
|--------------|--|------------------------------------|--------------------------------------|---|
| SECPR11      |  | Securitisation name                | {ALPHANUM-100}                       | Internal (alpha-numerical) code used by the reporting entity to identify the securitisation. The internal code shall be associated to the identifier of the securitisation.<br><br>For firms which submit reporting to the FCA or PRA under COREP, the name shall be the same as the entry in Column [020] IDENTIFIER OF THE SECURITISATION in C14.00. <sup>1</sup> |
| SECPR18      |  | Inside information                 | {ALPHANUM-500}                       | Enter in free text any inside information pursuant to SECN 6.2.1R(6).   |

|         |  |                   |                |  |
|---------|--|-------------------|----------------|--|
| SECPR19 |  | Significant event | {ALPHANUM-500} | Enter in free text any significant event pursuant to SECN 6.2.1R(7). |
|---------|--|-------------------|----------------|--|

## 6 Annex R Notification Template for SECN 6.4.2R(2)

[Editor's note: insert link to 'Notification Template for SECN 6.4.2R(2)'.]

### Main notification form for private ABCP programme where the sponsor or SSPE of the ABCP programme is established in the United Kingdom

| FIELD NUMBER | COMPLETE FOR PRIVATE ABCP PROGRAMME | BACKGROUND INFORMATION: FIELD NAME  | BACKGROUND INFORMATION: FIELD FORMAT | BACKGROUND INFORMATION: FIELD DESCRIPTION   |
|--------------|-------------------------------------|---|--------------------------------------|---|
| SECPR1       |                                     | Full legal names of originator(s) established in the United Kingdom                               | {ALPHANUM}                           | Name of each originator established in the United Kingdom for ABCP transactions financed by the ABCP programme, separated with a semicolon (;). For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.   |
| SECPR2       |                                     | Legal Entity Identifier (LEI) of originator(s) established in the United Kingdom                  | {LEI}                                | The LEI of each originator established in the United Kingdom for ABCP transactions financed by the ABCP programme, separated with a semicolon (;). If no LEI is available this field may be left blank.   |
| SECPR3       |                                     | Originator established in the United Kingdom?   | {Y/N}                                | Fill in "Y" if any originator for an ABCP transaction financed by the ABCP programme is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.  |
| SECPR4       |                                     | Full legal name of sponsor for the ABCP programme   | {ALPHANUM-250}                       | Name of the sponsor of the ABCP Programme. Where there is no sponsor this field may be left blank. In the case of ABCP Programmes with multiple sponsors the reporting entity shall provide the name of each sponsor involved in the ABCP programme separated with a semicolon (;).   |
| SECPR5       |                                     | Legal Entity Identifier (LEI) of sponsor  | {LEI}                                | The LEI of the sponsor. In the case of ABCP Programmes with multiple sponsors the reporting entity shall provide the LEI of each sponsor involved in the programme, separated with a semicolon (;). If no LEI is available this field may be left blank.  |
| SECPR6       |                                     | Sponsor established in the United Kingdom?  | {Y/N}                                | Fill in "Y" if any of the sponsors listed in SECPR4 is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.   |
| SECPR6A      |                                     | Full legal name of sponsor established in the United Kingdom for ABCP transactions (if different) | {ALPHANUM-250}                       | Name of any sponsor established in the United Kingdom for any ABCP transactions within the ABCP programme, if different from the name reported in SECPR4. Where there is no sponsor this field may be left blank. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024. In the case of ABCP transaction with multiple sponsors the reporting entity shall provide the name of each sponsor involved in the ABCP programme separated with a semicolon (;). |
| SECPR6B      |                                     | Legal Entity Identifier (LEI) of sponsor for ABCP transactions                                    | {LEI}                                | The LEI of the sponsor named in SECPR6A. In the case of ABCP transactions with multiple sponsors the reporting entity shall provide the LEI of each sponsor involved in the transaction, separated with a semicolon (;). If no LEI is available   |

|         |                |  |                |  |
|---------|----------------|--|----------------|--|
|         |                |  |                | this field may be left blank.  |
| SECPR7  |                | Full legal name of the SSPE                  | {ALPHANUM-250} | Name of the SSPE for the ABCP Programme. Where there is no SSPE, this field may be left blank.<br>In the case of ABCP programmes with multiple SSPEs, the reporting entity shall provide the name of each SSPE involved in the programme, separated with a semicolon (:).  |
| SECPR8  |                | Legal Entity Identifier (LEI) of the SSPE    | {LEI}          | The LEI of the SSPE. In the case of programmes with multiple SSPEs the reporting entity shall provide the LEI of each SSPE involved in the programme, separated with a semicolon (:). If no LEI is available this field may be left blank.   |
| SECPR9  |                | SSPE established in the United Kingdom?      | {Y/N}          | Fill in "Y" if the SSPE is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.  |
| SECPR10 |                | STS (Simple Transparent Standardised) Status | {Y/N}          | The sponsor to indicate if the ABCP programme is: Y = STS or N = not STS.  |
| SECPR11 |                | Securitisation name                          | {ALPHANUM-100} | Internal (alpha-numerical) code used by the reporting entity to identify the ABCP programme. The internal code shall be associated to the identifier of the securitisation.<br><br>For firms which submit reporting to the FCA or PRA under COREP, the name shall be the same as the entry in Column [020] IDENTIFIER OF THE SECURITISATION in C14.00. <sup>1</sup>  |
| SECPR12 | ABCP programme | Securitisation classification                | {LIST}         | The type of securitisation:<br>-non-ABCP securitisation;<br>-ABCP transaction;<br>-ABCP programme.   |
| SECPR13 |                | Underlying exposures classification          | {LIST}         | Enter in the type of underlying exposures of the securitisation. If multiple types from the list below are present, for example where an ABCP programme is backed by a number of ABCP transactions in different classes, enter in 'Mixed' (with the exception of securitisations whose underlying exposures consist exclusively of a combination of consumer loans and automobile loans or leases-for these securitisations the value corresponding to 'Consumer loans' must be entered):<br>Automobile Loan or Lease (ALOL)<br>Consumer Loan (CONL)<br>Commercial Mortgage (CMRT)<br>Credit-Card Receivable (CCRR)<br>Lease (LEAS)<br>Residential Mortgage (RMRT)<br>Mixed (MIXD)<br>Small and Medium Enterprise (SMEL)<br>Non Small and Medium Enterprise Corporate (NSML)<br>Other (OTHR) |
| SECPR14 |                | Total anticipated notional issuance          | {NUMBER}       | Sum (in reporting currency) of the anticipated total of programme CP outstanding. A single value in the reporting currency should be entered here. This should exclude swaps, liquidity facilities and similar types of positions which are super-senior and do not absorb credit risk in the securitisation.<br><br>In the presence of any overlapping positions (as defined in Article 248(2) of the Securitisation (CRR) Part of the PRA Rulebook), only one of the positions should be included in the calculation of this field. For partially overlapping positions, the reporting entity may split the position into two  |

|          |  |  |                |   |
|----------|--|--|----------------|---|
|          |  |  |                | parts and recognise the overlap in relation to one part in accordance with the previous sentence.   |
| SECPR14A |  | Reporting currency                                 | {ALPHANUM-3}   | ISO-4217 code for the reporting currency used in SECPR14.   |
| SECPR15  |  | Currency of the notional amount                    | {ALPHANUM-3}   | ISO-4217 code for the currency in which the issuance notional amount is issued, where different from SECPR14A. If multiple currencies, enter "MXD".   |
| SECPR16  |  | Issue date   | {DATEFORMAT}   | The most recent date on which CP was issued by the programme.   |
| SECPR17  |  | Lead contact email address                         | {ALPHANUM-100} | The company email address of lead contact for the ABCP programme. The email address does not have to be an account associated with a named individual.  |
| SECPR20  |  | Expected weighted average life of assets in months | {NUMBER}       | Enter the expected weighted average life of the underlying exposures of the securitisation at the origination of the securitisation transaction. The expected weighted average life should be stated in months.   |
| SECPR21  |  | Is this a resecuritisation?                        | {Y/N}          | Fill in "Y" if this notification refers to a resecuritisation. For the purposes of this field, "resecuritisation" means a securitisation whose underlying exposures include one or more securitisation positions. |

<sup>1</sup> Article 6(2) of Chapter 5 of the Reporting (CRR) Part of the PRA Rulebook

### Supplementary notification form for private ABCP programme where the sponsor or SSPE of the ABCP programme is established in the United Kingdom (for information under SECN 6.2.1R (6) or (7))

| FIELD NUMBER | COMPLETE FOR PRIVATE ABCP PROGRAMME | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: FIELD FORMAT | BACKGROUND INFORMATION: FIELD DESCRIPTION   |
|--------------|-------------------------------------|------------------------------------|--------------------------------------|---|
| SECPR11      |                                     | Securitisation name                | {ALPHANUM-100}                       | Internal (alpha-numerical) code used by the reporting entity to identify the ABCP programme. The internal code shall be associated to the identifier of the securitisation.<br><br>For firms which submit reporting to the FCA or PRA under COREP, the name shall be the same as the entry in Column [020] IDENTIFIER OF THE SECURITISATION in C14.00. <sup>1</sup> |
| SECPR18      |                                     | Inside information                 | {ALPHANUM-500}                       | Enter in free text any inside information pursuant to SECN 6.2.1R(6).   |
| SECPR19      |                                     | Significant event                  | {ALPHANUM-500}                       | Enter in free text any significant event pursuant to SECN 6.2.1R(7).  |

### 6 Annex R Notification Template for SECN 6.4.2R(3) 3

[Editor's note: insert link to 'Notification Template for SECN 6.4.2R(3)'.]

### Main notification form for private ABCP transactions under an ABCP programme where neither the sponsor nor the SSPE of the ABCP programme is established in the United Kingdom

| FIELD NUMBER | COMPLETE FOR PRIVATE ABCP TRANSACTION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: FIELD FORMAT | BACKGROUND INFORMATION: FIELD DESCRIPTION |
|--------------|---------------------------------------|------------------------------------|--------------------------------------|---|
|--------------|---------------------------------------|------------------------------------|--------------------------------------|---|

|         |                  |   |                |   |
|---------|------------------|---|----------------|---|
| SECPR1  |                  | Full legal name of originator                 | {ALPHANUM-250} | Name of the originator for the ABCP transaction. Where there is no originator, this field may be left blank.<br>In the case of ABCP transactions with multiple originators the reporting entity shall provide the name of each originator involved in the transaction, separated with a semicolon (;).  |
| SECPR2  |                  | Legal Entity Identifier (LEI) of originator   | {LEI}          | The LEI of the originator. In the case of ABCP transactions with multiple originators, the reporting entity shall provide the LEI of each originator involved in the transaction, separated with a semicolon (;). If no LEI is available this field may be left blank.  |
| SECPR3  |                  | Originator established in the United Kingdom? | {Y/N}          | Fill in "Y" if any originator listed in SECPR1 is established in the United Kingdom.<br>For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.   |
| SECPR4  |                  | Full legal name of sponsor                    | {ALPHANUM-250} | Name of the sponsor of the ABCP transaction. Where there is no sponsor this field may be left blank.<br>In the case of ABCP transactions with multiple sponsors the reporting entity shall provide the name of each sponsor involved in the transaction, separated with a semicolon (;).  |
| SECPR5  |                  | Legal Entity Identifier (LEI) of sponsor      | {LEI}          | The LEI of the sponsor. In the case of ABCP transactions with multiple sponsors the reporting entity shall provide the LEI of each sponsor involved in the transaction, separated with a semicolon (;). If no LEI is available this field may be left blank.  |
| SECPR6  |                  | Sponsor established in the United Kingdom?    | {Y/N}          | Fill in "Y" if any of the sponsors listed in SECPR4 is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.   |
| SECPR7  |                  | Full legal name of SSPE                       | {ALPHANUM-250} | Name of the SSPE in the ABCP transaction. Where there is no SSPE, this field may be left blank.<br>In the case of ABCP transactions with multiple SSPEs the reporting entity shall provide the name of each SSPE involved in the transaction, separated with a semicolon (;).   |
| SECPR8  |                  | Legal Entity Identifier (LEI) of the SSPE     | {LEI}          | The LEI of the SSPE. In the case of ABCP transactions with multiple SSPEs the reporting entity shall provide the LEI of each SSPE involved in the transaction, separated with a semicolon (;). If no LEI is available this field may be left blank.   |
| SECPR9  |                  | SSPE established in the United Kingdom?       | {Y/N}          | Fill in "Y" if the SSPE is established in the United Kingdom. For the purposes of this field, "established in the United Kingdom" has the same meaning as in The Securitisation Regulations 2024.   |
| SECPR10 |                  | STS (Simple Transparent Standardised) Status  | {Y/N}          | The originator and sponsor to indicate if the securitisation is: Y = STS or N = not STS.  |
| SECPR11 |                  | Securitisation name                           | {ALPHANUM-100} | Internal (alpha-numerical) code used by the reporting entity to identify the ABCP transaction. The internal code shall be associated to the identifier of the securitisation.<br><br>For firms which submit reporting to the FCA or PRA under COREP, the name shall be the same as the entry in Column [020] IDENTIFIER OF THE SECURITISATION in C14.00. <sup>1</sup> |
| SECPR12 | ABCP transaction | Securitisation classification                 | {LIST}         | The type of securitisation:<br>-non-ABCP securitisation;  |

|          |  |  |                |  |
|----------|--|--|----------------|--|
|          |  |  |                | -ABCP transaction;<br>-ABCP programme.   |
| SECPR13  |  | Underlying exposures classification                | {LIST}         | Enter in the type of underlying exposures of the securitisation. If multiple types from the list below are present, enter in 'Mixed' (with the exception of securitisations whose underlying exposures consist exclusively of a combination of consumer loans and automobile loans or leases--for these securitisations the value corresponding to 'Consumer loans' must be entered):<br>Automobile Loan or Lease (AOL)<br>Consumer Loan (CONL)<br>Commercial Mortgage (CMRT)<br>Credit-Card Receivable (CCRR)<br>Lease (LEAS)<br>Residential Mortgage (RMRT)<br>Mixed (MIXD)<br>Small and Medium Enterprise (SMEL)<br>Non Small and Medium Enterprise Corporate (NSML)<br>Other (OTHR)  |
| SECPR14  |  | Total anticipated notional issuance                | {NUMBER}       | Sum (in reporting currency) of the anticipated notional amount of all securitisation positions created in the ABCP transaction at origination. A single value in the reporting currency should be entered here. This should exclude swaps, liquidity facilities and similar types of positions which are super-senior and do not absorb credit risk in the securitisation.<br><br>In the presence of any overlapping positions (as defined in Article 248(2) of the Securitisation (CRR) Part of the PRA Rulebook), only one of the positions should be included in the calculation of this field. For partially overlapping positions, the reporting entity may split the position into two parts and recognise the overlap in relation to one part in accordance with the previous sentence. |
| SECPR14A |  | Reporting currency                                 | {ALPHANUM-3}   | ISO-4217 code for the reporting currency used in SECPR14.  |
| SECPR15  |  | Currency of the notional amount                    | {ALPHANUM-3}   | ISO-4217 code for the currency in which the issuance notional amount is issued, where different from SECPR14A. If multiple currencies, enter "MXD".  |
| SECPR16  |  | Issue date   | {DATEFORMAT}   | The reporting entity shall provide the closing date of the most recent issuance, or the most recent date of creation of securitisation positions.  |
| SECPR17  |  | Lead contact email address                         | {ALPHANUM-100} | The company email address of lead contact for the securitisation. The email address does not have to be an account associated with a named individual.   |
| SECPR20  |  | Expected weighted average life of assets in months | {NUMBER}       | Enter the expected weighted average life of the underlying exposures of the securitisation at the origination of the securitisation transaction. The expected weighted average life should be stated in months.  |
| SECPR21  |  | Is this a resecuritisation?                        | {Y/N}          | Fill in "Y" if this notification refers to a resecuritisation. For the purposes of this field, "resecuritisation" means a securitisation whose underlying exposures include one or more securitisation positions.  |

<sup>1</sup> Article 6(2) of Chapter 5 of the Reporting (CRR) Part of the PRA Rulebook

**Supplementary notification form for private ABCP transactions under an ABCP programme where neither the sponsor nor the SSPE of the ABCP programme is established in the United Kingdom (for information under SECN 6.2.1R (6) or (7))**

| FIELD NUMBER | COMPLETE FOR PRIVATE ABCP TRANSACTION | BACKGROUND INFORMATION: FIELD NAME | BACKGROUND INFORMATION: FIELD FORMAT | BACKGROUND INFORMATION: FIELD DESCRIPTION   |
|--------------|---------------------------------------|------------------------------------|--------------------------------------|---|
| SECPR11      |                                       | Securitisation name                | {ALPHANUM-100}                       | Internal (alpha-numerical) code used by the reporting entity to identify the ABCP transaction. The internal code shall be associated to the identifier of the securitisation.<br><br>For firms which submit reporting to the FCA or PRA under COREP, the name shall be the same as the entry in Column [020] IDENTIFIER OF THE SECURITISATION in C14.00. <sup>1</sup> |
| SECPR18      |                                       | Inside information                 | {ALPHANUM-500}                       | Enter in free text any inside information pursuant to SECN 6.2.1R(6).   |
| SECPR19      |                                       | Significant event                  | {ALPHANUM-500}                       | Enter in free text any significant event pursuant to SECN 6.2.1R(7).  |

Amend the following as shown.

**7 Ban on resecuritisation**

...

**7.2 Securitisation positions as underlying exposures**

7.2.1 R (1) The underlying exposures used in a *securitisation* shall must not include *securitisation positions*.

(2) Paragraph (1) does not apply to:

- (a) any *securitisation* the securities of which were issued before 1 January 2019; or
- (b) any *securitisation* in respect of which the *FCA* has disapproved, modified or dispensed with (1) such that the underlying exposures may include *securitisation positions*;
- (c) subject to (3), a securitisation that solely comprises senior securitisation positions; or
- (d) subject to (3), securitisation positions that comprise both a single exposure and directly related credit protection that causes the credit risk of the exposure to be trashed.

(3) The derogations in (2)(c) and (d) may only be applied once and not in combination with each other and not to any further resecuritisation that involves the same underlying securitisation positions.

(4) The derogations in (2)(c) and (d) do not apply unless the originator of a resecuritisation is:

- (a) a *PRA-authorised person*; and
- (b) the *originator* and, for the purposes of Chapter 2, Article 6 of the *Securitisation Part of the PRA rules*, risk retainer of the *underlying securitisation*.

7.2.2 R ...

7.2.3 R The retranching by the *securitisation's originator* of an issued *tranche* into contiguous *tranches* (or of contiguous issued *tranches* into one or a fewer number of *tranches*) does not constitute a *resecuritisation*.

...

## 8 Criteria for credit granting

...

### 8.2 Granting of credit

8.2.1 R *Originators, sponsors and original lenders shall* must apply to exposures to be securitised (unless they are trade receivables not originated in the form of a loan) the same sound and well-defined criteria for credit-granting which they apply to non-securitised exposures. To that end, *originators, sponsors and original lenders* must apply the same clearly established processes for approving and (where relevant) amending, renewing and refinancing credits shall be applied.

8.2.1A R *Originators, sponsors and original lenders must ensure the criteria and processes that are applicable to securitised exposures are not less stringent than those applicable to comparable assets, if any, remaining on the balance sheet of the originator, sponsor or original lender or that would have applied were the assets to be held on the firm's balance sheet.*

8.2.2 R *Originators, sponsors and original lenders shall* must have effective systems in place to apply these the criteria and processes they maintain in compliance with SECN 8.2.1R and SECN 8.2.1AR in order to ensure credit-granting is based on a thorough assessment of the obligor's creditworthiness taking appropriate account of factors relevant to verifying the prospect of the obligor meeting the obligor's obligations under the credit agreement.

### 8.3 Verification arrangements

...

8.3.2 R Where an *originator* purchases a third party's exposures for its own account and then securitises them, that *originator* shall verify that the entity which was, directly or indirectly, involved in the original agreement which created the obligations or potential obligations to be securitised fulfils the requirements referred to in SECN 8.3.1R SECN 8.2 (or equivalent *PRA rules*).

...

SECN 9 is deleted in its entirety. The deleted text is not shown but the chapter is marked [deleted] as shown below.

## 9 Requirements on securitisation repositories [deleted]

Amend the following as shown.

### 11 Information and the details of a securitisation, which the originator, sponsor and SSPE must make available

#### 11.1 Application

- 11.1.1 GR This chapter applies to *originators, sponsors and SSPEs* which are not *PRA-authorised persons* and are *established in the United Kingdom*.
- 11.1.2 R ~~The requirements specified in SECN 11.3 to SECN 11.5 and SECN 11.10 to SECN 11.13 apply to all securitisations. [deleted]~~
- 11.1.3 R ~~The requirements specified in SECN 11.6 to SECN 11.9 apply to securitisations for which the rules in PRM require a prospectus to be drawn up. [deleted]~~

#### 11.2 Interpretation

- 11.2.1 R (1) For the purposes of SECN 11, the following definitions apply:
  - (a) ‘data cut-off date’ means the reference date of the information being reported in accordance with SECN 11;
  - (b) ‘active underlying exposure’ means an underlying exposure which, at the data cut-off date, may be expected to generate cash inflows or outflows in the future; and
  - (c) ‘inactive underlying exposure’ means an underlying exposure that has defaulted with no further recoveries expected or that has been redeemed, prepaid, cancelled, repurchased or substituted;
  - (d) ‘~~debt service coverage ratio~~’ means the annual rental income generated by commercial real estate that is wholly or partially financed by debt, net of taxes and net of any operational expenses to maintain the property’s value, relative to the annual combined interest and principal repayment on a borrower’s total debt over a given period on the loan secured by the property; [deleted]
  - (e) ‘~~interest coverage ratio~~’ means the gross annual rental income, before operational expenses and taxes, accruing from a buy-to-let property or the net annual rental income accruing from a commercial real estate property or set of properties relative to

~~the annual interest cost of the loan secured by the property or set of properties; [deleted]~~

- (f) ~~'medium enterprise' means an *enterprise* which employs fewer than 250 people and has an annual turnover not exceeding £50 million and/or an annual balance sheet total not exceeding £43 million; [deleted]~~
- (g) ~~'micro enterprise' means an *enterprise* which employs fewer than 10 people and has a turnover or annual balance sheet that does not exceed £2 million; and [deleted]~~
- (h) ~~'small enterprise' means an *enterprise* which employs fewer than 50 persons and whose annual turnover and/or balance sheet total does not exceed £10 million. [deleted]~~

11.2.2 G In the ~~SECN~~ 11 Annexes, any references to Regulation (EU) 2017/2402 and related technical standards and to specific Articles therein shall be read as referencing the *PRA rules* or ~~SECN~~ replacing the relevant provision. [deleted]

### 11.3 Information on underlying exposures

11.3.1 R This rule sets out the information required under ~~SECN~~ 6.2.1R(1) to be made available for a *securitisation*:

- (1) The If a non-ABCP *securitisation* falls within one of the categories set out below, except where it comprises a single underlying exposure, the information to be made available for a non-ABCP *securitisation* pursuant to ~~SECN~~ 6.2.1R(1) ~~SECN~~ 6.2.1R(1)(a) is specified in the following annexes:
  - (a) ~~SECN~~ 11 Annex 2R for loans to private households secured by residential real estate, regardless of the purpose of those loans;
  - (b) ~~SECN~~ 11 Annex 3R for loans for the purposes of acquiring commercial real estate or secured by commercial real estate; [deleted]
  - (c) ~~SECN~~ 11 Annex 4R ~~SECN~~ 11 Annex 4AR for corporate underlying exposures, including underlying exposures to micro, small and medium-sized enterprises of collateralised loan obligations;
  - (d) ~~SECN~~ 11 Annex 5R for automobile underlying exposures, including both loans and leases to legal or natural persons backed by automobiles;
  - (e) ~~SECN~~ 11 Annex 6R for consumer underlying exposures; and
  - (f) ~~SECN~~ 11 Annex 7R for credit card underlying exposures; [deleted]
  - (g) ~~SECN~~ 11 Annex 8R for leasing underlying exposures; and

- (h) ~~SECN 11 Annex 9R for underlying exposures that do not fall within any of the categories set out in (a) to (g). [deleted]~~
- (2) ~~For the purposes of (1)(a), 'residential real estate' means any immovable property, available for dwelling purposes (including buy-to-let housing or property), acquired, built or renovated by a private household and that is not qualified as commercial real estate. [deleted]~~
- (3) ~~For the purposes of (1)(b), 'commercial real estate' means any income-producing real estate, either existing or under development, and excludes social housing and property owned by end users. [deleted]~~
- (4) ~~A property that has mixed commercial and residential use must, where possible, be treated as 2 separate properties: 1 commercial and 1 residential. Where it is not possible to separate the uses in this manner, the property must be treated as being entirely residential or entirely commercial, whichever is the dominant use of the property. [deleted]~~
- (5) The information to be made available for a non-ABCP *securitisation* of loans for the purposes of acquiring commercial real estate or secured by commercial real estate pursuant to SECN 6.2.1R(1)(a) must include at least:
  - (a) the *securitisation* unique identifier assigned in accordance with SECN 11.12.1R;
  - (b) information on the underlying loans including contractual loan terms, swap information if applicable, loan performance information, metrics indicating loan repayment capacity and any applicable covenants which apply at loan level as well as the status of those covenants;
  - (c) information on tenants including occupancy information, number of tenants and weighted average lease terms, as well as information on each of the 3 largest tenants, measured as the total annual rent payable by each tenant, per property, including descriptive tenant information, rent payable and lease expiry dates; and
  - (d) information on loan security including descriptive property information, property valuation information, property income information, property expenses information and lien position held by originator on the property.
- (6) The information to be made available for a *securitisation* of credit card or other short-term highly granular underlying exposures pursuant to SECN 6.2.1R(1) must include at least:
  - (a) the *securitisation* unique identifier assigned in accordance with SECN 11.12.1R;

- (b) tables presenting stratification data in aggregated form including all materially relevant data on the credit quality and performance of the underlying exposures including delinquencies and delinquency roll rates; and
  - (c) tables presenting stratification data in aggregated form including all materially relevant data on the risk characteristics of the underlying exposures.
- (7) The information to be made available for a *securitisation of corporate underlying exposures which is not a collateralised loan obligation and whose underlying exposures are not short-term highly granular exposures* pursuant to *SECN 6.2.1R(1)* must include at least:
- (a) the *securitisation unique identifier* assigned in accordance with *SECN 11.12.1R*;
  - (b) information on the underlying loans including contractual loan terms, debt type and seniority, loan or bond identifiers if applicable, swap information if applicable, loan performance information, and any applicable covenants which apply at loan level as well as the status of those covenants;
  - (c) information on each borrower including industry, geographic region, and essential information from the borrower's financial statements to enable an assessment of the borrower's loan repayment capacity; and
  - (d) information on loan security including descriptions of collateral and guarantees, collateral valuation information, information on the type of charge which exists over the collateral and the lien position held by the originator in relation to the collateral.
- (8) For underlying exposures of non-ABCP *securitisations* that do not fall within any of the categories set out in (1) to (7), the information to be made available pursuant to *SECN 6.2.1R(1)(a)* for a *securitisation* must include at least:
- (a) the *securitisation unique identifier* assigned in accordance with *SECN 11.12.1R*;
  - (b) information on contractual terms of the underlying exposures, swap information if applicable, obligor information, performance information, metrics indicating repayment capacity and any applicable triggers or tests which apply at underlying exposure level as well as the status of those triggers or tests; and
  - (c) information on loan security, if applicable, including descriptions of collateral and guarantees, collateral valuation information and lien position held by *originator* on the collateral.

- 11.3.1A R For the purposes of *SECN 11.3.1R*:
- (1) In *SECN 11.3.1R(1)(a)*, ‘residential real estate’ means any immovable property, available for dwelling purposes (including buy-to-let housing or property), acquired, built or renovated by a private household and that is not qualified as commercial real estate.
  - (2) In *SECN 11.3.1R(5)*, ‘commercial real estate’ means any income-producing real estate, either existing or under development, and excludes social housing and property owned by end-users.
  - (3) A property that has mixed commercial and residential use must, where possible, be treated as 2 separate properties: 1 commercial and 1 residential. Where it is not possible to separate the uses in this manner, the property must be treated as being entirely residential or entirely commercial, whichever is the dominant use of the property.
- 11.3.1B G Tables presenting stratification data described in *SECN 11.3.1R(6)(b)* may include categories of data such as the number of accounts and total receivables grouped appropriately, for example by delinquency age or by payment behaviour. Delinquency roll rates showing progression of delinquencies through time may also be included. Tables presenting stratification data described in *SECN 11.3.1R(6)(c)* may include categories of data such as number of accounts and total receivables grouped appropriately, for example by account balance size, credit limit, interest rate, account age, geographic region, market segment, credit score groupings or employment status.
- 11.3.2 R
- (1) Except as provided in (2) and (3), where a non-ABCP *securitisation* includes more than one of the types of underlying exposures listed in *SECN 11.3.1R*, the *reporting entity* for that *securitisation* must make available the information specified in the applicable annex required by that provision for each underlying exposure type.
  - (2) Where the pool of underlying exposures for a non-ABCP *securitisation* entirely comprises automobile underlying exposures, the information specified in *SECN 11 Annex 5R* must be provided in respect of the entire pool, regardless of whether the automobile underlying exposures are loans or leases.
  - (3) Except in the circumstances contemplated in (2), where the pool of underlying exposures for a non-ABCP *securitisation* entirely comprises leasing underlying exposures, the information specified in *SECN 11 Annex 8R* must be provided in respect of the entire pool.
- 11.3.3 R
- The *reporting entity* for a non-performing exposure an *NPE securitisation*, except where it comprises a single underlying exposure, must make available the information specified in:
- (1) the annexes referred to in *SECN 11.3.1R(1)(a) to (h)* *SECN 11.3.1R*, as relevant to the underlying exposure type; and

- (2) *SECN 11 Annex 10R.*
- 11.3.4 R ~~For the purposes of *SECN 11.3.3R*, a ‘non performing exposure securitisation’ means a non-ABCP *securitisation*, the majority of whose active underlying exposures, measured in terms of outstanding principal balance as at the data cut-off date, are one of the following:~~
- (1) ~~non performing exposures as referred to in paragraphs 213 to 239 of Annex V, Part 2, to Commission Implementing Regulation (EU) No 680/2014 as this provision had effect immediately before *IP completion day*;~~
- (2)
- (a) ~~credit impaired financial assets as defined in Appendix A to International Financial Reporting Standard 9 in Commission Regulation (EC) No 1126/2008 as this provision had effect immediately before *IP completion day*;~~
- (b) ~~credit impaired financial assets as defined in Appendix A to International Financial Reporting Standard 9 as contained in UK adopted international accounting standards;~~
- (c) ~~financial assets accounted for as credit impaired under national rules applying the Generally Accepted Accounting Principles (GAAP) based on Council Directive 86/635/EEC; or~~
- (d) ~~financial assets accounted for as credit impaired under UK generally accepted accounting principles. [deleted]~~
- 11.3.5 R ~~The reporting entity for an ABCP transaction must make available the information specified in *SECN 11 Annex 11R*. [deleted]~~
- 11.3.6 G-R ~~Where a *securitisation* is both a non-ABCP *securitisation* and an ABCP *transaction*, the appropriate reporting entity or reporting entities should make available the required information under *SECN 11.3.1R* to *SECN 11.3.4* *SECN 11.3.3R* and the required information under *SECN 11.3.5* *SECN 6.2.1R*, on a monthly basis at the latest 1 month after the end of the period the information covers, with the data cut-off date not later than 1 month before the submission date.~~
- 11.3.7 R The information to be made available pursuant to *SECN 11.3* must be on:
- (1) active underlying exposures as at the data cut-off date;
- (2) inactive underlying exposures that were active underlying exposures at the immediately preceding data cut-off date.
- 11.3.8 G (1) ~~A reporting entity intending to make information available in accordance with *SECN 11.3* and *SECN 11 Annex 2R* may be aware that the Bank of England has a loan level data template for residential mortgages for the purposes of assessing eligible collateral for Sterling Monetary Framework market operations (‘Residential~~

Mortgages/Residential Mortgage Backed Securities (RMBS) data template’).

- (2) If a reporting entity chooses to use that template as a format for making available the information required by *SECN 11 Annex 2R*, it should ensure that it provides, alongside that template (within the same file, on an additional tab), any information required by *SECN 11 Annex 2R* which is not included in that template. This could include, for example, the information specified in fields AR237SECN to AR246SECN of *SECN 11 Annex 2R*, to be shown alongside fields AR1 (Pool Cut-off Date) and AR3 (Loan Identifier) of *SECN 11 Annex 2R*.
- (3) The Bank of England may change the template without notice. The reporting entity is responsible for ensuring it makes the required information available.

- 11.3.9 R For the purposes of *SECN 11.3* and *SECN 11 Annexes 2R, 5R, 6R, 8R and 10R*, the reporting entity will be treated as having complied with those provisions if instead it makes information available via templates which are duly completed and compliant with the requirements in Commission Delegated Regulation (EU) 2020/1224 and Commission Implementing Regulation (EU) 2020/1225 as in force on 16 February 2026, which provide for disclosure of underlying exposure templates applicable to the corresponding asset class.

*SECN 11.4* is deleted in its entirety. The deleted text is not shown but the section is marked [deleted] as shown below.

#### **SECN 11.4 Information on investor reports [deleted]**

Amend the following as shown.

#### **11.5 Information granularity**

- 11.5.1 R (1) The reporting entity must make available the information specified in *SECN 11 Annexes 2R, 4AR, 5R, 6R, 8R and to 10R and 12R* on the following:

...

- (c) tenants, for each of the 3 largest tenants occupying a commercial real estate property, measured as the total annual rent payable by each tenant occupying the property; [deleted]

...

- (f) tests/events/triggers, for each test/event/trigger that triggers changes in the priority of payments or the replacement of any counterparties which are applicable to individual underlying exposures and their status.

...

- (3) For the purposes of (1)(b), each property acting as security for loans referred to in *SECN 11.3.1R(1)(a)* and ~~(b) (5)~~ must be treated as a single item of collateral.

11.5.2 R ~~The reporting entity must make available the information specified in *SECN 11 Annexes 11R and 13R* on the following:~~

- (1) ~~ABCP transactions, for as many ABCP transactions that exist in the ABCP programme as at the data cut off date;~~
- (2) ~~each ABCP programme that is funding the ABCP transactions for which information is made available pursuant to (1), as at the data cut off date;~~
- (3) ~~tests/events/triggers, for each test/event/trigger in the ABCP transaction or ABCP programme that triggers changes in the priority of payments or the replacement of any counterparties; and~~
- (4) ~~underlying exposures, for each ABCP transaction on which information is made available pursuant to (1) and for each exposure type that is present in that ABCP transaction as at the data cut off date, in accordance with the list in field IVALS in *SECN 11 Annex 11R*. [deleted]~~

*SECN 11.6* to *SECN 11.9* are deleted in their entirety. The deleted text is not shown but the sections are marked [deleted] as shown below.

**11.6 Item codes [deleted]**

**11.7 Inside information [deleted]**

**11.8 Information on significant events [deleted]**

**11.9 Information granularity [deleted]**

Amend the following as shown.

**11.10 Information completeness and consistency**

- 11.10.1 R The information made available pursuant to *SECN 6* and ~~this chapter~~ *SECN 11* must be complete and consistent.
- 11.10.2 R Where the *reporting entity* identifies factual errors in any information that it has made available pursuant to *SECN 6* and ~~this chapter~~ *SECN 11*, it must make available, without undue delay, a corrected report of all information about the *securitisation* required under *SECN 6* and ~~this chapter~~ *SECN 11*.
- 11.10.3 R Where permitted in the corresponding annex, the *reporting entity* ~~may~~ must report ~~one of the following~~ 'No Data Option' ('ND') ~~as the~~ values ~~corresponding to the reason justifying the unavailability of~~ ~~value where~~ the information ~~to be made~~ is not available:

- (1) ~~value ‘ND1’, where the required information has not been collected because it was not required by the lending or underwriting criteria at the time of origination of the underlying exposure;~~
- (2) ~~value ‘ND2’, where the required information has been collected at the time of origination of the underlying exposure but is not loaded into the reporting system of the *reporting entity* at the data cut-off date;~~
- (3) ~~value ‘ND3’, where the required information has been collected at the time of origination of the underlying exposure but is loaded into a separate system from the reporting system of the *reporting entity* at the data cut-off date;~~
- (4) ~~value ‘ND4 YYYY MM DD’, where the required information has been collected but it will only be possible to make it available at a date taking place after the data cut-off date. ‘YYYY MM DD’ must respectively refer to the numerical year, month, and day corresponding to the future date on which the required information will be made available; and~~
- (5) ~~value ‘ND5’, where the required information is not applicable to the item being reported.~~

- 11.10.4 R (1) For the purposes of *SECN 11.10.3R*, the report of any ND values must not be used to circumvent the requirements in this chapter *SECN 11*.
- (2) On request by the *FCA*, or the *PRA* or the Pensions Regulator, the *reporting entity* must provide details of the circumstances that justify the use of those ND values.

*SECN 11.11* is deleted in its entirety. The deleted text is not shown but the section is marked [deleted] as shown below.

## **11.11 Information timeliness [deleted]**

*SECN 11.13* is deleted in its entirety. The deleted text is not shown but the section is marked [deleted] as shown below.

## **11.13 Classifications reporting [deleted]**

Insert the following new section, *SECN 11.14*, after *SECN 11.3*. All the text is new and is not underlined.

## **11.14 Format of information**

- 11.14.1 R The information provided under *SECN 11* must be made available in an electronic and machine-readable format.

SECN 11 Annex 1 is deleted in its entirety. The deleted text is not shown but the annex is marked [deleted] as shown below.

**11 ~~Classifications reporting and item codes~~ [deleted]**  
**Annex 1**

SECN 11 Annex 2 is deleted in its entirety and replaced with the following. The text is not underlined.

*[Editor's note: the form that currently forms part of SECN 11 Annex 2 is to be marked as 'superseded'.]*

**11 Underlying exposures information – Residential real estate (RRE)**  
**Annex 2**

11 Annex R *[Editor's note: insert link to document containing 'Underlying exposures information - Residential real estate (RRE)'.]*

## SECN 11 Annex 2: Underlying exposures - residential real estate

| Field Number | Priority  | TAG     | Field Name                   | Category             | Data Type    | Field Definition & Criteria   | Data Type / Format | Maximum Length | Jurisdictions |
|--------------|-----------|---------|------------------------------|----------------------|--------------|---|--------------------|----------------|---------------|
| AR1          | Mandatory | dynamic | Pool Cut-off Date            | Core                 | Date         | Pool or Portfolio cut-off date. All dates take DD-MM-YYYY format.   | DD-MM-YYYY         | 10             | All           |
| AR3          | Mandatory | static  | Loan Identifier              | Core                 | Text/Numeric | Unique identifier (ID) for each loan. The loan ID should not change through the life of the transaction. If the original loan ID cannot be maintained in this field enter the original ID followed by the new ID, comma delimited.  | Text/Numeric       | 50/15          | All           |
| AR7          | Mandatory | static  | Borrower Identifier          | Core                 | Text/Numeric | Unique identifier (ID) per borrower (not showing the real name) - to enable borrowers with multiple loans in the pool to be identified (e.g. further advances / second liens are shown as separate entries). Should not change over the life of the transaction.<br>If more than one borrower list the Borrower ID's comma delimited with primary borrower first. | Text/Numeric       | 50/15          | All           |
| AR8          | Mandatory | static  | Property Identifier          | Core                 | Text/Numeric | Unique identifier per property to enable properties with multiple loans in the pool to be identified (e.g. further advances / second liens are shown as separate entries).  | Text/Numeric       | 50/15          | All           |
| AR15         | Optional  | static  | Borrower Type                | Borrower Information | List         | The type of borrower IND - individual<br>COM - commercial<br>SCI - Société Civile Immobilière<br>ND - No Data   | List               | 3              | All           |
| AR21         | Mandatory | static  | Borrower's Employment Status | Borrower Information | List         | Employment status of the primary applicant: Employed or full loan is guaranteed (1)<br>Employed with partial support (company subsidy) (2) Protected life-time employment (Civil/government servant) (3) Unemployed (4)<br>Self-employed (5)<br>No employment, borrower is legal entity (6) Student (7)<br>Pensioner (8)<br>Other (9)<br>No Data (ND)             | List               | 2              | All           |
| AR23         | Optional  | static  | Right to Buy                 | Borrower Information | Y / N / ND   | Right to Buy (RTB) flag   | Y / N / ND         | 2              | UK Only       |

|      |           |         |  |                      |         |   |            |    |         |
|------|-----------|---------|--|----------------------|---------|---|------------|----|---------|
| AR24 | Optional  | static  | Right to Buy Price                               | Borrower Information | Numeric | Purchase price of RTB property  | 9(11).99   | 14 | UK Only |
| AR26 | Mandatory | static  | Primary Income                                   | Borrower Information | Numeric | Primary borrower underwritten gross annual income (not rent)  | 9(11).99   | 14 | All     |
| AR27 | Mandatory | static  | Income Verification for Primary Income           | Borrower Information | List    | Income verification for primary income: Self-certified no checks (1)<br>Self-certified with affordability confirmation (2) Verified (3)<br>Non-Verified Income (4)<br>Other (5)<br>No Data (ND)   | List       | 2  | All     |
| AR28 | Mandatory | static  | Secondary Income                                 | Borrower Information | Numeric | Secondary borrower underwritten gross annual income (not rent – if single borrower then 0). When there are more than two borrowers indicate total annual combined income                          | 9(11).99   | 14 | All     |
| AR29 | Mandatory | static  | Income Verification for Secondary Income         | Borrower Information | List    | Income verification for secondary income: Self-certified no checks (1)<br>Self-certified with affordability confirmation (2) Verified (3)<br>Non-Verified Income (4)<br>Other (5)<br>No Data (ND) | List       | 2  | All     |
| AR30 | Optional  | static  | Resident   | Borrower Information | List    | Whether borrower is resident of the country: Resident less than 3 years (1)<br>Resident >= 3 years (2)<br>Not Resident (3) No Data (ND)   | List       | 2  | All     |
| AR55 | Mandatory | static  | Loan Origination Date                            | Loan Characteristics | Date    | Date of original loan advance   | QQ-YYYY    | 7  | All     |
| AR56 | Mandatory | dynamic | Date of Loan Maturity                            | Loan Characteristics | Date    | The date of loan maturity   | QQ-YYYY    | 10 | All     |
| AR57 | Mandatory | static  | Account Status Date                              | Loan Characteristics | Date    | Date which account came into securitised portfolio (important for replenishable pools)  | DD-MM-YYYY | 10 | All     |
| AR58 | Mandatory | static  | Origination Channel / Arranging Bank or Division | Loan Characteristics | Text    | Origination channel, arranging bank or division for the loan: Office / branch network (1)<br>Central / Direct (2) Broker (3)<br>Internet (4)<br>Packager (5) No Data (ND)                         | Text       | 2  | All     |

|      |           |        |                        |                      |         |  |         |    |                  |
|------|-----------|--------|------------------------|----------------------|---------|--|---------|----|------------------|
| AR59 | Mandatory | static | Purpose                | Loan Characteristics | List    | Loan purpose. Permissible answers: Purchase (1)<br>Re-mortgage (2)<br>Renovation (3)<br>Equity release (4)<br>Construction (5)<br>Debt consolidation (6)<br>Other (7)<br>Re-mortgage with Equity Release (8) Re-mortgage on Different Terms (9)<br>Combination Mortgage (10)<br>Investment Mortgage (11)<br>Right to Buy (12)<br>Government Sponsored Loan (13) SCPI (14)<br>Besson (15)<br>Perissol (16)<br>DOM (Défiscalisation Métropole) (17) Other (18)<br>No Data (ND) | List    | 2  | All              |
| AR60 | Optional  | static | Shared Ownership       | Loan Characteristics | List    | Shared Ownership flag: Not Shared Ownership (1)<br>Central Government Scheme (2) Local Government Scheme (3)<br>Housing Associations (4)<br>Building Developers (5)<br>Other (6)<br>No Data (ND)   | List    | 2  | All except Spain |
| AR61 | Mandatory | static | Loan Term              | Loan Characteristics | Numeric | Original contractual term (number of months)   | Numeric | 2  | All              |
| AR62 | Optional  | static | Principal Grace Period | Loan Characteristics | Numeric | Period, in months, from the origination date of the loan during which only interest and no principal is payable. After this period the loan switches to both interest and principal payments.<br>If no data available specify No Data (ND)   | 2       | 12 | All              |
| AR64 | Optional  | static | Subsidy                | Loan Characteristics | Y/N     | Is the loan repayment subsidised by an external party?<br>If no data available specify No Data (ND)  | Y/N     | 1  | All              |

|      |           |         |                            |                      |              |  |          |    |     |
|------|-----------|---------|----------------------------|----------------------|--------------|--|----------|----|-----|
| AR65 | Mandatory | static  | Loan Currency Denomination | Loan Characteristics | Text/Numeric | Loan currency denomination:<br>EUR (1)<br>GBP (2)<br>USD (3)<br>ANG (4)<br>BGN (5)<br>CYP (6)<br>CZK (7)<br>DKK (8)<br>EEK (9)<br>HUF (10)<br>LTL (11)<br>LVL (12)<br>MTL (13)<br>PLN (14)<br>RON (15)<br>SEK (16)<br>No Data (ND)   | List     | 2  | All |
| AR66 | Mandatory | static  | Original Balance           | Loan Characteristics | Numeric      | Original loan balance (inclusive of fees)  | 9(11).99 | 14 | All |
| AR67 | Mandatory | dynamic | Current Balance            | Loan Characteristics | Numeric      | Amount of loan outstanding as of pool cut off date, This should include any amounts that are secured by the mortgage and will be classed as principal in the transaction. For example if fees have been added to the loan balance and are part of the principal in the transaction these should be added. Excluding any interest arrears or penalty amounts. | 9(11).99 | 14 | All |
| AR70 | Mandatory | static  | Payment Frequency          | Loan Characteristics | List         | Frequency of payments due, i.e. number of months between payments: Monthly (1)<br>Quarterly (2)<br>Semi annually (3)<br>Annual (4)<br>Bullet (5)<br>Other (6)<br>No Data (ND)  | List     | 2  | All |
| AR71 | Mandatory | dynamic | Payment Due                | Loan Characteristics | Numeric      | Periodic contractual payment due (the payment due if there are no other payment arrangements in force)   | 9(8).99  | 11 | All |

|      |           |         |                            |                      |         |   |           |    |     |
|------|-----------|---------|----------------------------|----------------------|---------|---|-----------|----|-----|
| AR72 | Mandatory | static  | Payment Type               | Loan Characteristics | List    | Principal payment type:<br>Annuity (1)<br>Linear (2)<br>Increasing instalments (3)<br>Fixed instalments (changing maturity) with structural protection (4) Fixed instalments (changing maturity) without structural protection (5) Bullet (6)<br>Bullet + Savings deposit (7) Bullet + Life insurance (8) Bullet + Investment portfolio (9)<br>Bi-annual (10)<br>Tri-annual (11)<br>Offset mortgage (12)<br>Other (13)<br>No Data (ND)  | List      | 2  | All |
| AR73 | Optional  | static  | Debt to Income             | Loan Characteristics | Numeric | Debt to Income (DTI) ratio with definition and calculation. For combined income.<br><br>Debt defined as the Amount of loan outstanding as of pool cut off date, This should include any amounts that are secured by the mortgage and will be classed as principal in the transaction. For example if fees have been added to the loan balance and are part of the principal in the transaction these should be added. Excluding any interest arrears or penalty amounts.<br><br>Income defined as combined income, sum of primary and secondary income fields (field numbers 34 and 35) | 9(4).9(8) | 13 | All |
| AR74 | Optional  | static  | Type of Guarantee Provider | Loan Characteristics | List    | Indicate guarantee provider, if applicable:<br>No Guarantor (1)<br>Individual - Family<br>Relation (2) Individual - Other (3) Government (4)<br>Bank (5)<br>Insurance Product (6)<br>Nationale Hypotheek Garantie (NHG) Guarantee Scheme (Netherlands) (7) Fonds de Garantie de l'Accession Sociale (FGAS) (8)<br>Caution (France) (9)<br>Other (10)<br>No Data (ND)  | List      | 2  | All |
| AR80 | Optional  | dynamic | Prior Balances             | Loan Characteristics | Numeric | Total balances ranking prior to this loan (including those held with other lenders)   | 9(11).99  | 14 | All |

|       |           |         |   |                      |         |   |                 |    |                             |
|-------|-----------|---------|---|----------------------|---------|---|-----------------|----|-----------------------------|
| AR82  | Optional  | dynamic | Pari Passu Loans                        | Loan Characteristics | Numeric | Total value of loans ranking pari passu with loan (not included in this pool)   | 9(11).99        | 14 | All                         |
| AR84  | Mandatory | static  | Lien                                    | Loan Characteristics | List    | Seniority on liquidation of property: 1st Lien (1)<br>2nd Lien (2)<br>3rd Lien (3)<br>Other (4)<br>No Data (ND)   | List            | 2  | All                         |
| AR87  | Mandatory | dynamic | Maximum Balance                         | Loan Characteristics | Numeric | For loans with flexible re-draw facilities – the maximum loan amount that could potentially be outstanding i.e. Current Balance adjusted for flexible features or committed further lending (reunderwritten further advances are not within scope).   | 9(11).99        | 14 | All except Italy            |
| AR98  | Optional  | dynamic | Pre-payment Date                        | Loan Characteristics | Date    | Last pre-payment date   | DD-MM-YYYY / ND | 10 | All                         |
| AR99  | Optional  | dynamic | Pre-payment Penalties                   | Loan Characteristics | Numeric | Cumulative amount of pre-payment penalties paid to date   | 9(11).99        | 14 | All except Italy            |
| AR100 | Mandatory | dynamic | Cumulative Pre-payments                 | Loan Characteristics | Numeric | Cumulative amount of pre-payments to date   | 9(11).99        | 14 | All                         |
| AR101 | Optional  | dynamic | Amount of pre-payments allowed per year | Loan Characteristics | Numeric | Percentage amount of pre-payments allowed under the product per year. This is for mortgages that allow a certain threshold of pre-payments (i.e. 10%) before charges are incurred   | 9(4).9(8)       | 13 | All except France and Italy |
| AR102 | Mandatory | dynamic | Offset Savings Balance                  | Loan Characteristics | Numeric | For offset mortgage products, this field must be completed with the offset savings balance for the linked account.  | 9(11).99        | 14 | All                         |
| AR103 | Optional  | static  | Original Percentage Owned               | Loan Characteristics | Numeric | For shared ownership or shared equity products, the original percentage owned by the borrower must be populated in this field as a decimal (e.g. 50% should be shown as 0.50).  | 9(4).9(8)       | 13 | All except Spain            |
| AR104 | Optional  | dynamic | Current Percentage Owned                | Loan Characteristics | Numeric | For shared ownership or shared equity products, the current percentage owned by the borrower must be populated in this field as a decimal (e.g. 50% should be shown as 0.50).   | 9(4).9(8)       | 13 | All except Spain            |
| AR105 | Optional  | static  | Help to Buy Scheme Type                 | Loan Characteristics | List    | For Help to Buy loans, the complete the field by selecting from the following list: Help to Buy 1 (Equity) (1)<br>Help to Buy 2 (MIG) (2)<br>Other (3)<br>No or not applicable (4)  | List            | 2  | UK only                     |
| AR107 | Mandatory | static  | Interest Rate Type                      | Interest Rate        | List    | Interest rate type:<br>Floating rate loan (for life) (1)<br>Floating rate loan linked to SONIA, Euribor, BoE reverting to the Bank's standard variable rate (SVR), ECB reverting to Bank's SVR (2)<br>Fixed rate loan (for life) (3)<br>Fixed with future periodic resets (4)<br>Fixed rate loan with compulsory future switch to floating (5) Capped (6) | List            | 2  | All                         |

|       |           |         |                              |               |           |  |                 |    |     |
|-------|-----------|---------|------------------------------|---------------|-----------|--|-----------------|----|-----|
|       |           |         |                              |               |           | Discount (7)<br>Other (8)<br>No Data (ND)  |                 |    |     |
| AR108 | Mandatory | dynamic | Current Interest Rate Index  | Interest Rate | List      | Current interest rate index (the reference rate off which the mortgage interest rate is set): 1 month EURIBOR (2)<br>3 month EURIBOR (4)<br>6 month EURIBOR (6)<br>12 month EURIBOR (8)<br>BoE Base Rate (9)<br>SONIA (9A)<br>ECB Base Rate (10)<br>Standard Variable Rate (11) Other (12)<br>No Data (ND) | List            | 2  | All |
| AR109 | Mandatory | dynamic | Current Interest Rate        | Interest Rate | Numeric   | Current interest rate (%).   | 9(4).9(8)       | 13 | All |
| AR110 | Mandatory | dynamic | Current Interest Rate Margin | Interest Rate | Numeric   | Current interest rate margin (for fixed rate loans this is the same as the current interest rate, for floating rate loans this is the margin over (or under if input as a negative) the index rate   | 9(4).9(8)       | 13 | All |
| AR111 | Mandatory | dynamic | Interest Rate Reset Interval | Interest Rate | Numeric   | The interval in months at which the interest rate is adjusted (for floating loans)   | Numeric         | 2  | All |
| AR112 | Mandatory | static  | Interest Cap Rate            | Interest Rate | Numeric   | Interest rate cap (%).   | 9(4).9(8)       | 13 | All |
| AR113 | Mandatory | dynamic | Interest Revision Date 1     | Interest Rate | Date / ND | Date interest rate next changes (e.g. discount margin changes, fixed period ends, loan re-fixed etc. this is not the next floating rate index reset date)  | DD-MM-YYYY / ND | 10 | All |
| AR114 | Mandatory | dynamic | Revision Margin 2            | Interest Rate | Numeric   | The margin for the loan at the 2nd revision date   | 9(4).9(8)       | 13 | All |
| AR115 | Mandatory | dynamic | Interest Revision Date 2     | Interest Rate | Date / ND | Date of 2nd interest rate change   | DD-MM-YYYY / ND | 10 | All |
| AR116 | Mandatory | dynamic | Revision Margin 3            | Interest Rate | Numeric   | The margin for the loan at the 3rd revision date   | 9(4).9(8)       | 13 | All |
| AR117 | Mandatory | dynamic | Interest Revision Date 3     | Interest Rate | Date / ND | Date of 3rd interest rate change   | DD-MM-YYYY / ND | 10 | All |
| AR118 | Mandatory | dynamic | Revised Interest Rate Index  | Interest Rate | List      | Next interest rate index. Using codes as per field AR108   | List            | 2  | All |
| AR119 | Mandatory | dynamic | Revised Interest Rate Margin | Interest Rate | Numeric   | Next interest rate margin  | 9(4).9(8)       | 13 | All |

| AR122 | Optional  | static  | Restructuring Arrangement | Performance           | Y / N / ND | Has the loan been restructured?   | Y / N / ND | 2     | All |
|-------|-----------|---------|---------------------------|-----------------------|------------|---|------------|-------|-----|
| AR123 | Optional  | dynamic | Forbearance Type          | Performance           | List       | This field should be populated with Forbearance Type for loans currently subject to a forbearance arrangement. This field should be populated in conjunction with Restructuring Arrangement (AR122) and Performance Arrangement Date (AR173). With the following list type:<br>Term extension (including maturity roll over for interest only loans) (1)<br>Temporary transfer to IO (2)<br>Permanent transfer to IO (3)<br>Arrears capitalisation (4)<br>Payment arrangement (5)<br>Non contractual payment holiday (6)<br>Other (7)<br>Multiple forbearance options exercised (8)<br>Not in forbearance (9)   | List       | 2     | All |
| AR128 | Mandatory | static  | Geographic Region         | Property & Collateral | List       | The region description of where the property is located.  | List       | 3     | All |
| AR129 | Optional  | static  | Property Postcode         | Property & Collateral | Text       | The first 1 or 2 characters representing the postcode area is acceptable. Do not supply the full postcode.  | Text       | 3 (4) | All |
| AR130 | Mandatory | static  | Occupancy Type            | Property & Collateral | List       | Type of property occupancy:<br>Owner-occupied (1)<br>Partially owner-occupied (A property which is partly rented) (2)<br>Non-owner-occupied/buy-to-let (3)<br>Holiday/second home (4)<br>No Data (ND)   | List       | 2     | All |
| AR131 | Mandatory | static  | Property Type             | Property & Collateral | List       | Property type:<br>Residential (House, detached or semi-detached) (1)<br>Residential (Flat/Apartment) (2)<br>Residential (Bungalow) (3)<br>Residential (Terraced House) (4)<br>Multifamily house (properties with more than four units securing one loan) with recourse to the borrower (5)<br>Multifamily house without recourse to the borrower (6)<br>Partially commercial use (property is used as a residence as well as for commercial use where less than 50% of its value derived from commercial use, e.g. doctor's surgery and house) (7)<br>Commercial/business use with recourse to the borrower (8) | List       | 2     | All |

|              |           |         |                          |                       |         |   |            |    |     |
|--------------|-----------|---------|--------------------------|-----------------------|---------|---|------------|----|-----|
|              |           |         |                          |                       |         | Commercial/business use without recourse to the borrower (9)<br>Land Only (10)<br>Other (11)<br>No Data (ND)  |            |    |     |
| <b>AR135</b> | Mandatory | static  | Original Loan to Value   | Property & Collateral | Numeric | Originator's original underwritten Loan To Value ratio (LTV). For 2nd lien loans this should be the combined or total LTV.  | 9(4).9(8)  | 13 | All |
| <b>AR136</b> | Mandatory | static  | Valuation Amount         | Property & Collateral | Numeric | Property value as of date of latest loan advance prior to a securitisation.<br>Valuation amounts should be in the same currency as the loan (field AR65).   | 9(11).99   | 14 | All |
| <b>AR137</b> | Mandatory | static  | Original Valuation Type  | Property & Collateral | List    | Valuation type at origination:<br>Full, internal and external inspection (1) Full, only external inspection (2)<br>Drive-by (3)<br>AVM (flag as AVM only if this type of valuation has been used for origination purposes) (4) Indexed (5)<br>Desktop (6)<br>Managing Agent / Estate Agent (7) Tax Authority (8)<br>Other (9)<br>No Data (ND) | List       | 2  | All |
| <b>AR138</b> | Mandatory | static  | Valuation Date           | Property & Collateral | Date    | Date of latest property valuation at time of latest loan advance prior to a securitisation.   | DD-MM-YYYY | 10 | All |
| <b>AR141</b> | Mandatory | dynamic | Current Loan to Value    | Property & Collateral | Numeric | Originator's current Loan to Value ratio (LTV). For 2nd lien loans this should be the combined or total LTV   | 9(4).9(8)  | 13 | All |
| <b>AR143</b> | Mandatory | dynamic | Current Valuation Amount | Property & Collateral | Numeric | Most recent valuation amount (if e.g. at repossession there were multiple valuations, this should reflect the lowest). If no update, specify as No Data (ND). Valuation amounts should be in the same currency as the loan (field AR65)   | 9(11).99   | 14 | All |

|       |           |         |  |                       |              |   |            |    |         |
|-------|-----------|---------|--|-----------------------|--------------|---|------------|----|---------|
| AR144 | Mandatory | dynamic | Current Valuation Type                       | Property & Collateral | List         | Valuation type at origination:<br>Full, internal and external inspection (1) Full, only external inspection (2) Drive-by (3) AVM (flag as AVM only if this type of valuation has been used for origination purposes) (4) Indexed (5) Desktop (6) Managing Agent / Estate Agent (7) Tax Authority (8) Other (9) No Data (ND)   | List       | 2  | All     |
| AR145 | Mandatory | dynamic | Current Valuation Date                       | Property & Collateral | Date         | The date of most recent valuation   | DD-MM-YYYY | 10 | All     |
| AR151 | Optional  | static  | Date of Sale                                 | Property & Collateral | Date         | The date of sale of the foreclosed property   | DD-MM-YYYY | 10 | All     |
| AR154 | Optional  | static  | Gross Annual Rental Income                   | Property & Collateral | Numeric      | Gross Annual Rental income for Buy To Let (BTL) properties  | 9(11).99   | 14 | All     |
| AR156 | Optional  | static  | Debt Service Coverage Ratio                  | Property & Collateral | Text/Numeric | For Buy to Lets the Debt Service Coverage Ratio (DSCR) - Monthly Gross Rental Income divided by the Mortgage Payment<br>For borrowers the DSCR is the Monthly Income divided by the Mortgage Payment.   | 9(11).99   | 14 | All     |
| AR162 | Mandatory | dynamic | Current Energy Performance Certificate Value | Property & Collateral | List         | Latest current Energy Performance Certificate (EPC) rating for the property:<br>Energy Performance Certificate A (A)<br>Energy Performance Certificate B (B)<br>Energy Performance Certificate C (C)<br>Energy Performance Certificate D (D)<br>Energy Performance Certificate E (E)<br>Energy Performance Certificate F (F)<br>Energy Performance Certificate G (G)<br>Confirmed that property is not required to have EPC rating (NR)<br>Unknown / no data (ND) | List       | 2  | UK only |
| AR166 | Mandatory | dynamic | Account Status                               | Performance           | List         | Current status of account:<br>Performing (1)<br>Arrears (2)<br>Default or Foreclosure (3)<br>Redeemed (4)<br>Repurchased by Seller (5) Other (6)  | Numeric    | 2  | All     |

|              |           |         |                                     |                      |            |  |            |    |                    |
|--------------|-----------|---------|-------------------------------------|----------------------|------------|--|------------|----|--------------------|
|              |           |         |                                     |                      |            | No Data (ND)   |            |    |                    |
| <b>AR168</b> | Optional  | dynamic | Date Last in Arrears                | Performance          | Date / ND  | Date the borrower was last in arrears. If the borrower is current the date they were last in arrears.<br>If no data available specify No Data (ND)   | DD-MM-YYYY | 10 | All                |
| <b>AR169</b> | Mandatory | dynamic | Arrears Balance                     | Performance          | Numeric    | Current balance of arrears. Arrears defined as: Total payments due to date LESS Total payments received to date LESS any amounts capitalised. This should not include any fees applied to the account  | 9(8).99    | 11 | All                |
| <b>AR170</b> | Mandatory | dynamic | Number Months in Arrears            | Performance          | Numeric    | Number of months this loan is in arrears (at pool cut off date) according to the definition of the issuer  | Numeric    | 3  | All                |
| <b>AR173</b> | Mandatory | dynamic | Performance Arrangement             | Performance          | Date       | The date when the borrower had an arrangement put in place to reduce the balance of any arrears whilst maintaining their current payment.<br>If no data available specify No Data (ND).  | DD-MM-YYYY | 10 | All                |
| <b>AR174</b> | Mandatory | dynamic | Litigation                          | Performance          | Y / N / ND | Flag to indicate litigation proceedings underway (if account has recovered and is no longer being actively litigated this should be re-set to N)   | Y / N / ND | 2  | All except Holland |
| <b>AR175</b> | Mandatory | dynamic | Redemption Date                     | Performance          | Date       | Date on which account redeemed   | DD-MM-YYYY | 10 | All                |
| <b>AR177</b> | Mandatory | dynamic | Default or Foreclosure              | Performance          | Numeric    | Total default amount before the application of sale proceeds and recoveries.   | 9(8).99    | 11 | All                |
| <b>AR178</b> | Mandatory | dynamic | Date of Default                     | Performance          | Numeric    | The date of default or foreclosure.  | DD-MM-YYYY | 10 | All                |
| <b>AR179</b> | Mandatory | dynamic | Sale Price                          | Performance          | Numeric    | Price achieved on sale of property in case of foreclosure  | 9(11).99   | 14 | All                |
| <b>AR180</b> | Mandatory | dynamic | Loss on Sale                        | Performance          | Numeric    | Total loss net of fees, accrued interest etc. after application of sale proceeds (excluding prepayment charge if subordinate to principal recoveries). Show any gain on sale as a negative number  | 9(11).99   | 14 | All                |
| <b>AR181</b> | Mandatory | dynamic | Cumulative Recoveries               | Performance          | Numeric    | Cumulative recoveries – only relevant for cases with losses  | 9(11).99   | 14 | All                |
| <b>AR189</b> | Optional  | static  | Second Borrower's Employment Status | Borrower Information | List       | Employment status of the primary applicant: Employed or full loan is guaranteed (1)<br>Employed with partial support (company subsidy) (2) Protected life-time employment (Civil/government servant) (3) Unemployed (4)<br>Self-employed (5)<br>No employment, borrower is legal | List       | 2  | All                |

|           |           |        |  |                            |              |  |              |     |     |
|-----------|-----------|--------|--|----------------------------|--------------|--|--------------|-----|-----|
|           |           |        |  |                            |              | entity (6) Student (7)<br>Pensioner (8)<br>Other (9)<br>No Data (ND)   |              |     |     |
| AR237SECN | Mandatory | Static | Securitisation unique identifier         | Securitisation Information | Text/Numeric | The unique identifier assigned by the reporting entity in accordance with SECN 11.12. The reporting entity must not amend this unique identifier.<br><br>For example, for a Non-ABCP securitisation the unique identifier is composed of the following elements: [LEI of reporting entity+N+year of first issuance under the securitisation+[01, 02, 03, etc.]]. | Text/Numeric | 28  | All |
| AR238SECN | Mandatory | Static | Originator Name                          | Securitisation Information | Text/Numeric | Give the full legal name of the underlying exposure originator, involved in the securitisation. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   | Text/Numeric | 100 | All |
| AR239SECN | Mandatory | Static | Originator Legal Entity Identifier       | Securitisation Information | Text/Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the underlying exposure originator.   | Text/Numeric | 20  | All |
| AR240SECN | Mandatory | Static | Originator Establishment Country         | Securitisation Information | List         | Country where the underlying exposure originator is established.   | Text/Numeric | 50  | All |
| AR241SECN | Mandatory | Static | Original Lender Name                     | Securitisation Information | Text/Numeric | Give the full legal name of the original lender. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.  | Text/Numeric | 100 | All |
| AR242SECN | Mandatory | Static | Original Lender Legal Entity Identifier  | Securitisation Information | Text/Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the original lender.  | Text/Numeric | 20  | All |
| AR243SECN | Mandatory | Static | Original Lender Establishment Country    | Securitisation Information | List         | Country where the original lender is established.  | Text/Numeric | 50  | All |
| AR244SECN | Mandatory | Static | Credit Impaired Obligor (STS only)       | Securitisation Information | Y / N / ND   | Confirm that at the time that this underlying exposure was selected for transfer to the SSPE, the exposure met the criteria set out in SECN 2.2.12R(2) and SECN 2.2.12R(3) regarding exposures in default, exposures to a credit-impaired debtor or guarantor and exposures which have undergone a debt restructuring process.                                   | Y / N / ND   | 2   | All |
| AR245SECN | Mandatory | Static | Number Of Payments Before Securitisation | Securitisation Information | Numeric      | Enter the number of payments made prior to the exposure being transferred to the securitisation.   | 9(3)         | 12  | All |
| AR246SECN | Mandatory | Static | Primary Income Currency                  | Borrower Information       | List         | Currency in which the primary borrower's income is paid.   | List         | 2   | All |

SECN 11 Annex 3 and SECN 11 Annex 4 are deleted in their entirety. The deleted text is not shown but the annexes are marked [deleted] as shown below.

**11           Underlying exposures information—Commercial real estate  
Annex 3    (CRE) [deleted]**

**11           Underlying exposures information—Corporate [deleted]  
Annex 4**

Insert the following new annex, SECN 11 Annex 4A, after SECN 11 Annex 4. All the text is new and is not underlined.

**11           Underlying exposures information – Collateralised loan obligations  
Annex  
4A**

**11           R    [Editor's note: insert link to document containing 'Underlying exposures  
Annex  
4A           information - Collateralised loan obligations'.]**

## SECN 11 Annex 4A: Underlying exposures - Collateralised loan obligations

| Field number | Priority  | TAG     | Field Name                | Category            | Data Type        | Field Definition & Criteria   | Date type/format | Maximum Length |
|--------------|-----------|---------|---------------------------|---------------------|------------------|---|------------------|----------------|
| CLO1         | Mandatory | dynamic | <b>Pool Cut-off Date</b>  | Core                | Date             | Current pool or Portfolio cut-off date.   | DD-MM-YYYY       | 10             |
| CLO2         | Mandatory | static  | <b>Loan Identifier</b>    | Core                | Text/<br>Numeric | Unique identifier for each underlying exposure. Where applicable, industry standard unique identifiers such as loan identifiers or bond ISINs should be used.   | Text/<br>Numeric | 50             |
| CLO3         | Mandatory | Static  | <b>Pool Addition Date</b> | Core                | Date             | Date that the loan entered the pool   | DD-MM-YYYY       | 10             |
| CLO4         | Mandatory | static  | <b>Obligor Identifier</b> | Core                | Text/<br>Numeric | Unique identifier per obligor.  | Text/<br>Numeric | 50             |
| CLO5         | Mandatory | static  | <b>Obligor Name</b>       | Core                | Text/<br>Numeric | Obligor name  | Text/<br>Numeric | 50             |
| CLO6         | Mandatory | static  | <b>Country</b>            | Obligor Information | List             | Country of permanent establishment.   | Text/<br>Numeric | 50             |
| CLO7         | Mandatory | static  | <b>Industry Code</b>      | Obligor Information | Text/Numeric     | Obligor industry code   | Text/<br>Numeric | 50             |
| CLO8         | Mandatory | dynamic | <b>Revenue</b>            | Obligor Information | Numeric          | Annual sales volume net of all discounts and sales taxes of the obligor.  | 9(11).99         | 14             |
| CLO9         | Mandatory | dynamic | <b>Equity</b>             | Obligor Information | Numeric          | Amount of equity  | 9(11).99         | 14             |
| CLO10        | Mandatory | dynamic | <b>Total Debt</b>         | Obligor Information | Numeric          | Total gross debt of the obligor, including the financing provided in the present underlying exposure.   | 9(11).99         | 14             |
| CLO11        | Mandatory | dynamic | <b>EBITDA</b>             | Obligor Information | Numeric          | Recurring earnings from continuing operations plus interest, taxes, depreciation, and amortisation.   | 9(11).99         | 14             |
| CLO12        | Mandatory | dynamic | <b>Enterprise Value</b>   | Obligor Information | Numeric          | Enterprise value i.e. market capitalisation plus debt, minority interest and preferred shares, minus total cash and cash equivalents.   | 9(11).99         | 14             |
| CLO13        | Mandatory | dynamic | <b>Free Cashflow</b>      | Obligor Information | Numeric          | Net income plus non-cash charges plus interest x (1 - tax rate) plus long-term investments less investments in working capital. Non-cash charges include depreciation, amortisation, depletion, stock-based compensation and asset impairments. | 9(11).99         | 14             |
| CLO14        | Mandatory | dynamic | <b>Date Of Financials</b> | Obligor Information | Date             | The date of the financial information (e.g. EBITDA) on the obligor  | DD-MM-YYYY       | 10             |

|              |           |         |                                     |                      |               |  |               |      |
|--------------|-----------|---------|-------------------------------------|----------------------|---------------|--|---------------|------|
|              |           |         |                                     |                      |               | of this underlying exposure.   |               |      |
| <b>CLO15</b> | Mandatory | dynamic | <b>Financial Statement Currency</b> | Obligor Information  | List          | The reporting currency of the financial statements.  | Text/Numeric  | 50   |
| <b>CLO16</b> | Mandatory | static  | <b>Origination Date</b>             | Loan Characteristics | Date          | Date of the credit agreement relevant to this underlying exposure  | DD-MM-YYYY    | 10   |
| <b>CLO17</b> | Mandatory | static  | <b>Maturity Date</b>                | Loan Characteristics | Date          | The date of maturity of the underlying exposure.   | DD-MM-YYYY    | 10   |
| <b>CLO18</b> | Mandatory | static  | <b>Currency Denomination</b>        | Loan Characteristics | List          | The underlying exposure currency denomination.   | Text/Numeric  | 50   |
| <b>CLO19</b> | Mandatory | static  | <b>Original Principal Balance</b>   | Loan Characteristics | Numeric       | Original underlying exposure balance (inclusive of fees).<br>This is referring to the balance of the underlying exposure at the underlying exposure origination date, not the date of the underlying exposure's sale to the SSPE or the closing date of the securitisation.  | 9(11).99      | 14   |
| <b>CLO20</b> | Mandatory | dynamic | <b>Current Principal Balance</b>    | Loan Characteristics | Numeric       | Amount of underlying exposure outstanding as of the data cut-off date. This includes any amounts that are classed as principal in the securitisation. For example if fees have been added to the underlying exposure balance and are part of the principal in the securitisation these are to be added. Excluding any interest arrears or penalty amounts. | 9(11).99      | 14   |
| <b>CLO21</b> | Mandatory | static  | <b>Purpose</b>                      | Loan Characteristics | List          | Underlying exposure purpose: Mergers and Acquisitions Refinancing Recapitalisation General corporate purposes Other  | Text/ Numeric | 50   |
| <b>CLO22</b> | Mandatory | dynamic | <b>Seniority</b>                    | Loan Characteristics | List          | Debt Instrument Seniority: Senior Secured Senior Unsecured Subordinated Other  | List          | 20   |
| <b>CLO23</b> | Mandatory | Static  | <b>Loan security</b>                | Loan Characteristics | Text/ Numeric | Description of the loan security package.  | Text/ Numeric | 1000 |
| <b>CLO24</b> | Mandatory | Dynamic | <b>Recourse</b>                     | Loan Characteristics | Y / N / ND    | Is there recourse (full or limited) to the obligor's assets beyond the proceeds of any collateral for this underlying exposure?  | Y / N / ND    | 2    |

|              |           |         |                                    |                      |            |   |            |    |
|--------------|-----------|---------|------------------------------------|----------------------|------------|---|------------|----|
| <b>CLO25</b> | Mandatory | static  | <b>Syndicated</b>                  | Loan Characteristics | Y / N / ND | Is the underlying exposure a broadly syndicated loan?   | Y / N / ND | 2  |
| <b>CLO26</b> | Mandatory | dynamic | <b>Payment in Kind</b>             | Loan Characteristics | Y / N / ND | Is the underlying exposure currently paying in kind? (i.e. interest is paid in the form of capitalised principal)   | Y / N / ND | 2  |
| <b>CLO27</b> | Mandatory | dynamic | <b>Market Value</b>                | Loan Characteristics | Numeric    | Enter the market value of the underlying exposure, where applicable.  | 9(11).99   | 14 |
| <b>CLO28</b> | Mandatory | dynamic | <b>Total Credit Limit</b>          | Loan Characteristics | Numeric    | For underlying exposures with flexible re-draw facilities (including revolving characteristics) or where the maximum underlying exposure amount hasn't been withdrawn in full – the maximum underlying exposure amount that could potentially be outstanding. This field is only to be populated for underlying exposures that have flexible or further drawing characteristics.<br><br>This is not intended to capture instances where the obligor may renegotiate an increased underlying exposure balance but rather where there is currently the contractual ability for the obligor to do this and for the lender to provide the additional funding. | 9(11).99   | 14 |
| <b>CLO29</b> | Mandatory | static  | <b>Purchase Price</b>              | Loan Characteristics | Numeric    | Enter the price, relative to par, at which the underlying exposure was purchased by the SSPE.   | 9(11).99   | 14 |
| <b>CLO30</b> | Mandatory | static  | <b>Amortisation Type</b>           | Loan Characteristics | List       | Amortisation:<br>Linear (1)<br>French (2)<br>Fix Amortisation Schedule (3)<br>Bullet (4)<br>Partial Bullet (5)<br>Revolving (6)<br>Other (7)<br>No Data (ND)  | List       | 2  |
| <b>CLO31</b> | Mandatory | static  | <b>Principal Payment Frequency</b> | Loan Characteristics | List       | Frequency of principal payments due, i.e. number of months between payments.<br>Monthly (1)<br>Quarterly (2)<br>Semi annually (3)<br>Annual (4)<br>Bullet (5)<br>Other (6)<br>No data (ND)  | List       | 2  |

|       |           |         |                                    |                      |         |  |           |    |
|-------|-----------|---------|------------------------------------|----------------------|---------|--|-----------|----|
| CLO32 | Mandatory | static  | <b>Interest Payment Frequency</b>  | Loan Characteristics | List    | Frequency of interest payments due, i.e. number of months between payments.<br>Monthly (1)<br>Quarterly (2)<br>Semi annually (3)<br>Annual (4)<br>Bullet (5)<br>Other (6)<br>No data (ND)  | List      | 2  |
| CLO33 | Mandatory | dynamic | <b>Payment Due</b>                 | Loan Characteristics | Numeric | This is the next contractual payment due by the obligor according to the payment frequency of the underlying exposure.   | 9(11).99  | 14 |
| CLO34 | Mandatory | dynamic | <b>Balloon Amount</b>              | Loan Characteristics | Numeric | Total amount of principal repayment to be paid at the maturity date of the underlying exposure.  | 9(11).99  | 14 |
| CLO35 | Mandatory | dynamic | <b>Interest Rate Type</b>          | Loan Characteristics | List    | Interest rate type:<br>Floating rate underlying exposure (for life) (FLIF)<br>Floating rate underlying exposure linked to one index that will revert to another index in the future (FINX)<br>Fixed rate underlying exposure (for life) (FXRL) Fixed with future periodic resets (FXPR)<br>Fixed rate underlying exposure with compulsory future switch to floating (FLCF)<br>Floating rate underlying exposure with floor (FLFL) Floating rate underlying exposure with cap (CAPP)<br>Floating rate underlying exposure with both floor and cap (FLCA) Discount (DISC)<br>Switch Optionality (SWIC) Obligor Swapped (OBLS) Modular (MODE)<br>Other (OTHR) | List      | 4  |
| CLO36 | Mandatory | dynamic | <b>Current Interest Rate</b>       | Loan Characteristics | Numeric | Gross rate per annum used to calculate the current period scheduled interest on the underlying exposure. Rates calculated on a period-by-period basis must be annualised.  | 9(4).9(8) | 13 |
| CLO37 | Mandatory | dynamic | <b>Current Interest Rate Index</b> | Loan Characteristics | List    | The base reference interest index currently applicable (the reference rate off which the interest rate is set):<br>Euribor (EUR) SONIA (SONI) SOFR (SOFR)<br>BBSW (BBSW) CDOR (CDOR)<br>Other (OTHR)   | List      | 4  |

|              |           |         |  |                      |                  |  |                  |     |
|--------------|-----------|---------|--|----------------------|------------------|--|------------------|-----|
| <b>CLO38</b> | Mandatory | dynamic | <b>Current Interest Rate Index Tenor</b>                   | Loan Characteristics | List             | Tenor of the current interest rate index:<br>Overnight (OVNG)<br>1 month (MNTH)<br>3 month (QUTR)<br>6 month (SEMI)<br>12 month (YEAR) Other (OTHR)  | List             | 4   |
| <b>CLO39</b> | Mandatory | dynamic | <b>Current Interest Rate Margin</b>                        | Loan Characteristics | Numeric          | Current interest rate margin of the floating-rate underlying exposure over (or under, in which case input as a negative) the index rate.   | 9(4).9(8)        | 13  |
| <b>CLO40</b> | Mandatory | dynamic | <b>Interest Rate Reset Interval</b>                        | Loan Characteristics | Numeric          | Number of months between each interest rate reset date on the underlying exposure.   | 9(4)             | 5   |
| <b>CLO41</b> | Mandatory | dynamic | <b>Interest Rate Cap</b>                                   | Hedging information  | Numeric          | Maximum rate that the obligor must pay on a floating rate underlying exposure as required under the terms of the underlying exposure agreement.  | 9(4).9(8)        | 13  |
| <b>CLO42</b> | Mandatory | dynamic | <b>Interest Rate Floor</b>                                 | Hedging information  | Numeric          | Minimum rate that the obligor must pay on a floating rate underlying exposure as required under the terms of the underlying exposure agreement.  | 9(4).9(8)        | 13  |
| <b>CLO43</b> | Mandatory | dynamic | <b>Interest Rate Swap Notional</b>                         | Hedging information  | Numeric          | If there is an interest rate swap on the underlying exposure, enter the notional amount.   | 9(11).99         | 14  |
| <b>CLO44</b> | Mandatory | dynamic | <b>Interest Rate Swap Provider Legal Entity Identifier</b> | Hedging information  | Text/<br>Numeric | Provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the underlying exposure interest rate swap provider.  | Text/Numeric     | 20  |
| <b>CLO45</b> | Mandatory | dynamic | <b>Interest Rate Swap Provider</b>                         | Hedging information  | Text/<br>Numeric | If there is an interest rate swap on the underlying exposure, provide the full legal name of the interest rate swap provider. The name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database. | Text/<br>Numeric | 100 |
| <b>CLO46</b> | Mandatory | dynamic | <b>Interest Rate Swap Maturity Date</b>                    | Hedging information  | Date             | If there is an interest rate swap on the underlying exposure, enter the maturity date of the swap.   | DD-MM-YYYY / ND  | 10  |
| <b>CLO47</b> | Mandatory | dynamic | <b>Currency Swap Notional</b>                              | Hedging information  | Numeric          | If there is an exchange rate swap on the underlying exposure, enter the notional amount.   | 9(11).99         | 14  |
| <b>CLO48</b> | Mandatory | dynamic | <b>Currency Swap Provider Legal Entity Identifier</b>      | Hedging information  | Text/<br>Numeric | If there is an exchange rate swap on the underlying exposure, provide the Legal Entity Identifier (as specified in the Global  | Text/<br>Numeric | 20  |

|              |           |         |                                    |                         |               |  |                 |     |
|--------------|-----------|---------|------------------------------------|-------------------------|---------------|--|-----------------|-----|
|              |           |         |                                    |                         |               | Legal Entity Foundation (GLEIF) database) of the swap provider.  |                 |     |
| <b>CLO49</b> | Mandatory | dynamic | <b>Currency Swap Provider</b>      | Hedging information     | Text/ Numeric | If there is an exchange rate swap on the underlying exposure, provide the full legal name of the exchange rate swap provider. The name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   | Text/ Numeric   | 100 |
| <b>CLO50</b> | Mandatory | dynamic | <b>Currency Swap Maturity Date</b> | Hedging information     | Date          | If there is an exchange rate swap on the underlying exposure, enter the maturity date of the swap.   | DD-MM-YYYY / ND | 10  |
| <b>CLO51</b> | Mandatory | dynamic | <b>Date Last In Arrears</b>        | Performance information | Date / ND     | Date the obligor was last in arrears.  | DD-MM-YYYY / ND | 10  |
| <b>CLO52</b> | Mandatory | dynamic | <b>Arrears Balance</b>             | Performance information | Numeric       | Current balance of arrears, which is defined as: Total payments due to date PLUS any amounts capitalised PLUS any fees applied to the account LESS total payments received to date. If no arrears then enter 0.  | 9(11).99        | 14  |
| <b>CLO53</b> | Mandatory | dynamic | <b>Number of Days in Arrears</b>   | Performance information | Numeric       | Number of days this underlying exposure is in arrears (either interest or principal and, if different, the higher number of the two) as at the data cut-off date.  | 9(4)            | 5   |
| <b>CLO54</b> | Mandatory | dynamic | <b>Account Status</b>              | Performance information | List          | Current status of the underlying exposure that has been securitised:<br>Performing (PERF)<br>Restructured - No Arrears (RNAR)<br>Restructured - Arrears (RARR)<br>Defaulted according to Basel III Definition of default (DFLT)<br>Not defaulted according to Basel III Definition of default but classified as defaulted due to another definition of default being met (NDFT)<br>Defaulted both according to Basel III Definition of default and according to another definition of default being met (DTCR)<br>Defaulted only under another definition of default being met (DADB)<br>Arrears (ARRE)<br>Repurchased by Seller – Breach of Representations and Warranties (REBR)<br>Repurchased by Seller – Defaulted (REDF)<br>Repurchased by Seller – Restructured (RERE)<br>Repurchased by Seller – Special | List            | 4   |

|              |           |         |  |                         |           |  |                 |    |
|--------------|-----------|---------|--|-------------------------|-----------|--|-----------------|----|
|              |           |         |  |                         |           | Servicing (RESS) Repurchased by Seller – Other Reason (REOT) Redeemed (RDMD) Other (OTHR)<br><br>Restructuring refers to any changes made to the contractual terms of the underlying exposure agreement due to forbearance, including arrears capitalisation, change of interest rate basis or margins, fees, penalties, maturity, and/or other generally-accepted measures of restructuring due to forbearance. |                 |    |
| <b>CLO55</b> | Mandatory | dynamic | <b>Reason for Default or Foreclosure</b> | Performance information | List      | Using Basel III Definition Reason for default. Bankruptcy / Insolvency (1) Failure to Pay (2) Breach of Terms (3) Other (4) No data (ND)   | List            | 2  |
| <b>CLO56</b> | Mandatory | dynamic | <b>Default Amount</b>                    | Performance information | Numeric   | Total gross default amount before the application of sale proceeds and recoveries. If not in default, enter 0.   | 9(11).99        | 14 |
| <b>CLO57</b> | Mandatory | dynamic | <b>Default Date</b>                      | Performance information | Date / ND | The date of default.   | DD-MM-YYYY / ND | 10 |
| <b>CLO58</b> | Mandatory | dynamic | <b>Allocated Losses</b>                  | Performance information | Numeric   | The allocated losses to date, net of fees, accrued interest etc. after application of sale proceeds. Show any gain on sale as a negative number. Should reflect most recent situation as at the data cut-off date, i.e. as recoveries are collected and the work out process progresses.   | 9(11).99        | 14 |
| <b>CLO59</b> | Mandatory | dynamic | <b>Cumulative Recoveries</b>             | Performance information | Numeric   | Total recoveries (regardless of their source) on the (defaulted/charged-off/etc.) debt, net of costs. Include all sources of recoveries here, not just proceeds from the disposal of any collateral.   | 9(11).99        | 14 |
| <b>CLO60</b> | Mandatory | Dynamic | <b>Date Of Restructuring</b>             | Performance information | Date / ND | Enter the date at which the underlying exposure has been restructured. Restructuring refers to any changes made to the contractual terms of the underlying exposure agreement due to forbearance, including arrears capitalisation, change of interest rate basis or margins, fees, penalties, maturity and/or other generally-  | DD-MM-YYYY / ND | 10 |

|              |           |         |  |                            |                  |   |                  |     |
|--------------|-----------|---------|--|----------------------------|------------------|---|------------------|-----|
|              |           |         |  |                            |                  | accepted measures of restructuring due to forbearance.  |                  |     |
| <b>CLO61</b> | Mandatory | Dynamic | <b>Recovery Source</b>                         | Performance information    | List             | The source of the recoveries: Liquidation of Collateral (LCOL) Enforcement of Guarantees (EGAR) Additional Lending (ALEN) Cash Recoveries (CASR) Mixed (MIXD) Other (OTHR) No data (ND)   | List             | 4   |
| <b>CLO62</b> | Mandatory | Static  | <b>Securitisation unique identifier</b>        | Securitisation Information | Text/<br>Numeric | The unique identifier assigned by the reporting entity in accordance with SECN 11.12. The reporting entity must not amend this unique identifier. For example, for a Non-ABCP securitisation the unique identifier is composed of the following elements: [LEI of reporting entity+N+year of first issuance under the securitisation+[01, 02, 03, etc.]]. | Text/<br>Numeric | 28  |
| <b>CLO63</b> | Mandatory | Static  | <b>Originator Name</b>                         | Securitisation Information | Text/<br>Numeric | Give the full legal name of the underlying exposure originator, involved in the securitisation. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.  | Text/<br>Numeric | 100 |
| <b>CLO64</b> | Mandatory | Static  | <b>Originator Legal Entity Identifier</b>      | Securitisation Information | Text/<br>Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the underlying exposure originator.  | Text/<br>Numeric | 20  |
| <b>CLO65</b> | Mandatory | Static  | <b>Originator Establishment Country</b>        | Securitisation Information | List             | Country where the underlying exposure originator is established.  | Text/<br>Numeric | 50  |
| <b>CLO66</b> | Mandatory | Static  | <b>Original Lender Name</b>                    | Securitisation Information | Text/<br>Numeric | Where the loan has been originated through direct lending (rather than as a broadly syndicated loan), give the full legal name of the original lender. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   | Text/<br>Numeric | 100 |
| <b>CLO67</b> | Mandatory | Static  | <b>Original Lender Legal Entity Identifier</b> | Securitisation Information | Text/<br>Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the original lender.   | Text/<br>Numeric | 20  |

|              |           |        |   |                            |         |  |                  |    |
|--------------|-----------|--------|---|----------------------------|---------|--|------------------|----|
| <b>CLO68</b> | Mandatory | Static | <b>Original Lender Establishment Country</b>    | Securitisation Information | List    | Where applicable, country where the original lender is established.                              | Text/<br>Numeric | 50 |
| <b>CLO69</b> | Mandatory | Static | <b>Number Of Payments Before Securitisation</b> | Securitisation Information | Numeric | Enter the number of payments made prior to the exposure being transferred to the securitisation. | 9(4)             | 5  |

SECN 11 Annex 5 and SECN 11 Annex 6 are deleted in their entirety and replaced with the following. The text is not underlined.

[*Editor's note*: the forms that currently form part of SECN 11 Annex 5 and SECN 11 Annex 6 are to be marked as 'superseded'.]

**11           Underlying exposures information – Automobile**  
**Annex 5**

11 Annex   R    [*Editor's note*: insert link to document containing 'Underlying exposures information - Automobile'.]

## SECN 11 Annex 5: Underlying exposures - automobile

| Field number | Priority  | TAG     | Field Name                   | Category               | Data Type     | Field Definition & Criteria   | Date type/format | Maximum Length | Jurisdictions | Individuals / Corporates |
|--------------|-----------|---------|------------------------------|------------------------|---------------|---|------------------|----------------|---------------|--------------------------|
| AA1          | Mandatory | dynamic | Pool Cut-off Date            | Core                   | Date          | Pool or Portfolio cut-off date.   | DD-MM-YYYY       | 10             | All           |                          |
| AA5          | Optional  | dynamic | Servicer Identifier          | Core                   | Text/ Numeric | Unique identifier per servicer to flag which entity is servicing the loan   | Text/Numeric     | 50             | All           |                          |
| AA6          | Optional  | dynamic | Servicer Rating              | Core                   | Text/ Numeric | Rating of the Servicer from the Rating Agency which rated the deal. If that particular Rating Agency did not also rate the deal, then use an alternative rating if available. If no ratings available, enter ND for no data.  | Text/Numeric     | 10             | All           |                          |
| AA7          | Mandatory | Static  | Loan Currency Denomination   | Core                   | List          | The loan currency denomination.   | List             | 2              | All           |                          |
| AA15         | Mandatory | Static  | Loan Identifier              | Core                   | Text/ Numeric | Unique identifier for the loan. The loan ID should not change through the life of the transaction. If the original loan ID cannot be maintained in this field, enter the original ID followed by the new ID, comma delimited.   | Text/Numeric     | 50             | All           |                          |
| AA16         | Mandatory | Static  | Corporate Identifier         | Core                   | Text/ Numeric | Unique identifier for the corporate sponsor of the loan. If the borrower is an individual enter ND for no data.   | Text/Numeric     | 50             | All           | Corporate                |
| AA20         | Mandatory | Static  | Customer Type                | Loan level information | List          | Type of Customer: Individual (1)<br>Corporate (2)<br>Other (3)  | List             | 1              | All           |                          |
| AA22         | Mandatory | Static  | Borrower's Employment Status | Loan level information | List          | Employment status of the primary applicant:<br>Employed or full loan is guaranteed (1)<br>Employed with partial support (company subsidy) (2)<br>Protected life-time employment (Civil/government servant) (3)<br>Unemployed (4)<br>Self-employed (5)<br>No employment, borrower is legal entity (6)<br>Student (7)<br>Pensioner (8)<br>Other (9)<br>No Data (ND) | List             | 2              | All           | Individuals              |

|      |           |         |  |                        |         |  |            |    |     |             |
|------|-----------|---------|--|------------------------|---------|--|------------|----|-----|-------------|
| AA23 | Mandatory | Static  | Primary Income                               | Loan level information | Numeric | Primary borrower underwritten annual income. If income not part of the underwriting decision or the borrower is a corporate, enter ND.   | 9(11).99   | 50 | All | Individuals |
| AA24 | Mandatory | Static  | Primary Income Currency                      | Loan level information | List    | The income currency denomination.  | List       | 2  | All | Individuals |
| AA25 | Mandatory | Static  | Income Verification for Primary Income       | Loan level information | List    | Income verification for primary income: Self-certified no checks (1)<br>Self-certified with affordability confirmation (2)<br>Verified (3)<br>Non-Verified Income / Fast Track (4) Other (5)<br>No Data (ND) | List       | 2  | All | Individuals |
| AA26 | Mandatory | dynamic | Revenue                                      | Loan level information | Numeric | Revenue of the corporate customer, per the most recent audited financial statements. If data is not available enter ND for no data.  | 9(11).99   | 14 | All | Corporate   |
| AA27 | Optional  | dynamic | EBITDA                                       | Loan level information | Numeric | Earnings Before Interest, Tax, Depreciation and Amortisation of the corporate customer, per the most recent audited financial statements. If data is not available enter ND for no data.                     | 9(11).99   | 14 | All | Corporate   |
| AA28 | Optional  | dynamic | Date of the most recent Financial Statements | Loan level information | Date    | Date of the most recent audited financial statements. If data is not available enter ND for no data.   | DD-MM-YYYY | 10 | All | Corporate   |
| AA29 | Mandatory | dynamic | Financial Statement Currency                 | Loan level information | List    | The reporting currency of the financial statements. If data is not available enter ND for no data.   | List       | 2  | All | Corporate   |
| AA30 | Mandatory | dynamic | Geographic Region                            | Loan level information | List    | The region where the borrower is located. ITL 1 region coding to be used. See ONS Open Geography Portal for relevant choices.  | List       | 3  | All |             |
| AA31 | Mandatory | Static  | Origination Date                             | Loan level information | Date    | Date of original loan or lease advance.  | DD-MM-YYYY | 10 | All |             |
| AA32 | Mandatory | dynamic | Date of Loan Maturity                        | Loan level information | Date    | Date of loan maturity or expiry of lease.  | DD-MM-YYYY | 10 | All |             |
| AA33 | Mandatory | Static  | Loan Term                                    | Loan level information | Numeric | Original contractual term (number of months).  | 9(11).99   | 14 | All |             |
| AA34 | Mandatory | Static  | Original Principal Balance                   | Loan level information | Numeric | Borrower's original loan balance (inclusive of fees).  | 9(11).99   | 14 | All |             |
| AA35 | Mandatory | dynamic | Current Principal                            | Loan level information | Numeric | Borrower's loan outstanding as of the pool cut off date. This should include any amounts that are secured against the vehicle. For example if fees have been added to the loan balance and are part          | 9(11).99   | 14 | All |             |

|      |           |         |                             |                        |         |   |          |    |     |  |
|------|-----------|---------|-----------------------------|------------------------|---------|---|----------|----|-----|--|
|      |           |         | Outstanding Balance         |                        |         | of the principal in the transaction these should be added. Excluding any interest arrears or penalty amounts.   |          |    |     |  |
| AA36 | Mandatory | dynamic | Scheduled Payment Due       | Loan level information | Numeric | The next contractual scheduled payment due (the payment due if there are no other payment arrangements in force).   | 9(11).99 | 14 | All |  |
| AA37 | Mandatory | dynamic | Scheduled Payment Frequency | Loan level information | List    | Scheduled Payment Frequency: Weekly (1)<br>Fortnightly (2)<br>Monthly (3)<br>Quarterly (4)<br>Semi Annually (5)<br>Annually (6)<br>Other (7)<br>No Data (ND)                        | List     | 2  | All |  |
| AA38 | Mandatory | Static  | Downpayment Amount          | Loan level information | Numeric | Amount of deposit/downpayment on origination of loan (this should include the value of traded-in vehicles etc.)   | 9(11).99 | 14 | All |  |
| AA39 | Mandatory | Static  | Original Loan to Value      | Loan level information | Numeric | The LTV of the vehicle at origination. Rounded to the nearest 5 percent.  | 9(11).99 | 14 | All |  |
| AA40 | Mandatory | dynamic | Product Type                | Loan level information | List    | Product Type:<br>Hire Purchase (1)<br>Balloon (2)<br>Loan (3)<br>Personal Contract Purchase (4)<br>Other (5)<br>No Data (ND)  | List     | 2  | All |  |
| AA41 | Mandatory | Static  | Balloon Payment Amount      | Loan level information | Numeric | The balloon payment amount  | 9(11).99 | 14 | All |  |
| AA42 | Mandatory | dynamic | Interest Rate Type          | Loan level information | List    | Interest Rate Type: Fixed Rate (1)<br>Floating Rate (2)<br>Other (3)  | List     | 1  | All |  |
| AA43 | Optional  | dynamic | Annual Percentage Rate      | Loan level information | Numeric | Annual Percentage Rate (APR). The yearly cost of the loan, including interest, insurance and the origination fee, expressed as a percentage. Rounded to the nearest half a percent. | 9(11).99 | 14 | All |  |
| AA44 | Mandatory | dynamic | Current Interest Rate       | Loan level information | Numeric | Current interest rate (%) of the loan. Rounded to the nearest half a percent.   | 9(11).99 | 14 | All |  |
| AA45 | Mandatory | Static  | Car Manufacturer            | Loan level information | Text    | Name of the vehicle manufacturer  | Text     | 50 | All |  |

|      |           |         |                            |                        |         |   |            |     |     |  |
|------|-----------|---------|----------------------------|------------------------|---------|---|------------|-----|-----|--|
| AA46 | Optional  | Static  | Car Model                  | Loan level information | Text    | Name of the car model   | Text       | 50  | All |  |
| AA47 | Optional  | Static  | Engine Size                | Loan level information | Numeric | Engine size in Litres   | 9(11).99   | 14  | All |  |
| AA48 | Optional  | Static  | Year of Registration       | Loan level information | Date    | Year the car was registered   | DD-MM-YYYY | 10  | All |  |
| AA49 | Mandatory | Static  | New or Used Car            | Loan level information | List    | Condition it went into the pool:<br>New (New cars are those with zero or delivery mileage) (1) Used (Cars with a prior owner) (2) Demo (3) Other (4) No Data (ND)   | List       | 4-2 | All |  |
| AA50 | Mandatory | Static  | Original List Price of Car | Loan level information | Numeric | List price of the vehicle at origination. For a used car, enter the trade value or the sale price of the used car.  | 9(11).99   | 14  | All |  |
| AA51 | Mandatory | dynamic | Residual Value             | Loan level information | Numeric | Residual value at end of contract, as at pool cut off date. If data not available enter ND for no data.   | 9(11).99   | 14  | All |  |
| AA52 | Mandatory | Static  | Origination Channel        | Loan level information | List    | Origination channel: Dealer (1) Broker (2) Direct (3) Indirect (4) Other (5) No Data (ND)   | List       | 2   | All |  |
| AA53 | Mandatory | dynamic | Account Status             | Loan level information | List    | Current status of account: Performing (1) Arrears (2) Default or Foreclosure (3) Redeemed (4) In advance (5) Repurchased by Seller (6) Other (7) No Data (ND)   | List       | 2   | All |  |
| AA54 | Mandatory | dynamic | Payments in Arrears        | Loan level information | Numeric | Number of scheduled payments in Arrears. (Enter 0 for loans not in arrears)   | 9(11).99   | 14  | All |  |
| AA55 | Mandatory | dynamic | Arrears Balance            | Loan level information | Numeric | Current balance of arrears. Arrears defined as:<br>Total payments due to date<br>LESS Total payments received to date LESS any amounts capitalised.<br>This should not include any fees applied to the account. | 9(11).99   | 14  | All |  |

|      |           |         |                        |                         |            |  |            |    |         |  |
|------|-----------|---------|------------------------|-------------------------|------------|--|------------|----|---------|--|
| AA56 | Mandatory | dynamic | Payment method         | Loan level information  | List       | Payment method used Direct Debit (1)<br>Cash (2)<br>Monthly bank transfer (not direct debit) (3) Cheque (4)<br>Other (5)<br>No Data (ND)   | List       | 2  | All     |  |
| AA65 | Mandatory | Static  | Date of Default        | Performance information | Date       | The date of default or foreclosure.  | DD-MM-YYYY | 10 | All     |  |
| AA66 | Mandatory | Static  | Sale Price             | Performance information | Numeric    | Price achieved on sale of vehicle in case of foreclosure. If no data available enter ND for no data.   | 9(11).99   | 14 | All     |  |
| AA67 | Mandatory | Static  | Loss on Sale           | Performance information | Numeric    | Total loss net of fees, accrued interest etc. after application of sale proceeds (excluding prepayment charge if subordinate to principal recoveries). Show any gain on sale as a negative number. | 9(11).99   | 14 | All     |  |
| AA68 | Mandatory | dynamic | Cumulative Recoveries  | Performance information | Numeric    | Cumulative recoveries – only relevant for cases with losses.<br>(If not in default/foreclosure enter ND for no data).  | 9(11).99   | 14 | All     |  |
| AA69 | Mandatory | dynamic | Gross Default Amount   | Performance information | Numeric    | Gross Default Amount. (If not in default/foreclosure enter ND for no data).  | 9(11).99   | 14 | All     |  |
| AA70 | Optional  | dynamic | Net Losses             | Performance information | Numeric    | Cumulative Net Losses. (If not in default/foreclosure enter ND for no data).   | 9(11).99   | 14 | All     |  |
| AA71 | Optional  | dynamic | Gross Losses           | Performance information | Numeric    | Cumulative Gross Losses. (If not in default/foreclosure enter ND for no data).   | 9(11).99   | 14 | All     |  |
| AA72 | Mandatory | dynamic | Residual Value Losses  | Performance information | Numeric    | Cumulative Residual Value Losses. (If not in default/foreclosure enter ND for no data).  | 9(11).99   | 14 | All     |  |
| AA92 | Optional  | dynamic | Voluntary Termination? | Termination Information | Y / N / ND | Was the auto loan terminated voluntarily?  | Y / N / ND | 12 | UK only |  |
| AA93 | Optional  | dynamic | VT Date                | Termination Information | Date       | Voluntary Termination Date   | DD-MM-YYYY | 12 | UK only |  |
| AA94 | Optional  | dynamic | VT Amount              | Termination Information | Numeric    | Outstanding Balance as of Termination Date   | 9(11).99   | 14 | UK only |  |
| AA95 | Optional  |         | VT Sale Date           | Termination Information | Date       | Date of sale of asset returned in case of voluntary termination of contract.   | DD-MM-YYYY | 12 | UK only |  |
| AA96 | Optional  | dynamic | VT Sale Price          | Termination Information | Numeric    | Price achieved on sale of asset in case of voluntary termination of contract.  | 9(11).99   | 14 | UK only |  |
| AA97 | Optional  | dynamic | VT Loss on Sale        | Termination Information | Numeric    | Total loss net of fees, accrued interest etc. after application of sale proceeds in case of voluntary termination of contract.   | 9(11).99   | 14 | UK only |  |

|           |           |        |   |                            |               |  |              |     |     |  |
|-----------|-----------|--------|---|----------------------------|---------------|--|--------------|-----|-----|--|
| AA98      | Mandatory | Static | Pool Addition Date                      | Core                       | Date          | <u>Date that the loan or lease entered the pool</u>  | DD-MM-YYYY   | 10  | All |  |
| AA109SECN | Mandatory | Static | Securitisation unique identifier        | Securitisation Information | Text/ Numeric | The unique identifier assigned by the reporting entity in accordance with SECN 11.12. The reporting entity must not amend this unique identifier.<br>For example, for a Non-ABCP securitisation the unique identifier is composed of the following elements: [LEI of reporting entity+N+year of first issuance under the securitisation+[01, 02, 03, etc.]]. | Text/Numeric | 28  | All |  |
| AA110SECN | Mandatory | Static | Originator Name                         | Securitisation Information | Text/ Numeric | Give the full legal name of the underlying exposure originator, involved in the securitisation. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   | Text/Numeric | 100 | All |  |
| AA111SECN | Mandatory | Static | Originator Legal Entity Identifier      | Securitisation Information | Text/ Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the underlying exposure originator.   | Text/Numeric | 20  | All |  |
| AA112SECN | Mandatory | Static | Originator Establishment Country        | Securitisation Information | List          | Country where the underlying exposure originator is established.   | Text/Numeric | 50  | All |  |
| AA113SECN | Mandatory | Static | Original Lender Name                    | Securitisation Information | Text/ Numeric | Give the full legal name of the original lender. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.  | Text/Numeric | 100 | All |  |
| AA114SECN | Mandatory | Static | Original Lender Legal Entity Identifier | Securitisation Information | Text/ Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the original lender.  | Text/Numeric | 20  | All |  |
| AA115SECN | Mandatory | Static | Original Lender Establishment Country   | Securitisation Information | List          | Country where the original lender is established.  | Text/Numeric | 50  | All |  |
| AA116SECN | Mandatory | Static | Credit Impaired Obligor (STS only)      | Securitisation Information | Y / N / ND    | Confirm that at the time that this underlying exposure was selected for transfer to the SSPE, the exposure met the criteria set out in SECN 2.2.12R(2) and SECN 2.2.12R(3) regarding exposures in default, exposures to a credit-impaired debtor or guarantor and exposures which have undergone a debt restructuring process.                               | Y / N / ND   | 2   | All |  |
| AA117SECN | Mandatory | Static | Number Of Payments                      | Securitisation Information | Numeric       | Enter the number of payments made prior to the exposure  | 9(3)         | 12  | All |  |

|           |           |         |                              |                            |           |   |                 |    |     |  |
|-----------|-----------|---------|------------------------------|----------------------------|-----------|---|-----------------|----|-----|--|
|           |           |         | Before Securitisation        |                            |           | being transferred to the securitisation.  |                 |    |     |  |
| AA118SECN | Optional  | Static  | Fuel Type                    | Loan level information     | List      | Vehicle fuel type: Petrol (1)<br>Diesel (2)<br>Hybrid Electric (3)<br>Battery Electric (4)<br>Other (5)<br>No Data (ND)   | List            | 2  | All |  |
| AA119SECN | Mandatory | Dynamic | Date Of Restructuring        | Performance information    | Date / ND | Enter the date at which the underlying exposure has been restructured. Restructuring refers to any changes made to the contractual terms of the underlying exposure agreement due to forbearance, including payment holidays, arrears capitalisation, change of interest rate basis or margins, fees, penalties, maturity and/or other generally-accepted measures of restructuring due to forbearance. | DD-MM-YYYY / ND | 10 | All |  |
| AA120SECN | Mandatory | Dynamic | Date Last In Arrears         | Performance information    | Date / ND | Date the obligor was last in arrears.   | DD-MM-YYYY / ND | 10 | All |  |
| AA121SECN | Mandatory | Dynamic | Cumulative Pre-payments      | Performance information    | Numeric   | Total prepayments collected as at the data cut-off date (prepayments defined as unscheduled principal payment) since the underlying exposure origination date   | 9(11).99        | 14 | All |  |
| AA122SECN | Mandatory | Static  | Original Residual Value      | Loan level information     | Numeric   | The residual value of the asset at the date of lease origination.   | 9(11).99        | 14 | All |  |
| AA123SECN | Mandatory | Static  | Securitised Residual Value   | Securitisation Information | Numeric   | Residual value amount which has been securitised only.  | 9(11).99        | 14 | All |  |
| AA124SECN | Mandatory | Dynamic | Current Interest Rate Margin | Loan level information     | Numeric   | Where applicable, the current interest rate margin of the floating-rate underlying exposure over (or under, in which case input as a negative) the index rate.  | 9(4).9(8)       | 13 | All |  |

**11           Underlying exposures information – Consumer**  
**Annex 6**

11           R    [*Editor's note:* insert link to document containing 'Underlying  
Annex 6           exposures information - Consumer'.]

## SECN 11 Annex 6: Underlying exposures - consumer

| Field number | Priority  | TAG     | Field Name                                    | Category               | Data Type    | Field Definition & Criteria  | Date type/format | Maximum Length | Jurisdictions |
|--------------|-----------|---------|---|------------------------|--------------|--|------------------|----------------|---------------|
| AN1          | Mandatory | dynamic | <b>Pool Cut-off Date</b>                      | Core                   | Date         | Pool or Portfolio cut-off date.  | DD-MM-YYYY       | 10             | All           |
| AN4          | Optional  | Static  | <b>Servicer Identifier</b>                    | Core                   | Text/Numeric | Unique identifier per servicer to flag which entity is servicing the loan  | Text/Numeric     | 50             | All           |
| AN5          | Mandatory | Static  | <b>Loan Currency Denomination</b>             | Core                   | List         | The loan currency denomination.  | List             | 2              | All           |
| AN16         | Mandatory | Static  | <b>Pool Addition Date</b>                     | Core                   | Date         | Date that the loan entered the pool  | DD-MM-YYYY       | 10             | All           |
| AN17         | Mandatory | Static  | <b>Loan Identifier</b>                        | Core                   | Text/Numeric | Unique identifier for a particular loan in the pool  | Text/Numeric     | 50             | All           |
| AN18         | Mandatory | Static  | <b>Borrower Identifier</b>                    | Core                   | Text/Numeric | Unique identifier for a particular borrower. Should be encrypted to ensure data protection.  | Text/Numeric     | 50             | All           |
| AN22         | Mandatory | Static  | <b>Borrower's Employment Status</b>           | Loan Level Information | List         | Employment status of the primary applicant:<br>Employed (1)<br>Full loan is guaranteed (2)<br>Employed with partial support (company subsidy) (3)<br>Protected life-time employment (Civil/government servant) (4)<br>Unemployed (5)<br>Self-employed (6)<br>No employment, borrower is legal entity (7)<br>Student (8)<br>Pensioner (9)<br>Other (10)<br>No Data (ND) | List             | 2              | All           |
| AN23         | Mandatory | Static  | <b>Primary Income</b>                         | Loan Level Information | Numeric      | Primary borrower underwritten gross annual income (not rent).  | 9(11).99         | 14             | All           |
| AN24         | Mandatory | Static  | <b>Primary Income Currency</b>                | Loan Level Information | List         | Primary income currency denomination.  | List             | 2              | All           |
| AN25         | Mandatory | Static  | <b>Income Verification for Primary Income</b> | Loan Level Information | List         | Income verification for primary income: Self-certified no checks (1)<br>Self-certified with affordability confirmation (2)<br>Verified (3)<br>Partially Verified (4)<br>Non-Verified Income / Fast Track (5)<br>Other (6)<br>No Data (ND)  | List             | 2              | All           |
| AN26         | Mandatory | dynamic | <b>Geographic Region</b>                      | Loan Level Information | Text/Numeric | The region where the borrower is located. ITL 1 classification to be   | List             | 3              | All           |

|      |           |         |  |                        |         |   |            |    |     |
|------|-----------|---------|--|------------------------|---------|---|------------|----|-----|
|      |           |         |  |                        |         | used. See ONS Open Geography Portal for relevant choices.   |            |    |     |
| AN27 | Mandatory | Static  | <b>Origination Date</b>  | Loan Level Information | Date    | Date of original loan advance.  | DD-MM-YYYY | 10 | All |
| AN28 | Mandatory | dynamic | <b>Date of Loan Maturity</b>   | Loan Level Information | Date    | Date of loan maturity.  | DD-MM-YYYY | 10 | All |
| AN29 | Mandatory | Static  | <b>Original Loan Term</b>  | Loan Level Information | Numeric | Original contractual term (number of months).   | Numeric    | 2  | All |
| AN31 | Mandatory | Static  | <b>Original Principal Balance</b>  | Loan Level Information | Numeric | Original loan balance (inclusive of fees).  | 9(11).99   | 14 | All |
| AN32 | Mandatory | dynamic | <b>Current Principal Outstanding Balance</b>                                 | Loan Level Information | Numeric | Amount of loan outstanding as of pool cut off date. This should include any amounts that are secured against the loan. For example if fees have been added to the loan balance and are part of the principal in the transaction these should be added. Excluding any interest arrears or penalty amounts. | 9(11).99   | 14 | All |
| AN33 | Mandatory | dynamic | <b>Current Outstanding Balance inc. Principal, Accrued Interest and Fees</b> | Loan Level Information | Numeric | Amount of loan outstanding as of pool cut off date, this should include any accrued interest and penalty fees payable   | 9(11).99   | 14 | All |
| AN34 | Mandatory | dynamic | <b>Repayment Method</b>  | Loan Level Information | List    | Type of principal repayment: Interest Only (1) Constant Instalment Repayment (2) Straight-Line Repayment (3) Mixture of Interest Only & Repayment (4) Other (5) No Data (ND)  | List       | 2  | All |
| AN35 | Mandatory | dynamic | <b>Payment Frequency</b>   | Loan Level Information | List    | Payment Frequency: Weekly (1) Fortnightly (2) Monthly (3) Quarterly (4) Semi Annually (5) Annually (6) Other (7) No Data (ND)   | List       | 2  | All |
| AN36 | Mandatory | dynamic | <b>Scheduled Payment Due</b>   | Loan Level Information | Numeric | The next contractual scheduled payment due (the payment due if there are no other payment arrangements in force).   | 9(11).99   | 14 | All |

|      |           |         |   |                        |         |  |           |    |     |
|------|-----------|---------|---|------------------------|---------|--|-----------|----|-----|
| AN37 | Mandatory | Static  | <b>Loan Purpose</b>                       | Loan Level Information | List    | Loan Purpose:<br>Tuition Fees (1)<br>Living Expenses (2)<br>Medical (3)<br>Home Improvements (4)<br>Appliance/Furniture (5)<br>Travel (6)<br>Debt Consolidation (7)<br>New Car (8)<br>Used Car (9)<br>Other Vehicle (10)<br>Equipment (11)<br>Property (12)<br>Other (13) No Data (ND) | List      | 2  | All |
| AN38 | Mandatory | Static  | <b>Customer Type</b>                      | Loan Level Information | List    | Customer Type:<br>New (1)<br>Existing (2)<br>Other (3)<br>No Data (ND)   | List      | 2  | All |
| AN39 | Optional  | dynamic | <b>Annual Percentage Rate</b>             | Loan Level Information | Numeric | Annual Percentage Rate (APR). The yearly cost of the loan, including interest, insurance and the origination fee, expressed as a percentage.   | 9(4).9(8) | 13 | All |
| AN40 | Mandatory | dynamic | <b>Current Interest Rate Distribution</b> | Loan Level Information | Numeric | Current interest rate (%) of the loan  | 9(4).9(8) | 13 | All |
| AN41 | Mandatory | dynamic | <b>Current Interest Rate Basis</b>        | Loan Level Information | List    | Current interest rate basis Fixed (1)<br>ECB Base rate (2) 1m Euribor (3)<br>3m Euribor (4)<br>12m Euribor (5) UK Base Rate (6) SONIA (6A)<br>Lender's SVR (10)<br>Other (11) No Data (ND)   | List      | 2  | All |
| AN42 | Mandatory | dynamic | <b>Account Status</b>                     | Loan Level Information | List    | Current status of account: Performing (1)<br>Restructured - No Arrears (2) Restructured - Arrears (3) Defaulted (4)<br>Arrears (5)<br>Redeemed (6)<br>Other (7)<br>No Data (ND)  | List      | 2  | All |

|             |           |         |  |                         |         |   |            |    |     |
|-------------|-----------|---------|--|-------------------------|---------|---|------------|----|-----|
| <b>AN43</b> | Mandatory | dynamic | <b>Arrears Balance</b>                   | Loan Level Information  | Numeric | Current balance of arrears. Arrears defined as:<br>Total payments due to date<br>LESS Total payments received to date LESS<br>any amounts capitalised.<br>This should not include any fees applied to the<br>account.<br><br>If the loan is not in arrears enter a balance of 0 | 9(11).99   | 14 | All |
| <b>AN44</b> | Mandatory | dynamic | <b>Arrears Balance Capitalised</b>       | Loan Level Information  | Numeric | Total current capitalised arrears balance.  | 9(11).99   | 14 | All |
| <b>AN45</b> | Mandatory | dynamic | <b>Number of Days in Arrears</b>         | Loan Level Information  | Numeric | Number of days the loan is in arrears as of the pool cut off date.  | Numeric    | 3  | All |
| <b>AN46</b> | Mandatory | dynamic | <b>Origination Channel</b>               | Loan Level Information  | List    | Channel of Origination: Dealer (1)<br>Broker (2)<br>Direct (3)<br>Indirect (4)<br>Other (5)<br>No Data (ND)   | List       | 2  | All |
| <b>AN47</b> | Optional  | dynamic | <b>Payment Method</b>                    | Loan Level Information  | List    | Method of Payment:<br>Direct debit (1)<br>Cash (2)<br>Bank transfer (not direct debit) (3) Cheque (4)<br>Other (5)<br>No Data (ND)  | List       | 2  | All |
| <b>AN48</b> | Optional  | dynamic | <b>Number of Borrowers</b>               | Loan Level Information  | Numeric | Number of borrowers to the Loan   | Numeric    | 3  | All |
| <b>AN49</b> | Mandatory | dynamic | <b>Percentage of Prepayments allowed</b> | Loan Level Information  | Numeric | Maximum percentage of the outstanding balance allowed annually as a prepayment without incurring a penalty  | 9(4).9(8)  | 13 | All |
| <b>AN50</b> | Mandatory | dynamic | <b>Early Repayment Charges</b>           | Loan Level Information  | Numeric | Percentage of the outstanding balance which is payable as a charge if the prepayment limit is exceeded  | 9(11).99   | 14 | All |
| <b>AN51</b> | Mandatory | dynamic | <b>Set off amount</b>                    | Loan Level Information  | Numeric | If the originator holds deposits from the borrower, its the amount of the deposit that they set off against the loan.   | 9(11).99   | 14 | All |
| <b>AN55</b> | Mandatory | Static  | <b>Date of Default</b>                   | Performance Information | Date    | The date of default.  | DD-MM-YYYY | 10 | All |
| <b>AN56</b> | Mandatory | dynamic | <b>Cumulative Recoveries</b>             | Performance Information | Numeric | Cumulative recoveries – only relevant for cases with losses.  | 9(11).99   | 14 | All |
| <b>AN58</b> | Mandatory | dynamic | <b>Gross Defaults</b>                    | Performance Information | Numeric | Cumulative gross defaults   | 9(11).99   | 14 | All |
| <b>AN59</b> | Optional  | dynamic | <b>Gross Losses</b>                      | Performance Information | Numeric | Cumulative gross losses   | 9(11).99   | 14 | All |

|                  |           |         |   |                            |              |  |              |     |     |
|------------------|-----------|---------|---|----------------------------|--------------|--|--------------|-----|-----|
| <b>AN60</b>      | Optional  | dynamic | <b>Net Losses</b>                         | Performance Information    | Numeric      | Cumulative net losses  | 9(11).99     | 14  | All |
| <b>AN83</b>      | Optional  | Static  | <b>Associated Insurance</b>               | Core                       | Y / N / ND   |  | Y / N / ND   | 2   | All |
| <b>AN84</b>      | Optional  | Static  | <b>Insurance Type</b>                     | Core                       | List         | Life, Accident, Sickness & Unemployment Insurance (1) Life, Accident &Sickness Insurance(2) Accident, Sickness, & Unemployment (3) Accident & Sickness Insurance (4) Other (5) No Data (ND)  | List         | 2   | All |
| <b>AN85</b>      | Optional  | Dynamic | <b>Insurance Amount</b>                   | Core                       | Numeric      | Insurance balance - amount which insurance currently covers  | 9(11).99     | 14  | All |
| <b>AN86</b>      | Optional  | Dynamic | <b>Insurance premium</b>                  | Core                       | Numeric      | Insurance premium  | 9(11).99     | 14  | All |
| <b>AN87</b>      | Optional  | Static  | <b>Insurance Payment Frequency</b>        | Core                       | List         | Payment Frequency: Weekly (1)<br>Fortnightly (2)<br>Monthly (3)<br>Quarterly (4)<br>Semi Annually (5)<br>Annually (6)<br>Other (7)<br>No Data (ND)   | List         | 2   | All |
| <b>AN88</b>      | Optional  | Static  | <b>insurance provider</b>                 | Core                       | Text         | Name of the insurance provider for this borrower   | Text         | 50  | All |
| <b>AN99SECN</b>  | Mandatory | Static  | <b>Securitisation unique identifier</b>   | Securitisation Information | Text/Numeric | The unique identifier assigned by the reporting entity in accordance with SECN 11.12. The reporting entity must not amend this unique identifier.<br>For example, for a Non-ABCP securitisation the unique identifier is composed of the following elements: [LEI of reporting entity+N+year of first issuance under the securitisation+[01, 02, 03, etc.]]. | Text/Numeric | 28  | All |
| <b>AN100SECN</b> | Mandatory | Static  | <b>Originator Name</b>                    | Securitisation Information | Text/Numeric | Give the full legal name of the underlying exposure originator, involved in the securitisation. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   | Text/Numeric | 100 | All |
| <b>AN101SECN</b> | Mandatory | Static  | <b>Originator Legal Entity Identifier</b> | Securitisation Information | Text/Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the underlying exposure originator.   | Text/Numeric | 20  | All |
| <b>AN102SECN</b> | Mandatory | Static  | <b>Originator Establishment</b>           | Securitisation Information | List         | Country where the underlying exposure originator is established.   | Text/Numeric | 50  | All |

|                  |           |         |   |                            |              |   |                 |     |     |
|------------------|-----------|---------|---|----------------------------|--------------|---|-----------------|-----|-----|
|                  |           |         |   |                            |              |   |                 |     |     |
| <b>AN103SECN</b> | Mandatory | Static  | <b>Original Lender Name</b>                     | Securitisation Information | Text/Numeric | Give the full legal name of the original lender. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   | Text/Numeric    | 100 | All |
| <b>AN104SECN</b> | Mandatory | Static  | <b>Original Lender Legal Entity Identifier</b>  | Securitisation Information | Text/Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the original lender.   | Text/Numeric    | 20  | All |
| <b>AN105SECN</b> | Mandatory | Static  | <b>Original Lender Establishment Country</b>    | Securitisation Information | List         | Country where the original lender is established.   | Text/Numeric    | 50  | All |
| <b>AN106SECN</b> | Mandatory | Static  | <b>Credit Impaired Obligor (STS only)</b>       | Securitisation Information | Y / N / ND   | Confirm that at the time that this underlying exposure was selected for transfer to the SSPE, the exposure met the criteria set out in SECN 2.2.12R(2) and SECN 2.2.12R(3) regarding exposures in default, exposures to a credit-impaired debtor or guarantor and exposures which have undergone a debt restructuring process.  | Y / N / ND      | 2   | All |
| <b>AN107SECN</b> | Mandatory | Static  | <b>Number Of Payments Before Securitisation</b> | Securitisation Information | Numeric      | Enter the number of payments made prior to the exposure being transferred to the securitisation.  | 9(3)            | 12  | All |
| <b>AN108SECN</b> | Mandatory | Dynamic | <b>Date Of Restructuring</b>                    | Performance information    | Date / ND    | Enter the date at which the underlying exposure has been restructured. Restructuring refers to any changes made to the contractual terms of the underlying exposure agreement due to forbearance, including payment holidays, arrears capitalisation, change of interest rate basis or margins, fees, penalties, maturity and/or other generally-accepted measures of restructuring due to forbearance. | DD-MM-YYYY / ND | 10  | All |
| <b>AN109SECN</b> | Mandatory | Dynamic | <b>Date Last In Arrears</b>                     | Performance information    | Date / ND    | Date the obligor was last in arrears.   | DD-MM-YYYY / ND | 10  | All |
| <b>AN110SECN</b> | Mandatory | Dynamic | <b>Cumulative Pre-payments</b>                  | Performance information    | Numeric      | Total prepayments collected as at the data cut-off date (prepayments defined as unscheduled principal payment) since the underlying exposure origination date   | 9(11).99        | 14  | All |
| <b>AN111SECN</b> | Mandatory | dynamic | <b>Current Interest Rate Margin</b>             | Loan Level Information     | Numeric      | Where applicable, the current interest rate margin of the floating-   | 9(4).9(8)       | 13  | All |

|  |  |  |  |  |  |   |  |  |  |  |
|--|--|--|--|--|--|---|--|--|--|--|
|  |  |  |  |  |  | rate underlying exposure over (or under, in which case input as a negative) the index rate. |  |  |  |  |
|--|--|--|--|--|--|---|--|--|--|--|

SECN 11 Annex 7 is deleted in its entirety. The deleted text is not shown but the annex is marked [deleted] as shown below.

**11            Underlying exposures information—Credit card [deleted]**  
**Annex 7**

SECN 11 Annex 8 is deleted in its entirety and replaced with the following. The text is not underlined.

*[Editor's note: the form that currently forms part of SECN 11 Annex 8 is to be marked as 'superseded'.]*

**11            Underlying exposures information— Leasing**  
**Annex 8**

11            R        *[Editor's note: insert link to document containing 'Underlying exposures information – Leasing'.]*

## SECN 11 Annex 8: Underlying exposures - leasing

| Field Number | Priority  | TAG     | Field Name                         | Category          | Data Type    | Field Definition & Criteria   | Data Type / Format | Maximum Length | Jurisdictions |
|--------------|-----------|---------|------------------------------------|-------------------|--------------|---|--------------------|----------------|---------------|
| AL1          | Mandatory | dynamic | Pool Cut-off Date                  | Core              | Date         | Pool or Portfolio cut-off date. All dates take DD-MM-YYYY format  | DD-MM-YYYY         | 10             | All           |
| AL3          | Mandatory | static  | Lease Identifier                   | Core              | Text/Numeric | Unique identifier (ID) for each Lease. The Lease ID should not change through the life of the transaction.  | Text/Numeric       | 100            | All           |
| AL5          | Optional  | static  | Servicer Identifier                | Core              | Text/Numeric | Unique identifier per servicer to flag which entity is servicing the Lease  | Text/Numeric       | 100            | All           |
| AL6          | Optional  | dynamic | Servicer Name                      | Core              | Text         | Servicer name   | Text               | 100            | All           |
| AL8          | Mandatory | static  | Lessee Identifier                  | Core              | Text/Numeric | Unique identifier (ID) per Lessee (not showing the real name) - to enable Lessees with multiple Leases in the pool to be identified (e.g. further advances / second liens are shown as separate entries). Should not change over the life of the transaction<br>If more than one Lessee list the Lessee ID's comma delimited with primary Lessee first. | Text/Numeric       | 100            | All           |
| AL9          | Mandatory | static  | Lessee Legal Form / Business Type  | Core              | List         | Public Company (1)<br>Limited Company (2)<br>Partnership (3)<br>Individual (4)<br>Government Entity (5) No Data (ND)  | List               | 2              | All           |
| AL10         | Mandatory | dynamic | Group Company Identifier           | Core              | Text/Numeric | Unique group company identifier   | Text/Numeric       | 100            | All           |
| AL67         | Mandatory | dynamic | Amortisation Type                  | Lease Information | List         | Amortisation type:<br>Annuity (1)<br>Linear (2)<br>French (3)<br>Fix Amortisation Schedule (4) Bullet (5)<br>Partial Bullet (6)<br>Revolving (7)<br>Other (8)<br>No Data (ND)   | List               | 12             | All           |
| AL69         | Mandatory | dynamic | Balloon Amount                     | Lease Information | Numeric      | The balloon payment amount  | 9(11).99           | 14             | All           |
| AL72         | Mandatory | static  | Lease type                         | Lease Information | List         | Financial (1)<br>Operational (2)<br>Other (3)<br>No Data (ND)   | List               | 12             | All           |
| AL73         | Mandatory | static  | Current Securitised Residual Value | Lease Information | Numeric      | Amount of the most recent forecast residual value of the securitised asset  | 9(11).99           | 14             | All           |

|              |           |         |   |                           |         |   |            |     |     |
|--------------|-----------|---------|---|---------------------------|---------|---|------------|-----|-----|
| <b>AL74</b>  | Mandatory | static  | <b>Date of Current Securitised Residual Value</b> | Lease Information         | Date    | The date which the Current Securitised Residual Value was most recently updated.  | DD-MM-YYYY | 12  | All |
| <b>AL80</b>  | Mandatory | static  | <b>Interest Rate Type</b>                         | Interest Rate Information | List    | Interest rate type:<br>Floating rate Lease (for life) (1)<br>Floating rate Lease linked to SONIA, Euribor, BoE reverting to the Bank's standard variable rate (SVR), ECB reverting to Bank's SVR (2)<br>Fixed rate Lease (for life) (3)<br>Fixed with future periodic resets (4)<br>Fixed rate Lease with compulsory future switch to floating (5)<br>Capped (6)<br>Discount (7)<br>Other (8)<br>No Data (ND) | List       | 2   | All |
| <b>AL81</b>  | Mandatory | dynamic | <b>Current Interest Rate Index</b>                | Interest Rate Information | List    | Current interest rate index (the reference rate off which the lease interest rate is set):<br>SONIA (1A)<br>1 month EURIBOR (2)<br>3 month EURIBOR (4)<br>6 month EURIBOR (6)<br>12 month EURIBOR (8)<br>BoE Base Rate (9) ECB Base Rate (10)<br>Standard Variable Rate (11) Other (12)<br>No Data (ND)   | List       | 2   | All |
| <b>AL82</b>  | Mandatory | dynamic | <b>Current Interest Rate</b>                      | Interest Rate Information | Numeric | Current interest rate (%).  | 9(4).9(8)  | 13  | All |
| <b>AL83</b>  | Mandatory | dynamic | <b>Current Interest Rate Margin</b>               | Interest Rate Information | Numeric | Current interest rate margin (for fixed rate Leases this is the same as the current interest rate, for floating rate Leases this is the margin over (or under if input as a negative) the index rate.   | 9(4).9(8)  | 13  | All |
| <b>AL90</b>  | Mandatory | static  | <b>Interest Reset Period</b>                      | Interest Rate Information | List    | Annual (1)<br>Semi-annual (2)<br>Quarterly (3)<br>Monthly (4)<br>Not apply (5)<br>Other (6)<br>No Data (ND)   | List       | 12  | All |
| <b>AL100</b> | Optional  | static  | <b>Turnover of Lessee</b>                         | Financial Information     | Numeric | Annual turnover of the Lessee   | 9(10)      | 10  | All |
| <b>AL115</b> | Mandatory | static  | <b>Country of Asset</b>                           | Collateral Information    | List    | Follow ISO classification   | List       | 12  | All |
| <b>AL116</b> | Mandatory | static  | <b>Asset Manufacturer</b>                         | Collateral Information    | Text    | Name of the manufacturer  | Text       | 100 | All |
| <b>AL117</b> | Mandatory | static  | <b>Asset Name/Model</b>                           | Collateral Information    | Text    | Name of the asset/model   | Text       | 100 | All |

|              |           |         |   |                        |         |  |           |    |     |
|--------------|-----------|---------|---|------------------------|---------|--|-----------|----|-----|
| <b>AL118</b> | Mandatory | static  | <b>Year of Manufacture / Construction</b> | Collateral Information | Date    | Year of manufacture  | YYYY / ND | 12 | All |
| <b>AL119</b> | Mandatory | static  | <b>New or Used Asset</b>                  | Collateral Information | List    | Condition it went into the pool<br>New (1)<br>Used (2)<br>Demo (3)   | List      | 12 | All |
| <b>AL120</b> | Mandatory | static  | <b>Expected Residual Value</b>            | Collateral Information | Numeric | Expected Residual Value of the Asset at the end of the Lease at the time the assets were securitised   | 9(11).99  | 14 | All |
| <b>AL121</b> | Mandatory | static  | <b>Asset Type</b>                         | Collateral Information | List    | Auto Vehicles (1)<br>Industrial Vehicles (2)<br>Commercial Trucks (3)<br>Rail Vehicles (4)<br>Nautical Commercial Vehicles (5) Nautical Leisure Vehicles (6)<br>Aeroplanes (7)<br>Machine Tools (8)<br>Industrial Equipment (9)<br>Office Equipment (10)<br>Medical Equipment (11) Energy Related Equipment (12)<br>Commercial Building (13)<br>Residential Building (14)<br>Industrial Building (15)<br>Energy Related Real Estate (16) IT Equipment (17)<br>Other Vehicles (18)<br>Other Equipment (19) Other Real Estate (20) | List      | 12 | All |
| <b>AL126</b> | Mandatory | static  | <b>Original Valuation amount</b>          | Collateral Information | Numeric | Latest asset valuation prior to securitisation   | 9(11).99  | 14 | All |
| <b>AL127</b> | Mandatory | static  | <b>Original Valuation type</b>            | Collateral Information | List    | Valuation type at origination:<br>Full (1)<br>Drive-by (2)<br>AVM (flag as AVM only if this type of valuation has been used for origination purposes) (3)<br>Indexed (4)<br>Desktop (5)<br>Managing Agent / Estate Agent (6) Purchase Price (7)<br>Hair Cut (8)<br>Other (9)<br>No Data (ND)   | List      | 12 | All |
| <b>AL128</b> | Mandatory | static  | <b>Original Valuation date</b>            | Collateral Information | date    | Date of latest asset valuation prior to securitisation.  | MM-YYYY   | 12 | All |
| <b>AL129</b> | Mandatory | dynamic | <b>Updated Valuation amount</b>           | Collateral Information | Numeric | Latest asset valuation   | 9(11).99  | 14 | All |

|       |           |         |   |                         |            |   |            |    |     |
|-------|-----------|---------|---|-------------------------|------------|---|------------|----|-----|
| AL130 | Mandatory | dynamic | <b>Updated Valuation type</b>   | Collateral Information  | List       | Valuation type at most recent valuation date:<br>Full (1)<br>Drive-by (2)<br>AVM (flag as AVM only if this type of valuation has been used for origination purposes) (3)<br>Indexed (4)<br>Desktop (5)<br>Managing Agent / Estate Agent (6) Purchase Price (7)<br>Hair Cut (8)<br>Other (9)<br>No Data (ND) | List       | 12 | All |
| AL131 | Mandatory | dynamic | <b>Updated Valuation date</b>   | Collateral Information  | date       | Date of latest asset valuation.   | MM-YYYY    | 12 | All |
| AL140 | Mandatory | dynamic | <b>Account Status</b>   | Performance Information | List       | Current status of account: Performing (1)<br>Arrears (2)<br>Default or Foreclosure (3) Redeemed (4) Repurchased by Seller (5) Other (6)<br>Restructured - No Arrears (7) Restructured - Arrears (8)<br>No Data (ND)   | List       | 12 | All |
| AL142 | Optional  | dynamic | <b>Date Last in Arrears</b>   | Performance Information | Date / ND  | Date the Lessee was last in arrears. If the Lessee is current the date they were last in arrears.   | DD-MM-YYYY | 12 | All |
| AL143 | Mandatory | dynamic | <b>Arrears Balance</b>  | Performance Information | Numeric    | Current balance of arrears. Arrears defined as: Total payments due to date LESS Total payments received to date LESS any amounts capitalised. This should not include any fees applied to the account.  | 9(11).99   | 14 | All |
| AL144 | Mandatory | dynamic | <b>Number Months in Arrears</b>   | Performance Information | Numeric    | Number of months this Lease is in arrears (at pool cut off date) according to the definition of the issuer.   | 9(10)      | 10 | All |
| AL149 | Mandatory | dynamic | <b>Sale Price</b>   | Performance Information | Numeric    | Price achieved on sale of asset in case of foreclosure.   | 9(11).99   | 14 | All |
| AL150 | Mandatory | dynamic | <b>Loss on Sale</b>   | Performance Information | Numeric    | Total loss net of fees, accrued interest etc. after application of sale proceeds (excluding prepayment charge if subordinate to principal recoveries). Show any gain on sale as a negative number.  | 9(11).99   | 14 | All |
| AL151 | Mandatory | dynamic | <b>Cumulative Recoveries</b>  | Performance Information | Numeric    | Cumulative recoveries – only relevant for cases with losses.  | 9(11).99   | 14 | All |
| AL156 | Mandatory | dynamic | <b>Default or Foreclosure on the Lease per the transaction definition</b> | Performance Information | Y / N      | Whether there has been a default or foreclosure on the Lease per the transaction definition.  | Y / N / ND | 12 | All |
| AL157 | Mandatory | dynamic | <b>Default or Foreclosure</b>   | Performance Information | Y / N / ND | Whether there has been a default or foreclosure on the Lease per Basel III definition.  | Y / N / ND | 12 | All |

|                   |           |         | <b>on the Lease per Basel III definition</b>     |                            |              |  |              |     |         |
|-------------------|-----------|---------|--|----------------------------|--------------|--|--------------|-----|---------|
| <b>AL158</b>      | Mandatory | dynamic | <b>Reason for Default (Basel III definition)</b> | Performance Information    | List         | Using Basel III Definition Reason for default: Bankruptcy / Insolvency (1)<br>Failure to Pay (2) Breach of Terms (3) Other (4)<br>No Data (ND)   | List         | 12  | All     |
| <b>AL159</b>      | Mandatory | dynamic | <b>Default Date</b>                              | Performance Information    | Date         | Date the Lease defaulted per the transaction default definition.   | DD-MM-YYYY   | 12  | All     |
| <b>AL160</b>      | Mandatory | dynamic | <b>Default Amount</b>                            | Performance Information    | Numeric      | Total default amount (per the transaction default definition) before the application of sale proceeds and recoveries.  | 9(11).99     | 14  | All     |
| <b>AL163</b>      | Optional  | dynamic | <b>Recovery Source</b>                           | Performance Information    | List         | The source of the recoveries: Liquidation of Collateral (1)<br>Enforcement of Guarantees (2) Additional Lending (3)<br>Cash Recoveries (4)<br>Mixed (5)<br>Other (6)<br>No Data (ND)   | List         | 12  | All     |
| <b>AL166</b>      | Mandatory | dynamic | <b>Allocated Losses</b>                          | Performance Information    | Numeric      | The allocated losses to date.  | 9(11).99     | 14  | All     |
| <b>AL167</b>      | Optional  | dynamic | <b>Redemption Date</b>                           | Performance Information    | Date         | Date on which account redeemed.  | DD-MM-YYYY   | 12  | All     |
| <b>AL199</b>      | Optional  | dynamic | <b>Voluntary Termination?</b>                    | Termination Information    | Y / N / ND   | Was the lease be terminated voluntarily?   | Y / N / ND   | 12  | UK only |
| <b>AL200</b>      | Optional  | dynamic | <b>VT Date</b>                                   | Termination Information    | Date         | Voluntary Termination Date   | DD-MM-YYYY   | 12  | UK only |
| <b>AL201</b>      | Optional  | dynamic | <b>VT Amount</b>                                 | Termination Information    | Numeric      | Outstanding Balance as of Termination Date   | 9(11).99     | 14  | UK only |
| <b>AL202</b>      | Optional  |         | <b>VT Sale Date</b>                              | Termination Information    | Date         | Date of sale of asset returned in case of voluntary termination of contract.   | DD-MM-YYYY   | 12  | UK only |
| <b>AL203</b>      | Optional  | dynamic | <b>VT Sale Price</b>                             | Termination Information    | Numeric      | Price achieved on sale of asset in case of voluntary termination of contract.  | 9(11).99     | 14  | UK only |
| <b>AL204</b>      | Optional  | dynamic | <b>VT Loss on Sale</b>                           | Termination Information    | Numeric      | Total loss net of fees, accrued interest etc. after application of sale proceeds in case of voluntary termination of contract.   | 9(11).99     | 14  | UK only |
| <b>AL215S ECN</b> | Mandatory | Static  | <b>Securitisation unique identifier</b>          | Securitisation Information | Text/Numeric | The unique identifier assigned by the reporting entity in accordance with SECN 11.12. The reporting entity must not amend this unique identifier.<br>For example, for a Non-ABCP securitisation the unique identifier is composed of the following elements: [LEI of reporting entity+N+year of first issuance under the securitisation+[01, 02, 03, etc.]]. | Text/Numeric | 28  | All     |
| <b>AL216S ECN</b> | Mandatory | Static  | <b>Originator Name</b>                           | Securitisation Information | Text/Numeric | Give the full legal name of the underlying exposure originator, involved in the securitisation. Where applicable, the name   | Text/Numeric | 100 | All     |

|                       |           |         |   |                            |              |   |                 |     |     |
|-----------------------|-----------|---------|---|----------------------------|--------------|---|-----------------|-----|-----|
|                       |           |         |   |                            |              | entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   |                 |     |     |
| <b>AL217S<br/>ECN</b> | Mandatory | Static  | <b>Originator Legal Entity Identifier</b>       | Securitisation Information | Text/Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the underlying exposure originator.  | Text/Numeric    | 20  | All |
| <b>AL218S<br/>ECN</b> | Mandatory | Static  | <b>Originator Establishment Country</b>         | Securitisation Information | List         | Country where the underlying exposure originator is established.  | Text/Numeric    | 50  | All |
| <b>AL219S<br/>ECN</b> | Mandatory | Static  | <b>Original Lender Name</b>                     | Securitisation Information | Text/Numeric | Give the full legal name of the original lender. Where applicable, the name entered must match the name associated with the LEI in the Global Legal Entity Foundation (GLEIF) database.   | Text/Numeric    | 100 | All |
| <b>AL220S<br/>ECN</b> | Mandatory | Static  | <b>Original Lender Legal Entity Identifier</b>  | Securitisation Information | Text/Numeric | Where applicable, provide the Legal Entity Identifier (as specified in the Global Legal Entity Foundation (GLEIF) database) of the original lender.   | Text/Numeric    | 20  | All |
| <b>AL221S<br/>ECN</b> | Mandatory | Static  | <b>Original Lender Establishment Country</b>    | Securitisation Information | List         | Country where the original lender is established.   | Text/Numeric    | 50  | All |
| <b>AL222S<br/>ECN</b> | Mandatory | Static  | <b>Credit Impaired Obligor (STS only)</b>       | Securitisation Information | Y / N / ND   | Confirm that at the time that this underlying exposure was selected for transfer to the SSPE, the exposure met the criteria set out in SECN 2.2.12R(2) and SECN 2.2.12R(3) regarding exposures in default, exposures to a credit-impaired debtor or guarantor and exposures which have undergone a debt restructuring process.  | Y / N / ND      | 2   | All |
| <b>AL223S<br/>ECN</b> | Mandatory | Static  | <b>Number Of Payments Before Securitisation</b> | Securitisation Information | Numeric      | Enter the number of payments made prior to the exposure being transferred to the securitisation.  | 9(3)            | 12  | All |
| <b>AL224S<br/>ECN</b> | Mandatory | dynamic | <b>Date Of Restructuring</b>                    | Performance information    | Date / ND    | Enter the date at which the underlying exposure has been restructured. Restructuring refers to any changes made to the contractual terms of the underlying exposure agreement due to forbearance, including payment holidays, arrears capitalisation, change of interest rate basis or margins, fees, penalties, maturity and/or other generally-accepted measures of restructuring due to forbearance. | DD-MM-YYYY / ND | 10  | All |
| <b>AL225S<br/>ECN</b> | Mandatory | dynamic | <b>Cumulative Pre-payments</b>                  | Performance information    | Numeric      | Total prepayments collected as at the data cut-off date (prepayments defined as unscheduled principal payment) since the underlying exposure origination date   | 9(11).99        | 14  | All |
| <b>AL226S<br/>ECN</b> | Mandatory | static  | <b>Financial Statement Currency</b>             | Financial Information      | List         | The reporting currency of the financial statements.   | List            | 3   | All |

SECN 11 Annex 9 is deleted in its entirety. The deleted text is not shown but the annex is marked [deleted] as shown below.

**11            Underlying exposures information—Esoterie [deleted]**  
**Annex 9**

SECN 11 Annex 10 is deleted in its entirety and replaced with the following. The text is not underlined.

*[Editor's note: the form that currently forms part of SECN 11 Annex 10 is to be marked as 'superseded'.]*

**11            Underlying exposures information – Add-on for non-**  
**Annex        performing exposures**  
**10**

11            R        *[Editor's note: insert link to document containing 'Underlying exposures information - Add-on for non-performing exposures'.]*

| Field number | Priority  | TAG     | Field Name                       | Category                   | Data Type    | Field Definition & Criteria   | Date type/format | Maximum Length |
|--------------|-----------|---------|----------------------------------|----------------------------|--------------|---|------------------|----------------|
| NP1          | Mandatory | Static  | Securitisation Unique Identifier | Securitisation Information | Text/Numeric | The unique identifier assigned by the reporting entity in accordance with SECN 11.12. The reporting entity must not amend this unique identifier.<br>For example, for a Non-ABCP securitisation the unique identifier is composed of the following elements: [LEI of reporting entity+N+year of first issuance under the securitisation+[01, 02, 03, etc.]].                          | Text/Numeric     | 28             |
| NP2          | Mandatory | Static  | Loan Identifier                  | Loan Information           | Text/Numeric | Unique loan identifier. The identifier must be different from any external identification number, in order to ensure anonymity of the obligor. The reporting entity must not amend this unique identifier. This entry must match the loan identifier field in the accompanying underlying exposures template being completed for this specific underlying exposure.                   | Text/Numeric     | 50             |
| NP3          | Mandatory | Static  | Obligor Identifier               | Loan Information           | Text/Numeric | Unique obligor identifier. The identifier must be different from any external identification number, in order to ensure anonymity of the obligor. The reporting entity must not amend this unique identifier. This entry must match the obligor or borrower identifier field in the accompanying underlying exposures template being completed for this specific underlying exposure. | Text/Numeric     | 50             |
| NP4          | Mandatory | Dynamic | Pool Cut-Off Date                | Loan Information           | Date         | Pool or portfolio cut-off date.   | DD-MM-YYYY       | 10             |
| NP5          | Mandatory | Dynamic | In Receivership                  | Loan Information           | Y / N / ND   | Indicator as to whether the obligor is in receivership  | Y / N / ND       | 2              |
| NP6          | Mandatory | Dynamic | Date of Last Contact             | Loan Information           | Date         | Date of last direct contact with the obligor  | DD-MM-YYYY       | 10             |
| NP7          | Mandatory | Dynamic | Deceased                         | Loan Information           | Y / N / ND   | Indicator as to whether the obligor has passed away   | Y / N / ND       | 2              |

|      |           |         |   |                  |               |   |              |      |
|------|-----------|---------|---|------------------|---------------|---|--------------|------|
| NP8  | Mandatory | Static  | Legal status of obligor                     | Loan Information | List          | <p>The type of legal status of the obligor.</p> <p>Listed Corporate is a corporate entity whose shares are quoted and traded on a stock exchange (LCRP)</p> <p>Unlisted Corporate is a corporate entity whose shares are not quoted and traded on a stock exchange, however an unlisted corporate may have an unlimited number of shareholders to raise capital for any commercial venture (UCRP)</p> <p>Listed Fund is a fund whose shares are quoted and traded on a stock exchange (LFND)</p> <p>Unlisted Fund is a fund whose shares are not quoted and traded on a stock exchange (UFND)</p> <p>Partnership is where the sponsor constitutes a group of individuals who form a legal partnership, where profits and liabilities are shared (PSHP)</p> <p>Private Individual (INDV)</p> | List         | 4    |
| NP9  | Mandatory | Dynamic | Legal Procedure Type                        | Loan Information | List          | <p>Type of the insolvency process the obligor is currently in:</p> <p>Corporate Restructuring Procedure, which also includes funds (CPRR) Corporate Insolvency Procedure, which also includes funds (CPRI)</p> <p>Private Individual Obligor Debt Compromise Procedure (PRCM) Private Individual Obligor Insolvency Procedure (PRIP)</p> <p>Partnership Restructuring Procedure (PRTR) Partnership Insolvency Procedure (PRIS)</p> <p>Other (OTHR)</p>  | List         | 4    |
| NP10 | Mandatory | Dynamic | Legal Procedure Name                        | Loan Information | Text/ Numeric | Name of the legal procedure which provides an indication of how advanced the relevant procedure has become, depending on the country where the obligor is located.  | Text/Numeric | 1000 |
| NP11 | Mandatory | Dynamic | Legal Actions Completed                     | Loan Information | Text/ Numeric | Description of the legal actions completed for the obligor.   | Text/Numeric | 1000 |
| NP12 | Mandatory | Static  | Date of Entering Into Current Legal Process | Loan Information | Date          | Date that the obligor entered into their current legal procedure.   | DD-MM-YYYY   | 10   |

|      |           |         |   |                  |               |   |              |      |
|------|-----------|---------|---|------------------|---------------|---|--------------|------|
| NP13 | Mandatory | Static  | Date of Insolvency Practitioner Appointment       | Loan Information | Date          | Date that the insolvency practitioner was appointed.  | DD-MM-YYYY   | 10   |
| NP14 | Mandatory | Dynamic | Number of Current Judgements                      | Loan Information | Numeric       | Number of outstanding court enforcement orders against the obligor.   | 9(4)         | 5    |
| NP15 | Mandatory | Dynamic | Number of Discharged Judgements                   | Loan Information | Numeric       | Number of discharged court enforcement orders against the obligor.  | 9(4)         | 5    |
| NP16 | Mandatory | Static  | Date when Demand Notice was issued                | Loan Information | Date          | Date that a demand notice was sent by solicitors who act on behalf of the Institution   | DD-MM-YYYY   | 10   |
| NP17 | Mandatory | Static  | Date when Reservation of Rights Letter Was Issued | Loan Information | Date          | Date that the reservation of rights letter was issued by the Institution  | DD-MM-YYYY   | 10   |
| NP18 | Mandatory | Static  | Court Jurisdiction                                | Loan Information | List          | Location of the court where the case is being heard   | Text/Numeric | 50   |
| NP19 | Mandatory | Static  | Date of Obtaining Order for Possession            | Loan Information | Date          | Date that the order for possession is granted by the court  | DD-MM-YYYY   | 10   |
| NP20 | Optional  | Dynamic | Comments on Other Litigation Related Process      | Loan Information | Text/ Numeric | Further comments or details if there are other litigation processes in place  | Text/Numeric | 1000 |
| NP21 | Mandatory | Static  | Governing Law                                     | Loan Information | List          | Jurisdiction governing the loan agreement. This does not necessarily correspond to the country where the loan was originated.                                     | Text/Numeric | 50   |
| NP22 | Mandatory | Static  | Bespoke Repayment Description                     | Loan Information | Text/ Numeric | Description of the bespoke repayment profile when "Other" is selected in field "Amortisation Type" or "Payment Type" or "Repayment Method"                        | Text/Numeric | 1000 |
| NP23 | Mandatory | Static  | Start Date of Interest Only Period                | Loan Information | Date          | Date that the current interest repayment only period starts.  | DD-MM-YYYY   | 10   |
| NP24 | Mandatory | Static  | End Date of Interest Only Period                  | Loan Information | Date          | Date that the interest repayment only period ends.  | DD-MM-YYYY   | 10   |
| NP25 | Mandatory | Static  | Start Date of Current Fixed Interest Period       | Loan Information | Date          | Date that the current fixed interest period started.  | DD-MM-YYYY   | 10   |
| NP26 | Mandatory | Static  | End Date of Current Fixed Interest Period         | Loan Information | Date          | Date that the current fixed interest period ends.   | DD-MM-YYYY   | 10   |
| NP27 | Mandatory | Static  | Current Reversion Interest Rate                   | Loan Information | Numeric       | Current level of reversion interest rate according to the loan agreement.   | 9(4).9(8)    | 13   |
| NP28 | Mandatory | Static  | Last Payment Date                                 | Loan Information | Date          | Date that the last payment was made   | DD-MM-YYYY   | 10   |
| NP29 | Optional  | Static  | Syndicated Portion                                | Loan Information | Numeric       | Percentage of the portion held by the Institution when "Yes" is selected in the field named "Syndicated" in the applicable Annex for the non-performing exposure. | 9(4).9(8)    | 13   |
| NP30 | Optional  | Dynamic | MARP Entry  | Loan Information | Date          | Date loan entered current MARP status   | DD-MM-YYYY   | 10   |

|      |           |         |                                    |                  |            |   |            |    |
|------|-----------|---------|------------------------------------|------------------|------------|---|------------|----|
| NP31 | Optional  | Dynamic | MARP Status                        | Loan Information | List       | The status of the current Mortgage Arrears Resolution Process:<br><br>Not in MARP (NMRP)<br>Exited MARP (EMRP)<br>Provision 23, 31 days in arrears (MP23) Provision 24, Financial difficulty (MP24)<br>Provision 28, Not co-operating warning (MP28) Provision 29, Not co-operating (MP29)<br>Provision 42, Restructure offer (MP42)<br>Provision 45, Restructure declined by seller (MP45) Provision 47, Restructure declined by borrower (MP47) Self-Cure (MPSC)<br>Alternative Repayment Arrangement (MPAR) Other (OTHR) | List       | 4  |
| NP32 | Mandatory | Static  | External Collections Level         | Loan Information | Y / N / ND | Indicator as to whether the external collections have been prepared on an obligor level or at loan level  | Y / N / ND | 2  |
| NP33 | Mandatory | Static  | Repayment Plan                     | Loan Information | Y / N / ND | Indicator as to whether a repayment plan has been agreed with the external collection agency  | Y / N / ND | 2  |
| NP34 | Mandatory | Static  | Forbearance Level                  | Loan Information | Y / N / ND | Indicator as to whether forbearance has been prepared on an obligor level or at loan level  | Y / N / ND | 2  |
| NP35 | Mandatory | Static  | Date of First Forbearance          | Loan Information | Date       | Date that the first forbearance happened  | DD-MM-YYYY | 10 |
| NP36 | Mandatory | Dynamic | Number of Historical Forbearance   | Loan Information | Numeric    | Number of forbearance(s) that happened in the past  | 9(4)       | 5  |
| NP37 | Mandatory | Static  | Principal Forgiveness              | Loan Information | Numeric    | Amount of the principal that was forgiven as part of current forbearance, including principal forgiveness agreed by external collection agencies  | 9(11).99   | 14 |
| NP38 | Mandatory | Static  | Date of Principal Forgiveness      | Loan Information | Date       | Date that the principal forgiveness happened  | DD-MM-YYYY | 10 |
| NP39 | Mandatory | Static  | End Date of Forbearance            | Loan Information | Date       | Date that the current forbearance arrangement ends  | DD-MM-YYYY | 10 |
| NP40 | Mandatory | Static  | Repayment Amount Under Forbearance | Loan Information | Numeric    | Periodic repayment amount that the Institution and obligor agreed under the current forbearance terms   | 9(11).99   | 14 |

|      |           |         |                                    |                        |              |   |              |      |
|------|-----------|---------|------------------------------------|------------------------|--------------|---|--------------|------|
| NP41 | Mandatory | Static  | Collateral Identifier              | Collateral Information | Text/Numeric | The unique identifier assigned to the collateral or guarantee. The reporting entity must not amend this unique identifier. This entry must match the collateral or property identifier field in the accompanying underlying exposures template being completed for this specific collateral item. | Text/Numeric | 50   |
| NP42 | Mandatory | Static  | VAT Payable                        | Collateral Information | Numeric      | The percentage of VAT payable on the disposal of the Unit   | 9(4).9(8)    | 13   |
| NP43 | Mandatory | Dynamic | Percentage Complete                | Collateral Information | Numeric      | The percentage of development completed since construction started.   | 9(4).9(8)    | 13   |
| NP44 | Mandatory | Dynamic | Enforcement Status                 | Collateral Information | Y / N / ND   | Status of the enforcement process that the collateral is currently in as at cut-off date, e.g. if it is in receivership   | Y / N / ND   | 2    |
| NP45 | Mandatory | Dynamic | Enforcement Status Third Parties   | Collateral Information | Y / N / ND   | Have any other secured creditors have taken steps to enforce security over the asset?   | Y / N / ND   | 2    |
| NP46 | Mandatory | Dynamic | Mortgage Amount Assigned           | Collateral Information | Numeric      | Total amount of the mortgage assigned to the property collateral.   | 9(11).99     | 14   |
| NP47 | Mandatory | Dynamic | Higher Ranking Underlying Exposure | Collateral Information | Numeric      | Amount of higher ranking or higher lien debt secured against the collateral that is not held by the Institution and does not form a part of the pool.   | 9(11).99     | 14   |
| NP48 | Optional  | Dynamic | Enforcement Description            | Collateral Information | Text/Numeric | Comments or description of the stage of enforcement   | Text/Numeric | 1000 |
| NP49 | Mandatory | Static  | Court Appraisal Amount             | Collateral Information | Numeric      | Court appraisal amount of the property or collateral  | 9(11).99     | 14   |
| NP50 | Mandatory | Static  | Date of Court Appraisal            | Collateral Information | Date         | Date that the court appraisal happened  | DD-MM-YYYY   | 10   |
| NP51 | Mandatory | Dynamic | On Market Price                    | Collateral Information | Numeric      | Price of the property or collateral for which it is on the market   | 9(11).99     | 14   |
| NP52 | Mandatory | Dynamic | Offer Price                        | Collateral Information | Numeric      | The highest price offered by potential buyers   | 9(11).99     | 14   |
| NP53 | Mandatory | Static  | Prepare Property for Sale Date     | Collateral Information | Date         | Prepare property or collateral for sale date  | DD-MM-YYYY   | 10   |
| NP54 | Mandatory | Static  | Property on Market Date            | Collateral Information | Date         | Collateral on market date, i.e. the date when the collateral is advertised and marketed for sale.   | DD-MM-YYYY   | 10   |
| NP55 | Mandatory | Static  | On Market Offer Date               | Collateral Information | Date         | On market offer date  | DD-MM-YYYY   | 10   |
| NP56 | Mandatory | Static  | Sale Agreed Date                   | Collateral Information | Date         | Sale agreed date  | DD-MM-YYYY   | 10   |
| NP57 | Mandatory | Static  | Contracted Date                    | Collateral Information | Date         | Contracted date   | DD-MM-YYYY   | 10   |
| NP58 | Mandatory | Static  | First Auction Date                 | Collateral Information | Date         | Date that the first auction has been performed in order to sell the property or   | DD-MM-YYYY   | 10   |

|                    |           |         |  |                                    |              |   |              |    |
|--------------------|-----------|---------|--|------------------------------------|--------------|---|--------------|----|
|                    |           |         |  |                                    |              | collateral  |              |    |
| <b>NP59</b>        | Mandatory | Static  | Court Auction Reserve Price for First Auction                | Collateral Information             | Numeric      | Court set reserve price for first auction, i.e. minimum price required by the court   | 9(11).99     | 14 |
| <b>NP60</b>        | Mandatory | Dynamic | Next Auction Date  | Collateral Information             | Date         | Date that the next intended auction has been performed in order to sell the property or collateral  | DD-MM-YYYY   | 10 |
| <b>NP61</b>        | Mandatory | Static  | Court Auction Reserve Price for Next Auction                 | Collateral Information             | Numeric      | Court set reserve price for next auction, i.e. minimum price required by the court  | 9(11).99     | 14 |
| <b>NP62</b>        | Mandatory | Static  | Last Auction Date  | Collateral Information             | Date         | Date that the last auction was performed in order to sell the property or collateral  | DD-MM-YYYY   | 10 |
| <b>NP63</b>        | Mandatory | Static  | Court Auction Reserve Price for Last Auction                 | Collateral Information             | Numeric      | Court set reserve price for last auction, i.e. minimum price required by the court  | 9(11).99     | 14 |
| <b>NP64</b>        | Mandatory | Dynamic | Number of Failed Auctions                                    | Collateral Information             | Numeric      | Number of failed previous auctions for the property or collateral   | 9(4)         | 5  |
| <b>NPH1</b>        | Mandatory | Static  | Securitisation Unique Identifier                             | Historical Collections Information | Text/Numeric | Report the same unique identifier here as the one entered into field NP1.   | Text/Numeric | 28 |
| <b>NPH2</b>        | Mandatory | Static  | Loan Identifier  | Historical Collections Information | Text/Numeric | Unique loan identifier. This must match the identifier in field NP2. The reporting entity must not amend this unique identifier.  | Text/Numeric | 50 |
| <b>NPH[3-38]</b>   | Mandatory | Dynamic | Legal Unpaid Balance at month n                              | Historical Collections Information | Numeric      | History of total legal unpaid balance in the thirty-six months previous to the pool cut-off date, each monthly amount reported in a separate field. Start with the most recent month in field NPH3 and end with the oldest month in NPH38.  | 9(11).99     | 14 |
| <b>NPH[39-74]</b>  | Mandatory | Dynamic | History of Past-Due Balances at month n                      | Historical Collections Information | Numeric      | History of total past-due balance in the thirty-six months previous to the pool cut-off date, each monthly amount reported in a separate field. Start with the most recent month in field NPH39 and end with the oldest month in NPH74.   | 9(11).99     | 14 |
| <b>NPH[75-110]</b> | Mandatory | Dynamic | History of Repayments - Not from collateral sales at month n | Historical Collections Information | Numeric      | Repayment made by the obligor in the thirty-six months previous to the pool cut-off date, excluding collateral sales, including collections by external collection agencies, each monthly amount reported in a separate field. Start with the most recent month in field NPH75 and end with the oldest month in NPH110. | 9(11).99     | 14 |

|                     |           |         |  |  |         |   |          |    |
|---------------------|-----------|---------|--|--|---------|---|----------|----|
| <b>NPH[111-146]</b> | Mandatory | Dynamic | History of Repayments<br>- From collateral sales<br>at month n | Historical<br>Collections<br>Information | Numeric | Repayment made by the collateral disposal in the thirty-six months previous to the pool cut-off date, each monthly amount reported in a separate field. Start with the most recent month in field NPH111 and end with the oldest month in NPH146. | 9(11).99 | 14 |
|---------------------|-----------|---------|--|--|---------|---|----------|----|

SECN 11 Annex 11 to SECN 11 Annex 15 are deleted in their entirety. The deleted text is not shown but the annexes are marked [deleted] as shown below.

- 11 **Underlying exposures information—asset backed commercial paper [deleted]**  
 Annex 11
- 11 **Investor report information—Non-asset backed commercial paper securitisation [deleted]**  
 Annex 12
- 11 **Investor report information—Asset backed commercial paper securitisation [deleted]**  
 Annex 13
- 11 **Inside information or significant event information—Non-asset backed commercial paper securitisation [deleted]**  
 Annex 14
- 11 **Inside information or significant event information—Asset backed commercial paper securitisation [deleted]**  
 Annex 15

SECN 12 is deleted in its entirety. The deleted text is not shown but the chapter is marked [deleted] as shown below.

- 12 **Format and standardised templates for making available the information and details of a securitisation [deleted]**

Amend the following as shown.

**Sch 1 Recordkeeping requirements**

...

- Sch 1.2 G It is not a complete statement of those requirements and should not be relied on as if it were.

| Handbook reference | Notifier                      | Matter to be notified  |
|--------------------|-------------------------------|--|
| ...                | ...                           | ...  |
| SECN 2.5.4R        | <i>Originator and sponsor</i> | That a <i>securitisation</i> no longer meets <i>STS criteria</i> |

|                        |                                  |   |
|------------------------|----------------------------------|---|
| <i>SECN 9.5.4R(8)</i>  | <i>Securitisation repository</i> | <p>That the information submitted to a <i>securitisation repository</i> is incomplete or inconsistent</p> <p>That the <i>securitisation repository</i> has not received written confirmation from the <i>reporting entity</i> that all required information about the <i>securitisation</i> has been provided to the <i>securitisation repository</i></p> |
| <i>SECN 9.6.9D(6)</i>  | <i>Securitisation repository</i> | <p>Any planned material changes to the applicant's information technology systems, before their implementation</p>  |
| <i>SECN 9.6.22D(3)</i> | <i>Securitisation repository</i> | <p>Any breaches in the applicant's physical and electronic security measures</p> <p>Incident report, indicating the nature and details of the incident, the measures adopted to cope with the incident and the initiatives taken to prevent similar incidents</p>   |

## Sch 2      Notification requirements

...

Sch 2.2    G    It is not a complete statement of those requirements and should not be relied on as if it were.

| <b>Handbook reference</b> | <b>Notifier</b>                  | <b>Matter to be notified</b>  |
|---------------------------|----------------------------------|---|
| ...                       | ...                              | ...   |
| <i>SECN 2.5.4R</i>        | <i>Originator and sponsor</i>    | That a <i>securitisation</i> no longer meets <i>STS</i> criteria  |
| <i>SECN 9.5.4R(8)</i>     | <i>Securitisation repository</i> | <p>That the information submitted to a <i>securitisation repository</i> is incomplete or inconsistent</p> <p>That the <i>securitisation repository</i> has not received written confirmation from the <i>reporting entity</i> that all required information about the <i>securitisation</i> has been provided to the <i>securitisation repository</i></p> |
| <i>SECN 9.6.9D(6)</i>     | <i>Securitisation repository</i> | <p>Any planned material changes to the applicant's information technology systems, before their implementation</p>  |

|                        |                                  |   |
|------------------------|----------------------------------|---|
| <i>SECN 9.6.22D(3)</i> | <i>Securitisation repository</i> | <p><del>Any breaches in the applicant's physical and electronic security measures</del></p> <p><del>Incident report, indicating the nature and details of the incident, the measures adopted to cope with the incident and the initiatives taken to prevent similar incidents</del></p> |
|------------------------|----------------------------------|---|

### **Sch 3      Fees and other requirement payments payment requirements**

...

Sch 3.2    G    ~~The provisions relating to fees payable in respect of *securitisation repositories* are set out in *FEES 3.2.7R* (Table of application, notification, vetting and other fees payable to the FCA), *FEES 3 Annex 13R* (Fees payable for registration as a credit rating agency, trade repository or securitisation repository), *FEES 4.2.11R* (Table of periodic fees payable to the FCA) and *FEES 4 Annex 16R* (Periodic fees for credit rating agencies, trade repositories and securitisation repositories). [deleted]~~

...

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