Rating Report
CaixaBank PYMES 13, FT

DBRS Morningstar
November 2023

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Credit Ratings, Issuer's Assets, and Liabilities

Debt	Par Amount (EUR)	Initial Credit Enhancement (%)	Investor Coupon (p.a.)	Credit Rating Action Date	DBRS Morningstar Credit Rating	Credit Rating Action
Series A Notes ES0305750004	2,610,000,000	18.0	Fixed Rate of 2.50%	15 November 2023	AA (sf)	Provisional Rating – Finalised
Series B Notes ES0305750012	390,000,000	5.0	Fixed Rate of 2.75%	15 November 2023	BB (sf)	Provisional Rating – Finalised

Kingdom of Spain Sovereign Credit Rating:	"A", Stable trend
Closing Date:	17 November 2023

Transaction Summary

CaixaBank PYMES 13, FT (CB PYMES 13 or the Issuer; a special-purpose vehicle (SPV)) is a cash flow securitisation collateralised by a portfolio of unsecured loans originated by CaixaBank, S.A. (CaixaBank or the Originator) to small and medium-size enterprises (SMEs) and self-employed individuals (37,713 obligor groups) totalling EUR 3.5 billion. At the issue date, the Originator selected the final portfolio of EUR 3.0 billion from the provisional portfolio.

The transaction is static and consists of Series A and Series B notes paying a fixed-rate coupon while the portfolio of loans pays a mix of floating and fixed rates. The transaction benefits from a cash reserve totaling EUR 150.0 million (equivalent to 5.0% of the initial balance of the notes) available to cover interest and principal shortfalls.

The credit rating on the Series A Notes addresses the timely payment of interest and the ultimate payment of principal on or before the legal final maturity date in April 2047. The credit rating on the Series B Notes addresses the ultimate payment of interest and the ultimate payment of principal on or before the legal final maturity date in April 2047. For additional information on the meaning and scope of the financial obligations identified in these credit ratings, please see the section Scope and Meaning of Financial Obligations.

Transaction Parties

Type	Name	Current Rating (Long-Term/Short-Term)
Issuer	CaixaBank PYMES 13, FT	n/a
Originator/Seller/Servicer	CaixaBank, S.A.	"A"/R-1 (low)
Account Bank/Paying Agent	CaixaBank, S.A.	"A"/R-1 (low)
Reserve Fund Account Bank	CaixaBank, S.A.	"A"/R-1 (low)
Transaction/Fund Manager	CaixaBank Titulización, S.G.F.T., S.A.U.	n/a
Arrangers	CaixaBank, S.A. CaixaBank Titulización, S.G.F.T., S.A.U.	"A"/R-1 (low) n/a

Relevant Dates

Type	Date
Issue Date	14 November 2023
DBRS Morningstar Initial Rating Date	7 November 2023
First Interest Payment Date	18 April 2024
Payment Frequency	Quarterly, on the 18th day of January, April, July, and October
Call Date	When the asset balance is less than 10.0% of the original portfolio
Early Amortisation Date	n/a
Legal Final Maturity Date	18 April 2047

Credit Rating Rationale

The credit ratings are based on DBRS Ratings GmbH's (DBRS Morningstar) review of the following analytical considerations:

- The transaction’s capital structure and the form and sufficiency of available credit enhancement.
- Relevant credit enhancement in the form of subordination, reserve fund, and excess spread.
- The ability of the transaction to withstand stressed cash flow assumptions and repay the Issuer’s financial obligations according to the terms under which the notes are expected to be issued.
- The originator’s capabilities with respect to origination, underwriting, servicing, and financial strength.
- The credit quality of the collateral and the ability of the servicer to perform collection activities on the collateral.
- The structure of the priority of payments.
- The legal structure and the presence of legal opinions addressing the assignment of the assets to the Issuer and the consistency with DBRS Morningstar’s *Legal Criteria for European Structured Finance Transactions* methodology.

Strengths

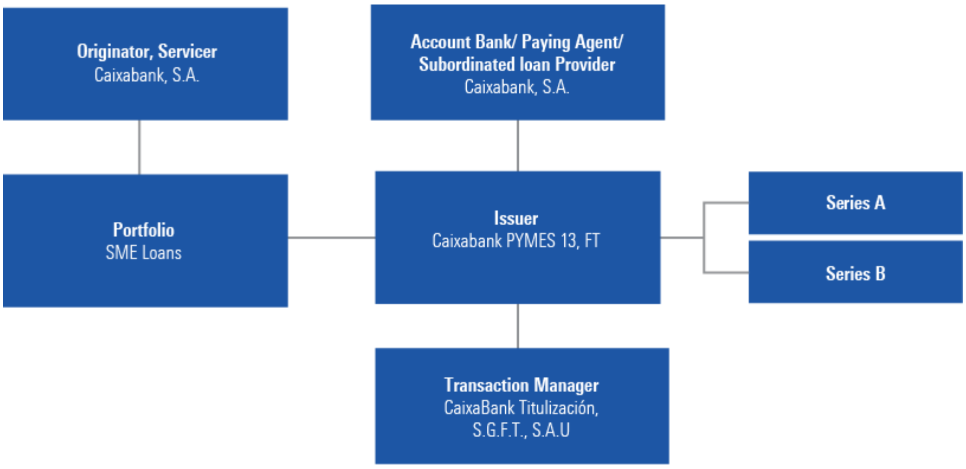
- **The EUR 150.0 Million Reserve Fund:** The reserve fund corresponds to 5.0% of the balance of notes of the portfolio and is available as additional credit enhancement for the notes.
- **The Structure of the Priority of Payments:** This ensures that the Series A Notes’ principal benefits from any available excess cash to cure any shortfalls before the distribution of any proceeds to the more junior notes.
- **Relatively Low Industry Concentration:** The portfolio's top three industries as per DBRS Morningstar’s industry definition are Consumer Packaged Goods, Business Services, and Real Estate, which represent 22.45%, 9.08%, and 6.81%, respectively. Although there is a significant difference between the top one and top two industries, DBRS Morningstar considered that the concentration is not representative.

- **Low Borrower Concentration:** The largest exposure of the borrower group in the provisional pool is 0.66% of the portfolio's aggregate principal balance. The top 10 and top 20 largest borrower groups represent 3.57% and 5.42% of the provisional portfolio balance, respectively.
- **Portfolio Credit Quality:** The portfolio selected for this transaction benefitted from better credit quality than the overall CaixaBank loan book as evidenced by the lower probability of default (PD) of the assets in the portfolio when compared with the PD distributions of the overall loan book as per CaixaBank internal models.

Challenges and Mitigating Factors

- **Relatively High Regional Concentration:** Catalonia represents 24.59% of the portfolio balance with Andalusia (13.97%) and Valencian Community (12.95%) completing the top three largest regions.
  Mitigant: The high exposure of the portfolio to Catalonia reflects the originator's strong market share in this region, which is also captured by the historical performance data.
- **The Reliance on CaixaBank to Perform Most of the Relevant Ancillary Roles in the Transaction:** CaixaBank originated the loans and will act as the servicer and financial agent where all of the Issuer's bank accounts (including collections and reserve fund cash) will be held.
  Mitigant: DBRS Morningstar maintains public credit ratings, private credit ratings, or internal assessments to evaluate and monitor the potential risk that counterparties pose to the performance of the notes in their roles. In addition, the transaction agreements foresee specific remedial actions for each counterparty role once the DBRS Morningstar credit ratings fall below certain levels.
- **Interest Rate Risk:** There is a mismatch between the interest due on the notes, which is at a fixed rate, and the interest earned on the portfolio, which is a mix of floating and fixed rates. Approximately 55% of the portfolio references a floating interest rate. The Issuer does not include any hedging agreements to mitigate the aforementioned interest rate risk in the transaction.
  Mitigant: DBRS Morningstar's cash flow analysis includes scenarios where interest rates fall further from current levels. Scenarios where the interest rates rise are beneficial for the transaction.
- **The Servicer's Ability to Modify Some of the Original Characteristics of the Loan Agreements:** This could increase the risk profile, the interest rate risk, and the weighted-average life (WAL) of the portfolio.
  Mitigant: The servicer flexibility is common in balance sheet securitisations, and transaction documents include limits for the variations. DBRS Morningstar has assumed a stress portfolio allowed by the servicer's permitted variations.
- **Loan Repurchase Optionality:** The seller is allowed to repurchase defaulted and doubtful (previous to default classification) receivables from the fund at market value which can be significantly below par.
  Mitigant: Repurchase options are a common possibility; however, the option to repurchase pre-defaulted loans at least at market price is not a common feature. DBRS Morningstar stressed its recovery assumptions to account for the mentioned option.

Transaction Structure



Source: DBRS Morningstar.

Transaction and Counterparty Overview

DBRS Morningstar evaluates the potential credit impact on its credit ratings based on the performance of counterparties that issuers face in the capacity of derivative counterparties, account banks, custodians, or other roles. To minimise the impact that the failure of such counterparties would have on the DBRS Morningstar-rated debt, each counterparty is required to satisfy minimum credit rating, collateral posting, or other requirements as outlined in the publicly available current DBRS Morningstar *Legal Criteria for European Structured Finance Transactions* methodology. For this transaction, each counterparty satisfies such criteria based on DBRS Morningstar public credit ratings, private credit ratings, or private internal assessments of the creditworthiness of counterparties that do not have a DBRS Morningstar public credit rating.

Role	Counterparty	Minimum Credit Rating	Current Credit Rating
Issuer Account Bank/Paying Agent	CaixaBank, S.A.	BBB (high)	"A"/R-1 (low)/COR: AA (low)
Servicer	CaixaBank, S.A.	--	"A"/R-1 (low)/COR: AA (low)

COR = Critical Obligations Rating.

Issuer

The Issuer is an SPV created in accordance with Spanish securitisation law. Under the securitisation laws, the SPV is a separate and independent entity from the originator (Patrimonio Separado) but does not have any legal personality or capacity. The Issuer is represented by CaixaBank Titulización, S.G.F.T., S.A.U. (the management company, or Sociedad Gestora). All acts performed and all contracts, transactions, or agreements executed by the management company on behalf of the Issuer are considered, under Spanish law, to be acts performed and transactions, agreements, or contracts executed by the Issuer.

Originator and Servicer

CaixaBank will be responsible for collecting all payments due from the borrowers on the assets, managing relationships with borrowers, monitoring the performance of the credit rights, and initiating recovery processes against defaulted or nonperforming borrowers. CaixaBank will transfer all collections received from the loan portfolio to the treasury account on a daily basis.

Management Company

CaixaBank Titulización, S.G.F.T., S.A.U. acts as the management company and legal representative of the Issuer. It will be responsible for all administrative functions, including priority of payments calculations, instructing payments to and from the treasury accounts, maintaining the financial accounting of the Issuer, preparing performance reports, and providing information to regulators and credit rating agencies. The management company is also responsible for representing the noteholders' interests in the Issuer and determining whether counterparties should be replaced under certain circumstances. CaixaBank owns 100% of the management company.

Collections Account

CaixaBank will act as the collection account bank. All payments received on the loans will initially be domiciled in their collection accounts in CaixaBank. All collections of principal and interest are then transferred to the treasury account within one business day.

Account Bank, Reserve Fund Account Bank, and Paying Agent

CaixaBank will act as the account bank and will maintain the treasury account, where all the collections and reserve fund amounts will be held. DBRS Morningstar has a public Long-Term Issuer Rating on CaixaBank at "A" with a Stable trend as well as a Long Term Critical Obligations Rating (COR) of AA (low) with a Stable trend. As per the transaction documentation, in case of a withdrawal of the credit rating or a downgrade of the account bank's applicable credit rating below BBB (high), the account bank must either (1) be replaced within 60 natural days by a financial institution with a DBRS Morningstar public credit rating, private credit rating, or internal assessment of at least BBB (high); or (2) find a guarantor with a DBRS Morningstar public credit rating, private credit rating, or internal assessment of at least BBB (high). If there are any costs incurred by these options, they will be at the expense of the Issuer (CB PYMES 13). The account bank applicable rating will be the higher between (1) the senior debt rating of the bank or (2) one notch below the Long Term COR.

Origination and Servicing

DBRS Morningstar (DBRS) conducted an operational review of CaixaBank S.A.'s SME operations in October 2023 via telephone conference call. DBRS considers the origination and servicing practices of CaixaBank to be consistent with those observed among other Spanish SME lenders.

CaixaBank in its current form was established in 2011 from the reorganisation of Fundacion Bancaria Caixa d'Estalvis y Pensions de Barcelona, "la Caixa" which was founded in 1904. The banking assets and liabilities of the La Caixa group were transferred to Criteria Caixa Corp S.A., a listed investment vehicle that was subsequently converted into a bank and renamed CaixaBank. Simultaneously, various other non-banking assets of Criteria Caixa Corp were spun off to create Criteria Caixa (Criteria), a holding company wholly owned by Fundacion Bancaria La Caixa.

CaixaBank is one of the leading commercial banks in Spain that provides universal banking services to individuals, small- and medium-sized enterprises and large corporations. The Group´s operational headquarters are in Barcelona, Spain, it has a nationwide footprint and is the third largest banking group by total assets in Spain. In Portugal, CaixaBank owns the fifth largest bank by total assets, Banco BPI.

On September 3, 2020 CaixaBank announced to the market that it was in merger talks with Spanish bank Bankia, S.A. On September 17, 2020, both Banks announced a merger agreement. The agreement was approved in early December 2020 by both banks' Shareholders General Assemblies and, following the reception of approval by the relevant authorities on 26 March 2021 it was inscribed in the Spanish Companies Registry as a merger by absorption of Bankia by CaixaBank. Following the completion of the transaction CaixaBank is the largest domestic Spanish bank by total assets.

CaixaBank employs the industry standard three lines of defence model in its risk management. The first line comprises the operational team supervisors who maintain oversight of staff activities. The second line involves the monitoring through a quality assurance programme. The third line is internal audit which reports to the board, internal audit undertakes periodic reviews of key areas in accordance with a risk based plan. In April 2020 CaixaBank obtained the International Quality Assurance Certificate granted by the Institute of Internal Auditors (IIA), achieving the highest qualification in all its sections. This external review is carried out at least every 5 years and CaixaBank has held this certification since January 2015.

DBRS maintains public ratings of CaixaBank, and its Long-Term Issuer Rating of "A" was confirmed on 14 March 2023. More information on CaixaBank's ratings can be found at www. dbrsmorningstar.com

Origination & Underwriting

Origination and Sourcing

All loans are sourced through CaixaBank's network of retail branches and specialised business centres. Relationship managers liaise with clients to establish their financing requirements, collect data & documentation and input relevant information into the appropriate credit scoring system and rating model. CaixaBank offers standard business financing products that are common in the Spanish market.

Underwriting

The underwriting process starts in branch with the preparation of the application by the relationship manager for consideration by a mandated approver. Risk approval levels are based on the risk rating of the application with the only the lowest risk, lowest value applications approved at branch level. As well as risk approval, business approval is also required in terms of pricing. Approvers review the outputs from CaixaBank's internal rating models which take into consideration loan data, the behaviour of the applicant, socio-economic factors and early warning signals which may come from internal sources or credit bureaux.

CaixaBank's internal rating models are IRB approved, except for the model for self-employed non-clients where there is a lack of historical data. The models follow a standard probability of default (PD) calculation and includes rating categories (1-9). The ratings are mainly used for assessing the borrower's creditworthiness, and overall risk profile and are used as an on-going monitoring tool. For SMEs, the rating is reviewed monthly or whenever a new application is received for a loan, while large corporate ratings are reviewed annually or following a corporate reorganisation or restructure.

All models and parameters are validated by CaixaBank's internal validation department as well as by the bank's internal audit department. Most models have been approved by the central bank and are subject to on-going supervision. Models to be reviewed are selected annually by the validation department and are triggered by changes in economic cycle, policy changes and/or the model's age regardless of the predictive capacity of the model. Credit risk parameters are recalibrated annually and must be validated internally and by the European Central Bank.

Approval authority is based on the level assigned to the various approving bodies from branch level through to senior management, executive committees and the board. The approval limits also take into account the borrower type, client and loan risk profile (including expected loss) as well as the total exposure to an economic group.

CaixaBank has a pre-approval system for small and micro-enterprises. The maximum pre-approved loan for a small-enterprise is €150,000 and for a micro-enterprise it is €100,000. These loans are requested via a branch. CaixaBank is promoting the offer of a pre-approved loan brings clients into a branch to discuss their financing needs.

Summary Strengths

- No external sourcing channels for new originations.
- Largest domestic presence with high market share in terms of deposits and loans.

Servicing

The specialist loan management departments, based on the different territorial directorates and in coordination with the headquarters, are responsible for all loan management and servicing activities. Primary borrower contact is managed at the branch level through relationship managers using CaixaBank's system which also manages alerts warning of indicators of distress.

If an account falls into arrears multiple functions are involved in the recovery process at different stages as follows:

1 to 90 days past due

Branches are responsible for early stage arrears including the following activities:

- Prevention of delinquency (Alert system)
- Collection and recovery of unpaid customers within the early stages of past due.
- Proposal for restructuring debt to adjust to customers payment capability; "one client, one solution"
- Each branch has a dedicated recovery manager responsible for managing delinquency and recoveries.

In addition, there are Recovery Specialists in each Business Branch Area who support branches in managing delinquent agreements. Their role involves:

- Preventing, reducing delinquencies and track results in their area
- Tracking branch office performance
- Supporting branches with the resolution of complex cases
- Analysing outcomes to confirm that an appropriate solution has been reached
- Undertaking client negotiation

In addition, there is an external recovery management supported by recovery agencies that perform intensive management (recovery phone calls).

Beyond 91 days past due

Each Territory has its own specialized team of Delinquency and Recovery Managers whose role involves:

- Acting as the link between headquarters and the network - communicating and implementing recovery strategies.
- Comprehensive management of a client portfolio, prioritizing the reduction of doubtful accounts according to each strategy (friendly, litigation, bankruptcy, insolvency).
- Includes the management of judicial and insolvency procedures whilst continuing to try to reach amicable agreements with the aim of reaching stable solutions.
- Customer proximity, direct negotiation and taking part in the resolution of the different cases
- Retail and SMEs Specialists
- Responsible for recruiting, training and placing the recovery staff in their territory
- Taking part in the resolution of complex cases
- Reporting to headquarters and Regional Commercial Managers

There are branches specializing in recovery, with a special focus on unpaid mortgage portfolio with more than 90 days past due, including those files in court.

In addition, there is an external recovery management supported by recovery agencies and specialized servicers whose function consists of:

- Management of closed portfolios with the objective of increasing recovery agreements, best practices and scalability.
- They carry out the amicable and judicial management (except bankruptcy proceedings) of the assigned files.

CaixaBank utilises a subsidiary company CaixaBank Operational Services to support its recovery operations with solutions such as dialler-based telephony and automated issuance of text messages. CaixaBank Operational Services provides CaixaBank with flexible resource to undertake the specific management of portfolios by age of debt, product debt or outstanding balance, acting as a control layer for external agencies, with monitoring of KPIs, SLAs, and other activities in addition to everything related to Debt Collection Agencies (DCAs).

Summary Strengths

- Proactive intervention in the early stages of financial difficulties;
- Well-structured and resourced recovery management teams;
- Good use of technology to manage customer relationships throughout the loan lifecycle.

Legal Structure

Laws Affecting Transaction

The Issuer is incorporated and regulated under Spanish laws. The key Spanish securitisation law regulating this transaction is Law 5/2015 governing Asset-Backed Securitisation Funds and Securitisation Funds Managing Companies.

The securitisation laws do not include a full and complete legal framework for securitisations, and, in many respects, the legal analysis relies on general law, including laws regarding commingling, tax, transfer of assets, and risks related to the counterparties of the Issuer.

More details on the legal framework in Spain can be found in DBRS Morningstar's *Legal Criteria for European Structured Finance Transactions* methodology, published in June 2023.

Additionally, the changes to the Spanish insolvency law introduced by the Royal Decree Law 4/2014 imply additional risks and uncertainties that could have an adverse effect on the performance of SME collateralised loan obligation (CLO) transactions. The key risks that could affect SME CLO transactions include

- Potential extension in the asset maturities;
- Uncertainty about how voting rights will be used in the approval of restructuring plans; and
- Uncertainty about how certain loss or default triggers will be calculated following the implementation of restructuring plans, which may include changes to the debt instruments held by the SPV (such as debt conversion).

Further details on how the Royal Decree Law 4/2014 may affect SME CLO transactions can be found in the DBRS Morningstar commentary "*Spanish Insolvency Law Changes: The Good, the Bad and the Uncertain for SME CLOs*".

Current Transfer/Assignment of Receivables

In Spanish securitisations, the transfer of receivables must be made in writing, but the consent of the underlying obligor is not necessary. Neither Law 5/2015 require the formalisation of the transfer in a public deed; however, the transfer of receivables through the ordinary transfer of nonmortgage receivables is usually documented in a public deed or transfer agreement to record the date of execution for the purposes of its effect with respect to third parties and, therefore, to be recognised by regulators or insolvency officers.

In this transaction, the transfer of the assets happens on the incorporation date directly through the transfer agreement.

Asset Eligibility Criteria

The following is a selection of the representations given to the Issuer by the seller relating to the collateral. For a full list, please see the prospectus.

- All loans are duly documented and formalised, and the corresponding agreements are available to the management company.
- All loans exist and are valid and enforceable.
- All borrowers are resident in Spain.
- All loans are granted under Spanish law.
- CaixaBank rightfully holds all credit rights and there are no restrictions on their sale to the Issuer.
- CaixaBank originated all assets in its normal course of business and using its normal criteria and policies.
- All credit rights have been serviced by CaixaBank since the date of origination. Currently, all loans are serviced by CaixaBank in accordance with its current procedures.
- There are no legal claims against the credit rights that may adversely affect their validity.
- At the date of transfer, CaixaBank has no knowledge of any bankruptcy of any of the borrowers included in this portfolio.
- None of the loans have been made to employees of, or companies related to CaixaBank.
- All credit rights have a final payment date before 1 September 2043.
- None of the loans were granted to developer real estate companies to finance the construction or rehabilitation of residential or commercial properties destined for sale or rent through work certification or documents related with future payments.
- No credit rights result from the renegotiation of previous debts.
- All loans have a business purpose.
- At the incorporation date of the Issuer, the portfolio can include loans that were in arrears up to 90 days and loans that were in arrears between 31 and 90 days, up to an amount equal to 1.00% of the portfolio notional amount.

Buyback/Indemnity Mechanisms for the Breach

If it is detected that any loans have hidden defects or have breached any of the representations, the seller will agree to repair the hidden defects within 30 days following their identification or notification. If this is not possible, the seller will replace the corresponding loans with others that have similar characteristics with respect to maturity profile, interest rate, notional amount, and loan-to-value level if approved by the management company.

The seller will pay any expenses incurred with the repair or replacement of such loans. If the seller cannot replace or repair the affected loans, the management company will request that the seller buy back the affected loans, including accrued and unpaid interest, and deposit such amounts in the fund’s treasury account.

Financial Structure

Transaction Cash Flow

The servicer will collect all payments received on interest and principal (including recoveries) from the portfolio on an ongoing basis and transfer into the treasury account daily. On each payment date, the amounts available in the treasury account will be distributed in accordance with the priority of payments as summarised below.

Priority of Payments

1. Taxes and senior expenses;
2. Interest on the Series A Notes;
3. Principal on the Series A Notes;
4. Top up reserve fund to the required level while Series A Notes are outstanding;
5. Interest on the Series B Notes;
6. Principal on the Series B Notes;
7. Top up reserve fund to the required level once the Series A Notes have been paid down and while the Series B Notes are outstanding;
8. Interest on the subordinated loan for initial expenses;
9. Principal of the subordinated loan for initial expenses;
10. Interest on the subordinated loan for reserve fund;
11. Principal of the subordinated loan for reserve fund;
12. Servicer fees; and
13. Excess to equity.

Note Redemption Rules

- The notes amortise following the theoretical amortisation concept, which is calculated as the amount that will make outstanding balance of liabilities equal to the outstanding balance of performing loans.
- The Series A Notes will start amortising on the first payment date in April 2024.
- The Series B Notes will amortise once the Series A Notes have been fully redeemed.

Early Liquidation Events

- Once the outstanding balance of the assets is less than 10.0% of the initial balance and the proceeds from the sale of the assets are sufficient to pay down all notes outstanding.
- If there are circumstances that permanently affect the SPV's financial stability.
- If the management company is declared bankrupt and a substitute is not appointed within four months.
- In case of a nonpayment indicating a serious and permanent imbalance that affects the transaction.
- The first payment date following 36 months from the amortisation of the last loan in the portfolio.

Liquidation Priority of Payments

1. Reserve to pay the liquidation expenses of the fund;
2. Taxes and expenses;
3. Interest on the Series A Notes;
4. Principal on the Series A Notes;
5. Interest on the Series B Notes;
6. Principal on the Series B Notes;
7. Interest on the subordinated loan for initial expenses;
8. Principal of the subordinated loan for initial expenses;
9. Interest on the subordinated loan for reserve fund;
10. Principal of the subordinated loan for reserve fund;
11. Servicer fees; and
12. Excess to equity.

Payment Timing

Interest due on the notes for each subsequent period is determined two days before the applicable payment date. The transaction pays interest and principal on a monthly basis on the 18th of January, April, July, and October. The notes will pay a fixed interest rate; Series A will pay 2.50% and Series B will pay 2.75%.

Security

Receivables

The portfolio consists of unsecured loans granted by CaixaBank to SMEs and self-employed individuals in Spain.

Servicer Agreement

CaixaBank will act as the servicer of the portfolio of the unsecured loans. The servicer will employ standard due diligence to ensure that the payments are collected in accordance with the terms and contractual conditions of the loans.

Servicing Mechanism

The servicer is expected to monitor and manage the credit rights sold to the Issuer with the same care and diligence as it does with its own loans. The servicer will be responsible for collecting all payments due from the borrowers on the credit rights, managing relationships with borrowers, monitoring the performance of the loans, and initiating recovery procedures against defaulted or nonperforming borrowers.

The servicer is allowed to negotiate changes to existing loans within the permitted variations foreseen in the servicing agreement. The permitted variations are mainly limited to changes in the interest rate, maturity of the loans, and debt forgiveness.

Commingling Risk

The servicer will pay all amounts received from loans within one business day of being collected to the Issuer's treasury account opened with the account bank (CaixaBank). DBRS Morningstar considers that the Issuer has significant exposure to CaixaBank. Nevertheless, DBRS Morningstar is comforted by CaixaBank's credit ratings of "A" and R-1 (low) and by its Long Term COR of AA (low) and its Short Term COR of R-1 (middle), all with Stable trends.

The transaction agreements do not incorporate any credit rating trigger to mitigate the risk of a servicer default. As such, DBRS Morningstar has stressed the cash flows received, according to the *Legal Criteria for European Structured Finance Transactions* established for non-investment-grade servicers.

Servicer Termination

The servicer agreement can be terminated under certain conditions by the management company. The primary reasons for which a servicer could be terminated include a breach of the obligations of the servicer under the servicer agreement, the insolvency or bankruptcy of the servicer, or the servicer ceases to have necessary authorisation by the Bank of Spain to provide such services. In cases where a servicer agreement is terminated, the management company will appoint a replacement servicer.

The servicer agreement can also be voluntarily terminated by the servicer only when the servicer has proposed a new replacement servicer, which does not add additional costs to the Issuer and does not negatively affect the credit ratings of the notes. Any event of servicer replacement needs to be communicated to the Comisión Nacional del Mercado de Valores, the Spanish financial securities markets regulator, and to the credit rating agencies.

Credit Enhancement

The Series A Notes benefit from credit enhancement in the form of the excess of the balance of the portfolio above the notional amount of the outstanding balance of the Series A Notes. Additionally, credit enhancement is provided by the reserve fund. The transaction also benefits from excess spread that can be used to replenish the reserve fund in the case of defaults of the loans.

Reserve Fund

As of the closing date, the balance in the reserve fund was EUR 150.0 million, equivalent to 5.0% of the notes. The reserve fund is available to cover senior expenses as well as missed interest and principal payments on the Series A and Series B Notes once the Series A Notes have paid in full. The reserve fund balance must be maintained at the minimum level, defined as 5.0% of the outstanding balance of the Series A and Series B Notes. However, no reduction of the required reserve fund level will be allowed (1) in the first 12 months, or (2) if the reserve fund was not funded to the minimum level on the previous payment date.

Interest Rate Risk

The Issuer has not entered into any interest rate hedging agreements and is therefore exposed to interest rate risk and potential liquidity risks because of the timing mismatches between payments on the notes (quarterly) and payments collected on the asset portfolio (a mixture of monthly, quarterly, semiannual, and annual paying loans).

As of the provisional portfolio date, 25 September 2023, the floating portion of the portfolio was 55.1%.

The transaction is vulnerable to future movement in Euribor rates given that the representative percentage of the portfolio pays a floating interest rate, while the notes pay fixed-rate interest. Currently the transaction benefits from a significant amount of excess spread. However, the interest generated by the pool can decrease significantly in scenarios where interest rates fall as 55.1% of the portfolio balance pays on a floating-rate basis mainly linked to Euribor indexes while the notes pay on a fixed rate.. In addition, the servicer can make interest rate type changes to loans in the portfolio (if agreed with each borrower), which may lead to further interest rate risk. This risk is partially mitigated by the liquidity provided by the Reserve Fund, which can be used to cover this potential shortfall to a certain extent.

This risk was captured in DBRS Morningstar's cash flow analysis, which tests the performance of the transaction under various interest rate scenarios.

Data Quality

CaixaBank provided historical data consistent with the DBRS Morningstar data template to support the analysis of this transaction. It also provided historical default and delinquency information organised by vintage, with information on the notional amount and number of loans. The data comprised information on standard unsecured loans and preapproved loans granted to self-employed individuals and SMEs. CaixaBank also provided a separate dataset for loans classified as refinanced.

The information provided on historical loan amortisation was not consistent with the details requested by DBRS Morningstar's data template. As such, DBRS Morningstar's analysis incorporates its views on the loan amortisation based on the tenor profile of the average CaixaBank portfolio. The loan amortisation assumption is required to calculate the base-case PD under DBRS Morningstar's *Rating CLOs Backed by Loans to European SMEs* methodology.

DBRS Morningstar determined the key inputs used in its analysis based on the historical performance data provided for the originator and servicer as well as through the analysis of the current economic environment.

The sources of information used for these credit ratings comprise parties involved in the credit ratings, including but not limited to CaixaBank and the management company.

DBRS Morningstar considers the information available to it for the purposes of providing these credit ratings to be of satisfactory quality.

Collateral Analysis

		Provisional Portfolio (as of 25 September 2023)
Asset Type (% of portfolio notional)	Loans	100.0%
Unsecured Loans		100.0%
Standard/Preapproved Loans (% of portfolio notional)	Standard	96.6%
	Preapproved	3.4%
Borrower Type (% of portfolio notional)	Small Companies	28.7%
	Micro Companies	28.4%
	Medium-Size Companies	24.3%
	Self-Employed Individuals	18.5%
Portfolio Balance (EUR million)	Performing	99.8%
	Principal overdue (<90 days in arrears)	0.2%
Number of Loans	Total	41,979
Number of Borrower Groups		37,713
Floating/Fixed (% of portfolio notional)	Floating	55.1%
	Fixed	44.9%
Average Loan Size (EUR)		83,475
Average Borrower Exposure (EUR)		92,917
Weighted-Average Floating Spread (p.a.)		1.3%
Weighted-Average Fixed Interest Rate (p.a.)		3.0%
Weighted-Average Maturity		6.2 years
Weighted-Average Life		3.3 years
Obligor Group Concentration (% of portfolio notional amount)	Largest	0.7%
	Top 10 Largest	3.5%
	Top 20 Largest	5.4%
Credit Rights Origination Dates		2016-2023
Delinquency (% of portfolio notional amount)	Loans in Arrears (1 to 30 days)	0.14%
	Loans in Arrears (31 to 90 days)	0.04%

Note: The above figures are based on the provisional portfolio.
Sources: CaixaBank, DBRS Morningstar.

Portfolio Distribution—Largest Exposures

The securitised portfolio is very granular, with no borrower group representing more than 0.7% of the portfolio balance, which is according to the transaction documents. The top 10 and top 20 borrower groups represent 3.5% and 5.4% of the portfolio outstanding balance, respectively.

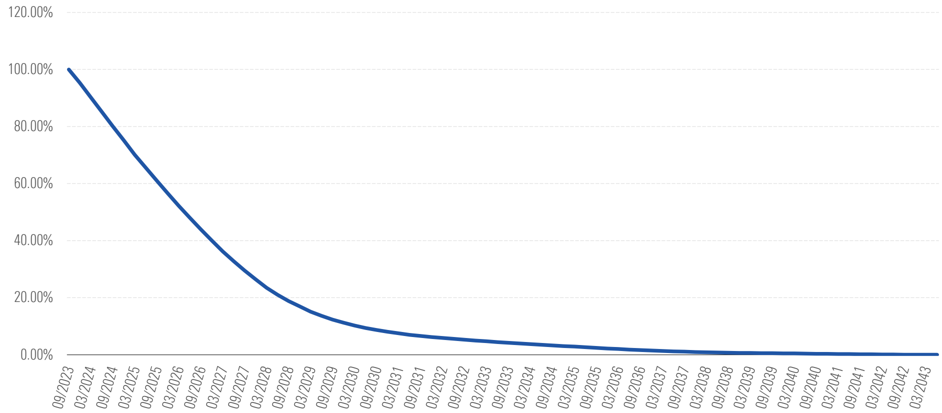
Rank	Balance (EUR)	Percentage of Portfolio	Region	Industry
1	23.000.000	0.7%	Catalonia	Real Estate
2	18.430.277	0.5%	Valencian Region	Consumer Packaged Goods
3	15.822.774	0.4%	Catalonia	Travel & Leisure
4	13.000.000	0.4%	Canary Islands	Real Estate
5	11.350.000	0.3%	Andalusia	Diversified Financial Services
6	10.000.000	0.3%	Valencian Region	Waste Management
7	9.150.000	0.3%	Madrid	Diversified Financial Services
8	8.374.531	0.2%	Canary Islands	Business Services
9	8.000.000	0.2%	Catalonia	Education
10	8.000.000	0.2%	Castille La Mancha	Consumer Packaged Goods
Total	125,127,582	3.5%		

Sources: CaixaBank, DBRS Morningstar.

Amortisation Profile

The provisional portfolio used for the analysis had a WAL of 3.3 years; for the purpose of the analysis, DBRS Morningstar assumed the mentioned 3.3 years. The Series A Notes are expected to begin amortising from the first payment date, given the scheduled amortisation profile (assuming a 0% constant prepayment rate) of the underlying loans (see Exhibit 1).

Exhibit 1 Amortisation Profile (0% CPR)



Source: DBRS Morningstar.

Portfolio Distribution—Borrower Industry Sector Classification

The portfolio is relatively well diversified across industries grouped by DBRS Morningstar industry classification. The top industry exposure is to Consumer Packaged Goods, which represents approximately 22.4% of the portfolio balance. The rest of the sectors are very well diversified; the second and third most representative industries are Business Services and Real Estate, which represent 9.1% and 6.8% of the portfolio, respectively.

Exhibit 2 Portfolio Distribution—Industry Concentration

DBRS Morningstar Industry (as of the Closing Date)	Percentage of Balance
Consumer Packaged Goods	22.4%
Business Services	9.1%
Real Estate	6.8%
Retail—Defensive	5.4%
Travel & Leisure	4.8%
Transportation	4.6%
Homebuilding & Construction	3.9%
Restaurants	3.8%
Retail—Cyclical	3.7%
Healthcare Providers & Services	3.6%
Industrial Products	3.4%
Industrial Distribution	3.3%
Agriculture	2.3%
Vehicles & Parts	2.1%
Diversified Financial Services	2.0%
Personal Services	1.7%
Chemicals	1.6%
Media—Diversified	1.6%

DBRS Morningstar Industry (as of the Closing Date)	Percentage of Balance
Manufacturing- Apparel & Accessories	1.3%
Waste Management	1.2%
Packaging & Containers	1.2%
Education	1.2%
Furnishings, Fixtures, & Appliance	0.9%
Software	0.9%
Building Materials	0.8%
Forest Products	0.8%
Utilities—Regulated	0.7%
Hardware	0.6%
Metals & Mining	0.6%
Drug Manufacturers	0.6%
Beverages—Alcoholic	0.6%
Construction	0.5%
Rest of the Industries	1.8%
Total	**100.0%**

Note: Because of rounding, the items in the columns might not add up to the stated totals.
Sources: CaixaBank, DBRS Morningstar.

Exhibit 3 Portfolio Distribution—Borrower Location by Region

Regional Classification (as of the Closing Date)	Percentage of Balance
Catalonia	24.6%
Andalusia	14.0%
Valencian Region	12.9%
Madrid	10.6%
Canary Islands	4.5%
Basque Country	4.4%
Galicia	4.2%
Castille-Leon	3.9%
Castille La Mancha	3.7%
Murcia Region	3.5%
Balearic Islands	3.4%
Navarre	3.3%
Aragon	2.8%
Extremadura	2.0%
La Rioja	1.0%
Cantabria	0.6%
Asturias	0.6%
Ceuta	0.1%
Melilla	0.0%
Total	**100.0%**

Note: Because of rounding, the items in the column might not add up to the stated totals.
Sources: CaixaBank, DBRS Morningstar.

DBRS Morningstar Analysis

Asset Analysis

DBRS Morningstar used its SME Diversity Model to determine a lifetime default rate at the required credit rating levels. The SME Diversity Model takes key loan-by-loan information of the securitised portfolio (such as borrower identification (ID), borrower notional amount, industry ID, and amortisation type for each loan); the expected WAL of the portfolio, which is calculated by creating a loan-by-loan amortisation schedule of the portfolio; and the annualised PD assumption estimated by DBRS Morningstar based on the historical data provided and internal PD distribution. The SME Diversity Model employs a Monte Carlo simulation to determine cumulative default rates (or hurdle rates) at each credit rating stress level.

Breakeven default rates (BDRs) on the notes were determined using the DBRS Morningstar collateralised debt obligation (CDO) cash flow tool. The minimum BDR is computed over nine combinations of default timing and interest rate stresses. At the AA (sf) and BB (sf) credit rating levels, the BDRs for the average of the nine scenarios must exceed the respective hurdle rate calculated by the SME Diversity Model.

Average Annualised Default Rate

The average annualised default rate is determined from the historical data supplied by the originator. CaixaBank supplied historical default data divided into standard unsecured loans granted to SMEs and self-employed borrowers, and preapproved unsecured loans granted to SMEs and self-employed borrowers.

The average annualised default rate is determined from the historical data supplied by the originator. CaixaBank supplied historical default data into standard unsecured loans granted to SMEs and self-employed borrowers, and preapproved unsecured loans granted to SMEs self-employed borrowers. The annual base-case PDs from the historical data are 3.19% for unsecured SME loans and 2.49% for preapproved SME loans, with a weighted-average default rate of 3.17%, based on the performance data provided by CaixaBank from the past six years.

The PD derived from the historical data provided a base case upon which risk adjustments were applied. An adjustment to account for the positive selection evidenced in the portfolio was applied (see the Positive Selection Analysis section below).

Positive Selection Analysis

When justified, DBRS Morningstar analyses the distribution of the originator's internal credit ratings assigned to each loan in the provisional pool and compares them with those in the overall corresponding loan book of the originator. This analysis helps DBRS Morningstar to determine if the quality of the loans selected for the transaction is of similar average quality as those in the loan book.

This is important because the historical performance data provided is normally based on the performance of the originator loan book. CaixaBank employs one of several internal credit rating models to assess the risk of each obligor. The choice of model depends on the client type (i.e., SME, corporate, self-employed, etc.) as well as on client size and industry. The portfolio selected for this transaction benefitted from better credit quality than the overall CaixaBank loan book as evidenced by the lower PDs of the assets in the portfolio when compared with the PD distributions of the overall loan book as per CaixaBank internal models. Based on this evidence, DBRS Morningstar adjusted the base-case PDs to take the negative and positive selections into consideration, resulting in an annual base-case PD of 1.57% for unsecured standard loans and 2.49% for preapproved SME loans, as no additional information was provided for this portfolio bucket. The weighted-average PD of the total portfolio is 1.60%

Granularity Default Risk

Borrower concentration is taken into account in the DBRS Morningstar SME Diversity Model. In exceptional cases, DBRS Morningstar may need to conduct additional analysis to ensure that the risk associated with specific borrowers is accounted for appropriately. DBRS Morningstar determined that there were no borrowers requiring additional analysis in the portfolio for this transaction.

Correlation

DBRS Morningstar employs a two-factor correlation model as the basis for the SME default analysis. This correlation structure is implemented in the DBRS Morningstar SME Diversity Model, allowing for explicit concentration in obligor and industries while using a Monte Carlo process to generate the stressed default rates. To account for the increased concentration risk inherent in SME pools because of obligor and industry, DBRS Morningstar applies a credit rating level-based correlation stress using the DBRS Morningstar SME Diversity Model.

Recovery Rates and Recovery Delay

For assets that are unsecured or secured by collateral other than real estate, DBRS Morningstar applies recoveries for the applicable proposed credit rating and country tier in line with its *Global Methodology for Rating CLOs and Corporate CDOs*.

For assets secured by residential or commercial real estate, market value decline (MVD) assumptions are applied to the collateral value with the resulting stressed value available for loan repayment. For residential collateral, MVDs and indexation are based on regional distribution. For commercial collateral, DBRS Morningstar applies different MVDs depending on whether the valuation is indexed or if it is applied to an updated valuation. In the case of multiple loans or liens, DBRS Morningstar considers all available data and computes the appropriate recovery. The resulting recovery rate is floored at the senior unsecured recovery rate for the applicable proposed credit rating. The MVD assumptions for assets secured by residential real estate can be found in DBRS Morningstar’s *European RMBS Insight Methodology* and *European RMBS Insight: Spanish Addendum* methodologies. MVD assumptions for assets secured by commercial real estate are based on residential real estate MVDs with additional stress applied. Commercial MVDs are assumed using a peak-to-trough approach and, therefore, DBRS Morningstar accounts for situations where prices have corrected significantly from the peak by indexing property values to account for relevant price movements. DBRS Morningstar MVDs for commercial real estate are incorporated in DBRS Morningstar's *Rating CLOs Backed by Loans to European SMEs* methodology.

The CaixaBank provisional portfolio as of 25 September 2023 comprises unsecured loans only.

Recovery timing is assumed to vary according to the domicile of the obligor. In general, recovery delay assumptions have been determined by examining the average time to resolve insolvencies as well as the legal framework regarding relative debtor-/creditor-friendliness in a particular jurisdiction. For Spain, DBRS Morningstar assumes a recovery delay of 2.25 years for unsecured loans.

Please refer to DBRS Morningstar's *Global Methodology for Rating CLOs and Corporate CDOs* for country tiers and recovery delays for commercial real estate and unsecured recoveries.

Collateral Seniority (DBRS Morningstar Definition)	Collateral Type (DBRS Morningstar Definition)	Percentage of Provisional Portfolio
Unsecured	Unsecured	100.0%

CaixaBank, as seller, has the option to repurchase defaulted and doubtful receivables, at least at market price as agreed between CaixaBank and the management company, without portfolio limitation.

Bases on information provided by CaixaBank about repurchases from other CaixaBank PYMES transactions, the percentage of doubtful loans repurchased is very low; however, the price is under the unsecured recovery rate expectations by methodology. Therefore, DBRS Morningstar applied a fixed recovery rate of 10.0% to a small percentage of the portfolio to capture this uncertain risk.

A summary of the recovery rates and recovery delay assumptions used for this transaction is shown in the table below.

Parameters	Values (at AA (sf) Rating Stress)	Values (at BB (sf) Rating Stress)
Weighted-Average Unsecured Recovery Rate	20.4%	26.0%
Unsecured Recovery Delay for Spain	2.25 years	2.25 years

Overall Rating Parameter Inputs for the DBRS Morningstar Diversity Model

The inputs used to calculate the portfolio default rates are:

Parameters	Values (at AA (sf) Rating Stress)	Values (at BB (sf) Rating Stress)
Weighted-Average Life of SME Portfolio (years)	3.27	3.27
Assumed One-Year Default Rate	Standard loans: 1.57% Pre-approved loans: 2.49%	Standard loans: 1.57% Pre-approved loans: 2.49%
Inter-Industry Correlation	9.75%	5.12%
Intra-Industry Correlation	24.38%	12.81%

The WAL of the pool was 3.27 years. DBRS Morningstar did not apply additional stresses. The expected portfolio lifetime total default rates for the respective credit ratings (based on the inputs described in the table above) are indicated below:

Credit Ratings	Lifetime Total Default Rate
AA (sf)	23.20%
BB (sf)	9.43%

Interest Rate Scenarios

The purpose of the interest rate stress scenarios is to determine whether the transaction has any systemic interest rate risk exposure, such as having all floating-rate liabilities and at least some fixed-rate assets without an adequate hedge. DBRS Morningstar uses its cash flow tool to test the impact on the notes' BDRs for three interest rate scenarios: a forward interest rate curve, stressed increasing interest rate scenarios, and stressed decreasing interest rate scenarios.

The higher the respective credit rating, the more extreme the level of interest rate stress that is used. For example, the interest rates assumed under the increasing interest rate stress scenario are higher for a credit rating of AA (sf) than for a credit rating of BB (sf). The interest rate stresses are discussed in DBRS Morningstar's *Interest Rate Stresses for European Structured Finance Transactions* methodology, published in September 2023.

Default Timing Vectors Scenarios

In addition to the interest rate scenarios, DBRS Morningstar also varies the timing of when the defaults occur. There are three scenarios used for all credit ratings:

Default Vector	Year 1	Year 2	Year 3	Year 4
Front	40%	30%	20%	10%
Back	20%	30%	40%	10%
Smooth	30%	30%	30%	10%

Overall Cash Flow Summary

The lifetime total default rate is the cumulative default rate (or hurdle rate) that the transaction must survive if the specified notes are assigned the credit rating in question, under the nine interest rate and default timing vector scenarios described above.

Specifically, to pass the AA (sf) credit rating level, the Series A Notes must not suffer any losses for the average of the nine scenarios tested. In addition, the payment type of interest on a timely basis (as is the case for the senior notes) is taken into account.

Cash Flow Results

Factor/Result	Series A Notes	Series B Notes
Rating Stress	AA (sf)	BB (sf)
Expected Lifetime Default Rate (at relevant rating stress)	23.20%	9.43%
Average Cash Flow BDR	26.63%	10.87%
Cushion	3.43%	1.44%

The results of the cash flow analysis indicate the following:

- The average BDRs for the Series A Notes are higher than the AA (sf) stress lifetime default rate, supporting the decision to assign a AA (sf) credit rating to the Series A Notes.
- The average BDRs for the Series B Notes are higher than the BB (sf) stress lifetime default rate, supporting the decision to assign a BB (sf) credit rating to the Series B Notes.

Sensitivity Analysis

The sensitivity analysis conducted highlights the likely impact on the credit ratings when one key risk parameter is stressed while holding all other parameters constant. In addition, the sensitivity analysis also demonstrates the impact on the credit ratings where two risk parameter stresses are combined.

DBRS Morningstar considered the following stress scenarios compared with the parameters used to determine the credit ratings (the base case):

- **PD Rates:** Base-case PD of 1.57% for standard unsecured loans and 2.49% for preapproved loans; a 10.0% increase of the base case and a 20.0% increase of the base-case PD.
- **Recovery Rates:** Base-case recovery rate, a 10.0% and 20.0% decrease in the base-case recovery rates at each credit rating level.

Series A Notes—Rating Sensitivity to Changes in Key Risk Parameters

	Relative Changes to PD		
Relative Changes to Recoveries	**Original (Base Case)**	**+10%**	**+20%**
Original (Base Case)	AA (sf)	AA (sf)	AA (sf)
-10%	AA (sf)	AA (sf)	AA (sf)
-20%	AA (sf)	AA (sf)	AA (sf)

Series B Notes—Rating Sensitivity to Changes in Key Risk Parameters

	Relative Changes to PD		
Relative Changes to Recoveries	**Original (Base Case)**	**+10%**	**+20%**
Original (Base Case)	BB (sf)	BB (sf)	BB (low) (sf)
-10%	BB (sf)	BB (sf)	BB (low) (sf)
-20%	BB (sf)	BB (sf)	BB (low) (sf)

Assessment of the Sovereign Credit Rating

At the issue date, the Kingdom of Spain's Long-Term Foreign and Local Currency Issuer Ratings were "A" with Stable trends. The Stable trends reflect DBRS Morningstar's assessment that the risks to the credit ratings remain broadly balanced.

For more information, please refer to DBRS Morningstar's most recently published press release on the Kingdom of Spain, titled *DBRS Morningstar Confirms Kingdom of Spain at "A", Stable Trend*, dated 9 June 2023.

Methodologies Applied

To assign credit ratings to this transaction, DBRS Morningstar applied the following primary methodologies, which can be found on www.dbrsmorningstar.com under Methodologies. Alternatively, please contact info@dbrsmorningstar.com or contact the primary analysts whose contact information is listed in this report.

- *Rating CLOs Backed by Loans to European SMEs* (22 October 2023) and SME Diversity Model version 2.6.1.4, https://www.dbrsmorningstar.com/research/422274/rating-clos-backed-by-loans-to-european-smes.
- *Global Methodology for Rating CLOs and Corporate CDOs* (22 October 2023), https://www.dbrsmorningstar.com/research/422269/global-methodology-for-rating-clos-and-corporate-cdos.
- *Legal Criteria for European Structured Finance Transactions* (30 June 2023), https://www.dbrsmorningstar.com/research/416730/legal-criteria-for-european-structured-finance-transactions.
- *Rating European Structured Finance Transactions Methodology* (6 October 2023), https://www.dbrsmorningstar.com/research/421599/rating-european-structured-finance-transactions-methodology.
- *Operational Risk Assessment for European Structured Finance Servicers* (15 September 2023), https://www.dbrsmorningstar.com/research/420572/operational-risk-assessment-for-european-structured-finance-servicers.
- *Operational Risk Assessment for European Structured Finance Originators* (15 September 2023), https://www.dbrsmorningstar.com/research/420573/operational-risk-assessment-for-european-structured-finance-originators.
- *Interest Rate Stresses for European Structured Finance Transactions* (15 September 2023), https://www.dbrsmorningstar.com/research/420602/interest-rate-stresses-for-european-structured-finance-transactions.

Monitoring and Surveillance

The credit ratings of the notes depend on the portfolio performance and counterparties' credit ratings. The main triggers that DBRS Morningstar will rely on for monitoring are as follows:

- Evolution of the reserve fund level;
- Updated SME default data from CaixaBank;
- Changes in the DBRS Morningstar public or private credit ratings or private internal assessments in which the counterparties engaged during the transaction as well as implementation of the remedial actions foreseen in the transaction agreements; and
- Any event of default by the Issuer.

DBRS Morningstar monitors the transaction in accordance with its *Master European Structured Finance Surveillance Methodology* (22 October 2023), which is available at www.dbrsmorningstar.com under Methodologies & Criteria. Alternatively, please contact info@dbrsmorningstar.com.

DBRS Morningstar will monitor the transaction on an ongoing basis to ensure that it continues to perform as expected. Any subsequent changes in the credit ratings will be publicly announced.

Environmental, Social, and Governance (ESG) Checklist and Considerations

ESG Factor		ESG Credit Consideration Applicable to the Credit Analysis: Y/N		Extent of the Effect on the ESG Factor on the Credit Analysis: Relevant (R) or Significant (S)*
Environmental		**Overall:**	**N**	**N**
	Emissions, Effluents, and Waste	Do the costs or risks result in a higher default risk or lower recoveries for the securitized assets?	N	N
	Carbon and GHG Costs	Do the costs or risks related to GHG emissions, and related regulations and/or ordinances result in higher default risk or lower recoveries of the securitized assets?	N	N
		Are there potential benefits of GHG-efficient assets on affordability, financeability, regulatory compliance, or future values (recoveries)?	N	N
		Carbon and GHG Costs	**N**	**N**
	Climate and Weather Risks	Are the securitized assets in regions exposed to climate change and adverse weather events affecting expected default rates, future valuations, and/or recoveries, considering key IPCC climate scenarios up to a 2°C rise in temperature by 2050?	N	N
	Passed-through Environmental credit considerations	Does this rating depend to a large extent on the creditworthiness of another rated issuer which is impacted by environmental factors (see respective ESG checklist for such issuer)?	N	N
Social		**Overall:**	**N**	**N**
	Social Impact of Products and Services	Do the securitized assets have an extraordinarily positive or negative social impact on the borrowers and/or society, and do these characteristics of these assets result in different default rates and/or recovery expectations?	N	N
		Does the business model or the underlying borrower(s) have an extraordinarily positive or negative effect on their stakeholders and/or society, and does this result in different default rates and/or recovery expectations?	N	N
		Considering changes in consumer behavior or secular social trends: does this affect the default and/or loss expectations for the securitized assets?	N	N
		Social Impact of Products and Services	**N**	**N**
	Human Capital and Human Rights	Are the originator, servicer, or underlying borrower(s) exposed to staffing risks and could this have a financial or operational effect on the structured finance issuer?	N	N
		Is there unmitigated compliance risk due to mis-selling, lending practices, or work-out procedures that could result in higher default risk and/or lower recovery expectations for the securitized assets?	N	N
		Human Capital and Human Rights	**N**	**N**
	Product Governance	Does the originator's, servicer's, or underlying borrower(s)' failure to deliver quality products and services cause damage that may result in higher default risk and/or lower recovery expectations for the securitized assets?	N	N
	Data Privacy and Security	Does the originator's, servicer's, or underlying borrower(s)' misuse or negligence in maintaining private client or stakeholder data result in financial penalties or losses to the issuer?	N	N
	Passed-through Social credit considerations	Does this rating depend to a large extent on the creditworthiness of another rated issuer which is impacted by social factors (see respective ESG checklist for such issuer)?	N	N
Governance		**Overall:**	**N**	**N**
	Corporate / Transaction Governance	Does the transaction structure affect the assessment of the credit risk posed to investors due to a lack of appropriate independence of the issuer from the originator and/or other transaction parties?	N	N
		Considering the alignment of interest between the transaction parties and noteholders: does this affect the assessment of credit risk posed to investors because the alignment of interest is inferior or superior to comparable transactions in the sector?	N	N
		Does the lack of appropriately defined mechanisms in the structure on how to deal with future events affect the assessment of credit risk posed to investors?	N	N
		Considering how the transaction structure provides for timely and appropriate performance and asset reporting: does this affect the assessment of credit risk posed to investors because it is inferior or superior to comparable transactions in the sector?	N	N
		Corporate / Transaction Governance	**N**	**N**
	Passed-through Governance credit considerations	Does this rating depend to a large extent on the creditworthiness of another rated issuer which is impacted by governance factors (see respective ESG checklist for such issuer)?	N	N
		Consolidated ESG Criteria Output:	**N**	**N**

* A Relevant Effect means that the impact of the applicable ESG risk factor has not changed the rating or rating trend on the issuer.
A Significant Effect means that the impact of the applicable ESG risk factor has changed the rating or trend on the issuer.

ESG Considerations

Environmental

There were no environmental factors that had a relevant or significant effect on the credit analysis. For more details about which environmental factors could have an effect on the credit analysis, please refer to the checklist above.

Social

There were no social factors that had a relevant or significant effect on the credit analysis. For more details about which social factors could have an effect on the credit analysis, please refer to the checklist above.

Governance

There were no governance factors that had a relevant or significant effect on the credit analysis. For more details about which governance factors could have an effect on the credit analysis, please refer to the checklist above.

The above ESG discussion relates to credit risk factors that could affect the financial profile and therefore the credit rating of the issuer. They are separate from ESG sustainability factors, which are generally outside the scope of this analysis. A description of how DBRS Morningstar considers ESG factors within the DBRS Morningstar analytical framework can be found in the *DBRS Morningstar Criteria: Approach to Environmental, Social, and Governance Risk Factors in Credit Ratings* at https://www.dbrsmorningstar.com/research/416784.

Scope and Meaning of Financial Obligations

DBRS Morningstar's credit ratings on the notes address the credit risk associated with the identified financial obligations in accordance with the relevant transaction documents. For information on the associated financial obligations, please refer to the corresponding press release published for this credit rating action.

DBRS Morningstar's credit ratings do not address non-payment risk associated with contractual payment obligations contemplated in the applicable transaction document(s) that are not financial obligations.

DBRS Morningstar's long-term credit ratings provide opinions on risk of default. DBRS Morningstar considers risk of default to be the risk that an issuer will fail to satisfy the financial obligations in accordance with the terms under which a long-term obligation has been issued.

About DBRS Morningstar
DBRS Morningstar is a full-service global credit ratings business with approximately 700 employees around the world. We're a market leader in Canada, and in multiple asset classes across the U.S. and Europe.

We rate more than 4,000 issuers and nearly 60,000 securities worldwide, providing independent credit ratings for financial institutions, corporate and sovereign entities, and structured finance products and instruments. Market innovators choose to work with us because of our agility, transparency, and tech-forward approach.

DBRS Morningstar is empowering investor success as the go-to source for independent credit ratings. And we are bringing transparency, responsiveness, and leading-edge technology to the industry.

That's why DBRS Morningstar is the next generation of credit ratings.

Learn more at dbrsmorningstar.com.

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