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METHODOLOGY

Master European Residential Mortgage-Backed Securities Rating Methodology and Jurisdictional Addenda

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Related Research

For a list of the Structured Finance related methodologies for our principal Structured Finance asset class methodologies that may be used during the rating process, please see the DBRS Global Structured Finance Related Methodologies document on www.dbrs.com. Please note that not every related methodology listed under a principal Structured Finance asset class methodology may be used to rate or monitor an individual structured finance or debt obligation.

DBRS is a full-service credit rating agency established in 1976. Spanning North America, Europe and Asia, DBRS is respected for its independent, third-party evaluations of corporate and government issues. DBRS's extensive coverage of securitizations and structured finance transactions solidifies our standing as a leading provider of comprehensive, in-depth credit analysis.

All DBRS ratings and research are available in hard-copy format and electronically on Bloomberg and at DBRS.com, our lead delivery tool for organized, web-based, up-to-the-minute information. We remain committed to continuously refining our expertise in the analysis of credit quality and are dedicated to maintaining objective and credible opinions within the global financial marketplace.

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Key Updates

For key updates in this methodology, please refer to the press release titled “DBRS Publishes Updated Irish Addendum for the Master European RMBS Rating Methodology” dated 20 December 2017.

Scope and Limitations

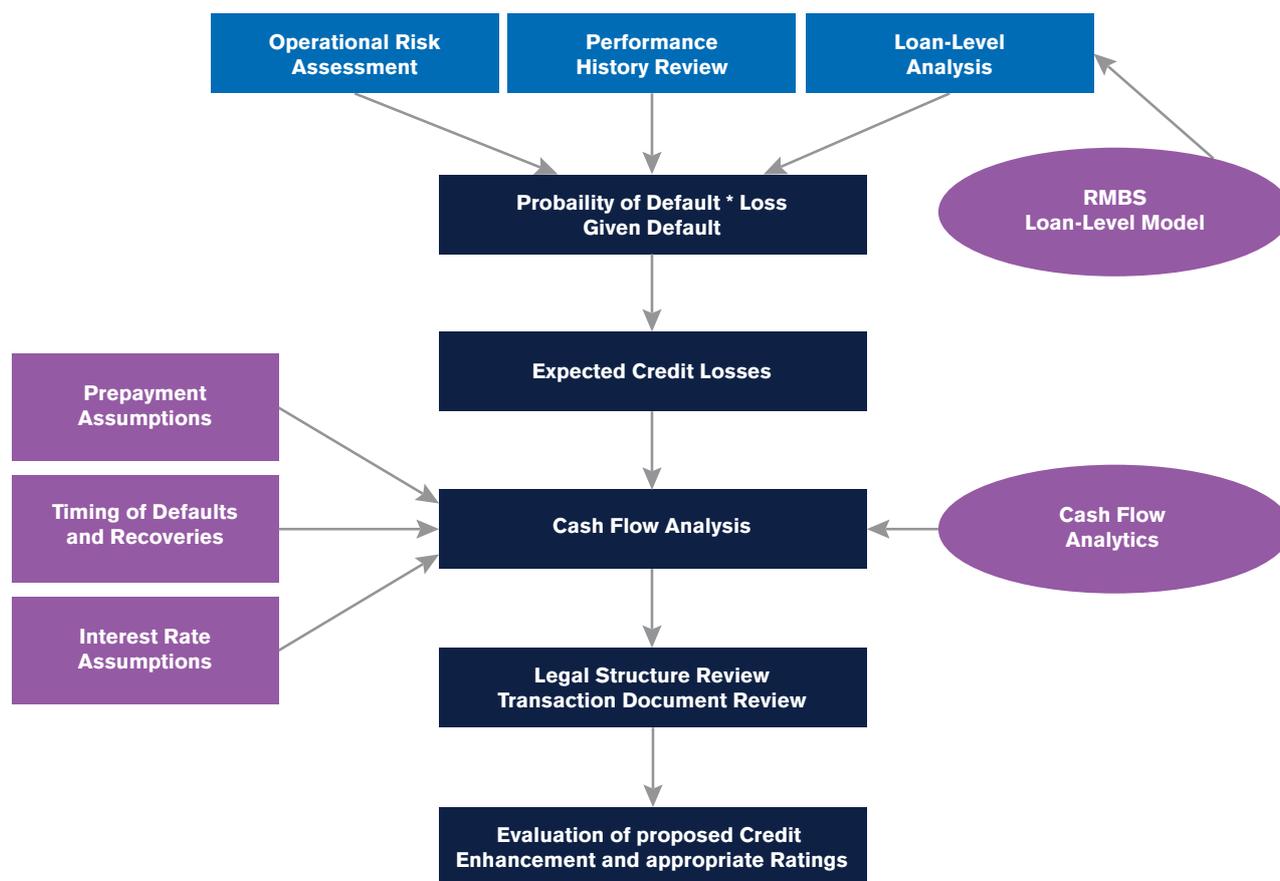
DBRS evaluates both qualitative and quantitative factors when assigning ratings to European RMBS transactions. This methodology represents the current DBRS approach for rating European RMBS transactions issued in select European markets with residential mortgage loans originated in Europe. It describes the DBRS approach to analysis, which includes (1) operational risk assessment of the originator and servicer; (2) utilisation of historical performance data and static pool data; (3) analysis of loan-level data to calculate the expected credit losses on a residential mortgage portfolio; (4) cash flow analysis; and (5) jurisdictional addenda. This report also outlines the asset class and discusses the methods DBRS typically employs when assessing a transaction and assigning a rating. It is important to note that the methods described herein may not be applicable in all cases. Further, this methodology is meant to provide guidance regarding the DBRS methods used in the sector and should not be interpreted with formulaic inflexibility, but understood in the context of the dynamic environment in which it is intended to be applied.

DBRS recognises that each European RMBS transaction may be different and that special risks/mitigating factors may lead to the modification of some of the criteria set forth in this methodology. As such, transaction ratings may materially deviate from the respective methodology from time to time. Many of the quantitative and qualitative factors that could result in a methodology material deviation are included in the following sections.

Executive Summary

This report describes the DBRS rating methodology for select European residential mortgage portfolios and forms part of the DBRS Ratings Limited (DBRS) criteria for rating European residential mortgage-backed securities (RMBS) and other transactions linked to residential mortgage assets including covered bonds. Please also refer to the appropriate jurisdictional RMBS methodologies at the end of this report for additional detail regarding DBRS asset analysis.

DBRS Rating Process for European RMBS Transactions



The diagram above summarises the process for analysing a residential mortgage-backed securities transaction:

1. DBRS assesses the operational risk by evaluating the quality of the mortgage originator and servicer.
2. DBRS reviews actual performance data of the originator and servicer with respect to historical defaults and recoveries.
3. DBRS conducts a loan-level analysis using its proprietary European RMBS Credit Model (RMBS Model), the parameters of which can vary by jurisdiction. The output from the model includes the probability of default, loss given default and expected credit losses for a residential mortgage pool. The results are then reviewed along with the results of the operational risk review and assessment of historical performance data, and are subject to adjustments, as warranted.
4. DBRS performs a cash flow analysis by incorporating stress assumptions applied to defaults, the timing of defaults and losses, prepayments and interest rates to ensure timely payment of interest and ultimate payment of principal to the holders of the rated bonds for each assigned rating.
5. DBRS reviews the legal structure of the transaction and the associated legal opinions.
6. DBRS evaluates the form and sufficiency of proposed credit enhancement.

Jurisdictional Differences

Each European jurisdiction exhibits different legal frameworks, market practices and product characteristics. The present criteria apply across all European jurisdictions, with adjustments made to reflect the specificities of each market. The generic aspects of DBRS rating approach are discussed in the first section of the report and aspects that are jurisdictionally specific are discussed in the addenda. DBRS European RMBS methodology focuses on historical performance data relevant to the jurisdiction and asset class under consideration and a loan by loan analysis of the assets in the proposed pool. With regard to DBRS analysis of the legal structure of securitisation transactions, the reader is referred to DBRS methodology *Legal Criteria for European Structured Finance Transactions*, which contains addenda addressing specific issues relevant to the principal European jurisdictions encountered by DBRS.

The different jurisdictions in Europe also exhibit varying degrees of sovereign-related risk. Here, the reader is referred to the *Rating Sovereign Governments* methodology.

Operational Risk Assessment

Overview

DBRS operational risk review is designed to evaluate the quality of the parties that originate and service the loans being securitised. In instances where DBRS believes that the originator's or servicer's quality of operations is weak, issuers may incorporate certain structural enhancements such as additional credit support, dynamic triggers or the presence of a strong backup servicer in order for DBRS to rate the transaction. In the event that DBRS determines that an originator or servicer is unable to effectively manage the assets within a specific transaction and/or there are limited mitigating factors surrounding the identified operational risks, DBRS may decline to rate the transaction.

Originator Review

The originator review process evaluates the quality of the parties that originate the loans (leases or receivables) that are about to be securitised in a transaction rated by DBRS. While DBRS does not assign formal ratings to these processes, it typically conducts operational risk reviews to assess if an originator is acceptable and incorporates the results of the review into the rating process.

DBRS typically begins the initial originator review process by sending a questionnaire to the company that outlines the topics to be covered during the discussion with management. In the event that DBRS determines that an originator's lending policy and procedures are particularly weak and that the operational risks associated with poor origination practices are not sufficiently mitigated, DBRS may refuse to rate the deal.

The originator review process typically involves a review and analysis of the following:

1. Company and management.
2. Financial condition.
3. Controls and compliance.
4. Origination and sourcing.
5. Underwriting guidelines.
6. Technology.

For details on the originator review process, please refer to DBRS's *Operational Risk Assessment for European Structured Finance Originators* methodology.

Servicer Review

The servicer review process evaluates the quality of the parties that service or may conduct backup servicing on the loans (leases or receivables) that are about to be securitised in a transaction rated by DBRS. While DBRS does not assign formal ratings to these processes, it typically conducts operational risk reviews to assess if a servicer is acceptable and incorporates the results of the review into the rating process.

DBRS typically begins the initial servicer review process by sending a questionnaire to the company that outlines the topics to be covered during the review. In instances where DBRS determines that the servicer is below average and potentially unable to meet its servicing obligations, issuers may incorporate certain structural enhancements into a proposed transaction such as additional credit support, dynamic triggers or the presence of a warm or hot backup servicer so that DBRS can rate the transaction.

The servicer review process typically involves an analysis of the following:

1. Company and management.
2. Financial condition.
3. Controls and compliance.
4. Loan/lease administration.
5. Customer service.
6. Account maintenance.
7. Default management.
 - Collections.
 - Loss mitigation.
 - Bankruptcy.
 - Fraud.
8. Investor reporting.
9. Technology.

For details on the servicing review process, please refer to DBRS's *Operational Risk Assessment for European Structured Finance Servicers* methodology.

Jurisdictional Differences

Each European jurisdiction exhibits different legal frameworks, market practices and product characteristics. The present criteria apply across all European jurisdictions, with adjustments made to reflect the specificities of each market. The generic aspects of DBRS rating approach are discussed in the first section of the report and aspects that are jurisdictionally specific are discussed in the addenda. DBRS European RMBS methodology focuses on historical performance data relevant to the jurisdiction and asset class under consideration and a loan by loan analysis of the assets in the proposed pool. With regard to DBRS analysis of the legal structure of securitisation transactions, the reader is referred to DBRS methodology *Legal Criteria for European Structured Finance Transactions*, which contains addenda addressing specific issues relevant to the principal European jurisdictions encountered by DBRS.

The different jurisdictions in Europe also exhibit varying degrees of sovereign-related risk. Here, the reader is referred to the DBRS commentary *The Effects of Sovereign Risk on Securitisations in the Euro Area*.

Data Request

As part of the rating process, DBRS analyses historical loan performance data provided by a sponsoring entity and also looks to compare the issuer's experience to the performance of the overall jurisdiction. DBRS expects issuers to provide performance information, as described below, that covers asset performance during various economic cycles to enable DBRS to evaluate the impact that macroeconomic factors, such as unemployment levels, may have on collateral performance. Where the performance history for the originator's assets is insufficient, DBRS may consider proxy data such as the performance of similarly originated assets within the same jurisdiction. In all cases where originator-specific static pool data is unavailable, however, DBRS is likely to adopt a significantly more conservative opinion regarding the assets' expected performance than would otherwise be the case. In the absence of adequate performance history, DBRS may decline to rate the transaction due to insufficiency of data.

To gain comfort on the accuracy of loan level data relative to underlying documents and data specific to each loan DBRS may seek to access Agreed upon Procedures (AuP) reports that are performed by an issuer and/or seller for regulatory purposes. In situations where DBRS requests sight of AuP reports DBRS reviews the procedures performed for the following:

- The quantity of loans reviewed.
- The confidence level.
- The nature of the tests performed.
- The results of the tests and the nature and quantity of exceptions.

DBRS may reflect these results directly in its analysis through additional or higher default probability penalties or, in certain situations, apply a rating cap or decline to rate a transaction.

Static Pool Data

DBRS loss analysis typically focuses on static pool default data. Static pool analysis relies on historical default data from discrete groups of loans originated over a relatively short period of time; ideally, these time periods should be monthly or quarterly as annual vintage data may lack the precision to accurately assess performance volatility during periods of economic stress. In addition, to the extent possible, DBRS reviews static pool arrears/default data on a gross basis, without taking into account any recoveries, for which separate static pool recovery/loss data should be provided. Presentation of data in this manner can help provide additional insight into the unique factors that impact loss and recovery performance for the collateral. By evaluating defaults and recoveries separately, DBRS can better understand the volatility drivers behind each figure and can analyse the transactions with greater accuracy.

For cases where static pool arrears/default data is unavailable, DBRS may consider using dynamic portfolio loss data as a proxy. However, this approach has several shortcomings. Firstly, portfolio figures are biased downwards during periods of portfolio growth. While it is possible to make adjustments to the data to address this phenomenon, these adjustments do not provide insight into the timing of losses, an important component of DBRS loss analysis during transaction cash flow modelling. In addition, utilising portfolio figures make it difficult to adjust for changes in asset composition, and the amount and timing of recoveries can be obscured as well. As a result, in the absence of static pool data, DBRS requests supplemental data to help refine its analysis.

Pool data should be presented such that mortgage loans are considered defaulted in a manner that is consistent with the definition of a defaulted receivable in the transaction documentation to ensure that cash flow stresses are constructed to properly address the collateral's loss profile.

In addition to default data, DBRS also requests data to validate its Loss Given Default assumptions, including loan-level information for foreclosed properties, such as the original valuation, valuation date and repossession sale price.

Pool Characteristics

When approached to rate a transaction backed by residential mortgage loans, DBRS requests that a loan by loan data template be completed. The data template captures data on the loan and borrower specific features that are described in this report.

Probability of Default

Summary

This section describes the DBRS methodology used to calculate loan-level probability of default (PD) and portfolio-level default rates for European residential mortgage pools. One important component of this methodology is an approach to calculate a base case two-year and lifetime PD estimates for individual mortgage loans. The approach also includes the creation of a portfolio default distribution, which allows for the extension to rating-specific portfolio stressed default rates. For each transaction, DBRS conducts additional analysis which serves as a reasonableness check when jurisdictional specific default penalties have yet to be validated. A summary of the methodology used to calculate loan-level PDs and portfolio default rates is given on the following page and described in detail in the following pages. Jurisdictional specific assumptions are described in each addendum.

A **benchmark two-year PD** estimate
is assigned to each loan



A **base case two-year PD** estimate
is calculated for each loan by adjusting the benchmark two-year PD
to account for individual risk characteristics
associated with each loan



A **base case lifetime PD** estimate
is calculated for each loan
by extending the base case two-year PD
to account for individual loan seasoning



A **portfolio default rate distribution**
is calculated by means of a "single factor"
model that requires the weighted average of
the base case lifetime PDs and an asset correlation estimate



Rating-specific portfolio default rates
are calculated by holding the portfolio default
distribution to a "rating standard" as implied by
the DBRS published idealised default table

The Benchmark Two-Year PD Estimate

Each loan in the mortgage portfolio is initially assigned a benchmark two-year PD. The benchmark two-year PD is determined using historical default information supplied by the originator and may be further calibrated by DBRS based on market-wide loan-level data and the related default experience in the relevant jurisdiction. The historical data used to calculate the two-year PD should cover various points within a credit cycle. If DBRS concludes data provided does not provide sufficient information as to possible asset performance in a period of stress DBRS may assign a lower rating or decline to rate a transaction.

The Base Case Two-Year PD Estimate

The benchmark two-year PD is then adjusted on a loan-by-loan basis to create the base case two-year PD estimate per loan. These adjustments are to account for borrower, property and loan product factors that increase or decrease the credit risk associated with a particular loan. An overview of the risk-adjustment factors used is provided in the next section.

As mentioned previously, DBRS conducts an operational risk review of the underwriting standards, credit policies and servicing practices of the originator and servicer. The findings from this review may result in a qualitative overlay on the estimated loan-level PDs to adjust for potential originator or servicer specific influences on loan credit performance. Further adjustments may also be necessary in the case of significant pool concentration risks.

The following section focuses on the borrower, mortgage loan and property characteristics that DBRS considers to be influential on a borrower's propensity to default. The default behaviour of each mortgage loan in the pool is forecast by integrating past credit performance information with additional characteristics that may influence a borrower's likelihood of default. Each characteristic is associated with a multiplicative factor, which may be different by jurisdiction, that adjusts the benchmark two-year PD up or down.

Borrower Characteristics and Credit Risk

Credit Risk Band and Adverse Credit History

In order to differentiate between the credit quality of borrowers, each loan is assigned by DBRS to a credit risk band, based on past credit performance information. Credit risk bands range from "A" to "E," with "A" borrowers considered to be the least risky and "E" borrowers having severe current or past credit problems and therefore considered to be the riskiest. The available information currently used to determine the credit risk band is the following:

- Previous credit impairments.
- Any prior bankruptcy or the equivalent within each jurisdiction.
- Current arrears on mortgage.

Adverse credit history is a key differentiating factor for default risk because individuals who have suffered debt problems in the past have demonstrated a higher propensity for arrears and defaults on future debt repayment. Significant previous financial difficulties are indicated by arrears or defaults on loans, County Court Judgments in the UK, Judgments in Ireland or BKR (Bureau Krediet Registratie) codes in the Netherlands or insolvency. Lending to borrowers with adverse credit history implies higher default risk compared with mainstream lending and is evidenced by significantly higher mortgage arrears and default performance compared with the prime mortgage market.

Employment and Other Income-Related Variables

Borrower propensity to default is clearly related to the ability to make timely mortgage repayments on an ongoing basis. DBRS regards affordability, income and employment characteristics as key attributes, particularly after noticing the high default rates of recent affordability products in some European countries. In addition, consumer indebtedness rose to record level in many jurisdictions in the run up to the financial crisis of 2007 and has raised serious concerns as to borrowers' ability to repay their debts.

The following sections outline employment and other income-related features that DBRS considers may affect performance behaviour. These features are for owner-occupied properties only and do not apply to buy-to-let (BTL)/investment products, which are discussed separately in a later section.

Self-Certification

Self-certification is used by borrowers who want to obtain a mortgage without having to demonstrate their earnings to a standard required by conventional mortgage underwriting criteria. In such cases, applicants simply declare their own income, without having to provide the lender with any underlying documentation (e.g. pay slips, audited accounts, tax returns, etc). Self-certification initially evolved as a product aimed at self-employed, commission-based or contract workers. Self-employed borrowers may choose to self-certify for a number of reasons. Firstly, most lenders require self-employed workers to provide two to three years of audited financial accounts, which disqualifies more recent self-employed borrowers. Secondly, audited accounts and/or current tax returns are often time lagged and may not show the latest figures of a borrower's income. Thirdly, self-employed borrowers may also perceive that supplying the necessary documentation would be too onerous and time-consuming. Commission-based workers may also choose to self-certify, as they receive a salary with a high proportion of bonus payments and hence show a large degree of variability in income over time. Contract workers and those with incomes from a variety of sources usually choose to self-certify because their total earnings may not otherwise be considered under a traditional mortgage.

Whilst there may be valid reasons for self-certification, there are additional risks with self-certified mortgages. Historical data indicates that mortgage lenders generally have a higher level of material arrears for their self-certified portfolios compared to mainstream lending. Lenders endeavour to offset this risk in a variety of ways, the most common being:

- Most self-certified mortgage providers pass the applicant's stated income through a plausibility check to ensure their stated job type fits within a reasonable salary range;
- More conservative credit score cards are taken into account when assessing self-certified mortgage applications, as well as lower LTV ratios so as to deter borrowers from taking out a mortgage that they cannot afford;
- Fraud detection systems in various jurisdictions also discourage systematic fraud in the self-certified market.

Despite these additional safeguards, the higher level of arrears experienced with this product type and the potential for abuse by borrowers means that DBRS considers self-certified loans to be riskier than benchmark loans. Note that DBRS considers self-certification products to employed borrowers riskier than those to self-employed borrowers, given that the latter may have a more "legitimate" reason for self-certification (such as the burden of supplying audited financial accounts). DBRS notes that since the onset of the global financial crisis self-certified loans are no longer generally available.

Self-Employed

Self-employed borrowers who do not self-certify their income need to provide the mortgage lender with documentary evidence of their earnings (e.g. latest tax certifications). However, compared with borrowers who are employees, self-employed borrowers tend to have less stable monthly income. In addition, self-employed borrowers often need to undertake large financial investments in order to set up their own business, which may make them more vulnerable in an increasingly stressful financial environment.

Loan-to-Income (LTI)

LTI is a measure of loan affordability and is commonly used by lenders to determine how much they are prepared to advance on a mortgage. LTI is calculated by dividing the loan balance by the total income for the household (e.g. the sum of incomes in the case of multiple borrowers). Many lenders also use more sophisticated affordability measures to take into account other financial commitments (e.g. council tax, unsecured loan repayments, childcare costs, utility bills, etc.). Although it is likely that more complex affordability tests are better indicators of risk than a simple LTI measure, the components of these measures are not consistent across lenders. As such, DBRS considers LTI a simple but effective means of assessing affordability.

A higher LTI ratio is a sign of greater financial commitments and makes a borrower more susceptible to default in case of a life changing event such as divorce or loss of job, or an economic shock such as interest rates increases. DBRS applies a risk adjustment to the benchmark two-year PD based on a borrower's LTI ratio.

Income data may not be available for seasoned loans, in which case, for loans that have exhibited performance that is in line with loans where income has been provided, DBRS calculates a conservative estimate of a borrower's income by using the originator's underwriting metrics (maximum loan-to-income, maximum debt-to-income ratios, etc). In addition, DBRS expects that originators can represent within the transaction documentation that the loans have been underwritten in accordance with underwriting practices. Additional comfort may also be drawn from, depending on their scope and results, Agreed Upon Procedures and/or pool audits.

Single Income

When mortgage repayments are serviced by two separate incomes, if one income becomes unavailable (e.g. as a result of unemployment), being able to rely on a co-borrower's income mitigates the likelihood of default. As such, the repayments on a mortgage serviced by a single income attract a multiple to the benchmark two-year PD rate.

Mortgage Loan Characteristics

Loan-to-Value (LTV)

LTV is the ratio between the principal balance on the mortgage and the property value serving as security for the loan. The input used by DBRS in the default model is the LTV at the time of securitisation (current loan to value). This is calculated by summing all of the outstanding balances from every loan secured by the same property (e.g. first-lien and second-ranking mortgages) and dividing by the appraised value of the property serving as security for the loan itself.

In the case of flexible loans, for the purposes of default probability calculations the current balance is taken into account rather than the maximum drawable amount. For the purposes of loss severity calculations the maximum drawable amount is taken into account instead of the outstanding loan balance.

Higher LTV ratios are associated with increased likelihood of default, attributable to the progressively smaller portion of equity that the borrower has in the property. Equity is the difference between the value of the property and the amount of all loans secured against it. The smaller the equity, the smaller the potential financial benefit the borrower can retain from the property, and the lower the incentive to maintain loan repayments.

The higher the LTV, the more likely the loans are going to default and risk adjustments tend to increase at a faster speed when a LTV is above 80%. The penalty for LTVs increases as the LTV of a loan increases. The increase in penalty is capped once the LTV reaches 105%. In the instance where there are loans in a portfolio with an LTV greater than 105% DBRS makes adjustments on a transaction by transaction basis.

Subsidised Mortgages

DBRS considers loans granted on the basis of government subsidies or other forms of support riskier compared with standard mortgage loans due to the intrinsic weaker profile of the borrower that such subsidies imply.

Loan Purpose

Borrowers may apply for mortgages for a variety of purposes, including home purchase, re-mortgage, debt consolidation, equity release and rehabilitation. Typically, when borrowers re-mortgage, they use the proceeds from the re-mortgage to pay down an already existing mortgage, with the same property being used as security. The main motivation for this type of re-mortgage, also referred to as refinancing, is usually to take advantage of a more favourable interest rate offered by an alternative mortgage provider.

Up to 2008 strong house price appreciation persuaded many borrowers to re-mortgage in order to release equity from their property. As such, a growing proportion of borrowers were raising capital from their properties, hence taking on more debt. Debt consolidation is a particular form of equity release re-mortgaging, where one loan (e.g. the re-mortgage) is taken to pay off other debts already existing (e.g. unsecured loans, credit lines, etc.).

DBRS considers loans granted for purposes other than buying a property to be associated with a higher likelihood of default compared with traditional mortgages. As they allow a borrower to increase their credit exposure, such loans contribute to stretching borrowers' finances, potentially compromising their ability to repay their debts.

Repayment Type

There are two main mortgage repayment methods in Europe: repayment and interest-only (IO), with many variations of each of these two types (e.g. a mixture of the two, where an IO reverts to repayment after a certain time period, investment-backed, etc.).

In a standard repayment mortgage, both interest and some of the capital borrowed is paid back over time to ensure the mortgage is completely paid off by the end of the term. In contrast, IO mortgages only require the repayment of the interest on the initial principal balance at maturity.

There are a number of types of borrower types who might be more likely to opt for an IO loan. Firstly, borrowers with a reduced financial capacity who seek a lower initial instalment and secondly, borrowers who require more flexibility in the way they repay their mortgages. For example, those who have fairly low regular earnings but have expectations for extra financial income (e.g. bonuses) can benefit from smaller regular payments of interest and a more flexible approach to repaying the principal.

With high levels of unsecured consumer indebtedness, combined with high house prices, borrowers have considered IO loans as a way to afford properties that they may not be able to afford with a regular repayment scheme. As such, DBRS has some concern that IO borrowers are more likely to have stretched their financial circumstances. In addition, there are further concerns around borrowers' ability to pay back the entire balance due on the mortgage at the maturity date. Although borrowers can refinance at maturity, the market environment at that future date is unknown and, as such, exposes borrowers to refinance risk.

Loan Term

The maximum term offered by European mortgage originators varies by jurisdictions and lender. DBRS regards repayment mortgages with a final maturity longer than typical as riskier compared with shorter amortising products. There is a general concern that a borrower may, as with IO products, choose a long amortisation term in order to reduce monthly payments and, that this could be indicative of potential financial vulnerability. Loans that are not interest only and have a maturity greater than the typical loan maturity for a particular jurisdiction will be penalised. Interest only loans that have a maturity longer than is typical do not have the Loan Term Penalty applied as a separate Interest Only penalty is applied.

Second Lien

A second-lien mortgage is a subordinated loan taken on a property already used as security for an existing mortgage. Lien positions differentiate levels of subordination in the rights of creditors to receive proceeds from the sale of the mortgaged property in the event of borrower default, in other words although a first and second lien are both secured the second lien holder will not be paid off until the first lien holder has been paid off in full. Second-lien mortgages, although a common feature of many mortgage finance products, generally have a different purpose across European jurisdictions. In some jurisdictions, second-lien mortgages are generally taken out as an equity release tool for raising capital or to finance the down payment of a purchase. Second-lien loans that are potentially granted to borrowers who are unable to re-mortgage easily to release equity may represent a riskier profile than the benchmark.

Loan Product

DBRS applies risk adjustments to loan products where there is the potential risk of payment shock (i.e. a sharp increase in regular mortgage payments as a result of a change in the interest rate on the loan). Fixed rate (short term) loan products are seen to have to most potential for significant payment shock, as they do not adjust incrementally with increases in the base rate. If interest rates increase during the fixed period, the borrowers become exposed to a substantial and sudden increase in their regular mortgage payments at the time of the switch to standard floating rate.

Buy-to-Let (BTL)/Investment Properties

A BTL mortgage is for the purchase or re-mortgage of a residential property used for investment purposes. Here, the property is let to tenants as opposed to direct occupation by the borrower. The expansion of the BTL market in some jurisdictions was attributable to strong house price appreciation and good rental demand in the past decade. DBRS considers BTL performance to be likely influenced by a number of factors:

- A decrease in the minimum required rental coverage ratio, which is computed as the expected monthly rental income divided by the monthly mortgage repayment;
- Higher LTV ratios, mainly as a result of increases in the maximum amount lent to landlords;
- Changes in the type and experience level of borrowers accessing the residential property market; a growing proportion of new entrants are "amateur" landlords.

BTL mortgages are also exposed to the risk that the property may not be tenanted for part of the year, meaning the landlord may need to rely on alternative income to cover the loan repayment. Lenders try to mitigate the above exposure by requiring the rental coverage ratio to exceed 100%, but the surplus rent may not be sufficient to cover long void periods without tenancy, as well as other repairs and maintenance costs.

Although a BTL loan attracts a multiple that increases the PD in comparison with the benchmark PD, note that these types of mortgage loans are not exposed to the employment or income multiples that are associated with owner-occupied properties but rather depend on the expected income generated by the property.

Credit Risk Layering

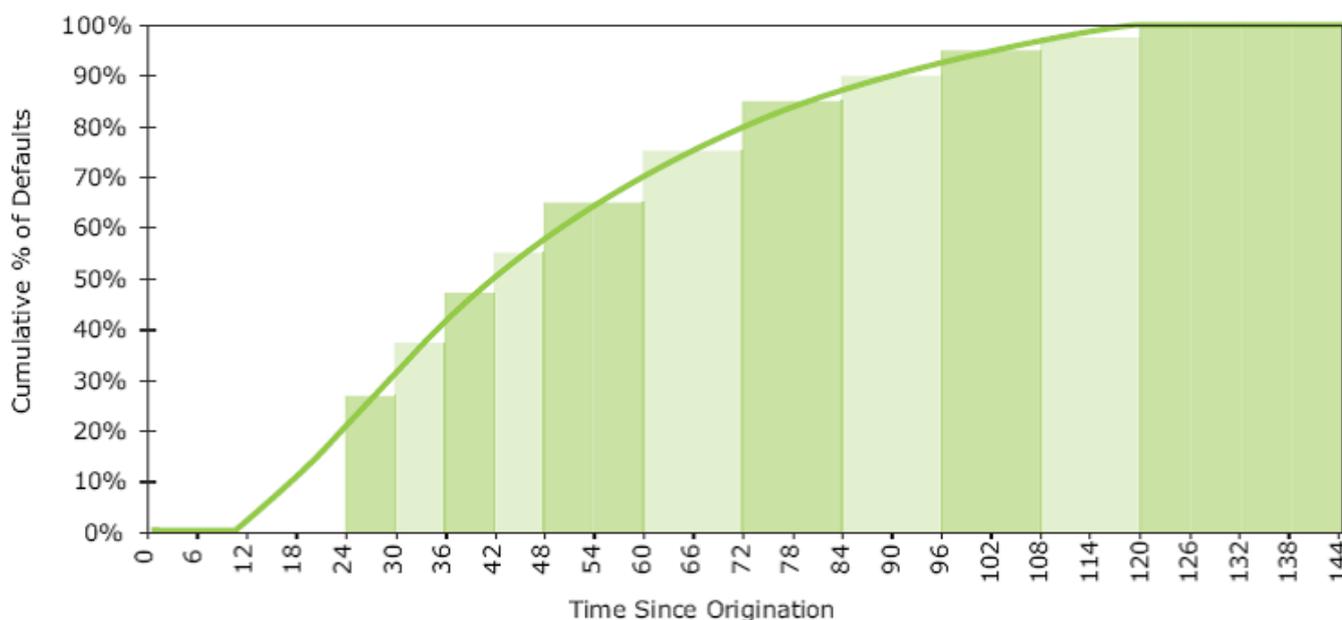
DBRS makes a benchmark two-year PD adjustment to account for risk layering within a single mortgage loan; that is, the simultaneous presence of multiple risk factors is assumed to have an adverse effect on PD over and above that predicted by the single multiple associated with each component. Credit risk layering has been an important contributor to the rise of arrears and defaults in the U.S. mortgage market in recent times, and although the presence of credit risk layering in the European countries has not been as prevalent as in the U.S., DBRS considers this to be an important element in ultimate default behaviour.

Simultaneous risk elements include combinations of high LTV (indicating minimal borrower down payments), past credit problems (e.g. past CCJ and/or bankruptcy), and high LTI ratios and/or self-certification. Additional risk layers may be assigned for specific countries and jurisdictions.

The Base Case Lifetime PD Estimate

In order to expand the two-year loan PD estimates to “lifetime” expectations, the two-year estimate is extended by means of an assumed cumulative default distribution. The cumulative default curve for mortgages follows a fairly stable pattern over both time and different data sources, with the majority of defaults on a static portfolio occurring by the end of year five (60 months). The assumed cumulative default curve takes into account historically perceived cumulative default distributions. A sample cumulative default distribution is given in the graph below. Note for simplification that the fitted curve has been divided into six- to 12-month segments (this also allows for more stability in the lifetime default estimates over small changes in seasoning).

Figure 1: DBRS Sample Cumulative Default Curve



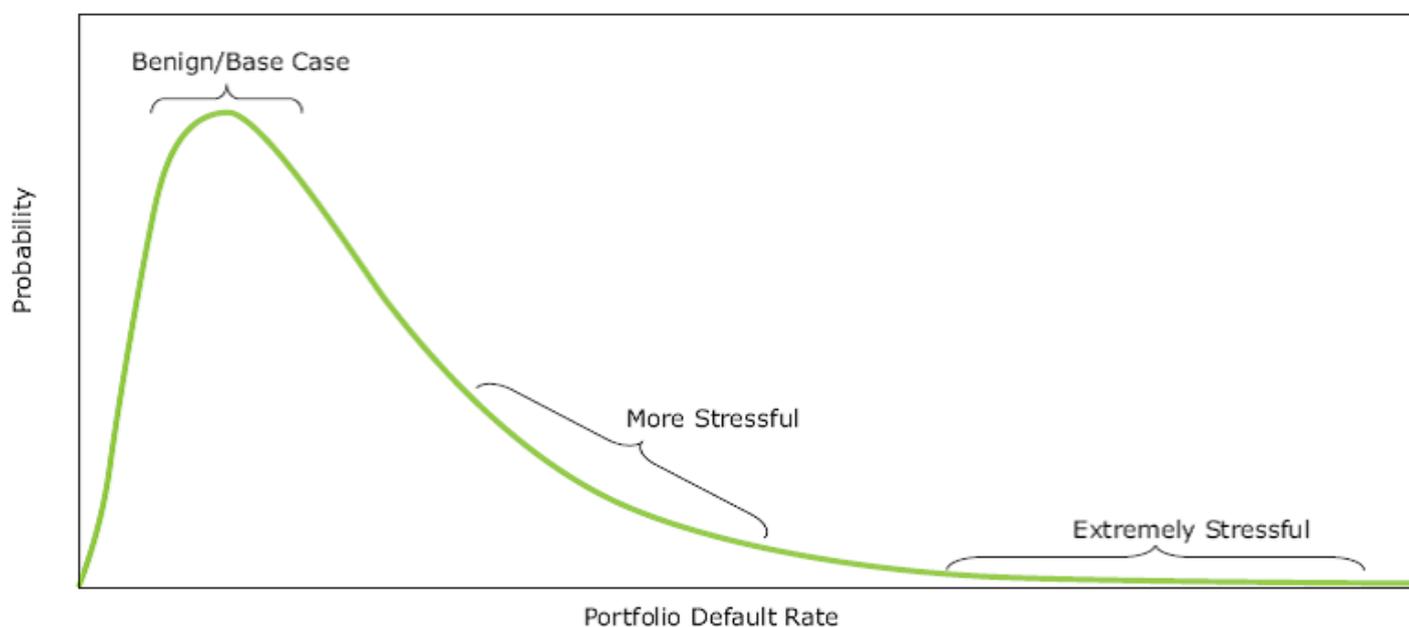
In order to calculate the lifetime PD estimate for a single loan, the percentage of cumulative defaults that should have occurred by the number of months the loan is seasoned (the number of months since origination) plus 24 months (the length of time the two-year PD estimate is predicting forward) is derived from the assumed cumulative default distribution shown in Figure 1. Consider the following example where a loan is seasoned for six months and has a current two-year PD estimate of 3%. The six-month seasoning plus the 24 months takes the loan to 30 months in the cumulative default curve. Reading from the bar chart plotted above, the percentage of cumulative default assumed to have occurred by 30 months is 37.5% (note that this percentage is the same for all loans seasoned between six months and 12 months). This means that the two-year PD estimate of 3% represents 37.5% of the lifetime PD estimate. The two-year PD estimate therefore needs to be multiplied by $100\%/37.5\%$ (or 2.67) to get the lifetime PD estimate ($3\% \times 2.67 = 8\%$).

Portfolio Default Rate Distribution

The analysis described in the previous section details the approach used to project “lifetime” base case loan level PDs. DBRS considers that the results represent a “B” rating scenario or base case. Under more stressful economic conditions, however, a portfolio is expected to exhibit a higher default rate than the base case.

DBRS assumes that for a single portfolio of mortgage loans, there is a distribution of potential future portfolio default rates. The default rate that is exhibited by a portfolio is a function of the base case performance and the prevailing economic conditions, as represented in Figure 2. Given that mortgage portfolios are typically very large (e.g. greater than 1,000 loans), there is generally no need to simulate the default of each loan to create a distribution of defaults. A given loan may or may not default, but with such a large portfolio, the loss incurred by a single loan is negligible, and the primary concern is the overall portfolio default rate. As a consequence, simple analytical models can be used to estimate the portfolio default distribution, in particular the “tail” behaviour of the distribution that extends well beyond historically observed mortgage default rates.

Figure 2: Example Distribution of Mortgage Portfolio Default Rates



The framework used to approximate a distribution of mortgage portfolio default rates is a modified version of the single factor Gaussian credit loss model first proposed by Vasicek (1987).¹ This model allows for the creation of a hypothetical distribution of mortgage defaults using two parameters: the mean (or expected) portfolio default rate and the sensitivity of borrowers to changes in the economic environment.

The mean of the portfolio default distribution can be assumed to be the weighted average of the base case lifetime PDs.² The variation in the distribution is determined by a measure of borrower sensitivity to macroeconomic effects. The influence of the economy, despite its complexity (e.g. GDP, interest rates, unemployment), can be approximated as a single factor that influences borrowers' propensity to default. Sensitivity to this factor is equivalent to assuming individual mortgage borrower performance is correlated, where the higher the sensitivity, the higher the correlation. For a more technical description of the single factor model framework, please see Vasicek (1987) or Gordy (2003).³

1. Vasicek, O. (1987). "Probability of Loss on Loan Portfolio." Working paper, Moody's KMV.

2. DBRS floors the base case portfolio PD estimate at 1%. In order to continue to rank-order portfolios with very low expected default rates, a scaling factor that decreases as PD increases is applied to all base case portfolio expected default rates below 2%.

3. Gordy, Michael B. (2003). "A Risk-Factor Model Foundation for Ratings-Based Bank Capital Rules," *Journal of Financial Intermediation*, 12, pp. 199–232.

The single factor model approach is very similar to the Basel II methodology for large, well-diversified mortgage portfolios, with one key difference. DBRS assumes that the single factor correlation changes over base case default rates, whereas in the Basel II framework, the correlation remains constant at 15%. The correlation is capped at 25% for all portfolios with expected lifetime base case PD below 2%. It then decreases as the mean default rate increases and floors at 10% once the mean portfolio default rate reaches 8%. The decrease in correlation at high default rates can be interpreted as a decrease in the sensitivity of high-PD borrowers to macroeconomic effects relative to low-PD borrowers (i.e., high-PD borrowers are more prone to idiosyncratic (borrower-specific) effects than low-PD borrowers).

Rating-Specific Portfolio Default Rates

The analysis described in the previous section results in an analytical distribution of potential default rates for the mortgage pool. Given that a DBRS rating ultimately addresses the probability of default of a tranche backed by the mortgage pool, the distribution can be analysed to determine a portfolio default rate that is consistent with a given rating. This is done by determining the probability that a certain default rate will be exceeded and ensuring that this probability is less than or equal to the default probability of a benchmark bond. The benchmarks are derived from the DBRS published idealised default table.

Loss Given Default

This section describes the DBRS methodology used to calculate the loss given default (LGD) for European residential mortgage portfolios. This approach is primarily centred on the potential market value decline a foreclosed property could experience compared with its valuation at the time of portfolio assessment. As such, the DBRS analysis focuses both on foreclosed property values compared with the general market norm and on how they may behave under more stressful conditions.

LGD Overview

Upon default, the property is repossessed and sold to recoup the amount owed by the borrower. Upon sale, the amount owed by the borrower not only includes the loan principal balance; there will also be costs associated with the foreclosure process and the forced sale, and given that there is a lag between severe delinquency status and the actual property being sold, the borrower will also owe accrued interest. Note that, for simplicity, the LGD calculations described in this report exclude accrued interest.

LGD is calculated by taking the difference between the outstanding principal loan balance owed by the borrower (also known as exposure at default, or EAD) and the recoveries deriving from the sale of the property and any other form of credit mitigation in place (e.g. mortgage insurance payments), net of any costs and prior ranking loans. This difference is then expressed as a percentage of the EAD, which cannot be less than zero.

$$\text{LGD} = \frac{\text{EAD} - (\text{property foreclosure sale price} - \text{costs} - \text{prior ranking loans})}{\text{EAD}}$$

In Europe, with the notable exception of the Netherlands, most loans are originated with LTVs that are lower than 100%; that is, the loan principal balance advanced is less than the value of the property.

Despite this, if the market value is eroded for any reason (property neglect, economic downturn) and repossession and sale costs are netted from recoveries, then losses will be observed. The decrease in the property value is commonly referred to as a market value decline (MVD) and is clearly a key factor when determining expected losses for mortgage defaults.

Components Of LGD

The DBRS methodology for the estimation of each of the contributing components to LGD (e.g. the amount owed, the costs, the property valuation and the assumed recoveries upon sale) is described in the following pages.

Principal Amount Owed (Exposure at Default, or EAD)

DBRS expects that loans are more likely to default relatively early in their life, with the highest default vulnerability occurring between 12 and 60 months. Loans defaulting within this period are unlikely to show significant decreases in the principal amount owed at origination (amortisation). Loan products that do amortise tend to show minimal decreases in the first years of their life, and there are also many non-amortising products now being originated in Europe. In addition, although certain

borrowers may manage to pay off more principal balance through partial prepayments, it is less likely that this borrower type will subsequently default. Therefore, DBRS assumes that the principal amount owed at default is the same as the balance at the time of the portfolio assessment (e.g. the date of pool cut).

Current Property Value

DBRS makes adjustments to the given property valuation on the basis of the property valuation method, and may make adjustments for the time of origination in order to account for any material increase or decrease in the property valuation since the given valuation date.

Property Valuation Methods

There are a number of methods that are currently used to value properties in Europe to assess their adequacy as security for a mortgage advance. In some jurisdictions, lenders have relied on a full physical valuation, where a property expert such as a chartered surveyor would visit the property in question. The surveyor valuation is based on the condition of the interior and exterior of the property, in addition to comparative sales in the vicinity and general market activity. However, a number of alternative valuation solutions, such as Drive-by Valuation, Desk Top and Automated Valuation Models, have evolved. In general, these alternative solutions are restricted to either less risky loan characteristics (such as low LTV loans) or situations where there is a known past physical valuation.

- *Drive-by Valuation:* A valuer visits the property and assesses it from the property boundary. Comparative sales and market activity also contribute to the final valuation.
- *Desktop Valuation and Automated Valuation Models (AVMs):* In both desktop and AVM valuations, a property is valued without any physical inspection. With a traditional desktop valuation, a house price index or a comparable property evaluation is used to estimate the property value, usually from a past known full property value. A more formalised version of the desktop valuation is derived using an AVM, which assigns a property valuation using a statistical algorithm that can run on an automated basis once certain property characteristics are entered by the user. The AVM derives values based on an analysis of comparable sales in the area and property value indexation (e.g. from repeated sales). The accuracy of an AVM generally depends on the number of suitable comparative properties and the age of their valuations. Therefore, AVM performance is best when the property comes from a densely populated homogenous area with a high number of property sales. This statement is true for all methods of valuation. AVMs, however, are unique in that each valuation produced is accompanied by an independent measure of “confidence.”

AVM confidence measures are based on the number, similarity and time of the comparable properties used to calculate the target valuation. The more similar and numerous the comparables are, and the more recent the sales data, the higher the level of certainty that can be associated with the target property valuation. Surveyor, desktop and drive-by valuations have no such measure of accuracy. This, however, does not mean they are immune to the specifics of a particular market, which can make valuations inaccurate and volatile (e.g. sparsely population regions, unique property features, or low comparable sales).

Adjustments Based on Valuation Method

DBRS typically considers a full surveyor valuation as the standard. As a consequence, typically no adjustments are made to such valuations. The other property valuation methods, in some circumstances, are adjusted downward.

Property Indexation

With the exception of Ireland, DBRS does not typically give any formal credit to positive property indexation. However, in times of significant price rises or declines since origination DBRS considers the appropriateness of the standard market value declines (MVDs) for each jurisdiction and may increase or decrease the standard market value declines accordingly. DBRS discloses the MVDs used in its rating disclosures.

Sale Price of the Foreclosed Property

DBRS believes a forced sale as a result of property repossession will result in a discounted sale price relative to a property sold that has not been repossessed. Therefore, although average historic house price indexes are useful in estimating potential MVDs for the housing market as a whole, they do not indicate how repossessed properties performed relative to the average.

The Benchmark MVD

It is important to note that housing market cycles differ by country; hence DBRS considers a wide range of macroeconomic variables to determine the benchmark MVDs within each European jurisdiction.

Adjustments to assumed MVDs for repossessed properties are usually made to capture additional risks associated with repossession sales. Analyses of historical house price declines do not always take into account how the sale prices of repossessed properties would behave in severe economic environments, such as those experienced in several European markets over the last few years.

MVD Benchmark Adjustments per Property

The benchmark MVD is then altered on a property-by-property basis depending on various borrower and property factors that DBRS assumes to influence a property's resale value. The factors that result in MVD adjustments are property location, property size and property type.

- *Property Location Adjustments:* Historical house price trends in Europe have shown considerable and persistent regional differences. In certain geographical areas, especially those far from significant cities, historical prices tend to display higher volatilities as demand weakens. DBRS may adjust the benchmark MVD where appropriate, in order to differentiate regional demands within each jurisdiction.
- *Property Size Adjustments:* Very expensive and inexpensive properties tend to have more volatile and less liquid resale markets because of the more limited number of potential buyers. In addition, the scarcity of good comparable valuation benchmarks increases the potential for the valuation of these properties to be overestimated. DBRS increases the MVD for property valuations for such properties, computing the adjustment by comparing the subject property to an average property valuation within the region.

Sale Price of the Foreclosed Property: Overall Calculations

For every loan in the mortgage pool, DBRS determines an updated valuation and then computes the expected sale price at repossession by subtracting from this value the associated MVD.

Costs

The lender bears a number of costs associated with loan delinquency, repossession and subsequent property resale; hence, these payments need to be subtracted from the sale proceeds. Costs include legal fees (e.g. as the result of possession, eviction and property sale procedures), expenditures associated with any property maintenance the sale requires and the estate agency charge. Estate agency fees are usually calculated as a percentage of the sale price of the property and are therefore based on the assumed property value after the MVD has been taken.

Prior Ranking Loans

For second-lien mortgages, any prior ranking balance is taken into account and deducted from the property foreclosure sale price. This derives from the fact that, as mentioned earlier, lien positions differentiate levels of subordination in the rights of creditors to receive proceeds in case of foreclosure.

Loss Given Default (LGD) Per Rating Level

Loan-Level and Portfolio-Level LGD Calculations

On a loan-level basis, LGDs are computed for all rating scenarios using the following process. Firstly, the property value at foreclosure is estimated by valuation adjustments, if any. The sale price at foreclosure is then derived using the appropriate loan-level MVD at each rating scenario. Given that MVDs are rating dependent, the assumed costs will then vary accordingly, because they are a function of the foreclosure sale price. LGD is then calculated by subtracting the expected foreclosure sale price from the EAD and adding costs and any existing prior ranking balance, and then dividing the remainder by the EAD. Fixed and variable costs associated with foreclosure are specific to each jurisdiction.

The portfolio-level expected loss is the balance-weighted average loan-level expected loss. The portfolio-level LGD is the ratio of the portfolio-level expected loss to portfolio-level default rate.

Cash Flow Analysis

Summary

DBRS undertakes a detailed cash flow analysis to ensure timely payment of interest and ultimate payment of principal at each rating category. The cash flow modelling assumptions DBRS uses for rating RMBS transactions focus on the prepayment speeds, timing of defaults and recoveries and interest rate stresses. As indicated in the table below, multiple scenarios based on the combinations of these assumptions are typically applied to test the resilience of the rated bonds. The upward and downward interest rate stresses referenced below are generated for the applicable currency by the *Interest Rate Stresses for European Structured Finance Transactions Methodology*. The table below details the stresses that DBRS typically applies in its cash flow analysis. Typically a mortgage security would need to pass all scenarios at the relevant rating level. However, in certain circumstances a rating committee may elect to discount a specific scenario. This would be determined on a case by case basis and the rationale for doing so would be highlighted in any relevant ratings commentary.

Table 1: DBRS Standard Cash Flow Stress Scenarios*

Scenario	Prepayments	Default Timing	Interest Rate
1	Slow	Front-loaded	Upward
2	Mid	Front-loaded	Upward
3	Fast	Front-loaded	Upward
4	Slow	Back-loaded	Upward
5	Mid	Back-loaded	Upward
6	Fast	Back-loaded	Upward
7	Slow	Front-loaded	Downward
8	Mid	Front-loaded	Downward
9	Fast	Front-loaded	Downward
10	Slow	Back-loaded	Downward
11	Mid	Back-loaded	Downward
12	Fast	Back-loaded	Downward

* Additional scenarios may be necessary depending on the pool attributes and transaction capital structure.

Loss Expectation

As described in previous sections, the first step in analysing a pool of mortgage loans is to determine the loss expectations for each rating category. DBRS uses the loan-level RMBS model to derive default probabilities and loss given defaults based on a pool's collateral composition. External factors are also taken into consideration, including the origination process, the capability of the servicer and the originator's historical performance.

Prepayment Speeds

Prepayment speed measures the rate at which borrowers make their principal payments prior to the scheduled maturity date. Prepayments reduce the outstanding principal balance of a mortgage pool, thus reducing excess spread. The faster the prepayment speeds, the quicker excess spread is depleted.

Historical data shows a correlation between a borrower's prepayment behaviour and interest rate movements. Generally, in a declining interest rate environment, borrowers are motivated to refinance and may do so if their credit profile allows. Conversely, prepayment speed typically slows as interest rates rise. However, in the current market, despite extremely low interest rates, voluntary prepayments remain extremely low. Faced with either blemished credit histories or insufficient home equity and tougher underwriting standards, many existing borrowers find it difficult to refinance.

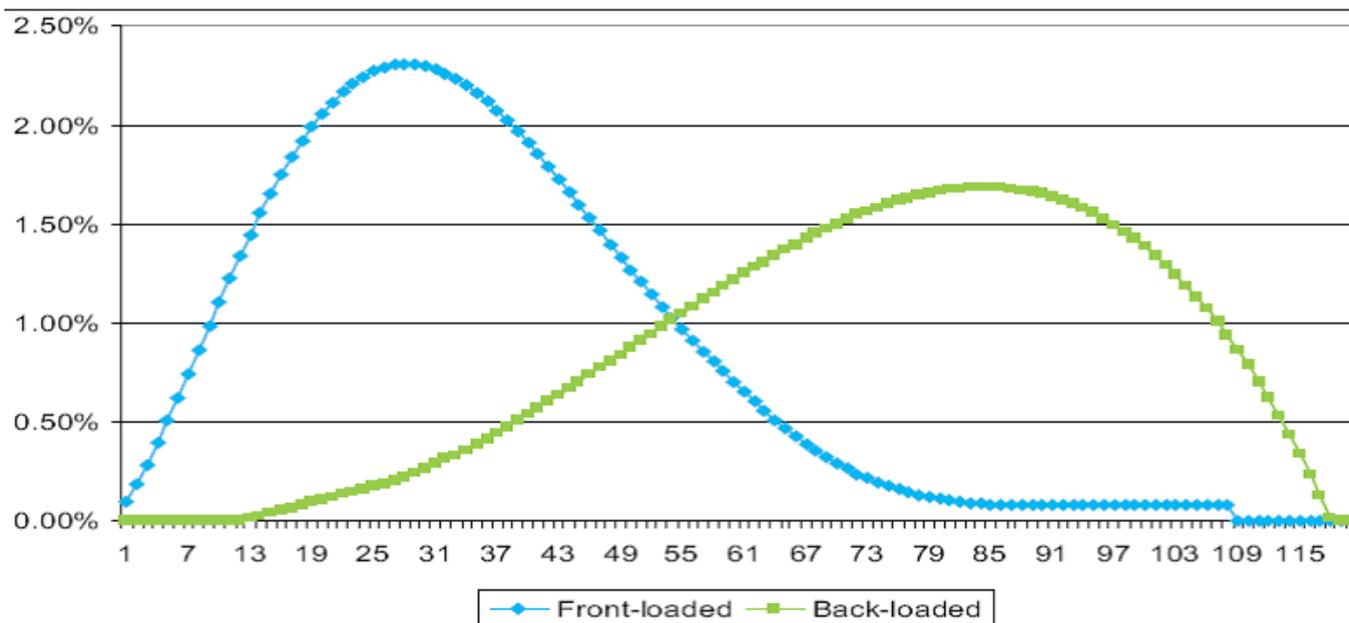
The current low prepayment environment presents a challenge in stressing RMBS transactions as slow prepayment speeds lead to slow build-up of credit enhancement. Conversely, high prepayment speeds stress excess spread properly, but may also deplete collateral too quickly to allow 100% of the expected losses to pass through the capital structure. As a result DBRS finds it prudent in the current environment to apply three prepayment stresses (slow, middle and fast) that range from 5% to 20% conditional prepayment rates (CPR). The stresses are also compared to the originator's actual prepayment experience. Different stresses may, however, be applied depending on the jurisdiction and the nature of the collateral.

Timing of Defaults and Recoveries

The timing of defaults is a key factor in evaluating the cash flow structure of a transaction. DBRS estimates two default timing patterns: front- and back-loaded, as shown in the graph below. These curves illustrate how defaults will be distributed throughout the life of a transaction.

Because servicers do not advance cash for mortgages in arrears, any principal and interest payments will be shut off as soon as a loan becomes delinquent. Under the assumptions DBRS uses to model cash flows once the cash flow is shut off, any recoveries or liquidation proceeds will not be available for an extended period of time. The length of this period is dependent on the foreclosure and liquidation timeline within each jurisdiction and varies by transaction.

DBRS Standard Default Timing Pattern



Interest Rate and Basis Risk

Interest rate risk occurs when the interest rate on the underlying mortgage loans adjusts differently from the interest coupon on the bonds. For example, assume that the underlying mortgage loans are either fixed-rate or fixed rate (short-term),⁴ and the bonds are based on the European Interbank Offered Rate (EURIBOR), if EURIBOR rises, all other things being equal cash flow to the transaction decreases. Interest rate mismatches also exist for securitisations in which the mortgage loans and bonds adjust based upon different indices (Basis Risk). If the two indices were to converge, cash flow to the transaction would be affected. It is important to quantify the effect of this mismatch by stressing interest rates.

When stressing interest rates in some European RMBS transactions, DBRS often notices that under a few extremely conservative stress scenarios, namely high interest rate stresses coupled with a front-loaded default timing pattern, the rated bonds tend to come under a significant amount of pressure. In such scenarios, front-loaded defaults shut off a considerable amount of interest payments from the mortgage assets, causing an interest shortfall to the bonds.

When this happens, the principal portion of the mortgage payment, which otherwise would have been used to amortise the bond balances, will likely be “borrowed” to cover these interest shortfalls, thus prolonging the paydown of the rated bonds. The more principal cash used to cover interest shortfalls, the longer it takes to retire the rated notes. Under such scenarios, credit enhancement levels, which are greater than the expected losses, may be insufficient for such ratings on account of “borrowed principal” to cover interest shortfalls.

4. Fixed rate (short-term) pays a fixed-rate coupon for a short-term (commonly between two and five years), then switch to a variable rate for the remaining years until the maturity date.

Jurisdictional Specific Addenda

The DBRS Master European Residential Mortgage-Backed Securities Methodology sets forth the analytical framework for the DBRS credit analysis of European RMBS. DBRS has published a number of country-specific addenda to this master methodology (appended hereto) that detail the factors and multipliers of each of the PD and LGD drivers for given jurisdictions.

Belgian Residential Mortgage Addendum

This report details the specific risks of Belgian residential mortgages and DBRS analytical treatment of these risks when projecting default probability, loss given default and expected losses for such loans. The addendum can also be applied to the analysis of cover pools in covered bond transactions backed by residential loans in Belgium.

As noted in the master methodology, DBRS RMBS loss analysis is divided into two distinct segments. The first segment determines the probability of default of each underlying borrower which is then aggregated to derive a pool level default probability. The second segment of the analysis derives the estimated loss given default of each mortgage followed by an aggregation to an overall pool level loss projection. The product of the default probability and loss given default gives the total expected losses for the pool.

Mortgage Mandates

The transaction costs of buying residential property in Belgium are high and as a consequence of this the Belgian market has developed certain structural features in an attempt to mitigate the overall cost of residential property transactions. Two types of loan are possible:

- A registered mortgage
- A notary mandate

As stamp duty is only payable on the registered mortgage, the use of a mortgage mandate lowers the overall cost to the borrower. The notary mandate is an agreement between the borrower or a party closely linked to the borrower that commits the borrower not to take out any further liens on the property. In the event of default the mandate can be converted into a mortgage and the security would be perfected.

The 2012 Mobilisation Act attempted to add clarity to the assignment of credit receivables in the Belgian financial sector. Particularly, mortgage mandates were deemed to benefit the assignee of the receivables and give the right to enforce mortgage mandates to the transferee. Thus the act eliminates the uncertainty that the mandate cannot be legally converted into a mortgage. The risk does remain however that a borrower may have secured a loan with another lender which ranks senior to the mandate after conversion leaving the Issuer with a subordinate secured loan. DBRS assesses the Originator's/Issuer's prior success in converting mandates and subsequent recoveries on the total loan amount (registered mortgage plus mortgage mandate) on a case by case basis when determining the credit given to a mortgage mandate in the loss analysis.

DBRS default probability estimates are driven by the current loan-to-value (LTV) of a loan and in its analysis takes into account the combined value of the registered mortgage and any mortgage mandate when estimating the default probability of an individual borrower.

Multiple Loan Parts and Shared Security

A further complexity of the Belgian market is that it is common for multiple mortgage parts to be secured by one property and for one or more loan parts to be secured by more than one property. In such situations DBRS requests data to be provided that allows calculation of the overall position of the borrower with respect to the security.

Set-off Risk

Deposit Set-off

Under Belgian law, debts which are due and payable between a borrower and a lender can be set-off. In the case of securitised mortgage loans, a borrower will typically not be notified of the assignment of the seller's rights against the borrower. Belgian law allows for set-off by the borrower until the date the borrower is notified of the assignment.

Belgium has a deposit guarantee scheme which guarantees a deposit up to EUR 100,000 per depositor per bank. In the event of insolvency of a bank, a borrower would still have the right of set-off for any amounts due and payable by the bank over and above the deposit guarantee amount of EUR 100,000.

In Belgium set-off by a borrower is also possible post insolvency of a bank if due and payable debts are judged to be closely linked. Please refer to the Belgian addendum to the DBRS Legal Criteria for European Structured Finance Transactions.

Construction Deposits

In addition, set-off risk exists for construction deposits. Construction deposits are loan amounts that have been advanced by the lender to either build or improve a property, but have not yet been fully released to the borrower. If the initial seller were to go insolvent prior to the release of the remaining loan to the borrower, the borrower would not be considered to be liable for the full outstanding loan amount. The borrower could then set-off the un-drawn loan on deposit (the construction deposit) against the full outstanding loan amount. In order to mitigate this risk, the balance of the construction loans is retained at the asset purchaser level, as opposed to being paid in full to the seller. Typically, this amount is only disbursed to the seller once the borrower draws fully on the loan, and as such removes the set-off risk associated with the construction deposits.

DBRS requests an estimation of set-off for each transaction and will assume that, in absence of any structural mitigant, the potential loss posed by possible set-off is treated as a loss of principal in its analysis.

Data Request

When estimating mortgage losses for a pool of residential mortgage assets originated in the Belgium, DBRS requests static pool performance data from each issuer requesting a rating. This data is expected to be representative of the asset pool that is to collateralise the proposed residential mortgage-backed securitisation or covered bond programme. DBRS prefers data that is stratified by product type and/or by loan to value. If various vintages show markedly different performance relative to each other, DBRS assesses the reasons for such performance. For more details please refer to page 7 of the main report.

Probability of Default Analysis

Benchmark Two-Year Probability of Default Estimate

DBRS calculates the benchmark two-year Probability of Default (PD) for each pool based on historical issuer specific data. The calculation of the two-year PD is typically weighted by the corresponding two-year PD for that particular year of origination. For example, if the origination vintages of a pool being analysed were evenly distributed across four years (for example 2004, 2005, 2006 and 2007), DBRS calculates the two-year PD for each vintage of historical data and applies the respective calculations to the vintage weighting.

Mortgage Loan and Product Specific Default Penalties

Having established a two-year PD for a particular issuer, DBRS then applies borrower-, and mortgage loan characteristic specific default penalties to each loan to arrive at a base case two-year PD. The list of typical assumptions used when assessing default risk in Belgian residential mortgages appears at the end of this addendum. However, the numbers presented are not prescriptive and the actual figures used may differ by transaction. The default penalties used for the analysis of Belgian mortgages were validated by performance data outside of the jurisdiction. As a result, DBRS conducts additional analysis of issuer vintage performance data as a reasonableness check against the base case portfolio default rate. In the absence of loan level data for historical performance, DBRS assesses the origination trends and underwriting guidelines of the issuer to estimate a portfolio default rate of the underlying pool. In cases where deemed necessary, DBRS adjusts the base case portfolio default rate accordingly. Disclosure of the assumptions used for each transaction is available on www.dbrs.com.

Mortgage Loan Characteristics

Loan-to-Value (LTV)

LTV is the ratio between the principal balance on the mortgage and the appraised value of the property serving as security for the loan itself. The input used by DBRS in the default model is the LTV at the time of securitisation (current balance over original valuation).

For loans where a credit limit is approved for a borrower, the credit limit amount is considered for the calculation of LTV, assuming a full draw down under the limit. For loans where the loan amount provided to the borrower can increase based on the security i.e. mortgage plus security mandates, the loan amount assumed for the LTV calculation would equal the value of the mortgage plus any security mandates. DBRS thus assumes the loan amount to equal the maximum amount drawable by the borrower, under both the above cases, for calculation of LTV.

Subsidised Mortgages

Subsidised loans are rare in Belgium. Notwithstanding this, DBRS considers loans granted on the basis of government subsidies or other forms of support as riskier compared with standard mortgage loans due to the intrinsic weaker profile of the borrower that such subsidies imply.

Loan Purpose

Increased default penalties are applied to loans where the loan is for debt consolidation of unsecured borrower debt. DBRS reviews underwriting procedures and product specifications to assess whether, in its opinion, a particular loan product has been used to fund lifestyle expenditures rather than to fund acquisition of residential property to inhabit.

Repayment Type:

There are additional risks associated with Interest Only loans:

- i. Balloon Payment* - Penalties apply for loans where there is a complete absence of a repayment vehicle or where the repayment vehicle will not be sufficient to repay all of the capital of a loan at maturity. DBRS considers the terms of the repayment vehicle and optionality on the part of the borrower to pay into the vehicle when assessing whether to increase default probability for such product. DBRS requests details of borrowers who are in arrears with payments to their repayment vehicle for the purposes of its initial rating and also for surveillance purposes.
- ii. Stretching Income* - As Interest Only loans have lower instalment payments as compared with repayment loans, there is risk that borrowers taking out Interest Only loans may in reality be unable to afford a repayment loan.

The Interest Only penalty in the DBRS loan-by-loan default model is designed to cover both risks. DBRS views 'part and part' loans (loans where part of the balance is part repayment and part interest only) as Interest Only loans.

Loan Term

DBRS applies a penalty for loan terms that are longer than typically seen in the market if it concludes that the reason for such a long loan term is to arbitrage affordability assessments made at the time of underwriting. DBRS assumes that this is the case unless there is detailed credit rationale for longer than average loan terms.

Second Lien

DBRS applies penalties to second lien loans where it is of the opinion that the second lien is being utilised as a financing tool by the borrower for personal consumption rather than for the purchase of the property.

Loan Product

DBRS applies risk adjustments to loan products where there is the potential risk of payment shock (i.e. a sharp increase in regular mortgage payments as a result of a change in the interest rate on the loan). Fixed rate (short term) loan products are seen to have the most potential for significant payment shock, as they do not adjust with increases in the base rate. If interest rates increase during the fixed period, the borrowers become exposed to a substantial increase in their regular mortgage payments at the time of the switch to standard floating rate. Loans that track the ongoing changes in interest rates over time are not subject to this risk adjustment.

Belgian lenders do offer a loan type where the monthly repayments increase over a period of time wherein the principal repayment increases and the interest portion of the monthly repayment decreases. Such progressive increase in repayments expose the borrower to payment shock and thus DBRS applies a PD adjustment to account for the higher risk of default for this mortgage product.

Investment Properties

DBRS applies additional penalties to any loans that are not for residential owner occupation on the basis that it expects performance of BTL to be inferior to that of residential property in a stressed macro-economic environment. DBRS believes that owning and managing a residential investment property/ portfolio requires a borrower to have a higher degree of financial expertise and discipline than is required to own a single property for owner occupation. For example, a landlord has to deal with issues such as legislation, void periods and non-paying tenants. DBRS also expects that in times of significant stress landlords would stop paying commitments on BTL mortgages prior to commitments on the house that they lived in.

Credit Risk Layering

DBRS makes a base case PD adjustment to account for risk layering within a single mortgage loan; that is, the simultaneous presence of multiple risk factors is assumed to have an adverse effect on PD over and above that predicted by the single multiple associated with each component.

Simultaneous risk elements include combinations of high LTV (indicating minimal borrower down payments), past credit problems (e.g. credit register entry), and high loan to income (LTI) ratios and/or self-certification.

Despite the high LTV market, risk layering of the characteristics mentioned above tends to be limited in Belgium.

Construction Loans

Typically the lender will withhold the full loan amount on proviso that certain construction works are performed. When there is satisfactory evidence that the work has been completed (usually in the form of an appraiser's certification) the lender will advance the remaining balance of the loan. There are a number of risks associated with construction loans. The most pertinent risk is the dissatisfaction of the borrower regarding the work product upon completion and the risk the borrower attempts to withhold payment or renege on the mortgage contract.

Flexible Loans

Flexible loans are not common in Belgium, but where encountered, may vary markedly in their features. Certain flexible loans allow payment holidays, others allow for the repayment of overpaid principal, while other types of flexible loans allow for lower monthly payments initially which increase across the tenure of the loan. DBRS reviews the specific underwriting policies of the loans being analysed when assessing its opinion of the increased default risk associated with flexible loans.

Loans to Foreign Nationals

DBRS considers the treatment of foreign nationals for each transaction separately based on the degree of scrutiny employed in the underwriting process.

Borrower Characteristics and Credit Risk

Credit Risk Band and Adverse Credit History

DBRS allocates each loan to a credit risk band. The allocation process is based upon a number of factors including:

- Previous credit impairments as evidenced by central individual credit register.
- Any prior bankruptcy or the equivalent.
- Historical and current arrears on the mortgages.

Depending on the data provided for each of the above factors, DBRS assigns each loan to a credit risk band which ranges from A-E. Credit risk band A is considered the best credit quality with E considered the worst credit quality. A successively higher default penalty is assigned to each successively higher credit risk band.

Self-Certification

DBRS applies additional penalties to loans where the borrower has not proven stated income levels. The penalty is applied on the basis that (in the absence of any checks) borrowers may be incentivised to overstate their income. DBRS also applies penalties to loans where the lender has elected not to check income levels.

Self Employed Borrowers

DBRS employs an additional default penalty to borrowers who are self-employed. DBRS analyses each issuer's underwriting policies with regards to income documentation for self-employed borrowers to determine if further penalties may be warranted as self-employed borrowers' monthly income stream tend to be unsteady.

Loan to Income (LTI)

DBRS applies penalties to certain loans where the borrower's affordability is considered in DBRS opinion to be worse than the average. When assessing the application penalties for higher LTIs, DBRS assesses the income that the lender takes into account during the underwriting process. If income is not provided, DBRS assesses a borrower's income based on debt-to-income and other affordability metrics as described in the issuer's underwriting policies.

Single Income

Loans advanced to only one borrower are subject to an increase in default probability as obligors with two income streams tend to show more financial flexibility in periods of economic stress.

Loss Given Default

In DBRS opinion, the most robust mortgage valuation is by means of a full internal and external inspection by a qualified valuer. The valuation needs to be sufficient to allow the underwriter a comparison of the property in question to that of other comparable recently sold properties. For other valuation methods, such as drive-by valuations, Automated Valuation Models, or desk top valuations, DBRS reduces the stated foreclosure value. The quantum of the valuation adjustment is calculated for each transaction and is based on DBRS assessment of the robustness of the validation procedures implemented by the particular lender. DBRS uses the LTV in its assessment of loss severity.

Typical Market Value Declines

DBRS assumes the following standard market value declines (MVDs) to the appraised value (or the valuation, post any adjustment) for each rating level for Belgian RMBS:

AAA	57.80%
AA (high)	51.92%
AA	50.66%
AA (low)	49.61%
A (high)	48.14%
A	46.99%
A (low)	45.90%
BBB (high)	44.05%
BBB	41.95%
BBB (low)	39.33%
BB (high)	38.07%
BB	35.97%
BB (low)	34.18%
B (high)	32.29%
B	31.24%

Costs of Foreclosure

Standard costs of foreclosure in Belgium are assumed to be a fixed cost of €5,000. For loans which have a mortgage mandate an additional cost will be incurred if the mandate is required to be converted to a registered mortgage, which DBRS assumes to be 2% of the amount covered by the mortgage mandate. DBRS requests lender specific data for each transaction to assess if a different cost of foreclosure assumptions is required.

Foreclosure Timing

DBRS assumes that the typical time it takes to take possession of, sell and realise the cash from the sale of residential a property in Belgium is 24 months from the point of first arrears. This assumption is standard to both loans where the recovery is solely from the sale of the property.

DBRS requests lender specific data on both the time it takes to enact foreclosure proceedings and sell a property for each transaction to assess if a transaction specific adjustment is warranted.

Indexation

DBRS does not apply indexation of property values as a matter of routine in its assessment of loss severity. It applies its MVD to the appraised value (or the valuation, post any adjustment). For seasoned transactions where loans have experienced significant price appreciation or depreciation, DBRS may adjust property values on a case-by-case basis. In addition, DBRS may also adjust original property valuations on a case-by-case basis where data provided indicates that observed recovery rates on property foreclosure are lower than expected.

Appendix: Belgian Loan-Level Risk Adjustments

Risk Characteristic	Characteristic Value	Base Multiple
Loan-to-Value	<=40	0.60
	50	0.80
	60	1.00
	70	1.30
	80	1.65
	90	2.10
	95	2.35
	100	2.65
	>=105	3.00
	Loan Purpose	Debt/Equity Re-Mortgage
Repayment Type	IO	1.35
Loan Term	>25 Years	1.20
Second Lien	2nd Ranking Loan	1.50
Credit Risk Layering	LTV>=95 & Self Cert/High LTI	1.35
	LTV>=90 & Prior DQ	1.75
	LTV>=90 & Prior DQ & Self Cert/High LTI	1.85
Credit Risk Band	A	1.00
	B	1.00
	C	2.00
	D	4.00
	E	8.00
Employment/Income	Self-Certification (Employed)	1.75
	Self-Certification (Self-Employed)	1.35
	Self-Employed	1.15
	Loan-to-Income > 3.5	1.25
	Single Income	1.25

French Residential Mortgage Addendum

This addendum details the specific risks of French residential mortgages and DBRS analytical treatment of these risks when projecting default probability, loss given default and expected losses for such loans. The addendum can also be applied to the analysis of cover pools in covered bond transactions backed by residential loans in France.

As noted in the master methodology, DBRS RMBS loss analysis is divided into two distinct segments. The first segment determines the probability of default of each underlying borrower which is then aggregated to derive a pool level default probability. The second segment of the analysis derives the estimated loss given default of each mortgage followed by an aggregation to an overall pool level loss projection. The product of the default probability and loss given default gives the total expected losses for the pool. For details on DBRS methodology on European RMBS cash flow modelling please refer to page 19 of the master methodology.

Set-off Risk

There is the potential for set-off risk in French transactions in the case of insolvency of the originator. A borrower may invoke the right to set-off in respect of amounts due and payable to the borrower from the originator at the date of assignment of the loan to the issuer. DBRS requests an analysis of the amount of potential set-off for each transaction and makes adjustments to the loss analysis by transaction based on the estimated amount of potential set-off exposure. Please refer to the French addendum to DBRS Legal criteria for Structured Finance Transactions for further information on set-off in France.

Data Request

When estimating mortgage losses for a pool of residential mortgage assets originated in France, DBRS requests static pool performance data from each issuer requesting a rating. This data is expected to be representative of the asset pool that is to collateralise the proposed residential mortgage-backed securitisation or covered bond programme. DBRS prefers data that is stratified by product type and/or by loan to value. If various vintages show markedly different performance relative to each other, DBRS assesses the reasons for such performance. For more details please refer to page 7 of the main report.

Probability of Default Analysis

Benchmark Two-Year Probability of Default Estimate

DBRS calculates the benchmark two-year Probability of Default (PD) for each pool based on historical issuer-specific data. The calculation of the two-year PD is typically weighted by the corresponding origination volume for that particular year of origination. The two-year PD concentration for a particular transaction is calculated by DBRS using the loan-by-loan data tape, or by reference to portfolio level stratifications provided for a particular transaction. For example, if the origination vintages of a pool being analysed were evenly distributed across four years (for example 2004, 2005, 2006 and 2007), DBRS calculates the two-year PD for each vintage of historical data and applies the respective calculations to the vintage weighting.

Mortgage Loan and Product Specific Default Penalties

Having established a two-year PD for a particular transaction, DBRS then applies borrower, mortgage loan and property characteristics specific default penalties to each loan to arrive at a base case two-year PD. The list of typical assumptions used when assessing default risk in French residential mortgages appears at the end of this addendum. The numbers presented are not prescriptive and the actual figures used may differ by transaction. The default penalties used for the analysis of French mortgages were validated by performance data outside of the jurisdiction. As a result, DBRS conducts additional analysis of issuer vintage performance data as a reasonableness check against the base case portfolio default rate. In cases where deemed necessary, DBRS adjusts the base case portfolio default rate accordingly. Disclosure of the assumptions used for each transaction is available on www.dbrs.com.

Mortgage Loan Characteristics

Loan-to-Value (LTV)

LTV is the ratio between the principal balance on the mortgage and the appraised value of the property serving as security for the loan itself. The input used by DBRS in the default model is the LTV at the time of securitisation (current balance over original valuation).

Loan Purpose

Increased default penalties are applied to loans where the loan is for debt consolidation of non-secured lending. DBRS reviews underwriting procedures and product specifications to assess whether, in its opinion, a particular loan product has been used to fund lifestyle expenditures rather than to fund acquisition of residential property to inhabit.

Repayment Type:

Interest-only loans in France tend to be of the short term nature, typically 3 years or less, and a small percentage of total originations. The loans have the risk of a balloon payment at maturity, and additionally are viewed as having more risk than a fully amortising loan due to the payment shock at the end of the interest-only period.

Loan Term

DBRS applies a penalty for loan terms that are longer than typically seen in the market if it concludes that the reason for such a long loan term is to arbitrage affordability assessments made at the time of underwriting unless the issuer provides a credit rationale for longer than average loan terms.

Second Lien

DBRS applies penalties to all second lien loans where it views the additional loan as a second charge rather than a further advance and the loan has a junior security position. Characteristics that may indicate that a loan is in character a second charge are the interest rate on the latest advance is higher than that of other previous advances, the loan term is shorter or the product is underwritten to materially different criteria to that of the earlier senior charge.

Loan Product

DBRS applies risk adjustments to loan products where there is the potential risk of payment shock (i.e. a sharp increase in regular mortgage payments as a result of a change in the interest rate on the loan). Fixed rate (short term) loan products are seen to have the most potential for significant payment shock, as they do not adjust with increases in the base rate. If interest rates increase during the fixed period, the borrowers become exposed to a substantial increase in their regular mortgage payments at the time of the switch to standard floating rate.

Investment Properties

DBRS applies additional penalties to any loans that are not for residential owner occupation on the basis that it expects performance of investment properties to be inferior in terms of performance to residential properties in a stressed macro-economic environment. DBRS believes that owning and managing a residential investment property/portfolio requires a borrower to have a higher degree of financial expertise and discipline than is required to own a single property for owner occupation. For example, a landlord has to deal with issues such as legislation, void periods, non-paying tenants. DBRS also expect that in times of significant stress landlords would stop paying commitments on investment property mortgages prior to commitments on the house in which they reside.

Credit Risk Layering

DBRS makes a base case PD adjustment to account for risk layering within a single mortgage loan; that is, the simultaneous presence of multiple risk factors is assumed to have an adverse effect on PD over and above that predicted by the single multiple associated with each component.

Simultaneous risk elements include combinations of high LTV (indicating minimal borrower down payments), past credit problems (e.g. prior arrears), and high loan to income (LTI) ratios and/or self-certification.

Flexible Loans

Flexible loans are not common in France. However, where encountered, they can vary markedly in their features. Certain flexible loans allow payment holidays, others allow for the repayment of overpaid principal, while other types of flexible loans allow for the full re-draw back to a pre-defined limit. DBRS reviews the specific underwriting policies of the loans being analysed when assessing its opinion of the increased default risk associated with flexible loans.

Loans to Foreign Nationals

Loans to foreign nationals are allowed under French law although they tend not to be a material component of French RMBS transactions. DBRS believes that these types of loans pose greater risk, all other things being equal, than loans to established French nationals. This is because, firstly, the credit profile of the borrower may be lacking in detail or history relative to a borrower who has been established in the country for a longer period. Consequently, there is a possibility that, even if a less complete picture is compensated for in the origination process by factors such as lower LTV lending, that the risk, as measured by probability of default, is higher. In addition, DBRS believes that there is potential for foreign nationals to repatriate themselves in a situation where a property enters negative equity, thus leading to default. As the strength of the underwriting process is critical in mitigating risks associated with lending to foreign nationals the scale of the penalty may vary by transaction

Borrower Characteristics and Credit Risk

Credit Risk Band and Adverse Credit History

DBRS allocates each loan to a credit risk band. The allocation process is based upon a number of factors including:

- Any prior bankruptcy or the equivalent.
- Historical and current arrears on the mortgages.

Depending on the data provided for each of the above factors, DBRS assigns each loan to a credit risk band which ranges from A-E. Credit risk band A is considered the best credit quality with E considered the worst credit quality. A successively higher default penalty is assigned to each successively higher credit risk band.

Self-Certification

DBRS applies additional penalties to loans where the borrower has not proven stated income levels. The penalty is applied on the basis that (in the absence of any checks) borrowers may be incentivised to overstate their income. DBRS also applies penalties to loans where the lender has elected not to check income levels.

Self-Employed Borrowers

DBRS applies an additional default penalty to borrowers who are self-employed. DBRS analyses each issuer's underwriting policies with regards to income documentation for self-employed borrowers to determine if further penalties may be warranted as self-employed borrowers' monthly income streams tend to be more volatile than for those in employment.

Loan to Income (LTI)

DBRS applies penalties to certain loans where the borrower's affordability is considered in DBRS opinion to be worse than the average. When assessing the application penalties for higher LTIs, DBRS assesses the income that the lender takes into account during the underwriting process. If details of income are not provided, DBRS assesses a borrower's income based on debt-to-income and other affordability metrics as described in the issuer's underwriting policies.

Single Income

Loans advanced to only one borrower are subject to an increase in default probability as obligors with two income streams tend to show more financial flexibility in periods of economic stress.

Loss Given Default

In DBRS opinion, the most robust mortgage valuation is by means of a full internal and external inspection by a qualified valuer. The valuation needs to be sufficient to allow the underwriter a comparison of the property in question to that of other comparable recently sold properties. For other valuation methods, such as drive-by valuations, Automated Valuation Models, or desktop valuations, DBRS reduces the stated market value. The quantum of the valuation adjustment is calculated for each transaction and is based on DBRS assessment of the robustness of the validation procedures implemented by the particular lender.

Typical Market Value Declines

DBRS assumes the following standard market value declines (MVDs) to the appraised value (or the valuation, post any adjustment) for each rating level for French RMBS:

AAA	55.30%
AA (high)	49.70%
AA	48.50%
AA (low)	47.50%
A (high)	46.10%
A	45.00%
A (low)	44.00%
BBB (high)	42.20%
BBB	40.20%
BBB (low)	37.70%
BB (high)	36.50%
BB	34.50%
BB (low)	32.80%
B (high)	31.00%
B	30.00%

Costs of Foreclosure

DBRS requests lender specific data for each transaction to assess whether different cost of foreclosure assumption should be used.

Foreclosure Timing

DBRS requests lender specific data on both the time it takes to enact foreclosure proceedings and sell a property to assess if a transaction specific adjustment is warranted. Therefore, assumptions on the time to foreclosure may vary by transaction and are disclosed in DBRS rating commentary.

Indexation

DBRS does not apply indexation of property values, as a matter of routine, in its assessment of loss severity. It applies its MVD to the appraised value (or the valuation, post any adjustment). For seasoned transactions where loans have experienced significant price appreciation or depreciation, DBRS may adjust property values on a case-by-case basis. In addition, DBRS may also adjust original property valuations on a case-by-case basis where data provided indicates that observed recovery rates on property foreclosure are lower than expected.

Appendix: French Loan-Level Risk Adjustments

Risk Characteristic	Characteristic Value	Base Multiple
Loan-to-Value	<=40	0.60
	50	0.80
	60	1.00
	70	1.30
	80	1.65
	90	2.10
	95	2.35
	100	2.65
	>=105	3.00
Loan Purpose	Debt/Equity Re-Mortgage	1.25
Repayment Type	IO	1.35
Loan Term	>25 Years	1.20
Second Lien	2nd Ranking Loan	1.50
Credit Risk Layering	LTV>=95 & Self Cert/High LTI	1.35
	LTV>=90 & Prior DQ	1.75
	LTV>=90 & Prior DQ & Self Cert/High LTI	1.85
Credit Risk Band	A	1.00
	B	1.00
	C	2.00
	D	4.00
	E	8.00
Employment/Income	Self-Certification (Employed)	1.75
	Self-Certification (Self-Employed)	1.35
	Self-Employed	1.15
	Loan-to-Income > 3.5	1.25
	Single Income	1.25

German Residential Mortgage Addendum

This addendum details the specific risks of German residential mortgages and DBRS's analytical treatment of these risks when projecting default probability, loss given default and expected losses for such loans. The addendum can also be applied to the analysis of cover pools in covered bond transactions backed by residential loans in Germany.

As noted in the master methodology, DBRS's RMBS loss analysis is divided into two distinct segments. The first segment determines the probability of default of each underlying borrower, which is then aggregated to derive a pool level default probability. The second segment of the analysis derives the estimated loss given default of each mortgage followed by an aggregation to an overall pool level loss projection. The product of the default probability and loss given default gives the total expected losses for the pool. For details on DBRS's methodology on European RMBS cash flow modelling, please refer to page 19 of the master methodology.

Set-off Risk

There is the potential for set-off risk in German transactions in the case of insolvency of the originator. A borrower may invoke the right to set-off against the special-purpose vehicle (SPV) that they had against the originator prior to assignment and, if the debtor has not been notified of the assignment, the debtor will be entitled to validly discharge his payment obligation by making payment to the originator. DBRS requests an analysis of the amount of potential set-off for each transaction and makes adjustments to the loss analysis by transaction based on the estimated amount of potential set-off exposure. Please refer to the German addendum to DBRS's Legal Criteria for Structured Finance Transactions methodology for further information on set-off in Germany.

Data Request

When estimating mortgage losses for a pool of residential mortgage assets originated in Germany, DBRS requests static pool performance data from each issuer requesting a rating. This data is expected to be representative of the asset pool that is to collateralise the proposed residential mortgage-backed securitisation or covered bond programme. DBRS prefers data that is stratified by product type and/or by loan to value. If various vintages show markedly different performance relative to each other, DBRS assesses the reasons for such performance. For more details please refer to page 7 of the main report.

Probability of Default Analysis

Benchmark Two-Year Probability of Default Estimate

DBRS calculates the benchmark two-year Probability of Default (PD) for each pool based on historical issuer-specific data. The calculation of the two-year PD is typically weighted by the corresponding origination volume for that particular year of origination. The two-year PD concentration for a particular transaction is calculated by DBRS using the loan-by-loan data tape, or by reference to portfolio level stratifications provided for a particular transaction. For example, if the origination vintages of a pool being analysed were evenly distributed across four years (for example 2004, 2005, 2006 and 2007), DBRS calculates the two-year PD for each vintage of historical data and applies the respective calculations to the vintage weighting.

Example:

	% of Pool	2-Yr PD
2004	25%	1.00%
2005	25%	1.50%
2006	25%	2.50%
2007	25%	3.00%
Estimated Pool two-Year PD		2.00%

Mortgage Loan and Product Specific Default Penalties

Having established a two-year PD for a particular transaction, DBRS then applies borrower, mortgage loan and property characteristics specific default penalties to each loan to arrive at a base case two-year PD. The list of typical assumptions used when assessing default risk in German residential mortgages appears at the end of this addendum. The numbers presented are not prescriptive and the actual figures used may differ by transaction. The default penalties used for the analysis of German mortgages were validated by performance data outside of the jurisdiction. As a result, DBRS conducts additional analysis of issuer vintage performance data as a reasonableness check against the base case portfolio default rate. In cases where deemed

necessary, DBRS adjusts the base case portfolio default rate accordingly. Disclosure of the assumptions used for each transaction is available on www.dbrs.com.

Mortgage Loan Characteristics

Loan-to-Value (LTV)

LTV is the ratio between the principal balance on the mortgage and the appraised value of the property serving as security for the loan itself. The input used by DBRS in the default model is the LTV at the time of securitisation (current balance over original valuation).

Loan Purpose

Increased default penalties are applied to loans where the loan is for debt consolidation of non-secured lending. DBRS reviews underwriting procedures and product specifications to assess whether, in its opinion, a particular loan product has been used to fund lifestyle expenditures rather than to fund acquisition of residential property to inhabit.

Repayment Type:

Annuity payment loans have historically been the typical mortgage amortisation profile for German mortgages. However, interest-only loans have played a minor part in some non-conforming lending and are a small percentage of total originations. Interest-only loans have the risk of a balloon payment at maturity, and additionally are viewed as having more risk than a fully amortising loan due to the payment shock at the end of the interest-only period.

Loan Term

DBRS applies a penalty for loan terms that are longer than typically seen in the market if it concludes that the reason for such a long loan term is to arbitrage affordability assessments made at the time of underwriting unless the issuer provides a credit rationale for longer than average loan terms.

Second Lien

DBRS applies penalties to all second lien loans where it views the additional loan as a second charge rather than a further advance and the loan has a junior security position. Characteristics that may indicate that a loan is in character a second charge are the interest rate on the latest advance being higher than that of other previous advances, the loan term being shorter or the product being underwritten to materially different criteria to that of the earlier senior charge.

Loan Product

DBRS applies risk adjustments to loan products where there is the potential risk of payment shock (i.e. a sharp increase in regular mortgage payments as a result of a change in the interest rate on the loan). Fixed-rate (short-term) loan products are seen to have the most potential for significant payment shock, as they do not adjust with increases in the base rate. If interest rates increase during the fixed period, the borrowers become exposed to a substantial increase in their regular mortgage payments at the time of the switch to standard floating rate.

Investment Properties

DBRS applies additional penalties to any loans that are not for residential owner occupation on the basis that it expects performance of investment properties to be inferior in terms of performance to residential properties in a stressed macroeconomic environment. DBRS believes that owning and managing a residential investment property/portfolio requires a borrower to have a higher degree of financial expertise and discipline than is required to own a single property for owner occupation. For example, a landlord has to deal with issues such as legislation, void periods and non-paying tenants. DBRS also expects that in times of significant stress landlords would stop paying commitments on investment property mortgages prior to commitments on the house in which they reside.

Credit Risk Layering

DBRS makes a base case PD adjustment to account for risk layering within a single mortgage loan; that is, the simultaneous presence of multiple risk factors is assumed to have an adverse effect on PD over and above that predicted by the single multiple associated with each component.

Simultaneous risk elements include combinations of high LTV (indicating minimal borrower down payments), past credit problems (e.g. prior arrears), and high loan-to-income (LTI) ratios and/or self-certification.

Flexible Loans

Flexible loans are not common in Germany. However, where encountered, they can vary markedly in their features. Certain flexible loans allow payment holidays, others allow for the repayment of overpaid principal, while other types of flexible loans allow for the full re-draw back to a pre-defined limit. DBRS reviews the specific underwriting policies of the loans being analysed when assessing its opinion of the increased default risk associated with flexible loans.

Loans to Foreign Nationals

Loans to foreign nationals are allowed under German law although they tend not to be a material component of German RMBS transactions. DBRS believes that these types of loans pose greater risk, all other things being equal, than loans to established German nationals. This is because, firstly, the credit profile of the borrower may be lacking in detail or history relative to a borrower who has been established in the country for a longer period. Consequently, there is a possibility that, even if a less complete picture is compensated for in the origination process by factors such as lower LTV lending, that the risk, as measured by probability of default, is higher. In addition, DBRS believes that there is potential for foreign nationals to repatriate themselves in a situation where a property enters negative equity, thus leading to default. As the strength of the underwriting process is critical in mitigating risks associated with lending to foreign nationals, the scale of the penalty may vary by transaction

Borrower Characteristics and Credit Risk

Credit Risk Band and Adverse Credit History

DBRS allocates each loan to a credit risk band. The allocation process is based upon a number of factors including:

- Any prior bankruptcy or the equivalent.
- Historical and current arrears on the mortgages.

Depending on the data provided for each of the above factors, DBRS assigns each loan to a credit risk band which ranges from A-E. Credit risk band A is considered the best credit quality with E considered the worst credit quality. A successively higher default penalty is assigned to each successively higher credit risk band.

Self-Certification

DBRS applies additional penalties to loans where the borrower has not proven stated income levels. The penalty is applied on the basis that (in the absence of any checks) borrowers may be incentivised to overstate their income. DBRS also applies penalties to loans where the lender has elected not to check income levels.

Self-Employed Borrowers

DBRS applies an additional default penalty to borrowers who are self-employed. DBRS analyses each issuer's underwriting policies with regard to income documentation for self-employed borrowers to determine if further penalties may be warranted as self-employed borrowers' monthly income streams tend to be more volatile than for those in employment.

Loan to Income (LTI)

DBRS applies penalties to certain loans where the borrower's affordability is considered in DBRS's opinion to be worse than the average. When assessing the application penalties for higher LTIs, DBRS assesses the income that the lender takes into account during the underwriting process. If details of income are not provided, DBRS assesses a borrower's income based on debt-to-income and other affordability metrics as described in the issuer's underwriting policies.

Single Income

Loans advanced to only one borrower are subject to an increase in default probability as obligors with two income streams tend to show more financial flexibility in periods of economic stress.

Loss Given Default

In DBRS's opinion, the most robust mortgage valuation is by means of a full internal and external inspection by a qualified valuer. The valuation needs to be sufficient to allow the underwriter a comparison of the property in question to that of other comparable recently sold properties. For other valuation methods, such as drive-by valuations, Automated Valuation Models, or desktop valuations, DBRS reduces the stated market value. The quantum of the valuation adjustment is calculated for each transaction and is based on DBRS's assessment of the robustness of the validation procedures implemented by the particular lender.

Typical Market Value Declines

DBRS assumes the following standard market value declines (MVDs) to the lending value (or the valuation, post any adjustment) for each rating level for German RMBS:

AAA	35.20%
AA (high)	33.10%
AA	31.00%
AA (low)	29.80%
A (high)	28.70%
A	27.60%
A (low)	26.40%
BBB (high)	25.10%
BBB	23.90%
BBB (low)	22.70%
BB (high)	21.40%
BB	20.10%
BB (low)	19.20%
B (high)	18.20%
B	17.30%

Costs of Foreclosure

DBRS requests lender specific data for each transaction to assess whether different cost of foreclosure assumption should be used.

Foreclosure Timing

DBRS requests lender-specific data on both the time it takes to enact foreclosure proceedings and sell a property to assess if a transaction-specific adjustment is warranted. Therefore, assumptions on the time to foreclosure may vary by transaction and are disclosed in DBRS rating commentary.

Indexation

DBRS does not apply indexation of property values, as a matter of routine, in its assessment of loss severity. It applies its MVD to the appraised value (or the valuation, post any adjustment). For seasoned transactions where loans have experienced significant price appreciation or depreciation, DBRS may adjust property values on a case-by-case basis. In addition, DBRS may also adjust original property valuations on a case-by-case basis where data provided indicates that observed recovery rates on property foreclosure are lower than expected.

Appendix: German Loan-Level Risk Adjustments

Risk Characteristic	Characteristic Value	Base Multiple
Loan-to-Value	<=40	0.60
	50	0.80
	60	1.00
	70	1.30
	80	1.65
	90	2.10
	95	2.35
	100	2.65
	>=105	3.00
	Loan Purpose	Debt/Equity Re-Mortgage
Repayment Type	IO	1.35
Loan Term	>25 Years	1.20
Second Lien	2nd Ranking Loan	1.50
Buy-to-Let	Yes	2.00
Credit Risk Layering	LTV>=95 & Self Cert/High LTI	1.35
	LTV>=90 & Prior DQ	1.75
	LTV>=90 & Prior DQ & Self Cert/High LTI	1.85
Credit Risk Band	A	1.00
	B	1.00
	C	2.00
	D	4.00
	E	8.00
Employment/Income	Self-Certification (Employed)	1.75
	Self-Certification (Self-Employed)	1.35
	Self-Employed	1.15
	Loan-to-Income > 3.5	1.25
	Single Income	1.25

Italian Residential Mortgage Addendum

This report details the specific risks of Italian residential mortgages and DBRS analytical treatment of these risks when projecting default probability, loss given default and expected losses for such loans. The addendum can also be applied to the analysis of cover pools in covered bond transactions backed by residential mortgage loans in Italy.

As noted in the master methodology, DBRS residential mortgage-backed securities (RMBS) loss analysis is divided into two distinct segments. The first segment determines the probability of default of each underlying borrower which is then aggregated to derive a pool level default probability. The second segment of the analysis derives the estimated loss given default of each mortgage followed by an aggregation to an overall pool level loss projection. The product of the default probability and loss given default gives the total expected losses for the pool.

Set-off Risk

There is the potential for set-off in Italian transactions in the event of insolvency of the originator. A borrower may invoke the right to set-off to the extent of the monies due and payable to him by the originator at the date of assignment of the loan to the issuer. This is a fixed amount set at closing of a transaction. DBRS requests information on the amount of potential set-off for each transaction and will make adjustments to the loss analysis on a case by case basis.

When estimating mortgage losses for a pool of residential mortgage assets originated in Italy, DBRS requests static pool performance data from each issuer requesting a rating. This data is expected to be representative of the asset pool that is to collateralise the proposed RMBS or covered bond programme. DBRS prefers data that is stratified by product type and/or by loan to value. If various vintages show markedly different performance relative to each other, DBRS assesses the reasons for such performance. For more details please refer to page 7.

Probability of Default Analysis

Benchmark Two-Year Probability of Default Estimate

DBRS calculates the benchmark two-year Probability of Default (PD) for each pool based on historical issuer specific data. The calculation of the two-year PD is typically weighted by the corresponding two-year PD for that particular year of origination. For example, if the origination vintages of a pool being analysed were evenly distributed across four years (for example 2004, 2005, 2006 and 2007), DBRS calculates the two-year PD for each vintage of historical data and apply the respective calculations to the vintage weighting.

Example:

	% of Pool	2-Yr PD
2004	25%	1.00%
2005	25%	1.50%
2006	25%	2.50%
2007	25%	3.00%
Estimated Pool Two-Year PD		2.00%

Mortgage Loan and Product Specific Default Penalties

Having established a two-year PD for a particular issuer, DBRS then applies borrower, mortgage loan and property characteristic specific default penalties to each loan to arrive at a base case two-year PD. The list of typical assumptions used when assessing default risk in Italian residential mortgages appears at the end of this addendum. The numbers presented are not prescriptive and the actual figures used may differ by transaction. The default penalties used for the analysis of Italian mortgages were validated by performance data outside of the jurisdiction. As a result, DBRS conducts additional analysis of issuer vintage performance data as a reasonableness check against the base case portfolio default rate. In cases where deemed necessary, DBRS adjusts the base case portfolio default rate accordingly. Disclosure of the assumptions used for each transaction is available on www.dbrs.com.

Mortgage Loan Characteristics

Loan-to-Value (LTV)

LTV is the ratio between the principal balance on the mortgage and the appraised value of the property serving as security for the loan itself. The input used by DBRS in the default model is the LTV at the time of securitisation (current balance over original valuation).

Subsidised Mortgages

Subsidised loans are rare in Italy. Notwithstanding this, DBRS considers loans granted on the basis of government subsidies or other forms of support as riskier compared with standard mortgage loans due to the intrinsic weaker profile of the borrower that such subsidies imply.

Loan Purpose

Increased default penalties are applied to loans where the loan is for debt consolidation of unsecured borrower debt. DBRS reviews underwriting procedures and product specifications to assess whether, in its opinion, a particular loan product has been used to fund lifestyle expenditures rather than to fund acquisition of residential property to inhabit.

Repayment Type

Interest only loans in Italy tend to be of a short term nature, typically five years or less, and a small percentage of total originations. The loans do not have the risk of a balloon payment at maturity, but are viewed as having more risk than a fully amortising loan due to the payment shock at the end of the interest-only period.

Loan Term

DBRS applies a penalty for loan terms that are longer than typically seen in the market and if the reason for such a long loan term is to arbitrage affordability assessments made at the underwriting stage. DBRS assumes that this is the case unless there is detailed credit rationale for longer than average loan terms.

Second Lien

DBRS applies penalties to second lien loans where it is of the opinion that the second lien is being utilised as a financing tool by the borrower to fund personal consumption rather than the purchase of the property.

Loan Product

DBRS applies risk adjustments to loan products where there is the potential risk of payment shock (i.e. a sharp increase in regular mortgage payments as a result of a change in the interest rate on the loan). Fixed rate (short term) loan products are seen to have the most potential for significant payment shock, as they do not adjust with increases in the base rate. If interest rates increase during the fixed period, the borrowers become exposed to a substantial increase in their regular mortgage payments at the time of the switch to standard floating rate. Loans that track the ongoing changes in interest rates over time are not subject to this risk adjustment.

Investment Properties

DBRS applies additional penalties to any loans that are not for residential owner occupation on the basis that the majority of default data for residential mortgages is based on owner occupation. The affordability of investment properties is based on rental income.

Credit Risk Layering

DBRS makes a base case PD adjustment to account for risk layering within a single mortgage loan; that is, the simultaneous presence of multiple risk factors is assumed to have an adverse effect on PD over and above that predicted by the single multiple associated with each component.

Simultaneous risk elements include combinations of high LTV (indicating minimal borrower down payments), past credit problems (e.g. prior arrears), and high loan to income (LTI) ratios and/or self-certification.

Flexible Loans

Flexible loans vary markedly in their features; however, are not common in Italy. Certain flexible loans allow payment holidays, others allow for the repayment of over-paid principal, while other types of flexible loans allow for the full re-draw back to a pre-defined limit. DBRS reviews the specific underwriting policies of the loans being analysed when assessing its opinion of the increased default risk associated with flexible loans.

Loans to Foreign Nationals

Loans to foreign nationals are also not commonly included in most Italian RMBS transactions. DBRS considers the treatment of foreign nationals for each transaction.

Borrower Characteristics and Credit Risk**Credit Risk Band and Adverse Credit History**

DBRS allocates each loan to a credit risk band. The allocation process is based upon a number of factors including:

- Any prior bankruptcy or the equivalent of the borrower.
- Historical and current arrears on the mortgages.

Depending on the data provided for each of the above factors, DBRS assigns each loan to a credit risk band which ranges from A-E. Credit risk band A is considered the best credit quality with E considered the worst credit quality. A successively higher default penalty is assigned to each successively higher credit risk band.

Self-Certification

DBRS applies additional penalties to loans where the borrower has not proven stated income levels. The penalty is applied on the basis that (in the absence of any checks) borrowers may be incentivised to overstate their income. DBRS also applies penalties to loans where the lender has elected not to check income levels.

Self Employed Borrowers

DBRS employs an additional default penalty to borrowers who are self-employed. DBRS analyses each issuer's underwriting policies with regards to income documentation for self-employed borrowers to determine if further penalties may be warranted as self-employed borrowers' monthly income stream tend to be unsteady.

Loan to Income (LTI)

DBRS applies penalties to certain loans where the borrower's affordability is considered in DBRS's opinion to be worse than the average. When assessing the application penalties for higher LTIs, DBRS assesses the income that the lender takes into account during the underwriting process. If income is not provided, DBRS assesses a borrower's income based on debt-to-income and other affordability metrics as described in the issuer's underwriting policies. For additional detail, please refer to pages 10-11.

Single Income

Loans advanced to only one borrower are subject to a higher default probability as obligors with two income streams tend to show better financial flexibility in periods of economic stress.

Loss Given Default

In DBRS's opinion, the most robust mortgage valuation is by means of a full internal and external inspection by a qualified valuer. The valuation needs to be sufficient to allow the underwriter a comparison of the property in question to that of other comparable recently sold properties. For other valuation methods, such as drive-by valuations, Automated Valuation Models, or desk top valuations, DBRS reduces the stated foreclosure value. The quantum of the valuation adjustment is calculated for each transaction and is based on DBRS assessment of the robustness of the validation procedures implemented by the particular lender.

Typical Market Value Declines

DBRS assumes the following market value declines (MVDs) to the appraised value (or the valuation, post any adjustment) for each rating level for Italian RMBS:

AAA	55.10%
AA (high)	53.60%
AA	52.00%
AA (low)	50.40%
A (high)	48.80%
A	47.30%
A (low)	45.70%
BBB (high)	44.10%
BBB	42.50%
BBB (low)	41.00%
BB (high)	39.40%
BB	37.80%
BB (low)	36.20%
B (high)	34.70%
B	33.10%

Costs of Foreclosure

DBRS will request lender-specific data on a transaction by transaction basis and will generate assumptions on costs of foreclosure based on the data received.

Foreclosure Timing

DBRS assumes that the typical time it takes to take possession of, sell and realise the cash from the sale of a residential property in Italy is 60 months from the point of first arrears. DBRS requests lender specific data on the time it takes to enact foreclosure proceedings and sell a property for each transaction to assess if a transaction specific adjustment is warranted.

Indexation

DBRS does not apply indexation to property values in its assessment of loss severity. Rather, DBRS applies the MVD assumptions to the appraised value (or the valuation, post any adjustment). For seasoned transactions where loans have experienced significant price appreciation or depreciation, DBRS may adjust property values on a case-by-case basis.

Appendix: Italian Loan-Level Risk Adjustments

Risk Characteristic	Characteristic Value	Base Multiple
Loan-to-Value	<=40	0.60
	50	0.80
	60	1.00
	70	1.30
	80	1.65
	90	2.10
	95	2.35
	100	2.65
	>=105	3.00
Loan Purpose	Debt/Equity Re-Mortgage	1.25
Repayment Type	IO	1.35
Loan Term	>25 Years	1.20
Second Lien	2nd Ranking Loan	1.50
Credit Risk Layering	LTV>=95 & Self Cert/High LTI	1.35
	LTV>=90 & Prior DQ	1.75
	LTV>=90 & Prior DQ & Self Cert/High LTI	1.85
Credit Risk Band	A	1.00
	B	1.00
	C	2.00
	D	4.00
	E	8.00
Employment/Income	Self-Certification (Employed)	1.75
	Self-Certification (Self-Employed)	1.35
	Self-Employed	1.15
	Loan-to-Income > 3.5	1.25
	Single Income	1.25

Irish Residential Mortgage Addendum

This addendum details the specific risks of Irish residential mortgages and DBRS analytical treatment of these risks when projecting default probability, loss given default and expected losses for such loans. The addendum can also be applied to the analysis of cover pools in covered bond transactions backed by residential loans in Ireland.

As noted in the master methodology, DBRS RMBS loss analysis is divided into two distinct segments. The first segment determines the probability of default of each underlying borrower, which is then aggregated to derive a pool level default probability. The second segment of the analysis derives the estimated loss given default of each mortgage followed by an aggregation to an overall pool level loss projection. The product of the default probability and loss given default gives the total expected losses for the pool. For details on DBRS methodology on European RMBS cash flow modelling, please refer to page 19 of the master methodology.

Set-Off Risk

There is the potential for set-off risk in Irish transactions in the case of insolvency of the originator. A borrower may invoke the right to set-off in respect of amounts due and payable to the borrower from the originator at the date of assignment of the loan to the issuer. DBRS requests an analysis of the amount of potential set-off for each transaction and makes adjustments to the loss analysis by transaction based on the estimated amount of potential set-off exposure. Please refer to the Irish addendum to *DBRS's Legal Criteria for Structured Finance Transactions* for further information.

Data Request

When estimating mortgage losses for a pool of residential mortgage assets originated in Ireland, DBRS requests static pool performance data from each issuer requesting a rating. This data is expected to be representative of the asset pool that is to collateralise the proposed residential mortgage-backed securitisation or covered bond programme. DBRS prefers data that is stratified by product type and/or by LTV. If various vintages show markedly different performance relative to each other, DBRS assesses the reasons for such performance. For more details, please refer to page 7 of the main report.

Probability of Default Analysis

In arriving at the overall expected probability of default (PD), DBRS may use one of the following approaches.

DBRS typically calculates the benchmark two-year PD for each pool based on historical originator-specific data. The calculation of the two-year PD is typically weighted by the corresponding origination volume for that particular year of origination. The two-year PD concentration for a particular transaction is calculated by DBRS using the loan-by-loan data tape, or by reference to portfolio level stratifications provided for a particular transaction. For example, if the origination vintages of a pool being analysed were evenly distributed across four years (for example 2004, 2005, 2006 and 2007), DBRS calculates the two-year PD for each vintage of historical data and applies the respective calculations to the vintage weighting.

Example:

	% of Pool	2-Yr PD
2004	25%	1.00%
2005	25%	1.50%
2006	25%	2.50%
2007	25%	3.00%
Estimated Pool two-Year PD		2.00%

In certain circumstances, however, DBRS may need to consider alternative approaches to adequately capture the likely future default performance of a loan portfolio.

Firstly, there may be evidence that elements of the portfolio to be securitised are likely to exhibit higher levels of distress than might be captured by the standard approach for determining a two-year PD described above. In those circumstances, DBRS may assume that loans that are 90 days plus in arrears and/or loans that have received some form of payment relief/modification will ultimately default, and that that default will occur in all rating scenarios. This assumption may be adjusted if DBRS is provided with data to allow an assessment of the likelihood of a return of loans in arrears to fully performing status or of the likely future

performance of modified loans. Where this approach is adopted, the remainder of the portfolio (i.e., those loans that are currently performing) are then analysed in the normal way, although where there is evidence that the better performance of the remainder of the portfolio is likely to be sustained, DBRS may reflect that performance by estimating the two-year PD accordingly.

Secondly, a given transaction may consist of a portfolio of originations originated in the period after the onset of the Irish banking crisis and at a time when lending criteria were tightened significantly or have otherwise benefitted from some form of positive selection. In such situations, performance data for loans originated under earlier lending criteria, or reflecting the overall characteristics of the originator's loan book, are likely to be less indicative of default performance for the portfolio going forward. In such circumstances, DBRS may adjust the two-year PD determined in relation to the originator's overall loan book to reflect the expected performance of loans originated under tighter underwriting criteria or selected by reference to particular eligibility criteria.

Mortgage Loan and Product-Specific Default Penalties

Having established a two-year PD for a particular transaction using one of the above approaches, DBRS then applies borrower, mortgage loan and property characteristics and specific default penalties to each loan to arrive at a base case two-year PD. The list of typical assumptions used when assessing default risk in Irish residential mortgages appears at the end of this addendum. The base case PD is converted into a base case lifetime portfolio default rate as described in the master methodology.

DBRS recognises that the severity and complexity of the crisis means that the dynamics of the housing market differ from area to area and from vintage to vintage. In addition, many of the default penalties used for the analysis of Irish mortgages were validated by performance data outside of the jurisdiction. Consequently, as a final step, DBRS considers whether the base case portfolio default rate estimated is a reasonable projection for the future performance of the relevant loan portfolio. In this regard, DBRS may consider the performance of comparable mortgage pools originated by the same originator, and, in appropriate cases, by other originators (in each case where necessary projected forward to provide a comparable lifetime assessment of portfolio performance).

Disclosure of the assumptions used for each transaction is made in the transaction press release and/or rating report, both of which are available at www.dbrs.com.

Mortgage Loan Characteristics

Loan-to-Value (LTV)

LTV is the ratio between the principal balance on the mortgage and the appraised value of the property serving as security for the loan itself. The input used by DBRS in the default model is the indexed LTV. Indexation is calculated using the House Price Index published by the CSO. The data is currently published monthly. In applying indexation, DBRS applies 100% of any downward indexation and, in order to factor in any dilapidations since the last physical valuation, 50% of any positive movement in indexation. DBRS applies its market value declines to the valuation post indexation.

Loan Purpose

Increased default penalties are applied to loans where the loan is for debt consolidation of non-secured lending. DBRS reviews underwriting procedures and product specifications to assess whether, in its opinion, a particular loan product has been used to fund lifestyle expenditures rather than to fund acquisition of residential property to inhabit.

Repayment Type

Interest-only loans in Ireland tend to be of a short-term nature, typically three years or less, and a small percentage of total originations. The loans have the risk of a balloon payment at maturity and, additionally, are viewed as having more risk than a fully amortising loan due to the payment shock at the end of the interest-only period.

The conversion of loans from repayment to interest-only is a tactic used by lenders to ease affordability pressures for borrowers who are in or are about to enter arrears. Although such arrangements are meant to be temporary in nature, DBRS applies interest-only penalties to such loans. Furthermore, DBRS will request details of loans that have been modified, the nature of modification and the date the modification was enacted, and apply penalties on a transaction-by-transaction basis.

Loan Term

DBRS applies a penalty for loan terms that are longer than typically seen in the market if it concludes that the reason for such a long loan term is to arbitrage affordability assessments made at the time of underwriting, unless the issuer provides a credit rationale for longer-than-average loan terms.

Second Lien

DBRS applies penalties to all second lien loans where it views the additional loan as a second charge rather than a further advance and the loan has a junior security position. Characteristics that may indicate that a loan is in character a second charge are the interest rate on the latest advance is higher than that of other previous advances, the loan term is shorter or the product is underwritten to materially different criteria to that of the earlier senior charge.

Loan Product

DBRS applies risk adjustments to loan products where there is the potential risk of payment shock (i.e., a sharp increase in regular mortgage payments as a result of a change in the interest rate on the loan). Fixed-rate (short-term) loan products are seen to have the most potential for significant payment shock, as they do not adjust with increases in the base rate. If interest rates increase during the fixed period, the borrowers become exposed to a substantial increase in their regular mortgage payments at the time of the switch to standard floating rate.

Residential Investment Properties

DBRS applies additional penalties to any loans that are not for residential owner occupation on the basis that it expects performance of investment properties to be inferior in terms of performance to residential properties in a stressed macroeconomic environment. DBRS believes that owning and managing a residential investment property/portfolio requires a borrower to have a higher degree of financial expertise and discipline than is required to own a single property for owner occupation. For example, a landlord has to deal with issues such as legislation, void periods and non-paying tenants. DBRS also expects that in times of significant stress, landlords would stop paying commitments on investment property mortgages prior to commitments on the house in which they reside.

Credit Risk Layering

DBRS makes a base case PD adjustment to account for risk layering within a single mortgage loan; that is, the simultaneous presence of multiple risk factors is assumed to have an adverse effect on PD over and above that predicted by the single multiple associated with each component.

Simultaneous risk elements include combinations of high LTV (indicating minimal borrower down payments), past credit problems (e.g., prior arrears) and high loan-to-income (LTI) ratios and/or self-certification.

Flexible Loans

Flexible loans are not common in Ireland. However, when encountered, they can vary markedly in their features. Certain flexible loans allow payment holidays, some allow for the repayment of overpaid principal, while other types of flexible loans allow for the full re-draw back to a pre-defined limit. DBRS reviews the specific underwriting policies of the loans being analysed when assessing its opinion of the increased default risk associated with flexible loans.

Loans to Foreign Nationals

Loans to foreign nationals are allowed under Irish law, although they tend not to be a material component of Irish RMBS transactions. DBRS believes that these types of loans pose greater risk, all other things being equal, than loans to established Irish nationals. This is because, firstly, the credit profile of the borrower may be lacking in detail or history relative to a borrower who has been established in the country for a longer period. Consequently, there is a possibility that, even if a less complete picture is compensated for in the origination process by factors such as lower LTV lending, that the risk, as measured by probability of default, is higher. In addition, DBRS believes that there is potential for foreign nationals to repatriate themselves in a situation where a property enters negative equity, thus leading to default. As the strength of the underwriting process is critical in mitigating risks associated with lending to foreign nationals, the scale of the penalty may vary by transaction.

Borrower Characteristics and Credit Risk

Credit Risk Band and Adverse Credit History

DBRS allocates each loan to a credit risk band. The allocation process is based upon a number of factors, including the following:

- Any prior bankruptcy or the equivalent.
- Historical and current arrears on the mortgages.

Depending on the data provided for each of the above factors, DBRS assigns each loan to a credit risk band ranging from A to E. Credit risk band A is considered the best credit quality, while E is considered the worst credit quality. A successively higher default penalty is assigned to each successively higher credit risk band.

Self-Certification

DBRS applies additional penalties to loans where the borrower has not proven stated income levels. The penalty is applied on the basis that (in the absence of any checks) borrowers may be incentivised to overstate their income. DBRS also applies penalties to loans where the lender has elected not to check income levels.

Self-Employed Borrowers

DBRS applies an additional default penalty to borrowers who are self-employed. DBRS analyses each issuer's underwriting policies with regards to income documentation for self-employed borrowers to determine if further penalties may be warranted as self-employed borrowers' monthly income streams tend to be more volatile than for those in employment.

Loan-to-Income (LTI)

DBRS applies penalties to certain loans where the borrower's affordability is considered in DBRS's opinion to be worse than the average. When assessing the application penalties for higher LTIs, DBRS assesses the income that the lender takes into account during the underwriting process. If details of income are not provided, DBRS assesses a borrower's income based on debt-to-income and other affordability metrics as described in the issuer's underwriting policies.

Single Income

Loans advanced to only one borrower are subject to an increase in default probability as obligors with two income streams tend to show more financial flexibility in periods of economic stress.

Regional Performance Variation

Based on data from the Central Bank of Ireland, DBRS observes that the arrears performance of the various regions in Ireland is not nationally consistent (i.e., certain areas contribute disproportionately to the overall level of mortgage arrears in Ireland relative to their contribution to overall mortgage lending in Ireland). Accordingly, DBRS makes adjustments to the default probability of loans from certain regions in Ireland. Please refer to the table on the following page.

Loss Given Default

In DBRS's opinion, the most robust mortgage valuation is by means of a full internal and external inspection by a qualified valuer, and this is the typical valuation that is undertaken in Ireland. The valuation needs to be sufficient to allow the underwriter a comparison of the property in question to that of other comparable recently sold properties. For other valuation methods, such as drive-by valuations, automated valuation models or desktop valuations, DBRS reduces the stated market value. The quantum of the valuation adjustment is calculated for each transaction and is based on DBRS's assessment of the robustness of the validation procedures implemented by the particular lender.

Typical Market Value Declines

DBRS assumes the following standard market value declines (MVDs) to the appraised value (or the valuation, post any adjustment) for each rating level for Irish RMBS:

	NON-DUBLIN	DUBLIN
AAA	71.06%	68.23%
AA (high)	63.15%	60.63%
AA	61.46%	59.00%
AA (low)	60.04%	57.65%
A (high)	58.07%	55.75%
A	56.51%	54.26%
A (low)	55.10%	52.90%
BBB (high)	52.56%	50.46%
BBB	49.73%	47.75%
BBB (low)	46.20%	44.35%
BB (high)	44.50%	42.73%
BB	41.68%	40.01%
BB (low)	39.28%	37.71%
B (high)	36.73%	35.27%
B	35.32%	33.91%

Costs of Foreclosure

DBRS requests lender-specific data for each transaction to assess an appropriate cost of foreclosure assumption.

Foreclosure Timing

Owing to the regulatory impetus to attempt to resolve mortgage arrears in a proactive manner and in a manner that is fair to the consumer, the arrears management process effectively becomes a bespoke process. Consequently, DBRS expects that the timeline from first arrears to foreclosure will vary from lender to lender.

The *Land and Conveyancing Law Reform Act 2013* was announced on 27 March 2013. The act is intended to remove the unintended legal consequences of the *Land and Conveyancing Law Reform Act 2009*, which repealed a number of statutory provisions applicable to mortgages, including provisions entitling lenders to seek summary possession of registered property where the borrower had defaulted on their mortgage. The issue was highlighted in the ruling of Justice Dunne in the *Start Mortgages Limited & Others v Gunn & Others* case, where it was held that where legal proceedings were launched by the lender after 1 December 2009 (the date of commencement of the 2009 act), the lender did not have the right to seek a summary possession order.

The *Land and Conveyancing Law Reform Act 2013* also includes provisions that will allow a court to adjourn repossession proceedings to see whether a Personal Insolvency Arrangement under the PIA would be a more appropriate solution to mortgage arrears.

Appendix: Irish Loan-Level Risk Adjustments

Table 1.1: Loan Level Risk Adjustments

Risk Characteristic	Characteristic Value	Base Multiple
Credit Risk Band	A	N/A
	B	1.00
	C	2.00
	D	4.00
	E	8.00
Loan-to-Value (LTV)	<=40	0.60
	50	0.80
	60	1.00
	70	1.30
	80	1.65
	90	2.10
	95	2.35
	100	2.65
	>=105	3.00
Employment/Income	Self-Certified Employed	1.75
	Self-Certified Self Employed	1.35
	Fast Track	1.10
	Loan-To-Income > 3.5	1.25
	Single Income	1.25
	Self Employed	1.15
Buy-to-Let	Yes	3.00
Right to Buy	Yes	1.10
Purpose	Debt/Equity Re-mortgage	1.25
Repayment Type	IO	1.35
Term	Repayment Loan > 25 yrs	1.20
Loan Size	Jumbo (Region Specific)	1.10
Second Lien	Second Ranking Loan	1.50
Loan Product	Tracker (For Life with Teaser)	1.05
	Tracker (Short Term)	1.05
	Discount (Short Term)	1.05
	Fixed (Short Term)	1.10
	Other	1.00
Regional-Specific Penalties	Region	
	Border	1.50
	Dublin	1.00
	Mid East	1.15
	Mid West	1.15
	Midlands	1.65
	South East	1.15
	South West	1.00
West	1.00	

Portuguese Residential Mortgage Addendum

This report details the specific risks of Portuguese residential mortgages and DBRS analytical treatment of these risks when projecting default probability, loss given default and expected losses for such loans. The addendum can also be applied to the analysis of cover pools in covered bond transactions backed by residential mortgage loans in Portugal.

As noted in the master methodology, DBRS residential mortgage-backed securities (RMBS) loss analysis is divided into two distinct segments. The first segment determines the probability of default of each underlying borrower which is then aggregated to derive a pool level default probability. The second segment of the analysis derives the estimated loss given default of each mortgage followed by an aggregation to an overall pool level loss projection. The product of the default probability and loss given default gives the total expected losses for the pool.

Data Request

When estimating mortgage losses for a pool of residential mortgage assets originated in Portugal, DBRS requests static pool performance data from each issuer requesting a rating. This data is expected to be representative of the asset pool that is to collateralise the proposed RMBS or covered bond programme. DBRS prefers data that is stratified by product type and/or by loan to value. If various vintages show markedly different performance relative to each other, DBRS assesses the reasons for such performance. For more details please refer to page 7.

Probability of Default Analysis

Benchmark Two-Year Probability of Default Estimate

DBRS calculates the benchmark two-year Probability of Default (PD) for each pool based on historical issuer specific data. The calculation of the two-year PD is typically weighted by the corresponding two-year PD for that particular year of origination. For example, if the origination vintages of a pool being analysed were evenly distributed across four years (for example 2004, 2005, 2006 and 2007), DBRS calculates the two-year PD for each vintage of historical data and applies the respective calculations to the vintage weighting.

Example:

	% of Pool	2-Yr PD
2004	25%	1.00%
2005	25%	1.50%
2006	25%	2.50%
2007	25%	3.00%
Estimated Pool Two-Year PD		2.00%

Mortgage Loan and Product Specific Default Penalties

Having established a two-year PD for a particular issuer, DBRS then applies borrower, mortgage loan and property characteristic specific default penalties to each loan to arrive at a base case two-year PD. The list of typical assumptions used when assessing default risk in Portuguese residential mortgages appears at the end of this addendum. The numbers presented are not prescriptive and the actual figures used may differ by transaction. The default penalties used for the analysis of Portuguese mortgages were validated by performance data outside of the jurisdiction. As a result, DBRS conducts additional analysis of issuer vintage performance data as a reasonableness check against the base case portfolio default rate. In cases where deemed necessary, DBRS adjusts the base case portfolio default rate accordingly. Disclosure of the assumptions used for each transaction is available on www.dbrs.com.

Mortgage Loan Characteristics

Loan-to-Value (LTV)

LTV is the ratio between the principal balance on the mortgage and the appraised value of the property serving as security for the loan itself. The input used by DBRS in the default model is the LTV at the time of securitisation (current balance over original valuation).

Subsidised Mortgages

Subsidised loans were granted by the Portuguese government up until 2002. Loans that had a subsidy prior to the end of the program were grandfathered and are still covered by the subsidy program. Notwithstanding this, DBRS considers loans granted on the basis of government subsidies or other forms of support as riskier compared with standard mortgage loans due to the intrinsic weaker profile of the borrower that such subsidies imply.

Loan Purpose

Increased default penalties are applied to loans where the loan is for debt consolidation of unsecured borrowed debt. DBRS reviews underwriting procedures and product specifications to assess whether, in its opinion, a particular loan product has been used to fund lifestyle expenditures rather than to fund acquisition of residential property to inhabit.

Repayment Type

Interest only loans in Portugal tend to be of a short term nature, typically three years or less, and a small percentage of total originations. The loans do not have the risk of a balloon payment at maturity, but are viewed as having more risk than a fully amortising loan due to the payment shock at the end of the interest-only period.

Loan Term

DBRS applies a penalty for loan terms that are longer than typically seen in the market if it concludes that the reason for such a long loan term is to arbitrage affordability assessments made at the underwriting stage. DBRS assumes that this is the case unless there is detailed credit rationale for longer than average loan terms.

Second Lien

DBRS applies penalties to second lien loans where it is of the opinion that the second lien is being utilised as a financing tool by the borrower for personal consumption rather than the purchase of the property.

Loan Product

DBRS applies risk adjustments to loan products where there is the potential risk of payment shock (i.e. a sharp increase in regular mortgage payments as a result of a change in the interest rate on the loan). Fixed rate (short term) loan products are seen to have the most potential for significant payment shock, as they do not adjust with increases in the base rate. If interest rates increase during the fixed period, the borrowers become exposed to a substantial increase in their regular mortgage payments at the time of the switch to standard floating rate. Loans that track the ongoing changes in interest rates over time are not subject to this risk adjustment.

Investment Properties

DBRS applies additional penalties to any loans that are not for residential owner occupation on the basis that the majority of default data for residential mortgages is based on owner occupation. The affordability of investment properties is based on rental income.

Credit Risk Layering

DBRS makes a base case PD adjustment to account for risk layering within a single mortgage loan; that is, the simultaneous presence of multiple risk factors is assumed to have an adverse effect on PD over and above that predicted by the single multiple associated with each component.

Simultaneous risk elements include combinations of high LTV (indicating minimal borrower down payments), past credit problems (e.g. prior arrears), and high loan to income (LTI) ratios and/or self-certification.

Flexible Loans

Flexible loans vary markedly in their features; however, they are not common in Portugal. Certain flexible loans allow payment holidays, others allow for the repayment of over-paid principal, while other types of flexible loans allow for the full re-draw back to a pre-defined limit. DBRS reviews the specific underwriting policies of the loans being analysed when assessing its opinion of the increased default risk associated with flexible loans.

Loans to Foreign Nationals

Loans to foreign nationals are allowed under Portuguese law and tend to be a small percentage of securitisation pools. DBRS considers the treatment of foreign nationals for each transaction.

Borrower Characteristics and Credit Risk

Credit Risk Band and Adverse Credit History

DBRS allocates each loan to a credit risk band. The allocation process is based upon a number of factors including:

- Any prior bankruptcy or the equivalent.
- Historical and current arrears on the mortgages.

Depending on the data provided for each of the above factors, DBRS assigns each loan to a credit risk band which ranges from A-E. Credit risk band A is considered the best credit quality with E considered the worst credit quality. A successively higher default penalty is assigned to each successively higher credit risk band.

Self-Certification

DBRS applies additional penalties to loans where the borrower has not proven stated income levels. The penalty is applied on the basis that (in the absence of any checks) borrowers may be incentivised to overstate their income. DBRS also applies penalties to loans where the lender has elected not to check income levels.

Self Employed Borrowers

DBRS employs an additional default penalty to borrowers who are self-employed. DBRS analyses each issuer's underwriting policies with regards to income documentation for self-employed borrowers to determine if further penalties may be warranted as self-employed borrowers' monthly income stream tend to be unsteady.

Loan to Income (LTI)

DBRS applies penalties to certain loans where the borrower's affordability is considered in DBRS opinion to be worse than the average. When assessing the application penalties for higher LTIs, DBRS assesses the income that the lender takes into account during the underwriting process. If income is not provided, DBRS assesses a borrower's income based on debt-to-income and other affordability metrics as described in the issuer's underwriting policies. For additional detail, please refer to pages 10 -11.

Single Income

Loans advanced to only one borrower are subject to an increase in default probability as obligors with two income streams tend to show more financial flexibility in periods of economic stress.

Loss Given Default

In DBRS opinion, the most robust mortgage valuation is by means of a full internal and external inspection by a qualified valuer. The valuation needs to be sufficient to allow the underwriter a comparison of the property in question to that of other comparable recently sold properties. For other valuation methods, such as drive-by valuations, Automated Valuation Models, or desk top valuations, DBRS reduces the stated foreclosure value. The quantum of the valuation adjustment is calculated for each transaction and is based on DBRS assessment of the robustness of the validation procedures implemented by the particular lender.

Typical Market Value Declines

DBRS assumes the following standard market value declines (MVDs) to the appraised value (or the valuation, post any adjustment) for each rating level for Portuguese RMBS:

AAA	55.30%
AA (high)	50.06%
AA	49.21%
AA (low)	48.57%
A (high)	47.53%
A	46.79%
A (low)	46.14%
BBB (high)	44.70%
BBB	43.06%
BBB (low)	40.91%
BB (high)	40.07%
BB	38.43%
BB (low)	37.09%
B (high)	35.64%
B	35.00%

Costs of Foreclosure

Standard costs of foreclosure in Portugal are assumed to be €2,500 and 3.0% of the post MVD value of the property. DBRS requests lender specific data for each transaction to assess if a different cost of foreclosure assumptions is appropriate.

Foreclosure Timing

DBRS assumes that the typical time it takes to take possession of, sell and realise the cash from the sale of residential a property in Portugal is 36 months from the point of first arrears. DBRS requests lender specific data on both the time it takes to enact foreclosure proceedings and sell a property and assesses if a transaction specific adjustment is warranted.

Indexation

DBRS does not apply indexation to property values in its assessment of loss severity. Rather, DBRS applies the MVD assumptions to the appraised value (or the valuation, post any adjustment). For seasoned transactions where loans have experienced significant price appreciation or depreciation, DBRS may adjust property values on a case by case basis.

Appendix: Portuguese Loan-Level Risk Adjustments

Risk Characteristic	Characteristic Value	Base Multiple
Loan-to-Value	<=40	0.60
	50	0.80
	60	1.00
	70	1.30
	80	1.65
	90	2.10
	95	2.35
	100	2.65
	>=105	3.00
Loan Purpose	Debt/Equity Re-Mortgage	1.25
Repayment Type	IO	1.35
Loan Term	>25 Years	1.20
Second Lien	2nd Ranking Loan	1.50
Credit Risk Layering	LTV>=95 & Self Cert/High LTI	1.35
	LTV>=90 & Prior DQ	1.75
	LTV>=90 & Prior DQ & Self Cert/High LTI	1.85
Credit Risk Band	A	1.00
	B	1.00
	C	2.00
	D	4.00
	E	8.00
Employment/Income	Self-Certification (Employed)	1.75
	Self-Certification (Self-Employed)	1.35
	Self-Employed	1.15
	Loan-to-Income > 3.5	1.25
	Single Income	1.25

Guidance for RMBS Resecuritisations in Europe

Resecuritisations can broadly be defined as the receipt of cash flows that are due from an underlying RMBS bond and the packaging of those cash flows into a new and separate special-purpose vehicle (SPV). The motivation to resecuritise typically arises when the transaction from which the underlying bond constitutes part of the capital structure has undergone a negative credit event. An example of this would include loss of a material counterparty or worse-than-expected asset or cash flow performance. Therefore, in an attempt to neutralise the negative credit impact on the underlying transaction, when the cash flows are transferred into the new SPV, it is typical that additional structural features or enhancements are added.

The analytical steps that DBRS uses in rating a resecuritisation are, at a summary level, similar to those that would be applied to rate a standard RMBS transaction; DBRS seeks to establish a portfolio-level PD and LGD and subsequently uses these as inputs to its cash flow modelling of the transaction structure.

The methodology covers transactions where a single RMBS bond is resecuritised into a new vehicle.

Part 1: Establishment of Portfolio-Level Expected Loss

The approach DBRS uses in attempting to establish its portfolio level PD, LGD and expected loss varies depending on which of the following scenarios apply:

Scenario 1: DBRS rates the underlying transaction.

Scenario 2: DBRS does not rate the underlying transaction but has access to sufficient loan-by-loan information in order to utilise its loan-by-loan European RMBS Credit Model.

Scenario 3: DBRS does not rate the transaction and does not have access to sufficient loan-by-loan data to run its loan-by-loan European RMBS Credit Model.

Scenario 1: DBRS rates the underlying transaction.

In such a scenario, DBRS would typically have access to loan-by-loan data, have detail of origination and servicing practices and, by virtue of its surveillance analysis on already rated transactions, be able to access management in order to discuss performance trends and transaction history. In this context, management may include, but is not limited to, some or all of the originator, servicer, administrator, transaction arranger, transaction manager and/or trustee. Consequently, in such a scenario, DBRS applies its standard European RMBS methodology (and the specific jurisdictional addenda) to such transactions to generate estimated cash flows in stressed rating scenarios.

Scenario 2: DBRS does not rate the underlying transaction but has access to sufficient loan-by-loan information in order to utilise its loan-by-loan European RMBS Credit Model.

Loan-by-loan data is increasingly becoming available to interested stakeholders in the European market. In a scenario where DBRS has access to loan-by-loan data, but where it does not rate the underlying transaction, there are a number of analytical steps that DBRS seeks to perform in order to conclude that it is appropriate to use that data in its rating analysis.

DBRS assesses whether the data is sufficient and accurate. In certain circumstances, the data made available to DBRS may be lacking material information that makes it, in the judgement of DBRS, inadequate to utilise the loan-by-loan data tape. The exact nature of what would cause DBRS to conclude that the data is not sufficient or robust would differ from transaction to transaction and may also differ by jurisdiction. However, the following is a non-exhaustive list of factors that may result in the loan-by-loan data tape being judged inappropriate:

- Missing origination, valuation or maturity dates.
- Missing property value.
- Missing current balance.
- Missing repayment type.
- Insufficient data to allow cash flows to be modelled (if cash flow modelling is necessary).

Furthermore, DBRS typically needs loan-by-loan data to be from the most recent payment date. DBRS also requires access to all investor reporting since the transaction's close.

DBRS does not have predefined MVD assumptions for any jurisdiction for European resecuritisations. However, the minimum MVDs that will be applied in any circumstance will be equal to the ones published in the relevant DBRS jurisdictional addendum to its European RMBS methodology. The exact quantum of the MVDs will vary depending on the data that DBRS receives relating to recoveries. However, as guidance, MVDs are expected to be 15% to 30% higher than the MVDs disclosed in the European RMBS methodology. DBRS may also use higher cost of sale and foreclosure timing assumptions than are detailed in its European RMBS methodology. The specific MVDs, costs of sale and foreclosure timing assumptions applied for a given transaction will be disclosed in the transaction's press release.

DBRS also reviews some or all of the following data sources:

- Aggregate transaction-level performance data for the underlying transaction.
- Aggregate transaction-level payment data for the underlying transaction.
- Proxy loan-by-loan data for similar transactions, which may include some or all of the following:
 - Month-by-month payment history for each loan.
 - Delinquencies tracked on a monthly or quarterly basis by cohorts for number of months delinquent.
 - Defaulted loans and definition of default.
- Foreclosure information on similar loans.
- The original prospectus/offering memorandum.

DBRS may conclude that the data is sufficient to be able to rate the transaction but that additional penalties or analytical overlay is warranted. DBRS discloses the details of any assumption made in this regard in any rating commentary, including press releases and rating reports.

If DBRS concludes that the loan-by-loan data available is not sufficient, then the approach envisaged in scenario three below may be considered to determine if the proposed transaction can be rated.

Scenario 3: Loan-by-loan data tape is not available.

Approach: DBRS devises “rep lines” that represent the portfolio characteristics and uses these rep lines in the relevant jurisdiction-specific European RMBS Credit Model.

Details of the Approach:

The ability of DBRS to rate a proposed transaction in the absence of loan-by-loan data will depend on the quality and sufficiency of available investor reports, in addition to the data sources described below. Investor reporting standards in Europe differ considerably, with both strong and weak examples in evidence in all countries. The type of information DBRS expects to see in investor reporting is discussed in further detail below.

DBRS typically expects the underlying transaction to have at least three to five years of investor reporting before it can rely on that information as a surrogate for loan-by-loan data on the underlying pool.

Examples of additional data sources that DBRS may use in its analysis include the following:

- Aggregate transaction-level performance data for the underlying transaction.
- Aggregate transaction-level payment data for the underlying transaction.
- Proxy loan-by-loan data for similar transactions, which may include some or all of the following:
 - Month-by-month payment history for each loan.
 - Delinquencies tracked on a monthly or quarterly basis by cohorts for number of months delinquent.
 - Defaulted loans and definition of default.
- Foreclosure information on similar loans.
- The original prospectus/offering memorandum.

In circumstances where DBRS concludes that it has sufficient data in order to estimate mortgage loss, the following approach is typically adopted.

Step 1 – Estimation of Portfolio Default Rate

The total lifetime projected default rate for the pool is calculated as follows:

Defaults to date + estimate of future defaults = Portfolio Default Rate.

Arrears Bucket

>=90 Days

All other loans

Assumed Roll Rate

100%

Calculated using DBRS Loan-by-Loan Mortgage Loan Analysis Model

A. 90 days plus in arrears

The average cure rate of loans that reach 90 days plus in arrears differs from lender to lender and from country to country. However, in the absence of loan-by-loan data for the loans that are being analysed for the purpose of rating a given transaction, DBRS assumes that all loans that are 90 days plus past due default (100% default rate).

B. Analysis of the performing pool and early stage delinquency pool

DBRS analyses the loan portfolio that is not 90 days in arrears by simulating the mortgage portfolio using the Master European Residential Mortgage-Backed Securities Rating Methodology and Jurisdictional Addenda. DBRS simulates the loan-by-loan data based on pool data available in investor reports. Consequently, DBRS typically expects the following fields to be reported in investor reports:

- Weighted-average (WA) current LTV
- Stratification of current LTV
- Stratification of original valuations or LTV
- WA origination date
- Stratification of origination dates
- WA maturity date
- Stratification of remaining term to maturity
- Stratification of repayment type
- Stratification of loans by interest rate type and index
- Stratification of loans by interest rate
- WA margin of the pool
- Percentage of loans zero to one months in arrears or percentage of loans zero to two months in arrears
- Percentage of loans one to two months in arrears
- Percentage of loans two to three months in arrears
- Percentage of loans to self-employed borrowers
- Percentage of right to buy loans (for U.K. loan pools)
- Percentage of loans that are buy-to-let
- Percentage of loans that are owner occupied
- Percentage of loans that are self-certified
- Percentage of loans that are income verified
- Percentage of loans that are flexible (if any)
- Data that allows DBRS to either confirm that there are no second mortgages/junior liens, or to determine the impact of those second mortgages/junior liens

Simulating the underlying pool inevitably means that the analysis lacks a level of detail compared to the analysis if loan-by-loan data was available. To compensate for this, DBRS may make adjustments to the loan pool with the nature and materiality of the adjustments varying based on the detail that is contained within the investor reports and the loan characteristics of the underlying pool. Each transaction's press release and presale report/rating report will contain details of the adjustments and the rationales for the adjustments made.

If data is not available on a given field, DBRS assesses the overall quality and sufficiency of data and may use worst-case assumptions for a given field.

In accordance with its European RMBS methodology, DBRS makes an assessment of the two-year default probability of the loans that are not reported as 90 days plus in arrears. This analysis considers the performance of the transaction in question and also performance by other transactions by the same originator, in addition to performance of the wider market.

Step 3 - Estimation of Loss Given Default

As mentioned above, DBRS does not have predefined MVDs for any jurisdiction for European resecuritisations. However, the minimum MVDs that will be applied in any circumstance will be equal to the ones published in the relevant DBRS jurisdictional addendum to its European RMBS methodology. The exact quantum of the MVDs will vary depending on the data that DBRS receives in relation to the following:

- i. Type of valuation (surveyor, drive by, indexation, etc.)
- ii. Quality and oversight of the valuation process
- iii. The property types in the portfolio
- iv. Exposure to illiquid properties (higher and lower-value properties)
- v. The servicing procedures and their impact on the forced sale adjustment

However, as guidance, MVDs are expected to be around 15% to 30% higher than the MVDs disclosed in the European RMBS methodology. The specific MVDs applied for a given transaction will be disclosed in the transaction's press release.

Costs of Foreclosure

Costs of foreclosure assumptions for European RMBS resecuritisation transactions are derived on a transaction-by-transaction basis using DBRS knowledge of the specific markets. Those assumptions are disclosed in rating commentary.

Foreclosure Timing

Time to foreclosure assumptions for European RMBS resecuritisations are also derived on a transaction-by-transaction basis, again using DBRS knowledge of the specific markets. Those assumptions are disclosed in rating commentary.

Part 2 – Cash Flow Modelling of the Underlying Transaction

From the analysis explained in Part 1, DBRS arrives at a Portfolio Default Rate and an LGD expectation for each rating level. Following this part of the rating analysis, DBRS typically performs cash flow modelling of the underlying RMBS transaction using the standard stresses explained in the main body of the *DBRS Master European Residential Mortgage-Backed Securities Rating Methodology and Jurisdictional Addenda* and the *Interest Rate Stresses for European Structured Finance Transactions* methodology. This analysis produces cash flow estimates (split between principal and interest) for at least 12 stressed scenarios per rating category on each payment date for the underlying bonds. These cash flows would then form the input to the cash flow modelling for the resecuritisation vehicle.

Scenario	Prepayments	Default Timing	Interest Rate
1	Slow	Front-loaded	Upward
2	Mid	Front-loaded	Upward
3	Fast	Front-loaded	Upward
4	Slow	Back-loaded	Upward
5	Mid	Back-loaded	Upward
6	Fast	Back-loaded	Upward
7	Slow	Front-loaded	Downward
8	Mid	Front-loaded	Downward
9	Fast	Front-loaded	Downward
10	Slow	Back-loaded	Downward
11	Mid	Back-loaded	Downward
12	Fast	Back-loaded	Downward

Note that depending on the seasoning or other features of the underlying transaction, default timing curves and/or prepayment scenarios may be altered. Full disclosure will be given in any rating commentary.

Part 3 – Cash Flow Modelling of the Resecuritisation.

DBRS envisages two possible cash flow structures for resecuritised transactions:

- A pass-through structure with no specified interest coupon for the resecuritised notes.
- Structures where the rated resecuritisation note has a predefined coupon/index/margin.

A. A pass-through structure with no specified interest coupon.

In this structure, the liabilities issued by the resecuritisation vehicle typically comprise a senior and a junior note. The currency of the underlying bond and the resecuritisation note match. The senior note in this structure may not have an interest rate index reference or a margin, and in any event, interest is limited to whatever amounts are actually received from the underlying bond.

When rating a structure of this nature, DBRS is assessing the ability of the transaction to make full principal payment by the legal final maturity date of the transaction. The DBRS rating does not provide an opinion on the timeliness or amount of interest payments the investor may receive.

Chart 1: Structure of the Underlying Transaction

Transaction XYZ Underlying Transaction	
Class A	£50,000,000.00
Class B	£10,000,000.00

Bond to be Resecuritised

Bond to be Resecuritised
30,000,000 of Class A of XYZ Transaction

Structure of Resecuritisation Vehicle

Resecuritisation	Size	Coupon	CE	Rating
Class A	15,000,000	None	50%	AAA (sf)
Class B	15,000,000	None	Nil	NR

As the rating in the example above addresses ultimate payment of principal only, and as there is no currency risk, there is a separate interest and principal waterfall and no possibility of either principal being used to pay interest or of pro-rata amortisation of the bonds in the underlying transaction, then cash flow modelling may not be necessary.

In transactions where the underlying note has a combined waterfall, where principal can be used to pay interest or where pro-rata amortisation is possible, DBRS performs a cash flow analysis of the underlying transaction.

B. Structures where the rated resecuritisation note has a predefined coupon/index/margin.

In such cases, the underlying transaction is always cash flow modelled. In addition, if the cash flows of the resecuritisation note do not precisely match the cash flows from the underlying bond, it is necessary to model those cash flows as well.

Chart 1: Structure of the Underlying Transaction

Transaction XYZ Underlying Transaction	
Class A	£50,000,000.00
Class B	£10,000,000.00

Bond to be Resecuritized

Bond to be Resecuritized
30,000,000 of Class A of XYZ Transaction

Resecuritisation Structure**Resecuritisation**

	Size	Coupon (Example)	CE	Rating
Class A	£15,000,000.00	3 Month Euribor plus [xx] bps	50%	AAA (sf)
Class B	£3,000,000.00	3 Month Euribor plus [xx] bps	40%	A (sf)
Class C	£3,000,000.00	3 Month Euribor plus [xx] bps	30%	BBB (sf)
Class D	£9,000,000.00	3 Month Euribor plus [xx] bps	0%	NR

The outcome of the analysis undertaken in Part 2 forms the basis of the cash flow analysis of the new resecuritisation vehicle.

Estimates of cash flows are generated for the bond to be resecuritized in each of the ratings scenarios contemplated (AAA to B). These then form the basis of the cash flow analysis for the resecuritized vehicle. As the stress scenarios already factor in interest rate stresses, and payments on the underlying bond are contractual in scenarios where there is no residual interest rate risk or timing mismatch, no further stresses are applied to the income from the underlying assets when modelling the cash flows of the resecuritisation vehicle.

DBRS runs standard interest rate stresses as described in the *Interest Rate Stresses for European Structured Finance Transactions* methodology on the liability cash flows of the resecuritisation vehicle. DBRS also tests any additional enhancements introduced to support the notes intended to be rated in the resecuritisation vehicle (e.g., reserve funds and liquidity facilities).

Depending on the structure and hedging arrangements, DBRS may run additional stresses, which are disclosed in each transaction's press release and presale/rating report.

Counterparty Risk

As highlighted above, it is possible that the RMBS cash flows that are being securitized into the new transaction are derived from transactions that are not rated by DBRS. Consequently, in such scenarios, the transaction documents of the underlying transaction will not reference DBRS ratings of the counterparty providers. Transaction documentation may attempt to mitigate counterparty risk in various ways. DBRS assesses the structural mitigants that exist in each of the underlying transactions when analysing the counterparty risk in the resecuritisation vehicle.

Transaction Documentation

DBRS reviews the transaction documentation for the resecuritisation vehicle in light of its *Legal Criteria for European Structured Finance Transactions* methodology.

In addition, DBRS expects to receive sufficient transaction documentation with respect to the underlying transaction to allow it to analyse the compliance of that transaction with its *Legal Criteria for European Structured Finance Transactions* methodology. If sufficient information is not available to enable that analysis to be completed, DBRS may be unable to assign a rating to the transaction.

In addition to collateral data, DBRS also requires sufficient details of the mechanics of any hedging arrangements to allow the hedging to be modelled.



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