



DEUTSCHER VERBRIEFUNGSSTANDARD and STS

High quality securitisation is a key component of well-functioning financial markets. This is and has been the credo of TSI since its foundation in early 2004.

All those years TSI has provided the market for high-quality securitisations with the quality brand CERTIFIED BY TSI – DEUTSCHER VERBRIEFUNGSSTANDARD. From the very beginning, high transparency, disclosure, detailed requirements for lending and credit processing have been the core of the TSI certificate. And not least the financial crisis of 2008 showed how important these requirements are for the securitisation market. As TSI, we therefore welcome the new European STS regulations.

On 12 December 2017, the EU adopted a new regulatory framework for simple, transparent and standardised securitisations, which will apply from 1 January 2019. The new regulations underline in the best possible way how up-to-date the TSI certification was already in 2004. In essence, almost all the new STS requirements were already included in the DEUTSCHER VERBRIEFUNGSSTANDARD, and for some criteria the TSI certification was and is even more extensive and precise than the new European regulation.

However, the approaching first-time application of the new legal requirements is a good reason to revise the DEUTSCHER VERBRIEFUNGSSTANDARD in order to ensure that all aspects of the new regulations as laid down in the Regulation and the accompanying Level 2 and Level 3 regulations are henceforth also taken into account accordingly in the TSI quality label.

Declaration of undertaking by the mandator forming part of the TSI certification process

We, the undersigned

Mandator

FCA BANK Deutschland GmbH

undertake to comply with all details of this declaration of undertaking for the entire term of the securitisation transaction

Transaction

A-BEST 16

The transaction for which the certificate DEUTSCHER VERBRIEFUNGSSTANDARD is applied for is a securitisation transaction within the meaning of Article 2 of the REGULATION (EU) 2017/2402 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 December 2017 laying down a general framework for securitisation and creating a specific framework for simple, transparent and standardised securitisation, and amending Directives 2009/65/EC, 2009/138/EC and 2011/61/EU and Regulations (EC) No 1060/2009 and (EU) No 648/2012 – hereinafter referred to as “Securitisation Regulation”. If changes occur with regard to the fulfilment of individual criteria, we will inform True Sale International GmbH thereof without undue delay.

The “General Conditions of Certification”, including the annexes, of True Sale International GmbH, as published on the True Sale International GmbH website (www.tsi-gmbh.de), shall apply. True Sale International GmbH will not carry out any initial or ongoing verification of the information given in this declaration of undertaking.

On the basis of TSI’s interpretation of the Securitisation Regulation as of 12 December 2017 the STS requirements are incorporated in TSI’s DEUTSCHER VERBRIEFUNGSSTANDARD requirements for EU securitisation transactions with car financing receivables as underlying. The originator confirms with this declaration of undertaking that the transaction complies with all given requirements to its best knowledge. TSI has checked and verified the originator’s statements on the basis of the offering circular and further material provided by the originator, such as the articles of association of the SSPE or a sample of the future investor reporting.

The TSI certification is **not** a third party verification according to article 28 of the Securitisation Regulation. Neither is the originator able to give a final STS notification in accordance to Article 27 of the Securitisation Regulation as far as the Regulatory Technical Standards and Guidelines of EBA and ESMA are not yet finally approved by the EU Commission. But TSI has considered as much as possible all general requirements (Chapter 1 to 3 of the Regulation) as well as the STS requirements for ABS-transactions contained in Chapter 4 of the Securitisation Regulation.



Reference data

Transaction name

A-BEST 16

Name of the SPV

Asset-Backed European Securitisation Transaction Sixteen UG

Originator

FCA BANK Deutschland GmbH

Country of origin of asset pool

Germany

Servicer

FCA BANK Deutschland GmbH

Joint Lead Manager

CA-CIB, LBBW; BAML

Bookrunner

CA-CIB Milan Branch; LBBW; BAML

Legal Counsel

JONES DAY

Corporate services provider

TMF DEUTSCHLAND AG

Closing date

03.12.2018

Volume per tranche in EUR million

Class A 540; Class B 18; Class C 20; Class D 16; Class E 11; Class M 26,6

Term

Final Maturity: Dezember 2028

Rating

S&P and Moody's

Stock exchange

Luxemburg

Portfolio structure

Static

Revolving

Asset class

Auto loans

Securitisation structure

True Sale

Synthetic

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General quality criteria

No Quality criterion

Criterion fulfilled

Reference to the Regulation*

Prospectus / reference

Comments

Overriding criteria

1 Assurance is given, that either the seller is the original lender of the pool of receivables to be securitised or the original lender is part of the respective group in which the pool of receivables was originated and the sale is part of the ordinary business procedures.

Yes
 No
 n. a.**

Exclusion from Article 9 (3.) and Article 20 (4.)

Pool Eligibility Criteria (x)

continued on page 29

2 Assurance is given that the portfolio to be securitised contains no securitisation positions of other securitisation transactions (prohibition of re-securitisations).

Yes
 No
 n. a.

Article 8 and Article 20 (9.)

Definition of receivables

continued on page 29

3 In connection with the SSPE involved in the transaction assurance is given that the SSPE is established in a member state of the European Union.

Yes
 No
 n. a.

Article 4 Article 18

THE PARTIES - THE ISSUER

continued on page 29

*Securitisation Regulation

**not applicable

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments																
4	Assurance is given that the originator is established in a member state of the European Union and all the credits giving rise to the underlying exposures were granted in accordance with Article 9 (1) of the Securitisation Regulation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 18 and Article 9 (1)	THE PARTIES - THE ORIGINATOR																	
5	Assurance is given that the originator retains on an ongoing basis a material net economic interest in accordance with Article 6 of the Securitisation Regulation. The risk retention is disclosed to the institutional investor in accordance with Article 5 of the Securitisation Regulation including information on which of the following modalities provided for in Article 6(3) of the Securitisation Regulation has been applied:	<table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> <td>n. a.</td> </tr> <tr> <td>- the retention of not less than 5 % of the nominal value of each of the tranches sold or transferred to investors;</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>- in the case of revolving securitisations or securitisations of revolving exposures, the retention of the originator's interest of not less than 5 % of the nominal value of each of the securitised exposures;</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>- the retention of randomly selected exposures, equivalent to not less than 5 % of the nominal value of the securitised exposures, where such non-securitised exposures would otherwise have been securitised in the securitisation, provided that the number of potentially securitised exposures is not less than 100 at origination;</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		Yes	No	n. a.	- the retention of not less than 5 % of the nominal value of each of the tranches sold or transferred to investors;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	- in the case of revolving securitisations or securitisations of revolving exposures, the retention of the originator's interest of not less than 5 % of the nominal value of each of the securitised exposures;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	- the retention of randomly selected exposures, equivalent to not less than 5 % of the nominal value of the securitised exposures, where such non-securitised exposures would otherwise have been securitised in the securitisation, provided that the number of potentially securitised exposures is not less than 100 at origination;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 6 Article 21 (1.)	RETENTION OF NET ECONOMIC INTEREST, Paragraph 1.a	(a) it will acquire on the Closing Date and, thereafter on an on-going basis for the life of the Transaction, hold a material net economic interest of not less than 5 per cent. of the initial Note Principal Amount of each of the Class A Notes, the Class B Notes, the Class C Notes, the Class D Notes, the Class E Notes and the Class M Notes (the "Retained Notes"), representing the nominal value of each of the tranches sold or transferred
	Yes	No	n. a.																		
- the retention of not less than 5 % of the nominal value of each of the tranches sold or transferred to investors;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																		
- in the case of revolving securitisations or securitisations of revolving exposures, the retention of the originator's interest of not less than 5 % of the nominal value of each of the securitised exposures;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																		
- the retention of randomly selected exposures, equivalent to not less than 5 % of the nominal value of the securitised exposures, where such non-securitised exposures would otherwise have been securitised in the securitisation, provided that the number of potentially securitised exposures is not less than 100 at origination;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																		

continued on page 29

continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled			Reference to the Regulation	Prospectus / reference	Comments
		Yes	No	n. a.			
5	continued from page 6						
	<ul style="list-style-type: none"> the retention of the first loss tranche and, where such retention does not amount to 5% of the nominal value of the securitised exposures, if necessary, other tranches having the same or a more severe risk profile than those transferred or sold to investors and not maturing any earlier than those transferred or sold to investors, so that the retention equals in total not less than 5% of the nominal value of the securitised exposures; or the retention of a first loss exposure of not less than 5% of every securitised exposure in the securitisation. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/> continued on page 29
6	Assurance is given that the following criteria listed below are fulfilled:				TSI criterion		
	<ul style="list-style-type: none"> no active management of the assets, non-petition, limited recourse is ensured in the transaction structure, the annual audit of the issuer will be made by a reputable audit company. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recital 25 and Article 20 (7.)	THE ISSUER - Paragraph 1 RISK FACTORS - Paragraph 1.1.1 THE ISSUER-par 6	please see also OVERVIEW OF FURTHER TRANSACTION DOCUMENTS -> 2 The Servicing Agreement
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 2 (1.) and Article 2 (2.)		
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/> continued on page 29
7	The securitisation positions is not intended to be offered or transferred to retail clients.	<input checked="" type="checkbox"/>	Yes		Article 3	Introduction of the Prospectus - 2 PROHIBITION OF SALES TO EEA RETAIL INVESTORS	
		<input type="checkbox"/>	No				
		<input type="checkbox"/>	n. a.				
		<input type="checkbox"/>					<input type="checkbox"/> continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
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Transparency for institutional investors

8 Assurance is given that prior to holding a securitisation position, all necessary information for due diligence requirements for institutional investors in accordance with Article 5.1 to Article 5.5, Article 7.1 (b) and Article 22 of the Securitisation Regulation will be made available.

Yes
 No
 n. a.

Article 5.1 to Article 5.5 and Article 7.1 (b) and Article 22

RISKS RELATING TO THE REGULATORY TREATMENT OF THE NOTES - par 8.3.2

continued on page 29

9 Assurance is given that the Prospectus pursuant to Directive 2003/71/EC of the European Parliament and the Council or final offering document will contain the relevant information that institutional investors are required to verify prior to holding a securitisation position:

Yes No n. a.

Article 7 (1.)

Introduction of the Prospectus - RISK FACTORS Transaction Summary (Overview)

- the structural features of the securitisation that can materially impact the performance of the securitisation position, including the contractual priorities of payment and priority of payment-related triggers, credit enhancements, liquidity enhancements, market value triggers, and transaction-specific definitions of default

Article 5 (3.)(b)

In addition, assurance is given that the following information will be made available to institutional investors prior to holding a securitisation position:

Article 5 (3.)(a)

RISK FACTORS Description of Portfolio

continued on page 9

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General quality criteria

No	Quality criterion	Criterion fulfilled			Reference to the Regulation	Prospectus / reference	Comments
		Yes	No	n. a.			
9	continued from page 8 <ul style="list-style-type: none"> the underwriting and appraisal of creditworthiness standards for the underlying exposures including standards for amending, renewing and re-financing; the detailed STS notification referred to in Article 27 and the corresponding RTS [Name of RTS]. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 5 (1.)(a)-(b) Article 5(3.)(c)	COLLECTION POLICY - sts notification missing	<input type="checkbox"/> continued on page 29
10	Assurance is given that the preliminary prospectus (or "red herring" prospectus) or the preliminary final document will be prepared and presented to the investors concerned no later than two weeks before the closing date. The preliminary prospectus or the preliminary final document contains all essential data required for the evaluation of the transaction including historical data no shorter than five years on default and loss performance, delinquencies for substantially similar exposures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TSI criterion Article 5 (3.) Article 22 (1.) Article 22 (5.) Article (7) (1.)	HISTORICAL PERFORMANCE DATA	preliminary prospectus will be prepared and presented to the investors concerned no later than two weeks. <input type="checkbox"/> continued on page 29
11	Assurance is given that the originator will, before the pricing of the securitisation, make available to potential investors a liability cash flow model which precisely represents the contractual relationship between the underlying exposures and the payments flowing between the originator, sponsor, investors, other third parties and the SSPE, and that he has to, after pricing, make that model available to investors on an ongoing basis and to potential investors upon request.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Article 22 (3.)		Availabe via Bloomberg and Intex <input type="checkbox"/> continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled			Reference to the Regulation	Prospectus / reference	Comments
		Yes	No	n. a.			
12	Assurance is given, that the Transparency requirements for originators and SSPE's according to Article 7 of the Securitisation Regulation will be fulfilled and at least the following information will be made available:				Article 7 and Article 22 TSI Criterion	12 AVAILABILITY OF DOCUMENTS 13 LOAN-LEVEL DATA REPORTING	personal data are encrypted.
-	Investor report: The structure of the investor report follows the reporting standards and definitions of True Sale International GmbH for the asset class in question; these standards are published on the True Sale International GmbH website (www.tsi-gmbh.de);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
-	anonymised Loan level Data in such a manner as may be required to comply with the Eurosystem eligibility criteria of the Guideline (EU) 2015/510 of the European Central Bank of 19 December 2014 on the implementation of the Eurosystem monetary policy framework (ECB/2014/60), subject to applicable data protection laws (insert details in the "comments" field);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
-	final offering document or the prospectus or transaction summary together with the closing transaction documents (asset sale agreement, assignment, novation or transfer agreement and any relevant declaration of trust);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
-	the derivatives and guarantees agreements and any relevant documents on collateralisation arrangements, where applicable;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			intended to be made available from January 2019 onwards
-	the servicing, back-up servicing, administration and cash management agreements;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			intended to be made available from January 2019 onwards
-	the trust deed, security deed, agency agreement, account bank agreement;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			intended to be made available from January 2019 onwards
-	guaranteed investment contract, incorporated terms or master trust framework or master definitions agreement or such legal documentation with equivalent legal value;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			intended to be made available from January 2019 onwards
continued on page 11							
<input type="checkbox"/> continued on page 29							

General quality criteria

No	Quality criterion	Criterion fulfilled			Reference to the Regulation	Prospectus / reference	Comments
		Yes	No	n. a.			
12	continued from page 10 <ul style="list-style-type: none"> any relevant inter-creditor agreements, derivatives documentation, subordinated loan agreements, start-up loan agreements and liquidity facility agreements; the detailed STS notification referred to in Article 27 and the corresponding draft RTS and ITS on STS Notification under Regulation [EU] N° 2017/2402. <p>In addition, the final offering document or the prospectus or transaction summary together with the closing transaction documents as well as the detailed STS notification shall be made available before pricing.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Article 7 (1.)		intended to be made available from January 2019 onwards
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
13	Assurance is given that during the term of a transaction, the originator or SSPE will make available without undue delay any significant event such as <ul style="list-style-type: none"> any inside information relating to the securitisation that the originator, sponsor or SSPE is obliged to make public in accordance with Article 17 of Regulation (EU) No 596/2014; name and address of the securitisation repository where the information is made available; the evolution of the ratings of the relevant transaction parties. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 7 (1.) (f)	introduction in the prospectus (ref to the "Benchmark Regulation") Investor Report	intended to be made available from January 2019 onwards
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Article 7 (2.)		
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TSI criterion		

continued on page 29

continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments												
14	We give our assurance that at least the following information will be provided to True Sale International GmbH for publication on its publicly accessible website: <ul style="list-style-type: none"> – the final version of the issue prospectus; – the investor report, which shall be published at least once a quarter, in PDF format and in write-protected xls format; – declaration of undertaking by the Mandator as part of the TSI certification process. 	<table border="1"> <thead> <tr> <th>Yes</th> <th>No</th> <th>n. a.</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </tbody> </table>	Yes	No	n. a.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TSI Criterion		
Yes	No	n. a.															
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>															
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>															
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>															

continued on page 29

Quality Criteria in regard to the underlying

15	Assurance is given, that the originator applies to exposures to be securitised the same sound and well-defined criteria for credit-granting which they apply to non-securitised exposures. To this end the same clearly established processes for approving and, where relevant, amending, renewing and re-financing credits are applied. The Originator has effective systems in place to apply those criteria and processes in order to ensure that credit-granting is based on a thorough assessment of the obligor's creditworthiness taking appropriate account of factors relevant to verifying the prospect of the obligor to meet his obligations under the credit agreement.	<table border="1"> <tbody> <tr> <td><input checked="" type="checkbox"/></td> <td>Yes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>No</td> </tr> <tr> <td><input type="checkbox"/></td> <td>n. a.</td> </tr> </tbody> </table>	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	n. a.	Article 9 Article 20 (10.)	COLLECTION POLICY	
<input checked="" type="checkbox"/>	Yes										
<input type="checkbox"/>	No										
<input type="checkbox"/>	n. a.										

continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
16	The securitised loans have all been granted in the context of standard business activities (balance-sheet transactions). Assurance is given that the servicer has expertise in servicing exposures of similar nature to those securitized and the servicer has well documented and adequate policies, procedures and risk management controls relating to the servicing of exposures.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion Article 9 Article 21 (8.)	Pool Eligibility Criteria (x) - Servicing Agreement	<p><input type="checkbox"/> continued on page 29</p>
17	Assurance is given that the portfolio to be securitised does not contain loans which are granted on the basis of divergent lending standards, approval procedures and incentive measures so that they can be transferred directly to the capital market by means of securitisation (originate-to-distribute model).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion Article 9 Article 20(10.)	Eligibility Criteria (I) (x)	<p><input type="checkbox"/> continued on page 29</p>
18	Assurance is given that an appropriate and independent third party has checked the underlying asset pool by means of random sampling for conformity (confidence level of at least 95 %) with the defined selection criteria (pool audit).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 22 (2.)		<p>-> the following audits were done by Zenith Service S.p.A. in Milan: a) portfolio pool audit b) portfolio stratification tables and WAL of the Senior Notes</p> <p><input type="checkbox"/> continued on page 29</p>

General quality criteria

No	Quality criterion	Criterion fulfilled			Reference to the Regulation	Prospectus / reference	Comments
		Yes	No	n. a.			
19	The underlying exposures, at the time of selection, do not include exposures in default within the meaning of Article 178(1) of Regulation (EU) No 575/2013 or exposures to a credit-impaired debtor or guarantor, who, to the best knowledge of the originator:				Article 20 (11.)	Eligibility Criteria (y)	
	- has been declared insolvent;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	- had a court grant his creditors a final non-appealable right of enforcement;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	- had material damages as a result of a missed payment within three years prior to the date of origination;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	- has undergone a debt-restructuring process with regard to his non-performing exposures within three years prior to the date of transfer or assignment of the underlying exposures to the SSPE;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	- was, at the time of origination, where applicable, on a public credit registry of persons with adverse credit history or, where there is no such public credit registry, another credit registry that is available to the originator or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	- has a credit assessment or a credit score indicating that the risk of contractually agreed payments not be made is significantly higher than for comparable exposures held by the originator which are not securitized.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 20 (11.) (c)		
20	Assurance is given that the debtors have at the time of transfer of the exposures, made at least one payment, except in the case of revolving securitisations backed by exposures payable in a single instalment or having a maturity of less than one year, including without limitation monthly payments on revolving credits.	<input checked="" type="checkbox"/>	Yes		Article 20 (12.)	Eligibility Criteria (d)	
		<input type="checkbox"/>	No				
		<input type="checkbox"/>	n. a.				

continued on page 29

continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
21	Assurance is given that, in granting the loan and loan processing, securitised and unsecuritised loans are subject to the same supervisory standards.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion	as summarized in Prospectus RPA; Servicing Agreement;	For criteria from 21 to 26 we assure that all loans receive the same treatment. Collections and operations department cannot know if a contract is securitised or not. Information is segregated and only available to securitization team. <input type="checkbox"/> continued on page 29
22	With regarding to lending, assurance is given that no divergent target agreement, marketing control measures or bonus systems are applied to securitised or unsecuritised loans.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion		<input type="checkbox"/> continued on page 29
23	Assurance is given that the same guidelines and competence matrices as well as the same structural integration of decision-makers in the organisational hierarchy apply to both securitised and unsecuritised loans.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion	Prospectus: Collection Policy	<input type="checkbox"/> continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
24	Assurance is given that securitised and unsecuritised loans are not subject to divergent treatment in internal audits.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion	Prospectus: Collection Policy	<input type="checkbox"/> continued on page 29
25	Assurance is given that securitised and unsecuritised loans are not subject to systematic differences with regard to the business structure, the marketing channels used and the type of loan.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion	Prospectus: Collection Policy	<input type="checkbox"/> continued on page 29
26	Assurance is given that loan servicing, including after securitisation of the loan, will remain in the originator's area of responsibility and will continue to be subject to the general servicing standards applicable within the company. Servicing covers monitoring, collection and administration. Assurance is hereby given that in the case of management by our company or outsourcing, the same servicing standards have to apply to both securitised and unsecuritised loans.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion Article 21 (8.)	Prospectus: Servicing Agreement	<input type="checkbox"/> continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
27	Assurance is given, that the assessment of the borrower's creditworthiness meets the requirements set out in Article 8 of Directive 2008/48/EC (Directive on credit agreements for consumers).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (10.)	eligibility criteria (z)	<input type="checkbox"/> continued on page 29
28	Assurance is given that the underlying exposure was granted and is administrated according to the normal business procedures of the originator which involves sound and well defined granting and underwriting criteria as well as effective dunning and internal auditing procedures.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 9 Article 20 (10.) TSI criterion	collection policy	<input type="checkbox"/> continued on page 29
29	Assurance is given that in intensive management and in the workout, both securitised and unsecuritised loans are subject to the same established rules, management mechanisms and internal auditing procedures.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion	collection policy	<input type="checkbox"/> continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
30	Assurance is given that all material changes from prior underwriting standards are fully disclosed (Article 20.10.) over a period of 5 years before issuance of securitisation (or over a period of maturity of the exposure with the longest maturity plus one year if this is the shorter timespan). Material is every change which affected the similarity of the underwriting standards, methods and criteria. Furthermore assurance is given after the issuance of the securitisation in the context of substitution, repurchase, replenishment, ramp up periods all modifications of the underwriting standards originally disclosed in the prospectus will be disclosed (for example in the investor report).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (10.)	No reference in the prospectus	<p>To our best knowledge we had no material changes in the underwriting standards , methods and criteria for the last 5 years.</p> <p>This will be verified again in the context with the notification for STS compliance.</p> <p style="text-align: right;"><input type="checkbox"/> continued on page 29</p>
31	In the transaction documentation are set out in clear and consistent terms definitions, remedies and actions relating to delinquency and default of debtors, debt restructuring, debt forgiveness, forbearance, payment holidays, losses, charge offs, recoveries and other asset performance remedies.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 21 (9.)	Prospectus Collection Policy	<p style="text-align: right;"><input type="checkbox"/> continued on page 29</p>

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments																
32	<p>Assurance is given, that the securitisation is backed by a pool of auto receivables (loans and leases for financing of different types of vehicles) that are homogenous in terms of asset type.</p> <p>This is given if</p> <p>a) the underwriting standards of the underlying exposures apply similar approaches to the assessment of credit risk,</p> <p>b) the servicing standards (monitoring, collection, administration) are executed by means of similar procedures, systems and governance and</p> <p>c) the pool consists of only one type of obligor and/or all obligors are residents of only one jurisdiction.</p> <p>If under c) only one of the two factors applies please explain under comments the rationale for selecting the specific factor and excluding the other.</p>	<table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> <td>n. a.</td> </tr> <tr> <td></td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		Yes	No	n. a.		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 20 (8.)	COLLECTION POLICY Eligible Criteria, Definition Auto Loan Contract	<p>All receivables in the pool run through the same underwriting processes where external credit bureau, rating, and own experience are used for the proof of borrowing capacity and creditworthiness.</p> <p>The transition between private and commercial customers is fluently, there is no concentration of commercial customers included.</p> <p>We consider the major issue as the character of the product which is loan within Germany.</p>
	Yes	No	n. a.																		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																		
33	<p>In case of securitisations where the underlying exposures are residential loans or auto loans or leases, the originator will publish the available information related to the environmental performance of the assets financed by such car loans or leases, as part of the information disclosed pursuant to article 7(1)(a) of the Securitisation Regulation. According to the EBA guidelines, this requirement should only be applicable in case the information on the energy performance certificates for the assets financed by the underlying exposures is available to the originator, sponsor or the SSPE and captured in its internal database or IT systems. When the information is not available, the requirement does not apply.</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td>Yes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>No</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>n. a.</td> </tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	n. a.	Article 22 (4.) EBA Guidelines, note 89		Information is not completely available										
<input type="checkbox"/>	Yes																				
<input type="checkbox"/>	No																				
<input checked="" type="checkbox"/>	n. a.																				

continued on page 29

continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
34 a	Assurance is given that the repayment of the securitisation does not depend predominantly on the sale of assets in the portfolio or its sales value. The transactions contents no more as 30 % residual values, which are not subject to material concentrations across the lifetime and the granularity of the residual values is with more than 500 exposures sufficiently high.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (13.) TSI criterion	No reference, by definition there is no residual value in the transaction.	<input type="checkbox"/> continued on page 29
34 b	If the conditions mentioned above in criteria 34 a. are not met assurance is given that the residual values in the transaction are guaranteed by a third party or are fully mitigated by a repurchase obligation. Whereby the third party is an eligible provider of credit protection according to Article 201 (1) of Regulation EU 575/2013 and Article 249 of Regulation EU 2017/2401.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> n. a.	Article 20 (13.)		<input type="checkbox"/> continued on page 29

Quality criteria in regard to the transaction structure

35	Assurance is given that the assets have been transferred to the special purpose vehicle in a legally valid, binding and legally enforceable manner. The title to the underlying exposures is acquired by the SSPE by means of a true sale or assignment or transfer with the same legal effect in a manner that is enforceable against the seller or any other third party. The transfer of the title to the SSPE is not subject to severe clawback provisions in the event of the seller's insolvency.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (1.) Article 20	Transaction Legal Opinion	<input type="checkbox"/> continued on page 29
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General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments												
36	Assurance is given that the asset pool includes only such receivables that are legally valid, binding and legally enforceable. The process of selling and transferring the underlying assets from the Originator to the SSPE is presented and well explained in the prospectus or the final offering document. Possible risks in the relevant jurisdictional law associated with the sale and transfer of the asset pool are described in the Prospectus or the final offering document.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (1.) Article 20 (6.) Article 20 (8.)	Eligibility Criteria (j; ii) LRPA present in the prospectus RISK FACTORS paragraphs	<input type="checkbox"/> continued on page 29												
37	<p>If the transfer of the underlying exposures is performed by means of an assignment and perfected at a later stage than at the closing of the transaction, the triggers to effect such perfection will, at least include the following events:</p> <ul style="list-style-type: none"> - severe deterioration in the seller credit quality standing; - insolvency of the seller an - dunremedied breaches of contractual obligations by the seller, including the seller's default. 	<table border="0"> <tr> <td>Yes</td> <td>No</td> <td>n. a.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> </table>	Yes	No	n. a.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Article 20 (5.)		<input type="checkbox"/> continued on page 29
Yes	No	n. a.															
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>															
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>															
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>															
38	The seller shall provide representations and warranties that, to the best of its knowledge, the underlying exposures included in the securitisation are not encumbered or otherwise in a condition that can be foreseen to adversely affect the enforceability of the true sale or assignment or transfer with the same legal effect. Encumbrance risks that may arise as a result of the legal framework are mitigated by means of appropriate provisions (e.g. set-off risk reserve or repurchase of the loans concerned) in the transaction structure.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (1.) Article 20 (2.) Article 20 (8.)	22 REPRESENTATIO NS, WARRANTIES AND UNDERTAKINGS OF THE ISSUER	<input type="checkbox"/> continued on page 29												

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
39	The transaction documentation clearly specifies the priorities of payment, events which trigger changes in such priorities of payment as well as the obligation to report such events. Any change in the priority of payment has to be reported to investors without undue delay unless the change will not materially adversely affect the repayment of the securitisation position.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 7 (1.)(b) Article 21 (9.)	9 PRIORITIES OF PAYMENTS Prospectus: Overview	<input type="checkbox"/> continued on page 29
40	The transaction documentation includes clear provisions that facilitate the timely resolution of conflicts between different classes of investors, voting rights are clearly defined and allocated to holders of securitisation position and the responsibilities of the trustee and other entities with fiduciary duties to investors are clearly identified.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 21 (10.)	18 RESOLUTIONS OF NOTEHOLDERS par 18.6	<input type="checkbox"/> continued on page 29
41	Assurance is given that the transaction is evaluated by at least two rating agencies which are established in the European Union, registered under the CRA Regulation (No 1060/2009) and supervised by the European Securities and Markets Association.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion	8 RISKS RELATING TO THE REGULATORY TREATMENT OF THE NOTES CRA3, par 8.5.2	S&P And Moody's <input type="checkbox"/> continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
42	At the transaction cut-off date, the portfolio of loans to be securitised is qualitatively representative of the originator's corresponding portfolio in accordance with the established selection criteria. Assurance is given that, with regard to the marketing channels, the types of product and product features (e.g. purpose of the loan, maturity or condition structure) and the borrower unit, there are no systematic qualitative divergences from the originator's corresponding product range.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion Article 9 (1.) Article 20 (10) Article 20 (11.)	Collection Policy	<input type="checkbox"/> continued on page 29
43	The interest rate and currency risks arising from the securitisation are appropriately mitigated and any measures taken to that effect are disclosed. Except for the purpose of hedging currency risk or interest rate risk, the SSPE does not enter into derivative contracts and the pool of underlying exposures does not include derivatives. The hedging derivatives are underwritten and documented according to common standards in international finance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 21 (2.)	9 THE SWAP AGREEMENTS	<input type="checkbox"/> continued on page 29
44	Any referenced interest payments under the securitisation assets and liabilities are based on generally used market interest rates, or generally used sectoral rates reflective of the cost of funds, and do not reference complex formulae or derivatives.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 21 (3.)	4 The Notes, par Interest Rate	<input type="checkbox"/> continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
45	The underlying exposures transferred from, or assigned by the seller to the SSPE shall meet predetermined, clear and documented eligibility criteria which do not allow for active portfolio management of those exposures on a discretionary basis.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (7.)	eligibility criteria	<p style="text-align: right;"><input type="checkbox"/> continued on page 29</p>
46	Assurance is given that the underlying exposures shall be transferred to the SSPE after the selection without undue delay.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 20 (11.)	LRPA	<p>The transaction has a contractual limited timeframe between the offer date and the sale date: offer date: Means, during the Revolving Period, the 6th Business Day following a Reference Date. sale date = payment date: means 21 January 2019 and thereafter each 21st calendar day of each month</p> <p style="text-align: right;"><input type="checkbox"/> continued on page 29</p>

General quality criteria

No	Quality criterion	Criterion fulfilled			Reference to the Regulation	Prospectus / reference	Comments
		Yes	No	n. a.			
47	The transaction						
	- does not include a revolving period; or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
	- in case that a revolving period is included: The transaction documentation shall include appropriate early amortization provisions or triggers for termination of the revolving period, including at least the following:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 21 (6.)	Early redemption for default; Early Amortisation Event	Delinquency ratio and replenishment ratio definitions can be found in the transaction definition schedules
	• a deterioration in the credit quality of the underlying exposures to or below a predetermined threshold;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	• the occurrence of an insolvency-related event with regard to the originator or the servicer;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	• the value of the underlying exposures held by the SSPE falls below a predetermined threshold (early amortization event);	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	• a failure to generate sufficient new underlying exposures that meet the predetermined credit quality (trigger for termination of the revolving period).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
48	The transaction has a						
	- sequential priority of payments; or a	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
	- non-sequential priority of payments and includes triggers relating to the performance of the underlying exposures resulting in the priority of payments reverting to sequential payments in order of seniority if the credit quality of the underlying exposures below a pre-determined threshold.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Article 21 (5.)		
	- The transaction is a revolving securitisation transaction and includes further provisions and triggers according to article 21.6. of the Securitisation Regulation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Article 21 (6.)		

continued on page 29

continued on page 29

General quality criteria

No Quality criterion

49 Assurance is given, that the transaction is structured in a way that in an early amortisation event and after an enforcement or an acceleration notice has been delivered no amount will be trapped in the SSPE beyond what is necessary to ensure the operational functioning of the SSPE or the orderly repayment of investors in accordance with the contractual terms of the securitisation (unless exceptional circumstances require that amount is trapped in order to be used, in the best interests of investors, for expenses that will avoid the deterioration in the credit quality of the underlying exposures). All principal receipts from the underlying exposures will be passed to investors via sequential amortisation of the securitisation positions, as determined by the seniority of the securitisation position; repayment of the securitisation positions will not be reversed with regard to their seniority and no provisions will require automatic liquidation of the underlying exposures at market value.

Yes
 No
 n. a.

Reference to the Regulation

Article 21 (4.)

Prospectus / reference

Priority of Payments (acceleration; amortisation)

Comments

continued on page 29

50 Assurance is given that all key transaction parties (e.g. servicer, account bank, swap provider, etc.) and their tasks, contractual obligations and responsibilities are described in the Prospectus or the final document. If specific requirements are made with regard to the rating of the relevant transaction party, these must be presented in the Prospectus or the final document and the measures to be taken if the rating falls below the defined target value must be indicated.

Yes
 No
 n. a.

TSI criterion and Article 21 (7.)

overview of further transaction documents

continued on page 29

General quality criteria

No	Quality criterion	Criterion fulfilled	Reference to the Regulation	Prospectus / reference	Comments
51	Assurance is given that the contractual obligations, duties and responsibilities of the servicer, trustee and all other ancillary service providers are clearly specified in the transaction documentation. In the case of an insolvency or default of the servicer or any other counterparty the documentation specifies the rights and procedures regarding the replacement of the servicer.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	Article 21 (7.)	overview of further transaction documents; The Trust Agreement	<input type="checkbox"/> continued on page 29
52	Confirmation is given that at least one lead manager or arranger is involved in the transaction and that the lead manager or arranger is also named accordingly in the listing prospectus or the final document.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion	THE PARTIES	<input type="checkbox"/> continued on page 29
53	Assurance is given that no significant changes will be made to the transaction structure in the period from the announcement to the closing of the transaction. The originator confirms that changes to the transaction structure will be reported to the TSI without undue delay.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n. a.	TSI criterion		<input type="checkbox"/> continued on page 29

Additional quality criteria for auto loans

No Quality criterion

Criterion fulfilled

Reference to the Regulation

Prospectus / reference

Comments

Definition of auto loans

54 The definition of auto loans is based on a loan to a borrower for the purchase of a motor vehicle, in which the item financed is used as collateral (assignment as security – to the extent legally feasible in the relevant jurisdiction) and the vehicle registration document essentially remains with the lender or his / her authorised representative.

- Yes
 No
 n. a.

Definition Loan receivable

continued on page 29

Comments

Provision of anonymised loan-level data

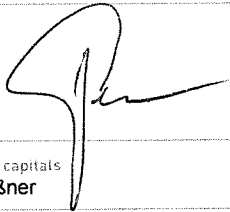
After considering data protection issues and bank secrecy, the certification applicant shall provide anonymised loan-level data over the entire term of the transaction.

Yes. The data will be provided in the form described below:

Yes, loan-level data will be provided each month.

Place, Date
Heilbronn, 28.11.2018

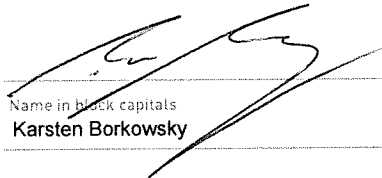
Signature



Name in block capitals
Bernd Gleißner

Place, Date
Heilbronn, 28.11.2018

Signature ¹



Name in block capitals
Karsten Borkowsky

¹ Customary evidence must be provided of the signatory's representative entitlement, where appropriate by means of an attestation issued by the Originator's legal department.