

CREDIT OPINION

7 April 2025

New Issue



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7 April 2025

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Analyst Contacts

Martin Lenhard +49.69.70730.743
VP-Sr Credit Officer
martin.lenhard@moody's.com

Bausparkasse Mainz AG – Mortgage Covered Bonds

New Issue – German covered bonds

Ratings

Exhibit 1

Cover Pool (€)	Ordinary Cover Pool Assets	Covered Bonds (€)	Rating
263,073,652	Residential Mortgage Loans	203,700,000	Aaa

All data in the report is as of December 31, 2024 unless otherwise stated

Source: Moody's Ratings

Summary

The covered bonds issued by Bausparkasse Mainz AG (the issuer, A2(cr)) under its mortgage sector Bausparkasse Mainz AG – Mortgage Covered Bonds programme are full recourse to the issuer and are secured by a cover pool of assets that consists of German residential mortgage loans.

Credit strengths include the full recourse of the covered bonds to the issuer and support provided by the German legal framework for *Pfandbriefe*, which provides for the issuer's regulation and supervision.

Credit challenges include the high level of dependency on the issuer. As with most covered bonds in Europe, there are few restrictions on the future composition of the cover pool. The cover pool also has geographical concentration risks.

Our credit analysis takes into account the cover pool's credit quality, which is reflected in the collateral score of 4.8%, and the current over-collateralisation (OC) of 33.1% (on a net present value basis) as of 31 December 2024.

Credit strengths

- » **Recourse to the issuer:** The covered bonds are full recourse to Bausparkasse Mainz AG (A2(cr)). (See "Covered bond analysis")
- » **Support provided by the German legal framework:** The covered bonds are governed by the German *Pfandbrief* Act, which provides for the issuer's regulation and supervision and sets certain minimum requirements for the covered bonds and the cover pool. (See "[Germany's legal framework for covered bonds](#)")

- » **High credit quality of the cover pool:** The covered bonds are supported by a cover pool of high-quality assets. All ordinary assets are residential mortgage loans backed by properties in Germany. The collateral quality is reflected in the collateral score, which is currently 4.8%. (See "Cover pool analysis")
- » **Refinancing risk:** Following what we call a covered bond (CB) anchor event, refinancing risk would be mitigated by a well-established and deep market for German *Pfandbriefe*, as well as the liquidity-matching requirements. A CB anchor event occurs when the issuer, or another entity within the issuer group that supports the issuer, ceases to service the payments on the covered bonds. (See "Covered bond analysis")
- » **Interest rate and currency risks:** Interest rate risk is mitigated by the 2% OC requirement, which has to be maintained in stressed market conditions (that is, yield curve movements and changes in the relevant exchange rates). Currencies are well matched in this programme. All of the assets and liabilities are denominated in euros. (See "Covered bond analysis")
- » **Provisions for a cover pool administrator:** Following an issuer default, the covered bondholders would benefit from a cover pool administrator (the *Sachwalter*) that acts independently from the issuer's insolvency administrator. Furthermore, if the German banking regulator BaFin deems it necessary, the *Sachwalter* may be appointed ahead of any issuer default. (See "Covered bond analysis")

Credit challenges

- » **High level of dependency on the issuer:** As with most covered bonds, before the insolvency of the issuer, the issuer can materially change the nature of the programme. For example, the issuer can add new assets to the cover pool, issue new covered bonds with varying promises and enter into new hedging arrangements. Also similar to most covered bonds in Europe, this programme has few restrictions on the future composition of the cover pool. These changes could affect the credit quality of the cover pool as well as the overall refinancing and market risks. Further, if the quality of the collateral deteriorates below a certain threshold, the issuer would have the ability, but not the obligation, to increase the OC in the cover pool. (See "Covered bond analysis")
- » **Cover pool concentration:** The cover pool has geographical concentration, with all loans backed by properties in Germany and particular concentration in Nordrhein-Westfalen (20.9%) and Hessen (19.8%) region of Germany. (See "Cover pool analysis")
- » **Market risks:** Following a CB anchor event, covered bondholders, to achieve timely principal payment, might need to rely on proceeds raised through the sale of, or borrowing against, the cover pool assets. The market value of these assets may be subject to high volatility after a CB anchor event. (See "Covered bond analysis")
- » **Time subordination:** After a CB anchor event, later-maturing covered bonds are subject to time subordination. Principal cash collections may be used on a first-come, first-served basis, paying earlier-maturing covered bonds before later-maturing covered bonds. This subordination could lead to the erosion of OC before any payments are made to later-paying covered bonds. (See "Covered bond analysis")
- » **Lack of liquidity facility:** The programme would not benefit from any designated source of liquidity if cash flow collections are interrupted. (See "Covered bond analysis")

Key characteristics

Exhibit 2

Covered bond characteristics

Moody's Programme Number:	536
Issuer:	Bausparkasse Mainz AG
Covered Bond Type:	Residential mortgage loans
Issued under Covered Bonds Law:	Yes
Applicable Covered Bonds Law:	German <i>Pfandbrief</i> Act
Entity used in Moody's TPI analysis:	Bausparkasse Mainz AG
CR Assessment:	A2(cr)
CB Anchor:	A1
Senior unsecured/deposit rating:	A2
Total Covered Bonds Outstanding:	€203,700,000
Main Currency of Covered Bonds:	EUR (100%)
Extended Refinance Period:	Yes
Principal Payment Type:	Soft bullet (12 months extension)
Interest Rate Type:	Fixed rate covered bonds (100%)
Committed Over-Collateralisation:	2% stressed NPV plus 2% nominal
Current Over-Collateralisation:	33.1% (net present value)
Intra-group Swap Provider:	n/a
Monitoring of Cover Pool:	n/a
Trustees:	n/a
Timely Payment Indicator:	High
TPI Leeway:	3 notches

Source: Moody's Ratings, issuer data

Exhibit 3

Cover pool characteristics

Size of Cover Pool:	€263,073,652
Main Collateral Type in Cover Pool:	Residential assets (100.0%)
Main Asset Location of Ordinary Cover Assets:	Germany(100.0%)
Main Currency:	EUR (100.0%)
Loans Count:	2,265
Number of Borrowers:	3,818
WA Unindexed LTV:	82.5%
WA Indexed LTV:	n/d
WA Seasoning (in months):	41
WA Remaining Term (in months):	69
Interest Rate Type:	Fixed rate assets(100.0%)
Collateral Score:	4.8%
Cover Pool Losses:	14.8%
Further Cover Pool Details:	See Appendix 1
Pool Cut-off Date:	31 December 2024

Sources: Moody's Ratings, issuer data

Exhibit 4

Transaction counterparties

Counterparty Type	Transaction Counterparty
Sponsor	n/a
Servicer	n/a
Back-up Servicer	n/a
Back-up Servicer Facilitator	n/a
Cash Manager	n/a
Back-up Cash Manager	n/a
Account Bank	n/a
Standby Account Bank	n/a
Account Bank Guarantor	n/a

Sources: Moody's Ratings, issuer data

Covered bond description

The covered bonds issued under the mortgage covered bond programme of Bausparkasse Mainz AG are full recourse to the issuer. Upon a CB anchor event, covered bondholders would have access to a cover pool of residential mortgage loan receivables.

Structure description**The bonds**

All outstanding covered bonds have a soft bullet repayment at maturity, with an extension period of 12 months for the repayment of the bonds.

Issuer recourse

The covered bonds are full recourse to the issuer. Therefore, the issuer is obliged to repay principal and pay interest on the covered bonds.

Recourse to cover pool and over-collateralisation

If the issuer becomes insolvent, the covered bondholders would have priority claims over a pool of assets (cover pool). (See "Cover pool description" for the cover pool characteristics and "Cover pool analysis" for our analysis of the pool)

As of 31 December 2024, the level of OC in the programme was 33.1% on a net present value basis.

The current covered bond rating relies on an OC beyond the minimum legal requirements by the German *Pfandbrief* Act. The act requires that the cover pool value exceeds the principal balance of the bonds by 2%. Based on data as of 31 December 2024, 8.0% of OC is sufficient to maintain the current covered bond rating, which is higher than the committed OC. This shows that our analysis currently relies on OC that is not in committed form.

Although the issuer has the ability to increase the OC in the cover pool if collateral quality deteriorates below a certain threshold, the issuer does not have any obligation to do so. The failure to increase OC following a deterioration of the collateral could lead to a negative rating action.

Legal framework

The covered bonds are governed by the *Pfandbrief* Act. There are a number of strengths in this legislation, including the regulation of the issuer by BaFin, as well as certain minimum requirements for the covered bonds and the cover pool. No specific structural features beyond the statutory requirements are implemented for Bausparkasse Mainz AG's mortgage covered bond programme. (See "[Covered Bonds: Germany's legal framework for covered bonds](#)", June 2022, for a description of the general legal framework for *Hypothekendarpfandbriefe* governed by the *Pfandbrief* Act.)

Covered bond analysis

Our credit analysis of the covered bonds primarily focuses on the issuer's credit quality, refinancing risk, interest rate risk and currency risk, as well as the probability that payments on the covered bonds would be made in a timely fashion following a CB anchor event, which we measure using the Timely Payment Indicator. (See "Timely Payment Indicator")

Primary analysis

Issuer analysis - Credit quality of the issuer

The issuer's CR Assessment is A2(cr). (For a description of the issuer's rating drivers, see [Credit Opinion](#), published January 2025)

The reference point for the issuer's credit strength in our analysis is the CB anchor, which for covered bond programmes under the covered bond law in Germany is the CR Assessment plus one notch.

Issuer analysis - Dependency on the issuer's credit quality

The credit quality of the covered bonds depends primarily on the credit quality of the issuer. If the issuer's credit strength were to deteriorate, there would be a greater risk that a CB anchor event would occur, leading to refinancing risk for the covered bonds. Consequently, the credit quality of the covered bonds would deteriorate unless other credit risks were to decrease.

In the event that the CB anchor deteriorates, the issuer would have the ability, but not the obligation, to increase the OC in the cover pool. Failure to increase the level of OC under these circumstances could lead to a negative rating action.

Reasons for the high level of dependency of the covered bonds with the issuer also include exposure to decisions made by the issuer in its discretion as manager of the covered bond programme. For example, before a CB anchor event, the issuer may add new assets to the cover pool and remove assets from the cover pool, issue further bonds and enter new hedging arrangements. Such actions could reduce the value of the cover pool.

As with most covered bonds in Europe, there are few contractual restrictions on the future composition of the cover pool, which creates substitution risk. Nevertheless, cover pool quality over time will be protected by, among other things, the requirements of the German *Pfandbrief* Act, which specifies what types of assets are eligible. (See "[Germany's legal framework for covered bonds](#)")

Refinancing risk

Following a CB anchor event, the "natural" amortisation of the cover pool assets alone cannot be relied on to repay the principal. We assume that funds must be raised against the cover pool at a discount if covered bondholders are to receive timely principal payment. Where the portion of the cover pool that is potentially exposed to refinancing risk is not contractually limited, our expected loss analysis typically assumes that this amount is in excess of 50% of the cover pool.

After a CB anchor event, the market value of these assets may be subject to volatility. Examples of the stressed refinancing margins we use for different types of prime-quality assets are published in our Rating Methodology. (See "[Rating Methodology - Covered Bonds](#)")

The refinancing-positive factors outweigh the negative ones. The refinancing-positive aspects of this covered bond programme include:

- » The *Pfandbrief* Act: At the time of the declaration of the issuer's bankruptcy, or earlier if BaFin considers it necessary, a cover pool administrator (the *Sachwalter*) would take over management responsibility of the covered bond programme. The *Sachwalter* would have the ability to use the 12-month statutory extension period of German *Pfandbrief* programmes and/or to sell all or part of the cover pool, with or without all or parts of the liabilities attached.
- » The depth of the German market and the high level of government and financial market support expected to be available to *Pfandbriefe* in Germany, where refinancing risk is perceived as lower than in most other jurisdictions. In the modeling of this transaction, we have used refinancing margins that are lower than the refinancing margins used for most other jurisdictions.

Interest rate and currency risk

As with the majority of European covered bonds, there is potential for interest rate and currency risks, which could arise from the different payment promises and durations made on the cover pool and the covered bonds.

Exhibit 5

Overview of assets and liabilities

	WAL Assets (Years)	WAL Liabilities (Years)	Assets (%)	Liabilities (%)
Fixed rate	5.7	6.2	96.7%	100.0%
Variable rate	0.5	n/a	3.3%	0.0%

WAL = weighted average life

n/a = not applicable

NB: Fixed rate loans which reset within the next 12 months are treated as variable rate in this table

Sources: Moody's Ratings, issuer data

In the event of issuer insolvency, we currently do not assume that the *Sachwalter* would always be able to efficiently manage any natural hedge between the cover pool and the covered bonds. Therefore, following a CB anchor event, our model separately assesses the impact of increasing and decreasing interest rates on the expected loss of the covered bonds, taking the path of interest rates that leads to the worst result. The interest rate and currency stresses used over different time horizons are published in our Rating Methodology.

Aspects of this covered bond programme that are market-risk positive include:

- » No currency risk. Currently, there are no foreign currency-denominated covered bonds or cover assets in this programme.
- » The requirement under the *Pfandbrief* Act that the stressed net present value OC of the cover pool must exceed, by at least 2%, the total of outstanding covered bonds issued against the cover pool, and the requirement that *Pfandbrief* issuers must regularly run stress tests regarding interest rate and foreign-exchange risks. Bausparkasse Mainz opted for the "static" stress test to meet statutory stress tests requirements.

Aspects of this covered bond programme that are market-risk negative include:

- » A potential sale of fixed-rate assets to meet payments due on covered bonds following a CB anchor event could lead to a crystallisation of mark-to-market losses caused by interest rate movements upon issuer default.
- » All of the cover pool assets are fixed rate.

Timely Payment Indicator

Our Timely Payment Indicator (TPI) assesses the likelihood that timely payments would be made to covered bondholders following a CB anchor event, and thus determines the maximum rating a covered bond programme can achieve with its current structure while allowing for the addition of a reasonable level of OC. We have assigned a TPI of High to these covered bonds, in line with other mortgage covered bonds issued under the *Pfandbrief* Act.

Based on the current TPI of High, the TPI leeway for this programme is three notches. This three-notch leeway implies that we might downgrade the covered bonds' rating because of a TPI cap if we were to lower the CB anchor by more than four notches, all other variables being equal.

The TPI-positive aspects of this covered bond programme include:

- » The high level of government and financial market support provided to *Pfandbriefe* in Germany.
- » The refinancing-positive factors discussed in the "Refinancing risk" section
- » The strength of the German *Pfandbrief* legislation, including:
 - The *Sachwalter* would take over management responsibility of the covered bond programme at the time of the declaration of the issuer's bankruptcy, or earlier if BaFin were to consider it necessary.
 - The *Sachwalter* would act independently from the issuer's insolvency administrator. Having an independent cover pool administrator might reduce potential conflicts of interest between the covered bondholders and other creditors.

- The issuer is required to cover potential liquidity gaps over the next 180 days between payments expected to be received under the cover pool assets and payments due under the outstanding covered bonds.
 - Set-off: We understand that the *Pfandbrief* Act excludes from set-off loans registered in the cover pool that are under German law and located in Germany.
- » The credit quality of the cover pool assets, reflected by the collateral score of 4.8%.

The TPI-negative aspects of this covered bond programme include:

- » The covered bond programme does not benefit from any designated source of liquidity if cash flow collections are interrupted.
- » Commingling risk: Upon the appointment of the *Sachwalter*, it is our understanding that the *Sachwalter* has a priority claim on all cash flows stemming from the cover pool assets. However, these cash flows have to be separated from other cash flows to the issuer before they can be used to make payments to covered bondholders.

Additional analysis

Liquidity

The covered bond programme would not benefit from any designated source of liquidity if cash flow collections were to be interrupted. However, before an issuer default, the *Pfandbrief* Act requires the issuer to cover potential liquidity gaps for the next 180 days based on the outstanding covered bonds' expected maturity dates (not the extended maturity dates) and to maintain a minimum OC level of 2%. After an issuer default, the *Sachwalter* would have the ability to sell a portion of the cover pool to make timely payments on the bonds.

Time subordination

After a CB anchor event, later-maturing covered bonds would be subject to time subordination. Principal cash collections may be used on a first-come, first-served basis, paying earlier-maturing covered bonds before later-maturing covered bonds. Such payments could result in the erosion of OC before any payments are made to later-paying covered bonds.

Cover pool description

Pool description as of 31 December 2024

As of 31 December 2024, the cover pool consisted of residential mortgage loans and substitute collateral. All mortgage loans are backed by properties in Germany. The cover pool also has significant geographical concentration in Nordrhein-Westfalen (20.9%) and Hessen (19.8%). 0.8% of the loans are in early arrears, 0.5% of which less than for 2 months.

The cover pool assets total €263.1 million, which back €203.7 million of covered bonds, resulting in a nominal OC of 29.1% (or 33.1% on a net present value basis).

Residential mortgage loans

The residential mortgage loans amount to €253.1 million. The weighted average unindexed loan-to-value (LTV) ratio of the residential loans is 82.5%.

77% of the loans in the cover pool are interest only loans, so-called pre-financing loans, which are linked to a home loan savings account. Instead of amortising the loan, the borrower pays regular instalments into the loan savings account. Once a defined minimum savings amount is reached and other conditions are met, the borrower is eligible for a home loan. The deposit amount together with the home loan amount is used to repay the initial interest-only loan. Thereafter, the home loan is repaid as an annuity loan.

Only pre-financing loans and no home loans are currently included in the cover pool.

For the issuer's underwriting criteria, see "Appendix: Income underwriting and valuation".

The exhibits below show more details about the cover pool characteristics.

Exhibit 6

Cover pool summary

Overview		Specific Loan and Borrower characteristics	
Asset type:	Residential	Loans with an external guarantee in addition to a mortgage:	0.0%
Asset balance:	253,073,652	Interest only Loans	77.1%
Average loan balance:	111,732	Loans for second homes / Vacation:	0.0%
Number of loans:	2,265	Buy to let loans / Non owner occupied properties:	9.6%
Number of borrowers:	3,818	Limited income verified:	n/d
Number of properties:	2,163	Adverse credit characteristics (**)	n/d
WA remaining term (in months):	69		
WA seasoning (in months):	41	Performance	
		Loans in arrears (≥ 2months - < 6months):	0.3%
		Loans in arrears (≥ 6months - < 12months):	0.0%
Details on LTV		Loans in arrears (≥ 12months):	0.0%
WA unindexed LTV (*)	82.5%	Loans in a foreclosure procedure:	0.0%
WA Indexed LTV:	n/d		
Valuation type:	Lending Value		
LTV threshold:	60%	Multi-Family Properties	
Junior ranks:	n/d	Loans to tenants of tenant-owned Housing Cooperatives:	n/a
Loans with Prior Ranks:	n/d	Other type of Multi-Family loans (***)	n/a

n/a: not available.

(*) May be based on property value at the time of origination or further advance or borrower refinancing.

(**) Typically borrowers with a previous personal bankruptcy or borrowers with a record of court claims against them at the time of origination.

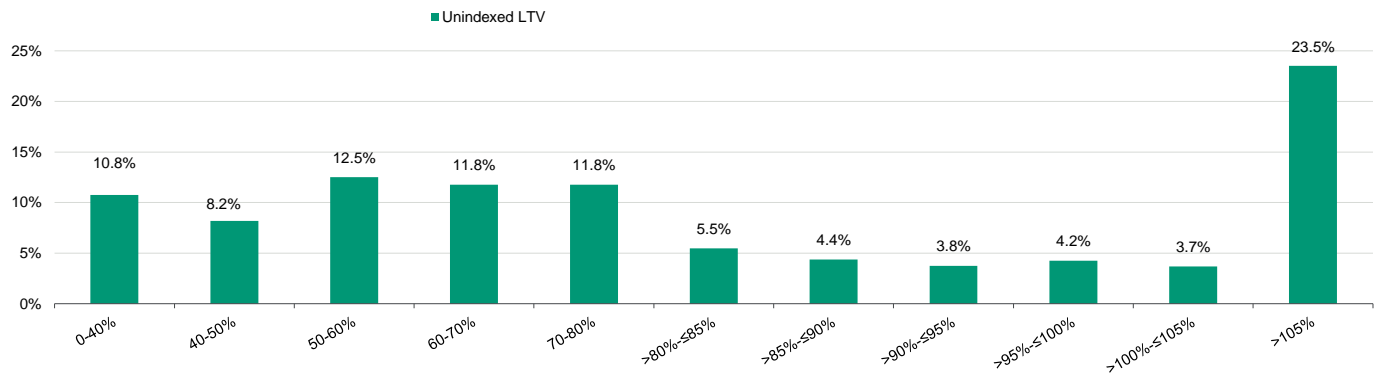
(***) This "other" type refers to loans directly to Housing Cooperatives and to Landlords of Multi-Family properties (not included in Buy to Let).

Sources: Moody's Ratings and issuer data

Cover pool characteristics

Exhibit 7

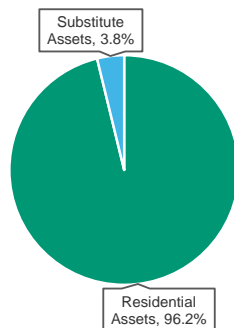
Balance per LTV band



Sources: Moody's Ratings and issuer data

Exhibit 8

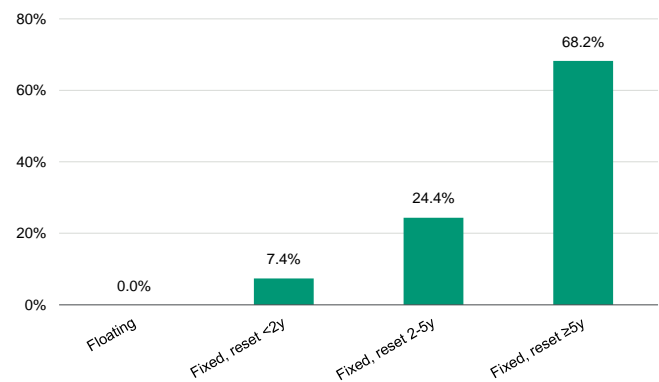
Percentage of residential assets



Sources: Moody's Ratings and issuer data

Exhibit 9

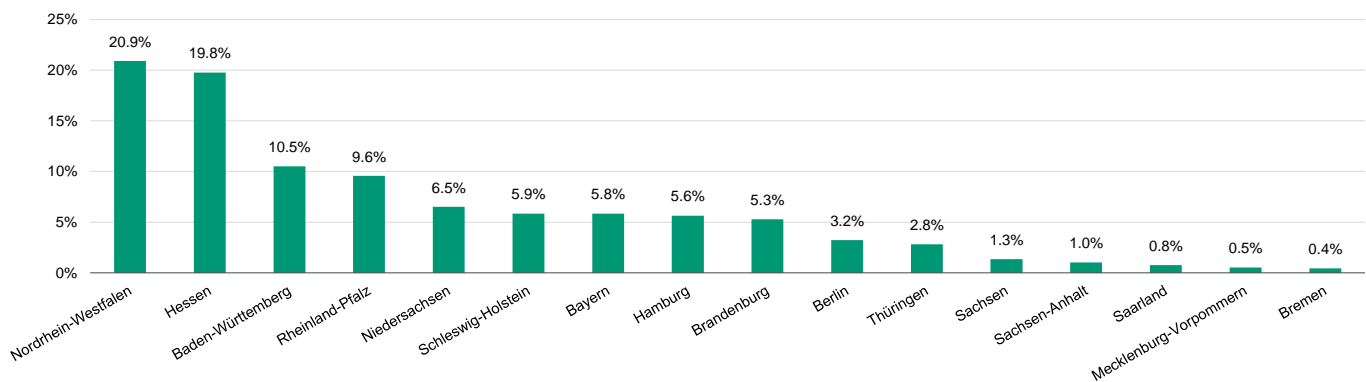
Interest rate type



Sources: Moody's Ratings and issuer data

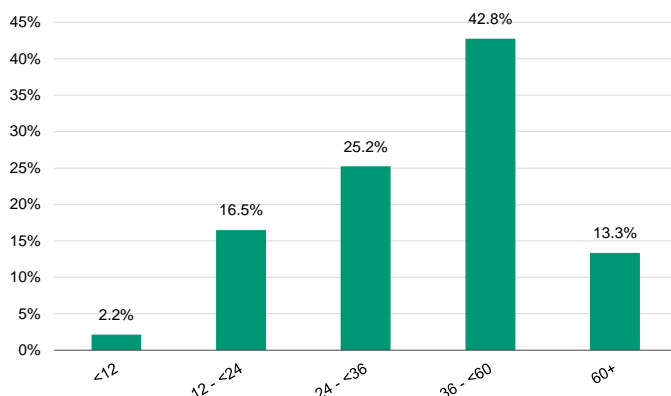
Exhibit 10

Main country regional distribution



Sources: Moody's Ratings and issuer data

Exhibit 11

Seasoning (in months)

Sources: Moody's Ratings and issuer data

Substitute collateral

The cover pool contains €10 million of substitute assets. These are government bonds of EU countries rated between A1 and A3.

Cover pool monitor

Pursuant to the *Pfandbrief* Act, the regulator (BaFin) has appointed a cover pool monitor (*Treuhänder*). (See "[Germany's legal framework for covered bonds](#)")

Cover pool analysis

Our credit analysis of the pool takes into account specific characteristics of the pool, as well as legal risks.

Primary cover pool analysis

We calculate the collateral score for the cover pool using a scoring model to assess the credit risk for the residential assets in the cover pool. Our analysis takes into account, among other factors, the LTV ratios of the mortgage loans, the seasoning and the geographical distribution.

For this programme, the collateral score of the current pool is 4.8%, which is lower than the average collateral score of other German mortgage covered bonds. (For details, see "[Moody's Global Covered Bonds Sector Update, Q4 2024](#)").

From a credit perspective, we view positively the following characteristics of the cover assets:

- » The loans are well-seasoned (weighted average seasoning is 41 months).
- » The borrowers maintain significant amounts of deposits with Bausparkasse Mainz. Currently, the aggregate amount of deposits the borrowers maintain with the issuer is €55million, which represents about 22% of the total amount of the mortgage loans in the cover pool. These deposits provide additional collateral which is not reflected in the disclosed LTVs and we did not give benefit to these deposits in our analysis because we generally only consider mortgages in the denominator when we calculate LTVs.

From a credit perspective, we view negatively the following characteristics of the cover assets:

- » 0.8% of the loans are in early arrears while all other loans are current. We understand that Bausparkasse Mainz regularly removes loans from the cover pool once they reach a more severe arrears status.
- » The weighted average unindexed LTV of the cover assets is 82.5%, which is higher than the average of German cover pools but mitigated by the additional collateral in form of pledged deposits. Residential mortgage loans in German cover pools are predominantly annuity loans and well seasoned. The amortisation of this loan type leads to declining LTVs over time. This is not to the same extent the case for Bausparkasse Mainz' cover pool, because the majority of the loans do not amortize while the corresponding build-up of deposits is not reflected in the LTV calculation.

- » Due to the small pool size, borrower concentrations are higher than in other German cover pools. These borrower concentrations drive our risk assessment in adverse scenarios.
- » Regional concentration in Nordrhein-Westfalen (20.9%) and Hessen (19.8%). Such regional concentrations increase the risk of significant losses in a stressed future environment but are mitigated for this cover pool by the generally good credit quality of the individual borrowers and the 60% LTV eligibility criterion of the *Pfandbrief* Act that significantly reduces the expected loss severity of the individual loans in the cover pool.
- » The pre-financing loans offered by Bausparkassen have different features than standard German annuity loans. In addition to the interest-only feature and the linked savings contract, the pre-financing loans have a specific maturity date already set at loan origination. We understand that this maturity date is based on the expected date of the disbursement of the home loan which is in turn used to repay the pre-financing loan. In the regular course of business we do not consider this loan product more risky than a standard annuity loan but in the adverse scenario of an issuer default these borrowers might experience increased refinancing risk because they would need to find another lender to refinance the pre-financing loan. We have considered this feature and apply an interest-only loan penalty in our modeling of the cover pool.

Additional cover pool analysis

Legal risks for assets outside of Germany

In the event of the issuer's insolvency, we believe that cover pool assets outside of Germany would be less protected against claims of the issuer's other creditors than would be assets in Germany. In particular, we have identified and analysed the following scenarios:

- » Claims against borrowers outside of Germany or loans not governed by German law: In the case of loans not governed by German law, the borrower might be allowed to exercise set-off, thereby reducing the amount that would be payable to the benefit of covered bondholders. This risk does currently not exist for this programme because all the cover pool assets are German assets and secured by properties in Germany.
- » Loans to borrowers outside of the European Economic Area (EEA): All of the mortgage loans are granted to borrowers within the EEA. If this criteria were to change, in addition to the above risk, the cover pool assets might not be available to the covered bondholders on a priority basis because other (unsecured) creditors of the issuer might successfully access the assets in the cover pool. These actions might result in lower recovery, owing, for example, to secondary proceedings commenced under the respective domestic law.

Comparables

Exhibit 12

Comparables - Bausparkasse Mainz AG – Mortgage Covered Bonds and other selected German deals

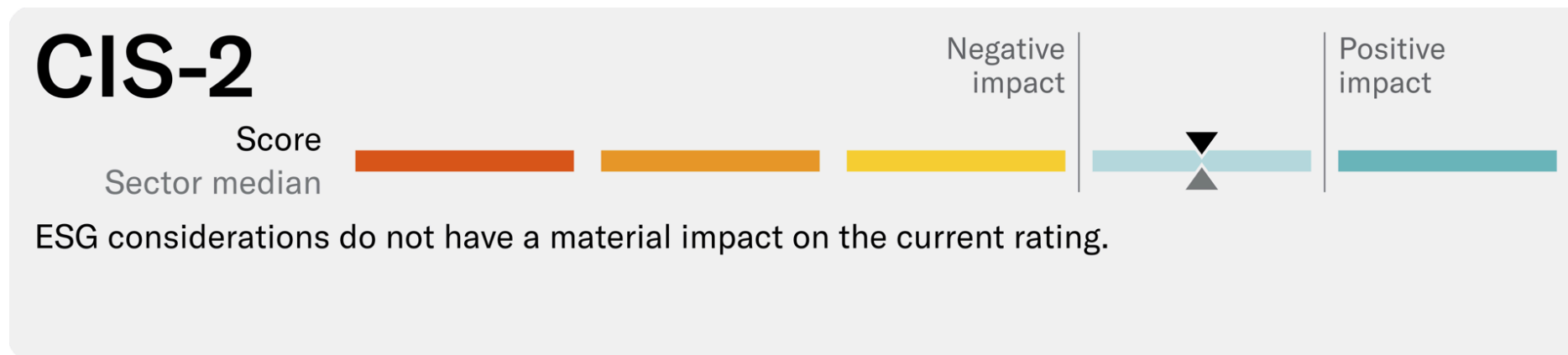
PROGRAMME NAME	Bausparkasse Mainz AG – Mortgage Covered Bonds	Bausparkasse Schwäbisch Hall AG - Mortgage Covered Bonds	Oldenburgische Landesbank - Mortgage Covered Bonds	Santander Consumer Bank AG - Mortgage Covered Bonds	ING-DiBa AG - Mortgage Covered Bonds	Commerzbank AG - Mortgage Covered Bonds
Overview						
Programme is under the law	Pfandbrief Act	Pfandbrief Act	Pfandbrief Act	Pfandbrief Act	Pfandbrief Act	Pfandbrief Act
Main country in which collateral is based	Germany	Germany	Germany	Germany	Germany	Germany
Country in which issuer is based	Germany	Germany	Germany	Germany	Germany	Germany
Total outstanding liabilities	203,700,000	4,125,000,000	2,058,200,000	1,025,000,000	12,305,000,000	29,187,248,409
Total assets in the Cover Pool	263,073,652	6,638,210,857	2,573,323,495	1,779,341,380	16,473,688,281	43,295,526,924
Issuer name	Bausparkasse Mainz AG	Bausparkasse Schwäbisch Hall AG	Oldenburgische Landesbank AG	Santander Consumer Bank	ING-DiBa AG	Commerzbank AG
Issuer CR assessment	A2(cr)	Aa2(cr)	A2(cr)	A1(cr)	Aa3(cr)	A1(cr)
Group or parent name	n/a	n/a	n/a	Santander Consumer Finance S.A.	n/a	n/a
Group or parent CR assessment	n/a	n/a	n/a	A3(cr)	n/a	n/a
Main collateral type	Residential	Residential	Residential	Residential	Residential	Residential
Collateral types	Residential 100%	Residential 98%, Other/Supplementary assets 2%	Residential 90%, Commercial 1%, Other/Supplementary assets 9%	Residential 71%, Other/Supplementary assets 29%	Residential 94%, Other/Supplementary assets 6%	Residential 94%, Commercial 2%, Other/Supplementary assets 4%
Ratings						
Covered bonds rating	Aaa	Aaa	Aaa	Aaa	Aaa	Aaa
Entity used in Moody's EL & TPI analysis	Bausparkasse Mainz AG	Bausparkasse Schwäbisch Hall AG	Oldenburgische Landesbank AG	Santander Consumer Bank AG	ING-DiBa AG	Commerzbank AG
CB anchor	A1	Aa1	A1	Aa3	Aa2	Aa3
CR Assessment	A2(cr)	Aa2(cr)	A2(cr)	A1(cr)	Aa3(cr)	A1(cr)
SUR / LT Deposit	A2	n/a	Baa1	A1	n/a	A2
Unsecured claim used for Moody's EL analysis	Yes	Yes	Yes	Yes	Yes	Yes
Value of Cover Pool						
Collateral Score	4.8%	4.0%	4.2%	4.0%	4.0%	4.4%
Collateral Score excl. systemic risk	n/a	1.4%	n/a	1.3%	3.6%	3.2%
Collateral Risk (Collateral Score post-haircut)	3.2%	2.7%	2.8%	2.7%	2.7%	3.0%
Market Risk	11.6%	10.8%	10.2%	8.1%	12.2%	10.2%
Over-Collateralisation Levels						
Committed OC*	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%
Current OC	33.1%	53.3%	20.9%	80.2%	30.0%	44.7%
OC consistent with current rating	8.0%	0.0%	7.0%	1.5%	0.0%	3.5%
Surplus OC	25.1%	53.3%	13.9%	78.7%	30.0%	41.2%
Timely Payment Indicator & TPI Leeway						
TPI	High	High	High	High	High	High
TPI Leeway	3	6	3	4	5	4
Reporting date	31 December 2024	30 September 2024	30 September 2024	01 October 2024	30 September 2024	30 September 2024

Source: Moody's Ratings, issuer data

ESG considerations

Bausparkasse Mainz AG – Mortgage Covered Bond's ESG credit impact score is CIS-2

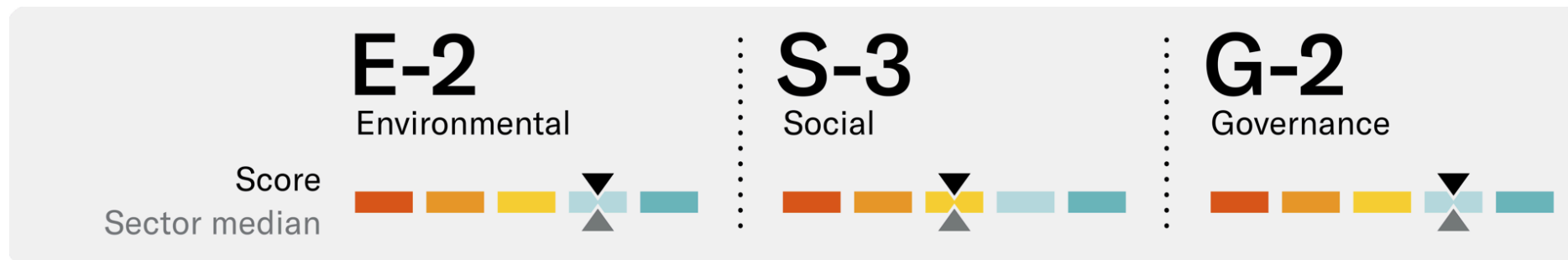
Exhibit 13



Source: Moody's Ratings

The ESG CIS of CIS-2 reflects a limited impact from environmental, social and governance factors on the rating. The covered bond rating would not be higher in the absence of ESG considerations.

Exhibit 14



Source: Moody's Ratings

Environmental

The Environmental IPS of E-2 reflects low exposure to environmental risks across all categories. Although the bank supporting the transaction may have exposure to carbon-intensive counterparties and hydrocarbon-reliant sectors, the residential mortgage assets' exposure to carbon transition will be gradual, with portfolios evolving over time.

Social

The Social IPS of S-3 reflects the transaction's exposure to demographic and societal trends. Social concerns in Europe related to housing and consumer protection give rise to the risk that borrower-friendly measures such as eviction bans, foreclosure limitations, and payment moratoriums could impair mortgage loan repayments.

Governance

The Governance IPS of G-2 reflects the Governance IPS of the bank supporting the transaction as well as the governance support inherent in the jurisdiction's covered bond framework. The covered bond legal framework provides for supervision by regulatory authorities, management of the cover pool if the issuer is insolvent, reporting requirements, and restrictions on asset selection.

The German covered bond legal framework contains strong mechanisms and third-party oversight that provides material credit benefits to investors. The regulatory framework includes frequent close supervision by regulatory authorities that conduct regular audits as well as an independent cover pool monitor responsible for checking and registering cover pool assets and approving removals. There is also a framework for separate management of the programme on or before issuer insolvency by transferring the programme to a stand-alone operating entity managed by a court-appointed cover pool administrator. The administrator has wide powers to maximise asset values and a duty to ensure timely payment of covered bonds.

ESG Issuer Profile Scores and Credit Impact Scores for the rated entity/transaction are available on <http://www.moody.com>. In order to view the latest scores, please go to the landing page for the entity/transaction and view the ESG Scores section.

Methodology and monitoring

The primary methodology we use in rating the issuer's covered bonds is "[Rating Methodology - Covered Bonds](#)", published in February 2025. Other methodologies and factors that may have been considered in the rating process can also be found on <http://www.moody's.com>. In addition, we publish a weekly summary of structured finance credit, ratings and methodologies, available to all registered users of our website, at www.moody's.com/SFQuickCheck.

We expect the issuer to deliver certain performance data to us on an ongoing basis. In the event that this data is not made available to us, our ability to monitor the ratings may be impaired. This lack of data availability could negatively impact the ratings or, in some cases, our ability to continue to rate the covered bonds.

Appendix: Income underwriting and valuation

Exhibit 15

Income underwriting and valuation - Residential assets

A. Residential Income Underwriting																
1 Is income always checked?	Yes															
2 Does this check ever rely on income stated by borrower ("limited income verification") ?	No. Appropriate evidence is always requested and suitable documents will be checked.															
3 Percentage of loans in Cover Pool that have limited income verification	None															
4 If limited income verification loans are in the Cover Pool, describe what requirements lender has in place for these loans.	Limited income verification loans are not included in the cover pool															
5 Does income in all cases constrain the amount lent (for example through some form of Income Sufficiency Test ("IST"))?	An income/expenditure statement is always prepared taking into account the minimum costs (living expenses and operating costs)															
6 If not, what percentage of cases are exceptions.	None															
For the purpose of any IST:																
7 Is it confirmed that income after tax is sufficient to cover both interest and principal?	Yes															
8 If so over what period is it assumed principal will be paid (typically on an annuity basis)? Any exceptions?	Redemption is due at the end of the fixed-interest period because all loans have a bullet maturity (so called "Real section Financing"; in German "echte Abschnittsfinanzierungen")															
9 Does the age of the borrower constrain the period over which principal can be amortised?	Repayment is usually required within the statistical life expectancy.															
10 Are any stresses made to interest rates when carrying out the IST? If so when and for what type of products?	No															
11 Are all other debts of the borrower taken into account at the point the loan is made?	Yes															
12 How are living expenses of the borrower calculated? And what is the stated maximum percentage of income (or income multiple if relevant) that will be relied on to cover debt payments. (specify if income is pre or post tax)	Approach through flat-rate living expenses see table below: <table><tr><td></td><td>LTV up to 80 %</td><td>LTV over 80 %</td></tr><tr><td></td><td></td><td>up 100 %</td></tr><tr><td>Single</td><td>EUR 900</td><td>EUR 1.100</td></tr><tr><td>Couple</td><td>EUR 1.150</td><td>EUR 1.350</td></tr><tr><td>per Child</td><td>EUR 250</td><td>EUR 250</td></tr></table>		LTV up to 80 %	LTV over 80 %			up 100 %	Single	EUR 900	EUR 1.100	Couple	EUR 1.150	EUR 1.350	per Child	EUR 250	EUR 250
	LTV up to 80 %	LTV over 80 %														
		up 100 %														
Single	EUR 900	EUR 1.100														
Couple	EUR 1.150	EUR 1.350														
per Child	EUR 250	EUR 250														
Other comments																
B. Residential Valuation																
1 Are valuations based on market or lending values?	The valuation is based on the mortgage lending value (determined in accordance with the Regulation on the determination of mortgage lending values of properties according with § 16 pars. 1 an 2 of the Pfandbrief Act ("Beleihungswertermittlungsverordnung"-BelwertV).															
2 Are all or the majority of valuations carried out by external valuers (with no direct ownership link to any company in the Sponsor Bank group)?	No. All valuations are conducted by BKM real estate appraisers which are sufficiently trained and qualified to determine the mortgage lending value in accordance with the requirements of § 24 par 2 BelwertV.															
3 How are valuations carried out where an external valuer not used?	The valuations are carried out by internal real estate appraisers in accordance with the requirements of § 24 BelwertV as a so called simplified valuation.															
4 What qualifications are external valuers required to have?	n/a															
5 What qualifications are internal valuers required to have?	Real estate appraisers must be adequately trained and qualified to determine the mortgage lending value in accordance with the requirements of § 24 par 2 BelwertV. Since 2023 new real estate appraisers working at BKM must have the qualification as Valuer in the small loan area for residential properties certified by the HypZert GmbH.															
6 Do all external valuations include an internal inspection of a property?	n/a															
7 What exceptions?	n/a															
8 Do all internal valuations include an internal inspection of a property?	Yes															
9 What exceptions?	None															
Other comments																

Source: Issuer

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