

Final CRR Assessment (non-ABCP)

In respect of the transaction “**Avanzia Master Issuer S.à r.l., acting in respect of its Compartment 2**”

(Avanzia Bank S.A.)

18 May 2026



Authorization of SVI as third party

STS Verification International GmbH ("SVI") has been authorized by the German Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, "BaFin"), as the competent authority pursuant to Article 29 of the Securitisation Regulation, to act in all EU countries as third party pursuant to Article 28 of the Securitisation Regulation to verify compliance with the STS Criteria pursuant to Articles 18 to 26e of the Securitisation Regulation ("STS Verification"). Moreover, SVI performs additional services including the verification of compliance of securitisations with (i) Article 243 of Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (Capital Requirements Regulation or "CRR") ("CRR Assessment"), (ii) Article 270 (senior positions in synthetic SME securitisations) of the CRR ("Article 270 Assessment"), (iii) Article 13 of the Delegated Regulation (EU) 2018/1620 on liquidity coverage requirement for credit institutions dated 13 July 2018, amending Delegated Regulation (EU) 2015/61 to supplement Regulation (EU) No 575/2013 of the European Parliament and the Council with regard to liquidity coverage requirements for Credit Institutions ("LCR") ("LCR Assessment"), and (iv) the STS Criteria, in respect of existing securitisations and potential deficiencies regarding compliance with the STS Criteria ("Gap-Analysis").

Mandating of SVI and verification steps

On 17 June 2025, SVI has been mandated by the Originator (Avanzia Bank S.A.) to verify compliance with Article 243 (2) of the CRR for the securitisation transaction "Avanzia Master Issuer S.à r.l., acting in respect of its Compartment 2" (the "Transaction").

As part of our verification work, we have met with representatives of Avanzia Bank S.A. to conduct a virtual due diligence meeting on 19 March 2025. We have also obtained an updated Due Diligence Presentation as of March 2026 relating to the Transaction. In addition, we have discussed selected aspects of the Transaction with Avanzia Bank S.A., legal counsel and other involved parties and obtained additional information on the transaction structure, the underwriting and servicing procedures of Avanzia Bank S.A. and the underlying Transaction Documents and Programme Documents.

For the purposes of this Final CRR Assessment, we have reviewed the following documents and other information related to the Transaction:

- Prospectus
- Incorporated Terms Memorandum
- Receivables Purchase Agreement
- Funding Incorporated Terms Memorandum
- Additional information received by e-mail, such as confirmations, comments, etc.

Verification Methodology

The fulfilment of each verification point in this Final CRR Assessment provided to the Originator is evaluated based on the three fulfilment values (traffic light status):

Criterion is fully met	
Criterion is mostly met, but with comments or requests for missing information	
Criterion not (yet) met based on available information	

Disclaimer of SVI

SVI grants a registered verification label “verified – STS VERIFICATION INTERNATIONAL” if a securitisation complies with the requirements for simple, transparent and standardised securitisation as set out in Articles 18 to 26e of the Securitisation Regulation ("STS Requirements"). The same registered verification label is used by SVI in the context of a CRR Assessment, Article 270 Assessment, LCR Assessment and Gap-Analysis. The aim of the Securitisation Regulation is to restart high-quality securitisation markets, and the intention of implementing a framework for simple, transparent and standardised transactions with corresponding STS criteria shall contribute to this. However, it should be noted that the STS verification performed by SVI does not affect the liability of an originator or special purpose vehicle in respect of their legal obligations under the Securitisation Regulation. Furthermore, the use of verification services from SVI shall not affect the obligations imposed on institutional investors as set out in Article 5 of the Securitisation Regulation or set out in the CRR, LCR and other relevant regulations, respectively. Notwithstanding confirmation by SVI, which verifies compliance of a securitisation with the STS Requirements, such verification by SVI does not ensure the compliance of a securitisation with the general requirements of the Securitisation Regulation.

SVI has carried out no other investigations or surveys in respect of the originator, issuer or the notes concerned other than as set out in this Final CRR Assessment and disclaims any responsibility for monitoring the originator’s or Issuer’s continuing compliance with these standards or any other aspect of the issuer’s activities or operations. Furthermore, SVI has not provided any form of advisory, audit or equivalent service to the Originator, Issuer or Sponsor.

SVI is not a legal advisor and nothing in the Final CRR Assessment shall be regarded as legal advice in any jurisdiction.

Accordingly, the Final CRR Assessment is only an expression of opinion by SVI after application of its verification methodology and not a statement of fact. It is not a guarantee or warranty that ECB, any of the ESAs or national competent authorities, courts, investors or any other person will accept the STS status of the relevant securitisation. Therefore, no person should rely on the Final CRR Assessment in determining the STS status but must perform its own analysis and reach its own conclusions.

SVI assumes due performance of the contractual obligation thereunder by each of the parties and the representations made and warranties given in each case by any persons or parties to SVI or in any of the documents are true, not misleading and complete. SVI shall have no liability for any loss of any kind suffered by any person as a result of a securitisation where the Final CRR Assessment indicated that it met, in whole or in part, the STS Requirements, certain CRR or SRT requirements being held for any reason as not so meeting the relevant requirements or not being able to have lower capital allocated against it save in the case of deliberate fraud by SVI. SVI shall also not have any liability for any action taken or action from which any person has refrained from taking as a result of the Final CRR Assessment.

LIST OF ABBREVIATIONS/DEFINITIONS

Note: For any other term used in this Final CRR Assessment in capital spelling, please refer to the defined terms in Clauses 1 “DEFINITIONS” of the Incorporated Terms Memorandum and the Funding Incorporated Terms Memorandum.

Avanzia Bank	Avanzia Bank S.A.
Arrangers	BofA Securities Europe S.A. and Natixis
BaFin	Bundesanstalt für Finanzdienstleistungsaufsicht (German Federal Financial Supervisory Authority)
CSSF	Commission de Surveillance du Secteur Financier (Financial Supervisory Authority in Luxembourg)
Closing Date	18 May 2026
CMBS	Commercial Mortgage-Backed Securitisation
CRR	Capital Requirements Regulation (Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms, as amended by Regulation (EU) 2027/2401 of 12 December 2017, Regulation (EU) 2021/558 of 31 March 2021 and further amended from time to time
CRR3	Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024, amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor
Due Diligence Presentation	Due Diligence Presentation dated March 2026
EBA	European Banking Authority
EBA Guidelines	Final Report on Guidelines on the STS criteria for non-ABCP securitisation, as published by EBA on 12 December 2018, as amended by the Final Report on Guidelines on the STS criteria for synthetic on-balance-sheet securitisation and amending Guidelines EB/GL/2018/08 and EB/GL/2018/09 on the STS criteria for ABCP and non-ABCP securitisation, as published by EBA on 27 May 2024 and effective from 9 December 2024
ECB	European Central Bank
EIOPA	European Insurance and Occupational Pensions Authority

ESAs	European supervisory authorities (EBA, EIOPA and ESMA)
ESMA	European Securities and Markets Authority
Final Verification Report	Final Verification Report prepared by SVI in respect of the Transaction
Initial Cut-Off Date	3 November 2025
Initial Purchase Date	13 November 2025
Issuer	Avanzia Master Issuer S.à r.l., acting for and on behalf of its Compartment 2 (Public Notes A of the Master Issuer)
Master Issuer	Avanzia Master Issuer S.à r.l.
Originator	Avanzia Bank S.A.
Prospectus	Prospectus dated 13 May 2026
Public Series 1 Investor	Issuer and Public Notes A of the Master Issuer
Purchaser	Receivables AOE Issuer
Receivables AOE Issuer	Avanzia Invest S.à r.l., acting for and on behalf of its Compartment 1
RMBS	Residential Mortgage-Backed Securitisation
RPA	Receivables Purchase Agreement
Securitisation Regulation	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, as amended by Regulation (EU) 2021/557 of 31 March 2021
Seller	Avanzia Bank S.A.
Servicer	Avanzia Bank S.A.
SME	Small and medium-sized enterprises

SSPE	Securitisation Special Purpose Entity or Issuer
STS Requirements	The requirements for simple, transparent and standardised securitisation in respect of a non-ABCP transaction as set out in Articles 19 to 22 of the Securitisation Regulation
Transaction	The securitisation of credit card receivables (Public Series 1) involving Advanzia Master Issuer S.à r.l., acting for and on behalf of its Compartment 2, as Issuer

#	Criterion Article 243 (2)	CRR Assessment
1	Qualification of the securitisation position as STS securitisation	<u>Verification Method:</u> Legal / Regulatory The Transaction and therefore also the Securitisation Position will be notified according to Article 27 (1) of the Securitisation Regulation by the Originator to ESMA as meeting the requirements of Articles 20 – 22 of the Securitisation Regulation in respect of non-ABCP securitisations, see Section “REGULATORY DISCLOSURE”, Subsection “Compliance with STS Requirements” in the Prospectus. Please also refer to the Final Verification Report prepared by SVI in respect of the Transaction.

#	Criterion Article 243 (2) (a)	CRR Assessment
2	Granularity of the securitised portfolio in terms of single obligor concentrations	<u>Verification Method:</u> Legal At the time of inclusion in the securitisation, the total amount of Purchased Receivables assigned resulting from Credit Card Contract with one and the same Customer (group of connected clients) will not exceed 2% of the aggregate principal amount in respect of any single Customer as at the initial Cut-Off Date and any Additional Cut-Off Date and Purchase Date, as confirmed by the Seller, see Schedule 1 “FORM OF OFFER”, Item 7.1 of the RPA. The underlying exposures represent Loan Agreements and/or Related Claims and Rights and do not include any securitised residual leasing values. Hence, Article 243 (2) (a) 2nd Paragraph of the CRR is not applicable to the Transaction.

#	Criterion Article 243 (2) (b)	CRR Assessment
3	Maximum risk weight under the Standardised Approach	<u>Verification Method:</u> Regulatory / Legal / Due Diligence None of the underlying exposures are secured by residential mortgages or commercial mortgages, therefore Article 243(2) (b) (i) and (ii) are not applicable. The underlying Credit Card Contracts have been entered into exclusively with Customer, which are natural persons. Each of them is resident in Germany and none of them is - to the best of the Seller’s or Servicer’s knowledge - a credit-impaired Customer, please refer to Schedule 3 “ACCOUNT ELIGIBILITY CRITERIA”, Items (9) and (10) of the RPA.

		The portfolio contains Credit Card Contract that have been entered with Customers that fall into the 'retail exposure' category of Article 243(2) (b) (iii) as, according to Article 123 of the CRR, as: a) each exposure is to natural persons, see Schedule 3 "ACCOUNT ELIGIBILITY CRITERIA", Item (10) of the RPA b) each exposure is one of a significant number of exposures with similar characteristics, see #11-13 of the Final Verification Report and c) the total amount owed by each obligor client or group of connected clients does not exceed EUR 1 million. As a result, these retail exposures would have a risk weight of 75% under the Standardised Approach, see Schedule 1 "FORM OF OFFER", Item 7.2 of the RPA. Therefore, the underlying exposures meet the conditions for being assigned under the Standardised Approach and taking into account any eligible credit risk mitigation, a risk weight equal to or smaller than 75% for retail exposures in accordance with Article 123 of the CRR, on an individual exposure basis.
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#	Criterion Article 243 (2) (c)	CRR Assessment
4	Inclusion of loans secured by lower ranking security rights for RMBS and CMBS	<u>Verification Method</u>: Legal / Due Diligence The Eligibility Criteria restrict the underlying exposures to Purchased Receivables under Credit Card Contracts – therefore, residential or commercial mortgage loans do not form part of the portfolio, please refer to 123 of the CRR, each exposure is to natural persons, see Schedule 3 "ACCOUNT ELIGIBILITY CRITERIA" of the RPA.

#	Criterion Article 243 (2) (d)	CRR Assessment
5	Maximum loan-to-value for RMBS	<u>Verification Method</u>: Legal / Due Diligence The Eligibility Criteria restrict the underlying exposures to Purchased Receivables under Credit Card Contracts – therefore, residential or commercial mortgage loans do not form part of the portfolio, please refer to 123 of the CRR, each exposure is to natural persons, see Schedule 3 "ACCOUNT ELIGIBILITY CRITERIA" of the RPA.

As a result of the verifications documented above, we confirm to **Avanzia Bank S.A.** that the requirements pursuant to Article 243 (2) of the CRR, have been fulfilled for the transaction “**Avanzia Master Issuer S.à r.l., acting for and on behalf of its Compartment 2**”.

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