

Preliminary LCR Assessment

In respect of the Transaction “**VCL 49**”
(Volkswagen Leasing GmbH)

27 August 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 29 July 2026, SVI has been mandated by the Originator (Volkswagen Leasing GmbH) to verify compliance with Article 13 of the LCR for the securitisation transaction "**VCL 49**" (the "Transaction").

As part of our verification work, we have met with representatives of Volkswagen Leasing GmbH ("VWL") and Volkswagen Financial Services AG ("VWFS") to conduct an onsite due diligence meeting ("Due Diligence") in Braunschweig on 13 May 2026. In addition, we have discussed selected aspects of the Transaction with VWL, VWFS and legal counsel and obtained additional information on the transaction structure, the underwriting and servicing procedures of VWL and the underlying Transaction Documents.

For the purposes of this Preliminary LCR Assessment, we have reviewed the following (draft) documents and other information related to the Transaction:

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

Verification Methodology

The fulfilment of each verification point in this Preliminary LCR 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 Preliminary LCR 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 Preliminary LCR Assessment shall be regarded as legal advice in any jurisdiction.

Accordingly, the Preliminary LCR 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 Preliminary LCR 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 Preliminary LCR Assessment indicated that it met, in whole or in part, the STS Requirements, certain LCR 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 Preliminary LCR Assessment.

LIST OF ABBREVIATIONS/DEFINITIONS

Note: For any other term used in this Preliminary LCR Assessment in capital spelling, please refer to the defined terms in the Section “MASTER DEFINITIONS SCHEDULE” in the Prospectus.

BaFin	Bundesanstalt für Finanzdienstleistungsaufsicht (German Federal Financial Supervisory Authority)
Closing Date	[26 October] 2026
CRR	Regulation (EU) 2017/2401 dated 12 December 2017, amending Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms, as amended by Regulation (EU) 2021/558 of 31 March 2021
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
ECB	European Central Bank
ECAI	External credit assessment institution
ESMA	European Securities and Markets Authority
Final Verification Report	Final Verification Report prepared by SVI in respect of the Transaction
Fitch	Fitch Ratings – a branch of Fitch Ratings Ireland Limited
HQLA	High Quality Liquid Assets
Issuer	VCL Multi-Compartment S.A, acting for and on behalf of its Compartment VCL 49
LCR	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
Moody's	Moody's Deutschland GmbH
Originator	Volkswagen Leasing GmbH, a direct wholly owned subsidiary of Volkswagen Bank GmbH
Preliminary Verification Report	Preliminary Verification Report prepared by SVI in respect of the Transaction
RPA	Receivables Purchase Agreement
Scope	Scope Ratings GmbH

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	Volkswagen Leasing GmbH
Servicer	Volkswagen Leasing GmbH
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 auto lease receivables involving VCL 49 as Issuer
VCL 49	VCL Multi-Compartment S.A., acting for and behalf of its Compartment VCL 49
VWFS	Volkswagen Financial Services AG
VWL	Volkswagen Leasing GmbH

#	Criterion Article 13, Paragraph 1 of the LCR	LCR Assessment
1	Qualification of the securitisation position as STS securitisation and fulfilment of additional criteria	<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 19 to 22 of the Securitisation Regulation in respect of non-ABCP securitisations, see Section "Article 7 and Article 22 of the Securitisation Regulation" in the Prospectus. Please also refer to the Preliminary Verification Report prepared by SVI in respect of the Transaction. The additional criteria laid down in paragraph 2 and paragraphs 10 to 13 of Article 13 of the LCR are met, please refer below to #2-8.

#	Criterion Article 13, Paragraph 2 (a) of the LCR	LCR Assessment
2	Credit Rating of the securitisation position	<u>Verification Method</u>: Legal / Due Diligence The Class A Notes to be issued by the Issuer are expected to be assigned [AAA]sf by Fitch, [Aaa](sf) by Moody's and [AAA]sf by Scope, see Section "TRANSACTION OVERVIEW", Subsection "THE NOTES", Paragraph "Ratings" of the Prospectus. Fitch, Moody's and Scope have the status of a nominated ECAI. Hence, the Securitisation Position will be assigned a credit assessment of credit quality step 1 (AAA or equivalent) by a nominated ECAI in accordance with Article 264 of Regulation (EU) No 575/2013.

#	Criterion Article 13, Paragraph 2 (b) of the LCR	LCR Assessment
3	Most senior tranche of the securitisation	<u>Verification Method:</u> Legal The Securitisation Position is the most senior tranche issued by the Issuer under the Transaction and possesses the highest level of seniority at all times during the ongoing life of the Transaction, please refer to the Section "OVERVIEW OF THE TERMS AND CONDITIONS OF THE NOTES" of the Prospectus. The Class A Notes represent the most senior tranche given that, following the occurrence of an Enforcement Event, the Class A Notes are not subordinated to other tranches (in particular the Class B Notes) of the Transaction in respect of receiving principal and interest payments, see the Post-Enforcement Priority of Payments following the occurrence of an Enforcement Event (please refer to Section "OVERVIEW OF THE TERMS AND CONDITIONS OF THE NOTES", Subsection "Order of Priority of Distributions" of the Prospectus).

#	Criterion Article 13, Paragraph 2 (g) of the LCR	LCR Assessment
4	Homogeneity requirements	<u>Verification Method:</u> Legal / Data The Securitisation Position is backed by a pool of homogeneous underlying exposures, which all belong to only one subcategory, namely 'auto loans and leases to borrowers or lessees established or resident in a Member State (Germany)', please refer to Article 13, paragraph 2 (g) (iv) of the LCR. According to Clauses 2.2, 3.2 and 7.1 of the RPA, VWL transfers to the Issuer title for security purposes (<i>Sicherungsübereignung</i>) to the Leased Vehicles specified by their vehicle identification number (<i>Fahrgestellnummer</i>), as security for the Issuer's current and future claims against VWL arising in connection with the acquired Purchased Lease Receivables. Hence, the requirement of Article 13, paragraph 2 (g) (iv) of the LCR that "<i>All loans and leases in the pool shall be secured with a first-ranking charge or security over the vehicle or an appropriate guarantee in favour of the SSPE, such as a retention of title provision</i>" is fulfilled.

#	Criterion Article 13, Paragraph 10 of the LCR	LCR Assessment
5	Securitisation position not held by the credit institution or group company that originated the underlying exposures	<u>Verification Method</u>: Legal / Due Diligence The underlying exposures have been originated by Volkswagen Leasing GmbH acting as Originator. For the purpose of compliance with this requirement, it is assumed that the credit institution holding the Securitisation Position in its liquidity buffer is not the Originator, any of its subsidiaries, its parent undertaking, a subsidiary of its parent undertaking or any other undertaking closely linked with the Originator.

#	Criterion Article 13, Paragraph 11 of the LCR	LCR Assessment
6	Requirement regarding Tranche Size	<u>Verification Method</u>: Legal The Nominal Amount of the Class A Notes is expected to amount to EUR [●] million, hence the issue size of the tranche amount is at least EUR 100 million (or the equivalent amount in domestic currency). The Originator confirmed that the amount of the Class A Notes will be at least EUR 100 million.

#	Criterion Article 13, Paragraph 12 of the LCR	LCR Assessment
7	Requirements regarding Weighted Average Life of the securitisation position	<u>Verification Method</u>: Legal / Data Under all Prepayment Rate assumptions for the Transaction (0% to 10%), the remaining weighted average life of the Class A Notes is in each case less than 5 years, see Section "Weighted Average Lives of the Notes/Assumed Amortisation of the Purchased Lease Receivables and Notes", Subsection "Weighted Average Lives of the Notes" of the Prospectus.

#	Criterion Article 13, Paragraph 13 of the LCR	LCR Assessment
8	Requirements regarding the Originator	<u>Verification Method</u>: Legal / Due Diligence The Originator is not a credit institution as defined in Article 4 (3) of the CRR but pursues one or more of the activities listed in points 2 to 12 and point 15 of Annex I to Directive 2013/36/EU, namely 'Financial Leasing' (point 3).

#	Criterion Article 37 of the LCR	LCR Assessment
9	Transitional provisions for RMBS	<u>Verification Method</u>: Legal The securitised exposures consist exclusively of auto lease receivables, hence the exceptions for residential mortgages regarding loan-to-value or loan-to-income requirements do not apply.

As a result of the verifications documented above, we confirm to **Volkswagen Leasing GmbH** that the requirements pursuant to Article 13 of the LCR have been fulfilled for the transaction “**VCL 49**”.

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