

Transaction Update: Caisse Francaise de Financement Local (Public Sector Covered Bonds)

Obligations Foncières Backed By Public Sector Assets

Primary Credit Analyst:

Alice Delemarle-Charton, CFA, London (44) 20-7176-3594; alice.delemarle@spglobal.com

Research Contributor:

Parashar Tendolkar, CRISIL Global Analytical Center, an S&P affiliate, Mumbai

Table Of Contents

Major Rating Factors

Outlook: Stable

Rationale

Program Description

Rating Analysis

Additional Rating Factors

Related Criteria

Related Research

Transaction Update: Caisse Francaise de Financement Local (Public Sector Covered Bonds)

Obligations Foncières Backed By Public Sector Assets

Ratings Detail

| | | | | | | | | | | |
|-------------------------------|-------------|---|--|-------------|---|---|------------|---|----------------------------|-----|
| Reference Rating Level | aa | + | Jurisdiction-Supported Rating Level | aa | + | Maximum Achievable Covered Bond Rating | aa+ | = | Covered Bond Rating | |
| Resolution Regime Uplift | +2 | | Assigned Jurisdictional Support Uplift | 0 | | Collateral Support Uplift | +1 | | AA+/Stable | |
| Systemic Importance | Very Strong | | Jurisdictional Support Assessment | Very Strong | | Overcollateralization Adjustment | -1 | | Rating Constraints | aa+ |
| Adjusted Issuer Credit Rating | bbb+ | | Legal Framework | Very Strong | | Liquidity Adjustment | 0 | | Counterparty Risk | aa+ |
| GRE And Sovereign Support | +5 | | Systemic Importance | Very Strong | | Potential Collateral Based Uplift | +2 | | Country Risk | aaa |
| Issuer Credit Rating | AA | | Sovereign Credit Capacity | Very Strong | | | | | | |

*We apply the notches of uplift to the long-term rating on SFIL, to which we consider CaFFiL to be a core entity, to derive the ratings on the covered bonds.

Major Rating Factors

| Strength | Weaknesses |
|--|---|
| <ul style="list-style-type: none">• Very high issuer credit rating (ICR) as a starting point for our notching up analysis. | <ul style="list-style-type: none">• Available credit enhancement is only sufficient to support one notch of uplift above the long-term ICR on Caisse Francaise de Financement Local SCF's (CaFFiL) parent bank, SFIL.• Counterparty risks constrain the covered bond ratings to one notch above the long-term ICR on SFIL and introduce a weak-link to the long-term rating on Banque de France (BdF). |

Outlook: Stable

The stable outlook on our covered bond ratings reflects the stable outlook on SFIL (AA/Stable/A-1+). We would automatically lower our ratings on the covered bonds should we lower our rating on SFIL, or if the available credit enhancement were to drop below the level that is commensurate with 'AA+' ratings. We would raise our ratings on the covered bonds if we raised our long-term rating on SFIL and the available credit enhancement led to two notches of collateral-based uplift.

Rationale

We are publishing this transaction update following our annual review of CaFFiL's legislation-enabled public sector covered bond program.

In our analysis, we assume that the issuer's parent has defaulted and look to the resolution regime, the jurisdictional support, and the cover pool to repay the covered bonds. The ratings reflect the likelihood of the covered bonds being repaid in a timely manner on their legal final maturity.

From our analysis of the legal and regulatory framework for covered bonds in France, we have concluded that the assets in the cover pool are isolated from the risk of the bankruptcy or insolvency of SFIL. This asset isolation allows us to assign a higher rating to the covered bonds than our long-term ICR on SFIL.

SFIL is domiciled in France, which applies the EU's Bank Recovery and Resolution Directive (BRRD). We assess the systemic importance of covered bonds in France as very strong, under our "Assessments For Jurisdictional Support According To Our Covered Bonds Criteria," published on Oct. 16, 2018. A successful resolution of the issuer's parent increases the likelihood that the issuer would continue servicing its covered bonds without accessing the cover pool or receiving jurisdictional support, even following a bail-in of SFIL's senior unsecured obligations.

Our assessment of the expected jurisdictional support for CaFFiL SCF's covered bond program--which is primarily backed by French public sector loans--is very strong. This could result in a potential uplift from the reference rating level (RRL) of up to three notches (see "Covered Bonds Criteria," published on Dec. 9, 2014). However, the number of notches of uplift is constrained to the rating level on the sovereign.

Based on information as of June 30, 2018, our analysis shows that the available credit enhancement--12.20%--is in line with one notch of collateral uplift, at 9.00%, but below the 'AAA' target credit enhancement of 18.91%. The covered bonds can therefore achieve a 'AA+' rating from a cash flow perspective.

Furthermore, our ratings on the covered bonds are capped at 'AA+', one notch above the RRL from a counterparty risk perspective.

One currently outstanding market-linked note carries a 'p' subscript, in accordance with our criteria "Principles For Rating Debt Issues Based On Imputed Promises," published on Dec. 19, 2014.

The criteria for rating covered bonds are outlined in "Covered Bond Ratings Framework: Methodology And Assumptions," published on June 30, 2015.

Program Description

Under the program term, CaFFiL issues covered bonds (obligations foncières), which are backed by a pool of exposures to public sector assets. As a société de crédit foncier (SCF), CaFFiL is regulated.

The program was first established in 1999 as Dexia Municipal Agency, an entity of Dexia Credit Local. In 2013, Dexia Municipal Agency was sold to the new Société de Financement Local (SFIL) and the covered bond program, which from then on was entirely independent from Dexia Credit Local, was renamed CaFFiL. This change in name and ownership did not affect its status as an SCF. CaFFiL is therefore the refinancing arm of SFIL and as such fulfills a public role of providing affordable financing to French local authorities and, more recently, and still to a much lesser extent, to support large French export contracts.

Table 1

| Program Overview* | |
|---|---------------------|
| Jurisdiction | France |
| Year of first issuance | 1999 |
| Covered bond type | Legislation-enabled |
| Outstanding covered bonds (bil. €) | 51.31 |
| Redemption profile | Hard bullet |
| Underlying assets | Public sector loans |
| Jurisdictional support uplift | 0 |
| Unused notches for jurisdictional support | 0 |
| Target credit enhancement (%) | 18.91 |
| Minimum credit enhancement for 'AAA' rating (%) | 15.51 |
| Credit enhancement commensurate with 'AA+' rating (%) | 9.00 |
| Available credit enhancement (%) | 12.20 |

Table 1

| Program Overview* (cont.) | |
|---------------------------------------|---|
| Collateral support uplift | 1 |
| Unused notches for collateral support | 0 |
| Total unused notches | 0 |

*As of June 30, 2018.

Table 2

| Program Participants | | | |
|-----------------------------|--|---------------|--------------------------|
| Role | Name | Rating | Rating dependency |
| Originator | SFIL | AA | N |
| Originator | La Banque Postale | A | N |
| Issuer | CaFFiL | AA | Y |
| Bank account provider | Banque de France* | NR | Y |
| Bank account provider | Trésor Public (French sovereign) | AA | N |
| Bank account provider | Natixis S.A. | A+ | N |
| Bank account provider | La Banque Postale | A | N |
| Bank account provider | Banque Internationale à Luxembourg | A- | N |
| Bank account provider | Citibank NA | A+ | N |
| Bank account provider | Skandinaviska Enskilda Banken AB (publ) | A+ | N |
| Bank account provider | Belfius Bank SA/NV | A- | N |
| Custodian | Société Générale Securities Services Luxembourg | NR | N |
| Swap counterparty | SFIL | AA | Y |
| Swap counterparty | Banco Santander SA | A | Y |
| Swap counterparty | ING Belgium NV | A+ | Y |
| Swap counterparty | Royal Bank of Canada | AA- | Y |
| Swap counterparty | Société Générale | A | N |
| Swap counterparty | Natixis S.A. | A+ | N |
| Swap counterparty | Natwest Markets PLC | BBB+ | N |
| Swap counterparty | BNP Paribas SA | A | Y |
| Swap counterparty | JP Morgan Dublin Plc | NR | N |
| Swap counterparty | JP Morgan Chase Bank NA | A+ | N |
| Swap counterparty | Crédit Agricole Corporate and Investment Bank | A+ | N |
| Swap counterparty | Belfius Bank SA/NV | A- | N |
| Swap counterparty | Credit Suisse International | A | N |
| Swap counterparty | Deutsche Bank AG | BBB+ | N |
| Swap counterparty | Barclays Bank PLC | A | N |
| Swap counterparty | HSBC France | AA- | N |
| Swap counterparty | Morgan Stanley Capital Services LLC | A+ | N |
| Swap counterparty | Citibank NA | A+ | N |
| Swap counterparty | UBS Ltd. | A+ | N |
| Swap counterparty | Unicredit Bank AG | BBB+ | N |
| Swap counterparty | Goldman Sachs Mitsui Marine Derivative Products LP | AA- | N |
| Swap counterparty | Merrill Lynch International Bank Ltd. | A+ | N |
| Swap counterparty | DZ BANK AG | AA- | N |

Table 2

| Program Participants (cont.) | | | |
|-------------------------------------|-------------------------------|---------------|--------------------------|
| Role | Name | Rating | Rating dependency |
| Swap counterparty | Bank of America NA | A+ | N |
| Swap counterparty | Portigon AG | NR | N |
| Swap counterparty | Landesbank Baden Wuerttemberg | NR | N |

*As long as we believe that France is unlikely to exit the eurozone, we consider Banque de France's credit standing to be indistinguishable from that of the European Central Bank (AAA/Stable/A-1+). NR--Not rated. Y--Yes. N--No.

Rating Analysis

Legal and regulatory risks

Under an SCF program, the issuer, a special-purpose entity licensed as a credit institution, issues "obligations foncières" (OFs), which are unsubordinated senior secured obligations and rank pari passu among themselves. OF-holders have recourse first to the issuer and, second, to the SCF's assets--the cover pool--over which they have a senior claim.

In our view, France's legal framework for OFs, defined in article L513-2 and related articles of the "Code Monétaire et Financier," sufficiently addresses the legal risk considerations highlighted in our covered bonds criteria such as asset isolation and the absence of bond acceleration, enabling us to rate the covered bonds higher than the issuer.

If the issuer becomes insolvent, OFs and other privileged debts, such as swaps, pay in accordance with their payment schedule, ahead of the SCF's other debts or nonprivileged creditors in relation to the SCF's assets.

Our legal analysis is based on our criteria "Asset Isolation And Special-Purpose Entity Methodology," published on March 29, 2017, and our covered bond rating framework criteria.

Operational and administrative risks

SFIL services the cover pool assets, which are recorded separately to ensure segregation from its own assets. Use of the cover pool assets for other purposes is restricted.

We have not identified any operational or administrative risks that would affect our assessment of the program. We consider the servicing and origination procedures to be in line with CaFFiL's peers. In addition, we believe that the bank's management is committed to maintaining an adequate level of overcollateralization (OC) and limiting asset-liability mismatch (ALMM) risk for the covered bonds.

As a regulated entity, CaFFiL is subject to ongoing monitoring of its compliance with legal covenants from the contrôleur spécifique.

Our analysis of operational and administrative risks follows the principles laid out in our covered bonds rating framework criteria.

Resolution regime analysis

SFIL is headquartered in France, a jurisdiction that applies the EU BRRD resolution framework. We assess the systemic importance for French public sector covered bonds as very strong. This assessment means that the RRL can

be two notches above the adjusted long-term ICR (adjusted by removing the uplift allocated to reflect extraordinary government support to the issuer, if any). Under our group rating methodology, we consider the issuer to be a core entity of SFIL, and therefore uplift the rating on the bonds from SFIL's long-term ICR (AA/Stable/A-1+). The rating on SFIL incorporates five notches of uplift for government support so we derive the RRL at 'aa' by flooring it at the ICR.

Jurisdictional support analysis

In our jurisdictional support analysis, we assess the likelihood that a covered bond program facing stress would receive support from a government-sponsored initiative instead of from the liquidation of collateral assets in the open market. We have assessed jurisdictional support for French public-sector covered bonds as very strong, reflecting that the program can receive up to three notches of jurisdictional uplift above the RRL.

However, as the rating on the sovereign (France: unsolicited AA/Stable/A-1+) caps the jurisdiction-supported rating level (JRL), and SFIL is rated at the same level as France, the covered bonds do not benefit from any notch of jurisdictional uplift, resulting in a JRL of 'aa'. Moreover, because SFIL is directly or indirectly 100% owned by the French state and benefits from an almost certain likelihood of extraordinary support from the government, we consider it extremely unlikely that these unused notches could ever be realized and conclude that there is no unused jurisdictional support for ratings uplift.

Collateral support analysis

We analyzed loan level data as of June 30, 2018 and assessed the portfolio's credit quality by applying our criteria for rating covered bonds backed by public sector assets (see "Methodology And Assumptions For Assessing Portfolios Of International Public Sector And Other Debt Obligations Backing Covered Bonds And Structured Finance Securities," published on Dec. 9, 2014).

The pool comprises loans to public sector entities, the majority of which (over 85%) are French (see table 6). The pool also comprises substitute assets: bank bonds, loans to SFIL, and cash (see table 3). Cash is a non-defaulting asset that is not part of our credit analysis.

Table 3

| Cover Pool Composition | | | | |
|-------------------------------|--------------------------------|---------------------------------|--------------------------------|---------------------------------|
| Asset type | --As of June 30, 2018-- | | --As of June 30, 2017-- | |
| | Value (mil. €) | Percentage of cover pool | Value (mil. €) | Percentage of cover pool |
| Public sector | 53,413.55 | 91.00 | 54,957.11 | 92.19 |
| Substitute assets | 1,840.54 | 3.08 | 773.81 | 1.30 |
| Cash | 2,747.28 | 5.92 | 3,885.00 | 6.52 |
| Total value | 58,001.37 | 100 | 59,615.92 | 100 |

We assess asset credit quality using our 'AAA' stressed measure of the level of defaults--the scenario default rate (SDR)--and our measure of recoveries given default. We view French public-sector hospitals as central government-related entities, ruled and supervised by the central government and not by local and regional governments (LRGs). However, if a French hospital were to default on a loan, we expect that the defaulted debt would be restructured in a similar manner to that of an LRG, and would not be as marketable as defaulted sovereign debt. We also consider that French public-sector hospitals are very dependent on central government decisions, due to their

limited revenue flexibility and rigid cost structures. These features similarly characterize French departments, which we assess as category B under our aforementioned criteria. We have therefore assessed our recovery assumptions for French public-sector hospitals as category B.

The SDR has decreased markedly due to an improvement of the credit quality of the assets in the portfolio as well as a shorter weighted average life of the assets, and the recovery rate has remained fairly stable (see tables 4, 5, and 7).

Table 4

| Key Credit Metrics | | |
|--|----------------------------|----------------------------|
| | As of June 30, 2018 | As of June 30, 2017 |
| Public sector loans | | |
| Weighted-average loan asset maturity (years) | 8.27 | 8 |
| 20 largest obligors (% of cover pool) | 14.32 | 14.37 |
| Credit analysis results: | | |
| Scenario default rate (SDR) (%) | 32.78 | 40.75 |
| Weighted-average recovery rate (%) | 79.14 | 80.6 |
| Weighted-average time to recovery (years) | 3.70 | 3.81 |
| Largest obligor test result (% of covered bonds) | 2.96 | 2.72 |
| Largest industry test result (% of covered bonds) | 3.00 | 2.81 |
| Largest sovereign test result (% of covered bonds) | 9.00 | 9.93 |
| Largest T&C test result (% of covered bonds) | 0 | 0 |

N/A--Not applicable. T&C--Transfer and convertibility.

Table 5

| Public Sector And Substitute Assets Distribution By Credit Assumptions | | |
|---|--|----------------------------|
| | Percentage of cover pool excluding cash | |
| | As of June 30, 2018 | As of June 30, 2017 |
| AAA* | 0.03 | 0.02 |
| AA* | 7.18 | 6.12 |
| A* | 19.8 | 17.06 |
| BBB* | 63.24 | 52.68 |
| BB* | 0.39 | 14.53 |
| B or lower* | 9.36 | 9.58 |
| Total | 100 | 100 |

*Aggregated by rating category.

Table 6

| Geographical Distribution | | |
|----------------------------------|--|----------------------------|
| | Percentage of cover pool (excluding cash) | |
| | As of June 30, 2018 | As of June 30, 2017 |
| France | 85.8 | 84.8 |
| Italy | 8.66 | 9.03 |
| Switzerland | 1.9 | 2.59 |
| Spain | 0.62 | 0.71 |

Table 6

| Geographical Distribution (cont.) | | |
|--|----------------------------|----------------------------|
| Percentage of cover pool (excluding cash) | | |
| | As of June 30, 2018 | As of June 30, 2017 |
| U.S. | 0.53 | 0.54 |
| Others | 2.48 | 2.34 |
| Total | 100 | 100 |

Table 7

| | As of June 30, 2018 | | | As of June 30, 2017 | | |
|--|------------------------------|---------------------------------|--------------------------|------------------------------|---------------------------------|--------------------------|
| | AAA recovery rate (%) | Time to recovery (years) | Share of pool (%) | AAA recovery rate (%) | Time to recovery (years) | Share of pool (%) |
| Cat. A LRGs | 90 | 4 | 52.48 | 90 | 4 | 53.15 |
| French municipalities, communes urbaines, commune de communes, commune d'agglomeration | | | 41.97 | | | 43.68 |
| French regions | | | 4.1 | | | 2.57 |
| French social housing | | | 2.2 | | | 2.44 |
| Swiss assets | | | 0.88 | | | 2.4 |
| Other French LRGs | | | 1.59 | | | 0.17 |
| Other non-French LRGs | | | 1.74 | | | 1.89 |
| Cat. B LRGs | 75 | 4 | 40.13 | 75 | 4 | 42.04 |
| French department | | | 12.53 | | | 12.23 |
| French public hospitals | | | 10.83 | | | 11.38 |
| Italian assets (municipalities, region, province) | | | 7.66 | | | 8.03 |
| Other French LRGs | | | 7.81 | | | 9.51 |
| Other non-French LRGs | | | 1.3 | | | 0.9 |
| Sovereigns | 37 | 0 | 2.88 | 37 | 0 | 1.9 |
| France | | | 1.2 | | | 0.38 |
| Italy | | | 1 | | | 1 |
| U.K. | | | 0.29 | | | 0.43 |
| Portugal | | | 0.03 | | | 0.03 |
| Others | | | 0.36 | | | 0.05 |
| Non-LRGs | | | 4.51 | | | 2.92 |
| French non-LRGs secured | 50 | 0 | 0 | 50 | 0 | 0 |
| French non-LRGs unsecured | 18 | 0 | 3.49 | 18 | 0 | 2.44 |
| Other non-LRGs | 18 | 0 | 1.03 | 18 | 0 | 0.48 |
| Total/weighted-average | 79.14 | 3.7 | 100 | 80.59 | 3.81 | 100 |

LRGs--Local and regional governments.

Our analysis of the covered bonds' payment structure shows that the cover pool assets' cash flows would be sufficient to make timely payments of interest and principal to the covered bondholders at a 'AA+' rating level.

We analyze the cash flows under our credit stresses, as well as under liquidity and interest rate stresses. We also run different default timing and prepayment patterns. We assume a servicing fee of 10bps.

The program is exposed to structural limiting asset-liability mismatch risk because its features do not fully address the mismatches in its asset-liability profile. Our model simulates a stressed sale of assets whenever a liquidity gap occurs in our analysis. The discount applied for the assets in the program is 444.2 basis points, on top of the stressed interest rate at the time of the shortfall. This discount is a function of the nature of the assets and is outlined in our "Assessments For Target Asset Spreads According To Our Covered Bonds Criteria" article, published Oct. 16, 2018.

Interest and currency mismatches are covered by swaps which we took into account regardless of whether the swap contracts reflect our current counterparty criteria or not (see our "Counterparty risk" section).

The issuer uses the swap collateral received from counterparties to invest in the cover pool. As such, it is part of our asset cash flows. The issuer would need to return this collateral should rates move in the counterparty's favor or if the counterparty were to be upgraded such that no posting would be required under the documentation. This would result in a liability ranking pari passu with the covered bonds. We do not model this return of collateral in our calculation for the first notch of uplift, however, as we consider that it is captured by the one-notch cap above the RRL, which is currently applied due to unsubordinated swap termination payments (see "Counterparty risk"). We include this return of swap collateral in our 'AAA' target credit enhancement calculation.

There are no structural mechanisms to allocate assets proportionately to each bond or to check for amortization. The bonds are never accelerated. There is therefore a risk of time subordination for bonds with later maturity dates if there is a cash shortfall. Our rating addresses the timely repayment of all bonds. All of the outstanding covered bonds are hard bullet.

Because there is an active secondary market for the assets in the cover pool, the program can potentially benefit from up to four notches of collateral-based uplift above the JRL, although the available credit enhancement currently limits such uplift.

Liquidity risk. We do not apply any adjustment for liquidity risk because the program covers 180 days of liquidity in application of the SCF regulation. The vast majority of assets in the cover pool are repoable with the BdF with which the program is already registered, so that liquidity can be realized immediately from the cover pool.

Overcollateralization commitment The program complies with the 5% regulatory minimum OC but this is not a dynamic figure and is below the OC commensurate with the current rating. We therefore deduct a notch for uncommitted OC from the maximum number of potential notches of uplift, bringing it to three. This means that in order to benefit from one notch of collateral uplift, the program will need to cover 'AAA' credit risk, and to benefit from two notches of collateral uplift, it would need to cover 'AAA' credit risk and 75% of the refinancing costs.

Based on information as of June 30, 2018, our analysis shows that the available credit enhancement of 12.20% covers the credit risk at a 'AAA' level, allowing the program to achieve one notch of uplift above the RRL. The 'AAA' credit risk level is 9.00%, and is driven by our largest sovereign test, reflecting the large portion of Italian assets.

The target credit enhancement of 18.91% has decreased significantly since our last analysis due to much improved default results and a slightly shorter time to recovery.

We analyze cash flow risk according to our criteria for rating covered bonds backed by public-sector assets and our covered bonds criteria.

Table 8

| Collateral Uplift Metrics | | |
|---|---------------------|---------------------|
| | As of June 30, 2018 | As of June 30, 2017 |
| Asset WAM (years) | 8.27 | 8.25 |
| Liability WAM (years) | 6.99 | 6.56 |
| Available credit enhancement | 12.20 | 12.07 |
| Required credit enhancement for coverage of 'AAA' credit risk (%) | 9.00 | 9.93 |
| Coverage of 'AAA' credit risk and 75% of refinancing costs (%) | 15.51 | 24.87 |
| Target credit enhancement for maximum uplift (%) | 18.91 | 31.05 |
| Potential collateral-based uplift (notches) | 2 | 2 |
| Adjustment for liquidity (Y/N) | N | N |
| Adjustment for committed overcollateralization (Y/N) | Y | Y |
| Collateral support uplift (notches) | 1 | 1 |

WAM--Weighted-average maturity.

Additional Rating Factors

Counterparty risk

We have identified several counterparty risks to which the covered bonds could be exposed. Some are structurally addressed, while others are not and therefore constrain the ratings on the bonds to 'AA+'.

Bank accounts. CaFFiL has several bank accounts. Typically these are swept daily, such that CaFFiL does not have an overnight credit exposure to the counterparty. CaFFiL is exposed to the credit risk of the BdF, as it holds cash there in an account that does not have downgrade language that is in line with our criteria. The ratings on the covered bonds are therefore weak-linked to the creditworthiness of BdF. BdF is not publicly rated; however as long as we believe that France is unlikely to exit the eurozone, we consider BdF's credit standing to be indistinguishable from that of the European Central Bank (AAA/Stable/A-1+).

Commingling risk. The covered bonds are exposed to commingling risk stemming from the borrowers' payments to CaFFiL's accounts at commercial banks (which represent about 10% of the borrowers), as they would continue to do so even after the bank's default until instructed to redirect payments. We have therefore sized one month's worth of payment losses for these payments in our cash flow analysis.

Asset and liability swaps. From a counterparty risk perspective, there are three types of swaps in this transaction:

- Swaps with a related entity, SFIL, the documentation of which reflects our current counterparty criteria. We consider that the counterparty risk of these swaps is structurally mitigated and does not constrain the rating on the bonds. We take the hedges into account in our cash flow analysis.
- Swaps with unrelated entities whose documentation reflects a previous version of our counterparty criteria. We analyze these in light of our covered bonds counterparty criteria. Given our long-term ICR, the ratings on the counterparties, and their relative concentration, we take these swaps into account in our cash flow analysis by deducting one notch from the maximum uplift above the RRL, resulting in two notches rather than three. This does not affect the ratings on the covered bonds.

- Swaps with unrelated entities that have no replacement framework. As swap termination payments are not subordinated to the payment on the covered bonds, and as the notional amount of these swaps is currently above the threshold defined in our covered bonds counterparty criteria, we account for the liquidity risk of these potential payments by limiting the ratings on the covered bonds to one notch above our RRL, at 'AA+'. As these swaps already introduce a cap to the ratings, we take the benefit of their hedges into account in our cash flow simulations.

Country risk. There is a material exposure to France within the multi-jurisdictional pool. We consider the assets to have a high sensitivity to country risk, and have applied our sovereign stresses in accordance with our structured finance ratings above the sovereign criteria (see "Ratings Above The Sovereign - Structured Finance: Methodology And Assumptions," published on Aug. 8, 2016). These do not constrain the ratings on the covered bonds. In our previous analysis, country risk introduced a ratings cap at one notch above the unsolicited long-term rating on France.

Potential effects of proposed criteria changes

Our ratings are based on our applicable criteria, including our "Covered Bonds Criteria," published on Dec. 9, 2014, "Counterparty Risk Framework Methodology And Assumptions," published on June 25, 2013, "Counterparty Risk Analysis In Covered Bonds," published on Dec. 21, 2015, and "Ratings Above The Sovereign - Structured Finance: Methodology And Assumptions," published on Aug. 8, 2016.

However, these criteria are under review (see "Request For Comment: Methodology For Incorporating The Effect Of Resolution Regimes Into Covered Bond Ratings," published on Jan. 31, 2017, "Request For Comment: Counterparty Risk Framework: Methodology And Assumptions," published on Oct. 9, 2018, and "Request For Comment: Ratings Above The Sovereign - Structured Finance: Methodology And Assumptions, published on Nov. 20, 2018). As a result of these reviews, we may amend certain paragraphs of our covered bonds criteria and our analysis of counterparty and country risks in a covered bond program. These changes may affect the ratings on the outstanding covered bonds issued under this covered bond program. Until this time, we will continue to rate and surveil these covered bonds using our existing criteria (see "Related Criteria").

Related Criteria

- Legal Criteria: Structured Finance: Asset Isolation And Special-Purpose Entity Methodology, March 29, 2017
- Ratings Above The Sovereign - Structured Finance: Methodology And Assumptions, Aug. 8, 2016
- Global Investment Criteria For Temporary Investments In Transaction Accounts, May 31, 2012
- Global Derivative Agreement Criteria, June 24, 2013
- Counterparty Risk Analysis In Covered Bonds, Dec. 21, 2015
- Counterparty Risk Framework Methodology And Assumptions, June 25, 2013
- Methodology And Assumptions For Assessing Portfolios Of International Public Sector And Other Debt Obligations Backing Covered Bonds And Structured Finance Securities, Dec. 9, 2014
- Principles For Rating Debt Issues Based On Imputed Promises, Dec. 19, 2014
- Covered Bond Ratings Framework: Methodology And Assumptions, June 30, 2015
- Covered Bonds Criteria, Dec. 9, 2014

- Use Of CreditWatch And Outlooks, Sept. 14, 2009
- Methodology: Credit Stability Criteria, May 3, 2010

Related Research

- Global Covered Bond Characteristics And Rating Summary Q4 2018, Dec. 12, 2018
- Global Covered Bond Insights Q4 2018, Dec. 12, 2018
- Request For Comment: Ratings Above The Sovereign - Structured Finance: Methodology And Assumptions, Nov. 20, 2018
- European Economic Snapshots For Q4 Published, Oct. 11, 2018
- Assessments For Jurisdictional Support According To Our Covered Bonds Criteria, Oct. 16, 2018
- Assessments For Target Asset Spreads According To Our Covered Bonds Criteria, Oct. 16, 2018
- Request For Comment: Counterparty Risk Framework: Methodology And Assumptions, Oct. 9, 2018
- Monetary Policy Normalization In The Eurozone: Will One Size Fit All?, June 26, 2018
- SFIL, June 11, 2018
- Covered Bond Monitor: Technical Note, Aug. 20, 2018
- Credit Rating Model: Covered Bond Monitor, April 20, 2018
- Request For Comment: Methodology For Incorporating The Effect Of Resolution Regimes Into Covered Bond Ratings, Jan. 31, 2017

Copyright © 2018 by Standard & Poor's Financial Services LLC. All rights reserved.

No content (including ratings, credit-related analyses and data, valuations, model, software or other application or output therefrom) or any part thereof (Content) may be modified, reverse engineered, reproduced or distributed in any form by any means, or stored in a database or retrieval system, without the prior written permission of Standard & Poor's Financial Services LLC or its affiliates (collectively, S&P). The Content shall not be used for any unlawful or unauthorized purposes. S&P and any third-party providers, as well as their directors, officers, shareholders, employees or agents (collectively S&P Parties) do not guarantee the accuracy, completeness, timeliness or availability of the Content. S&P Parties are not responsible for any errors or omissions (negligent or otherwise), regardless of the cause, for the results obtained from the use of the Content, or for the security or maintenance of any data input by the user. The Content is provided on an "as is" basis. S&P PARTIES DISCLAIM ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE OR HARDWARE CONFIGURATION. In no event shall S&P Parties be liable to any party for any direct, indirect, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs or losses caused by negligence) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related and other analyses, including ratings, and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. S&P's opinions, analyses and rating acknowledgment decisions (described below) are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P assumes no obligation to update the Content following publication in any form or format. The Content should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. S&P does not act as a fiduciary or an investment advisor except where registered as such. While S&P has obtained information from sources it believes to be reliable, S&P does not perform an audit and undertakes no duty of due diligence or independent verification of any information it receives. Rating-related publications may be published for a variety of reasons that are not necessarily dependent on action by rating committees, including, but not limited to, the publication of a periodic update on a credit rating and related analyses.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P reserves the right to assign, withdraw or suspend such acknowledgment at any time and in its sole discretion. S&P Parties disclaim any duty whatsoever arising out of the assignment, withdrawal or suspension of an acknowledgment as well as any liability for any damage alleged to have been suffered on account thereof.

S&P keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of S&P may have information that is not available to other S&P business units. S&P has established policies and procedures to maintain the confidentiality of certain non-public information received in connection with each analytical process.

S&P may receive compensation for its ratings and certain analyses, normally from issuers or underwriters of securities or from obligors. S&P reserves the right to disseminate its opinions and analyses. S&P's public ratings and analyses are made available on its Web sites, www.standardandpoors.com (free of charge), and www.ratingsdirect.com and www.globalcreditportal.com (subscription), and may be distributed through other means, including via S&P publications and third-party redistributors. Additional information about our ratings fees is available at www.standardandpoors.com/usratingsfees.

STANDARD & POOR'S, S&P and RATINGSDIRECT are registered trademarks of Standard & Poor's Financial Services LLC.