

## NEW ISSUE REPORT

## MBS Bancaja 7, Fondo de Titulización de Activos

RMBS/Spain

## Closing Date

23 July 2010

## Table of Contents

DEFINITIVE RATINGS	1
ASSET SUMMARY	1
ASSET SUMMARY (CONTINUED)	2
LIABILITIES, CREDIT ENHANCEMENT AND LIQUIDITY	2
COUNTERPARTIES	2
MOODY'S VIEW	3
COMPOSITE V SCORE	4
STRENGTHS AND CONCERNS	5
STRUCTURE, LEGAL ASPECTS AND ASSOCIATED RISKS	6
ORIGINATOR PROFILE, SERVICER PROFILE AND OPERATING RISKS	9
COLLATERAL DESCRIPTION	11
CREDIT ANALYSIS	12
BENCHMARK ANALYSIS	15
PARAMETER SENSITIVITIES	17
MONITORING	17
RELATED RESEARCH	19

## Analyst Contacts

Frank Julia-Sala  
Analyst  
44.20.7772.5495  
Frank.Julia-Sala@moodys.com

Alberto Barbachano  
Vice President-Senior Analyst  
34.91.702.6601  
Alberto.Barchano@moodys.com

» contacts continued on the last page

## ADDITIONAL CONTACTS:

Client Services Desks:  
London: 44.20.7772.5454  
clientservices.emea@moodys.com  
Monitoring: Monitor.rmbs@moodys.com  
Website: www.moodys.com

## Definitive Ratings

SERIES	RATING	AMOUNT (MILLION)	% OF [NOTES/ ASSETS]	LEGAL FINAL MATURITY	COUPON	SUBORDINATION*	RESERVE FUND**	TOTAL CREDIT ENHANCEMENT***
A	Aaa	€472.5	54.00	May 2063	3mE +0.3%	46.00%	5.00%	51.00%
B	Caa2	€402.5	46.00	May 2063	3mE +0.7%	0.00%	5.00%	5.00%
Total		€875	100.00					

The ratings address the expected loss posed to investors by the legal final maturity. In Moody's opinion the structure allows for timely payment of interest and ultimate payment of principal at par on or before the rated final legal maturity date. Moody's ratings address only the credit risks associated with the transaction. Other non-credit risks have not been addressed, but may have a significant effect on yield to investors.

\* At close.

\*\* As a % of [total/rated] notes

\*\*\* No benefit attributed to excess spread.

V Score for the sector(Spanish RMBS): *Medium*V Score for the subject transaction: *Medium/High*

The subject transaction is a static cash securitisation of residential mortgage loans extended to obligors located in Spain. The portfolio consists of mortgage loans secured by mainly residential properties in Spain.

## Asset Summary (Cut off date as of 23 July 2010)

Seller(s)/originator(s):	Caja de ahorros de Valencia (Bancaja) (A3/P-2/negative outlook)
Servicer(s):	Bancaja (A3/P-2)
Receivables:	First lien mortgage loans to individuals secured by property located in Spain.
Methodology Used:	» <a href="#">Moody's Updated Methodology for Rating Spanish RMBS, October 2009 (SF133138)</a>

## Asset Summary (Continued)

Methodology Used:	» <a href="#">Cash Flow Analysis in EMEA RMBS: Testing Features with the MARCO Model (Moody's Analyser of Residential Cash Flows), January 2006 (SF58290)</a> » <a href="#">A Framework for Stressing House Prices in RMBS Transactions in EMEA, July 2008 (SF131751)</a> » <a href="#">V Scores and Parameter Sensitivities in the Major EMEA RMBS Subsectors, April 2009 (SF158654)</a> » <a href="#">Moody's Enhanced Approach to Originator Assessments in EMEA RMBS Transactions, October 2009 (SF153718)</a>
Models Used:	MILAN (Spain settings) MARCO & ABSROM
Total Amount:	€875,000,000
Length of Revolving Period:	Static
Number of Borrowers:	5,188
Borrower concentration:	Top 20 borrowers make up 1.42% of the pool
WA Remaining Term:	34.4 years
WA Seasoning:	2.1 years
Interest Basis:	100% floating rate loans indexed to EURIBOR
WA Current LTV:	86.5%
WA Original LTV:	88.7%
Moody's calculated WA indexed LTV:	92.8%
Borrower credit profile:	Mainly prime borrowers. However, 25.0% of loans are refinancing from previously underperforming borrowers.
Delinquency Status:	3.8% loans are up to 30 days in arrears at the cut off date. No loans more than 30 days in arrears at the time of securitisation.

## Liabilities, Credit Enhancement and Liquidity

Excess Spread At Closing:	1.02% WA margin over the reference rate of the loans
Credit Enhancement/Reserves:	Excess spread Subordination of the notes 5.00% non-amortising reserve fund Guaranteed Investment Contract (GIC) account earning three-month EURIBOR on deposits
Form of Liquidity:	Excess spread, principal to pay interest mechanism, non-amortising reserve fund
Number of Interest Payments Covered by Liquidity:	Reserve Fund at initial level will cover 5.1 years of interest payments on the notes, given the current level of three-month Euribor
Interest Payments:	Quarterly in arrears on each payment date
Principal Payments:	Pass-through on each payment date
Payment Dates:	The 23rd day of February, May, August, November First payment date: 23 November 2010
Hedging Arrangements:	None

## Counterparties

Issuer:	MBS Bancaja 7, Fondo de Titulización de Activos
Sellers/Originators:	Bancaja (A3/P-2)
Contractual Servicer(s):	Bancaja (A3/P-2)
Sub-Servicer(s):	N/A
Back-up Servicer(s):	N/A
Back-up Servicer Facilitator:	Europea de Titulización S.G.F.T.; S.A (NR)
Cash Manager:	Europea de Titulización
Back-up Cash Manager:	N/A
Calculation Agent:	Europea de Titulización
Back-up Calculation/Computational Agent:	N/A
Swap Counterparty:	N/A
Issuer Account Bank:	Banco de Sabadell (A2/P-1)
Collection Account Bank:	Bancaja (A3/P-2)
Paying Agent:	Banco Cooperativo Español (A1/P-1)
Management Company:	Europea de Titulización
Issuer Administrator/Corporate Service Provider:	Europea de Titulización
Arranger:	Europea de Titulización

## Moody's View

<b>Outlook for the Sector:</b>	Negative
<b>Unique Feature:</b>	First securitisation by Bancaja of mainly high LTV loans (83.6% over 80% LTV) with 25.0% of loans corresponding to refinancing from previously underperforming borrowers.
<b>Degree of Linkage to Originator:</b>	Bancaja acts as servicer in the transaction. There is no back-up servicing arrangement contemplated in the documentation at closing.
<b>Originator's Securitisation History:</b>	
# of Precedent Transactions in Sector:	20 RMBS deals
% of Book Securitised:	88.9%
Behaviour of Precedent Transactions:	Delinquencies reported on prior transactions of this issuer are higher than the average delinquency reported in the Spain index.
Key Differences between Subject and Precedent Transactions:	First securitisation by Bancaja of mainly high LTV loans
<b>Portfolio Relative Performance:</b>	
Expected Loss/Ranking:	16%/ higher than peer group due to adverse collateral characteristics
MILAN Aaa CE/Ranking:	38%/ higher than peer group due to adverse collateral characteristics
Weighted-Average Aaa Stress Rate For House Prices:	45.77%
<b>Potential Rating Sensitivity:</b>	
Chart Interpretation:	At the time the rating was assigned, the model output indicated that Class A would have achieved a Aaa rating even if the expected loss was as high as 25% assuming a MILAN Aaa CE of 50% and all other factors were constant.
Factors Which Could Lead to a Downgrade:	In addition to the counterparty issues, the following factors may have a significant impact on the subject transaction's ratings: further deterioration in the Spanish macroeconomic environment and the real estate market beyond the stress that was modelled; and potential regulatory changes

TABLE 1\*

### Tranche A

#### MILAN Aaa CE OUTPUT

		38%	42%	46%	50%
<b>MEDIAN EXPECTED LOSS</b>	16%	Aaa*	Aaa (0)	Aaa (0)	Aaa (0)
	19%	Aaa (0)	Aaa (0)	Aaa (0)	Aaa (0)
	22%	Aaa (0)	Aaa (0)	Aaa (0)	Aaa (0)
	25%	Aaa (0)	Aaa (0)	Aaa (0)	Aaa (0)

\* Results under base case assumptions indicated by asterisk '\*'. Change in model-indicated rating (# of notches) is noted in parentheses.

## Composite V Score

BREAKDOWN OF THE V SCORES ASSIGNED TO		SPAIN SECTOR	TRANS- ACTION	REMARKS
Composite Score: Low (L), Low/Medium (L/M), Medium (M), Medium/High (M/H), or High (H) "Low" reflects lowest level of uncertainty in estimating credit risk relative to other Structured Finance instruments.				
<b>1</b>	<b>Sector Historical Data Adequacy and Performance Variability</b>	<b>M</b>	<b>M/H</b>	
1.1	Quality of Historical Data for the Sector	M	M	» Same as sector score
1.2	Sector's Historical Performance Variability	M	M	» Same as sector score
1.3	Sector's Historical Downgrade Rate	L/M	M/H	» High LTV deals have shown worse performance than the market index
<b>2</b>	<b>Issuer/Sponsor/Originator Historical Data Adequacy, Performance Variability and Quality of Disclosure</b>	<b>M</b>	<b>M/H</b>	
2.1	Quality of Historical Data for the Issuer/Sponsor/Originator	M	M/H	» The originator provided historical information on arrears 90 day, recoveries and prepayments from their book. » Moody's also received historical information on arrears 90 day, default and recoveries for the bucket of high LTV loans within the previous Bancaja transactions. » However, there is no historical information on the performance of refinancings of delinquent loans.
2.2	Issuer/Sponsor/Originator's Historical Performance Variability	M	M/H	» Previous deals show worse performance and higher volatility than the market index » Various previous Bancaja deals have been downgraded
2.3	Disclosure of Securitisation Collateral Pool Characteristics	L/M	L/M	» Moody's has received information on all the fields required in Moody's methodology, except for few missing fields in occupancy type. » Moody's has also received information on the borrower previous performance for refinanced loans
2.4	Disclosure of Securitisation Performance	L/M	L/M	» Previous transactions report arrears, defaults and recoveries and generally have a good level of data » No loan level data is received periodically, as with other lenders. » High level of historical repurchases could distort the actual underlying performance.
<b>3</b>	<b>Complexity and Market Value Sensitivity</b>	<b>L/M</b>	<b>M/H</b>	
3.1	Transaction Complexity	L/M	M/H	» High LTV deals are more exposed to house price declines. » Also this pool contains loans with adverse characteristics.
3.2	Analytic Complexity	L/M	L/M	» In line with a typical transaction in the sector. Use of Milan framework and standard cashflow models
3.3	Market Value Sensitivity	L/M	L/M	» In line with a typical transaction in the sector
<b>4</b>	<b>Governance</b>	<b>L/M</b>	<b>L/M</b>	
4.1	Experience of, Arrangements Among and Oversight of Transaction Parties	L/M	L/M	» Extensive experience in securitising mortgage loan pools
4.2	Back-up Servicer Arrangement	L	L	» A3 rated servicer. Back-up servicer to be identified at loss of Baa3.
4.3	Alignment of Interests	L/M	L/M	» In line with a typical transaction in the sector
4.4	Legal, Regulatory, or Other Uncertainty	L/M	L/M	» In line with a typical transaction in the sector

## Strengths and Concerns

### Strengths:

- » **Credit support and liquidity:** Reserve fund fully funded upfront equal to 5% of the notes to cover potential shortfalls in class A interest during the life of the deal and principal and interest at deal maturity.
- » .
- » **Back-up Servicing:** The management company will identify a back-up servicer if Bancaja is downgraded below Baa3. At this stage, the back-up servicer will enter into a back-up servicer arrangement but will only step in at the discretion of the management company.
- » **Artificial write-off mechanism:** Excess spread-trapping mechanism through a 18-month "artificial write-off".

### Concerns and Mitigants:

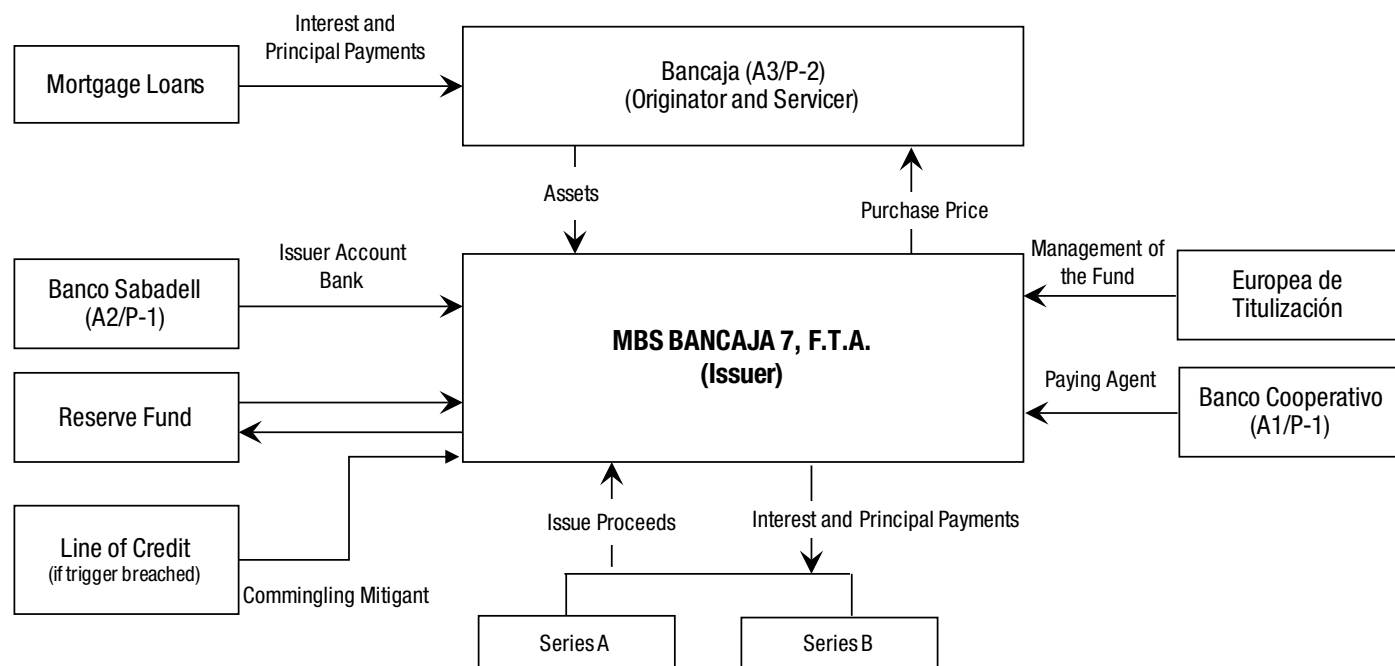
Moody's committees particularly focused on the following factors, listed in order of those most likely to affect the ratings:

- » **High LTV pool:** 83.6% of loans in the pool are above 80% LTV. The weighted-average current LTV (based on valuation at origination) is 86.5%, which is higher than typical Spanish RMBS and in line with other Spanish high LTV transactions. Moody's MILAN framework takes into account the LTV impact on default frequency and severity.
- » **Refinancing:** 25.0% of loans are refinancings from previously underperforming borrowers. Effectively, this bucket represents non prime collateral risk. See section "Treatment of Concerns".
- » **Loans in Arrears:** 3.8% of the pool is in arrears up to 30 days as of cut-off date. The transaction does not allow loans more than 30 days arrears as of closing date. Milan adjustments have been applied.
- » **Principal grace period:** 30.1% of loans have principal grace periods (with 4.8% of the loans having a grace period above 3 years). See section "Treatment of Concerns".
- » **Interest rate risk:** There are no hedging arrangements in the transaction. See section "Assets".
- » **Origination channel:** 23.7% of the pool has been originated through brokers. See section "Treatment of Concerns".
- » **Foreign nationals:** 8.9% of the pool correspond to foreign national borrowers. See section "Treatment of Concerns".
- » **Employment characteristics:** 13.0% of borrowers are self-employed and there is no employment information for 8.3% of the borrowers. Milan penalties have been applied.
- » **Geographical concentration:** The pool shows geographical concentration in the region of Valencia (42.1%). Concentration risk is sized in Moody's MILAN framework.
- » **Economic conditions:** Weak economic prospects in Spain, with rising unemployment likely to drive delinquencies up in the short to medium term, specially for weaker borrowers. This is mitigated by an increased expected loss to account for this risk.

## Structure, Legal Aspects and Associated Risks

CHART 1

### Structure Chart



### Allocation of payments/pre accelerated revenue waterfall

On each quarterly payment date, the issuer's available funds (i.e. interest amounts received from the portfolio, the reserve fund and interest earned on the issuer's account) will be applied in the following simplified order of priority:

1. Cost and fees, excluding servicing fee (except if Bancaja is replaced as servicer of the loans)
2. Interest on Class A
3. Replenishment of the reserve fund (except on deal maturity or liquidation)
4. Principal on Class A

5. Interest on Class B
6. Principal on Class B
7. Subordinated loan and other junior payments

### Allocation of payments/PDL-like mechanism

A principal deficiency ledger (PDL) is defined as the negative difference between the principal available funds and a target principal amount. A target principal amount is the difference between the notes' outstanding principal and the performing assets. A non-performing asset is defined as one with any amount due but unpaid for more than 18 months or one written off.

**Performance Triggers:**

TRIGGER	CONDITIONS	REMEDIES/CURE
None		

**Reserve Fund**

- » At close: 5% of original note balance

The reserve fund does not amortise. Due to its seniority in the priority of payments, the reserve fund will be only used to cover for shortfalls on the payment due for costs and class A interest during the life of the deal. It will be applied to payments of interest and principal at deal maturity or on liquidation.

**Liquidity**

- » Principal to pay interest mechanism.
- » Non-amortising reserve fund.

**Assets:****Asset transfer:**

- » True Sale: According to the legal opinion received, the securitisation of assets will be carried out in compliance with the Spanish Securitisation Law.
- » Bankruptcy Remoteness: Under the Spanish Securitisation Law, a Spanish SPV (FTA/FTH) is not subject to the Spanish Insolvency Law. Only the management company, acting in the best interest of the noteholders, can decide to liquidate the Fondo.

**Interest rate mismatch:**

100% of the portfolio corresponds to floating-rate loans linked to 12-month EURIBOR resetting annually (9.4% reset semi-annually); whereas the three-month EURIBOR on the notes resets quarterly on the determination dates. There is no hedging in the transaction. Consequently, the Fondo will be subject to base rate mismatch risk.

**Mitigant:**

Moody's analysis takes into account the potential interest rate exposure in order to assess the ratings. The analysis is based on the observation of the historical volatility between the two rates in a given time interval defined on the basis of the cash-flow dynamics in the specific transaction. The exposure is then computed applying an historical VAR approach with a 99% confidence interval. In the case of a mismatch between 12-month EURIBOR and three-month EURIBOR, the adjustment to the gross margin on the 12-month EURIBOR-linked loans would currently be in the range of 40 to 70 bps.

In addition, the margin has been stressed to represent the risk of loans renegotiating the margin in the future (see Permitted Variations below).

**Cash Commingling:**

All of the payments under the loans in this pool are collected by the servicer under a direct debit scheme into the originator's account. Consequently, in the event of insolvency of Bancaja and until notification is delivered to the relevant debtors to redirect their payments, payments by the underlying debtors will continue to be collected by the servicer and may commingled with other funds belonging to Bancaja.

**Mitigant:**

- » Collections will be transferred daily to the issuer account.
- » If Bancaja's long-term rating falls below Baa3, it will: (i) find a P-1 rated entity to extend a line of credit; or (ii) deposit a commingling reserve in a P-1 entity. The amounts deposited in the reserve or drawn from the line of credit will be equal to one month of collections (interest and principal). The amounts will be part of the available funds if the servicer does not transfer received collections to the Fondo (draw down amounts will be equal to the amount of collections received and not transferred by Bancaja). In both cases, these amounts will be repaid junior in the waterfall.
- » In the event of insolvency, administration by the Bank of Spain, liquidation or substitution of the servicer, or because the management company deems it reasonable, the management company may demand that the servicer notifies obligors of the portfolio's transfer to the Fondo and advises obligors that payments on their loans will only be effective as a discharge if made into the treasury account in the name of the issuer. The management company also has the ability to carry out the notification.

Commingling risk has been modelled in Moody's analysis, assuming one month of collections as we do not believe that the mitigants proposed fully cover the potential risk.

**Set off:**

100% of obligors have accounts with the seller.

**Mitigant:**

Set off is very limited because only unpaid instalments that are considered as fully due and payable prior to the

declaration of insolvency might be offset against the deposits held by the originator.

**Permitted loan variations:**

Any renegotiation of the terms and conditions of the loans is subject to the management company's approval. The management company may authorise Bancaja to renegotiate without requiring its approval the interest rate or the maturity of loans.

**Mitigant:**

The renegotiation of the maturity of the loans is subject to various conditions:

- » The maturity of any loan cannot be extended beyond November 2059.
- » The global initial amount of loans on which the maturity has been extended cannot be greater than 10% of the initial amount of the pool.
- » The frequency of payments cannot be decreased.
- » The amortisation profile cannot be modified.

Bancaja will be unable to renegotiate the margin of any loan once the weighted-average margin of the portfolio is below 70 bps.



## Originator Profile, Servicer Profile and Operating Risks

Date of Operations Review:

### Originator Background: Bancaja

Rating:	» A3/P-2
Financial Institution Group Outlook for Sector:	» Negative
Ownership Structure:	» N/A
Asset Size:	» €89,605 million
% of Total Book Securitised:	» 16%
Transaction as % of Total Book:	» 0.98%
% of Transaction Retained:	» 100%

ORIGINATOR ASSESSMENT	MAIN STRENGTHS (+) AND CHALLENGES(-)
<b>Overall Assessment:</b>	<b>Average</b>
<b>Originator Ability</b>	
Sales & Marketing Practices	<ul style="list-style-type: none"> <li>+ Most loans are currently originated through the branch network.</li> <li>+ Origination to foreign nationals has been very limited from 2008 and broker origination has also been reduced significantly.</li> <li>+ Overall, Bancaja has been in line with the rest of the market in restricting lending to riskier borrowers since 2008 onwards as a results of the economic downturn.</li> <li>- However, historically very active in the foreign national segment of the market and around 20% of loans were originated via broker. This affects mainly loans originated before 2008.</li> <li>- Limited review of third –parties (brokers).</li> </ul>
Underwriting Policies & Procedures	<ul style="list-style-type: none"> <li>+ Good scoring system updated in 2009 to differentiate risk by borrower residency and EU/non-EU country of origin</li> <li>+ Use of electronic filing through the underwriting process</li> <li>+ Credit history checks in line with Spanish standards. Borrowers are checked thoroughly with all relevant credit bureaus.</li> <li>+ Loan with LTV &gt; 80% usually require additional guarantees</li> <li>+ Income verification is adequate. Last tax return plus the 3 last payslips for employees. VAT billing report for self-employed. For workers in temporary contracts their job history is checked through the government national insurance organisation.</li> <li>+ DTI calculation takes into account the net income in excess of estimated expenses to cover the loan payments. All variable income (e.g. property rent, agricultural, etc.) need to be documented to be taken into account and a haircut applies.</li> <li>- Scoring system has not yet been validated by Bank of Spain</li> <li>- No automatic credit history check on foreign residents</li> <li>- Interest rate is not stressed in the DTI calculation</li> </ul>
Property Valuation Policies & Procedures	<ul style="list-style-type: none"> <li>+ Quality of valuations in Spain is standardised by the Bank of Spain, who certifies valuers or Sociedades de Tasación. All properties get full internal valuation which can be no older than 6 months as of origination.</li> <li>+ No contact between the sales staff at the branch level and the appraisal company.</li> <li>+ Appraisal company is assigned randomly.</li> <li>+ Bancaja actively monitors de valuation companies annually.</li> </ul>
Closing Policies & Procedures	<ul style="list-style-type: none"> <li>+/- In line with Spanish market. Third-party notary performs the checks on property registry and searches.</li> <li>+ Borrower is called in to finalise the sign up and set the transfer to the seller.</li> <li>- No information was given on any other additional closing controls in place</li> </ul>
Credit Risk Management	<ul style="list-style-type: none"> <li>+ A risk department of 33 people is in charge of assessing the performance of the mortgage loan book by characteristics such as product type, area, branch, broker originated or appraisal company.</li> <li>+ Independence of the team.</li> </ul>
<b>Originator Stability</b>	
Quality Control & Audit	<ul style="list-style-type: none"> <li>+ Audit performed by internal team and in line with rest of the market.</li> <li>+ On a monthly basis there is a check and verification of underwriting practices on the branches. Feedback is provided or the process adjusted as required.</li> <li>- Frequency of audit on branches is up to 3 years.</li> </ul>
Management Strength & Staff Quality	<ul style="list-style-type: none"> <li>+ All new hires go through a formalised training program</li> <li>+ Directors and managers have on average long experience in the market.</li> <li>+ Clear definition of responsibilities. For small branches only the director performs origination tasks. In bigger branches normally the director and a sub-director will share responsibilities.</li> <li>+/- Turnover of junior staff in line with rest of the market</li> </ul>
Technology	<ul style="list-style-type: none"> <li>+ Adequate legacy system, back up and contingency plan</li> <li>+ Documents are available electronically</li> </ul>

## Servicer Background: Bancaja

Rating:	» A3/P-2
Total Number of Mortgages Serviced:	» 303,205
Number of Staff:	» Data not provided

SERVICER ASSESSMENT:	MAIN STRENGTHS AND CHALLENGES
Overall Assessment:	Average
<b>Servicer Ability</b>	
Loan Administration	+ In line with Spanish standard. All payments by direct debit from a borrower account held by the lender. + Active alert generation on potential risky borrowers by a monitoring team. Preventive actions are taken to avoid delinquency.
Early Arrears Management	+ Branch contacts borrower. Letters are automatically sent to the borrower and the guarantors. +/- Third party special servicer takes charge from 30 day arrears up to start foreclosure. Compensated based on performance targets. + Automatic work load prioritisation based on roll rate expectation and number of months in arrears. + Renegotiation of delinquent loans can be offered after assessing the borrower's affordability. - No information on the tracking of the promise to pay.
Loss Mitigation and Asset Management	+/- Bancaja works with internal and external lawyers. + There is an estate agent entity owned by Bancaja in charge of the administration and marketing of acquired properties. +/- Historical recovery rates are in line with the market.
<b>Servicer Stability</b>	
Management Strength & Staff Quality	+ Experienced staff - No information on any formalised training for collectors - No information on compensation of internal collectors relative to performance
IT & Reporting	+ There is a central system for management and reporting of servicing activities that is accessible though the firm.
Quality control & Audit	+/- In line with the market. Generally, there is not much information from lenders on whether appropriate servicing controls are in place.

## Back-up Servicer Background: None appointed

<b>Receivable Administration:</b>	
Method of Payment of borrowers in the pool:	100% Direct debit
% of Obligor with Account at Originator:	100%
Distribution of Payment Dates:	Evenly distributed along themonth

## Cash Manager Background: Europea de Titulización

Rating:	NR
Main Responsibilities:	Preparation of investor report Obligation to calculate the payments according to waterfall Draw on reserve fund Request a commingling reserve or line of credit, if applicable
Calculation Timeline:	Calculation date

## Back-up Cash Manager Background: None appointed

## Originator/Servicer/Cash Manager Related Triggers

Key Servicer Termination Events:	Insolvency, Administration by Bank of Spain, Failure to perform under servicing contract
Appointment of Back-up Servicer Upon:	On servicer loss of Baa3
Key Cash Manager Termination Events:	Insolvency
Appointment of Back-up Cash Manager Upon:	N/A
Notification of Obligor of True Sale	On servicer default
Conversion to Daily Sweep (if original sweep is not daily)	Daily sweeping from day one
Notification of Redirection of Payments to SPV's Account	On servicer default
Accumulation of Set Off Reserve	N/A
Accumulation of Liquidity Reserve	N/A
Set up Liquidity Facility	N/A

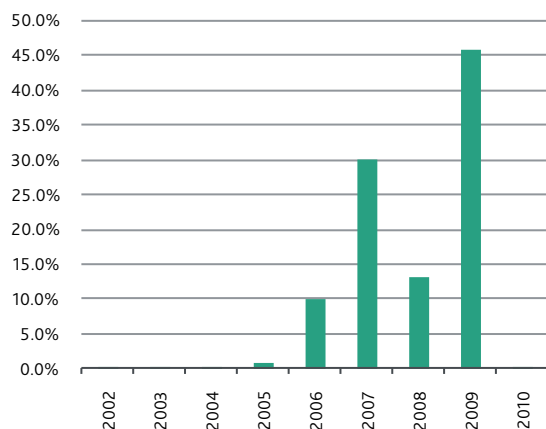
CHART 2

**Entities involved for Cash Management and Servicing**

Cash Management	Loan administration	Early arrears	Late arrears	Asset managt.
Cash manager: Europea de Titulizacion	Back-up; None	Servicer: Bancaja	Back-up; None appointed	Servicer: Bacaja
				Back-up; None appointed
				Servicer: Bancaja
				Back-up; None appointed

**Collateral Description (closing pool as of July 2010)**

CHART 3

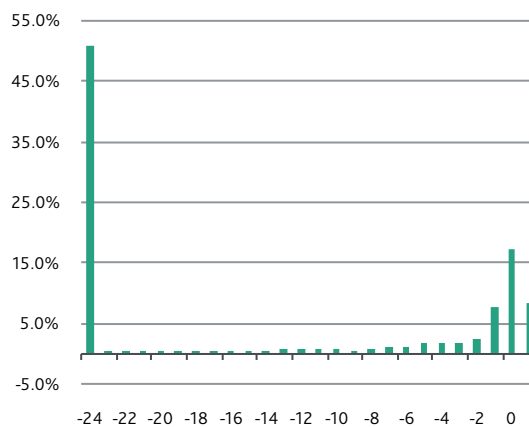
**Portfolio Breakdown by Year of Origination**

Source: Provisional pool

CHART 4

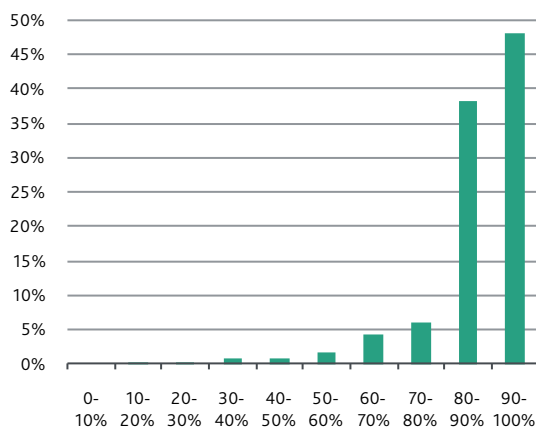
**Portfolio Breakdown by Months Current**

Months current (negative) and arrears (positive)



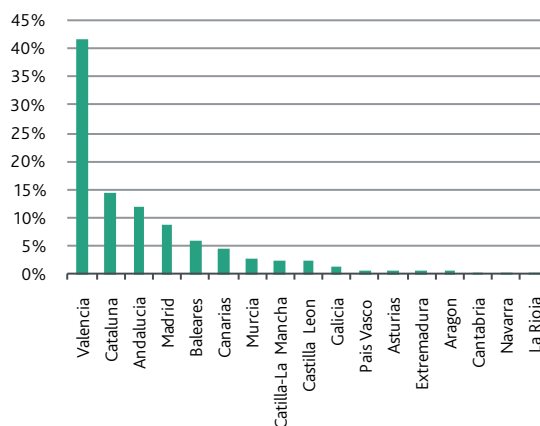
Source: Provisional pool

CHART 5

**Portfolio Breakdown by current LTV**

Source: Provisional pool

CHART 6

**Portfolio Breakdown by Geography**

Source: Provisional pool

**Product Description:** The assets backing the notes are first-ranking mortgage loans originated by Bancaja. 25.0% of loans are refinancing from previously underperforming borrowers. Almost all the loans in the pool are secured on

residential properties located in Spain (4.4% are commercial or land lend to individuals).

**Eligibility Criteria:** The key eligibility criteria are as follows:

- » The final maturity date is not later than November 2059.
- » The mortgage certificates exist and are valid and enforceable.
- » The mortgage certificates are all denominated and payable exclusively in euros.
- » The mortgaged properties are all finished and located in Spain and have been appraised by duly qualified institutions approved by the Bank of Spain.
- » None of the mortgage certificates have any payments more than one month overdue at the transaction closing date.
- » The Originator has strictly adhered to the policies in force for granting credit at the time in granting each and every one of the mortgage certificates.
- » Each mortgage certificate must be registered in the relevant property registry.
- » All borrowers are individuals (no companies)
- » Loans cannot be granted further payment grace periods (only those reported as of deal closing date apply).

## Credit Analysis

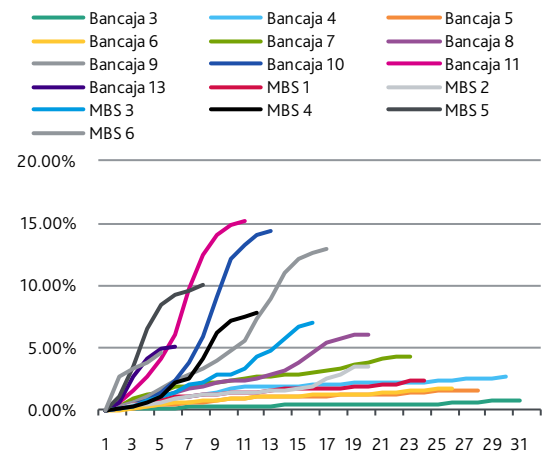
### Precedent Transactions' Performance:

The performance of the originator's previous transactions in this sector are below Moody's expectations and worse than the sector average.

Charts below show the cumulative arrears 90 day, cumulative default by seasoning quarter for the current 19 Bancaja transactions. The recovery rate from arrears 90 day is also indicated.

CHART 7

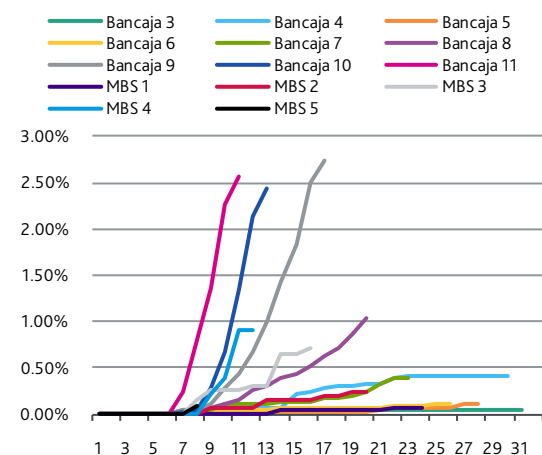
### Cumulative 90 day arrears of High LTV loans in Bancaja transactions



Source: Europea de Titulización

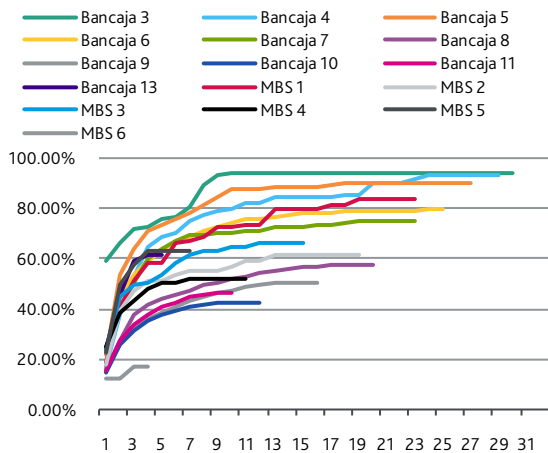
CHART 8

### Cumulative default of High LTV loans in Bancaja transactions



Source: Europea de Titulización

CHART 8

**Recovery of 90 day arrears for high LTV loans in Bancaja transactions**

Source: Europa de Titulización

**Data Quantity and Content:**

Bancaja has provided historical information on delinquencies, prepayments and recoveries with respect to high LTV loans in former securitisation transactions.

In Moody's view, the quantity and quality of data received is adequate compared to transactions which have achieved high investment grade ratings in this sector.

Please see below our treatment of refinanced loans regarding Expected Loss and MILAN Aaa CE

CHART 9

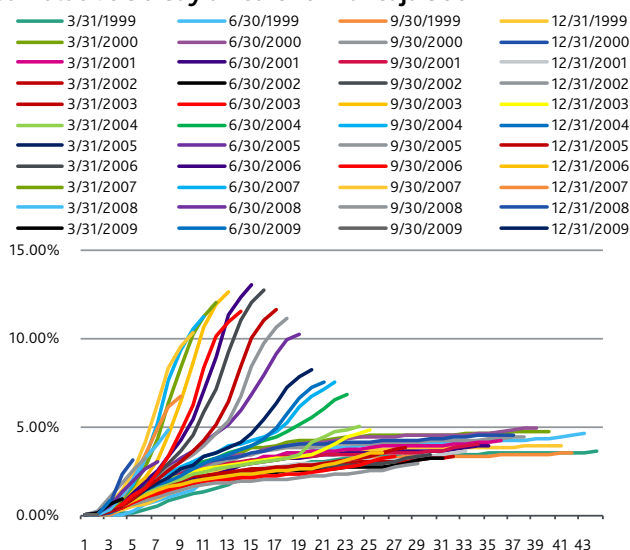
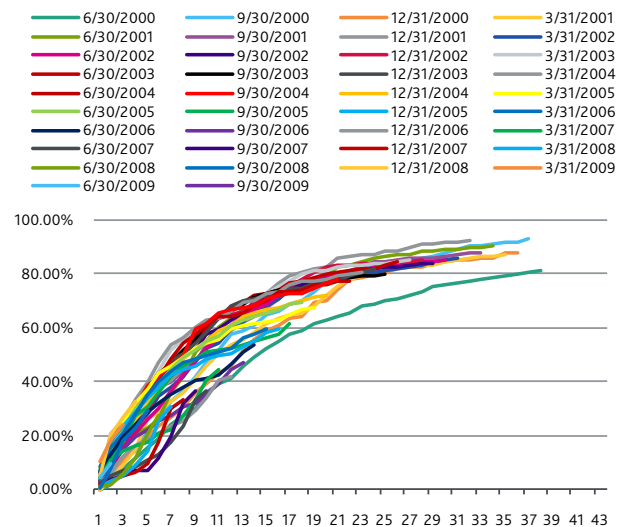
**Cumulative 90 day arrears for Bancaja book**

CHART 10

**Recovery of 90 day arrears for Bancaja book**

Assumptions and definitions Other values within a range of the notional amount listed below may result in achieving the same ratings.

**ASSUMPTIONS**

Spread compression / margin analysis	50% of the assumed CPR comes from repayment of high interest rate loans. The other 50% is from repayment of loans with average interest rates.
Stressed Fees	0.30% p.a.

**DEFINITIONS**

WA asset margin at closing	1.024% p.a.
Asset reset date	N/A
Liabilities reset date	Quarterly
Interest on cash	Three-month Euribor
Actual Fees	Data not provided
PDL Definition	On default
Default Definition	18 month arrears

The spread in the deal will depend on the actual average margin paid from the portfolio. Moody's has applied a margin compression taking into consideration the current margins paid by each mortgage loan, and assuming the effect that prepayments and renegotiations will have on the portfolio margin along the life of the deal. Bancaja is allowed to renegotiate the margin of any loan as long as the weighted-average margin of the portfolio is above 70 bps.

**Expected Loss:**

Expected loss for this transaction was obtained by projecting the historical delinquency trends of high LTV loans originated by Bancaja, and also through benchmarking with previous Bancaja transactions and other peer Spanish RMBS transactions taking into account the differences in the characteristics of the pool.

For the refinanced loans bucket, a 70% default probability was assumed.

### Modelling Approach:

**Loss Distribution:** The first step in the analysis is to determine a loss distribution of the pool of mortgages to be securitised. Due to the large number of loans and supporting historical data, Moody's uses a continuous distribution to approximate the loss distribution: the lognormal distribution.

In order to determine the shape of the curve, two parameters are needed: the expected loss and the volatility around this expected loss. These parameters are derived from two important sources: historical loss data and the loan-by-loan model.

Moody's uses performance data provided by the originator in addition to other relevant data in order to extrapolate expected losses for the loan pool. Examples of data include market and sector wide performance data, the performance of other securitisations, and other originators' data.

To obtain the volatility under "stressed" scenarios, Moody's takes into account historical data. However observed historical volatility may not be significant (given insufficient data points, or incomplete data), and in addition may not be representative for the future as it is based on the previous economic environments experienced.

Consequently, Moody's determines a number representing the enhancement that would be required for a pool of mortgages to obtain a rating consistent with Aaa under highly stressed conditions. This enhancement number (the "MILAN Aaa CE" number) is produced by using a loan-by-loan model, which looks at each loan in the pool individually and based on its individual characteristics such as LTV or other identified drivers of risk, will produce a benchmark CE number. This assumes stressed recovery rates (through house price decline), time to recovery, interest rates and costs to foreclosure. The weighted-average benchmark CE number will then be adjusted according to positive and negative characteristics of each loan or of the pool as a whole to produce the MILAN Aaa CE number.

**Modelling assumption:** The MILAN Aaa CE number and the expected loss number form the basis of Rating Committee discussions and are used to derive the lognormal distribution of the pool losses

The standard deviation of the distribution is found by setting the expected loss of the area of the lognormal distribution beyond the MILAN Aaa CE equal to the expected loss that is consistent with the idealised expected loss of a Aaa tranche.

**Tranching of the Notes:** Once the loss distribution of the pool under consideration has been computed, a cash flow model is used to assess the impact of structural features of the transaction. It calculates the average lives and the losses experienced by the notes for every loss scenario for the portfolio. Based on these numbers, the expected loss and the weighted-average lives for the notes are calculated as weighted averages based on the probabilities of the respective scenarios. The expected loss on each tranche together with the notes' weighted-average life determines the rating, which is consistent with Moody's target losses for each rating category.

The rating of the notes is therefore based on an analysis of:

- » The characteristics of the mortgage pool backing the notes
- » The relative roll-rate levels and arrears in this type of lending compared to conventional lending
- » Sector-wide and originator specific performance data
- » Protection provided by credit enhancement and liquidity support against defaults and arrears in the mortgage pool
- » The roles of the swap and hedging providers
- » The legal and structural integrity of the issue

The final MILAN Aaa CE was obtained by overriding the refinanced loans with an assumption of 100% default in the model. Our underlying assumption is that in a Aaa stress scenario, none of these loans would survive.

---

### Treatment of Concerns:

- » **Refinancings:** 25.0% of the portfolio are refinanced loans previously held by Bancaja . Many of the refinancing occurred during 2008 and 2009. Most of the refinancings were offered to previously delinquent borrowers and the rest to borrowers flagged as high risk on which preventive action was taken to avoid delinquency. Thus, effectively, this reflects a non prime collateral risk. A number of these loans were granted grace periods during the refinancing, raising concerns about payment shock once the period expires. Presumably, the capacity to pay for these borrowers have not improved.

Given all the concerns above and that there is not historical data yet for these adverse characteristics in the Spanish market, Moody's has in its MILAN analysis assumed 100% default rate for the refinanced loans and has given only benefit for the recovery, which has been calculated using the standard MILAN stresses.

- » **Grace Periods:** The high proportion of grace periods in this pool is mainly due to the refinanced loans that introduced this feature, as per above. Standard MILAN adjustments have been applied.
- » **Origination channel:** Loans originated by brokers attract an adjustment of 50%.
- » **Foreign nationals:** A 200% adjustment has been applied to foreign national borrowers .

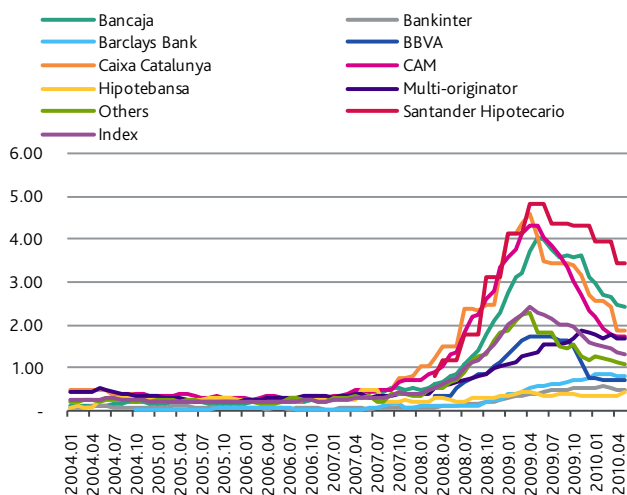
## Benchmark Analysis

Performance Relative to Sector: In Moody's view, the historical performance of 90+ delinquencies of Bancaja transactions is worse than other standard RMBS transactions in this sector (Chart 11), although levels of cumulative default have so far been maintained relatively low compared to delinquencies (Chart 12).

Since this is the first High LTV Bancaja deal, the performance of high LTV loans from Bancaja versus high LTV loans from other originators cannot be directly compared. However, Chart 13 shows that high LTV loans have much higher levels of 90+ delinquencies than the average loan in the market (Chart 13).

CHART 11

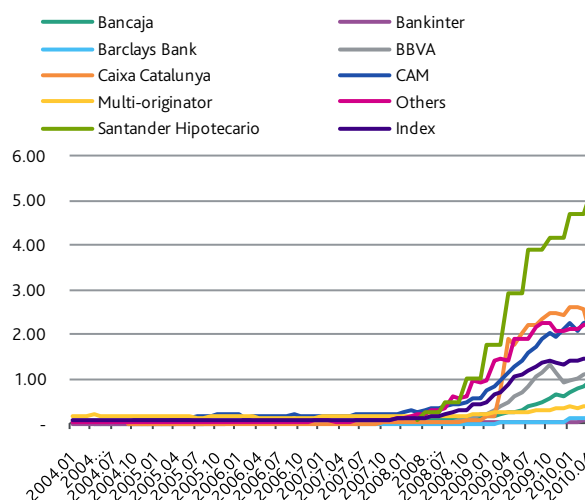
### 90+Delinquencies by originator



Source: Moody's Investors Service, Moody's Performance Data Service

CHART 12

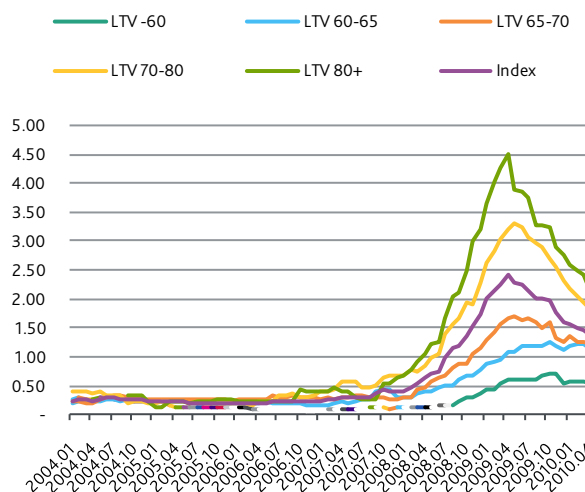
### Cumulative default by originator



Source: Moody's Investors Service, Moody's Performance Data Service

CHART 13

### 90+Delinquencies by LTV



Source: Moody's Investors Service, Moody's Performance Data Service



## Benchmark Table Best practice:

DEAL NAME	MBS BANCAJA 7	HIPOCAT 20	FTA SANTANDER HIPOTECARIO 6	IM BANCO POPULAR MBS 2
Closing date	23 July 2010	01 June 2010	24 May 2010	12 March 2010
Information from	Definitive pool as of 23 July 2009	Preliminary pool	Provisional pool as of 15 February 2009	Definitive pool as of 4 November 2009
Originator	Bancaja	Caixa Catalunya	Banco Santander	Banco Popular
Servicer	Bancaja	Caixa Catalunya	Banco Santander	Banco Popular
MILAN Aaa CE	38.0%	22.9%	30.0%	22.5%
EL	16.0%	7.5%	12.0%	6.0%
<b>PORTFOLIO STRATIFICATION</b>				
Avg. Current LTV	86.5%	68.4%	89.1%	86.8%
% Current LTV > 70%	90.8%	55.8%	99.9%	92.8%
% Current LTV > 80%	83.6%	39.3%	96.8%	60.7%
% Current LTV > 90%	44.8%	19.4%	38.9%	34.0%
Avg. Current LTV indexed*	92.8%	65.4%	90.8%	
% Self Employed	13.0%	16.7%	0.0%	0
% Non-owner Occupied (Includes: Partial Owner)	9.0%	9.6%	2.3%	15.2%
% in Arrears	3.8%		6.7%	2.0%
Max regional concentration	42%	74%	21%	33%
Foreign nationals	8.9%			
Broker originated	23.7%			
<b>PORTFOLIO DATA</b>				
Current Balance	€ 875,009,975	€ 900,000,119	€1,148 million	€ 685,999,999
Average Loan (Borrower)	€ 168,660	€ 103,998	€ 183,800	€ 141,500
Borrower top 20 (as % of pool bal)	1.4%	2.1%	2.1%	2.4%
WA interest rate at cut-off	2.49%	2.78%	2.7%	3.3%
Average seasoning in years	2.1	4.3	2.3	3.03
Average time to maturity in years	34.4	24.3	30.2	27.94
Maximum maturity date	Nov-59	Jun-50	Dec-54	01-Aug-49
Average House Price stress rate***	45.77%	45.60%	45.2%	43.8%
Average House Price change*	-6.74%	6.50%	-1.9%	-0.7%
<b>STRUCTURAL FEATURES</b>				
Notes Payment Frequency	Quarterly	Monthly	Quarterly	Monthly
Total Aaa size	54.00%	71.00%	83.00%	87.00%
RF at Closing§	5.00%	6.10%	20.00%	8.00%
RF Fully Funded at Closing?	Yes	Yes	Yes	Yes
RF Floor§	5.00%	6.10%	10.00%	4.00%
Hedge in place	No	No	Yes	Yes
Swap rate or guaranteed XS (if applicable)	N/A (no swap)	N/A (no swap)	80 bps	65 bps
Principal to pay interest?	Yes	Yes	Yes	Yes

\* As per Moody's calculation.

\*\* Margin after all loans reset. Equals current margin if there is no reset period.

\*\*\* As per Moody's Milan methodology for Aaa scenario

§ Of original note balance



## Parameter Sensitivities

Parameter Sensitivities provide a quantitative, model-indicated calculation of the number of notches that a Moody's-rated structured finance security may vary if certain input parameters used in the initial rating process differed. The analysis assumes that the deal has not aged. It is not intended to measure how the rating of the security might migrate over time, but rather, how the initial rating of the security might differ as certain key parameters vary. For more information on V Score and Parameter sensitivity methodology for RMBS, please refer to "V Scores and Parameter Sensitivities in the Major EMEA RMBS Sectors" published in April 2009.

Parameter sensitivities for this transaction were calculated in the following manner: Moody's assumed 16 loss distributions derived from the combinations of MILAN Aaa Credit Enhancement: 38% (base case), 42% (base x 1.1), 46% (base x 1.2) and 50% (base x 1.3) and expected loss: 16% (base case), 19% (base x 1.2), 22% (base x 1.4) and 25% (base x 1.6). The 38% /16% scenario would represent the base case assumptions used in the initial rating process.

The tables below show the parameter sensitivities for this transaction with respect to all Moody's rated tranches.

TABLE 2\*

### Tranche A

		MILAN Aaa CE OUTPUT			
		38%	42%	46%	50%
MEDIAN EXPECTED LOSS	16%	Aaa*	Aaa (0)	Aaa (0)	Aaa (0)
	19%	Aaa (0)	Aaa (0)	Aaa (0)	Aaa (0)
	22%	Aaa (0)	Aaa (0)	Aaa (0)	Aaa (0)
	25%	Aaa (0)	Aaa (0)	Aaa (0)	Aaa (0)

TABLE 3\*

### Tranche B

		MILAN Aaa CE OUTPUT			
		38%	42%	46%	50%
MEDIAN EXPECTED LOSS	16%	Caa2*	Caa2 (0)	Caa2 (0)	Caa2 (0)
	19%	Caa3 (1)	Caa3 (1)	Caa3 (1)	Caa3 (1)
	22%	Ca (2)	Ca (2)	Ca (2)	Ca (2)
	25%	Ca (2)	Ca (2)	Ca (2)	Ca (2)

\* Results under base case assumptions indicated by asterisk '\*'. Change in model-indicated rating (# of notches) is noted in parentheses.

**Worse case scenarios:** At the time the rating was assigned, the model output indicated that Class A would have achieved the Aaa rating even if expected loss was as high as 25.0% assuming MILAN Aaa CE remained at 38.0% and all other factors remained the same. The model output further indicated that the Class A would not have been assigned a Aaa rating with MILAN Aaa CE of 50.0%, and expected loss of 16.0%.

## Monitoring

Moody's will monitor the transaction on an ongoing basis to ensure that it continues to perform in the manner expected, including checking all supporting ratings and reviewing periodic servicing reports. Any subsequent changes in the rating will be publicly announced and disseminated through Moody's Client Service Desk.

**Originator Linkage:** The originator will act as servicer, swap counterparty, issuer account bank and paying agent. There are triggers in place related to the replacement for all the functions above.

**Significant Influences:** In addition to the counterparty issues noted, the following factors may have a significant impact on the subject transaction's ratings:

- » Further deterioration in the real estate market beyond the recovery lag and stress which was modelled.
- » Higher than expected increase in unemployment rates
- » A reversion to a high interest rate environment, that would put further pressure to borrower affordability

### COUNTERPARTY RATING TRIGGERS

COUNTERPARTY RATING TRIGGERS	CONDITION	REMEDIES
Interest Rate Swap Counterparty	In accordance with Moody's swap guidelines*	
Issuer Account Bank	Loss of P-1	Replace or obtain guarantor
Collection Account Bank	Loss of P-1 Loss of Baa3	Daily sweeping Commingling reserve or credit line will be established
Paying Agent	Loss of P-1	Replace or obtain guarantor
Servicer	Loss of Baa3	Appointment of back-up servicer

\* See Framework for De-Linking Hedge Counterparty Risks from Global Structured Finance Transactions Moody's Methodology, May 15 2006.

### Loan repurchase following breach of representations & warranties (R&W):

- » No check on default

### Monitoring Report:

#### Data Quality:

- » Investor report format finalised and discussed with Moody's analyst.
- » The report includes all necessary information for Moody's to monitor the transaction.
- » Undertaking to periodically provide Moody's with updated pool cut.

- » Loan conversions are not reported in the investor reports.

*Data Availability:*

- » Report provided by: Europea de Titulización S.G.F.T
- » The timeline for investor report is provided in the transaction documentation. The frequency of the publication is monthly.
- » Investor reports are publicly available on the management company website.
- » As of today there is no commitment by the management company to periodically provide Moody's with an updated pool cut.
- » In addition, Moody's will receive on each investor payment date information on the evolution of the sub-pool of refinanced loans, regarding current principal balance and delinquencies.

## Related Research

For a more detailed explanation of Moody's approach to this type of transaction as well as similar transactions please refer to the following reports:

Methodologies Used: pls remove below as needed.

- » [Moody's Approach to Rating UK RMBS, April 2005 \(SF47735\)](#)
- » [Moody's Updated Methodology for Rating UK RMBS, Sept 2009 \(SF112854\)](#)
- » [Moody's Approach to Rating Dutch RMBS, December 2004 \(SF37202\)](#)
- » [Moody's Updated MILAN Methodology for Rating Dutch RMBS, September 2009 \(SF125100\)](#)
- » [Moody's Approach to Rating Italian RMBS, December 2004 \(SF37242\)](#)
- » [Moody's Approach to Rating Portuguese RMBS, October 2004 \(SF45081\)](#)
- » [Moody's Approach to Rating French RMBS, October 2005 \(SF62372\)](#)
- » [Moody's Updated Methodology for Rating Spanish RMBS, October 2009 \(SF133138\)](#)
- » [Moody's Updated Methodology for Rating Spanish Government Sponsored Housing \(VPO\), September 2009 \(SF151453\)](#)
- » [Moody's Updated MILAN Methodology for Rating German RMBS, September 2009 \(SF154503\)](#)
- » [Moody's MILAN Methodology for Rating Irish RMBS, April 2009 \(SF132670\)](#)
- » [Moody's Approach to Rating South African RMBS, January 2005 \(SF34788\)](#)
- » [Moody's Methodology for Rating Greek RMBS, October 2009 \(SF139562\)](#)
- » [Moody's Approach to Rating Belgian RMBS, September 2006 \(SF79604\)](#)
- » [Moody's Approach to Rating Swiss RMBS, December 2004 \(SF39456\)](#)
- » [Moody's Updated Approach to NHG Mortgages in Rating Dutch RMBS, March 2009 \(SF157265\)](#)
- » [Moody's Updated Methodology for Set-Off in Dutch RMBS, November 2009 \(SF179373\)](#)
- » [Moody's RMBS Master Trust Cash Flow Analysis, April 2008 \(SF130296\)](#)
- » [Cash Flow Analysis in EMEA RMBS: Testing Features with the MARCO Model \(Moody's Analyser of Residential Cash Flows\), January 2006 \(SF58290\)](#)
- » [Cash Flow Analysis of Synthetic ABS/RMBS Transactions, September 2009 \(SF143743\)](#)
- » [Interest Rate Risk in UK RMBS – Moody's Approach, October 2007 \(SF110489\)](#)
- » [Moody's Approach to Automated Valuation Models in Rating UK RMBS, August 2008 \(SF121128\)](#)
- » [A Framework for Stressing House Prices in RMBS Transactions in EMEA, July 2008 \(SF131751\)](#)
- » [V Scores and Parameter Sensitivities in the Major EMEA RMBS Subsectors, April 2009 \(SF158654\)](#)

Originator Profile:

- » [Bancaja](#)

Credit Opinion:

- » [Bancaja](#)

Performance Overviews of previous deals from the same originator:

- » [MBS Bancaja 6, June 2010](#)
- » [Bancaja 13, June 2010](#)

Special Reports:

- » [Investor/Servicer Reports: Important Considerations for Moody's Surveillance of EMEA ABS and RMBS Transactions, June 2009 \(SF154502\)](#)
- » [Recovery Trends in Spanish RMBS, March 2010 \(SF190107\)](#)
- » [Structural Features in the Spanish RMBS Market Artificial Write-Off Mechanisms: Trapping the Spread, January 2004 \(SF29881\)](#)

Index Report:

- » [Spanish Prime RMBS Indices, April 2010](#)

To access any of these reports, click on the entry above. Note that these references are current as of the date of publication of this report and that more recent reports may be available. All research may not be available to all clients.

» contacts continued from page 1

**Analyst Contacts:**

Neal Shah  
*Team Managing Director*  
 44.20.7772.5440  
 Neal.Shah@moody's.com

**ADDITIONAL CONTACTS:**

Frankfurt: 49.69.2222.7847  
 London: 44.20.7772.5454  
 Madrid: 34.91.414.3161  
 Milan: 39.023.6006.333  
 Paris: 33.1.7070.2229

Report Number: SF209439

© 2010 Moody's Investors Service, Inc. and/or its licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ARE MOODY'S INVESTORS SERVICE, INC.'S ("MIS") CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. MIS DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL, FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. CREDIT RATINGS DO NOT CONSTITUTE INVESTMENT OR FINANCIAL ADVICE, AND CREDIT RATINGS ARE NOT RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. CREDIT RATINGS DO NOT COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MIS ISSUES ITS CREDIT RATINGS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT. All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. Under no circumstances shall MOODY'S have any liability to any person or entity for (a) any loss or damage in whole or in part caused by, resulting from, or relating to, any error (negligent or otherwise) or other circumstance or contingency within or outside the control of MOODY'S or any of its directors, officers, employees or agents in connection with the procurement, collection, compilation, analysis, interpretation, communication, publication or delivery of any such information, or (b) any direct, indirect, special, consequential, compensatory or incidental damages whatsoever (including without limitation, lost profits), even if MOODY'S is advised in advance of the possibility of such damages, resulting from the use of or inability to use, any such information. The ratings, financial reporting analysis, projections, and other observations, if any, constituting part of the information contained herein are, and must be construed solely as, statements of opinion and not statements of fact or recommendations to purchase, sell or hold any securities. Each user of the information contained herein must make its own study and evaluation of each security it may consider purchasing, holding or selling. NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

MIS, a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MIS have, prior to assignment of any rating, agreed to pay to MIS for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at [www.moody's.com](http://www.moody's.com) under the heading "Shareholder Relations – Corporate Governance – Director and Shareholder Affiliation Policy."

Any publication into Australia of this Document is by Moody's affiliate Moody's Investors Service Pty Limited ABN 61 003 399 657, which holds Australian Financial Services License no. 336969. This document is intended to be provided only to wholesale clients (within the meaning of section 761G of the Corporations Act 2001). By continuing to access this Document from within Australia, you represent to Moody's and its affiliates that you are, or are accessing the Document as a representative of, a wholesale client and that neither you nor the entity you represent will directly or indirectly disseminate this Document or its contents to retail clients (within the meaning of section 761G of the Corporations Act 2001).