

7th September 2022

FBF RESPONSE
TO THE
EBA CONSULTATION PAPER
ON
NPL TRANSACTIONS DATA TEMPLATES

Ref.: EBA/CP/2022/05

The French Banking Federation (FBF) represents the interests of the banking industry in France. Its membership is composed of all credit institutions authorised as banks and doing business in France, i.e. more than 390 commercial, cooperative and mutual banks. FBF member banks have more than 38,000 permanent branches in France. They employ 370,000 people in France and around the world, and service 48 million customers.

The FBF welcomes the opportunity to respond to this Consultation. For the record, the EBA Consultation Paper deals with the Draft Implementing Technical Standards specifying the templates to be used by credit institutions for the provision of information referred to in Article 15(1) of Directive (EU) 2021/2167 in order to provide detailed information on their credit exposures in the banking book to credit purchasers for the analysis, financial due diligence and valuation of a creditor's rights under a non-performing credit agreement, or the non-performing credit agreement itself (NPL Transactions Data Templates).

1. Do the respondents agree that these draft ITS fits for the purpose of the underlying directive?

The global answer is “no” based on the described objective.

We acknowledge efforts made to streamline the templates compared to their initial 2017 version and thank the EBA for the several roundtables, hearings and consultations aiming to get a better understanding of industry’s viewpoints, needs and constraints. This kind of exchanges is also a good opportunity for us to understand EBA’s thinking, objectives and constraints (including legal mandate, overarching policy objectives) when designing the templates.

We thus welcome this consultation as an opportunity to provide new elements of context that will hopefully lead to targeted changes which can have a positive impact on NPL sales.

The key point we would like to make is that we are not asking for a reduction of mandatory data fields just as a way to minimize disclosure requirements: we are trying to achieve the best possible balance between templates standardization and NPL sales efficiency, bearing in mind that the ultimate objective, shared by the EBA, investors and sellers, is to make NPL disposals easier, with a reduced bid-ask spread.

Please find below elements of context that are essential to understand current NPL sales and that could usefully serve as a basis for modification of the NPL transactions templates.

- 1) First of all, we are already regular sellers, and we intend to even increase NPL disposals in the future. As such, we are strongly convinced that quality of information is key in order to sell in good conditions and to get good price. This is why we are truly interested in improving the NPL transaction templates under discussion, which means, providing the right information under the right format.
- 2) Second, depending on the practices used in different Countries, we may use two sets/templates in our NPL sales. The first one contains the information necessary to price the NPL portfolios. The second one is provided to the buyer before closing, and contains more information, notably data protected by the GDPR and necessary to the good management of sold NPLs. As currently drafted, the EBA NPL transaction templates mix the two types of templates, with information useful for valuation + personal information (+ regulatory & accounting information). In our view, the EBA NPL transaction templates, as their name indicates, should only contain information necessary to price correctly NPLs.
- 3) Third, all the information we have on NPLs is not provided under the same format. Schematically, there are three categories of information:
 - “Core data fields” (~[40-50]TBC, depending of the type of NPLs) are typically available in a standardized way and are key inputs for NPL valuation. Thus, they can be considered as mandatory in the transaction templates.

- The format of the remaining information varies, typically according to the type (segment) of NPL, to EU Member States specificities, etc. This information can be provided in nearly all sales, but under various formats, and should not be required to be produced under one standard format in the transaction templates.
- In addition, sellers can work on “enriched data” i.e. we can produce additional information tailored to a buyer’s needs, if the sales process is sufficiently advanced and if we believe this could create additional value. Producing such information requires significant resources. This information, typically, cannot be provided for each NPL / NPL portfolio. Those enriched data can be very specific to one project. They may add valuable information for one transaction but may be irrelevant (and not available) for another kind of debt.

“Forcing” data fields into pre-defined, standard labels would be counterproductive: the content of the information would not exactly meet the label, and adapting banks’ IT systems to transform the data and make it fit the existing label would be unduly costly. Overall, the impact on NPL sales would be negative.

It would also, in our view, unduly transfer the “burden of proof” from buyers to sellers. While today, potential buyers analyze the data based on the definitions and explanations provided by the sellers, once the ITS enters into force, the responsibility to interpret ITS definitions will be on sellers, who will have to match the information they have with data fields that are almost similar but may not match exactly.

This is the reason why we have until now advocated for a reduction of mandatory fields. This does not mean we want to limit the information we would provide to sellers: in any case, we will provide all the relevant information we have on NPLs in order to get the best possible price, even in different ways than a Data Tape (for example, Q&A process on portfolios with limited number of files but higher individual exposure such as Corporate/ Large Corporate counterparts). However, we cannot provide all this information in a standard format. This is why, following the very useful conversation we had during the Public Hearing, we suggest the following two solutions:

- Solution 1 would be to reduce the number of mandatory fields to the “core data fields” (~40-50) identified via industry’s feedback on this consultation. Other information could be provided separately, under no pre-defined format/label.
- Solution 2 would be to keep the templates as is but to allow the use of “N/D” options: if we have the information under the format specified in the NPL template, we will provide it; if we have it but under a different format, we will provide it separately. At the very least, sellers should be allowed to use “N/D” and explain why they do so, beyond the very restrictive possibilities detailed in the draft ITS.

Additional remarks on the specific subject of mandatory fields and NDs:

- *To illustrate which data fields are necessary in our opinion, we have added one column to the Glossary Excel file provided for the consultation (see last column): this was meant to highlight which fields have to be removed, could be removed, or would raise issues. We have thus sorted the proposed data fields between*

“core data”, “optional fields” and “fields to remove”, to give EBA insight on FBF members’ view on the relevance of each data field.

It is worth noting that, as the discussions progressed, it became clearer and clearer that the assessment was highly correlated to the type of loan, asset class, loan features (secured/unsecured), etc. Hence the difficulty to land on a single template (as mentioned above), and also the importance of preserving optionality / allowing not to fulfill certain data fields in the template.

In this vein, it is paramount that, should the fields indicated as “to be removed” be finally kept, they definitely remain optional; otherwise, additional high hurdles would be put on the path of the selling of NPLs.

- *There is no reason to block the sales of NPLs if the requested mandatory information are not fully (or easily) available at bank’s level as the bidders may take some assumptions / proxies on its sides (which, all other things being equal, will negatively impact the price). As mentioned by several parties during the public hearing, a large number of NPL sale transactions are done in Europe with datape having less than 20 information. For this reason, ESMA shall authorize banks/credit institutions having a minimum mandatory information (well below the 95/135 minimum fields indicated in the last draft of the transaction) to sell its portfolio of NPLs to prospective buyers in order to develop the secondary markets for NPLs in the EU even if they don't have the full mandatory information. As we can imagine, the price proposed by the buyers, as adjustment variable, will be negatively affected and so will, in a medium term, encourage all banks/credit institutions to improve over the time the quality / availability of their datape (in particular by providing the optional information). For instance: FINREP information requested in the NPL data tape may rise difficulties for banks as the reporting system will not be same or because these FINREP information are not easily available on a loan-by-loan basis.*

In addition, we have the following comments:

- We reiterate that we are not in favor of a data hub, mentioned in the comments.
- It is suggested the cut-off date should be as close as possible from closing. For complex transactions, we believe that keeping a fixed cut-off date may be useful to secure the execution of the sale since it allows everybody to align on the same situation. Later updates can lead to new bargain based on the changes in the portfolio + additional work to update all valuations. We believe the cut-off date should be as close as the start of the tender (in line with the current market practice).
- A reasonable delay should be granted between the adoption of the ITS and the entry into force. We cannot adapt as long as the final details of the ITS are known, and adapting banks’ IT systems takes time.

2. What are the respondents’ views on the content of Template 1? Please provide any specific comment you may have on the data fields in the dedicated columns of the data glossary (Annex II to the draft ITS) added for your feedback.

Please refer to the Excel file for specific comments on the data fields.

3. What are the respondents' views on the content of Template 3? Please provide any specific comment you may have on the data fields in the dedicated columns of the data glossary (Annex II to the draft ITS) added for your feedback.

Please refer to the Excel file for specific comments on the data fields.

More specifically on the data field "Total Balance" (3,13): this field seems to represent on balance exposure and therefore have the same meaning of Outstanding Nominal Amount (3,12), defined as the total outstanding net of write off, which for business opportunity we are not fine to share. On the other side, if we understood correctly, it seems we are missing the key data for every Investor, which is the Total GBV, or "Face Value"– which includes on-balance and off-balance exposure, before any write-off and represents the amount that can be claimed to the borrower. If by Total Balance we mean Total GBV, we are fine with this information to be included, but based on our understanding it seems it is not the case.

4. What are the respondents' views on the content of Template 4? Please provide any specific comment you may have on the data fields in the dedicated columns of the data glossary (Annex II to the draft ITS) added for your feedback.

Please refer to the Excel file for specific comments on the data fields.

5. What are the respondents' views on the content of Template 5? Please provide any specific comment you may have on the data fields in the dedicated columns of the data glossary (Annex II to the draft ITS) added for your feedback.?

Please refer to the Excel file for specific comments on the data fields.

6. Do the respondents agree on the structure of Template 2 to represent the relationship across the templates? If not, do you have any other suggestion of structure?

We have no objection to the structure of template 2.

7. Do the respondents agree on the structure and the content of the data glossary? Please provide any specific comment you may have on the data fields in the dedicated columns of the data glossary (Annex II to the draft ITS) added for your feedback.

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8. What are the respondents' views on the content of instructions?

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9. Do the respondents agree on the use of the ‘No data options’ as set out in the instructions?

We believe that current instructions are OK if the number of mandatory fields is reduced to the “core data fields” (~40-50) identified via industry’s feedback on this consultation. Other information could be provided separately, under no pre-defined format/label.

If the number of mandatory fields is left unchanged, however, we should be allowed to use an “N/A” option meaning “(similar) data collected in a different format”. If we have the information under the format specified in the NPL template, we will provide it; if we have it but under a different format, we will provide it separately.

As already mentioned, the sole use of ND4 for the mandatory fields would be a severe issue for banks/credit institutions leading to slow down significantly or stop any future NPL sales for a certain period of time (at least the time for IT developments).

We understand, from the definition of “ND2”, that the EBA implies that all data come from banks’ reporting systems. What is the definition of reporting system? Many data actually come from operational systems (=business systems), e.g. all data extracted during the month as opposed to some reporting system that only provides a picture at month-end. We would like to draw EBA’s attention on the fact that all mandatory reporting information is not available at any time during the month, but most often, at month-end, although NPL sales do not all occur at the end of month.

10. What are respondents’ views on whether the proposed set of templates, data glossary and instructions are enough to achieve the data standardisation in the NPL transactions on secondary markets, or there may be a need for some further technical specifications or tools to support digital processing or efficient processing or use of technology (e.g., by means of the EBA Data Point Model or XBRL taxonomy)?

In order to be consistent with our previous comments, we believe that NPL sales cover extremely diverse situations due to market, debtors, size, products, country, legal environment, etc. Therefore, the idea to get a standard template that would embrace all situations does not seem reasonable. We will always have specific information on a specific portfolio that will not be replicable for all transactions. It would be time consuming to check for each transaction a never-ending list of potential criteria coming from a universal and conceptual model. Hence our pragmatic recommendation to have mandatory “core” data fields and another set of important data that can be reported with more freedom as regards their format.

11. What are the respondents' views on the approach to the proportionality, including differentiating mandatory data fields around the threshold? Please provide any specific comment you may have on the data fields in the dedicated columns of the data glossary (Annex II to the draft ITS) added for your feedback.

Our key recommendation on proportionality is that the final ITS adopt a “portfolio view”. This is because we usually do not sell single NPLs but rather portfolios of several (sometimes thousands) of NPLs. As currently worded, the ITS would put sellers in very difficult situations.

For instance: if we sell a portfolio made up of 80% of “old” NPL (not in scope of the ITS), does it mean we would have to provide: “extended” EBA templates for recent NPLs above the €25,000 threshold, “reduced” EBA templates for recent NPLs under the threshold, and another format for other NPLs? This seems very complicated and inconvenient.

Another example would be a portfolio largely made up of NPL below €25,000€ (which is typically the case in consumer finance): it would not make much sense to impose the use of NPL transaction templates if only a few NPLs exceed the threshold.

This is why, in our view, it would be reasonable (and consistent with real-life practices) to set a threshold at portfolio level where the template would be the same for all files even if some of them exceed the threshold. A reasonable “portfolio threshold” could be 20% of portfolio face value. This means that (i) we should be allowed not to use the transaction templates if the percentage of “in scope” NPLs is below 20% and (ii) we should be allowed to use the “reduced” transaction templates if the share of NPLs above the materiality threshold is below 20%.

We also have a remark on existing forward Flow agreements, where a buyer and a purchaser enter in an agreement where the data to be delivered, the price and the obligation to sell and buy have already been defined in a contract. For the avoidance of doubt, the ITS should not apply to the continuation of existing deals and would only make sense in the perspective of new deals.

12. Do the respondents agree with the proposed calibration of 25 000 euros threshold in line with AnaCredit Regulation? If not, what alternative threshold should be introduced, and why?

Once again, we believe that the proposed threshold should be considered at portfolio level. For a portfolio largely made up of NPL below €25,000€ (which is typically the case in consumer finance): it would not make much sense to impose the use of the extended NPL transaction templates if only a few NPLs exceed the threshold.

Should this pragmatic approach (adapted to market practices and to economic reality) be disregarded, which we would highly regret, then we would propose a threshold of €100,000 / €75,000 to avoid an unnecessary and costly burden bringing very little value added.

13. What are the respondents' views on the operational procedures, confidentiality and data governance requirements set out in the draft ITS?

We disagree with paragraph #17 and with the part of the proposed ITS relating to this paragraph: “the draft ITS requires credit institutions to establish internal process ensuring that the information being provided to the prospective buyers have been validated by staff independent from the staff involved in the sales process, and is subject to an appropriate managerial approval.”

It indeed raises suspicion against data production. We remind that sellers have the contractual obligation to provide accurate data. In addition, data accuracy and quality are essential in building our reputation as a seller. There is thus no need to impose a specific and formal process. Importantly also, this process would entail rigidity that could delay time-to-market.

Index	Template	Data field	Borrower type	Loan type	Description	Loans <= 25000	Loans > 25000	Field type	Static / Dynamic	ESMA (RTS 2020/1224)	EMIT (Annex 1)	FINREP (ITS 2013/451)	CRR	IAS/IFRS	TO RESPONDENTS: Do you agree on the proposed data fields? Please select one of the following options: 'Agree'; 'Remove'; 'Change'	TO RESPONDENTS: Narrative comments on data fields	Classification between: "core data", "optional data" and "remove".
1.00	Counterparty	Counterparty Group Identifier	Applicable to all	Applicable to all	Institution's internal identifier to uniquely identify each counterparty group. Where counterparty group is defined as a group of related counterparties. Where a group could just be a standalone counterparty or multiple counterparties. Each counterparty group should have one Counterparty Group Identifier.	Mandatory	Mandatory	Alphanumeric	Static						Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
1.01	Counterparty	Name of Counterparty Group	Applicable to all	Applicable to all	Name used to refer to the counterparty group.	Mandatory	Mandatory	Alphanumeric	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.02	Counterparty	Economic activity of Counterparty Group	Corporate	Applicable to all	Classification of the counterparty group according to their economic activities, in accordance with the NACE revision 2 statistical classification as laid down in Regulation (EC) No 1893/2006.	Non-mandatory	Non-mandatory	Choice populated by using the classification NACE codes-a level two, three or four NACE code in accordance with Regulation (EC) No 1893/2006.	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.03	Counterparty	Counterparty Identifier	Applicable to all	Applicable to all	Institution's internal identifier to uniquely identify each counterparty. Each counterparty must have one counterparty identifier. This value will not change over time and cannot be used as the counterparty identifier for any other counterparty.	Mandatory	Mandatory	Alphanumeric	Static	2.2.3 12.4.1					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
1.04	Counterparty	Name of Counterparty	Applicable to all	Applicable to all	Full legal name of the counterparty.	Mandatory	Mandatory	Alphanumeric	Static	12.1					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates. Due to Privacy concerns, this information may not be disclosed at the stage of the Offer for private individuals. This is why sellers should be allowed to use a "N/D" option, explaining why the information is not available.	core data set
1.05	Counterparty	Legal Type of Counterparty	Applicable to all	Applicable to all	Type of the counterparty that determines the legal status ("Private Individual", "Listed Corporate", "Unlisted Corporate and Partnership").	Mandatory	Mandatory	Choice: (a) Private Individual; (b) Listed Corporate; (c) Unlisted Corporate and Partnership.	Static						Change	This data field requires an answer which has to be provided into specific pre-defined categories: we are fine to provide the information (which in most cases we are already providing) but would ask to have more freedom as the reconciliation between the 'internal category' of the Bank and the category proposed by EBA would generate additional relevant effort without any real added value for the investor.	optional
1.06	Counterparty	Related Party	Applicable to all	Applicable to all	Indicator as to whether the counterparty is a related party to the institution. Where 'Related Party' is defined by IAS 24 such as a person or entity that is preparing its financial statements or if the Counterparty is an employee of the Institution.	Non-mandatory	Mandatory	Boolean (Yes or No).	Static				IAS 24.9		Change	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
1.07	Counterparty	Date of birth	Private Individual	Applicable to all	Date of birth of the private individual counterparty.	Non-mandatory	Mandatory	dd/mm/yyyy	Static						Change	We believe that this information is valuable but we believe the key point is not the date, but rather the age of the counterparty. We recommend amending the format of this data field into "age" (number of years).	core data set
1.08	Counterparty	Nationality of Counterparty	Private Individual	Applicable to all	The main nationality of the private individual counterparty.	Mandatory	Mandatory	Choice populated using ISO 20022	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.09	Counterparty	Postal code of Counterparty (private individual)	Private Individual	Applicable to all	Counterparty's postal code.	Non-mandatory	Mandatory	Alphanumeric	Dynamic	12.4.10					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
1.10	Counterparty	Country of Counterparty (private individual)	Private Individual	Applicable to all	Counterparty's country.	Mandatory	Mandatory	Choice populated by using ISO 3166-1 alpha-2 code of the country.	Dynamic	12.4.12					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.11	Counterparty	National Identifier	Corporate	Applicable to all	A commonly used identification code which enables the unambiguous identification of the counterparty within its country of residency.	Non-mandatory	Mandatory	Alphanumeric	Static						Change	We agree that this information is valuable and could be considered as one of the -50 "core data fields". However, it does not exist in some jurisdictions, like France, for private individuals. In any way, it is subject to data protection in each jurisdiction (compatibility with GDPR to be confirmed). This is why sellers should be allowed to use a "N/D" option, explaining why the information is not available.	core data set
1.12	Counterparty	Source of National Identifier	Corporate	Applicable to all	Name of the country specific registration office which provides the company national identifier.	Non-mandatory	Mandatory	Alphanumeric	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.13	Counterparty	Counterparty deceased	Private Individual	Applicable to all	Indication as to whether the private individual counterparty has passed away.	Mandatory	Mandatory	Boolean (Yes or No).	Static	Annex X, NP, EL9					Agree	We agree with this data field.	core data set
1.14	Counterparty	Legal Entity Identifier (LEI)	Corporate	Applicable to all	A legal entity identifier of the counterparty assigned in accordance with the International Organisation for Standardisation.	Non-mandatory	Mandatory	Choice populated by using ISO 17442.	Static	12.4.2					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.15	Counterparty	Address of Counterparty	Corporate	Applicable to all	Counterparty's street address, including the street number.	Non-mandatory	Non-mandatory	Alphanumeric	Dynamic	12.4.8					Change	We agree that this information is valuable and could be considered as one of the -50 "core data fields". However, due to Privacy concerns, this information may not be disclosed at the stage of the Offer for private individuals. This is why sellers should be allowed to use a "N/D" option, explaining why the information is not available.	core data set
1.16	Counterparty	City of Counterparty	Corporate	Applicable to all	Counterparty's city, town or village.	Mandatory	Mandatory	Alphanumeric	Dynamic	12.4.9					Change	We agree that this information is valuable and could be considered as one of the -50 "core data fields". However, it does not exist in some jurisdictions, like France, for private individuals. In any way, it is subject to data protection in each jurisdiction (compatibility with GDPR to be confirmed). This is why sellers should be allowed to use a "N/D" option, explaining why the information is not available.	core data set
1.17	Counterparty	Postal code of Counterparty (corporate)	Corporate	Applicable to all	Counterparty's postal code.	Non-mandatory	Mandatory	Alphanumeric	Dynamic	12.4.10					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set

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1.18	Counterparty	Country of Counterparty (corporate)	Corporate	Applicable to all	Counterparty's country.	Mandatory	Mandatory	Choice populated by using ISO 3166-1 alpha-2 code of the country.	Dynamic		12.4.11				Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.19	Counterparty	Date of Latest Annual Financial Statements	Corporate	Applicable to all	Date of the latest available Financial Statements.	Non-mandatory	Mandatory	dd/mm/yyyy	Dynamic						Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove
1.20	Counterparty	Currency of Financial Statements	Corporate	Applicable to all	Currency in which the latest available financial statements are expressed in.	Non-mandatory	Mandatory	Choice populated by using ISO 4217 currency codes.	Static						Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove
1.21	Counterparty	Economic activity	Corporate	Applicable to all	Classification of the corporate counterparty according to its economic activity, in accordance with the NACE revision 2 statistical classification as laid down in Regulation (EC) No 1893/2006.	Non-mandatory	Mandatory	Choice populated by using the classification NACE codes-a level two, three or four NACE code in accordance with Regulation (EC) No 1893/2006.	Static		12.4.15				Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
1.22	Counterparty	Fixed Assets	Corporate	Applicable to all	Carrying amount of the corporate counterparty's fixed assets as per its latest available financial statements. Where "Fixed Assets" is defined by IAS 16 (Property, Plant and Equipment) or similar according to other accounting standards, as assets whose use is for the business operation, where a value is assigned to them, and the useful economic life is more than one year.	Non-mandatory	Non-mandatory	Number	Dynamic				IAS 16.6	Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.23	Counterparty	Current Assets	Corporate	Applicable to all	Carrying amount of the corporate counterparty's current assets, excluding cash and cash equivalent items as per its latest available financial statements. Where "Current Assets" are assets that are defined by IAS 1.60, or similar according to other accounting standards, as expected to be realised in the entity's normal operating cycle, held primarily for the purpose of trading, and expected to be realised within 12 months after the reporting period.	Non-mandatory	Non-mandatory	Number	Dynamic				IAS 1.60 IAS 1.66	Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.24	Counterparty	Cash and Cash Equivalent Items	Corporate	Applicable to all	Carrying amount of the corporate counterparty's cash and cash equivalent items as per its latest available financial statements. Where "Cash and Cash Equivalents" are defined by IAS 7 or similar according to other accounting standards, as short-term, highly liquid investments that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.	Non-mandatory	Non-mandatory	Number	Dynamic				IAS 7.6	Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.25	Counterparty	Total Assets	Corporate	Applicable to all	Carrying amount of the corporate counterparty's total assets, as defined by the applicable accounting standard, as per its latest available financial statements.	Non-mandatory	Mandatory	Number	Dynamic				IAS 1.9(a), IG 6	Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.26	Counterparty	Total Liabilities	Corporate	Applicable to all	Carrying amount of the corporate counterparty's total liabilities, as defined by the applicable accounting standard, as per its latest available financial statements.	Non-mandatory	Mandatory	Number	Dynamic				IAS 1.9(b), IG 6	Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.27	Counterparty	Total Debt	Corporate	Applicable to all	Carrying amount of the corporate counterparty's total debt as defined by the IAS 32.11 (financial liabilities) or similar applicable accounting standard, as per its latest available financial statements. It's related to all formal, written financing agreements such as short-term loans payable, long-term loans payable, and bonds payable as per the latest available financial statements.	Non-mandatory	Mandatory	Number	Dynamic				IAS 32.11	Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.28	Counterparty	Annual Turnover	Corporate	Applicable to all	Annual sales volume net of all discounts and sales taxes of the counterparty in accordance with Recommendation 2003/361/EC. Equivalent to the concept of "total annual sales" in Article 153(4) of Regulation (EU) No 575/2013.	Non-mandatory	Mandatory	Number	Dynamic		12.4.22		Art. 153(4)	Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.29	Counterparty	Annual EBIT	Corporate	Applicable to all	Amount of annual Earnings Before Interest and Tax (EBIT) generated by the corporate counterparty as per the latest available financial statements.	Non-mandatory	Non-mandatory	Number	Dynamic					Remove	This information is publicly available. Asking sellers to include it in the templates runs against the explicit objective of the templates, which is to reduce asymmetry of information between sellers and buyers. We urge the EBA not to consider that integrating public data in banks' IT systems is easy and costless because information is public. For these reasons, we recommending removing this data field from the template.	remove	
1.30	Counterparty	Contingent obligations	Corporate	Applicable to all	Indicator as to whether the institution has contingent obligations which will be part of the sale. A contingent obligation as defined in IAS 37 or similar accounting standards relates to a guarantee given by the institution in respect of the counterparty corporate's development projects or similar such arrangements. Often observable in real estate development or infrastructure development.	Mandatory	Mandatory	Boolean (Yes or No).	Static				IAS 37.10	Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove	
1.31	Counterparty	Contingent obligation amount	Corporate	Applicable to all	Value of the contingent obligation not recognised on balance sheet and measured in accordance with the applicable accounting standards.	Mandatory	Mandatory	Number	Dynamic				IAS 37.86	Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove	
1.32	Counterparty	Description of Contingent Obligations	Corporate	Applicable to all	Description of contingent obligations when "Yes" is selected in field "Contingent Obligations".	Mandatory	Mandatory	Alphanumeric	Static				IAS 37.86	Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove	
1.33	Counterparty	Date of Last Contact		Applicable to all	Date of last contact with the counterparty.	Non-mandatory	Mandatory	dd/mm/yyyy	Static				Annex X NPL ELB	Remove	This data field requires a very relevant effort for extraction compared to the add value for investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value.	remove	

1.34	Counterparty	Name of Insolvency/Restructuring Proceedings	Applicable to all	Applicable to all	Name of any insolvency or restructuring proceedings to which the counterparty is subject.	Mandatory	Mandatory	Choice dependent on the country.	Dynamic					Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
1.35	Counterparty	Status of legal proceedings	Applicable to all	Applicable to all	Categories describing a counterparty’s legal status in relation to its solvency based on the national legal framework. The institution must transpose the values listed in the ‘Field type’ column into the national legal framework.	Mandatory	Mandatory	(a) No legal action taken; (b) Under judicial administration, receivership or similar measures; (c) Bankruptcy/Insolvency; (d) Other legal measures.	Dynamic		12.4.16			Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
1.36	Counterparty	Description of other legal measures	Applicable to all	Applicable to all	Description of the status of legal proceedings when ‘Other legal measures’ is selected in data field ‘Status of legal proceedings’.	Non-mandatory	Non-mandatory	Alphanumeric	Dynamic		12.4.16			Change	We should be able to provide the information but we believe this is not “core data” for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.37	Counterparty	Date of initiation of legal proceedings	Applicable to all	Applicable to all	The date on which the legal proceedings, as reported under the field ‘status of legal proceedings’, were initiated. This date must be the most recent relevant date prior to the cut-off date and must only be reported if the field ‘Status of legal proceedings’ has a value other than ‘No legal actions taken’.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic		12.4.17			Agree	We agree this is a valuable information. However, the key information is whether a court order has been issued or not; we suggest amending this data field accordingly (same remark for 1.38 & 1.39).	core data set
1.38	Counterparty	Stage reached in legal proceedings	Applicable to all	Applicable to all	Indication of how advanced the relevant legal proceedings have become as a result of various legal steps in the legal proceedings having been completed.	Mandatory	Mandatory	Alphanumeric	Dynamic					Agree	We agree this is a valuable information. However, the key information is whether a court order has been issued or not; we suggest amending this data field accordingly (same remark for 1.37 & 1.39).	core data set
1.39	Counterparty	Proof of Claim Filed by the seller	Applicable to all	Applicable to all	Indicator as to whether the institution has filed a claim.	Non-mandatory	Non-mandatory	Boolean (Yes or No).	Dynamic					Remove	Based on our experience, this information is not requested by investors. We recommend removing it from the template.	remove
1.40	Counterparty	Distribution made to the seller	Applicable to all	Applicable to all	Indicator as to whether a distribution has been made to the institution.	Mandatory	Mandatory	Boolean (Yes or No).	Dynamic					Remove	This data field requires a very relevant effort for extraction compared to the add value for Investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank’s system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value.	remove
1.41	Counterparty	Notice for Procedure Termination	Applicable to all	Applicable to all	Indicator as to whether the notice of the end of the procedure has been given to the institution and no further collections are expected.	Non-mandatory	Non-mandatory	Boolean (Yes or No).	Dynamic					Change	We should be able to provide the information but we believe this is not “core data” for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
1.42	Counterparty	Jurisdiction of Court	Applicable to all	Applicable to all	Location of the court where the court case is being heard.	Mandatory	Mandatory	Choice operated by using ISO 3166 ALPHA-2.	Static	Annex X, NP, EL20	12.4.			Agree	We agree this is a valuable information. However, the key information is whether a court order has been issued or not; we suggest amending this data field accordingly (same remark for 1.37 & 1.38).	core data set
1.43	Counterparty	Date of Obtaining Order for Possession	Applicable to all	Applicable to all	Date that the order for possession is granted by the court.	Non-mandatory	Non-mandatory	dd/mm/yyyy	Dynamic	Annex X, NP, EL21	12.4.			Change	We believe this information is rarely required and rarely available. It is “niche data”, complex to extract and with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
1.44	Counterparty	Legal Fees Accrued	Applicable to all	Applicable to all	Total amount of legal fees accrued at the cut-off date.	Non-mandatory	Non-mandatory	Number	Dynamic					Remove	This data field requires a very relevant effort for extraction compared to the add value for Investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank’s system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value.	remove
2.00	Relationship	Counterparty Identifier	Applicable to all	Applicable to all	Institution’s internal identifier to uniquely identify each counterparty. Each counterparty must have one counterparty identifier. This value will not change over time and cannot be used as the counterparty identifier for any other counterparty.	Mandatory	Mandatory	Alphanumeric	Static		2.2.3 12.4.1			Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
2.01	Relationship	Role of the counterparty	Applicable to all	Applicable to all	Role of the counterparty (“Protection provider”, “Borrower”, “Tenant”).	Mandatory	Mandatory	Choice: (a) Protection Provider; (b) Borrower; (c) Tenant	Static					Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
2.02	Relationship	Counterparty Group Identifier	Applicable to all	Applicable to all	Institution’s internal identifier to uniquely identify each counterparty group. Counterparty group is defined as a group of related counterparties. Where a group could just be a standalone counterparty or multiple counterparties. Each counterparty group should have one counterparty group identifier.	Mandatory	Mandatory	Alphanumeric	Static					Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
2.03	Relationship	Contract Identifier	Applicable to all	Applicable to all	Institution’s internal identifier to uniquely identify each loan agreement. Each loan agreement must have one contract identifier. This value will not change over time and cannot be used as the contract identifier for any other loan agreement. Where loan means credit agreement in accordance with Article 3, point (4) of Directive (EU) 2021/2167.	Mandatory	Mandatory	Alphanumeric	Static		2.2.4			Change	We should be able to provide the information but we believe this is not “core data” for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
2.04	Relationship	Instrument Identifier	Applicable to all	Applicable to all	Institution’s internal identifier to uniquely identify each loan under a single loan agreement. Each loan must have one instrument identifier. This value will not change over time and cannot be used as the instrument identifier for any other loan under the same loan agreement. Instrument identifier may be the same as contract identifier.	Mandatory	Mandatory	Alphanumeric	Static		2.2.5			Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
2.05	Relationship	Protection Identifier	Applicable to all	Secured loan	Institution’s internal identifier to uniquely identify each protection used to secure the loan (collateral or guarantee). Each protection must have one protection identifier. This value will not change over time and cannot be used as the protection identifier for any other protection. Where the categories of the collateral and guarantee are those defined in the template F13.01 of Annexes III and IV to Implementing Regulation (EU) No 451/2021.	Mandatory	Mandatory	Alphanumeric	Static		2.2.6	Annex III and Annex IV, F 13.01		Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
3.00	Loan	Cut-off Date	Applicable to all	Applicable to all	Reference date of the data which the EBA NPL templates refer to.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic					Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
3.01	Loan	Contract Identifier	Applicable to all	Applicable to all	Institution’s internal identifier to uniquely identify each loan agreement. Each loan agreement must have one contract identifier. This value will not change over time and cannot be used as the contract identifier for any other loan agreement. Where loan means credit agreement in accordance with Article 3, point (4) of Directive (EU) 2021/2167.	Mandatory	Mandatory	Alphanumeric	Static		2.2.4			Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates, without N/D option, but only if the same information can be used as 3.02. In some markets/jurisdictions, there are no two different data for 3.01 & 3.02.	core data set
3.02	Loan	Instrument Identifier	Applicable to all	Applicable to all	Institution’s internal identifier to uniquely identify each loan under a single loan agreement. Each loan must have one instrument identifier. This value will not change over time and cannot be used as the instrument identifier for any other loan under the same loan agreement. Instrument identifier may be the same as contract identifier.	Mandatory	Mandatory	Alphanumeric	Static		2.2.5			Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
3.03	Loan	Inception date	Applicable to all	Applicable to all	The date on which the contractual relationship originated, i.e. the date on which the contract agreement became binding for all parties.	Mandatory	Mandatory	dd/mm/yyyy	Static		3.4.4			Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set
3.04	Loan	Governing Law of Loan Agreement	Applicable to all	Applicable to all	Jurisdiction governing the loan agreement. This does not necessarily correspond to the country where the loan agreement was originated.	Mandatory	Mandatory	Choice populated by using ISO 3166 ALPHA-2.	Static	Annex X, NP, EL, 23				Agree	We believe that this information is valuable and should be considered as one of the –50 “core data fields” that could be made mandatory in the NPL transaction templates.	core data set

3.05	Loan	Joint Counterparties	Applicable to all	Applicable to all	Number of counterparties who jointly owe under the loan. They are jointly responsible for payments to the lender arising under the loan agreement.	Non-mandatory	Mandatory	Choice: (a) two counterparties; (b) more than two counterparties.	Static					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.06	Loan	Asset Class	Applicable to all	Applicable to all	Asset class of the loan as defined in Article 2(1) of Commission Delegated Regulation (EU) 2020/1224.	Mandatory	Mandatory	Choice: (a) Residential real estate, (b) Commercial real estate, (c) Corporate, (d) Automobile, (e) Consumer, (f) Credit card, (g) Leasing, (h) Other	Static	Article 2(1).				Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
3.07	Loan	Type of Instrument	Applicable to all	Applicable to all	Classification of the loan according to the type of contractual terms agreed between the parties.	Mandatory	Mandatory	Choice: (a) Deposits other than reverse repurchase agreements; (b) Overdraft; (c) Credit card debt; (d) Revolving credit other than overdrafts and credit card debt; (e) Credit lines other than revolving credit; (f) Reverse repurchase agreements; (g) Trade receivables; (h) Financial leases; (i) Other loans.	Static		3.4.1			Change	This data field requires an answer which has to be provided into specific pre-defined categories: we are fine to provide the information (which in most cases we are already providing) but would ask to have more freedom as the reconciliation between the 'internal category' of the Bank and the category proposed by EBA would generate additional relevant effort without any real added value for the Investor.	optional
3.08	Loan	Amortisation type	Applicable to all	Applicable to all	Type of amortisation of the loan including principal and interest, as per the latest Loan Agreement.	Non-mandatory	Mandatory	Choice: (a) French (b) German (c) Fixed amortisation schedule (d) Bullet (e) Other	Static		3.4.1.5			Change	This data field requires a very relevant effort for extraction compared to the added value for Investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value. We suggest an optional status.	optional
3.09	Loan	Non-Performing Category	Applicable to all	Applicable to all	Non-performing category to which the loan belongs. Where the non-performing category is defined by referring to the past-due time band of FINREP template F 18.00 and in accordance with the criteria specified in paragraph 236 of Part 2 of Annex V to Implementing Regulation (EU) No 451/2021.	Mandatory	Mandatory	Choice: (a) Unlikely to pay that are not past-due or past-due <= 90 days; (b) Past-due > 90 days and <= 1 year; (c) Past-due > 1 year.	Dynamic			Annex III and IV, F 18.00 and Annex V, Part 2.23.6.		Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
3.10	Loan	Legal final maturity date	Applicable to all	Applicable to all	Contractual maturity date of the loan as at the cut-off date, taking into account any agreements amending initial contracts, including forbearance measures. This data field is required only when the categories 'Unlikely to pay that are not past-due or past-due <= 90 days' or 'Past-due > 90 days and <= 1 year' are selected in the field 'Non-performing category'.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic		3.4.6			Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.11	Loan	Currency	Applicable to all	Applicable to all	Currency denomination of the Loan, in accordance with the ISO's 4217 standard.	Mandatory	Mandatory	Choice populated by using ISO 4217 Currency Codes.	Static		3.4.3			Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.12	Loan	Outstanding nominal amount	Applicable to all	Applicable to all	Principal amount outstanding at cut-off date, including unpaid past due interest but excluding accrued interest. The outstanding nominal amount must be reported net of write-offs and write-downs as determined by the relevant accounting practices.	Mandatory	Mandatory	Number	Dynamic		4.4.9			Change	We would suggest removing this data field for business opportunity reasons (no need to disclose internal policy of the bank), or at least an optional status.	optional
3.13	Loan	Total Balance	Applicable to all	Applicable to all	Carrying amount of the loan. Where the carrying amount is defined in paragraph 27 of Part 1 of Annex V to Implementing Regulation (EU) No 451/2021.	Mandatory	Mandatory	Number	Dynamic			Annex V, Part 1.22.		Agree		core data set
3.14	Loan	Accrued interest	Applicable to all	Applicable to all	The amount of accrued interest on loans at the reporting reference date as defined in Regulation (EU) No 1071/2013 (ECB/2013/33). In accordance with the general principle of accruals accounting, interest receivable on instruments should be subject to on-balance sheet recording as it accrues (i.e. on an accruals basis) rather than when it is actually received (i.e. on a cash basis).	Non-mandatory	Mandatory	Number	Dynamic		4.4.1.1			Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.15	Loan	Other balances	Applicable to all	Applicable to all	Total amount of other outstanding amounts recognised on the balance sheet. The number should incorporate other charges, commissions, fees and other outstanding amounts not recognised under the field 'Outstanding nominal amount' or 'Accrued interest balance (on Book)'. -	Non-mandatory	Non-mandatory	Number	Dynamic					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.16	Loan	Percentage of the loan that is collateralised	Applicable to all	Secured loan	Percentage of the carrying amount of the loan that is collateralised. Where the carrying amount of the loan corresponds to the field 'Total balance'. The percentage is defined as the combined value of all collateral or guarantees, including credit insurance which secure the loan over the total balance of the loan. In case the loan is not collateralised, the percentage is 0.	Mandatory	Mandatory	Percentage	Dynamic					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.17	Loan	Legal Balance at charge-off date	Applicable to all	Applicable to all	Total claim amount (including total balance and any accrued interest balance off book) when the loan went into charge-off. A charge-off is the declaration by the institution commonly on unsecured retail when the borrower is severely delinquent, and the institution starts the recovery process officially. In case of closed position, the amount will be zero. The data field is required only when the loan goes into charge-off.	Mandatory	Mandatory	Number	Dynamic					Change	In our view, no need to disclose internal policy of the bank. We suggest an optional status.	optional
3.18	Loan	Charge-off Date	Applicable to all	Applicable to all	Date when the loan went into charge-off. A charge-off is the declaration by the institution commonly on unsecured retail when the borrower is severely delinquent, and the institution starts the recovery process officially. A charge-off does not mean a write-off of the debt entirely.	Non-mandatory	Mandatory	dd/mm/yyyy	Dynamic					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
3.19	Loan	Loan Commitment	Applicable to all	Applicable to all	Total available credit extended for the loan as at the cut-off date. It includes the undrawn committed part of the loan commitment. Where loan commitment is defined by referring to paragraph 113 of Part 2 of Annex V to Implementing Regulation (EU) No 451/2021.	Non-mandatory	Mandatory	Number	Dynamic			Annex V, Part 2.11.5.		Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.20	Loan	Interest Rate	Applicable to all	Applicable to all	Annualised agreed rate or narrowly defined interest rate in accordance with Regulation (EU) No 1072/2013 of the European Central Bank (ECB/2013/34). It's applicable at cut-off date and it takes into account any current forbearance measure. This data field is required only when the categories 'Unlikely to pay that are not past-due or past-due <= 90 days' or 'Past-due > 90 days and <= 1 year' are selected in the field 'Non-performing category'.	Non-mandatory	Mandatory	Percentage	Dynamic		4.4.1			Change	We believe it makes more sense to make this data optional: it can be provided on UTPs, but it is much less meaningful for defaulted loans.	optional
3.21	Loan	Interest Rate Type	Applicable to all	Applicable to all	Classification of loans based on the base rate for establishing the interest rate for each payment period. It's applicable at the cut-off date, which takes into account any current forbearance measure. This data field is required only when the categories 'Unlikely to pay that are not past-due or past-due <= 90 days' or 'Past-due > 90 days and <= 1 year' are selected in the field 'Non-performing category'.	Non-mandatory	Mandatory	Choice: (a) Fixed; (b) Variable; (c) Mixed.	Dynamic		3.4.8			Change	This data field requires an answer which has to be provided into specific pre-defined categories: we are fine to provide the information (which in most cases we are already providing) but would ask to have more freedom as the reconciliation between the 'internal category' of the Bank and the category proposed by EBA would generate additional relevant effort without any real added value for the Investor.	optional

3.22	Loan	Description of Interest Rate Type	Applicable to all	Applicable to all	Description of interest rate type when "Mixed" is selected in field "Interest Rate Type". This data field is required only when the categories "Unlikely to pay that are not past-due or past-due <= 90 days" or "Past-due > 90 days and <= 1 year" are selected in the field "Non-performing category".	Non-mandatory	Non-mandatory	Alphanumeric	Dynamic					Change	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
3.23	Loan	Interest rate spread/margin	Applicable to all	Applicable to all	Margin or spread (expressed as a percentage) to add to the reference rate that is used for the calculation of the interest rate in basis points. It's applicable at cut-off date, which takes into account any current forbearance measure. This data field is required only when the categories "Unlikely to pay that are not past-due or past-due <= 90 days" or "Past-due > 90 days and <= 1 year" are selected in the field "Non-performing category".	Non-mandatory	Mandatory	Percentage	Dynamic		3.4.1 2			Change	This data field requires an answer which has to be provided into specific pre-defined categories: we are fine to provide the information (which in most cases we are already providing) but would ask to have more freedom as the reconciliation between the 'internal category' of the Bank and the category proposed by EBA would generate additional relevant effort without any real added value for the investor.	optional
3.24	Loan	Reference Rate	Applicable to all	Applicable to all	Reference rate used for the calculation of the actual interest rate. Combination of the reference rate value and maturity value, applicable at cut-off date when 'Variable' is selected in field 'Current Interest Rate Type'. This data field is required only when the categories 'Unlikely to pay that are not past-due or past-due <= 90 days' or 'Past-due > 90 days and <= 1 year' are selected in the field 'Non-performing category'.	Non-mandatory	Mandatory	The reference rate code is a combination of the reference rate value and maturity value. The following reference rate values must be used: (a) Euribor, (b) USD LIBOR, (c) GBP LIBOR, (d) EUR LIBOR, (e) JPY LIBOR, (f) CHF LIBOR, (g) MWBOR, (h) Other single reference rates, (i) Other multiple reference rates. The following maturity values must be used: (a) Overnight, (b) one week, (c) two weeks, (d) three weeks, (e) one month, (f) two months, (g) three months, (h) four months, (i) five months, (j) six months, (k) seven months, (l) eight months, (m) nine months, (n) ten months, (o) eleven months, (p) twelve months. The reference rate code is formed by combination the reference rate value with	Dynamic		3.4.1 1			Change	This data field requires an answer which has to be provided into specific pre-defined categories: we are fine to provide the information (which in most cases we are already providing) but would ask to have more freedom as the reconciliation between the 'internal category' of the Bank and the category proposed by EBA would generate additional relevant effort without any real added value for the investor.	optional
3.25	Loan	Last Payment Date	Applicable to all	Applicable to all	Date that the last payment was made.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic	Annex X, NP EL 30.				Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.26	Loan	Last Payment Amount	Applicable to all	Applicable to all	Amount of last payment.	Mandatory	Mandatory	Number	Dynamic					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.27	Loan	Interest rate reset frequency	Applicable to all	Applicable to all	Frequency at which the interest rate is reset after the initial fixed-rate period, if any. It's applicable at the cut-off date, which takes into account any current forbearance measure. This data field is required only when the categories "Unlikely to pay that are not past-due or past-due <= 90 days" or "Past-due > 90 days and <= 1 year" are selected in the field "Non-performing category".	Non-mandatory	Mandatory	Choice: (a) Not resettable (b) Overnight (c) Monthly (d) Quarterly (e) Semi-annually (f) Annually (g) At creditor discretion (h) Other frequency	Dynamic		3.4.9			Change	This data field requires a very relevant effort for extraction compared to the add value for Investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value. We suggest an optional status.	optional
3.28	Loan	Payment Frequency	Applicable to all	Applicable to all	Frequency of payments due, either of principal or interest, i.e. number of months between payments. It is based on the current loan agreement as at the cut-off date, which takes into account any current forbearance measure. This data field is required only when the categories "Unlikely to pay that are not past-due or past-due <= 90 days" or "Past-due > 90 days and <= 1 year" are selected in the field "Non-performing category".	Non-mandatory	Mandatory	Choice: (a) Monthly (b) Quarterly (c) Semi-annually (d) Annually (e) Bullet (f) Zero coupon (g) Other	Dynamic		3.4.1 6			Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.29	Loan	Total Past-Due Amount	Applicable to all	Applicable to all	Carrying amount of loan that are past-due. Where the loan shall qualify as past-due where any amount of principal, interest or fee has not been paid at the date it was due as defined in paragraph 96 of Part 2 of Annex V to Implementing Regulation (EU) No 451/2021. This amount is always to be reported. '0' is to be reported if the loan was not past due at the cut-off date.	Mandatory	Mandatory	Number	Dynamic		Annex V Part 2.96			Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.30	Loan	Days in Past-Due	Applicable to all	Applicable to all	Number of days that the loan is currently past-due as at the cut-off date. Where the loan is 'past-due' where it meets the criteria of paragraph 96 of Part 2 of Annex V to Implementing Regulation (EU) No 451/2021.	Mandatory	Mandatory	Number	Dynamic		Annex V, Part 2.96			Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.31	Loan	Date of the default status of the instrument	Applicable to all	Applicable to all	The date on which the default status is considered to have occurred. Where default is as per Article 178 of Regulation (EU) No 575/2013 (CRR).	Mandatory	Mandatory	dd/mm/yyyy	Static		4.4.5	Definition of default as of Article 178		Agree	We believe that this information is valuable and should be considered as one of the ~50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
3.32	Loan	Total balance at date of default	Applicable to all	Applicable to all	Carrying amount of the loan at the date of default. Where default is as per Article 178 of Regulation (EU) No 575/2013 (CRR). The carrying amount is defined in paragraph 27 of Part 1 of Annex V to Implementing Regulation (EU) No 451/2021.	Non-mandatory	Mandatory	Number	Static		Annex V, Part 2.27	Definition of default as of Article 178		Change	In many cases, this information is not requested by investors. We recommend an optional status.	optional
3.33	Loan	Syndicated Loan	Applicable to all	Applicable to all	Indicator as to whether the loan is provided by a syndicate or consortium of two or more credit institutions. This means that in the case of a syndicated loan the institution holds less than 100% of the total loan.	Mandatory	Mandatory	Boolean (Yes or No).	Static					Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
3.34	Loan	Syndicated Portion	Applicable to all	Applicable to all	Percentage of the portion held by the institution. Applicable when "Yes" is selected in field "Syndicated Loan".	Non-mandatory	Non-mandatory	Percentage	Static	Annex X, NP EL 31				Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional

3.35	Loan	Securitised	Applicable to all	Applicable to all	Indicator as to whether the loan has been securitised or within covered bond pool.	Mandatory	Mandatory	Boolean (Yes or No).	Static						Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove
3.36	Loan	Specialised Product	Applicable to all	Applicable to all	Indicator as to whether the loan is a specialised product. Specialised products are those which are considered by the institution as non-common loan agreements, as they consider their potential split of the loan into different parts or other similar arrangements.	Non-mandatory	Mandatory	Boolean (Yes or No).	Static						Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove
3.37	Loan	Lease agreement	Applicable to all	Secured loan	Indicator as to whether the credit agreement contains a lease.	Mandatory	Mandatory	Boolean (Yes or No).	Static					IFRS 16.9	Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.38	Loan	Start Date of Lease	Applicable to all	Secured loan	Date that the current lease starts if 'yes' is selected in the field 'Lease agreement'.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.39	Loan	End Date of Lease	Applicable to all	Secured loan	Date that the current lease ends if 'yes' is selected in the field 'Lease agreement'.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.40	Loan	Lease Break Option	Applicable to all	Secured loan	Details of any lease break clause(s) if 'yes' is selected in the field 'Lease agreement'.	Non-mandatory	Non-mandatory	Alphanumeric	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.41	Loan	Type of Lease	Applicable to all	Secured loan	Type of the lease agreement with the counterparty if 'yes' is selected in the field 'Lease agreement'.	Non-mandatory	Non-mandatory	Choice: (a) Triple Net (Tenant pays the base rental amount plus operating costs, including real estate taxes, insurance, maintenance, and repairs). (b) Net-Net Lease (Tenant pays the base rental amount, real estate taxes, and insurance reimbursements).	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.42	Loan	Forbearance measure	Applicable to all	Applicable to all	Indicator as to whether forbearance measures are currently applied to the loan at the cut-off date.	Mandatory	Mandatory	Boolean (Yes or No).	Static					Art. 47b	Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.43	Loan	Type of Forbearance measure	Applicable to all	Applicable to all	Types of forbearance as defined in accordance with the criteria and the definitions specified in paragraphs 357 and 358 of Part 2 of Annex V to Implementing Regulation (EU) No 451/2021. Applicable when 'yes' is selected in the field 'Forbearance measure'.	Mandatory	Mandatory	Choice: (a) grace period/payment moratorium; (b) interest rate reduction; (c) extension of maturity/term; (d) rescheduled payments; (e) debt forgiveness; (f) debt asset swaps; (g) other forbearance measures.	Dynamic					Annex V, Part 2, 357, 358.	Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.44	Loan	Number of historical forbearance	Applicable to all	Applicable to all	Number of forbearance(s) that happened in the last two years. Applicable when 'yes' is selected in the field 'Forbearance measure'.	Non-mandatory	Non-mandatory	Number	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.45	Loan	Debt Forgiveness	Applicable to all	Applicable to all	Gross carrying amount of the loan that was forgiven as part of current forbearance measure, including principal forgiveness agreed by external collection agencies, as at the cut-off date. Where debt forgiveness refers to a partial cancellation of the loan by the institution through forfeiture of right to legally recover it as specified in paragraph 358 of Part 2 of Annex V to Implementing Regulation (EU) No 451/2021. The gross carrying amount is defined in accordance with paragraph 34, Part 1 of Annex V to Implementing Regulation (EU) No 451/2021. Applicable when the category (e) debt forgiveness is selected in the field 'Type of Forbearance'.	Non-mandatory	Mandatory	Number	Static					Annex V, Part 1, 134 and Part 2, 358.	Change	This is important information but it differs very much between jurisdictions. These complex situations do not fit within one single definition.	optional
3.46	Loan	Start Date of Forbearance measure	Applicable to all	Applicable to all	Date that the current forbearance measure commenced. Applicable when 'yes' is selected in the field 'Forbearance measure'.	Non-mandatory	Mandatory	dd/mm/yyyy	Dynamic						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.47	Loan	End Date of Forbearance measure	Applicable to all	Applicable to all	Date that the current forbearance measure ends. Applicable when 'yes' is selected in the field 'Forbearance measure'.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic					Annex X, NPEL 41	Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
3.48	Loan	Clause to Stop Forbearance	Applicable to all	Applicable to all	Indicator as to whether a clause exists to allow the institution to stop the current forbearance measure. Applicable when 'yes' is selected in the field 'Forbearance measure'.	Non-mandatory	Mandatory	Boolean (Yes or No).	Static						Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove
3.49	Loan	Description of the Forbearance Clause	Applicable to all	Applicable to all	Further comments/details on the clause. Applicable when "Yes" is selected in field "Clause to Stop Forbearance".	Non-mandatory	Mandatory	Alphanumeric	Static						Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove
4.00	Collateral guarantee and enforcement	Protection Identifier	Applicable to all	Secured loan	Institution's internal identifier to uniquely identify each protection used to secure the loan (collateral or guarantee). Each protection must have one protection identifier. This value will not change over time and cannot be used as the protection identifier for any other protection. Where the categories of the collateral and guarantee are those defined in the template FT3.01 of Annexes III and IV to Implementing Regulation (EU) No 451/2021.	Mandatory	Mandatory	Alphanumeric	Static					2.2.6 Annex III and IV, F 13.01	Agree	We believe that this information is valuable and should be considered as one of the ~50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.01	Collateral guarantee and enforcement	Legal Owner of the collateral	Applicable to all	Secured loan	Legal owner of the immovable or movable property collateral. Applicable to all immovable (real estate) or movable (other physical) collateral.	Mandatory	Mandatory	Alphanumeric	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
4.02	Collateral guarantee and enforcement	Type of immovable property	Applicable to all	Secured loan	Type of the immovable property collateral. Applicable to all immovable (real estate) collateral.	Mandatory	Mandatory	Choice: (a) Semi-detached house; (b) Detached house;	Static						Agree	We believe that this information is valuable and should be considered as one of the ~50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set

4.03	Collateral guarantee and enforcement	Type of movable property, other collateral and guarantee	Applicable to all	Secured loan	Type of movable property, other collateral and guarantee. Applicable to collateral (other than immovable property) and guarantees.	Mandatory	Mandatory	Choice: (a) Auto Mobile Vehicles; (b) Industrial Vehicles; (c) Commercial Trucks; (d) Rail Vehicles; (e) Nautical Commercial Vehicles; (f) Nautical Leisure Vehicles; (g) Aeroplanes; (h) Machine Tools; (i) Industrial Equipment; (j) Office Equipment; (k) Medical Equipment; (l) Energy Related Equipment; (m) Other Vehicles; (n) Other Equipment; (o) Other goods/inventory; (p) Equity and debt Securities; (q) Financial Guarantee; (r) Corporate guarantee (s) Life Insurance; (t) Cash, Deposit [debt securities issued]; (u) Floating Charge; (v) Other asset.	Static				F13-01	Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
4.04	Collateral guarantee and enforcement	Mortgage amount	Applicable to all	Secured loan	The maximum amount (including any fees, expenses, and liens on the immovable property) that the institution is entitled to receive in a foreclosure of the immovable property, which serves as collateral for the mortgage, as registered in the official deed register. Applicable if a mortgage lien has been established on the collateral.	Mandatory	Mandatory	Number	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.05	Collateral guarantee and enforcement	Lien position	Applicable to all	Secured loan	The highest ranking position held by the institution in relation to the immovable property collateral which determines the order in which the law recognises the institution's claims against the collateral in a foreclosure. Applicable if the lien (a mortgage deed or a deed of trust) is recorded against the title to the collateral in the official deed records.	Mandatory	Mandatory	Number	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.06	Collateral guarantee and enforcement	Higher Ranking Loan	Applicable to all	Secured loan	The amount that higher ranking claimants/holders of first position liens are entitled to receive before the institution in a foreclosure of the collateral. The purpose of this field is to provide an indication of the extent to which the institution will be able to recoup the outstanding debt from the collateral in a foreclosure after first position liens have been settled in full. Applicable if the institution does not have the highest ranking position in relation to the collateral.	Mandatory	Mandatory	Number	Static					Remove	This data field requires a very relevant effort for extraction compared to the add value for Investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value.	remove
4.07	Collateral guarantee and enforcement	Register of Deeds Number	Applicable to all	Secured loan	Registration number under which the institution's lien (a mortgage deed or a deed of trust) against the title to the collateral is recorded in the official deed records. Applicable if the institution has a lien on the collateral.	Mandatory	Mandatory	Alphanumeric	Static					Change	This data field requires a very relevant effort for extraction compared to the add value for Investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value. In our view, this data field should be removed, or at least optional.	optional
4.08	Collateral guarantee and enforcement	Sector of Immovable Property	Applicable to all	Secured loan	Sector which the immovable property is used for. Applicable to all immovable (real estate) collateral.	Mandatory	Mandatory	Choice: (a) commercial real estate (CRE); (b) residential real estate (RRE).	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.09	Collateral guarantee and enforcement	Type of Occupancy	Applicable to all	Secured loan	Type of occupancy for immovable property collateral. If the property has a mixed use, it can be classified according to its dominant use (based for example on the surface areas dedicated to each use). Applicable to all immovable (real estate) collateral.	Non-mandatory	Non-mandatory	Choice: (a) Owner-occupied; (b) Partially owner-occupied, defined as a property that is partly rented; (c) Tenanted; (d) Vacant; (e) Other.	Dynamic					Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and/or with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
4.10	Collateral guarantee and enforcement	Address of Immovable property	Applicable to all	Secured loan	Street address where the immovable property is located at, including flat/house, number or name. Applicable to all immovable (real estate) collateral.	Non-mandatory	Non-mandatory	Alphanumeric	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.11	Collateral guarantee and enforcement	City of Immovable Property	Applicable to all	Secured loan	City where the immovable property is located at. Applicable to all immovable (real estate) collateral.	Mandatory	Mandatory	Choice populated by using UN/LOCODE.	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.12	Collateral guarantee and enforcement	Immovable property Postcode	Applicable to all	Secured loan	Postcode where the immovable Property is located at. Applicable to all immovable (real estate) collateral.	Non-mandatory	Mandatory	Alphanumeric	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.13	Collateral guarantee and enforcement	Immovable property Country	Applicable to all	Secured loan	Region or country where the immovable property collateral is located. Applicable to all immovable (real estate) collateral.	Mandatory	Mandatory	Choice populated by using ISO 3166 ALPHA-2 of the country in which the collateral is located.	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.14	Collateral guarantee and enforcement	Building Area (M2)	Applicable to all	Secured loan	Building area (square metres) of the immovable property. Applicable to all immovable (real estate) collateral.	Non-mandatory	Mandatory	Number	Static					Agree	We believe that this information is valuable and should be considered as one of the -50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.15	Collateral guarantee and enforcement	Land Area (M2)	Applicable to all	Secured loan	Land area surrounding the immovable property (square metres). Applicable to all immovable (real estate) collateral.	Non-mandatory	Non-mandatory	Number	Static					Remove	This data field requires a very relevant effort for extraction compared to the add value for Investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value.	remove
4.16	Collateral guarantee and enforcement	Currency of collateral and guarantee	Applicable to all	Secured loan	Currency that the valuation and cash flows related to the collateral or guarantee are expressed in. Applicable to all type of collateral (immovable and movable property) and guarantees.	Mandatory	Mandatory	Choice field populated by using ISO 4217 Currency Codes.	Static					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
4.17	Collateral guarantee and enforcement	Latest Internal Valuation Amount	Applicable to all	Secured loan	The value of the collateral as established for the relevant type of collateral following the chosen internal valuation approach, when last assessed at or prior to the cut-off date. This reflects the value of the collateral, without considering any (regulatory) haircuts. This data field is required when the institution has performed an internal valuation.	Mandatory	Mandatory	Number	Dynamic					Change	Real estate valuation: as already highlighted and commented last year, external public sources (registry) can be more neutral than the actual information of banks. Some are in the control of the seller, yet administrative burden to provide them is too high compared with the purpose. Additionally these data would lead to a bias in the determination of the bid price that would distort competition. In our view, this data field should be at least optional.	optional
4.18	Collateral guarantee and enforcement	Date of Latest Internal Valuation	Applicable to all	Secured loan	Date that the latest internal valuation as reported in the field "latest internal valuation amount" took place at or prior to the cut-off date. Applicable when the institution has performed an internal valuation.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic					Change	Real estate valuation: as already highlighted and commented last year, external public sources (registry) can be more neutral than the actual information of banks. Some are in the control of the seller, yet administrative burden to provide them is too high compared with the purpose. Additionally these data would lead to a bias in the determination of the bid price that would distort competition. In our view, this data field should be at least optional.	optional

4.19	Collateral guarantee and enforcement	Latest External Valuation Amount	Applicable to all	Secured loan	The value of the collateral as established for the relevant type of collateral following the chosen external valuation approach, when last assessed at or prior to the cut-off date. This reflects the value of the collateral, without considering any (regulatory) haircuts. This data field is required when the institution has asked for an external valuation.	Mandatory	Mandatory	Number	Dynamic					Change	This field is important but should not be made mandatory for all portfolios in all countries. For business opportunities reasons, we believe that buyers could have access to more neutral information from external public sources, such as registries.	optional
4.20	Collateral guarantee and enforcement	Date of Latest External Valuation	Applicable to all	Secured loan	Date that the latest external valuation as reported in the field 'latest external valuation amount' took place at or prior to the cut-off date. Applicable when the institution has had an external valuation performed.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic					Change	This field is important but should not be made mandatory for all portfolios in all countries. For business opportunities reasons, we believe that buyers could have access to more neutral information from external public sources, such as registries.	optional
4.21	Collateral guarantee and enforcement	Type of Latest Internal Valuation	Applicable to all	Secured loan	Type of the latest internal valuation for the collateral as reported in the field 'Latest internal valuation amount'. Applicable when the institution has performed an internal valuation.	Mandatory	Mandatory	Choice: (a) Full Appraisal; (b) Drive-by; (c) Automated Valuation Model; (d) Indexed; (e) Desktop; (f) Managing or Estate Agent; (g) Purchase Price; (h) Hair Cut; (i) Mark to market; (j) Counterparties Valuation; Or none	Dynamic					Change	Real estate valuation: as already highlighted and commented last year, external public sources (registry) can be more neutral than the actual information of banks. Some are in the control of the seller, yet administrative burden to provide them is too high compared with the purpose. Additionally these data would lead to a bias in the determination of the bid price that would distort competition. In our view, this data field should be at least optional.	optional
4.22	Collateral guarantee and enforcement	Type of Latest External Valuation	Applicable to all	Secured loan	Type of the latest external valuation for the collateral as reported in the field 'Latest external valuation amount'. Applicable when the institution has had an external valuation performed.	Mandatory	Mandatory	Choice: (a) Full Appraisal; (b) Drive-by; (c) Automated Valuation Model; (d) Indexed; (e) Desktop; (f) Managing or Estate Agent; (g) Purchase Price; (h) Hair Cut; (i) Mark to market; (j) Counterparties Valuation; Or none	Dynamic					Change	Real estate valuation: as already highlighted and commented last year, external public sources (registry) can be more neutral than the actual information of banks. Some are in the control of the seller, yet administrative burden to provide them is too high compared with the purpose. Additionally these data would lead to a bias in the determination of the bid price that would distort competition. In our view, this data field should be at least optional.	optional
4.23	Collateral guarantee and enforcement	Completion of immovable property	Applicable to all	Secured loan	Indicator as to whether the construction of the immovable property is complete.	Non-mandatory	Mandatory	Boolean (Yes or No).	Dynamic					Change	Based on our experience, this information is not requested by investors. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
4.24	Collateral guarantee and enforcement	Percentage complete	Applicable to all	Secured loan	The percentage of completion of the construction of the immovable property. Applicable to immovable property under development (i.e. if "No" is reported in the field "Completion of immovable property").	Non-mandatory	Mandatory	Percentage	Dynamic	Annex X, NP EC 6				Remove	Based on our experience, this information is not requested by investors. We recommend removing it from the template.	remove
4.25	Collateral guarantee and enforcement	Value of Energy Performance Certificate	Applicable to all	Secured loan	For immovable property collateral, value stated on the Energy Performance Certificate as defined in the EU Energy Efficiency Directive 2012. Applicable to all immovable (real estate) collateral.	Non-mandatory	Mandatory	Choice: (a) A; (b) B; (c) C; (d) D; (e) E; (f) F; (g) C	Static					Remove	Based on our experience, this information is not requested by investors. From a cost-benefit analysis, this data field should be removed.	remove
4.26	Collateral guarantee and enforcement	Financial Guarantee Amount	Applicable to all	Secured loan	Maximum amount of the guarantee that can be considered as defined in paragraph 119 of Annex V, Part 2 to Commission Implementing Regulation (EU) 2021/451, i.e. for financial guarantees received, the "maximum amount of the guarantee that can be considered" is the maximum amount the guarantor would have to pay if the guarantee is called on. Applicable when "Financial Guarantee" is selected in the field "Type of movable property, other collateral and guarantee".	Mandatory	Mandatory	Number	Static	Annex V Part 2 11 9				Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and/or with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
4.27	Collateral guarantee and enforcement	Activation of Financial Guarantee	Applicable to all	Secured loan	Indicator as to whether the financial guarantee has been called on. Applicable when "Financial Guarantee" is selected in the field "Type of movable property, other collateral and guarantee".	Mandatory	Mandatory	Boolean (Yes or No).	Dynamic					Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and/or with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
4.28	Collateral guarantee and enforcement	Eligibility of financial guarantee	Applicable to all	Secured loan	Indicator as to whether the financial guarantee is eligible as unfunded credit protection as defined in line with Article 212 of the Regulation (EU) No 575/2013 (CRD). Applicable when "Financial Guarantee" is selected in the field "Type of movable property, other collateral and guarantee".	Non-mandatory	Mandatory	Boolean (Yes or No).	Static			Art. 213(1)		Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and/or with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
4.29	Collateral guarantee and enforcement	ISIN	Applicable to all	Secured loan	ISIN number in accordance with the ISIN Holdings data. Applicable when "Equity and debt Securities" is selected in the field "Type of movable property, other collateral and guarantee".	Mandatory	Mandatory	Number	Change					Change	Depending on the type of loan, this information is rarely required and rarely available. It is "niche data", complex to extract and/or with limited value for the investor. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
4.30	Collateral guarantee and enforcement	Purchased under resale agreement	Applicable to all	Secured loan	Indicator as to whether the collateral was purchased with an agreement to resell it at a later stage. Applicable when "Equity and debt Securities" is selected in the field "Type of movable property, other collateral and guarantee".	Mandatory	Mandatory	Boolean (Yes or No).	Remove					Remove	This data field requires a very relevant effort for extraction compared to the add value for investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value.	remove
4.31	Collateral guarantee and enforcement	Rehypothecation of collateral	Applicable to all	Secured loan	Indicator as to whether the collateral has been encumbered as defined in paragraph 1.7 of Annex XVI to Commission Implementing Regulation (EU) 2021/451, i.e. an asset shall be treated as encumbered if it has been pledged or if it is subject to any form of arrangement to secure, collateralise or credit enhance any transaction from which it cannot be freely withdrawn.	Mandatory	Mandatory	Boolean (Yes or No).	Remove					Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove
4.32	Collateral guarantee and enforcement	Enforcement Status	Applicable to all	Secured loan	Indicator as to whether the collateral has entered into the enforcement process as at cut-off date. Applicable to all type of collateral (immovable and movable property).	Mandatory	Mandatory	Boolean (Yes or No).	Dynamic	Annex X, NP EC 7				Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
4.33	Collateral guarantee and enforcement	Enforcement Status Third Parties	Applicable to all	Secured loan	Indicator as to whether any other secured creditors have taken steps to enforce security over the collateral as at the cut-off date. Applicable to all type of collateral (immovable and movable property).	Non-mandatory	Non-mandatory	Boolean (Yes or No).	Dynamic	Annex X, NP EC 8				Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove
4.34	Collateral guarantee and enforcement	Jurisdiction of Court	Applicable to all	Secured loan	Country of the court responsible for execution of the enforcement process. Applicable when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	Choice populated by using ISO 3166 ALPHA-2.	Static					Agree	We believe that this information is valuable and should be considered as one of the ~50 "core data fields" that could be made mandatory in the NPL transaction templates.	core data set
4.35	Collateral guarantee and enforcement	Currency of Enforcement	Applicable to all	Secured loan	Currency that the items related to enforcement are expressed in. Applicable when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	Choice populated by using ISO 4217 Currency Codes.	Static					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
4.36	Collateral guarantee and enforcement	Indicator of Enforcement	Applicable to all	Secured loan	Indicator as to whether the enforcement process has been entered into by the corporate or private individual counterparty. Applicable when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	Boolean (Yes or No).	Dynamic					Change	Depending on the type of loan, this data field requires a very relevant effort for extraction compared to the add value for investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional

4.37	Collateral guarantee and enforcement	Court Appraisal Amount	Applicable to all	Secured loan	Court appraisal amount of the collateral. Applicable when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	Number	Dynamic	Annex X.NP EC 12					Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
4.38	Collateral guarantee and enforcement	Date of Court Appraisal	Applicable to all	Secured loan	Date that the court appraisal happened. Applicable if a court appraisal has occurred, when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic	Annex X.NP EC 13					Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
4.39	Collateral guarantee and enforcement	Sale Agreed Price	Applicable to all	Secured loan	Agreed price for the disposal of the collateral. Applicable when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	Number	Dynamic	Annex X.NP EC 19					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
4.40	Collateral guarantee and enforcement	Collateral Repossessed Date	Applicable to all	Secured loan	Date when the lienholder takes possession of an item from its registered owner that was used as collateral for a loan. Applicable when 'yes' is selected in the field 'Enforcement status'.	Non-mandatory	Non-mandatory	dd/mm/yyyy	Dynamic						Remove	We believe this information is rarely required and rarely available. It is "niche data", complex to extract and with limited value for the investor. From a cost-benefit analysis, we suggest removing this data field.	remove
4.41	Collateral guarantee and enforcement	Next Auction Date	Applicable to all	Secured loan	Date of the next intended auction to sell the collateral. Applicable when 'yes' is selected in the field 'Enforcement status'.	Non-mandatory	Non-mandatory	dd/mm/yyyy	Dynamic	Annex X.NP EC 23					Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
4.42	Collateral guarantee and enforcement	Court Auction Reserve Price for Next Auction	Applicable to all	Secured loan	Court set reserve price for next auction. The amount is the minimum price required by the court. Applicable when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	Number	Dynamic	Annex X.NP EC 24					Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
4.43	Collateral guarantee and enforcement	Last Auction Date	Applicable to all	Secured loan	Date that the last auction was performed in order to sell the collateral. Applicable when 'yes' is selected in the field 'Enforcement status'.	Mandatory	Mandatory	dd/mm/yyyy	Dynamic	Annex X.NP EC 25					Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
4.44	Collateral guarantee and enforcement	Court Auction Reserve Price for Last Auction	Applicable to all	Secured loan	Court set reserve price for last auction. This is the minimum price required by the court. Applicable when 'yes' is selected in the field 'Enforcement status'.	Non-mandatory	Mandatory	Number	Dynamic	Annex X.NP EC 26					Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
4.45	Collateral guarantee and enforcement	Number of Failed Auctions	Applicable to all	Secured loan	Number of failed previous auctions for the collateral. Applicable when 'yes' is selected in the field 'Enforcement status'.	Non-mandatory	Non-mandatory	Number	Dynamic	Annex X.NP EC 27					Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
5.00	Historical collection and repayment	Contract Identifier	Applicable to all	Applicable to all	Institution's internal identifier to uniquely identify each loan agreement. Each loan agreement must have one contract identifier. This value will not change over time and cannot be used as the contract identifier for any other loan agreement. Where loan means credit agreement in accordance with Article 3, point (4) of Directive (EU) 2021/2167.	Mandatory	Mandatory	Alphanumeric	Static		2.2.4				Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
5.01	Historical collection and repayment	Instrument Identifier	Applicable to all	Applicable to all	Institution's internal identifier to uniquely identify each loan under a single loan agreement. Each loan must have one instrument identifier. This value will not change over time and cannot be used as the instrument identifier for any other loan under the same loan agreement. Instrument identifier may be the same as contract identifier.	Mandatory	Mandatory	Alphanumeric	Static		2.2.5				Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
5.02	Historical collection and repayment	Type of External Collection	Applicable to all	Applicable to all	Indicator as to whether the external collections have been prepared at counterparty or loan level. The field is required only in case of external collection.	Non-mandatory	Mandatory	Choice: (a) Counterparty; (b) Loan.	Static	Annex X.NP EL 34					Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
5.03	Historical collection and repayment	Institution's internal identifier for the Loan / Counterparty	Applicable to all	Applicable to all	Institution's internal identifier for either the counterparty or the loan as defined in the field 'Type of External Collection'. The field is required only in case of external collection.	Mandatory	Mandatory	Alphanumeric	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
5.04	Historical collection and repayment	Name of External Collection Agent	Applicable to all	Applicable to all	Name of the external collection agent. The field is required only in case of external collection.	Mandatory	Mandatory	Alphanumeric	Static						Change	This data field should be made optional, as it depends if the placement can be stopped or whether there is some legal constraint that the placement has to be continued by the issuer.	optional
5.05	Historical collection and repayment	Registration Number	Applicable to all	Applicable to all	Company registration number of the external collection agent according to the registration with the country specific registration office. The field is required only in case of external collection.	Mandatory	Mandatory	Number	Static						Change	Based on our experience, this information is not requested by investors. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
5.06	Historical collection and repayment	Total Repayment Schedule	Applicable to all	Applicable to all	Total repayment schedule over the next thirty-six months from the cut-off date. Where repayment amounts are reported monthly for the first next year after the cut-off date and annually for the other two following years in separate columns. The repayment schedule takes into account any forbearance measure granted at or prior to the cut-off date.	Mandatory	Mandatory	Number	Dynamic						Change	Depending on the type of loan, this data field requires a very relevant effort for extraction compared to the add value for investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value. From a cost-benefit analysis, this data field should be removed, or at least optional.	optional
5.07	Historical collection and repayment	Cash Recoveries	Applicable to all	Applicable to all	Total cash recoveries collected by the external collection agent. The field is required only in case of external collection.	Non-mandatory	Mandatory	Number	Static						Change	We should be able to provide the information but we believe this is not "core data" for valuation purposes. We suggest making it optional. We will provide the information if it is available and in our systems (but this can depend based on the type of NPL and the country).	optional
5.08	Historical collection and repayment	History of Total Repayments	Applicable to all	Applicable to all	Repayment amounts received in the last two years before the cut-off date and after the default date. If the default date occurred within the last two years from the cut-off date, the total amount collected from the default date to the cut-off date shall be provided. The repayment amounts are reported annually and they include any collection by external collection agencies. Where each annual amount is presented in a separate column.	Mandatory	Mandatory	Number	Dynamic						Agree	We believe that this information is valuable and should be considered as one of the –50 'core data fields' that could be made mandatory in the NPL transaction templates.	core data set
5.09	Historical collection and repayment	History of Repayments - From Asset Sales	Applicable to all	Secured loan	Repayment amounts received within the last two years from the cut-off date, the total amount collected from the default date to the cut-off date shall be provided. Where each annual amount is presented in a separate column.	Non-mandatory	Mandatory	Number	Dynamic						Remove	This data field requires a very relevant effort for extraction compared to the add value for investor. In some cases, it may be provided if asked by ad hoc extractions based on business opportunity. It may also not be available in a structured way in the Bank's system. Overall, we believe that asking banks to industrialize the production of this data would imply huge efforts without commensurate added value.	remove