COVID- 19: Summary of National Payment Moratoria Measures in Europe

June 2020

INTRODUCTION

The current situation is fast-moving. The information below reflects our understanding of payment moratoria measures and other reliefs related to the COVID-19 pandemic as at 9 June 2020.

In many cases the legislation, guidance or other materials relating to these measures is limited in detail. This means that in some instances questions remain about the scope of some of these measures.

While most governments have taken steps to mandate or encourage payment holidays or other relief for consumers and/or mortgage loans, the measures are not entirely comprehensive in all jurisdictions. This means that in some jurisdictions the governmental measures only apply to specific lenders or specific types of borrowers.

To-date, we are not aware of any measure which would address the impact of COVID-19 payment delays or payment holidays on securitisations or other asset-backed financings of these assets. As a result parties will need to consider their transaction documents to establish:

1. whether payment holidays or extensions which are not mandated by government measures or regulatory requirements can be made and/or whether existing servicing procedures would need to be amended to facilitate this.
2. how payment holidays are treated in any default or delinquency tests.

Clearly, these measures and/or the economic impact of COVID-19 may lead to increased losses and/or liquidity reserve or liquidity facility drawings under existing transactions.

It is also worth noting that the EBA published detailed guidance on the criteria to be fulfilled by legislative and non-legislative moratoria applied before 30 June 2020 ("the EBA Guidelines"). The EBA Guidelines came into force on 2 April 2020. The aim of the EBA Guidelines is to clarify the requirements for public and private moratoria, which if fulfilled, will help avoid the classification of exposures under the definition of forbearance or as defaulted under distressed restructuring. While the EBA is supportive of measures and initiatives being taken in EU member states, it highlights the importance of ensuring that risk is identified and measured accurately, stating that "*institutions must continue to adequately identify those situations where short-term payment challenges may transpose into long-term financial difficulties and eventually lead to insolvency*". The conditions that general legislative and non-legislative payment moratoria must fulfil in order not to be considered forbearance include:

- The moratorium was launched in response to the COVID-19 pandemic;
- The moratorium has to be broadly applied;
- The moratorium has to apply to a broad range of obligors;

- The moratorium offers the same conditions to all clients (but different moratoria may apply to different types of exposures or obligors);
- The moratorium changes only the schedule of payments
- The moratorium does not apply to new loans granted after the launch of the moratorium.

EBA Guidelines

The EBA Guidelines state that institutions must collect information on the scope and effect of the use of the moratoria and share it with national competent authorities and such authorities should inform the EBA of the use of moratoria in their jurisdiction. The EBA may amend the Guidelines in the future to cover moratoria applied after 30 June 2020. For further information, please see our summary of the guidance, which is available here.

We recommend that parties monitor the EBA Guidelines in order to assess whether relevant national payment moratoria applicable to them lead to exposures qualifying as forbearance or as defaulted under distressed restructuring. The EBA has published a compliance table, which contains a list of all competent authorities in the EU and EEA-EFTA States and European Territories and, subject to various provisos, is designed to summarise whether they comply or intend to comply with the EBA Guidelines. As at 9 June 2020, most member states have provided information on compliance/non-compliance except for Finland, Slovakia, Portugal and Romania. The UK, Croatia and Slovenia have confirmed that they do not comply or do not intend to comply with the EBA Guidelines.

In addition, in April 2020, the EBA issued a statement which provides further clarity on how the EBA Guidelines on legislative and non-legislative moratoria on loan repayments apply to securitisations. The EBA has also issued an "Interpretative Communication" on the EU's accounting and prudential framework which clarifies the treatment of moratoria under such frameworks.

In June 2020, the EBA published Guidelines on new additional reporting and disclosure of exposures subject to measures taken by national governments and EU bodies to address the economic impact of the COVID-19 pandemic, such as legislative moratoria on loan repayments. The Guidelines, which are addressed to credit institutions and competent authorities specify the content and format of the new additional disclosures These additional reporting and disclosure requirements are expected to be time-limited as they are being introduced strictly in the context of the COVID-19 pandemic. The first quarterly reporting reference date and the first semi-annual disclosure reference date will be **30 June 2020**. Note that the final form of the Guidelines is yet to be published- they need to be translated into the official languages of the EU-hence the guidelines do not contain an application date. National competent authorities must notify the EBA as to whether they comply or intend to comply with the new guidelines by 2 August 2020.

Table of Contents

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
Belgium	On 21 March 2020, the Belgian federal government, the National Bank of Belgium and the banking sector have agreed on a series of measures targeted at tackling the impact of the COVID-19 crisis and providing the possibility to reschedule existing debt. One of the two measures is that the banking sector commits itself to grant credit payment deferrals on corporate credits and mortgage credits for a maximum of 6 months and until 31 October 2020 at the latest, without any costs or fees being payable by the borrower. For corporate credits, the scope is limited to credits subject to fixed instalments, overdraft facilities and fixed advance payments. By contrast, leasing and factoring are excluded. The second credit payment deferral measure includes residential mortgage credits granted to individuals. Both the principal amount and interests do not have to be reimbursed. Borrowers benefiting from credit payment deferral (corporate credits) are non-financial enterprises, SME's, self-employed persons and non-profit organisations that cumulatively meet the following 4 conditions: • The enterprise experiences payment difficulties as a result of the corona	SMEs, unsecured consumer and RMBS	*Federal Guarantee* The second measure agreed upon on 21 March 2020 is the establishment of a guarantee scheme to extend additional financing to Belgian corporates and self-employed persons. The federal government activated a guarantee scheme for all new credits and facilities with a duration of up to 12 months. Refinanced credits extended prior to 1 April 2020, redrawing/revolving credit facilities extended prior to 1 April 2020, credits to be applied solely for non-Belgian activities and 'deselected credits' are excluded. Banks may deselect guaranteed credits and consider them as out of scope (up to 15% of their allocated envelope). The guarantee scheme will have a maximum amount of EUR 50 billion (or an amount reflecting the borrower's liquidity needs during a maximum of 12 months, or 18 months for SMEs, including self-employed traders) and will be available to cover all such credits and facilities entered into between 1 April 2020 and 30 September 2020. The federal guarantee scheme includes all credits regardless of the form, except for leasing, factoring, consumer and residential mortgage credits. Credit providers are credit institutions (or branches of EU credit institutions) having outstanding exposures on 31 December 2019 on one or more borrowers amounting to a minimum of EUR 20,000 each (55 credit institutions, with 15 representing 98% of market shares). The federal guarantee includes new credits and credit lines granted to **viable non-financial companies**, small and medium enterprises, self-employed persons and non-profit organisations (excluding enterprises

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	crisis; • The enterprise is permanently established in Belgium; • The enterprise was not already in default with regard to current credits or tax payments or social security contributions on 1 February 2020, or had less than 30 days arrears on its current credits, its tax payments or social security contributions on 29 February 2020; • The enterprise has performed its contractual obligations with all banks during the last 12 months prior to 31 January 2020 and is not subject to active credit restructuring. The measure applied from 1 April 2020. This lenient position towards debtors was adopted by the Belgian banking sector federation (*Febelfin*) **based on charters** concluded between all members. If companies meet the aforementioned criteria, banks do not have leeway. On 5 June 2020, the Belgian federal government and Febelfin have agreed to allow borrowers (for corporate credits and mortgage credits to individuals) that have requested and obtained a deferral of payment, to apply on 31		active in the financial sector and government entities). 'Viable non-financial companies are those which: • have no arrears on 1 February 2020 under any existing credits, taxes or social security contributions; or no more than 30 days in arrears on 29 February 2020 under any existing credits, taxes or social security contributions; • are not subject to "active credit restructuring" (not defined) on 31 January 2020 (i.e. restructuring filings as of 1 February are covered); and • are not considered as being "in difficulties" on 31 December 2019 (within the meaning of EU State Aid Regulation). Losses incurred under these facilities will be examined at the end of the guarantee scheme and will be allocated between the financial sector and the federal government as follows: • A first tranche equal to 3% of losses will be borne entirely by the financial sector; • The amount between 3% and 5% of losses will be borne equally (50-50) by the financial sector and public authorities; and • For all losses above 5%, 80% will be borne by public authorities and 20% by the financial sector. As of 1 July 2021 and by 31 March 2023 at the latest, banks will have to call on the federal guarantee. There is no need to provide evidence of upfront losses at the time of application, but ultimately evidence of the effective losses incurred, taking into account acceleration of the credit

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	October 2020 for a further deferral until 31 December 2020 – if they still meet all conditions. **NOTE:** the above is based on a publication of Febelfin dated 5 June 2020. This will need to be further formalized in a revised set of measures which we have not yet seen on the date of this summary.		and enforcing all other security interests, will need to be provided. The Federal Guarantee scheme was approved by the European Commission on 11 April 2020. On 5 June 2020, the Belgian federal government and Febelfin also agreed : (i) to extend the federal guarantee until 31 December 2020 (initially until 30 September 2020); and (ii) to extend the federal guarantee duration for SMEs with up to 50 employees – which often need longer-term credits (up to 36 months). Therefore, an additional guarantee scheme will be provided for credits with a duration between 12 and 36 months. The viability criteria and the losses allocation between the financial sector and the federal government will be amended in the coming days accordingly. The new agreement would provide for a loss allocation on all defaults of 80% for the federal government and 20% for the banks. Please note that these amendments only apply to SMEs with up to 50 employees and may therefore create a difference in treatment that will have to be justified by the Belgian federal authorities. Of the EUR 50 billion made available by the federal authorities to guarantee corporate credits, EUR 10 billion is now specifically earmarked for SMEs. This is yet to be confirmed. The Belgian authorities are currently negotiating with the European Commission to further extend the federal guarantee scope without contravening EU state aid rules.

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
			NOTE: The above is based on a publication of Febelfin dated 5 June 2020. This will need to be further formalized in a revised set of measures which we have not yet seen on the date of this summary. *Credendo Bridge Guarantee Scheme* Credendo (the Belgian public ECA) is strengthening its support for Belgian exporting companies – active in Belgium and carrying out international operations (at least 30% of the company's turnover generated in 2019) – by providing a new bridge guarantee, covering maximum 80% of the bank's risks on bridge loans provided to these companies and up to EUR 10 million per beneficiary. The Credendo bridge guarantee scheme was approved by the European Commission on 14 May 2020 for an estimated budget up to EUR 500 million with the maximum budget capped at approximately EUR 1.8 billion. Guarantees to be granted under this scheme will be first-demand guarantees – which means that they will be callable without the need to establish a final loss on the loan or on the portfolio, and without the need to first attempt to recover the loan from the borrower or from other collateral – and will cover both the principal amount and the loan interest due during the full maturity period of the loan. The Credendo bridge guarantee scheme is open to all sectors except government entities and companies that are part of the financial sector. Guarantees under this scheme may be granted from 14 May 2020 until 30 September 2020. *Insurance* The federation of insurance companies (*Assuralia*) has agreed on a package of measures (automatic premium reduction and premium payment deferral) in favour of vulnerable natural persons and companies

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
			to overcome the financial difficulties caused by the COVID-19 crisis. Along with this initiative, a memorandum of understanding has been signed on 21 April 2020 between the Belgian State, Credendo, Assuralia and the private credit insurers to support the Belgian economy by maintaining the credit limits granted by private credit insurers to companies located in Belgium through a reinsurance programme enabling private credit insurers to continue to play their part in spite of the COVID-19 crisis. The reinsurance programme wasapproved by the European Commission on 15 May 2020 for a maximum budget of EUR 903.2 million.
France	On 15 March 2020*, French banks (through the French Banking Federation) announced that French banks would implement the following measures (among others): • accelerated credit instruction procedures for stressed cash flow situations, within 5 days, and special attention paid to emergency situations; • deferral of loan repayments for businesses, up to six months; • cancellation of penalties and additional costs due to the extension of deadlines requested by companies. **Note that these measures only apply to lending by banks and not other lenders.** ***no further press releases to date***		The Public Investment Bank (BPI) has set up certain measures to support businesses. Firstly, it undertakes to cover up to 90% of the amount of loans taken out by companies with their credit institutions. The eligible loans are new mid or long-term (2 to 7 years) amortisable financings (e.g. credit, movable and immovable property leasings, financial leases) and new or renewal of short-term financings intended to finance the operating cycle of companies (e.g. overdrafts, overdraft facilities, *Dailly*) which have been confirmed for a period of 12 months. Conversely, this excludes refinancings of mid or long-term outstanding loans, repayment of convertible bonds, transactions relating to the repurchase of loans, guarantees, etc...). ** The guarantee is accessible to SMEs, but also to mid-size companies (ETI). The measures announced by BPI are reserved for companies that did not have financial difficulties before the COVID-19 crisis;

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	Ordinance No. 2020-306, as amended, provides for a suspension, during the Grace Period, of periodic penalty payments ordered by certain courts or administrative authorities and of the effectiveness or enforcement of contractual measures (i.e. penalty payments, penal clauses, cancellation clauses and acceleration clauses aiming at penalising the non-performance of an obligation within a specified period of time) when the due date of the obligation(s) of the defaulting debtor occurred during the Grace Period (the "**Extension Period**"). The Grace Period started on 12 March 2020 and will expire on the date of termination of the COVID-19 health emergency (as of today, the Grace Period is deemed to end on 23 June 2020 (included), subject to further extension). It covers in particular the clauses which penalise a debtor when it has not performed an obligation within a specified period. If the period within which the debtor was required to perform his obligation has expired during the Grace Period, periodic penalty payments, penal clauses, cancellation clauses and acceleration clauses are deemed not to have taken effect or to have effect. These clauses will not take effect until the expiration of a period calculated as follows after the expiry of the Grace Period: the number of days elapsed between:		Secondly, the BPI directly grants loans (e.g. medium-term loans without collateral over 3 to 5 years to SMEs and ETIs, co-financed by the banks, and loans for SMEs, co-financed by the Regions, for a period of 7 years, both with deferred principal repayments for a certain period of time) ; and Thirdly, as from 16 March 2020 and subject to reasoned request, BPI automatically postpones the payments of all the loan instalments (principal and interest) and property leasing payments, for a period of 6 months, without any administrative fees. Other measures by BPI include help to specific companies (such as start-ups or exporting companies). ** The fact that the BPI guarantee could be extended to existing financings and not only to new financings has not been announced. <u>The French State</u> has set up a global envelope of 300 billion euros to guarantee new loans granted from 16 March 2020 until 31 December 2020 (included) by credit institutions and finance companies and lenders participating in crowdfunding transactions to certain non-financial businesses incorporated in France and affected by the consequences of the COVID-19 epidemic. This direct, irrevocable and unconditional government guarantee issued by the French State, valid for the entire duration of the loan, is in addition to the guarantee arrangements set up by BPI described above. Certain conditions of these loans are regulated and include in particular the following requirements: (i) an initial one-year period (which can be further extended for a period ranging from one year to another five years at the option of the borrower); such loan to include one year of deferred principal repayment, (ii) an amount subject to a threshold depending on

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	(1) the earlier of (x) 12 March 2020 and (y) the date on which the debtor's obligation arose; and (2) the date on which the debtor's obligation should have been performed, if the debtor has not performed his obligation by then. Obligations (other than payment obligations) due after the end of the Grace Period will also benefit from a delay equal to the number of days elapsed between (1) the earlier of (x) 12 March 2020 and (y) the date on which the debtor's obligation arose and (2) the end of the Grace Period. If such clauses took effect before 12 March 2020, they will be suspended until the end of the Grace Period. **<u>Please note</u>** that the financial obligations and related guarantees mentioned in Articles L. 211-36 et seq. of the French Monetary and Financial Code are excluded from the suspension under the Ordinance. This exclusion covers (i) most transactions between financial and other regulated counterparties and (ii) transactions in financial securities where at least one party thereto is a financial entity. Consequently, for these financial obligations and the related guarantees, the clauses seeking to penalise a default by the debtor would be fully effective,		the number of employees or turnover of the company and (iii) the cost of these loans should only consist of the cost of the financing specific to each bank (interest rate), without margin and the cost of the State guarantee for the entire duration of the loan. In addition, the amount guaranteed by the French State on these loans will depend on the size of the company ranging from 70% to 90%. Conditions to call on the State guarantee are also regulated. <u>Companies whose activity is affected by the COVID-19 health crisis may request to defer the payment of their social contributions and direct taxes</u> (i.e. which excludes indirect taxes and VAT) which are due for the month of March 2020 and April 2020. The deferrals are granted automatically, unconditionally, without penalty and for up to 3 months or for a longer period, if necessary. In addition, the payment of taxes due on May 2020 will also be deferred until 30 June 2020 and the payment of social contributions due on June 2020 may also be deferred subject to conditions which are specific depending on the number of employees of the relevant company. The deferred payment of taxes and social contributions will not apply to companies with at least 5.000 employees and a consolidated turnover of more than 1,5 billion euros which distribute dividends or repurchase shares in 2020 (except companies which have a legal obligation to distribute dividends or if such dividends are intragroup and are distributed to financially support a French company of the group). In addition, companies which distributed dividends or repurchased shares before 27 March 2020 can still benefit from the deferrals. In addition, an undertaking not to distribute dividends or repurchase shares in 2020 must be formalised with the tax and social contributions authorities. Finally, certain companies which could face insolvency may be exempt from the payment of taxes and social contributions on a case by case

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	even if the period within which the debtor was bound to perform its obligation had expired during the Grace Period. Although not expressly stated in the Ordinances, the legislative report accompanying Ordinance No. 2020-247 - (the "**Legislative Report**") states that the parties to a contract are free to waive the application of the provisions above relating to the extension of delays of certain contractual provisions by way of express provisions. On 17 April 2020, the French Minister of Justice published a circular to the attention of the French courts, confirming the above.		basis. A solidarity fund has been set up for individuals and small companies having an economic activity (criteria to be satisfied are for example: 10 or less employees, turnover (without taxes) inferior to 1 million euros) <u>In addition,</u> the law amending the finance law for 2020 has implemented the following measures: - the total amount granted to the Economic and Social Development Fund (*Fonds de Développement Economique et Social*) is increased by 1 billion euros. This fund is authorised to grant loans and financial guarantees to companies facing financial difficulties; - a total amount of 20 billion euros is allocated to financially support large companies strategic to the national economy through, as the case may be, the *Agence des Participations de l'Etat* (by purchasing shares in such companies); - a scheme to advance reimbursable loans for a total amount of 500 million euros to companies which cannot obtain new banking financings because of their financial fragility. The legal regime of this scheme is uncertain.
Germany	A new act was passed by the Parliament on 25 March 2020 and will be endorsed by the Federal Council on 27 March 2020 to introduce statutory payment holidays for loans and open end leases where payments cannot be made due to COVID-19. Payment holidays will be limited to consumers and small enterprises, whilst, the application for	Loan securitisation and securitisation of open end leases	On 20 March 2020 the Parliament also passed an act introducing a real economy stabilisation fund. The fund may: • grant guarantees for bonds or other liabilities; • purchase shares or other forms of equity; and

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	small enterprises will require an additional governmental ordinance. Consumers may be able to pause their loan or lease instalments if the making of such payment would jeopardise their cost of living. Small enterprises may be able to pause their loan or lease payments if such payment cannot be made or would jeopardise the continuation of such enterprise's business. All exemptions are subject to the payment difficulties resulting from the COVID 19 pandemic and the payment obligations result from loan agreements that were entered into before 8 March 2020 or 15 March 2020 in the case of open end leases. The payment holidays will end on 30 June 2020, but such period may be extended by the Federal government until 30 September 2020 or longer if the pandemic continues.		• grant subordinated debt or other forms of hybrid capital. Only companies from the real economy that met at least two of the following criteria before 1 January 2020 are eligible for such stabilisation measures: • total assets in excess of € 43m; • turnover in excess of € 50m; and • more than 249 employees on annual average. Bank lending to companies has been made easier mostly through massive state aid programs on various levels - the most important component of which are state guarantees to secure bank lending up to 100% of the loan amount – and legislative changes in insolvency and related laws which permit loans to companies in need of liquidity without a number of restrictions that usually apply. This includes relief of requirements applicable to new loans and new security to companies in a crisis, a change of the automatic subordination of shareholder loans in the insolvency of a company, and the limitation of the management´s duty (and the creditors´ possibility) to file for insolvency for reasons of illiquidity of a company. There have also been legislative changes with respect to consumer loans – borrowers may defer payments to creditors for up to three months provided these non-payments are caused by economic consequences of the Covid pandemic (see separate article on retail lending).

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
Greece	• The Greek Banks Association announced that loan instalments for performing loans granted to businesses directly affected by COVID-19 are suspended at least until 30 September 2020. During this period, debtors have to pay only interest on their loans and no payments of principal and can contact their bank to submit the relevant request for suspension. • A three-month suspension applies in respect of loan instalments for performing loans to individuals (private employees or self-employed) affected by suspension of business operations due to COVID-19 and being eligible for a €800 special compensation. • On 19 March 2020 the Association of the Bank Loan and Credit Servicing Companies announced the decision of its member-companies to facilitate debtors directly affected by the measures imposed by the Greek Government due to the pandemic. In this context, the measures to be taken include the following: ◦ communication with debtors in order to record the affected households and businesses;		• A state subsidy scheme has been introduced for interest under loans granted by banks to SMEs directly affected by the COVID-19 (excluding SMEs operating in the primary production of agricultural products and in the sectors of fishery and aquaculture). The state subsidy is granted on application by the lending banks, will be paid in three instalments and covers the contractual interest (and the levy of Law 128/1975) under term loans, bond loans and current account credit facilities granted to eligible SMEs provided that such loans and credit facilities were performing as of 31 December 2019. The subsidy does not cover default interest or other expenses and does not apply to syndicated loans. • An electronic platform has been established for the implementation of the temporary state aid scheme in the form of repayable advances for business undertakings. The deadline for applications was 19 May 2020. A grace period until 31 December 2021 applies for payment of principal and interest. After such grace period, state aid received must be repaid in 40 equal monthly instalments, together with interest, on the last day of each month. Subject to certain reduced turnover or preservation of employment posts triggers being met, the undertaking may be permitted to repay only part of the state aid (60% or 70% as applicable). • A state aid scheme has been introduced in the form of guarantees granted by the Hellenic Development Bank (HDB), for eligible working capital loans. The guarantee covers 80% of the eligible costs (outstanding balance, interest and levy of law 128/1975) for term loans (including bond loans) meeting certain eligibility criteria. The newly established "COVID-19 Guarantee Fund" of the HDB will be responsible for the implementation of the scheme which will be co-financed by the EU structural funds (ESIF), thus increasing the total budget to €2.25bn instead of the initially approved amount of

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	• the proposal of customised solutions based on the financial profile of the debtor, whether individual or business, by offering the option of reduction or suspension of instalments payable for a three-month period; • the immediate suspension of payment of instalments for a three-month period for debtors who are eligible for the €800 special purpose compensation; • the suspension of any communications relating to any payments in arrears with debtors who claim a proven severe and factual inability to perform their payment obligations; and • the instruction of external partners, such as debt notification companies and legal offices, to fully synchronize the content and frequency of their direct communications with debtors regarding the above actions. Each Bank Loan and Credit Servicing Company must specify the implementation of the above measures, depending on its		€2bn. • The HDB introduced an interest subsidy scheme for businesses affected by COVID-19, for working capital loans granted by credit institutions. • A 40% rent reduction applies for March, April, May and June 2020 for businesses whose operations have been suspended or have been seriously affected by Covid-19. The above rent reduction also applies to primary residence tenancy agreements. In case of partial payment of the rent the lessor is not entitled to terminate the lease agreement. For commercial leases for business establishments and financial leasing agreements for business purposes, an extension for the payment of 40% of the rent applies for March, April and May 2020. The outstanding 40% of the rent must be paid in up to 12 monthly instalments for financial leasing agreements of immovable property and up to 6 monthly instalments for financial leasing agreements of movable property. • Payment of certain taxes and social security contributions may be deferred for affected businesses and individuals, while those not benefiting from the deferral will get a discount at the rate of 25% • Specific measures apply to employment relationships, including for the suspension of employment agreements in order to avoid dismissals (without an adverse impact on social security coverage of the suspended employees). Such measures continue to apply until 31 July 2020 for affected businesses in the sectors of tourism, transportations, culture and sports, and until 30 June 2020 for affected businesses in the food and beverage sector. A state subsidy scheme has been introduced for the social security contributions of

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	capacity and the needs of each debtor. • A three-month suspension period applies for all deadlines concerning the procedural acts and instalment payments for debtors having applied for or currently in debt settlement agreements under Laws 4605/2019, 4469/2017 and 3869/2010, concerning protection of primary residence and out-of-court settlement of debts of individuals and of business undertakings. Deadline for the submission of application of Law 4605 is extended to 31 July 2020. Debtors not included to those severely affected by the COVID-19 may also benefit from such suspension upon submission of an application to the creditor and evaluation thereof by the latter. • A 75-days suspension applies for the deadlines concerning the presentation and payment of securities (i.e. cheques, bills of exchange and promissory notes), electronically notified to the banks by the persons having a right or an obligation under those securities. The measure applies to business undertakings whose operations have mandatorily been suspended or which have been severely affected by the Covid-19 pandemic provided that the persons have a right or an obligation under those securities. Holders of cheques not included in the list of affected		employees whose employment contracts have been suspended. • The suspension of the operation of the courts has been lifted from 1 June 2020, except that criminal courts operate only for urgent proceedings. • Land registers, cadastres and pledge registers are now fully operating. The same applies to tax, local and other authorities, except that each of them may accept applications and meetings only subject to prior appointment. • Specifically for banks, certain restrictions have been imposed on transactions at bank branches, so that withdrawals of relatively small amounts are only made through ATMs (and all other transactions concerning bank accounts, payments of utility bills etc. are made through e-banking). The maximum amount of each payment made by contactless credit card (without use of a PIN) has been increased. • The deadline (being 30 April 2020) for the publication by companies listed on the Athens Exchange, of their annual financial statements for the year 2019, has been extended by two months.

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	businesses, may apply to benefit (from 1 April 2020) from the suspension of their insurance and tax obligations, provided that the amount of the cheques so suspended exceeds 20% of their average monthly turnover for 2019. The above suspension has been extended by 60 days.		
Hungary	On 18 March 2020 the Hungarian Government introduced a payment holiday in relation to payment obligation of debtors under loan, facility and financial leasing agreements if financing was provided in a business-like manner (i.e. performed on a regular basis, for consideration or for the purpose of achieving profit and in relation to the conclusion of deals which cannot be specified in advance individually (i.e. made available to the public.)) and drawdown had been made on or before 18 March 2020. According to such provisions, • debtors are not obliged to repay outstanding principal amount, interest and fees under existing loan, facilities and financial leasing agreements; • the payment holiday applies until 31 December 2020, which period can be extended by the Hungarian Government;	All types (excluding one-off transactions between individuals)	On 18 March 2020 the Hungarian Government announced, in addition to payment holiday, the following measures: • The overall APR (‘*THM’ in Hungarian*) on new consumer loans taken out after 18 March 2020 shall be capped at the Hungarian National Bank base rate plus 5%. On the basis of the Government Decree published on 24 March 2020, such provisions shall apply to contracts concluded after 18 March 2020 until 31 December 2020. Unless this period gets extended regarding the APR, following this date, the APR specified in the announcement of the creditor concerned effective on the date of the conclusion of the credit contract shall apply. • For sectors seriously impacted by COVID-19 (i.e. tourism, hospitality, entertainment, sports and cultural services and passenger transport), several measures were announced. These include that workers’ contributions are significantly reduced until June 30 2020, meaning they do not have to pay pension contributions, and healthcare contributions are reduced to the statutory minimum. Taxpayers will be relieved of their flat tax liability until June 30 2020. In these sectors, tenancy agreements cannot be terminated until June 30 2020 and rents cannot be increased during the emergency period, the tourism

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	- the debtors may still make payment in accordance with the original contract terms; - the payment holiday applies to guarantees and other ancillary securities; - deadlines for the performance of contractual obligations shall be extended by the period of the payment holiday; - agreements maturing during the state of emergency shall be extended automatically until 31 December 2020. On 24 March 2020 the Hungarian Government announced some specific rules in relation to the above payment holiday provisions as follows: - neither during nor after the period of the payment holiday shall the principal be increased by the amount of the interest not paid during the period of the payment holiday; - interest accrued during the period of the payment holiday shall be paid, together with instalments due within the remaining maturity period, after the end of the period of the payment holiday,		development contribution will be removed and will not be paid. - Decisions have also been taken by the government to make work rules more flexible so that employers and employees can agree more easily On 23 March 2020, the Hungarian Government announced further measures as follows: - Small businesses are exempt from paying KATA (Small Business Taxation Tax) until June 30 2020. - KATA debts incurred before March 2020 will not, however, be exempt from government emergency announcements. - Hungarian media service providers are exempt from any tax due to lost advertising revenue Foreign direct investment screening: - With effect of 26 May, the Hungarian Government introduced an FDI screening mechanism generally applicable to non-EU investors (and in certain cases also to investors within the EU) with an extensive definition of strategic industries including, among others, financial services, health services, retail, TMT and tourism, in addition to 'traditional' strategic sectors, affecting investment and exit opportunities. With effect of 29 May 2020, the Hungarian Government introduced certain extraordinary provisions applicable during the state of emergency regarding the initiation of an insolvent liquidation proceedings against a debtor on the basis of the debtor's undisputed or acknowledged contractual debt as follows:

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	within the maturity period, annually in equal instalments; • after the end of the period of the payment holiday, maturity period shall be extended in a way that the sum of the amount of instalments due and the amount of instalments of the interest accrued during the period of the payment holiday does not exceed the amount of the instalments set out in the original contract. • rules on interests shall apply to fees as well.		• the debtor shall be granted with an additional period of 75 days during which the debtor may perform its payment obligation, in addition to the deadline provided by the creditor to the debtor for performance in the payment notice prior to the initiation of the insolvent liquidation proceedings. In this case the maximum period that may be granted by the court to the debtor to perform its payment obligation shall be reduced from 45 days to 15 days; • the minimum amount of the debt (excluding interest and contributions) shall exceed HUF 400,000 (approx.. EUR 1,140) (instead of HUF 200,000 (approx.. EUR 570)).
Ireland	No legislative measures have been imposed by the Irish government to date. The five Irish retail banks (AIB, Bank of Ireland, KBC, permanent tsb and Ulster Bank) announced in March 2020 have agreed in principle to adhere to a voluntary scheme where flexible arrangements, including three month payment breaks, will be available to personal and business customers impacted by COVID-19. A further announcement was made in April 2020 extending the payment breaks from three to six months. The availability of such measures is assessed on a case-by-case basis and affected customers must contact their lender directly to avail of such measures. As of 28 May	RMBS Unsecured consumer loans SME Our expectation is that the measures will apply to lending activities in Ireland which are subject to regulation by the Central Bank of Ireland	• Deferral of court proceedings: The five retail banks and eight non-bank lenders/ credit servicing firms have agreed to defer court proceedings for three months for businesses, employees and personal customers who are 'impacted' by COVID-19. It is not currently specified if and how any impact will be measured or whether the deferral applies in a blanket way to all proceedings. It is not specified what is meant by 'business' and so the scope of the deferral for non-personal consumers is unclear. It is not yet clear how receiver appointments will be managed where a loan default is triggered during the three month period. These provisions have not been extended beyond a three month period. • Residential tenancies: Emergency legislation has been introduced in respect of residential tenancies to prevent (i) rent increases; and (ii) the service of termination notices for a three

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	2020, 140,000 payment breaks have been granted (78,000 of those in respect of mortgages and 35,800 in respect of SME loans). Eight non-bank lenders and credit servicing firms have confirmed they will support the measures developed by the retail banks and will introduce similar payment breaks.		month emergency period. • Restart grant and rates waiver: A restart grant has been introduced for businesses impacted by COVID-19 measures and a three month commercial rates waiver (effective 27 March 2020) has been introduced for businesses forced to close due to public health requirements. • Warehousing of tax liabilities: A 12 month warehousing of tax liabilities is in place for affected business once trading restarts during which time there will be no debt enforcement action taken by Revenue and no interest charge accruing in respect of the warehoused debt. Pending the enactment of legislation to cater for this, Revenue will operate this scheme on an administrative basis. • Corporate Tax Residency: The Irish Revenue will disregard the presence of directors, employee and other agents of a non-Irish company outside of Ireland for purposes of Irish corporate tax residency or the taxable presence in Ireland of a foreign entity. • Other supports: Retail banks will make other supports available to business customers, including credit, cash flow, supply chain support, extension of credit lines, risk guarantees and trade finance. Various state and other financial aid programs have been introduced to support SMEs, Small Mid-Cap enterprises, micro-enterprises and Enterprise Ireland clients, including direct finance schemes, loan guarantee schemes and grants. Support is also available for medium and large enterprises via the Pandemic Stabilisation and Recovery Fund, a EUR2 billion fund, which will be operated by Ireland Strategic Investment Fund.

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
Italy	On 17 March 2020, the Cura Italia Decree introduced a payment suspension and moratorium for loans granted to SMEs and micro-enterprises. Micro-enterprises and SMEs with a registered office in Italy can benefit from the following financial measures in relation to debt exposures to banks, financial intermediaries and other entities authorised to granting credit in Italy: -overdraft facilities and loans granted over discount of receivables outstanding as at 29 February 2020 shall not be revoked or cancelled, in whole or in part, until 30 September 2020; -loans with bullet repayments having a maturity falling prior to 30 September 2020 shall be extended until 30 September 2020; -payments of instalments and lease payments relating to loans and other financings repayable in instalments (including agricultural bills of exchange ("cambiali agrarie")), including their ancillary elements and without any formality, are suspended until 30 September 2020 without additional or increased charges; enterprises are also allowed to request suspension only with respect of the principal component of the instalments. The relevant amortisation plan shall be deemed to be extended accordingly. Such measures do not apply to debt exposures	SME RMBS Auto & lease	The Cura Italia also introduced: • an extension of the Solidarity fund for "first home" loans (Fondo di Solidarità per i mutui per l'acquisto della prima casa); • measures relating to the support through guarantees granted by Cassa depositi e prestiti; • tax incentives facilitating the sale of non-performing loans; and • measures relating to export credit. On 8 April 2020, the Liquidity Decree provided public guarantee schemes through: • a public guarantee granted by SACE (the Italian Export Credit Agency) covering loans to Italian enterprises, including SMEs and Mid Cap; and • Guarantee granted by the SMEs central guarantee fund (*Fondo Centrale di Garanzia*), widening the scope of application of, and facilitating the access to, the fund, in order to give additional support to Italian SMEs (these measures repealed those already enacted with the Cura Italia Decree). Additional measures enacted by the Liquidity Decree relate aimed at • supporting export credit and internationalisation of Italian enterprises;

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	classified as non-performing at the date of publication of the Cura Italia Decree. In addition to the legislative moratorium measures introduced by the Cura Italia Decree, the Italian Banking Association (ABI) and certain other Italian associations entered into various moratorium agreements providing voluntary payments suspension and moratorium measures in relation to specific loans and debtors, in accordance with the terms set out thereunder. Such measures are not mandatory and may be granted upon discretion by banks and financial intermediaries. The most relevant moratorium agreements are the following: -Addendum to the *Accordo per il Credito 2019,* entered into between ABI and some category associations on 6 March 2020 which envisaged the possibility of extending the maturity of the loans outstanding as at 31 January 2020 set out in the *Accordo per il Credito 2019* for SMEs impacted by Covid-19. On 22 May 2020, the Addendum wasextended also to large companies other than SMEs which may request the granting of the mentioned measures until 30 June 2020. -ABI Moratoria, entered into between ABI and several Italian consumer associations on 21 April which envisages the suspension of the		• ensuring the business continuity of Italian enterprises. On 19 May 2020, among the measures to support the Italian economy, the Rilancio Decree provided for, *inter alia*: • the establishment of the SMEs Asset Fund (*Fondo Patrimonio PMI*) aimed at subscribing new bonds or debt securities issued by medium-sized enterprises; • the possibility for Cassa depositi e prestiti to set up a so-called Allocated Asset (*Patrimonio Destinato*), with assets contributed by the Italian Ministry of Economy and Finance which may be liquidated or refinanced; • the possibility, in the context of existing NPLs securitisations having the guarantee of the Italian State (so called GACS) and subject to the agreement of the transaction parties, to temporarily not apply the subordination and deferral mechanism of the servicing fees as a consequence of the underperformance of the servicing recovery activities; • the SACE guarantee in favour of insurance companies granting credit insurance policies on trade receivables; • transfer of the tax credit to banks and financial intermediaries, arising from "green" interventions and certain activities such as boutiques and shops, leases of real estate for non-residential use, sanitation of working environments, adaptation of working environments; and • the state guarantee granted by the Italian Ministry of Economy and Finance on Italian banks' liabilities and on loans discretionally granted by the Bank of Italy to Italian banks to face

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	principal repayment in respect of certain types of unsecured loans and mortgage loans advanced before 31 January 2020, including, among the others, loans assigned in the context of securitisation and covered bonds deals regulated by Law 130/999. Such measures cannot apply to debt exposures classified as non-performing, subsidised loans, insured loans and loans secured by the assignment of one-fifth of the salary, pension or assisted by a delegation of payment to the relevant employer (CQS). -ASSOFIN Moratoria, proposed by the Italian Consumer Credit and Real Estate Association (ASSOFIN) to its members on April 2020 which has envisaged a payment moratorium scheme involving the suspension of payments in favour of consumers and families in respect of existing consumer loans, including leasing, and CQS loan having the features set out thereunder. Such measures cannot apply to debt exposures classified as non-performing.		liquidity crisis.
Luxembourg	Until recently, the approach taken by the Luxembourg government was to provide financial help to debtors rather than requiring payment holidays for private loans. As such, no payment holidays or similar for private loans were announced before 8 April 2020. On 8 April 2020, a draft bill was published, which provides for temporary payment holiday		Relief measures regarding tax and social payments have been announced. The legal timeframes provided in relation to the declaration of bankruptcy on the debtor's initiative (*faillite sur aveu*) in case of suspension of payments has been suspended for the duration of the state of emergency. On 6 April 2020, a legislative proposal has been launched requesting:

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	measures for payments on consumer loans and loans given to micro, small and medium-sized enterprises (as defined in the Commission Recommendation 2003/361/EC). Pursuant to the draft bill, subject to the fulfilment of specific conditions and provided that the debtor's ability to pay principal and/or interest is directly impaired by the Covid-19 crisis: (i) payments on principal and interest becoming due from 1 April 2020 up until 30 June 2020 on loans existing before 16 March 2020 are suspended if the debtor is considered unable to meet its payment obligations (this is presumed to be the case where there is an inability to meet essential needs). A debtor remains free to make timely repayments, in which case (i) will not apply; (ii) by way of derogation to (i), the parties may instead agree to amend the terms of repayment (for example, by adjusting payments made on account of interest and principal or arranging partial repayment); (iii) in case the borrower's financial situation is considerably deteriorated within the period cited above, the termination of the loan agreement by the lender is precluded and all measures against the borrower are suspended; (iv) in case the parties cannot come to an agreement for the period following 30 June		(i) extension of the suspension regime for the declaration of bankruptcy on debtor's initiative (*faillite sur aveu*) for another 2 months following termination of the state of emergency; and (ii) a prohibition (*irrecevabilité*) on creditors being able to request that a debtor be declared bankrupt (*faillite sur assignation*) during the state of emergency and for another 2 months following termination of the state of emergency.

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	2020, maturity will be automatically prolonged up until the date falling 3 months after the original maturity. The above measures would not apply where the suspension and payment holiday measures are considered inadequate, taking into account all the circumstances of each case. Since the Luxembourg Prime Minister declared the state of emergency, various financial guarantee arrangements (among others, one from the Luxembourg Chamber of Commerce) have been created to guarantee bank loans. This will apply to companies in need of financial help because of temporary cash flow issues. On 18 April 2020, Luxembourg passed a law providing for state guarantees to be extended as security for loans granted, within the period from 18 March 2020 until 31 December 2020, to companies facing temporary financial difficulties directly due to the Covid-19 crisis, subject to certain conditions and eligibility criteria. At the end of March 2020, the Luxembourg Government adopted a draft law, creating direct financial aid for small or middle sized companies directly affected by the Covid-19 crisis. The law was adopted on 3 April 2020. The aid: (i) is capped to 50% of a range of eligible expenses defined in such law; (ii) cannot exceed EUR 500.000 (measured on		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	the level of the controlling company); (iii) should be granted before 1 October 2020; and (iv) takes the form of a repayable loan. Larger companies and people who are self-employed have also been included in the scope of this measure, subject to certain conditions. Moreover, a legislative proposal has been announced, proposing compensation for micro enterprises and the self-employed which are not obliged to suspend their activities, but still face a de facto reduction of their turnover directly due to the COVID-19 crisis. At the outset of the COVID-19 pandemic, there were no announcements from industry bodies or lenders in the market to offer payment holidays or rescheduling for borrowers impacted by COVID-19. We have, however, heard that certain banks have already been granting, upon request and on a discretionary basis, payment holidays or rescheduling to certain borrowers. On 17 April 2020, a memorandum of understanding (the "**MoU**") was entered into by and between Banque de Luxembourg, BGL BNP Paribas, ING, Banque Internationale de Luxembourg, Spuerkees and Raiffeisen, under the auspices of ABBL (the Luxembourg Bankers' Association). The MoU provides for a moratorium for up to 6		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	months to be granted, to Luxembourg companies upon request for business loans and payments on business lease contracts existing on 18 March 2020, subject to specific terms and conditions and with the exception of: (i) loans in connection with which, on 18 March 2020, repayment difficulties were already noted; and (ii) loans granted to property developers for the purchase / sale / development phases. It should be noted that such payment moratoria may only be granted if the company provides sufficient evidence (to be assessed by the respective bank) that it is suffering from short-term liquidity problems as a result of the Covid-19 crisis (i.e. not by unrelated matters). The basic evidence required is set out below: • a fall in turnover or activity; • recourse to temporary or full unemployment; and • total or partial closure due to measures taken by the authorities to contain the COVID-19. The moratorium must take effect before 30 June 2020. Borrowers should contact their relevant bank in relation to requests for payment		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	moratoria. On 30 April 2020, the Commission de Surveillance du Secteur Financier (CSSF) released circular 20/741 stating that it will integrate EBA Guidelines EBA/GL/2020/02 into its administrative and regulatory practice.		
Netherlands	No government measures have been introduced or proposed (as at 24/4/2020). On 19 March 2020, the largest banks in The Netherlands (ABN AMRO Bank, ING Bank, Rabobank, Volksbank and Triodos Bank) have decided to introduce a relief measure which gives corporate (SME) clients in all sectors, which have: • satisfactory prospects for profitability and continuity; and • a financing with a limit of EUR 2,5 million, a six months' postponement of their repayment obligations and in some cases a postponement of interest payments. The criteria to apply for such relief measure differ for each bank. As of 23 March 2020, ABN AMRO Bank (together with Florius and Moneyou), Rabobank, ING Bank, Volksbank and Triodos Bank,	SME	Other governmental measures have been introduced, such as a temporary tax relief and guarantees for loans granted to SMEs and large corporations. A joint working-group, led by the representative bodies of Dutch mortgage loans originators, and together with the government, announced that originators should ensure that homeowners, who are temporarily unable to pay their mortgage due to the COVID-19 outbreak, will not be subject to a foreclosure of their property until - at least - the 1st of July. The intention is for originators to seek for a solution with homeowners, for example by deferring payment. Homeowners are called upon to look for financial support. It is still possible to sell the property if the originator and the homeowner decide that this is the best solution for both parties. In this respect, the NHG has announced that it can also offer tailored protection to people who are faced with the economic consequences of the COVID-19 outbreak. For detailed information it is required to contact the relevant bank and/or relationship manager.

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	announced relief measures for payments under its mortgages or other types of consumer credit if the debtor is financially affected as a result of the COVID-19 outbreak. This relief measure may result in a postponement of payments for up to three months. The criteria to apply for such relief measure differ per bank. Further - the largest banks in The Netherlands (ABN AMRO Bank, Rabobank, ING Bank Volksbank and Triodos Bank) have decided to introduce relief measures in respect of loans granted to consumers. This measure may imply that such bank will offer a payment break to individuals who have or expect to have payment problems due to the COVID-19 outbreak. Consumers with a mortgage may apply for a three-month postponement of payment.	RMBS Unsecured consumer	
Poland	Following the recommendation of the Polish Bank Association (*Związek Banków Polskich*), the Polish banks declared, among other matters, to: (i) postpone repayment of principal and/or interest instalments for a period of up to 3 months, together with an automatic extension of the total loan repayment period by the same amount of time, subject to extension of the collateral validity period and (ii) roll over a financing for a period of up to 6 months for clients whose existing financing is due to revolve/renew in the upcoming months and who	All types	Right after the outbreak of COVID-19, the Polish Parliament adopted an "emergency" bill - the Law on Special Measures for COVID-19 and Crisis Prevention. The new law is now in force and provides for a number of solutions for the so-called shielding package for entrepreneurs to reduce the negative economic effects of the COVID-19 pandemic. The following other measures concerning banking and lending transactions are now in force or being implemented: • The Polish Financial Supervision Authority (*Komisja Nadzoru Finansowego*) has developed a Supervisory Stimulus Package for Security and Development to improve the resilience of the banking sector. This package introduces, among others, measures in the

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	was creditworthy at the end of 2019. No fees or commissions will be charged for such transactions. These measures will apply to housing loans, consumer loans, loans for private individuals and loans for corporate clients. Deferral of payments could also be applied to leasing and factoring transactions. The procedure of submitting applications for deferral of payments will be simplified, i.e. without the need to submit additional documents and/or certificates confirming in detail current financial and economic situation of a given borrower. However, the client will have to justify the need to postpone (suspend) the loan repayment with its financial situation caused by the COVID-19 pandemic. The banks and lease companies have already started to implement the above measures. Recently, the Polish government proposed a new regulation on forbearance measures to the Polish parliament. The new act is currently in the legislation process. Under this new regulation, consumers will have the right to suspend repayment of a loan for up to 3 months, without charging interest or other payments. The new regulation will apply to those who lost their jobs or another major		areas of provisions and classification of credit exposures to reduce the write-downs on banks' financial standing, measures in the area of capital buffers, liquidity requirements and also day-to-day supervision. • Amending loan agreements concluded with enterprises is subject to certain conditions. The banks will be able to amend the loan agreement if the loan was granted before March 8, 2020, if such amendment is justified by the assessment of the financial and economic situation of the borrower made by the bank not earlier than on September 30, 2019 and if it will not cause deterioration of the financial and economic situation of the borrower. • Certain procedural and court deadlines that have not yet been started are interrupted and those already running are suspended. This affects, among others, deadlines in the enforcement proceedings and deadlines on which granting legal protection in court is dependent. Such changes do not apply to cases identified by the new regulations as urgent (therefore a case by case advice would recommended for any specific in-court proceeding). • The Polish National Development Bank (*Bank Gospodarstwa Krajowego*) has already increased the maximum value of the de minimis guarantee from 60% to 80% of the loan amount and extend the maximum guarantee period for working capital repayment to 39 months. The Polish National Development Bank has also implemented a guarantee system from the Liquidity Guarantee Fund. Collateral can be granted up to 80% of the loan amount. The amount of the guaranteed loan is up to PLN 250 million. Guarantee period - up to 27 months. • Polish Development Fund Group (*Polski Fundusz Rozwoju*) has launched a new support programme that consists of components

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	source of income after March 13 2020. The suspension will occur automatically upon delivery of the appropriate request to the lender. The borrower will decide whether to suspend repayment for one, two or three months. In the case where the borrower has several loans of the same type with a given lender, the borrower will be entitled to take credit holidays only for one of these loans.		with a total value of PLN 100 billion. Aid for micro, small and medium-sized enterprises will be granted in the form of financial subsidies. The programme for large enterprises assumes that the main financial instruments for enterprise support will include liquidity financing, preferential financing and investment financing with the use of capital instruments on market principles and under state aid. The new legislation provides also, among others, for the following measures: <u>Tax</u> • possibility of retroactive settlement of tax losses in PIT and CIT • excluding the application of regulations in income taxes regarding the so-called bad debts • postponement of the deadline for payment of tax on building revenues • possibility to suspend tax audits, tax proceedings, customs and tax audits for the duration of the epidemic <u>Real Estate</u> • automatic rent suspension for tenants in shopping centres • lease term extension until June 30, 2020 • suspension of the landlord’s right to terminate the lease • extension of the deadline for payment of the perpetual usufruct fee until June 30, 2020 <u>Employment</u> • co-financing of salaries of employees on economic stoppage / with reduced working time

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
			• extension of the deadline for introducing Employee Capital Plans (*Pracownicze Plany Kapitałowe*) • additional childcare leave
Portugal	The Decree-Law no. 10-J/2020 of 26 March 2020, amended by the Law no. 8/2020 of 10 April 2020 ("Decree-Law"), establishes * (i) a suspension, for the period in which this measure is in force**, of partial repayments of loan capital or other loan instalments, and (ii) an extension, for a period identical to that of the suspension, for the payment of capital, rents and interest due in respect of loans reaching maturity during that period. Under this arrangement, contractually agreed payments of capital, rent, interest, commissions and other charges are also automatically extended in order to ensure that there are no charges arising from the implementation of the extension (other than those that may arise from the variability of the interest rate). The extension also applies to all related arrangements, such as any security granted in relation to the loan. In addition, recently, some banks*** have jointly announced payment holidays measures for residential loans and unsecured credit arrangements. The general principle is to provide the borrower with a grace period for capital/principal repayments on loans which are otherwise performing. The grace period will be 6 months in case of mortgage loans (until 30		The Decree-Law also provides for the following supportive measures in relation to credit arrangements: ➢ for the period during which this measure is in force**, a prohibition on total or partial revocation of agreed lines of credit and loans, in the amounts approved at the date of entry into force of the Decree-Law; and ➢ for a period equal to the period of application of this measure**, an extension* for all loans in force on the date of entry into force of the Decree-Law where payments of capital are due at the end of the loan term. The extension of the loan term applies to all related elements of the loan including interest, and any guarantees (including those provide by way of insurance) and to any related security. ** the extension of the payment term of principal, interest, commissions and other charges referred to in the protection measures shall not give rise to:* *(i)* *contractual breach;* *(ii)* *activation of early repayment clause;* (iii) *suspension of interest due during the extension period, which will be capitalised in the loan amount with reference to the time when they are due at the rate of the current contract; and* (iv) *ineffectiveness or termination of security granted by entities benefiting from the measures or by third parties, namely the effectiveness and validity of insurance, sureties and / or guarantees.*

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	September 2020) and 12 months for other consumer credit arrangements. Bank clients can opt for suspension of capital with or without suspension of interest. However, if they also choose to suspend interest, this will be capitalised and added to the outstanding amount. ** the extension of the payment term of principal, interest, commissions and other charges referred to in the protection measures shall not give rise to:* *(i) contractual breach;* *(ii) activation of early repayment clause;* (iii) *suspension of interest due during the extension period, which will be capitalised in the loan amount with reference to the time when they are due at the rate of the current contract; and* (iv) *ineffectiveness or termination of security granted by entities benefiting from the measures or by third parties, namely the effectiveness and validity of insurance, sureties and / or guarantees.* *** from 27 March 2020 to 30 September 2020.*		*** from 27 March 2020 to 30 September 2020.* **** participating banks: Banco BPI, S.A., Banco Comercial Português, S.A., Banco de Investimento Global, S.A., Banco Montepio, Banco Santander Totta, S.A., Caixa Central – Caixa Central de Crédito Agrícola Mútuo, CRL, Caixa Geral de Depósitos, S.A. and Novo Banco, S.A.*

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	**** participating banks: Banco BPI, S.A., Banco Comercial Português, S.A., Banco de Investimento Global, S.A., Banco Montepio, Banco Santander Totta, S.A., Caixa Central – Caixa Central de Crédito Agrícola Mútuo, CRL, Caixa Geral de Depósitos, S.A. and Novo Banco, S.A.*		
Spain	The Royal Decree-law 8/2020, of 17 March 2020, on urgent extraordinary measures to address the economic and social impact of COVID-19 (the "**RDL 8/2020**") and the Royal Decree-law 11/2020, of 31 March 2020, adopting urgent additional measures in the social and economic sphere to address COVID-19 (the "**RDL 11/2020**" and, jointly with RDL 8/2020, the "**RDLs**") provide for protection in favour of debtors in a "vulnerable situation" (including consumers, entrepreneurs and professionals) allowing them to suspend their payment obligations temporarily with respect to the following debts (the "**Legal Moratorium**") (subject to the fulfilment of certain requirements): • mortgage debt linked to (i) the main residence, (ii) properties used for the economic activity of entrepreneurs and professionals, or (iii) other properties that are rented out on which the debtor/owner has stopped receiving the	RMBS Unsecured consumers	The RDL 8/2020 states that, during the term of the state of alarm declared in Spain, a company that is facing an insolvency situation is no longer obliged to request an insolvency declaration from the relevant court. Likewise, any petition made by a creditor will not be processed by the court until 2 months have elapsed from the end of the state of alarm. Along the same lines, a moratorium will be available during the term of the state of alarm for debtors that have filed the pre-insolvency communication regulated under article 5 bis of the Spanish Insolvency Law. Additionally, the following measures have been implemented pursuant to the RDLs: - The Ministry of Economy, through the Spanish Official Credit Institute (ICO), shall make available a line of guarantees up to a maximum amount of €100,000 million with respect to the financing granted by financial institutions to companies and self-employed persons for the purposes of invoice management, working capital needs, maturity of financial or tax obligations or other liquidity needs. The coverage of the ICO guarantees is extended to promissory

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	rent; • loans or credit facilities not secured by mortgages. This "vulnerable situation" protection is further described in the RDLs which specify that the following requirements, among others, must be fulfilled: (i) the debtor has become unemployed or his/her earnings have decreased substantially where he/she is self-employed, (ii) the aggregate income of a family unit does not reach certain thresholds, and (iii) the mortgage instalment and its expenses have become too burdensome for the family unit. The moratorium (to be requested by the relevant debtor in accordance with the provisions of the RDLs) will be for a three-month period. During the term of the moratorium, the creditor shall not be entitled to demand payment of any principal instalment or interest or accelerate the financing. Likewise, no interest shall accrue. These measures will be applied under the same conditions to guarantors of the debtors. The guarantors and third party mortgagors that are in a "vulnerable situation" will be entitled to request the creditors to exhaust the main borrower's assets before claiming the debt from them, even where the benefit of excussio (*beneficio de excusión*) set forth in the Spanish		notes listed in the AIAF and MARFs markets and to the guarantees issued by CERSA (Compañía Española de Reafianzamiento, Sociedad Anónima). The Spanish Council of Ministers approved (i) on 24 March 2020 the first tranche of these guarantees up to an amount of €20 billion (subdivided in two sub-tranches of €10 billion, one for companies and the other one for SMEs and the self-employed); (ii) on 10 April 2020 the second tranche of these guarantees up to an amount of €20 billion (only applying to SMEs and the self-employed); (iii) on 5 May 2020 the third tranche of these guarantees up to an amount of €24,5 billion (including €4 billion to companies issuing debt in the Alternative Bond Market (*MARF*)); and (iv) on 19 May 2020 the fourth tranche of these guarantees up to an amount of €20 billion (only applying to SMEs and the self-employed). The self-employed and companies may request these guarantees, provided that they were not in default on 31 December 2019 or in the process of bankruptcy on 17 March 2020 These guarantees will secure up to 80% of new loans and renewals of transactions requested by the self-employed and SMEs. For other companies, the guarantee will cover up to 70% of the new loans and up to 60% of the renewals. The maximum term of the ICO guarantee issued will be five years. The financial institutions reaching an agreement with the ICO

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	Civil Code has been previously waived by the relevant guarantor or third party mortgagor. Additionally, the Royal Decree-law 19/2020, of 26 May, adopting, among others, complementary economic measures (the "**RDL 19/2020**"), regulates the industry-wide master agreements that may be promoted by representative associations of financial institutions on the contractual moratorium of financing transactions with customers affected by COVID-19 crisis (the "**Contractual Moratorium**"). The Contractual Moratorium may apply to borrowers that are not in a vulnerable situation, These industry-wide master agreements shall be published in the website of the Bank of Spain. The RDL 19/2020 sets forth that the Contractual Moratorium can include a redistribution of the instalments to be paid by the borrower or an extension of the term of the financing, without (i) amending the interest rate; (ii) increasing the applicable fees (save for limited exceptions); (iii) requesting additional guarantees; or (iv) selling linked or combined products. The effects of this Contractual Moratorium should apply without prejudice to the Legal Moratorium. The registration of the Contractual Moratorium		undertake to maintain, at least until 30 September 2020 the limits of the revolving credit lines granted to all clients. - The limit of the Spanish Official Credit Institute's (ICO) net indebtedness has been increased by €10,000 million with the aim of facilitating additional liquidity to companies, especially to SMEs and self-employed persons. - A line of insurance coverage of up to €2,000 million financed by the Spanish Internalization Risk Reserve Fund (*Fondo de Reserva de los Riesgos de la Internacionalización*) has been authorised. The eligible operating loans shall be those related to new financing needs of the relevant exporting companies. Therefore, these loans cannot be linked to needs existing prior to the beginning of this crisis. This line will be implemented in two instalments of €1,000 million each and will be funded by the Spanish Company for Export Credit Insurance (CESCE) in the name and on behalf of the Spanish State for a period of 6 months since the entry into force of the RDL 8/2020.

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	(only when it must be registered) with the relevant Register will have full effects against registered intermediate creditors, even if they do not give their consent. It should be noted that these Contractual Moratoria will be exempted from some legal obligations and formalities. For instance, the relevant amendment agreement may be unilaterally formalized by the financial institution subject to certain requirements.		
United Kingdom	Initiatives in the UK can be categorised into three types: government announcements, regulatory guidance and industry initiatives. Collectively, these initiatives result in payment holidays being made available in the UK for residential mortgage payments (both for households and residential buy-to-let landlords) and greater flexibility being provided for consumers with persistent credit card debt, though currently none of these arrangements are provided for in UK legislation.	RMBS Unsecured consumer SME	On 11 March 2020, HM Treasury and HMRC announced various measures to support businesses by reducing costs or bridging cash-flow problems including: • deferring VAT and Income Tax payments; • a Statutory Sick Pay relief package for SMEs - the Coronavirus Bill and the related impact assessment include more information on the arrangements for this rebate; • a 12-month business rates holiday for all retail, hospitality, leisure and nursery businesses in England; • small business grant funding of £10,000 (there is also a grant scheme for retail, hospitality and leisure businesses); • extension of the HMRC Time To Pay Scheme; • a Coronavirus Business Interruption Loan Scheme (CBILS) offering loans and overdrafts of up to £5 million for up to 6 years
	1. Government Announcements Neither the Finance Bill 2020 nor the Coronavirus Act 2020 (which includes emergency measures relating to the Coronavirus) provide a legislative basis for payment holidays in the UK, though a bill could be introduced to Parliament in due course. The Coronavirus Act(sections 81 and 82 and		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	Schedule 29) does include provision for a restrictionon evictions and additional protection for renters. See our alerts on this here and here. On 11 March 2020 the Chancellor announced in the Budget 2020, that the UK Government welcomed the statement by UK Finance on 5 March 2020 which announced that banks, building societies and credit card providers will offer support to consumers, including offering or increasing an overdraft or allowing repayment relief for loan or mortgage repayments. The UK Government also announced that those who have benefited from a government backed Help to Buy equity loan will be offered interest payment holidays if they are struggling to pay due to coronavirus. On 22 May 2020, HM Treasury announced that payment holidays for mortgage loans could be extended by a further three months or payments could be made at a reduced level. For further details, please see below under "Regulatory Guidance".	RMBS Unsecured consumer RMBS	for SMEs through the British Business Bank (BBB). The UK Government will also make a Business Interruption Payment to cover the first 12 months of interest payments and any lender-levied fees, so smaller businesses will benefit from no upfront costs and lower initial repayments. The CBILS launched on 23 March 2020. There are now many accredited lenders able to offer the CBILS, including all the major banks. See the BBB's dedicated CBILS webpage for more information; • support for larger firms through the COVID-19 Corporate Financing Facility (CCFF). Under the CCFF, the Bank of England buys short term debt from larger companies to support them if affected by short-term funding issues. In May 2020, HM Treasury announced revisions to the terms of the CCFF, which will close to new drawings in March 2021. Businesses that wish to draw from the CCFF for a term extending beyond 19 May 2021 will need to provide a letter to HM Treasury that commits to restraint on the payment of dividends and on senior pay during the period in which their commercial paper is outstanding. In addition, in order to increase transparency, HM Treasury and the Bank of England now publish the names of businesses that have drawings under the CCFF, including the amounts borrowed. The Bank of England has also published an updated consolidated market notice, including a revised section on what constitutes "eligible securities" under the CCFF. For full details of the terms of the CCFF, please see our client note on the CCFF. Further details of these measures, among others, can be found here. In March 2020, the Bank of England published details of its Term Funding Scheme with additional incentive for SMEs. The TFSME opened to drawings earlier than originally anticipated on 15 April 2020. This TFSME allows eligible banks and building societies to access four-year
	2. Regulatory Guidance: On 20 March 2020, the FCA published guidance for small business lenders and guidance for mortgage providers. Updated mortgage	SME, RMBS, Unsecured	

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	guidance entered into force on 4 June 2020. On 2 April 2020, the FCA proposed temporary financial relief for customers impacted by coronavirus which entered into force on 9 April 2020. On 17 April 2020 the FCA proposed help for motor finance and high cost credit customers which entered into force on 27 April 2020. The **FCA Mortgage Guidance** for firms follows on from the UK Finance initiative for mortgage payment holidays (see "*Industry Initiatives*" below). The guidance provides that: • where a customer indicates they may potentially experience payment difficulties and wishes to receive a payment holiday, a firm should grant a three month payment holiday unless it can demonstrate it is reasonable and in the customer's best interest to do otherwise; • a firm may ask a customer if they would like a payment holiday where the customer provides information suggesting they might face payment difficulties. • a firm may decide to put in place an option other than a three-month payment holiday, if it is appropriate to do so in the individual circumstances of	Consumer RMBS	funding at rates very close to Bank Rate. The scheme is designed to incentivise eligible participants to provide credit to businesses and households to bridge through the current period of economic disruption caused by the outbreak of Covid-19. The scheme includes additional incentives to provide credit to SMEs. In May 2020, the Bank of England announced changes to the TFSME in order to support the Bounce Back Loan Scheme (see below for more information on the Bounce Back Loan Scheme). On 24 March 2020, the Bank of England announced it was activating the Contingent Term Repo Facility (CTRF), allowing participants to borrow central bank reserves (cash) in exchange for other, less liquid assets (collateral). The CTRF operations were initially only supposed to run on 26 March 2020 and 2 April 2020, for a term of 3 months, allowing participants to use the CTRF as a way to bridge beyond the point at which drawings can be made from the Term Funding Scheme with additional incentives for SMEs (TFSME) – helping to support lending to the real economy as quickly as possible. On 30 March 2020, the Bank of England announced an extension of the CTRF 3-month term, providing that CTRF operations will continue to run weekly until 30 April 2020. In May 2020, the Bank of England announced that it would discontinue 3-month CTRF operations at the end of May 2020. The final operation took place on 28 May 2020. The existing 1-month term CTRF operations will continue to operate on a weekly basis at least through June 2020, with operations currently scheduled to end on 26 June 2020. The Bank's regular liquidity insurance facilities will continue to operate including the weekly 6-month Indexed Long-Term Repo (ILTR) and the on-demand Discount Window Facility (DWF). The indicative schedule for the Bank of England's market operations can be found here On 17 March 2020, the Chancellor of the Exchequer announced additional support for businesses including unlimited loans and guarantees to support firms and help them manage cash-flows. An initial

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	the case and the firm reasonably considers it as being in the best interests of the customer. This could include a payment holiday of fewer than three months if, for example, the expected loss of income is temporary, or a reduced monthly payment if, for example, the loss of income is partial;; • the guidance states that firms may provide more favourable forms of assistance to the customer (e.g. reducing or waiving interest); • the guidance applies irrespective of whether a customer is in a payment shortfall situation; • customers are not to be charged fees for the grant of a payment holiday (but this does not include accrual of interest of sums owed); • a firm should ensure that the manner of recovery of any sums covered by a payment holiday and any increase in the total amount payable under the mortgage contract once the payment holiday has ended is compatible with Principle 6 of the FCA's Principles for Businesses. A firm should not		£330 billion of guarantees will be made available. Other developments include: • On 2 April 2020, the Bank of England voted to increase its holdings of UK government bonds and sterling non-financial investment-grade corporate bonds by £200 billion to a total of £645 billion, financed by the issuance of central bank reserves through the Corporate Bond Purchase Scheme (CBPS). The CBPSlowers the yields on corporate bonds, thereby reducing the cost of borrowing for companies. On 1 May 2020, the Bank of England published an updated and consolidated market notice outlining the details of the CBPS. On 4 June 2020, the Bank of England updated the list of eligible securities for the CBPS to include additional bonds with 3 months to maturity par call features. • On 16 April 2020, the UK Government announced final details of the Coronavirus Large Business Interruption Loan Scheme (CLBILS), which launched on 20 April 2020. CLBILS provides finance to mid-sized and larger UK businesses with turnover above £45m (the upper limit for the existing smaller-business focused CBILS) who are suffering disruption to their cashflow due to lost or deferred revenues during the COVID-19 outbreak. Following further changes to the scheme, firms can now apply for government-backed support of up to £200m. From 26 May 2020, loans of over £50m are subject to restrictions on dividend payments, senior pay and share buy-backs during the loan period, including a ban on dividend payments and cash bonuses, except where they were previously agreed. The CLBILS supports term loans, revolving credit facilities (including overdrafts), invoice finance and asset finance facilities. Finance terms are from three months to three years and the UK

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	capitalise these amounts without having given the customer information on the impact of doing so on their monthly payments or the mortgage term, and the option to choose an alternative means of repaying the amount (eg a lump sum). The information given should be clear and provided in good time before the capitalisation takes place; • there must not be a negative impact on a customer's credit score arising from a payment holiday; and • firms are not to commence or continue repossession proceedings against customers at this time unless the customer has agreed it is in their best interests. The guidance only applies where there has been a change in financial circumstances of customers of home finance providers arising from the impact of COVID-19. Under the updated guidance which entered into force on 4 June 2020: • customers that have not yet had a payment holiday and are experiencing		Government will provide a partial guarantee of 80% of the outstanding facility balance. The scheme is available through a series of accredited lenders, listed on the BBB's website. Lenders who are already accredited under CLBILS will have to go through a further process to become accredited to lend loans of over £50m. Lenders wishing to lend CLBILS facilities of greater than £50 million to any borrower or borrower group need to notify the BBB in advance of agreeing to do so. • On 20 April 2020, the UK Government announced a Future Fund scheme to assist innovative companies which are facing financing difficulties due to the COVID-19 outbreak, and has published accompanying Headline Terms. The scheme will issue convertible loans from £125,000 to £5 million to innovative companies currently experiencing financing difficulties due to the pandemic. £250,000,000 will initially be available for the scheme. The scheme is aimed at businesses that usually make use of equity investment and are unable to access the CBILS. The scheme launched on 20 May 2020, and initially will be open until the end of September 2020. • On 27 April 2020, the FCA and the PRA published statements setting out their approach to the regulation of firms relating to, in the case of the FCA, the CBILS and the Bounce Back Loan Scheme (BBLS) (see further below) in light of changes made to the CBILS and in the case of the PRA statement in response to changes to the CBILS (including the launch of the BBLS) and the CLBILS. The FCA statement was updated on 4 May 2020 to reflect the formal launch of the BBLS. • On 4 May 2020, the government launched the Bounce Back

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	financial difficulty as a result of COVID-19 will be able to request one until 31 October 2020; • at the end of a payment holiday, firms should contact their customers to find out if they can resume payments and, if they can, agree a plan on how the missed payments will be repaid; • lenders should continue to support customers who have already had a payment holiday where they need further help, with one option being a further three-month payment holiday; • the current ban on repossessions of homes will be continued to 31 October 2020, allowing people to comply with the government's policy to self-isolate if they need to; and • firms should not report a worsening status on the customer's credit file due to any new or continuing payment deferral period. The updated guidance expires on 31 October 2020 unless it is renewed or updated by then. The FCA will keep the operation of the guidance under review, having regard to the evolving		Loan Scheme (BBLS). The BBLS was introduced after the launch of the CBILS to accelerate lending to micro-businesses. It's available to most UK-based businesses, regardless of turnover, and is designed to allow "immediate" release of funds and to deal with issues created by Consumer Credit Act 1974 requirements under the CBILS. The scheme provides loans of £2,000 - £50,000 with a 100% government-backed guarantee. In order to be eligible a business must, in summary: be UK-based in its business activity; self-certify that it has been adversely impacted by COVID-19; and not have been classed as a "business in difficulty" on 31 December 2019, subject to certain de minimis criteria. For more on the BBLS, see the dedicated section of the BBB's website.

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	COVID-19 situation, and will bring forward further measures if necessary. The FCA are updating their guidance for consumer credit products (see below) separately. There is also specific FCA guidance for consumers on mortgage payment holidays and FCA guidance for firms to use with consumers on dealing with financial difficulties during coronavirus, as well as an FCA feedback statement on the updated mortgage guidance. **FCA Guidance to Small Business Lenders participating in the Coronavirus Business Interruption Loan Scheme** - and the UK Government website provides that: • the scheme supports lending to SMEs impacted by the coronavirus of up to £5m for up to six years. Loans of up to £25,000 to sole traders and unincorporated enterprises under the scheme can also fall within the scope of FCA regulation; • the SME's business must be UK based, with turnover of no more than £45 million per year; • the exceptional financial pressure faced by a customer does not mean that a firm is prevented by the relevant rule in	SME	

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	the Consumer Credit sourcebook (CONC) from making a loan; • lenders must take account of appropriate information including historical trading figures and future projections when carrying out a creditworthiness assessment under CONC; • if forecasted figures do not materialise, lenders must consider deferring or limiting repayments until it does. The publication of the FCA guidance follows the release of a statement on 17 March 2020 in which the FCA announced that firms should use the flexibility in the FCA rules to support consumers and customers (e.g. by providing flexibility on mortgage and loan payments) and should show greater flexibility to consumers with persistent credit card debt by extending the period before a card is suspended until 1 October 2020. This is further supported by the UK Government guidance on Support for those affected by COVID-19. **FCA Temporary Financial Relief for Customers Impacted by Coronavirus** provides that: • the FCA expects firms to offer a	RMBS Unsecured consumer Unsecured consumer	

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	temporary payment freeze on loans, credit cards, store cards and catalogue credit for up to three months, for consumers negatively impacted by COVID-19; • customers who are negatively impacted by COVID-19 and already have an arranged overdraft on their main personal current account, up to £500 will be charged at zero interest for up to three months. Customers without an overdraft on their main personal current account should also be able to request this facility; • firms are required to make sure that all overdraft customers are no worse off on price when compared to the prices they were charged before the recent overdraft changes came into force; • consumers using any of these temporary measures should not have their credit file affected because of this; • with the exception of the £500 overdraft proposal, firms would be entitled to charge a reasonable rate of interest where a customer requests a temporary payment freeze. In the event that a		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	customer requires full forbearance that interest should be waived; and • the above does not apply to high-cost short term credit agreements, buy now pay later agreements, or hire purchase agreements (including motor finance), peer to peer agreement, pawnbroking agreement, and premium finance. The guidance does not apply to business loans. There is specific guidance on credit cards and revolving credit, arranged overdrafts, and personal loans. There is no expectation under this guidance that firms make enquiries with each customer to determine the circumstances surrounding a request for a payment deferral, or whether this is not in the customer's interests. Firms should make clear in their communications, including on their websites, that payment deferrals are available as set out in the circumstances described above. In addition, if, during an interaction between the firm and the customer, the customer provides information suggesting that the customer may be experiencing or could reasonably expect to experience temporary payment difficulties as a result of circumstances relating to coronavirus, the firm should ask whether the customer wishes it to consider		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	granting a payment deferral. In response to the consultation, the guidance now includes clarification on which products are in scope. In particular, the FCA are confirming that the following products are covered: guarantor loans, logbook loans, home collected credit, a loan issued by Community Development Finance Institution and some loans issued by credit unions, but only where these are regulated. These measures won't replace normal forbearance rules where these would be more suitable for a consumer in serious and immediate financial difficulty. The package entered into force on 9 April 2020 and the full range of measures has applied from 14 April 2020. As at 5 June 2020, the FCA are updating the guidance and publication of the draft proposals is awaited.		
	FCA Help for motor finance and high cost credit customers provides that: • the FCA expects firms to provide a 3-month payment freeze to motor finance customers who are having temporary difficulties meeting finance or leasing payments due to coronavirus. If customers are experiencing temporary payment difficulties due to coronavirus	Unsecured consumer	

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	and need use of the vehicle, firms should not take steps to end the agreement or repossess the vehicle; • firms should not change motor finance customer contracts in a way that is unfair. For example, firms should not try to use temporary depreciation of car prices caused by the coronavirus situation to recalculate Personal Contract Purchase (PCP) balloon payments at the end of the term. The FCA will expect firms to act fairly where terms are adjusted; • where a motor finance customer wishes to keep their vehicle at the end of their PCP agreement, but does not have the cash to cover the balloon payment due to coronavirus-related financial difficulties, firms should work with the customer to find an appropriate solution; • the FCA would expect high-cost short-term credit (payday lending) firms to provide a 1 month interest-free payment freeze to customers facing payment difficulties due to the coronavirus pandemic. This shorter period reflects both the much shorter length of most loans and, given interest rates tend to		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	be higher than for other high cost credit products, prevents firms from accruing additional interest during the freeze period. After the end of the freeze, the firm should allow the consumer to pay the deferred payment in an affordable way – whether for example, by 1 single payment after the end of the term or by a number of smaller instalments; • firms that enter into rent-to-own, buy-now-pay-later, or pawnbroking agreements will be expected to provide a 3-month payment freeze to customers facing payment difficulties due to coronavirus and the FCA also sets out some further steps that such firms should take in relation to their specific products; • with the exception of high-cost short-term credit, firms would be entitled to charge a reasonable rate of interest where a customer requests a temporary payment freeze, although firms and consumers should consider the amount of interest on outstanding balances which may build up, and balance this against the need for immediate temporary support. In the event that a		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	customer requires full forbearance that interest should be waived; and • firms are not prevented from providing more favourable forms of assistance to any customer, including a longer payment freeze if appropriate. There is specific temporary guidance on motor finance, rent-to-own, and high-cost short-term credit. These measures entered into force on 27 April 2020. Customers should be able to request a payment deferral at any point after this date for a period of 3 months. On 4 June 2020, the PRA published a Dear CEO letter on IFRS 9 and capital requirements in the context of COVID-19. The letter updates the PRA's guidance set out in a Dear CEO letter of 26 March 2020 and its high-level statement of 22 May 2020 to give further guidance on the treatment of payment deferrals, including exits from initial deferrals following the FCA's updated mortgage guidance. The PRA's detailed guidance is set out in the annex to the letter. The PRA will review the guidance in due course in light of future developments. In our view the FCA Mortgage Guidance, the FCA Guidance for Temporary Financial Relief for Customers Impacted by Coronavirus and the		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	FCA Guidance for motor finance and high cost credit customers would also apply to entities who have acquired such loans from the original lender (eg, in portfolio sale, forward flows or securitisations).		
	3. Industry Initiatives The banking and finance industry have published various announcements regarding payment holidays through UK Finance. These announcements include the following initiatives: • On 5 March 2020, UK Finance published a statement announcing that banks, building societies and credit card providers were ready and able to provide support to consumers and businesses in light of the impact of COVID-19. Measures included offering or increasing overdrafts or allowing repayment relief on loans or mortgages. • On 18 March 2020, UK Finance announced additional support for homeowners and residential landlords provided by banks and lenders including: (i) extending the option of a payment holiday of up to three months to residential buy-to-let landlords who	RMBS Unsecured consumer SME	

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	have tenants who are experiencing issues with their finances, as either a direct or indirect result of Coronavirus; (ii) a three month moratorium on residential and buy-to-let possession action to start from 19 March 2020. The conditions for such payment holidays are published on UK Finance's website and include a requirement to be up to date on mortgage payments. • On 21 March 2020, UK Finance published a statement confirming that the banking and finance industry remains committed to supporting all customers who are impacted directly or indirectly by COVID-19. Banks have announced a series of measures already to help (outlined above) and the industry placed adverts in national newspapers to highlight the support available. • On 23 March 2020, UK banks and lenders issued a statement through UK Finance highlighting their commitment and capacity "*to support viable businesses with their cashflow and investment needs*" and consider the Coronavirus Business Interruption Loan Scheme to be an important additional		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	solution to support SMEs through the cash-flow pressures resulting from the impact of COVID-19. • On 9 April 2020, UK Finance issued a statement welcoming the package of targeted temporary measures confirmed by the FCA for overdrafts, credit cards and instalment loans. • On 29 May 2020, the banking and finance industry issued a statement through UK Finance confirming its continued support for commercial landlord customers as part of its ongoing commitment to help business customers. In the statement lenders recognise that, with the June/July rent quarter soon approaching, commercial landlords and their tenants may have concerns about their ability to make their payments. Banks and finance providers are committed to supporting viable businesses and are engaging with their landlord customers ahead of the next quarter day. The flexible support available includes providing capital payment holidays and amending current facilities. On 2 June 2020, following publication of the FCA's update mortgage guidance (see above under 'Regulatory guidance'), lenders issued a		

Country	Payment Moratoria Measures	Applicable ABS Transactions	Other Measures
	statement through UK Finance committing to helping those mortgage customers that need assistance during the COVID-19 pandemic, including through the extension of mortgage payment holidays if appropriate. In the same statement, lenders also committed to continue the moratorium on involuntary repossession for residential and buy-to-let customers to 31 October 2020.		

KEY CONTACTS: HOGAN LOVELLS

UNITED KINGDOM

Julian Craughan
Partner, London
T +44 20 7296 5814
julian.craughan@hoganlovells.com

James Black
Partner, London
T +44 20 7296 5898
james.black@hoganlovells.com

Jonathan Chertkow
Partner, London
T +44 20 7296 2191
jonathan.chertkow@hoganlovells.com

Emily Reid
Partner, London
T +44 20 7296 5362
emily.reid@hoganlovells.com

Roger Tym
Partner, London
T +44 20 7296 2470
roger.tym@hoganlovells.com

Julie Patient
Counsel, London
T +44 20 7296 5790
julie.patient@hoganlovells.com

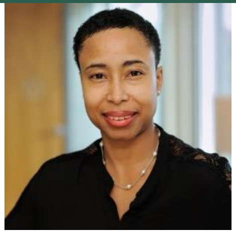
Rachel Pleming
Counsel Knowledge Lawyer, London
T +44 20 7296 5119
rachel.pleming@hoganlovells.com

Virginia Montgomery
Senior Knowledge Lawyer, London
T +44 20 7296 2001
virigina.montgomery@hoganlovells.com

FRANCE

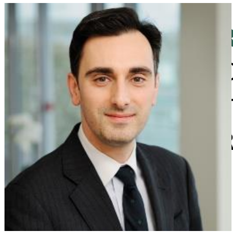
Sharon Lewis
Partner, Paris/London
T +33 (1) 5367 4704 (Paris)
+44 20 7296 2474 (London)
sharon.lewis@hoganlovells.com

Vincent Fidelle
Partner, Paris
T +33 1 53 67 18 91
vincent.fidelle@hoganlovells.com



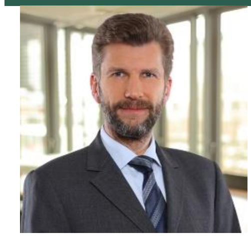
Katia Merlini
Partner, Paris
T +33 1 53 67 38 38
katia.merlini@hoganlovells.com

Laura Asbati
Counsel, Paris
T +33 1 53 67 47 56
laura.asbati@hoganlovells.com



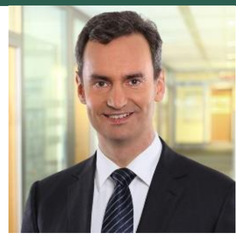
Reza Mulligan
Counsel, Paris
T +33 1 53 67 48 26
reza.mulligan@hoganlovells.com

GERMANY



Sven Brandt
Partner, Frankfurt
T +49 69 962 36 200
sven.brandt@hoganlovells.com

Julian Fischer
Partner, Frankfurt
T +49 69 962 36 206
julian.fischer@hoganlovells.com



Dietmar W. Helms
Partner, Frankfurt
T +49 69 962 36 260
dietmar.helms@hoganlovells.com

ITALY

Corrado Fiscale
Partner, Milan
T +39 02 720 2529
corrado.fiscale@hoganlovells.com

Federico Del Monte
Partner, Milan
T +39 02 720 2521
federico.delmonte@hoganlovells.com

Giulia Arenaccio
Counsel, Rome
T +39 06 6758 23 1
giulia.arenaccio@hoganlovells.com

Annalisa Feliciani
Counsel, Rome
T +39 06 6758 23 1
Annalisa.feliciani@hoganlovells.com

LUXEMBOURG

Pierre Reuter
Partner, Luxembourg
T +352 26 4 26 201
pierre.reuter@hoganlovells.com

Valerie Laskowski
Senior Associate, Luxembourg
T +352 26 4 26 134
valerie.laskowski@hoganlovells.com

Marie-Roxane Karydi
Associate, Luxembourg
T +352 26 42 61 41
Marie-Roxane.Karydi@hoganlovells.com

Poland

Piotr Zawislak
Partner, Warsaw
T +48 22 529 29 00
Piotr.zawislak@hoganlovells.com

THE NETHERLANDS

Robert Masman
Partner, Amsterdam
T +31 20 55 33 747
robert.masman@hoganlovells.com

Jan-Willem Boer
Associate, Amsterdam
T +31 20 55 33 758
jan-willem.boer@hoganlovells.com

SPAIN

José Luis Vázquez
Partner, Madrid
T +34 91 349 81 58
joseluis.vazquez@hoganlovells.com

Carlos Meijide
Associate, Madrid
T +34 91 349 81 57
carlos.meijide@hoganlovells.com

ARTHUR COX		
Dublin, Republic of Ireland		
Aiden Small	Partner	Aiden.small@arthurcox.com
Niamh Nic Uileagóid	Associate	Niamh.NicUileagoid@arthurcox.com
Maedhbh Clancy	Counsel	Maedhbh.Clancy@arthurcox.com
Sinéad Cantillon	Professional Support	Sinead.Cantillon@arthurcox.com
DELOITTE LEGAL		
Brussels, Belgium		
Werner Van Lembergen	Laga Banking and Finance – Head of Practice	wvanlembergen@deloitte.com
Jean-Philippe de Vinck	Senior Associate, Laga Banking and Finance Team	jdevinck@deloitte.com
BERNITSAS LAW		
Athens, Greece		
Athanasia Tsene	Partner	atsene@bernitsaslaw.com
Fotodotis Malamas	Counsel	fmalamas@bernitsaslaw.com
Lambros Belessis	Partner	lbelessis@bernitsaslaw.com
Dimitris Roussis	Partner	droussis@bernitsaslaw.com

Christos Paraskevopoulos	Counsel	cparaskevopoulos@bernitsaslaw.com
Katia Papantonopoulou	Counsel	kpapantonopoulou@bernitsaslaw.com

Partos & Noblet in co-operation with Hogan Lovells International LLP

Budapest, Hungary

Dr László Partos	Partner	laszlo.partos@hoganlovells.co.hu

MORAIS LEITAO

Lisbon, Portugal

Luis Branco	Partner	lbranco@mlgts.pt

Alicante
Amsterdam
Baltimore
Beijing
Birmingham
Boston
Brussels
Budapest
Colorado Springs
Denver
Dubai
Dusseldorf
Frankfurt
Hamburg
Hanoi
Ho Chi Minh City
Hong Kong
Houston
Jakarta
Johannesburg
London
Los Angeles
Louisville
Luxembourg
Madrid
Mexico City
Miami
Milan
Minneapolis
Monterrey
Moscow
Munich
New York
Northern Virginia
Paris
Perth
Philadelphia
Rio de Janeiro
Rome
San Francisco
São Paulo
Shanghai
Shanghai FTZ
Silicon Valley
Singapore
Sydney
Tokyo
Ulaanbaatar
Warsaw
Washington, D.C.
Zagreb

Our offices

Associated offices

Hogan Lovells

www.hoganlovells.com