FitchRatings

Structured Finance
Unsecured Consumer Loans
Spain

Santander Consumo 8, FT

EMEA ABS Compare Tool

Inside This Report | Page

Capital Structure

Class	Expected rating	Outlook	Amount (EURm)	CE (%)[a]	Interest rate (%)	Legal final maturity
A	AAsf	Stable	1,267.5	17.0	3m Euribor + 0.77	January 2040
B	A+sf	Stable	52.5	13.5	3m Euribor + 1.20	January 2040
C	BBB+sf	Stable	60.0	9.5	3m Euribor + 1.50	January 2040
D	BB+sf	Stable	63.8	5.25	3m Euribor + 2.75	January 2040
E	B+sf	Stable	56.2	1.5	3m Euribor + 4.50	January 2040
F	NRsf		22.5		3m Euribor + 5.24	January 2040
Total			**1,522.5**			

[a] Credit enhancement (CE) consists of structural subordination and a reserve fund. In addition, the structure benefits from an initial excess spread of about 3.5% a year.
3m: three-month.
Source: Fitch Ratings

Santander Consumo 8, FT is a securitisation of a EUR1,500 million revolving portfolio of fully amortising general-purpose consumer loans originated by Banco Santander S.A. (Santander, A/Stable/F1) for Spanish residents. Around 86% of the portfolio balance is linked to pre-approved loans underwritten for existing Santander customers.

Closing occurred on 28 May 2025. The transfer of the portfolio to the issuer occurred on 22 May 2025. The ratings assigned above are based on the portfolio information as of March 2025, provided by the originator.

Ratings are not a recommendation to buy, sell or hold any security. The prospectus and other material should be reviewed prior to any purchase.

Key Rating Drivers

Asset Assumptions Reflect Pool Profile: Fitch Ratings set base case lifetime default and recovery rates of 4.25% and 25.0% for the portfolio, reflecting the historical data provided by Santander, Spain's economic outlook, pool features and the originator's underwriting and servicing strategies. For the 'AA' rating case, the lifetime default and recovery rates are 17% and 15%, respectively.

Short Revolving Period: The transaction has an 11-month revolving period during which new receivables can be purchased by the SPV. Fitch considers any credit risk stemming from the revolving period as sufficiently captured by the default multiples (increased to 5.0x from 4.75x in Santander Consumo 7, which closed in late 2024 and securitised a static portfolio). Fitch expects around 25% of the pool balance to be replenished during the revolving period, assuming an annualised prepayment rate of 10%, which Fitch set on the basis of comparable Spanish ABS.

Fitch has not assumed a stressed composition of the portfolio towards the limits permitted by the transaction covenants (as for example the term to maturity limit) considering the short duration of the revolving period, stressing only under its cash flow analysis the weighted average (WA) interest rate limit of the pool. See the Revolving Period section of this report.

Pro Rata Amortisation: After the revolving period, the class A to E notes will be repaid pro-rata unless a sequential amortisation event occurs. These are primarily linked to performance triggers like the principal deficiency ledger (PDL) and cumulative defaults exceeding certain thresholds. Fitch views these triggers as robust enough to prevent the pro rata mechanism from continuing on early signs of performance deterioration. We believe the tail risk is mitigated by the mandatory switch to sequential amortisation (the pool factor trigger).

Interest Rate Hedge: An interest rate swap hedges the risk arising from mismatch between the portfolio, which pays a fixed interest rate for life and the floating rate securitisation notes. The swap notional is the outstanding balance of the non-defaulted receivables.

Representations, Warranties and Enforcement Mechanisms

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Highlights

Effect	Highlight
+	**Solid Excess Spread:** The structure benefits from an initial excess spread of around 3.5% a year after deducting senior fees, swap costs and the WA cost of liabilities.
+	**Liquidity Protection Mitigates Servicing Disruption:** Payment interruption risk, for example in the event of servicer disruption, is mitigated by a dedicated cash reserve, which covers senior costs, net swap payments and interest on the class A to E notes for more than three months, providing sufficient time for a new servicer to resume collections. While there is no back-up servicer due to be appointed at the closing date, the management company acts as back-up servicer facilitator.
-	**Counterparty Arrangements Could Cap Ratings:** The maximum achievable rating of the notes is 'AA+sf', according to Fitch's counterparty criteria. The minimum eligibility rating thresholds defined for the transaction account bank (TAB) of 'A-' or 'F1' are insufficient to support 'AAAsf' ratings.
Neutral	**High Share of Pre-Approved Loans:** Around 86% of the loans in the portfolio are pre-approved by Santander, underwritten for existing customers mainly based on the borrower's credit profile and transaction record with the lender. Although these loans in Spain often perform worse than other type of loans, Fitch considers the characteristics and risk profiles of the pre-approved loans to be broadly similar to standard loans, based on the data presented by Santander.
Neutral	**Portfolio Broadly Comparable to Prior ABS:** Fitch views Santander Consumo 8's portfolio as broadly comparable to the prior Santander Consumo 7 pool, benefiting from positive selection as it does not include any loans with regulatory probability of default (PD) higher than 6% (as in Santander Consumo 7).
+	**Servicer Replacement Fee Reserve:** The transaction features a dedicated reserve to mitigate the servicer replacement costs. The rating trigger level for this reserve's funding has been set at 'A-', which is above the minimum secondary risk ratings of our counterparty rating criteria (established at BBB or F2). As a result of this feature, Fitch modelled only its criteria annual floor senior fee amount of EUR250,000 (contractual fees are below the EUR250,000 floor).

Source: Fitch Ratings

Key Rating Drivers (Negative/Positive/Neutral)

Rating impact	Key rating driver
Neutral	Asset assumptions reflect pool profile
Neutral	Short revolving period
Neutral	Pro rata amortisation
Positive	Interest rate hedge

Source: Fitch Ratings

Applicable Criteria

Consumer ABS Rating Criteria (October 2024)

Global Structured Finance Rating Criteria (November 2024)

Structured Finance and Covered Bonds Counterparty Rating Criteria (November 2023)

Structured Finance and Covered Bonds Counterparty Rating Criteria – Derivative Addendum (November 2023)

Structured Finance and Covered Bonds Interest Rate Stresses Rating Criteria (October 2024)

Structured Finance and Covered Bonds Country Risk Rating Criteria (June 2024)

Key Transaction Parties

Role	Name	Fitch rating
Issuer	Santander Consumo 8, F.T.	Not rated
Originator/servicer/collection account bank (CAB), TAB, hedge provider	Banco Santander, S.A.	IDR:A/Stable/F1 DR: A+/F1 DCR: A+(dcr)
Trustee/management company/ Back-up servicer facilitator	Santander de Titulización, S.G.F.T, S.A.	Not rated

IDR: Issuer Default Rating. DCR: Derivative Counterparty Rating. DR: Deposit rating.
Source: Fitch Ratings, transaction documents

Transaction Comparison

The most significant features of Santander Consumo 8, FT compared to other Iberian consumer loan securitisations, are the low seasoning of its portfolio, and the high share of pre-approved loans. All the information within the table below refers to the analysis at the closing date of each transaction.

	Santander Consumo 8	Santander Consumo 7	Santander Consumo 5	BBVA Consumer 2024-1, FT
Closing	May 2025	November 2024	July 2023	May 2024
Country of assets	Spain	Spain	Spain	Spain
Originator	Santander	Santander	Santander	BBVA
Issuance (EURm)	1,522.5	1,215.6	816.0	807.1
Class A				

	Santander Consumo 8	Santander Consumo 7	Santander Consumo 5	BBVA Consumer 2024-1, FT
Rating	AAsf	AA+sf	AA+sf	AA-sf
CE (%)	17.0	14.8	22.0	16.6
Class B				
Rating	A+sf	A+sf	A+sf	A-sf
CE (%)	13.5	11.05	16.6	12.6
Portfolio summary				
Revolving period (months)	11	No, static	5	No, static
Pro rata amortisation since closing?	Yes	Yes	Yes	Yes
Portfolio balance (EURm)	1,500	1,200.0	800.0	800.0
Number of loans	162,591	105,980	134,011	107,351
Average balance (EUR)	9,711	11,323	9,201	8,732
Asset type				Unsecured consumer loans
WA remaining term (months)	63.9	65.0	61.0	70.6
WA seasoning (months)	12.6	12.4	14.0	13.6
WA interest rate (%)	6.7	6.7	6.6	7.9
Pre-approved (%)	86.0	87.3	80.3	83.0
Base case asset assumptions (%)				
Defaults (lifetime, blended)	4.25	4.0	3.75	5.5
Recoveries (blended)	25.0	20.0	20.0	30.0
Prepayments (annual)	10.0	10.0	7.0	10.0

Santander Consumo 8's portfolio data is of May 2025. WA figures are weighted by outstanding portfolio balance at May 2025.
Source: Fitch Ratings, transaction documents

Sector Risks: Additional Perspective

Key Sector Risks

Asset performance outlook	'Neutral'. Low unemployment and falling interest rates will support borrower income and keep defaults at low levels. See European Structured Finance Outlook 2025.
Sector outlook	'Stable'. Fitch believes that most rated Spanish ABS transactions are protected by sufficient rating headroom for the most immediate factors affecting asset performance.
Macroeconomic risks	Fitch estimates Spain's GDP will grow at 2.3% and 1.7% in 2025 and 2026. Fitch forecasts the Spanish unemployment rate and CPI inflation to be around 10.3% and 2.0% by the end of 2026. See Global Economic Outlook – April 2025 Update. Fitch has also recently affirmed Spain at 'A-' with a Positive Outlook. See Fitch Affirms Spain at 'A-'; Outlook Positive.

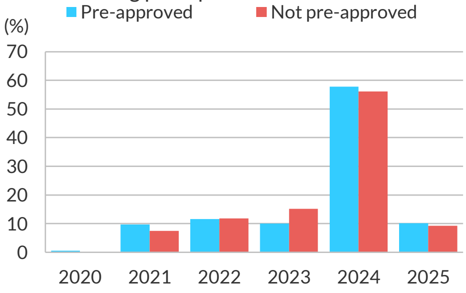
Source: Fitch Ratings

Asset Analysis

The portfolio consists of unsecured consumer loans originated by Santander to individuals residing in Spain. All borrowers pay monthly instalments, the loans amortise by the "French" method and are linked to a fixed interest rate. Moreover, around 86% of the portfolio balance is linked to pre-approved loans, and around 67% was originated between 2024 and 2025.

Origination Year

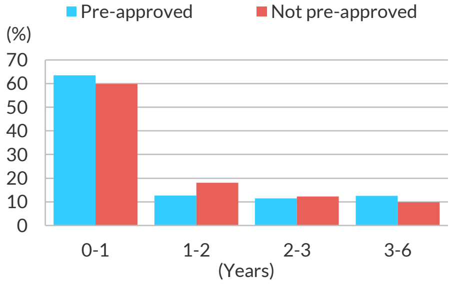
% Outstanding principal balance



Source: Fitch Ratings, Santander

Seasoning (Years)

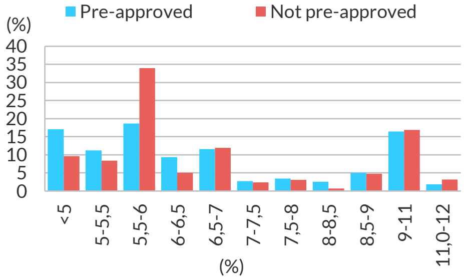
% Outstanding principal balance



Source: Fitch Ratings, Santander

Interest Rate(%)

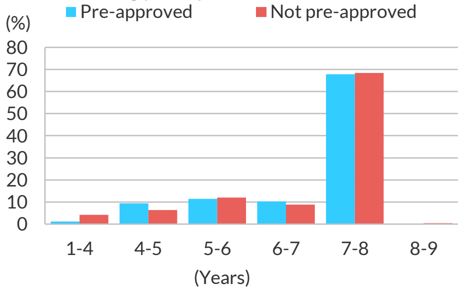
% Outstanding principal balance



Source: Fitch Ratings, Santander

Original Term (Years)

% Outstanding principal balance



Source: Fitch Ratings, Santander

Key Asset Eligibility Criteria

For the asset purchase to be made by the SPV, the following key eligibility criteria apply.

- The loans are granted for consumption purposes to Spanish residents and not employed by Santander, with a regulatory PD not higher than 6%.
- The loans are not restructured due to reasons of distress, and are not in arrears.
- The loans are fully amortising with monthly instalments paid by direct debit. None of the loans has an outstanding principal balance greater than EUR100,000.
- Each loan has at least one instalment paid.
- The maximum remaining term to maturity is nine years and the longest maturity date should not be later than the final maturity date.

Revolving Period

The SPV will purchase new eligible loans until April 2026 (inclusive) subject to the eligibility criteria and the portfolio covenants. The revolving period will be terminated earlier if any of the following key early amortisation events occur.

1. Sequential amortisation event occurs (see Pro-Rata Amortisation below).
2. The reserve fund is not fully funded.
3. The non-defaulted pool balance is less than 75% of the class A to E notes' outstanding balance.
4. The seller´s insolvency, seller ceases to perform or breaches its obligations.

During the revolving period, any available excess spread will be used to amortise the class F notes. The portfolio migration risk during the revolving period is contained by limits to the total portfolio including new purchases as described below. Assuming an annualised prepayment rate of 10%, we expect around 25% of the portfolio to be replenished during the revolving period.

Revolving Period Limits

Feature	Revolving period limit	Preliminary pool
Top obligor (%)	< 0.05	0.01
WA remaining term to maturity	< 84 months	62 months
Top region (%)	< 26.0	18.5
Top three regions (%)	< 65.0	47.9
WA interest rate (%)	>6.5	6.7
Loans greater than EUR60,000 (%)	< 5.0	0.5

Source: Fitch Ratings

Portfolio Credit Analysis

Fitch derived base-case default, recovery and prepayment assumptions considering the data provided by Santander, Spain's economic outlook and the originator and servicer capabilities. Fitch set a single base case for the entire pool (pre-approved and not pre-approved loans) considering the similar loan characteristics and performance expectations.

Default Rates

The default rate assumptions for the pool are displayed below.

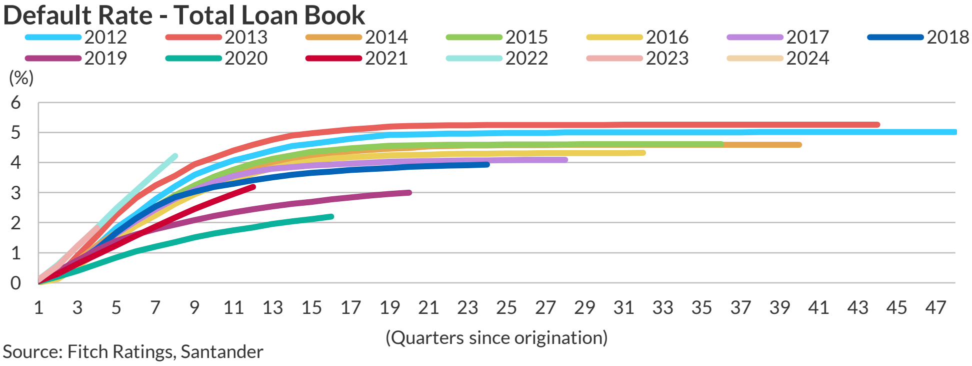
Default Rate Assumptions

Product type	Base case default rate (%)	AA multiple (x)	AA default rate (%)	AAA multiple (x)	AAA default rate (%)
Unsecured consumer loans	4.25	4.0	17.0	5.0	21.25

Source: Fitch Ratings

The charts below and on the right-hand side show the cumulative balance of defaults relative to the portfolio balance originated by vintage. Defaults are loans in arrears over 90 days.

Default Rate - Total Loan Book



Source: Fitch Ratings, Santander

Recovery Rates

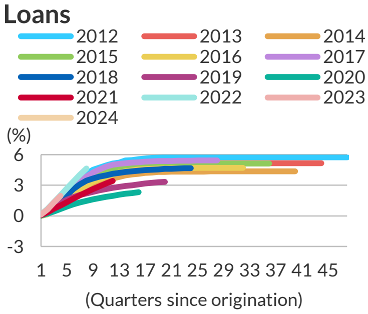
To calibrate recoveries in stress scenarios, we have applied median haircuts to the base case in line with our *Consumer ABS Rating Criteria*.

Recovery Rate Assumptions

Product type	Base case recovery rate (%)	AA haircut (%)	AA recovery rate (%)	AAA haircut (%)	AAA recovery rate (%)
Unsecured consumer loans	25.0	40.0	15.0	50.0	12.5

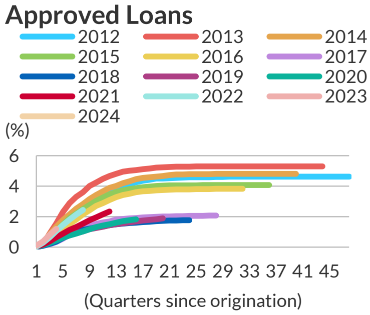
Source: Fitch Ratings

Default Rate - Pre-Approved Loans



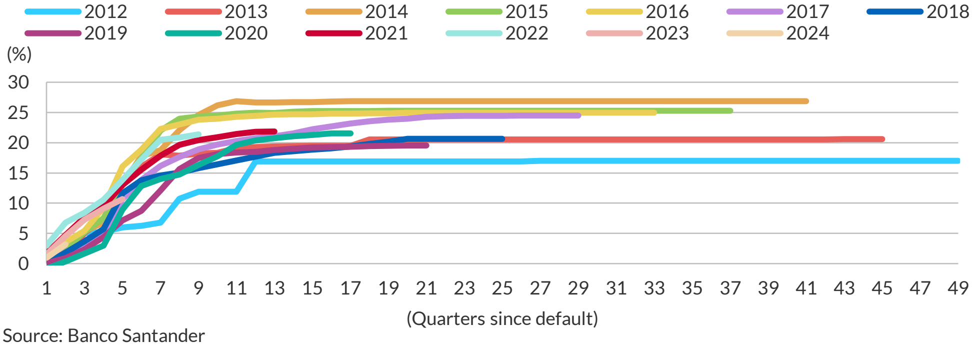
Source: Fitch Ratings, Santander

Default Rate - Not Pre-Approved Loans



Source: Banco Santander

Recovery Rate - Total Loan Book



Source: Banco Santander

Prepayments

Fitch calibrated a base-case prepayment assumption of 10% for the total pool based on comparable ABS data and considering the macroeconomic outlook. Low and high prepayment stresses are in line with Fitch's criteria.

Financial Structure and Cash Flow Analysis

The default and recovery rates for this portfolio, together with different timing of defaults and recoveries, levels of prepayment and interest rate stresses, were tested in Fitch's proprietary cash flow model to determine if there would be sufficient cash flows to pay interest and principal according to the terms of the notes. The default timing assumption was based on a weighted average life (WAL) of the portfolio of about 34 months, and the recovery timing was derived based on historical data. The analysis shows that the CE levels provided for the securitisation notes are sufficient to withstand the relevant stresses determined by Fitch for the assigned ratings.

The rating analysis addresses timely payment of interest on the class A notes but, for the remaining rated notes, interest is treated as timely only if the note is the most senior. The rating analysis addresses the ultimate repayment of principal for all the notes by the legal final maturity date in accordance with the transaction documentation.

Priority of Payments

The transaction operates a combined priority of payments with an implicit PDL mechanism that governs how the issuer's available funds are allocated on each quarterly interest payment date (IPD). Excess spread will be available to provision for defaults.

Available Funds (Simplified)

1.	Interest and principal collections from the loans
2.	Recoveries from defaulted assets and any additional amounts collected from the loans
3.	3. Reserve fund
4.	Yield from cash deposited in the TAB
5.	Net swap amounts (excluding collateral)
6.	Replacement servicer fee reserve if funded

Source: Fitch Ratings, transaction documents

The notes target amortisation amount is defined as the difference between the collateralised notes (class A to E notes) and the non-defaulted portfolio balance. Defaults are defined as loans in arrears over 90 days. Interest payments on the class E and F notes can be deferred to a junior position within the priority of payments if the gross cumulative defaults (GCD) ratio exceeds 4.25% relative to the initial portfolio balance.

Combined Priority of Payments (Simplified)

Pre-enforcement		Post-enforcement (if any of the mandatory early liquidation events occur)	
1	Senior fees and expenses	1	Senior fees and expenses
2	Net swap payments (if any) and termination payments (if the SPV is the defaulting party)	2	Net swap payments (if any) and termination payments (if the SPV is the defaulting party)
3	Class A interest	3	Class A interest
4	Class B interest	4	Class A principal
5	Class C interest	5	Class B interest
6	Class D interest	6	Class B principal
8	Class E interest (if not deferred)	7	Class C interest
7	Reserve fund top up	8	Class C principal
9	Class F interest (if not deferred)	9	Class D interest
10	Class A to E principal up to its target amount	10	Class D principal
11	Class E interest (if deferred)	11	Class E interest
12	Class F interest (if deferred)	12	Class E principal
13	Class F principal target amount	13	Class F interest
14	Subordinated amounts	14	Class F principal
		15	Subordinated amounts

Source: Fitch Ratings, transaction documents

Pro-Rata Amortisation

Since the first IPD after the revolving period, the class A to E notes will amortise pro rata until any of the below sequential amortisation events occur.

- Collateral trigger (defined as the ratio between non-defaulted portfolio divided by current note balance of classes A to E) is equal or lower than 99.50% for two consecutive IPDs.
- The GCD ratio exceeds the levels shown in the GCD Ratio Trigger table.
- Reserve fund remains below its required level in two consecutive IPDs.
- The swap counterparty trigger is breached and remedial actions are not implemented.
- Single borrower concentration greater than 0.1% of current pool balance.
- A breach of any of the seller's obligations or a servicer replacement event.
- The exercise of any seller's call options.
- Outstanding portfolio balance (including defaults) is less than 10% of initial balance at closing date.

Interest Rate Swap

The issuer entered into a balance guaranteed swap agreement to hedge against the fixed-floating interest rate mismatch, considering the 100% fixed-rate loans and floating-rate liabilities. Under the swap agreement, the issuer pays a fixed coupon of 2.034% and receives three-month Euribor, on a notional amount equal to the outstanding balance of the non-defaulted receivables.

GCD Ratio Trigger

IPD after closing	Trigger (%)
October2025	1.45
January 2026	1.75
April 2026	2.05
July 2026	2.45
October 2026	2.75
January 2027	3.15
April 2027	3.45
July 2027	3.75
October 2027	4.05
January 2028	4.35
April 2028	4.65
July 2028	4.95
October 2028	5.25
From January 2029	5.65

Source: Fitch Ratings, transaction documents

Reserve Fund

The reserve fund (RF) was funded at the closing date with the class F notes issuance proceeds, for an amount equivalent to 1.5% of the class A to E notes' initial balances. The RF can amortise from the first IPD maintaining the above-mentioned proportion subject to a floor of 0.5% of the class A to E initial balance. It cannot amortise if it was not at target on the prior IPD or if a sequential amortisation event has occurred.

The RF is available to cover senior expenses, net swap payments and interest on the class A to E notes. Moreover, any amounts in excess of its required balance will be released through the combined waterfall and so it can be used to repay the notes if there is any PDL (it provides CE protection). The RF will be fully released once class A to E are fully redeemed, at final legal maturity, or when the performing portfolio balance is zero.

Call Options

The clean-up call, the regulatory change and / or the tax change call options can only be exercised by the seller to the extent that the repurchase value, together with the rest of the available funds, is sufficient to redeem the rated notes in whole at par together with all accrued but unpaid interest. A clean-up call event is defined when the collateral balance (including defaulted loans) is equal to, or less than, 10% of the initial portfolio balance.

Regulatory events are defined as any change in any applicable law or its interpretation by any competent authority with a material negative effect on the benefit for the seller from the transaction. A tax call event takes place when the issuer becomes required by law, after the closing date, to deduct or withhold, in respect of any payment under any of the notes, current or future taxes, levies or governmental charges that materially affects the allocation of benefits among the parties of the transaction.

Expected Rating Sensitivity

Factors that Could, Individually or Collectively, Lead to Positive Rating Action/Upgrade Include:

- Increasing CE ratios as the transaction deleverages to fully compensate for the credit losses and cash flow stresses commensurate with higher rating scenarios.
- Due to the rating triggers envisaged by the transaction documents for the transaction account bank, the maximum achievable rating is AA+sf.

Factors that Could, Individually or Collectively, Lead to Negative Rating Action/Downgrade Include:

- Long-term asset performance deterioration such as increased delinquencies or reduced portfolio yield, which could be driven by changes in portfolio characteristics, business practices or the legislative landscape.
- For the class E notes, a combination of reduced excess spread and the late reception of recovery cash flows, particularly at the tail of the life of the transaction. This considers the thin layer of CE protection from subordination available to the class E notes, which is only provided by the RF.

Rating Sensitivities to Stressed Default and Recovery Assumptions

	Class A	Class B	Class C	Class D	Class E
Original rating	AA	A+	BBB+	BB+	B+
Increased default by 10%	AA-	A+	BBB+	BB+	B+
Increased default by 25%	A+	A	BBB	BB	B
Increased default by 50%	A-	BBB+	BBB-	BB-	CCC
Reduced recoveries by 10%	AA	A+	BBB+	BB+	B+
Reduced recoveries by 25%	AA	A+	BBB+	BB+	B+
Reduced recoveries by 50%	AA-	A	BBB	BB	B-
Increased defaults and reduced recoveries by 10% each	AA-	A	BBB+	BB+	B
Increased defaults and reduced recoveries by 25% each	A	A-	BBB-	BB	CCC
Increased defaults and reduced recoveries by 50% each	BBB+	BBB	BB	B	NR

Source: Fitch Ratings

The Rating Sensitivity section provides insight into the model-implied sensitivities the transaction faces when one assumption is stressed, while holding others equal. The modelling process uses the estimation and stress of these variables to reflect asset performance in a stressed environment. The results below should only be considered as one potential outcome, as the transaction is exposed to multiple dynamic risk factors. It should not be used as an indicator of possible future performance.

- No change or positive change
- Negative change within same category
- -1 category change
- -2 category change
- -3 or larger category change

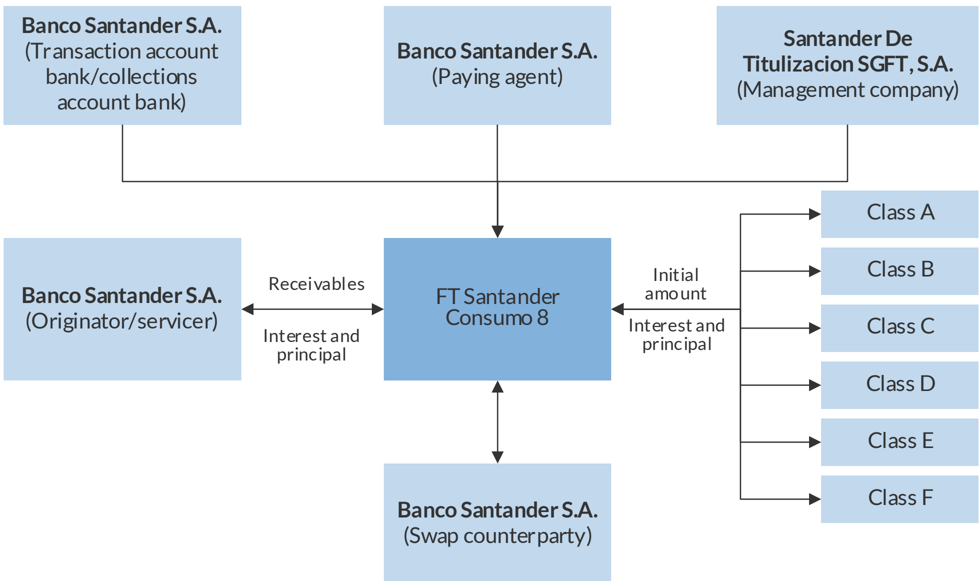
See report for further details

Best- and Worst-Case Rating Scenarios

International scale credit ratings of structured finance transactions have a best-case rating upgrade scenario (defined as the 99th percentile of rating transitions, measured in a positive direction) of seven notches over a three-year rating horizon; and a worst-case rating downgrade scenario (defined as the 99th percentile of rating transitions, measured in a negative direction) of seven notches over three years. The complete span of best- and worst-case scenario credit ratings for all rating categories ranges from 'AAAsf' to 'Dsf'. Best- and worst-case scenario credit ratings are based on historic performance.

Transaction Structure

Structure Diagram



Source: Fitch Ratings, transaction documents

Issuer and True Sale

The notes were issued by Santander Consumo 8, FT, incorporated under the laws of Spain, the sole purpose of which is to acquire consumer loans from Santander as collateral for the issuance of quarterly paying notes. The credit rights sold to the issuer consist of interest and principal instalments due by the borrowers under the loans, together with any recoveries obtained from them and other ancillary rights.

The trustee, which is supervised by the Spanish capital markets regulator, is responsible for cash reconciliation and waterfall calculations and reporting, including the monitoring of applicable triggers. It is also responsible for taking any action in the interests of noteholders, such as the replacement of ineligible counterparties if needed.

Representations and Warranties

The seller provided the issuer with specific representations and warranties (R&Ws) concerning the seller's organisation and the asset characteristics. The related appendix to this report includes the main R&Ws that are available to investors. The R&Ws are substantially comparable to those typically contained in other EMEA ABS transactions, as described in Fitch's *Representations, Warranties and Enforcement Mechanisms in Global Structured Finance Transactions*. Fitch made no adjustments to its analysis in relation to the representations and warranties.

Substitutions

If any of the loans do not comply with the R&Ws the seller will have to remedy, replace or redeem such asset. Within 15 business days from the date the party detected the non-conforming receivable, the originator, with the management company´s consent, agrees to remedy the breach, and if that is not possible, substitute the receivable. Any substitution will be made up to the outstanding principal plus interest accrued and not paid.

Loan Permitted Variations

Santander as the servicer is allowed to renegotiate and modify the loans without the prior consent of the trustee, and within the following limits.

- The interest rate on a loan must not be lower than 6.0%, and no loans may be novated from a fixed rate to a floating rate. The maximum novation in this case maybe up to 7.5% of the initial portfolio balance.
- The amount of the loan balance cannot be increased and the frequency of interest payments and repayment of principal payment cannot be decreased.
- Up to 10% of the initial portfolio balance can be subjected to maturity extensions. The longest maturity must be two years prior the transaction legal maturity date.

Fitch deems these loan modifications as not rating material, given the limits adequately prevent material alterations in the credit and cash flow profile of the pool.

Euribor Fall-Back Provisions (Simplified)

The transaction has fall-back provisions in place in the event of the discontinuation of Euribor as summarised below. Although the procedure does not fully guarantee that any alternative base rate on the notes and the swap remain identical at all times, Fitch considers the approach sufficiently robust.

Assets	Rated notes	Swap
None	The rate determination agent will determine the replacement rate. The new rate will be endorsed or approved by the relevant regulator or any stock exchange, utilised in a publicly listed new issue of euro-denominated asset-backed floating-rate notes where the originator of the relevant assets is Santander or an affiliate of the group. The change will not take place if the trustee deems it prejudicial for noteholders. All costs incurred for the base rate modification should be borne by the seller, and the trustee should notify the rating agencies and make reasonable efforts to ensure it does not negatively affect the ratings. Any change to the reference rate of the floating-rate notes will apply to the interest rate swap unless the swap counterparty decides not to accept the alternative base rate.	Standard fall-back provisions apply, which are aligned to the ISDA Benchmark Supplement. The new rate applicable to the derivative can result in a different rate than the one applicable on the notes. Both the SPV and the swap counterparty have the right to terminate the swap contract if not in agreement with the alternative rate. Nonetheless, both parties must use all reasonable efforts to agree on the actions to avoid the termination event.

Source: Fitch Ratings, transaction documents.

Disclaimer

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Counterparty Risk

Fitch assesses the counterparty risk under its *Structured Finance and Covered Bonds Counterparty Rating Criteria* to be in line with the ratings assigned based on the provisions in the documents and the analytical adjustments described in the following table.

Counterparty Risk Exposures

Counterparty type	Counterparty name	Minimum ratings under criteria	Minimum ratings and remedial actions under documents	Analytical adjustments
TAB	Santander	A- or F1 DR if assigned and applicable, otherwise IDR.	Minimum DR (or IDR if not available) of A- or F1; replacement or guarantee within 60 calendar days.	No adjustment. Minimum ratings and remedial actions in line with criteria up to AA+sf ratings.
Hedge provider	Santander	A- or F1 DCR if assigned and applicable, otherwise IDR.	Minimum dynamic ratings, considering the highest rated note. DCR or IDR if not available. At closing, A-or F1 as the highest rated note is AAsf. For example, A or F1 if the highest rated note is AAAsf. Remedials include collateralisation within 14 calendar days, or replacement or guarantee within 60 calendar days.	No adjustment. Minimum ratings and remedial actions in line with criteria up to AAAsf ratings.
Originator, servicer, CAB	Santander	BBB or F2 IDR	Minimum IDR of A-; posting the servicing fee reserve within 60 calendar days.	Servicing disruption risk is mitigated by the RF liquidity that covers the payment interruption risk exposure amount, and the servicer fee reserve. Collections are swept by the CAB into the TAB within two business days.
Paying agent	Santander	None.	n.a.	Operational risk. The paying agent provider has ample operational capabilities and international record.

Source: Fitch Ratings, transaction documents

Transaction Account Bank

Banco Santander, S.A. acts as TAB provider, holding the RF and the collections from the assets. Fitch classifies this exposure as a primary credit risk under its counterparty criteria. Fitch considers the structure to adequately address TAB counterparty risk by incorporating rating eligibility thresholds that would trigger remedial actions within 60 calendar days if the TAB provider's deposit rating (or IDR if not available) is downgraded below 'A-' and 'F1'. The remedial actions upon loss of eligibility include replacement or guarantee from an eligible entity. Costs related to the replacement will be borne by the counterparty.

Hedge Provider

Banco Santander, S.A. acts as interest rate swap provider. Fitch classifies this exposure as a primary credit risk under its counterparty criteria. Fitch believes the structure adequately addresses hedge provider counterparty risk by incorporating dynamic minimum ratings that would trigger remedial actions if the hedge provider's DCR (or IDR if not available) is downgraded below established thresholds. At closing, the minimum rating is 'A-' or 'F1'. Remedial actions include collateralisation (within 14 calendar days), replacement with an eligible counterparty, or eligible guarantor (within 60 calendar days).

As the transaction documents link the minimum rating of the swap provider to the rating category of the most senior notes, this feature may limit upgrades of the most senior notes in the future where the hedge provider is not eligible to support higher note ratings.

Portfolio Servicer

The issuer has appointed Santander to act as its servicer in accordance with the terms of the servicing agreement. Fitch has conducted an operational review with Santander to assess, among other things, its business strategy, underwriting practices and servicing capabilities.

If a servicer termination event occurs, or if the servicer IDR is downgraded below A-, the servicer, within 60 days, will post a servicing fee reserve sized at 1.0% of the outstanding portfolio balance multiplied by its WAL assuming zero prepayments or defaults.

Payment Interruption and Commingling Risk

We view payment interruption risk as sufficiently mitigated. If a servicer event leads to a collection disruption, the RF is available to cover an estimated period of at least three months of senior costs, net swap payments (if any) and interest on the class A to E notes, a period we consider sufficient to implement alternative arrangements.

Fitch views commingling risk as immaterial for this transaction due to the transfer of direct debit collections from the CAB to the TAB within two business days, and an adequate borrower notification process upon a servicer termination event.

Set-Off Risk

Banco Santander, S.A. is a deposit-taking institution. Fitch does not consider deposit set-off risk material for the ratings due to the legal framework in Spain, which establishes that set-off would only be applicable to debts that are due and enforceable (amounts in arrears) and that none of the debts are subject to disputes if notified to the obligor. Moreover, this risk is also protected by the Deposit Guarantee Scheme in Spain, which protects deposits of up to EUR100,000.

Insurance set- off risk is assessed as non-ratings material by Fitch as premium payments represent less than a 1% of the portfolio balance and Spain's insurance industry has a clear regulatory framework which protects customer claims following an insurer default. In the event of the default of an insurer, the Insurance Compensation Consortium, a Spanish public entity, will be in charge of liquidating the defaulted insurer and settling policyholder obligations.

Criteria Application, Model and Data Adequacy

Criteria Application

See page 2 for the list of Applicable Criteria.

Fitch applies the *Consumer ABS Rating Criteria* as its sector-specific criteria report under the overarching framework provided by the *Global Structured Finance Rating Criteria*, the master criteria report for the sector. The *Structured Finance and Covered Bonds Country Risk Rating Criteria* report outlines Fitch's approach to assigning and maintaining structured finance and covered bond ratings, where the relevant sovereign's Local-Currency IDR is below 'AAA'. The remaining criteria listed under Applicable Criteria are cross-sector, outlining aspects of Fitch's approach to counterparty risk and interest rate change that are relevant for the ratings.

Models

Consumer ABS Asset Model

Multi-Asset Cash Flow Model

Data Adequacy

Fitch has been provided with the following data for its analysis. The list below is not exhaustive.

- Default and recovery vintages on a quarterly basis, and origination volumes from 2012 to 4Q24.

- Loan-by-loan portfolio data as of March 2025.
- Pool stratifications and amortisation profile as of March 2025.

Fitch carried out a file review as part of the originator review process with satisfactory results. Fitch also reviewed the results of a third-party assessment conducted on the asset portfolio information and concluded that there were no findings that affected the rating analysis.

Surveillance

Fitch will monitor the transaction regularly and as warranted by events, with a review conducted at least yearly. Performance reports will be provided by the management company on a quarterly basis. Fitch's quantitative analysis will focus on monitoring the key performance parameters (delinquencies, defaults, recoveries and prepayments) against the agency expectations. Fitch's structured finance performance analytics team will ensure that the assigned ratings remain, in the agency's view, an appropriate reflection of the issued notes' credit risk. Details of the transaction's performance will be available to subscribers at www.fitchratings.com.

Appendix 1: Origination and Servicing

Originator Overview

Santander is one of the largest retail banks in Spain, it is classified as an operational continuity bank and is supervised by the ECB. Santander originates consumer loans mainly through online applications or branches.

Fitch held a meeting with Santander management at which it concluded that its origination and servicing capabilities were robust and generally aligned with standard market practices.

Underwriting

Pre-approved consumer loans represented around 80% of total consumer lending in 2024 for Santander, increasing from around 50% in 2015. Pre-approved loans as a share of origination volumes have steadily increased since 2021. Pre-approved loans are granted to existing customers with a minimum of a three-month current account record with the lender, allowing Santander to assess its credit profile and assign a pre-approved credit limit. This credit limit is re-assessed by Santander typically twice a month, reflecting the latest information available from the borrower.

The underwriting workflow is mainly driven by an automated decision process, which relies on behavioral and scoring model outcomes. Scoring models vary depending on the characteristic of the borrower, mainly depending on whether it is to assign pre-approved limits or sanctioning not pre-approved loans.

Since 3Q22 Santander has tightened the pre-approval loans origination process by differentiating between first-time pre-approved customers and older customers who had been pre-approved before. Similarly, since mid-2023, Santander has increased the credit quality thresholds for those borrowers with weaker records.

Loan applications are processed and scored automatically by Santander´s systems that might result in an automatic rejection, automatic approval or in limited cases are directed for manual analysis. Loan applications, independent of the origination channel, are processed through the same system.

Servicing

Santander´s servicing practices for unsecured consumer loans are in line with market standards. There has been a recent change in the recovery model with focus on enhanced digital capabilities, analytics to increase personalisation, and industrial solutions to deal with high volumes of customer difficulties.

The arrears management process begins from the first unpaid instalment. During all the phases of the recovery both internal and external teams co-manage the process. Santander's teams are more focused on the early stages of the process (arrears of up to 90 days) while external agencies are focused on distressed loans in arrears over 90 days.

Appendix 2: ESG Relevance Score

FitchRatings

Santander Consumo 8, FT

SF ESG Navigator
Consumer ABS - Unsecured

Credit-Relevant ESG Derivation

Santander Consumo 8, FT has 5 ESG potential rating drivers

- Santander Consumo 8, FT has exposure to macroeconomic factors and sustained structural shifts in secular preferences affecting consumer behavior but this has very low impact on the rating.
- Governance is minimally relevant to the rating and is not currently a driver.

			ESG Relevance to Credit Rating
key driver	0	issues	5
driver	0	issues	4
potential driver	5	issues	3
not a rating driver	5	issues	2
	4	issues	1

Environmental (E) Relevance Scores

General Issues	E Score	Sector-Specific Issues	Reference	E Relevance
GHG Emissions & Air Quality	2	n.a.	n.a.	5
Energy Management	2	n.a.	n.a.	4
Water & Wastewater Management	1	n.a.	n.a.	3
Waste & Hazardous Materials Management; Ecological Impacts	1	n.a.	n.a.	2
Exposure to Environmental Impacts	2	Asset, operations and/or cash flow exposure to extreme weather events and other catastrophe risks, including but not limited to flooding, hurricanes, tornadoes, and earthquakes	Surveillance	1

Social (S) Relevance Scores

General Issues	S Score	Sector-Specific Issues	Reference	S Relevance
Human Rights, Community Relations, Access & Affordability	1	Risk-based pricing/repricing, social programs, services geared to underbanked/underserved communities and impact on accessibility and affordability	Surveillance	5
Customer Welfare - Fair Messaging, Privacy & Data Security	2	Compliance with consumer protection related regulatory requirements, such as fair/transparent lending, data security, and safety standards	Surveillance	4
Labor Relations & Practices	2	n.a.	n.a.	3
Employee Wellbeing	1	n.a.	n.a.	2
Exposure to Social Impacts	3	Macroeconomic factors and sustained structural shifts in secular preferences affecting consumer behavior	Asset Quality; Pool Composition; Surveillance	1

Governance (G) Relevance Scores

General Issues	G Score	Sector-Specific Issues	Reference	G Relevance
Rule of Law, Institutional and Regulatory Quality	3	Jurisdictional legal risks; regulatory effectiveness; supervisory oversight; foreclosure laws; government support and intervention	Asset Isolation and Legal Structure; Asset Quality; Rating Caps; Surveillance	5
Transaction & Collateral Structure	3	Asset isolation; resolution/insolvency remoteness; legal structure; structural risk mitigants; complex structures	Asset Isolation and Legal Structure; Asset Quality; Financial Structure; Rating Caps; Surveillance	4
Transaction Parties & Operational Risk	3	Counterparty risk; origination, underwriting and/or aggregator standards; borrower/lessee/sponsor risk; originator/servicer/manager/operational risk	Asset Quality; Financial Structure; Operational Risk; Rating Caps; Surveillance	3
Data Transparency & Privacy	3	Transaction data and periodic reporting	Asset Isolation and Legal Structure; Asset Quality; Financial Structure; Surveillance	2
				1

How to Read This Page
ESG relevance scores range from 1 to 5 based on a 15-level color gradation. Red (5) is most relevant to the credit rating and green (1) is least relevant.
The Environmental (E), Social (S) and Governance (G) tables break out the ESG general issues and the sector-specific issues that are most relevant to each industry group. Relevance scores are assigned to each sector-specific issue, signaling the credit-relevance of the sector-specific issues to the issuer's overall credit rating. The Criteria Reference column highlights the factor(s) within which the corresponding ESG issues are captured in Fitch's credit analysis. The vertical color bars are visualizations of the frequency of occurrence of the highest constituent relevance scores. They do not represent an aggregate of the relevance scores or aggregate ESG credit relevance.
The Credit-Relevant ESG Derivation table's far right column is a visualization of the frequency of occurrence of the highest ESG relevance scores across the combined E, S and G categories. The three columns to the left of ESG Relevance to Credit Rating summarize rating relevance and impact to credit from ESG issues. The box on the far left identifies any ESG Relevance Sub-factor issues that are drivers or potential drivers of the issuer's credit rating (corresponding with scores of 3, 4 or 5) and provides a brief explanation for the relevance score. All scores of '4' and '5' are assumed to reflect a negative impact unless indicated with a '+' sign for positive impact.
Classification of ESG issues has been developed from Fitch's sector ratings criteria. The General Issues and Sector-Specific Issues draw on the classification standards published by the United Nations Principles for Responsible Investing (PRI), the Sustainability Accounting Standards Board (SASB), and the World Bank.

CREDIT-RELEVANT ESG SCALE - DEFINITIONS

How relevant are E, S and G issues to the overall credit rating?

5	Highly relevant; a key transaction or program rating driver that has a significant impact on an individual basis.
4	Relevant to transaction or program ratings; not a key rating driver but has an impact on the ratings in combination with other factors.
3	Minimally relevant to ratings; either very low impact or actively mitigated in a way that results in no impact on the transaction or program ratings.
2	Irrelevant to the transaction or program ratings; relevant to the sector.
1	Irrelevant to the transaction or program ratings; irrelevant to the sector.

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