

C. N. M. V.
Dirección General de Mercados e Inversores
C/ Edison 4
Madrid

COMUNICACIÓN DE HECHO RELEVANTE

CIBELES III FTPYME, FONDO DE TITULIZACIÓN DE ACTIVOS Actuaciones sobre las calificaciones de los bonos por parte de Standard & Poor's.

Titulización de Activos, Sociedad Gestora de Fondos de Titulización, S.A. comunica el siguiente Hecho Relevante:

I. Respecto al fondo de referencia, adjuntamos nota de prensa publicada por Standard & Poor's, con fecha 29 de octubre de 2014, donde se hace referencia a las siguientes actuaciones sobre las calificaciones:

- **Bono C:** de **BBB (sf)** a **AA (sf)**.

En Madrid, a 30 de octubre de 2014

Ramón Pérez Hernández
Director General

RatingsDirect®

Rating Raised On CIBELES III FTPYME's Class C Spanish SME CLO Notes Following Criteria Update

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OVERVIEW

- We have reviewed CIBELES III FTPYME under our updated criteria for rating single-jurisdiction securitizations above the sovereign foreign currency rating.
- We have also applied our SME CLO and current counterparty criteria to perform our credit and cash flow analysis.
- Following our review, we have raised to 'AA (sf)' from 'BBB (sf)' our rating on the class C notes.
- CIBELES III FTPYME is a single-jurisdiction cash flow CLO transaction backed by SME loans. It closed in December 2003 and is currently amortizing.

LONDON (Standard & Poor's) Oct. 29, 2014--Standard & Poor's Ratings Services today raised to 'AA (sf)' from 'BBB (sf)' its credit rating on CIBELES III FTPYME, Fondo de Titulizacion de Activos' class C notes.

We have used data from the August 2014 investor report to perform our credit and cash flow analysis and have applied our European small and midsize enterprise (SME) collateralized loan obligation (CLO) criteria and our current counterparty criteria (see "European SME CLO Methodology And Assumptions," published on Jan. 10, 2013, and "Counterparty Risk Framework Methodology And

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Assumptions," published on June 25, 2013). We have also applied our updated criteria for rating single-jurisdiction securitizations above the sovereign foreign currency rating (RAS criteria) (see "Methodology And Assumptions For Ratings Above The Sovereign--Single-Jurisdiction Structured Finance," published on Sept. 19, 2014).

CREDIT ANALYSIS

CIBELES III FTPYME is a single-jurisdiction cash flow CLO transaction securitizing a portfolio of SME loans that was originated by Caja de Ahorros y Monte de Piedad de Madrid in Spain. The transaction closed in December 2003.

We have applied our European SME CLO criteria to determine the scenario default rate (SDR)--the minimum level of portfolio defaults that we expect each tranche to be able to withstand at a specific rating level using CDO Evaluator.

To determine the SDR, we adjusted the archetypical European SME average 'b+' credit quality to reflect two factors (country and originator and portfolio selection adjustments).

We ranked the originator into the moderate category (see tables 1, 2, and 3 in our European SME CLO criteria). Taking into account Spain's Banking Industry Country Risk Assessment (BICRA) score of 6 and the originator's average annual observed default frequency, we have applied a downward adjustment of one notch to the 'b+' archetypical average credit quality (see "Banking Industry Country Risk Assessment Update: October 2014," published on Oct. 8, 2014). To address differences in the creditworthiness of the securitized portfolio compared with the originator's entire loan book, we further adjusted the average credit quality by three notches (see table 4 in our European SME CLO criteria).

As a result of these adjustments, our average credit quality assessment of the portfolio was 'ccc', which we used to generate our 'AAA' SDR.

We have calculated the 'B' SDR, based primarily on our analysis of historical SME performance data and our projections of the transaction's future performance. We have reviewed the originator's historical default data, and assessed market developments, macroeconomic factors, changes in country risk, and the way these factors are likely to affect the loan portfolio's creditworthiness.

We interpolated the SDRs for rating levels between 'B' and 'AAA' in accordance with our European SME CLO criteria.

RECOVERY RATE ANALYSIS

We applied a weighted-average recovery rate (WARR) at each liability rating level by considering the asset type and its seniority, the country recovery grouping, and the observed historical recoveries in this transaction (see table 7 in our European SME CLO criteria).

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COUNTRY RISK

Our long-term unsolicited rating on the Kingdom of Spain is 'BBB'. Our RAS criteria require the tranche to have sufficient credit enhancement to pass a minimum of a "severe" stress to qualify to be rated above the sovereign (see "Understanding Standard & Poor's Rating Definitions," published on June 3, 2009 for our definitions of severe and extreme levels of economic stress).

COUNTERPARTY RISK

We consider the transaction's documented replacement mechanisms to adequately mitigate its exposure to counterparty risk under our current counterparty criteria.

CASH FLOW ANALYSIS

We used the reported portfolio balance that we considered to be performing, the principal cash balance, the current weighted-average spread, and the weighted-average recovery rates that we considered to be appropriate. We subjected the capital structure to various cash flow stress scenarios, incorporating different default patterns and timings and interest rate curves, to determine the rating level, based on the available credit enhancement for each class of notes under our European SME CLO criteria.

Under our RAS criteria, we can rate a securitization up to four notches above our foreign currency rating on the sovereign if the tranche can withstand "severe" stresses. However, if all six of the conditions in paragraph 48 of the RAS criteria are met (including credit enhancement being sufficient to pass an extreme stress), we can assign ratings in this transaction up to a maximum of six notches (two additional notches of uplift) above the sovereign rating. The available credit enhancement for the class C notes withstands extreme stresses. We have therefore raised to 'AA (sf)' from 'BBB (sf)' our rating on the class C notes.

STANDARD & POOR'S 17G-7 DISCLOSURE REPORT

SEC Rule 17g-7 requires an NRSRO, for any report accompanying a credit rating relating to an asset-backed security as defined in the Rule, to include a description of the representations, warranties, and enforcement mechanisms available to investors and a description of how they differ from the representations, warranties, and enforcement mechanisms in issuances of similar securities. The Rule applies to in-scope securities initially rated (including preliminary ratings) on or after Sept. 26, 2011.

If applicable, the Standard & Poor's 17g-7 Disclosure Report included in this credit rating report is available at <http://standardandpoorsdisclosure-17g7.com>

RELATED CRITERIA AND RESEARCH

Rating Raised On CIBELES III FTPYME's Class C Spanish SME CLO Notes Following Criteria Update

Related Criteria

- Methodology And Assumptions For Ratings Above The Sovereign--Single-Jurisdiction Structured Finance, Sept. 19, 2014
- Update To Global Methodologies And Assumptions For Corporate Cash Flow And Synthetic CDOs, Aug. 1, 2014
- Counterparty Risk Framework Methodology And Assumptions, June 25, 2013
- European SME CLO Methodology And Assumptions, Jan. 10, 2013
- Understanding Standard & Poor's Rating Definitions, June 3, 2009

Related Research

- Banking Industry Country Risk Assessment Update: October 2014, Oct. 8, 2014
- Standard & Poor's Ratings Definitions, Sept. 22, 2014
- EMEA Structured Finance, Covered Bond, And Multicedulas Ratings Placed Under Criteria Observation, Sept. 18, 2014
- European Structured Finance Scenario And Sensitivity Analysis 2014: The Effects Of The Top Five Macroeconomic Factors, July 8, 2014
- Global Structured Finance Scenario And Sensitivity Analysis: Understanding The Effects Of Macroeconomic Factors On Credit Quality, July 2, 2014
- European SME Mapping Model, Jan. 25, 2013

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