

TCW

Principles-Based Bond Definition and Capital Efficient Investment Capabilities

August 2026

Principles-Based Bond Definition:

1 TCW's Approach and Examples

Executive Summary

What's PBBD? What to watch out for?

- PBBD is a categorization exercise for debt securities
 - PBBD applies to debt securities (Pass: Schedule D / Fail: Schedule BA)
 - PBBD does not apply to mortgage loans (Schedule B)
- Big impact on accounting schedules
- Moderate impact on capital requirements, for now

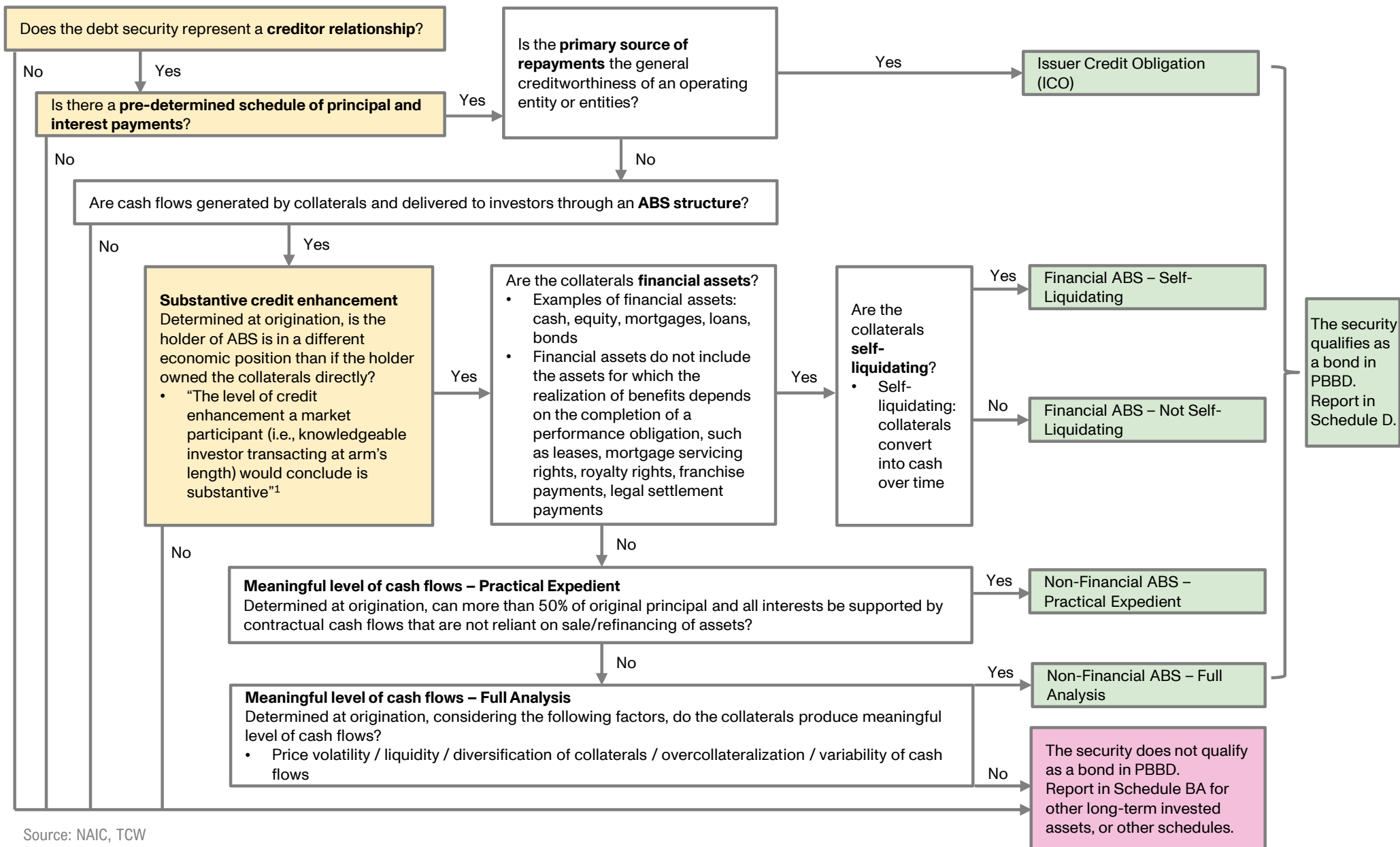
TCW's approach: our PBBD flow chart

- The key is investor's perspective on credit enhancement
- Close collaboration between investment and insurance teams
- TCW provides PBBD analysis and reporting to support clients
- TCW supports clients to challenge accounting vendors

Examples

- What assets pass the PBBD test?
- What assets fail the PBBD test? Do all CFOs with equity risk fail the PBBD test?

TCW's PBBD Flow Chart



Source: NAIC, TCW

¹NAIC: Statement of Statutory Accounting Principles No. 26 Bonds. <https://content.naic.org/sites/default/files/inline-files/SSAP%20No.pdf>

What Assets Pass the PBBD Test: Schedule D Line Items

Issuer Credit Obligation (ICO)

Schedule D, Part 1, Section 1

- **US Government Obligations**
- **Non-US Sovereign Jurisdiction Securities**
 - Both USD and Non-USD
- **Municipal Bonds**
- **Project Finance Bonds Issued by Operating Entities**
 - Non-municipal securities
 - Finances a single asset or operation
 - Examples
 - Toll roads
 - Power generation facilities
- **Corporate Bonds**
 - Include optionally convertible bonds
- **Mandatory Convertible Bonds**
- **Bank Loans**
- **Single Entity Backed Obligations**
 - Determined at origination, the underlying operating entity provides all cash flows to satisfy all interest and $\geq 95\%$ of principal
 - Examples
 - Equipment trust certificates
 - Enhanced equipment trust certificates
 - Single-tenant lease-backed securities
 - Funding agreement backed notes
- **SVO-Identified Bond ETFs**
- **Bonds Issued by 40-Act Registered Closed-End Funds and Business Development Corporations**
- **Mortgage Loans that Qualify as SVO-Identified Credit Tenant Loans**
- **Certificates of Deposit**

Asset-Backed Securities (ABS)

Schedule D, Part 1, Section 2

- **Financial ABS – Self-Liquidating**
 - The underlying collateral has contractual principal and interest that results with a conversion into cash over time
 - Examples: Debt tranches of
 - RMBS
 - CMBS
 - CLO
 - SASB
- **Financial ABS – Not Self-Liquidating**
 - Examples: Debt tranches of
 - Equity-backed securities
 - Certain collateralized fund obligations (CFOs)
- **Non-Financial ABS**
 - Collaterals should generate meaningful cash flows
 - Practical expedient
 - Full analysis
 - Examples: Debt tranches of
 - Lease-backed securitizations
 - Whole business securitizations
 - Legal settlement securitizations

Source: NAIC, TCW

What Assets Fail the PBBD Test: Examples

No Creditor Relationship

- Collateral notes/CFOs whose cash flows are linked to underlying equity performance
- Hybrid notes where issuer can cancel interest non-cumulatively without default

No Credit Enhancements

- CLO equity
- Auto residual
- Uni-tranche SASB without other credit enhancements

Source: NAIC, TCW

Analyzing CFOs

Key question: Has the underlying equity risks been sufficiently redistributed through the capital structure?

- Number and diversification of the underlying equity interests
- Characteristics of the underlying equity interests (vintage, asset-types, etc.)
- Liquidity facilities
- Overcollateralization
- Waiting period for distributions/paydowns to begin
- Capitalization of interest
- Covenants (e.g., loan-to-value trigger provisions)
- Reliance on ongoing sponsor commitments

Source: NAIC, TCW

PBBD Has Moderate Impact on Capital Requirements, For Now

Schedule D vs. Schedule BA

Schedule D: Bonds

NAIC Designation	Rating	Life Pre-Tax RBC
Exempt Obligations	-	0.00%
Bonds NAIC 1.A	AAA	0.16%
Bonds NAIC 1.B	AA+	0.27%
Bonds NAIC 1.C	AA	0.42%
Bonds NAIC 1.D	AA-	0.52%
Bonds NAIC 1.E	A+	0.66%
Bonds NAIC 1.F	A	0.82%
Bonds NAIC 1.G	A-	1.02%
Bonds NAIC 2.A	BBB+	1.26%
Bonds NAIC 2.B	BBB	1.52%
Bonds NAIC 2.C	BBB-	2.17%
Bonds NAIC 3.A	BB+	3.15%
Bonds NAIC 3.B	BB	4.54%
Bonds NAIC 3.C	BB-	6.02%
Bonds NAIC 4.A	B+	7.39%
Bonds NAIC 4.B	B	9.54%
Bonds NAIC 4.C	B-	12.43%
Bonds NAIC 5.A	CCC+	16.94%
Bonds NAIC 5.B	CCC	23.80%
Bonds NAIC 5.C	CCC-	30.00%
Bonds NAIC 6	CC/C/D	30.00%

Schedule BA: Other Long-Term Assets

NAIC Designation	Rating	Life Pre-Tax RBC
Exempt Obligations	-	0.00%
Bonds NAIC 1	AAA to A-	0.39%
Bonds NAIC 2	BBB+ to BBB-	1.26%
Bonds NAIC 3	BB+ to BB-	4.46%
Bonds NAIC 4	B+ to B-	9.70%
Bonds NAIC 5	CCC+ to CCC-	22.31%
Bonds NAIC 6	CC/C/D	30.00%
Schedule BA Collateral Loans	-	6.80%
Residual Tranches or Interests	-	45.00%
Other Schedule BA Assets	-	30.00%

Source: NAIC, TCW

2 Appendix: Non-Financial ABS Case Study

Case Study: ALLO 2025-1A C

(1 of 3)

Non-Financial ABS

- Assets: Fiber to the Premises (FTTP) infrastructures including optic cables, conduit, and splicing closures
- Primary cash flow source: recurring service revenues

Credit Enhancements

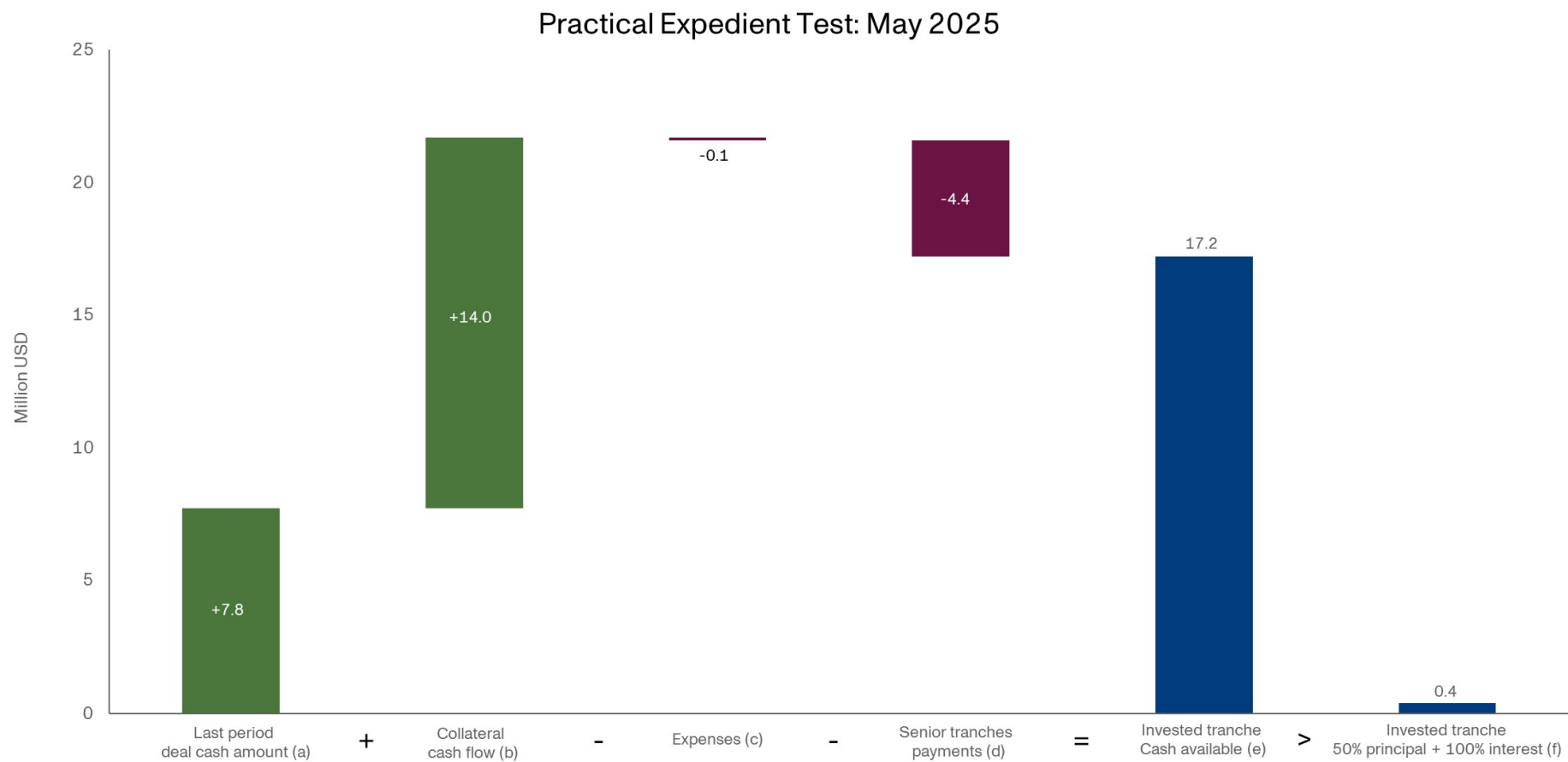
- Cash trap reserve
- Liquidity reserve
- Operating expense reserve

Practical Expedient Test

- Cash flow projection as of origination
- Cash amount available > 50% principal + 100% interest

Case Study: ALLO 2025-1A C

(2 of 3)



Source: TCW, Bloomberg, Intex. Cash flow projection is as of April 4, 2025.

Case Study: ALLO 2025-1A C

(3 of 3)

Reporting Sample

Primary Identifier	01983KAS3												
Security Name	ALLO 2025-1A C												
Issue Date	4/4/2025												
Estimated Date of Repayment	4/20/2030												
Non-Financial ABS													
Practical Expedient Test	Pass												

Source: TCW, Bloomberg, Intex. Cash flow projection is as of April 4, 2025.

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