

Financial Services Regulation Committee,
House of Lords,
London SW1A 0PW

Submitted by email to: hlfinserveg@parliament.uk

17 October 2025

Dear Committee Members,

LMA response: inquiry into the growth of private markets in the UK following reforms introduced after 2008 (the “Inquiry”)

I am pleased to respond to the Committee’s Call for Evidence in relation to the Inquiry on behalf of the Loan Market Association (**LMA**).

The LMA’s membership comprises a broad and expanding range of participants in the primary and secondary loan markets in Europe, the Middle East and Africa (EMEA). We represent both banks and institutional investors (representing some \$29 trillion AUM¹) as well as private and public sector issuers, technology solution providers, and market infrastructure entities².

The private markets span both equity (private equity, venture capital, infrastructure and real assets) and debt (private credit). As representatives of the loan market, our contribution to the Inquiry is focussed primarily on private credit, which refers to finance provided to companies by funds, rather than banks, bank-led syndicates, or the public debt capital markets.

Overall, our members view the growth of private credit, which operates as both a substitute and a complement to bank lending, as a positive development. Private credit is now a significant source of long-term financing to the real economy that has helped shift risk away from historic concentrations in the banking sector. The emergence of

¹ AUM across all asset classes (public and private including equities and real assets).

² See Annex 1.

private credit funds has also provided notable revenue growth opportunities for the banks, including as liquidity providers to the private markets (fund finance).

Accordingly, the LMA is keen to engage with the Committee on this important topic and to ensure that Government and regulators are equipped to approach any future policy measures in a proportionate manner that acknowledges the benefits of the growth of private credit to the financial sector and the real economy.

Please do not hesitate to contact scott.mcmunn@lma.eu.com and amelia.slocombe@lma.eu.com should you wish to discuss this response in more detail.

Yours faithfully,

Scott McMunn

Chief Executive Officer, Loan Market Association

LMA RESPONSE: INQUIRY INTO THE GROWTH OF PRIVATE MARKETS IN THE UK FOLLOWING REFORMS INTRODUCED AFTER 2008

Executive Summary

Data indicates that bank lending to real economy in the UK has reduced as a proportion of total finance and that post-2008 regulation has been a significant driver. In the PE-sponsor-backed middle market, private credit funds are more active than banks. Private credit has also increased in scale and in range. Competition between banks and private credit in the leveraged space has increased as the quantum of debt private funds are able to support has risen. Traditionally focussed on direct lending and acquisition finance, private credit funds are now active in asset-backed lending, project and infrastructure finance, digital infrastructure and commercial real estate.

We would identify the most significant interconnections between UK banks and private credit (in terms of prevalence) as:

- Co-investment in leveraged loans - Private credit funds cannot generally provide working capital, cash management and other banking services, so banks maintain a vital role in direct lending transactions. Banks and private credit also co-invest in secured leveraged term debt. These relationships have led a number of banks to enter into partnerships with private credit funds, or to establish private credit platforms to compete with them directly.
- Fund finance - The growth of private markets has brought with it increased demand from PE and credit funds for liquidity support from the banking sector, in the form of secured subscription lines and NAV facilities.
- Synthetic risk transfer (SRT) - Private credit funds have emerged as a key investor in SRT; a structured form of loan securitisation undertaken by banks that provides private credit investors with exposure to a range of assets that may be difficult for funds to access directly.

These interconnections offer benefits to the banking sector, private credit and the real economy alike. Private credit provides the real economy with access to a flexible, relationship-driven alternative source of funding that has tended to be resilient through market stress. Demand for fund finance and private credit appetite for SRT has provided the banking sector with new opportunities.

The now well-established position of private credit in the funding landscape would suggest an expectation of future growth at least in line with overall lending volumes. In general, credit exposures between banks and funds are collateralised and the already-regulated structures adopted credit funds limit the potential for contagion and systemic risk. We would therefore underline the importance of the UK's regulatory regime remaining internationally competitive and proportionate to the risks of the private markets.

Specific responses

Question 1: Has bank lending to the real economy in the UK reduced as a proportion of the total volume of finance provided annually since 2008? If so, to what extent can this change be attributed to the reforms to the UK's regulation of bank capital and liquidity requirements? To what extent has any reduction led to an increase in finance by private markets?

1. Official sector and industry data illustrates that bank lending to the real economy³ in the UK has reduced as a proportion of the total, and that the private markets have increased their share of the total. Between 2008 and 2023, net lending to UK businesses increased by some £425 billion, with non-bank sources of finance accounting for almost all of that increase⁴. While private debt activity is growing in a number of European jurisdictions, the UK remains the main source of deal volume for private debt lenders in Europe⁵.
2. Research by UK Finance⁶ focussing on the period 2013 to 2024 highlights how capital sources have diversified, with new issuances “*increasingly originated via private market operators*” (venture capital⁷, private equity and private credit). Traditional bank financing accounted for £487.0bn (89.1%) of the total £546.5bn of debt finance provided in 2024, with the remaining £59.5bn (10.9%) provided by non-bank sources, including private credit funds.
3. The UK data reflects a global trend. The FSB’s most recent global monitoring report indicates that that non-bank finance has grown to represent approximately half of global financial sector assets⁸.
4. Reforms implemented in the wake of the global financial crisis (most notably the implementation of the Basel III standards) enhanced bank capital requirements by requiring higher minimum capital ratios and improvements to the quality of regulatory capital. These reforms also introduced a comprehensive capital buffer framework to increase shock absorption capacity, as well as more stringent leverage and liquidity standards to strengthen overall banking sector resilience. These

³ We include private equity portfolio companies as part of the real economy for this purpose.

⁴ [Bank of England – non-bank risks, financial stability and the role of private credit](#) - speech by Lee Foulger, January 2024.

⁵ Deloitte Private Debt Tracker Spring 2025.

⁶ [UK Public and Private Markets report.pdf](#), see in particular sections 1.3 and 2.3.

⁷ [The-Growth-Trilogy-Paper-Two.pdf](#) describes the growth of UK’s venture debt market.

⁸ FSB [Global monitoring report on non-bank financial intermediation, 2024](#).

regulatory changes required banks to reduce their reliance on debt in favour of equity. BCBS assessment data⁹ indicates for every 1% increase in capital requirements, the price of credit rises 13bps across representative international banks. Between 2008 and 2014, the largest UK banks increased their Core Tier 1 (CET1) capital by approximately seven times¹⁰.

5. The growth of private credit can be attributed to regulatory-driven retrenchment by banks from certain lending activities¹¹. Bank of England data suggests that post-crisis UK banks reduced their lending most sharply in commercial real estate, followed by riskier corporate and SME loans, and then household secured lending¹². Private credit funds moved relatively swiftly to fill the corporate funding cap, in the form of direct lending as well as co-investment in bank-led leveraged finance.
6. Direct lending, meaning senior loans to sub-investment grade borrowers that are secured on the cashflows of the business (via a share pledge), is the largest asset class in private credit¹³. These instruments are bilateral, covenanted loans that are tailored to the borrower. Having been developed in large part to complement private equity (**PE**), credit funds take a similarly active approach to client management as their equity counterparts.
7. In the sponsor-backed middle-market (loans sub-c.£500m), direct lending deals outnumber bank-led deals. Industry research indicates that in 2023, private credit financed 68% of PE-backed companies, compared to 30% in 2016¹⁴. The benefits of private credit are also increasingly recognised by mid-market corporates for M&A and capital-intensive investments or to refinance bank-lending in over-levered or stressed situations. The UK and Ireland continue to be the most active markets for direct lending in Europe¹⁵.

⁹ From 2010 BCSB assessment of the long-term economic impact of stronger capital and liquidity requirements as referenced in the BCBS Working Paper 37 – The costs and benefits of bank capital – a review of the literature, June 2019.

¹⁰ Andrew Bailey: The capital adequacy of banks - today's issues and what we have learned from the past, speech delivered 10 July 2014.

¹¹ See Erel and Inozemtsev (2022), which links tighter bank regulation to growth in non-bank lending.

¹² The impact of capital requirements on bank lending” (2014).

¹³ According to Pemberton research, since 2020, direct lending's share of total capital raised for private debt strategies has risen from 42% for the period 2014–2018 to 55.7% for funds raised between 2019–2024.

¹⁴ See also Houlihan Lokey MidCaP Monitor Q2 2025 which notes that debt funds took 66% of deals during the period.

¹⁵ Octus Private Credit Origination Insights October 2025

8. Over the last decade, private credit lending has extended beyond PE-backed mid-market lending. Private credit now comprises a range of lending activities including distressed (special situations), real estate, mezzanine and venture debt¹⁶. Some funds pursue a range of investment strategies, others are focussed on a single niche. Capacity has also increased significantly. The emergence of ‘super-funds’, able to offer facilities in much larger size which compete more directly with the bank-led syndicated loan (**BSL**) product is a significant evolution in private credit. There are multiple examples of private credit transactions (both sponsor-backed and corporate) in the £1bn+ bracket¹⁷, rising to the multi-billions for corporate borrowers. The largest deals of 2025 include Apollo’s £4.5bn debt facility to EDF to support UK projects in June. In the US, deals are even larger, for example, Apollo and Blackstone’s US\$4bn private credit facility for the acquisition of Boeing’s digital aviation unit and Meta is reportedly in talks with private credit firms regarding approximately US\$29bn in funding for AI data centres.

9. A recently-published FMSB report on the Future of Financial Markets¹⁸ (to which the LMA contributed) highlights the increasing depth of private credit including its expansion into corporate lending: *“Private credit is increasingly executing transactions once reserved for syndicated lending...While their focus remains on bespoke, high-yield opportunities (e.g. 70% of LBO transactions in 2024), private credit has become a more mainstream alternative to bank lending. In 2024, 71% of corporate treasurers reported difficulty accessing bank financing, with over half turning to private equity or private credit¹⁹. As a result, assets under management in the private credit market have roughly tripled in the last decade²⁰.”*

10. Private credit is also expanding in range, beyond direct lending and acquisition finance. Several private credit funds have launched asset-based financing (**ABF**) or asset-based loan (**ABL**) strategies with dedicated funds, others have partnered with or purchased ABF/ABL portfolios from other financial institutions. Driven by investor demand for yield, particular areas of focus include those with higher-risk-adjusted yields such as aircraft and equipment leasing. Demand for well-collateralised longer-tenor investment has led private credit into project and infrastructure finance (tending towards longer hold durations), digital infrastructure (data centres) and

¹⁶[Pemberton European Direct Lending Report 2025](#)

¹⁷ [PitchBook](#) data indicates that in 2024 around 20% of European Direct Lending Deals were “jumbo” deals (€1bn or more).

¹⁸ MSB-Future-of-Financial-Markets_Final_220925.pdf.

¹⁹ Maher, Woolard et al., Regulatory focus on non-bank finance: considerations for financial services providers, 2025

²⁰ Preqin database, 2025

higher risk commercial real estate (**CRE**). At present, activity in these areas is relatively nascent in Europe, but growth is apparent and this is a trend that has been maturing for some time in US.²¹

11. While the post-2008 reforms to banking regulation are the key contributor to the growth of private credit, there are other factors that have contributed. On the demand side, private credit offers a number of benefits to borrowers; these are discussed in our response to Q8 below, including the now-proven resilience of the market to macro-economic and geopolitical shocks. As already noted, it was during the constrained funding conditions that followed the 2008 financial crisis, that private credit started to gather momentum, in particular in support of mid-market players. Private credit pursued a similar opportunity in mid-2022 through to 2023, when the bank market was impacted by volatility and rapidly rising interest rates: *“for a spell in mid-2022 private credit was financing nearly all new deals²²”*.

12. On the supply-side, the search for yield alongside well-collateralised assets and long tenors continues to attract institutional capital from an increasingly broad range of investors. The influx of institutional capital into direct lending funds in search of higher yield during the period of post-2008 low interest rates bolstered AUM and the availability of private credit significantly. Direct lending is predominantly, like syndicated loans, a floating rate product. According to research by Pemberton²³ published in May 2025, European direct lending in the €25m – €300m range is priced between 4.5% and 8% above risk free rates and in the years in the COVID-19 pandemic, *“the direct lending market has consistently delivered a 200-300bps premium above the syndicated market”*.

13. This has created a track record for direct lending which has supported investor demand as interest rates have normalised. Asset managers have increased their allocations, and fund managers have continued to innovate in response to the demand for yield, diversifying their strategies and fund structures beyond the traditional close-ended limited partner (**LP**)/general partner (**GP**) structure. The FMSB summarises the position as follows: *“The private credit market has also diversified in its sources of capital and deployment strategies, reducing liquidity mismatch risk and extending reach. Large firms are now underwriting transactions at*

²¹ [Oliver Wyman, Private Credit's Next Act – Why private credit is tapping into asset-based lending 2024](#) – see also Prequin survey - Investor Outlook: H2 2025 – 60% of investors considered ABL to present the best opportunities over the next 12 months.

²² Pitchbook article, 11 August 2022.

²³ [Pemberton Direct Lending Report 2025](#)

scales traditionally reserved for the syndicated bank market²⁴, while smaller managers continue to operate in higher-risk, higher-yield segments of the market. Insurers, which have very long-term horizons, have become a large source of capital which serves to reduce costs for this sub-sector. Private wealth has also become an increasingly important source of funding, accounting for 12% of assets for major managers, and more than doubling in the last three years²⁵. The rise of evergreen funds, which are open-ended vehicles offering periodic liquidity, has further supported growth. As a result, ‘dry powder’ in the sector has grown fourfold since 2014, enhancing market depth and increasing the influence of private credit, but potentially also introducing new, less transparent sources of financial risk²⁶”. The nature and implications of these developments are discussed in our response to Q3 below.

Question 2: What interconnections exist between the UK's banking sector and private markets? How have these interconnections changed since 2008, and how do you expect them to continue to develop?

14. The distinction between the public and the private markets is not binary²⁷; there are a number of areas where public and private are collaborating for mutual benefit and there are also areas where the public and private markets compete. (While noting the entirety of the loan market is private, in this context we adopt the terminology of the Inquiry, which assumes BSL, and bank-led products are part of the public market.)
15. Our response to this question discusses four key points of interconnection between UK banks and private credit funds which involve the loan markets: co-investment in PE-backed corporates, bank-provided fund finance, capital management structures (securitisations) and the secondary trading of private credit assets²⁸.
16. We would highlight that some of the interconnections discussed in this section (private credit CLOs and the secondary market) are only just started to develop in Europe. Further development is dependent on a range of factors including the further development of the regulatory environment.

²⁴ For example, Apollo's £4.5 billion facility to EDF to finance the UK's Hinkley Point nuclear power plant

²⁵ Oliver Wyman, Private credit is reshaping wealth portfolios, 2025

²⁶ Federal Reserve, Private credit: characteristics and risks, 2024

²⁷ [Shining a light on private markets | FCA](#)

²⁸ Noting that the full range of interconnections extends beyond loan activities – see [Financial Stability Report - July 2025](#) at section 5.3 and see also Box E, Figure A for a holistic map of the economic linkages between private markets and the broader financial system.

Co-investment in PE portfolio companies

17. Private credit (for the most part²⁹) is unable to provide working capital and ancillary facilities, meaning that in all direct lending transactions, the capital structure will feature a bank-provided revolving credit facility (**RCF**), typically afforded a super senior claim on the transaction collateral, with the relative rights of the RCF lenders and the private fund term lenders governed by an intercreditor agreement. Private funds are also unable to provide other banking services such as letters of credit, cash management and pooling services, deposit accounts, derivatives and foreign exchange, which must be provided by banks.
18. Banks and private credit funds may also co-invest in secured leveraged term debt, with private credit often providing mezzanine or other subordinated facilities to increase leverage. Market reports suggest that the number of deals involving bank-led senior debt and fund-led junior instruments is increasing³⁰.
19. The growth of private credit and the co-investment model that is necessary to provide PE portfolio companies with banking services has led a number of banks to enter formal partnerships with private credit funds, often in pursuit of global strategies³¹. For private capital funds with significant dry powder, a bank partnership provides access to additional deal flow through their client network. Relationships with established banks may also offer benefits to the private credit fund in terms of enhanced credibility. For banks, partnership with private credit enhances the distribution of their product and enables them to retain client relationships and a role in financing structures without tying up their own balance sheets.
20. Some banks have chosen to establish their own private credit platforms through their asset management arms to compete with private credit funds and penetrate the middle market where private credit has flourished³². Whether a bank chooses to

²⁹ A few private credit managers are understood to have developed working capital and cash management products but they are not prevalent in the market, certainly in the UK.

³⁰ Deloitte Private Debt Tracker Spring 2025 notes examples of issuers that have implemented this strategy including the UK-based education provider Nord Anglia.

³¹ For example, Lloyds Bank has joined forces with Oaktree Capital to provide support to UK middle-market PE-backed deals and Barclays has an exclusive cooperation with AGL Credit Management. BNP Paribas is involved in several partnership initiatives – in 2024 it partnered with Apollo's ATLAS SP and in May 2025 BNP Paribas Asset Management announced a long-term partnership with Scottish Widows to structure and manage a UK domiciled LTAF providing access to private markets for Defined Contribution pension scheme savers. In North America Citigroup has partnered with Apollo to provide US\$25 billion of debt opportunities over the next several years and in May 2025 UBS announced a strategic partnership with General Atlantic in North America and Western Europe.

³² HSBC Asset Management's private credit platform was launched in 2018 and has since expanded. Earlier this year it announced an intention to deploy a further US\$4 billion into the division's alternative credit funds, with the aim of attracting additional external investor money to build a US\$50 billion credit fund over the next 5 years. Another example is SMBC which launched its

compete or collaborate depends on its strategic position, size (with larger banks more likely to seek to establish their own platform) and product offering. There are also examples of institutions which operate both models³³. UK banks have taken a range of approaches.

21. Competition between banks and private credit has increased as the quantum of debt private funds are able to support has increased (as noted above). Borrowers seeking debt in sufficient size may seek bids from both banks and private credit when fundraising, often engaging debt advisors to support this process, exploiting a similar competitive dynamic that exists between the BSL and the high yield bond market. This has been apparent more recently as borrowers in the upper mid-market have sought to refinance the direct lending they relied on between 2021 and 2023³⁴.

Fund finance

22. The growth of private markets has brought with it increased demand from PE and credit funds for liquidity support from the banking sector. This support typically takes the form of either subscription lines, Net Asset Value (**NAV**) facilities or hybrid facilities which combine the two.
23. Subscription lines are short-term revolving credit facilities secured against the uncalled capital commitments of the borrower fund's LPs. Subscription lines account for the vast majority of fund finance and are principally an administrative tool for cash management. The proceeds are used to bridge the gap between transaction close and capital calls, manage cash flows, and execute investments without immediate recourse to investors. This supports smooth deal execution and for investors, facilitates smoother cash flows and allows for fewer capital calls.
24. Subscription lines are typically collateralised with high quality commitments from institutional investors. Subscription lines are also contractually limited, transparent to investors and subject to rigorous underwriting standards; derogations from an investor's obligation to fund on request (if any), and the credit quality of those investors, will themselves be the subject of extensive diligence and a key focus of the bank's underwriting process. Some banks have securitised subscription line lending commitments into collateralised fund obligations (**CFOs**). These structures

European private credit fund in 2024 with group company Sumitomo Mitsui DS Asset Management Co., Ltd participating in the fund as an LP investor, with plans to develop investment products for investors both in Japan and abroad.

³³ For example, JP Morgan Asset Management launched a major expansion of its private credit platform in 2021, then in 2024 allocated US\$10 billion to a partnership with FS Investments, Cliffwater and Shenkman Capital Management, with a further US\$50 billion added in early 2025

³⁴ Deloitte private debt deal tracker Spring 2025.

are themselves diligenced and rated by credit rating agencies, and allow alternative sources of high-quality capital, including insurance and pension capital, to reduce the securitising bank's underlying credit exposure. Collateralisation and credit monitoring, whether or not the exposure is ultimately securitised, are key to risk management in this area.

25. NAV lines are, in essence, borrowings secured against the NAV of the fund's assets. NAV financing represents a smaller portion of the fund finance market³⁵ but the popularity of these facilities has increased in light of the more challenging exit environment for PE. NAV financing provides liquidity for follow-on investments, distributions, or portfolio rebalancing, enabling funds to monetise existing assets³⁶. NAV financing is typically well-collateralised. Loan to value ratios are conservative (up to around 60%, more typically, between 10-30%) and documentation permits close levels of monitoring and oversight.³⁷
26. Hybrid facilities combine elements of both subscription and NAV facilities, allowing funds to access financing based on a broader security base. These structures can be useful for funds transitioning from an investment period, where uncalled capital may be diminishing, to a more mature phase where portfolio assets are generating value.
27. The LMA's Fund Finance Survey³⁸, published in conjunction with Drawdown, contains detailed data on 2024 origination volumes and key trends, which illustrate a healthy and growing market; *"pricing is down across most products; there has been an influx of new lenders and advisers; product innovation abounds; and the competition for talent is increasing"*. Fund finance is provided predominantly (90+%) by banks, although some alternative lenders (asset managers, insurance companies and bond finance) are starting to emerge³⁹. UK banks active in the market include HSBC (via HSBC NAV Financing Partnership Fund), Barclays and Lloyds.
28. We note the work of PRA in this area through its thematic review of private equity-related activities and the publication of its [Dear CRO letter](#) in April 2024. This review focussed on the adequacy of banks' risk management frameworks governing

³⁵ S&P Global estimated market size at \$150bn in 2024.

³⁶ See [Financial Stability Report - July 2025](#), Box E.

³⁷ [ILPA-Guidance-on-NAV-Facilities-2024.pdf](#)

³⁸ [LMA_FFIS_Apr-2025_v3.1_BOOK_.pdf](#)

³⁹ Financing the Economy 2024, Alternative Credit Council/EY see Figure 34.

fund finance and related derivatives exposures and made a number of recommendations to ensure a comprehensive and robust approach to risk management.

Private credit CLOs

29. Collateralised loan obligation (**CLO**) structures are well established as a means of securitising loan exposures. Assets (rated leveraged loans) are pooled in a special purpose vehicle (**SPV**), isolating assets from the originator. The SPV will then issue tranches of securities backed by loans in the pool. CLOs are widely used by large international banks⁴⁰ to manage their direct credit exposure on originations, motivated by demand from institutional investors for the higher yielding tranches.
30. While most CLOs focus on bank-originated loans, private credit funds are starting to look to CLOs as a means of financing their portfolios. Private credit CLOs have experienced significant growth in the US and are starting to emerge in Europe. This provides another point of interconnection between banks and private credit. Banks typically take on arranger roles in CLO structures as well as actively trading CLO tranches in the secondary market, to provide liquidity and pricing efficiency. Banks also offer financing solutions (repo agreements or credit lines) to investors acquiring CLO tranches.
31. The US private credit CLO market reached record issuance levels in 2024 (US\$41.77 billion, representing 19.6% of total CLO issuance), which has continued into 2025⁴¹. In Europe, we are only aware of two private credit CLOs to date. Barings launched the first European middle market private credit CLO (€380 million) in November 2024, followed by Ares Management Corporation's European Direct Lending CLO (£305 million) in June 2025.
32. The development of a CLO product for private credit is a factor that could further support the growth of private credit in the UK and in Europe. However, it is currently anticipated that the pace of growth is likely to be more gradual than has been the case in the US. The depth and homogeneity of the asset pool is a factor given the costs of establishing and maintain a CLO structure and related ratings (the US market being larger, more mature and the loans more standardised). The regulatory

⁴⁰ UK-based examples include Barclays, HSBC and Lloyds Bank.

⁴¹ [Octus - Intel - CLO Coverage](#) - "Octus Report on Private Credit CLO Market Sees Wave of Structural Innovations Amid Explosive Growth – July 2025. Apollo Debt Solutions, HIG Whitehorse and Kohlberg and Co. have all launched new private credit CLO shelves recently.

framework for securitisations both in the UK and in the EU, notwithstanding more recent adjustments and proposed adjustments⁴², are expected to continue to place greater regulatory constraints around securitisation than applicable to US structures. There are also investor constraints stemming from regulation (higher capital charges apply to insurance company investors under Solvency II rules).

Significant Risk Transfers (SRT)

33. An SRT structure involves the tranching the credit risk of a bank's assets into senior and subordinated layers. The bank retains the senior tranche, with the higher risk subordinated tranches being sold to sophisticated investors. It is a type of securitisation and so is subject to the due diligence, transparency and disclosure and risk retention requirements of the UK and EU securitisation regulatory regimes. However, SRT differs in a number of respects from traditional CLOs.
34. SRT transactions involve a transfer of credit risk only in relation to the asset pool rather than a true sale; the assets themselves remain on the bank's balance sheet, reflecting that SRT is a capital management tool. Banks continue to maintain the loan relationships and do not usually trade out of the initial loans after the initial risk transfer (CLO portfolios are normally actively traded by the manager).
35. SRTs are also more complex than CLOs. SRTs tend to be bespoke arrangements crafted around the relevant asset pool and regulatory requirements and SRTs are usually synthetic rather than cash structures. In Europe SRT normally involve risk in the pool being transferred to an SPV via a credit default swap and the SPV issuing credit-linked notes (CLN) to investors⁴³.
36. The number of investors in an SRT varies. Deals can be bilateral, clubbed or more broadly spread, but the nature of the instrument investor base is generally more limited and specialised.
37. Private credit funds have emerged as a key investor in SRT⁴⁴. SRT is used by banks to reduce their exposure to a range of asset classes, including investment-grade corporate loans, SME lending, commercial real estate, infrastructure, and project finance. The key motivation for private credit investment in SRT is the opportunity to

⁴² See [The New Securitisation Framework: what has really changed?](#) and [EU Securitisation Framework: Regulatory Update](#)

⁴³ An alternative structure, common in the US and starting to be used in Europe involves the bank issuing the CLN directly to the investor with an embedded CDS (so investors' credit risk is on the bank). For the bank this mitigates counterparty risk on the third party collateral holder.

⁴⁴ As reported by several market players, including TwentyFour Asset Management

gain exposure to a range of asset classes that may be more difficult for credit funds to access directly, and without the operational demands of loan servicing or origination.

38. The banks' motivation for SRT is capital management; it is used to achieve capital relief or address portfolio concentration issues. SRT transaction began to emerge 2016 in the UK and in Europe in anticipation of the implementation of, the Basel 3.1 output floor. More recent growth has been driven by US banks starting to issue in size following clarificatory guidance from the Federal Reserve in 2022 on the application of Regulation Q (the primary regulation governing the framework for securitisation and capital relief in the US)⁴⁵.

Secondary trading of private credit debt

39. The secondary market in private credit involves banks taking on the role of facilitator for the buying and selling of existing private credit loan exposures. The process is somewhat similar to the trading of syndicated loans.

40. Secondary trading can be LP or GP led. An LP-led transaction involves the sale of an LP's interest in a private credit fund (typically holding a portfolio of private credit loans) to another LP. A GP-led transaction, aimed at refinancing the portfolio, may involve changes at loan level (changes to the lender of record), but more often involves movement of the portfolio into a continuation vehicle.

41. Secondary trading activity is currently mostly apparent in the US. In May 2025, Apollo announced that it was joining forces with five banks, including JP Morgan and Goldman Sachs, to syndicate and trade investment-grade private debt on a wider scale, with the banks serving as broker-dealers. Press reports suggest funds including Ares Management and Collier Capital are also involved in private credit secondary market investment, but many more funds also exist plus Asset Owners also undertaking this activity directly.

42. Data on secondary trading in the UK and Europe appears not yet readily available. However, market commentary anticipates further growth in this practice as GPs look to initiate secondary transactions to restructure funds, extend fund life or satisfy the liquidity requirements of LPs.

⁴⁵ [International Monetary Fund - Recycling Risk: Synthetic Risk Transfers](#) WP/25/200 October 2025.

Question 3: What are the implications of the growth in private markets, and interconnections with the wider financial services sector, for lending to the real economy and the UK's financial stability?

Implications for lending to the real economy

43. The growth of private credit and its relationship with the banking sector has a number of direct and positive implications for lending to the real economy in terms of access to credit and the terms on which credit is available. Private market players are stepping in to bridge financing gaps in sectors less well-supported by banks. For larger PE-backed and corporate credits, the presence of alternatives to bank debt creates competitive tension that can positively impact the price and terms on which those borrowers are able to access debt funding. 2025 market data includes multiple examples of private credit deals being refinanced with BSLs with resultant downward pressure on private credit margins⁴⁶. See further our responses to Q1 and Q8.
44. The importance of private markets and the significant potential they have to drive innovation and economic growth was acknowledged by Sarah Pritchard (Deputy Chief Executive, FCA) in a speech in July 2025⁴⁷. The Chancellor of the Exchequer, Rachel Reeves, pointed to the potential benefits of the further development and engagement with private markets in her Mansion House speech in July⁴⁸. The same is apparent in the EU where the savings and investments union (SIU) initiative is aiming to mobilise savings towards SMEs and innovative companies that cannot easily access bank finance and in the US, which is expanding access to alternative investments through 401(k) retirement plans.
45. Fund structures are evolving to support the allocation of capital to private credit by a wider range of investors. Private credit funds typically constitute Alternative Investment Funds (**AIFs**), with the preferred vehicle of choice being a Luxembourg Alternative Investment Fund (**RAIF**)⁴⁹. These have traditionally adopted closed-ended fund (**CEF**) structures to match the long term and illiquid nature of their assets, similarly to PE funds. Investors invest in the AIF via LPs or listed closed-ended investment companies. More recently, fund structures have started to evolve

⁴⁶ Octus Private Credit Origination Insights October 2025

⁴⁷ [Shining a light on private markets | FCA](#)

⁴⁸ Noting the pledge of a majority of defined benefit pension funds having committed to the Mansion House Accord, to “invest at least 10% of their main funds into private assets such as infrastructure and growth markets...with at least half of that going into UK projects.”

⁴⁹ [Alternative Credit Council \(ACC\) & Alternative Investment Management Association \(AIMA\): Trends in Private Credit Fund Structuring 2025](#) – see p31.

to accommodate and attract demand from a wider range of investors requiring more flexible redemption options, with the launch of open-ended private credit funds⁵⁰.

46. In LP/GP structures, general partners (**GPs**) manage co-mingled funds on behalf of the LPs, who are long term institutional investors. The LPs contribute fixed amounts of capital. The typical investment period of a direct lending fund is 3-5 years, with a fund life of around 7-8 years, often with the ability to extend (with the consent of LPs) if conditions for liquidation are sub-optimal when the fund comes to the end of its original tenor. This means the fund never has to sell assets to meet redemptions, even in time of market stress, and fund managers do not have to preserve cash to cater for redemptions (although the fund manager must preserve cash to meet interest and debt obligations if the fund uses leverage). As a result, CEF structures mitigate run risk and liquidity risk, which is a key reason why private credit has proved resilient in times of market stress (and a key reason why private credit represents a much less material systemic risk than traditional bank lending, see further Q5 below).
47. Open-ended funds use a number of different models, but all aim to facilitate more flexible investment strategies. These include “evergreen” funds which have no fixed end date and are designed to recycle capital on a continuous basis. The duration mismatch in an open-ended fund which invest in longer tenor and illiquid assets is managed via fund financing and the maintenance of cash buffers.
48. The EU’s Long Term Investment Fund (**ELTIF**) and the UK’s Long-Term Asset Fund (**LTAf**) are both open-ended fund structures that support investment in long-term, illiquid assets and are being used for private credit. In the last month alone, Blackstone, Apollo, and Schroeders have each announced the launch of Euro ELTIFs; in April 2025 Partners Group announced its first private credit focused LTAf; and in March 2025 both M&G and Aegon Asset Management received regulatory approval from the FCA to launch their first private credit LTAfs. Private credit ETFs (and public/private ETFs) are also beginning to emerge. These funds attract a wider range of investors than closed-ended funds, including private wealth, family offices and also, retail.
49. While these newer vehicles broaden investor access to loan exposures, as the FMSB notes, *“they raise potential conduct risks, as managers are responsible for valuing illiquid assets without the transparency of public markets. The inclusion of private*

⁵⁰ Ibid.

credit in retirement vehicles such as pension funds and 401(k) plans may further increase the real world consequences of market stress in this asset class⁵¹”.

50. We note that the US opened the private debt market to retail investors in the 1980s with the launch of the SEC-regulated, listed Business Development Company (**BDC**). BDCs were created to provide investors with greater fund liquidity and transparency combined with exposure to SMEs. They are SEC-regulated and usually publicly traded. BDCs include redemption caps to limit liquidity risk and are subject to disclosure requirements and a leverage (debt to equity) limit of 2:1. Many private credit firms operate BDCs in the US, which account for c. \$300bn AUM⁵².

51. Co-investment by banks and private credit in lending transactions can have similarly direct and positive impacts for lending to the real economy. The implications of other sources of interconnection (see response to Q2 above), being mostly designed to improve capital efficiency and liquidity, are indirect in the sense of contributing to the availability and cost of credit. For example, as described in Q2 above, SRTs can be highly beneficial for effective bank operations, making an important contribution to capital management and to addressing portfolio concentration issues.

Implications for financial stability

52. Private credit loans are largely bilateral, covenanted and not traded. Credit relationships are closely monitored and credit terms permit early intervention. Concern has been expressed that increased competition between private credit and BSL could lead to a loosening of underwriting standards and a shift towards riskier borrowers and structures. Overall, historic default rates remain relatively low⁵³.

53. Closed-ended fund structures, as already noted, do not create investor redemption pressures, do not need to be marked to market and more generally, the predominant sources of capital are long term (insurance companies and pension funds). The open-ended structures that have emerged more recently might be viewed as having the potential to create structural vulnerability if redemption demands exceed available liquidity. However they remain the minority. A recent report into trends in private credit fund structuring⁵⁴ indicates that the majority of private credit AUM continues to be managed through closed-ended structures. We would also observe

⁵¹ [FMSB-Future-of-Financial-Markets_Final_220925.pdf](#)

⁵² Moody's – Private Credit and systemic risk June 2025

⁵³ [How bad could private credit default rates get?](#)

⁵⁴ [ACC & AIMA: Trends in Private Credit Fund Structuring 2025](#)

that the implementation of AIFMD 2 in April 2026 offers some risk mitigation as Loan Originating AIF managers must be closed-ended funds, unless the manager can demonstrate that the AIF's liquidity risk management system is compatible with its investment strategy and redemption policy. On that basis, the ability of private credit to impact financial stability or cause wider systemic risk might be thought to be relatively limited.

54. Leverage in private funds (whether open or closed-ended) is also relatively limited. AIFMD places regulatory limits on leverage and fund finance facilities (see response to Q2 above) are typically well collateralised and subject to robust governance. Fund finance mostly takes the form of bank loans (as opposed to e.g. repos or derivatives) which incorporate a range of risk controls including covenants, limits, thresholds and reporting requirements. Research by Deloitte suggests fund finance can be viewed as *“a lower risk form of lending for banks compared to lending to the underlying borrowers directly. The seniority and significant overcollateralization of their positions means there is a significant financial cushion that must be depleted before they are exposed to any risk of losses. Borrowing facilities are also normally arranged to match the profile of the assets and reduce liquidity mismatches.”*⁵⁵

55. We note that some commentators have suggested that private credit is not immune from market dynamics. While closed-ended funds (and properly structured and managed open-ended funds) may not realise losses immediately in a stressed market, a swing in market sentiment (concerns about defaults within a portfolio) may have broader implications in terms of investors reallocating assets (with knock-on effects in terms of margin calls). However, these comments were made in the context of the much larger US market⁵⁶.

Question 4: How transparent are the valuations, price discovery mechanisms, and structure of ownership of assets adopted by private markets? Does the Bank of England have sufficient visibility in non-bank finance, and what changes, if any, should be made to address this?

56. As a general comment, we would observe that to maintain the UK's position as a key hub for private credit in Europe and recognising that private capital is an important component of the landscape, the regulatory framework must remain proportionate, and activity based.

⁵⁵ Deloitte private debt tracker Spring 2025

⁵⁶ Moody's – Private Credit and systemic risk June 2025

57. UK regulators currently have considerable transparency from reporting by regulated asset managers and there is currently active supervisory engagement on valuation practices in the private markets and the adequacy of existing regulatory requirements. Private credit fund managers who are also UK AIFMs are already bound by AIFMD-derived rules (e.g. in FUND in the FCA Handbook, particularly FUND 3.9) which focus on the ‘behaviour’ of fund managers (GPs) setting out rules on transparency, risk management and investor protection including requirements for the proper, independent valuation of assets.
58. The FCA recently visited a number of private credit firms to probe their risk management, valuations, governance, and conflicts, as part of a review of private market valuation processes. The FCA’s findings overall were positive, reporting many examples of good practice in valuation processes, including quality reporting to investors, using third-party valuation advisers to introduce additional independence and expertise, and consistent application of established valuation methodologies.
59. This is supported by market research. A report by the ACC and EY⁵⁷ notes that private credit investors receive monthly reports in most cases containing detailed data, which contrasts favourably with the quarterly reporting that is the norm in sub-investment grade lending. Further, transparency is taken seriously by institutional investors and is a key consideration in asset allocations. According to this research, LPs are spending more time assessing managers’ valuation processes as part of initial and ongoing due diligence. 90% of respondents reported valuing loans quarterly or more frequently, with the majority use external valuation expertise to cross-check internal valuations and report to investors. Investors in private credit may therefore have greater insight into health and performance of borrowers in the portfolio than would be the case for participants in a BSL, where quarterly reporting is the norm.
60. We would also note that while private markets are inherently less transparent than public markets, there are a wide range of commercial providers such as Bloomberg, Prequin, Octus, CreditSights, Debtwire, Houlihan Lokey, Deloitte, Pemberton and others, that publish a significant amount of data regarding private credit specifically.
61. The growth of NAV financing to private credit funds, which are themselves often regulated entities with consequent transparency and reporting obligations, contributes further to transparency. Under the covenants found in typical NAV loans, lenders receive regular valuations and fund performance data; in some cases these lenders will also reserve a right to interrogate the basis of those valuations, or obtain

⁵⁷ [ACC and EY Report: Financing the Economy: The Future of Private Credit](#)

additional independent valuations, if they have grounds to disagree with them or in a stressed scenario. If a NAV loan is itself syndicated or securitised, this data is scrutinised closely by a further range of sophisticated investors. All this provides additional regular scrutiny and transparency on a private credit fund's performance.

62. The FCA's review did identify areas of improvement with a need for consistency being a key theme. According to the FCA report⁵⁸, valuations should prescribe a valuation methodology for each asset class setting out the rationale and limitations of each methodology, describe how valuation inputs are sourced and benchmarked, describe how value movements are documented, and prescribe the triggers and thresholds for an ad hoc valuation. We understand that this will shape the FCA's approach to AIFMD II and will inform the FCA's contribution to IOSCO's review of global valuation standards to support the use of proportionate and consistent valuation standards globally in private markets. With regard to the emphasis on consistency specifically, we would note that this may be challenging across increasingly varied credit portfolios, where sponsors value flexibility and the need to meet investor expectations.
63. AIFMD II (due to be implemented in April 2026) will introduce enhanced supervisory reporting, especially for loan-originating AIFs, including on the volume and nature of loans, details of valuation methodologies used and loan performance metrics. This is likely to improve regulators' general visibility over the private credit market and may offer a partial solution to any concerns about hidden leverage, illiquidity, and systemic risk.
64. There is wide discrepancy between jurisdictions in terms of both the regulatory framework and transparency requirements and practices. As private credit funds tend to deploy capital on a cross-border basis, some market commentary has highlighted that regulators may not have sufficiently holistic view, which potentially limits the usefulness of UK data for financial stability monitoring purposes. This was also apparent in the FSB's recommendations with regard to leverage in private markets which highlight that available data is fragmented across jurisdictions and not always comparable. Improving convergence in reporting standards and data exchange between regulators may be a more important area of focus than increasing the amount of data provided by locally established firms⁵⁹.

⁵⁸ [FCA report on private market valuation practices](#)

⁵⁹ [ACC and EY Report: Financing the Economy: The Future of Private Credit](#)

Question 5: Are there systemic risks that the Bank of England should be aware of regarding non-bank financial intermediation? If so, how can these risks be mitigated?

65. The Bank of England and the bank trade associations are better placed to contribute on questions of systemic risk. However, we refer to our response to Q2 and Q4 above which highlight that the structure of many private funds limits the potential for contagion and systemic risk and that where interconnections with the banking sector exist, they are generally well collateralised and monitored.

Question 6: How has demand for finance from businesses changed since 2008, and how do you expect this will develop?

66. Prior to 2008, most UK businesses relied on bank lending to meet their debt finance needs and only larger companies accessed the syndicated loan and debt capital markets. As outlined in our response to Q1, the majority of long-term lending to mid market companies is now provided by debt funds and businesses of all sizes have become used to a broader array of funding options, but are also aware that there are certain services that can only be provided by banks.

67. This more diverse and competitive funding environment as noted in our response to is benefitting borrowers. Larger players (both PE and corporates) are alive to the benefits of trade-off, whether in terms of improving the debt package or locking in refinancing in volatile market conditions. A number of 2024 refinancings illustrated how borrowers can capitalise on heightened competition and the expiry of non-call periods to refinance at lower margins. A Deloitte report notes: *“This environment drove private debt players to proactively reprice facilities to defend market share, ultimately benefitting issuers with margin reductions exceeding 100 basis points in some instances⁶⁰.”*

68. The now well-established position of private credit in the funding landscape would suggest an expectation of growth at least in line with overall lending volumes. This is reinforced by official and market data which suggest that both the supply and demand for private credit will continue to grow. In the UK specifically, the Government’s desire to drive institutional capital (in particular from pension funds) into strategically important and priority growth industries is apparent.

69. The prospect of rising interest rates and/or tightening credit conditions are a key reason why companies seek to diversify their capital structure. PE-portfolio

⁶⁰ Deloitte private debt tracker Spring 2025

companies turned to private credit following the GFC. Many corporates, instead looked to place debt directly with institutional investors. The largest source of private placement debt for UK companies is the US Private Placement (USPP) market. Financed by US insurance companies, USPP is a well-established fixed rate loan product with standardised documentation and an internal rating system. The existence of this ratings system is a key differentiator from direct lending, which is generally not rated and thus subject to bank-like credit analysis.

70. USPP investors can lend cross-border in a range of currencies on terms very similar to bank debt. While also open to sub-investment grade issuers on a secured basis (and in that sense overlapping with the territory of direct lending funds), UK investment grade companies have become significant users of this market. In 2024, the market recorded a record US\$157 billion in new issuance (up from US\$100 billion in 2019 and approximately just US\$40 billion in 2010). UK companies were a significant contributor to that total, representing between 8-10%⁶¹.

71. Outside USPP, the private placement market for European companies is fragmented and, with the notable exception of the Schuldschiene market in Germany suffers from a lack of standardisation. Schuldschiene is used by some non-German companies, including a few UK companies but is much less prevalent than USPP.

72. See our response to Q8 below which further considers the competitive advantages of private credit.

Question 7: How has the regulation of bank capital and liquidity requirements affected the ability and willingness of banks to provide lending to the real economy? Are there disincentives in regulation that inhibit businesses' ability and willingness to access finance through banks?

73. See our response to Q1. With regard specifically to disincentives that inhibit business from accessing finance through banks, we would note that there are a range of factors that influence a borrower's choice of credit provider. Willingness to lend certainly, but on the assumption there is a choice, the cost of credit is typically the primary differentiator, which is a function of regulation.

74. In the context of banks' ability to support SME lending specifically it is worth noting the impact of the Basel III regulatory environment on the challenger banks that emerged in the wake of the financial crisis, firstly in the UK and then around the

⁶¹ [The Private Placement Monitor USPP League Tables 2025](#)

world⁶² which aimed specifically to improve competition in the banking sector. As the challenger banks have become more established, concerns have arisen about the disproportionate burden of the post-2008 framework on smaller institutions. Requiring smaller banks to hold significant loss-absorbing debt (Minimum Requirement for Own Funds and Eligible Liabilities (MREL)), as larger banks do, constraints the capital they can use to support SME lending. Evidence submitted by Allica Bank in 2023 to the House of Lords Financial Services Regulation Committee, estimated that MREL could reduce SME lending by £42 billion, or 20%, over five years⁶³.

Question 8: To what extent do private markets have a competitive advantage over the banking sector to provide finance to businesses; if so, why? To what extent are any competitive advantages regulatory in nature?

75. In our view private credit is complementary to bank lending. Private capital has stepped into areas that are less well serviced by banks subject to prudential regulation but has not displaced core banking activity. In that sense, its competitive advantages are regulatory in nature. Private markets are funding the growth of innovative businesses, including in technology and health care; to provide support for distressed borrowers who need access to higher leverage ratios and bespoke financing solutions in complex scenarios. However it is also important to recognise that the rise of private credit (and private equity) has also provided the banking sector with new opportunities (see response to Q2 above).

76. Private credit offers a number of advantages to borrowers. Key among these is resilience through market stress (and the ability to innovate and diversify in response to market stress), see our response to Q1 above. The “direct” nature of direct lending is also a key selling point. Private credit offers long term non-amortising loans with active ownership and board level engagement and often, sector expertise. The team are a “one-stop-shop” relationship over the life of the loan and can take a bespoke approach both to initial terms and to amendments. Private credit can offer debt across the capital structure (senior, second lien, unitranche, mezzanine and PIK). Funds are more agile and can complete credit processes more quickly than banks (usually). This speed of execution is an important advantage for PE sponsors in auction situations or running up against a refinancing deadline. Being private, the borrower may also experience a higher certainty of execution, via bilateral engagement with decision makers holding pen and paper on the loan document and not being at the mercy of capital markets.

⁶² Challenger banks include OakNorth, Shawbrook, Aldermore, Allica, Hampshire Trust Bank (HTB), Cambridge and Counties.

⁶³ See also [Allica Bank – Rebooting SME Finance report \(2025\).pdf](#)

77. The flexibility of private credit it brings with it higher pricing than banks are able to offer; but that may bring with it higher leverage. There may also be a saving in terms of transaction costs and (where private credit competes with BSL), as a result of there being no need for credit ratings.

78. There is growing alignment of covenant packages and documentation terms as a result of increased competition between BSL and private credit. However, bank-led BSLs overall tend to offer more flexible covenant packages (at the upper end and increasingly in the mid-market, BSLs are now “covenant-lite”).

Question 9: *What, if any, reforms to bank capital regulation could be implemented to increase the risk appetite of the banking sector to provide lending to the real economy?*

79. The bank trade associations are better placed to respond to this question.

Question 10: *What can the UK learn from other jurisdictions, in particular the US and the EU?*

80. The UK’s regulatory regime must remain internationally competitive. Other jurisdictions are modernising their frameworks to better accommodate and attract private capital through the adoption of regulatory requirements that are proportionate. The approach of regulators in both the US and the EU to regulatory oversight of the private markets has been relatively light touch, acknowledging the increasingly important role of private credit in supporting the growth of the real economy. The conclusions emerging in the US and the EU following market consultation indicates growing recognition that overly prescriptive and burdensome regulatory intervention may hinder private markets fulfilling the role they have so successfully demonstrated in times of economic difficulty. Measures to date suggest an approach that values a balance between providing authorities privately with the essential information they need to carry out their supervisory roles and protecting sensitive investment strategy information.

81. In recent years the approach of EU policymakers and regulators has been relatively light touch, focusing on the soundness and adequacy of existing macroprudential policies to manage potential risks in the NBFIs sector and any spillover risks to the banking sector. In fact, the EU has been cautious to define new measures which could potentially put in place barriers to growth of this market segment. For EU policymakers, the growth of private credit has provided a welcome boost to the development of more active European capital markets and the savings and investment union, which is a key policy objective of the Capital Markets Union. They have also shown favour to non-EU private credit funds by the fact that they will not

be subject to new requirements under CRD VI which prohibit cross-border lending and the provision of other core banking services by non-EU credit institutions.

82. In recognising the private markets significant contribution to the economy policymakers and regulators have also kept the industry under review in recent years with a focus on disclosure, identifying conflicts of interest, transparency, valuations and retail protection. As a result, additional requirements will be imposed on managers of AIFs in April 2026 when AIFMD comes into force introducing expanded reporting and disclosure requirements.

83. In the US, deep and consistent allocations from pension funds, insurers and endowments have helped build large and long term pools of private capital. A policy environment that maintains a clear distinction between professional and retail markets, prioritises disclosure and outcomes over prescription and offers regulatory predictability has allowed private credit firms to invest at scale. The US private credit market is significantly larger and deeper than the EU and UK markets. Data published by the Bank of International Settlements in March 2025 indicates that more than 87% of private credit loans outstanding globally originated in the US compared to Europe at approximately 6% and the UK at approximately 3-4%.

84. The Federal Reserve and SEC, like the EU and the UK through have conducted reviews of the market and its interconnectedness with the more traditional banking system and continue to monitor it with a focus on transparency and disclosure.

Annex 1

LMA

Since our foundation, the LMA has supported the loan markets, with a focus on enhancing liquidity, transparency, and sustainability. Today, with 850+ members in 69 jurisdictions, we represent an ever-growing diversity of participants in international capital markets, including institutional investors, private and public sector issuers, banks, non-banks, technology solution platforms and market infrastructure providers, spanning the UK, US, EMEA, and Africa.

Through member representation on the LMA's various institutional committees and working groups, we actively engage with our members to ensure their voices are heard. Their input and guidance help shape the future of the loan markets, and these groups drive the delivery of positive outcomes.

Today, our activities are busier than ever, with a rapidly growing range of services offered to members. This includes an expanded library of documents, LMA Academy and training offerings, LMA Player and on-demand podcasts and webinars, increased focus on ESG and sustainability initiatives, and operational enhancements aimed at reducing settlement times.

Our goal remains to ensure the loan product retains its place as a critical financing tool in the market.

For more information, please visit our website: www.lma.eu.com