keynotes

presentations panels networking

associates





welcome

CCTA 2025 CONFERENCE

As Chair of the CCTA, I am delighted to welcome delegates to our Annual Conference in Manchester once again. To those who joined us for the member dinner last night, I hope you enjoyed reconnecting with colleagues across the industry and exchanging ideas and experiences.

Since our last conference, the consumer credit sector has continued to face a period of sustained regulatory change. A review of the Consumer Credit Act is now underway. Any changes to a 50-year-old piece of legislation will have an impact on the market and how we interact with our customers.

There's plenty happening elsewhere too, with a review of the Financial Ombudsman Service and mass redress events, the ongoing issue of motor finance commission complaints and Deferred Payment Credit (BNPL) also coming under FCA regulation next year.

Today's conference programme reflects these evolving dynamics, covering the most pressing issues for firms across the CCTA membership. There is no shortage of critical topics to explore.

We're proud to welcome a strong line-up of speakers - including organisations joining a CCTA event for the first time - who I know will bring insight and fresh perspectives to the day's discussions.

I'm also grateful, once again, to the Financial Conduct Authority and the Financial Ombudsman Service for their continued participation. Their presence is hugely important, giving members the chance to hear directly from the bodies shaping regulation and oversight in our sector.

I would also like to give a special thanks to HM Treasury for taking part in the conference for the first time. Is it invaluable for the Government to be engaging with the sector in this way.

The challenges facing our industry are clear. We continue to navigate through issues such as affordability and vulnerability. At the same time, the ongoing debate around credit access and financial inclusion remains vital - particularly for those consumers who would struggle without a well-functioning and sustainable credit market. These are the issues we will continue to champion and debate together.

Our aim for the day is to provide members with practical insight, meaningful discussion, and opportunities to connect - all to better equip firms to navigate the road ahead.

This conference wouldn't be possible without the support of our sponsors, and I extend my sincere thanks to them for their contribution. I encourage everyone attending to take time to visit the exhibition area during the breaks and learn more about the services and solutions available.

Finally, my thanks to the CCTA team for their hard work in making this event happen.

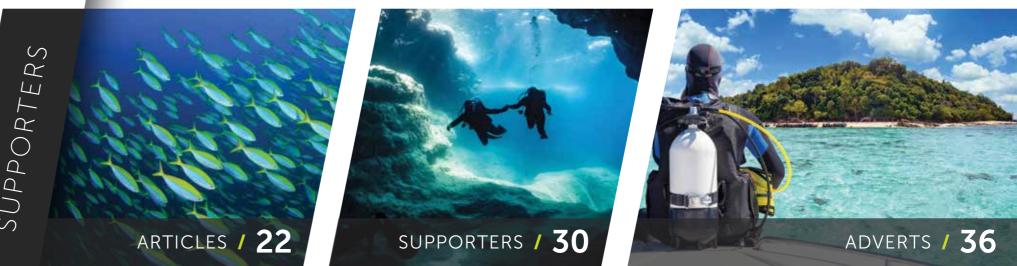
I look forward to catching up with many of you throughout the day.

Mark Fiander Chair, CCTA

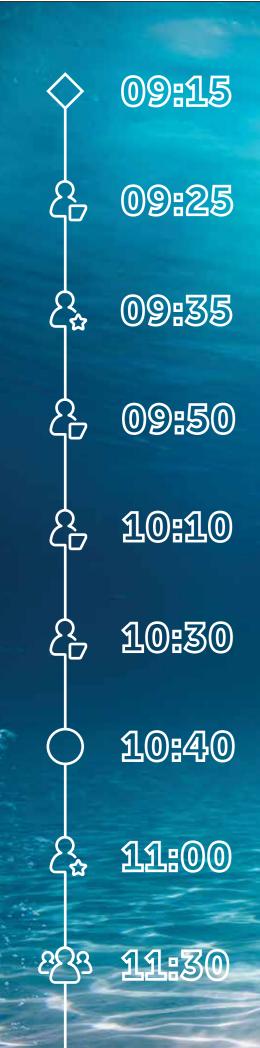








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WELCOME: CCTA
Event details & housekeeping
INTRODUCTION: CCTA Introduction from CCTA
KEYNOTE: Square 4 Assure 4:
Revolutionising outcomes testing with Al-enabled assurance
PRESENTATION: StepChange & Evlo StepChange and Evlo: A collaborative model for better outcomes
PRESENTATION: Plain Numbers Supercharge customer understanding: Make numbers your communication superpower
PRESENTATION: CCTA CCTA Academy: Update

Supercharge customer understanding:	
Make numbers your communication superpowe	r

ORNING BREAK

efreshments & networking ease be re-seated by 10:55

EYNOTE: FCA CA Update: our strategy and how it supports a well-functioning credit market

ANEL: Regulatory hanges ahead: Navigating regulatory developments

PRESENTATION: Equifax CATO unlocked:

Enhanced data for better decision making

NETWORKING LUNCH

Lunch sponsored by Acquired.com Please be re-seated by 13:30

KEYNOTE: HM Treasury **HM Treasury:** Update

PANEL: Technology & innovation

A new voyage: How data is helping firms innovate

KEYNOTE: Walker Morris Johnson, commissions and compliance: What firms should do next

AFTERNOON BREAK

Refreshments & networking

Please be re-seated for raffle draw by 14:55

PRESENTATION: Acquired.com & Moneyline

The future of recurring payments: How VRPs can improve collections

KEYNOTE: FOS

The Financial Ombudsman Service: Modernising the redress system

> **CLOSING: CCTA** Closing remarks from CCTA

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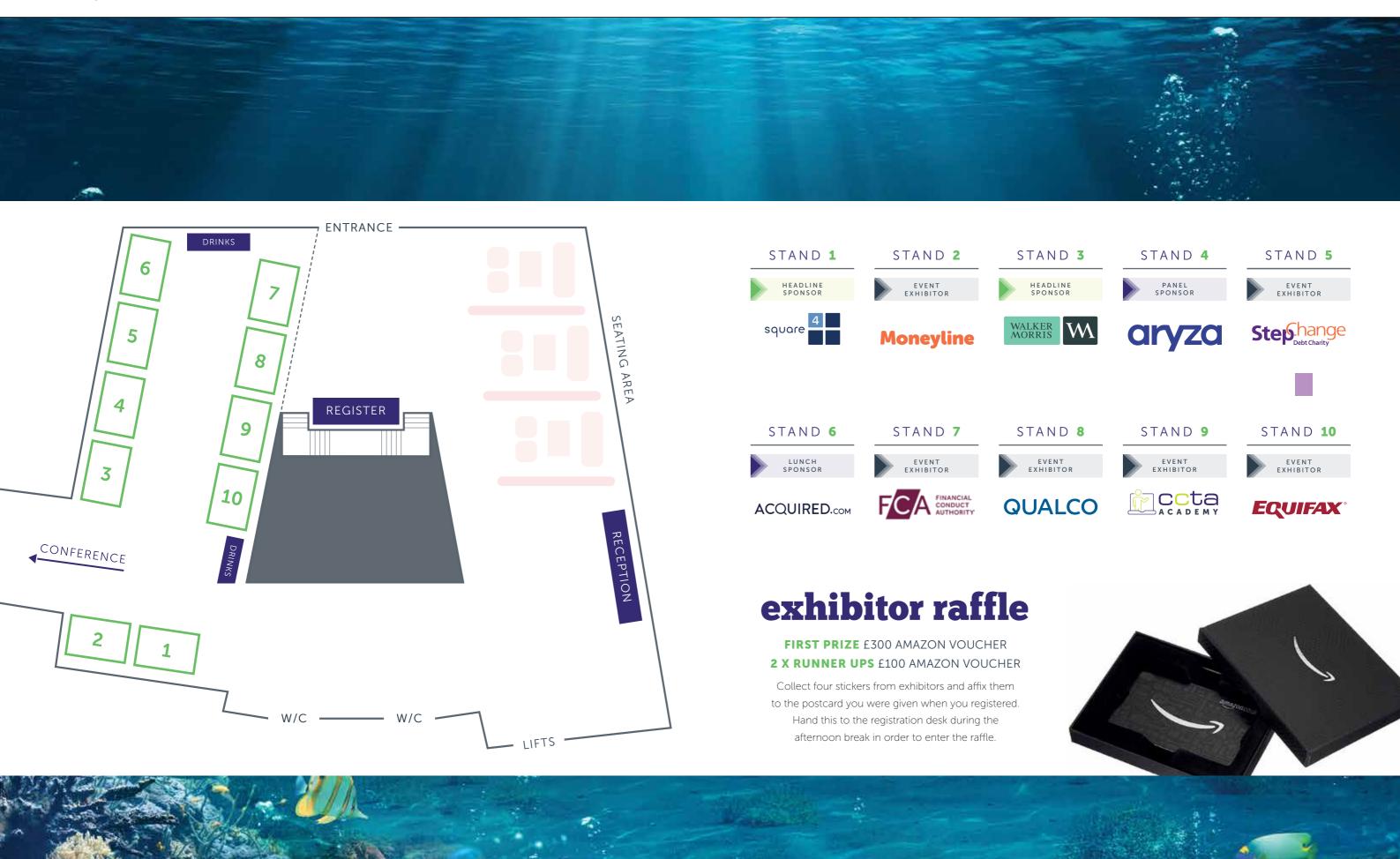
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06 | FLOOR PLAN













PRESENTATION

PRESENTATION

PRESENTATION

Assure 4: Revolutionising outcomes testing with Al-enabled assurance

The FCA's Consumer Duty requires firms to define, test, and evidence customer outcomes. Meeting this requirement demands a robust framework and reliable data, but traditional approaches are often complex, making it increasingly difficult for firms to achieve consistency and transparency.

Square 4 will explore how the use of AI can transform a firm's approach to outcomes testing by delivering more accurate, scalable, and real-time analysis of customer interactions and records. By automating repetitive testing, AI reduces operational costs and frees assurance teams from manual checking. This allows firms to focus on higher-value activities including using insights from poor outcomes, performing root cause analysis, and addressing underlying issues.

The result for firms is stronger regulatory compliance and a culture of continuous improvement that enhances customer outcomes, while enabling them to operate more efficiently and cost-effectively.

StepChange and Evlo: A collaborative model for better outcomes

StepChange and Evlo have come together in a new partnership that is already proving its value. By combining expertise and aligning resources, they've strengthened communication, reduced inefficiencies, and delivered faster, better outcomes for Evlo customers.

This collaboration shows what's possible when organisations work side by side - creating a model that benefits both partners and most importantly, supports people in financial difficulty.



Asif Nadeem
Chief Transformation Officer
Evlo

Supercharge customer understanding: Make numbers your communication superpower

The FCA's Consumer Duty explicitly recognises poor numeracy as a vulnerability – and references Plain Numbers as a solution.

Drawing on recent research on customers with low credit scores, Mike Ellicock, Chief Executive of Plain Numbers will highlight the extent to which customer understanding can increase once this hidden vulnerability is acknowledged and addressed.

In those independent randomised controlled trials, as in previous (and now subsequent) trials, the Plain Numbers Method has been shown to double the number of customers who understand - even within current regulatory requirements.

Mike will explain how specialist lenders can embed clearer number communication and thereby supercharge customer understanding to build trust, reduce risks, and unlock measurable business benefits.

CCTA Academy: Update

Launched in October 2023, CCTA Academy is the Association's online learning platform designed to meet the unique compliance training needs of the consumer credit sector. Developed to address the gap in high quality, sector-specific training, especially for smaller lenders, CCTA Academy offers modules on topics such as complaints handling, vulnerable customers, and the Consumer Duty. Accessible on-demand, it supports hybrid and remote workforces while helping firms meet FCA training and competency requirements.

Two key strengths set it apart: content shaped by CCTA's industry expertise and regulatory insights, and collaboration with partners such as the Illegal Money Lending Team.

CCTA Academy has seen remarkable growth. Initially targeting 100 users, we surpassed expectations by reaching over 1,000 users within the first year. In July, we opened the platform to non-members, reinforcing its role in raising compliance standards industry-wide.



Nicola Crump

Advisory Director

Square 4



Sara Dias-Foster
Business Development Manager
StepChange Debt Charity



Mike Ellicock
Chief Executive
Plain Numbers



Naveed Asif
Head of Policy & Advice
CCTA

















FCA Update: Our strategy and how it supports a well-functioning consumer credit market

Mark will provide insights about the FCA strategy, the FCA work that sits below it and what this might mean for your business.

This session will highlight some of the key work currently taking place within consumer finance. We will draw out how the FCA's work will contribute towards a thriving and innovative consumer credit market that supports economic growth and helps consumers navigate their financial lives in order that consumers, firms and the wider economy all gain.

CATO Unlocked:

Enhanced data for better decision making

In an ever-changing environment, a responsible credit decision now requires more than a credit score.

The recent changes to who can access more granular current account turnover data (CATO) offers lenders an opportunity to access a deeper understanding of their customers' affordability and enable more confident lending decisions.

Enhanced CATO data is a powerful tool to better understand your market, identify risks, and drive innovation. This session will demystify the data, explain why the change is so important, and how you can use this intelligence to drive growth, manage risk, and promote financial inclusion, building a future where credit decisions are smarter, fairer, and more sustainable.

HM Treasury: Update

This session will discuss the UK government's growth agenda and its plans to drive economic development across key sectors. We'll explore our next steps on financial inclusion and improving access to credit, highlighting initiatives aimed at supporting consumers and fostering innovation within financial services.

We will cover upcoming regulatory developments, including the government's approach to the regulation of Buy-Now Pay-Later and the review of the Consumer Credit Act. Additionally, we'll discuss the government's review of the Financial Ombudsman Service and the FCA's upcoming motor finance redress system.

This video update will provide attendees with insights into upcoming policy changes, regulatory priorities, and their implications.

Johnson, commissions and compliance: What firms should do next

The Supreme Court's decision in Johnson came as a welcome relief for lenders and dealers. But the FCA's broad announcement two days later of its proposal to consult on a redress scheme reintroduced uncertainty and concern. In this short talk, we'll consider the new rules of engagement for lenders, brokers, and intermediaries.

We'll also talk about what this means for commission disclosure, fiduciary duties, and unfair relationships. We will look at what to do next: how you should decode its implications for your business, and map out the concrete steps you should be taking now. Expect practical insights, strategic takeaways, and a clear view of what you can and should be doing now to prepare for the road ahead.



Mark Burns
Head of Consumer Finance
Financial Conduct Authority



Andrea Cox
Affordability Director
Equifax



Rebecca Denham

HM Treasury

Head of Consumer Credit Unit



Russell Kelsall

Partner, Head of Consumer

& Motor Finance, Walker Morris









The future of recurring payments: How VRPs can improve collections

This session explores Variable Recurring Payments (VRPs) - what they are, the different types, and their growing practical applications in today's payments landscape. We'll examine how Moneyline is leveraging VRPs to deliver seamless, customer-centric payment solutions, highlighting the specific problems they solve and the measurable benefits they provide to both users and the business.

We'll also dive into how VRPs are transforming merchant experiences by tackling long-standing pain points such as failed payments, customer churn, and operational inefficiencies. Attendees will learn how these innovations improve customer outcomes by enabling greater flexibility, control, and transparency. Finally, we'll showcase how Acquired is driving innovation in this space, enabling merchants to harness the full potential of VRPs and shaping the future of recurring payments.



Lawrence Byers Senior Product Manager Acquired.com

The Financial Ombudsman Service: Modernising the redress system

The presentation will talk about the current consultation proposals around modernising the redress system, a summary of the possible changes as well as what we've already been doing to improve the system and address key issues.

Charlotte will also share the impact that charging professional representatives has had on complaints, touch on our consultations around changes to compensation interest and differential charging, as well as a brief update on the current position on motor finance commission.



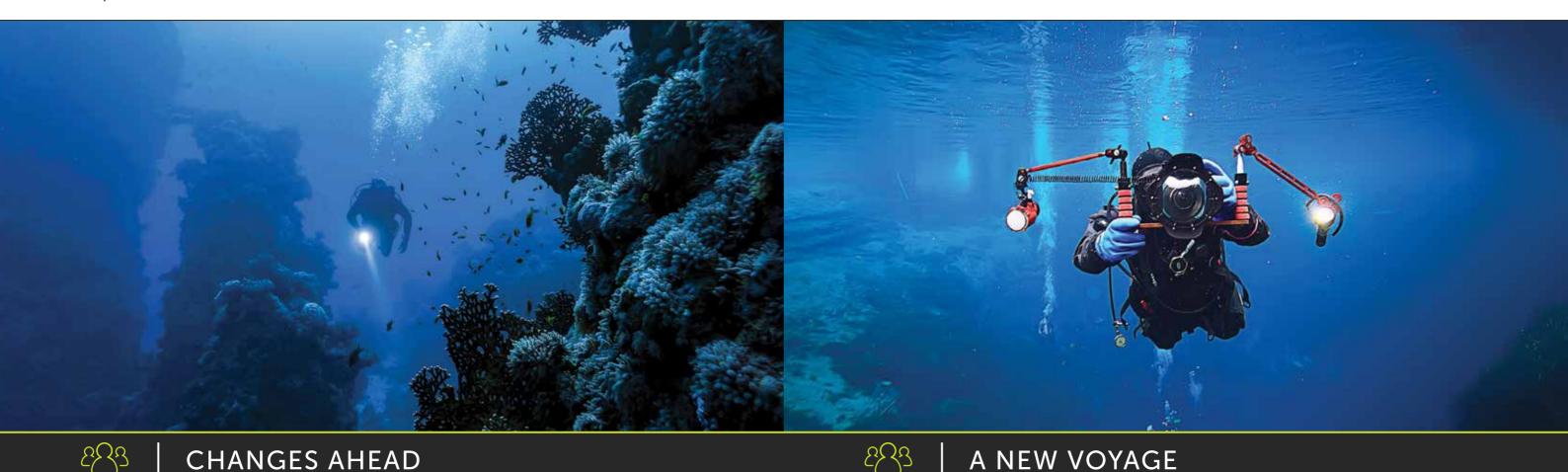


Charlotte Wilson Ombudsman Leader Financial Ombudsman Service



2025 ISSUE THREE AVAILABLE NOVEMBER AT CCTA.CO.UK

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REGULATORY PANEL OVERVIEW

Our panel of experts will discuss key developments shaping the regulatory landscape.

A central topic will be the review of the Consumer Credit Act, with panellists exploring how potential reforms could modernise and simplify the framework for both consumers and lenders.

Continuing the discussion, the panel will also examine the current review of the Financial Ombudsman Service, focusing on how it can improve efficiency and fairness in resolving consumer disputes.

It would be impossible not to cover the issue of motor finance commissions, as we look towards a forthcoming redress programme and how this should work in practice.

The panel has a background in this area and will be able to share their thoughts.

Overall, the session will provide valuable insights into the evolving regulatory environment and its implications for the future of consumer credit in the UK.

PANELLISTS



NAVIGATING REGULATORY DEVELOPMENTS

Mike Deans

Managing Director Borderway Finance



Jo Davis

CEO & Co-founder Auxillias



Stuart Horton

Head of UK Regulatory Compliance Snap-on



Clare Hughes

Partner
Addleshaw Goddard

TECHNOLOGY & INNOVATION PANEL OVERVIEW

This session will explore how the use of data and artificial intelligence are transforming the lending process. Panellists will discuss how lenders can leverage alternative and expanded data sources to streamline credit decisioning, reduce risk, and increase access to credit.

Turning to automation powered by artificial intelligence, panellists will cover how this can enable more efficient operations, from application processing to fraud detection and customer service. We will explore how these changes can improve customer outcomes across the lending lifecycle.

Participants will showcase how technology is set to reshape the consumer credit landscape - making it faster, smarter, and more inclusive - while underscoring the need for ethical frameworks to guide this rapid evolution.





PANELLISTS



HOW DATA IS HELPING FIRMS INNOVATE

Paul O'Sullivan

Global Head of Banking & Lending Aryza



Neil Allen

Head of Strategy LexisNexis Risk Solutions



Alfie Slark

Business Development Manager coeo UK

SPEAKER BIOS



PRESENTATION

SHERAZ AFZAL **Quint Group** Chief Legal, Risk & Compliance Officer

Sheraz Afzal serves as the Chief Legal, Risk & Compliance Officer at Quint Group, a high growth, independent fintech group operating across consumer credit and payments. Since joining in 2021, Sheraz has led a dynamic team dedicated to proactively identifying and managing legal and regulatory risks - ensuring Quint's continued compliance and supporting its expansion strategy. Before Quint, Sheraz was Chief Risk and Compliance Officer at Dollar Global Finance Corp, where he oversaw legal, risk, and compliance operations across the UK, Finland, Sweden, Spain, Portugal, and Romania. His earlier career included senior risk and compliance roles at Welcome Financial Services (Cattles) and the Royal Bank of Scotland Group. Sheraz earned his law degree from the University of Edinburgh.



PANELLIST

NEIL ALLEN Head of Strategy LexisNexis Risk Solutions

Neil began his career at Lloyds Banking Group, helping to grow their specialist mortgage brand to market leader before joining direct-to-consumer insurance company HomeServe.

Transitioning from financial services to credit reference agencies, he spent more than ten years in various product and consultancy roles at Experian and Equifax, working on credit and identity initiatives.

Neil now heads up credit risk strategy for Lexis Nexis Risk Solutions in the UK&I. A passionate fair finance advocate, he believes the credit industry can be a force for positive change in people's lives.

PRESENTATION



PRESENTATION

NAVEED ASIF CCTA Head of Policy & Advice



KEYNOTE

MARK BURNS **Financial Conduct Authority** Head of Consumer Finance

Naveed is the Head of Policy & Advice at CCTA. His role and responsibilities include advice and guidance to members in relation to legislative and regulatory matters.

Naveed has extensive experience and knowledge in consumer credit. Prior to joining CCTA, Naveed worked as a Compliance Consultant/Advisor for many years at various firms, supporting portfolios of clients with legislation, FCA regulation and compliance.

Naveed regularly speaks at both CCTA and industry events on matters that affect our members, and wider financial services firms.

Mark has over 25 years of experience in financial services, working in roles across banking, mortgages, life assurance and self-invested pensions. He joined the FCA in 2014, supervising many of the largest retail banking groups, digital and overseas banks. As Head of Department in Retail Banking he led the supervision aspects of the FCA's Access to Cash work.

He became Head of Department in Consumer Finance in September 2022 with responsibility for credit brokers, mortgage intermediaries and CMCs as well as the FCA's work on supporting borrowers in financial difficulty. He became Head of Consumer Finance in July, overseeing supervision of high cost and mainstream lending, credit unions and pawnbrokers.



PRESENTATION

LAWRENCE BYERS Acquired.com Senior Product Manager

Lawrence Byers is a Senior Product Manager at

launching Variable Recurring Payments (VRPs).

greater control and transparency.

Acquired.com, specialising in Open Banking and the

future of Account-to-Account payments. He leads the

With over five years in fintech, Lawrence is passionate

about reimagining how money moves - exploring how new payment rails can drive fairer outcomes, improve

collection success, and give businesses and consumers

company's Pay by Bank strategy, with a current focus on

ANDREA COX Equifax Affordability Director

> Andrea Cox is an industry expert specialising in affordability and financial vulnerability, with over twenty years of experience crafting data-driven solutions across diverse sectors. Her expertise includes conducting detailed income and expenditure assessments and identifying financial vulnerabilities early on.

Throughout her career, Andrea has made a significant impact in banking, finance, retail, telecom, utilities and debt management. Her understanding of the affordability challenges allows her to develop tailored strategies that effectively address financial distress.

Andrea's dedication to addressing financial vulnerability has not only influenced policy and practice but also helped countless organisations navigate their affordability challenges successfully.



KEYNOTE

NICOLA CRUMP Square 4 Advisory Director

Having worked with and for regulated consumer credit firms since 2014, Nicola possesses an outstanding working knowledge of FCA regulatory compliance, with particular in-depth knowledge of the Consumer Credit Act, Data Protection/GDPR and the FCA Handbook (CONC, PRIN, SYSC, COND, GEN, SUP and DISP) as well as experience in managing conduct risk, outcomes testing and financial crime and SM&CR.

Nicola has a wealth of experience in building and leading compliance teams in consumer credit environments, having led and implemented various large scale regulatory and strategy change transformational projects. She has a sound understanding of the importance of stakeholder relationships, collaboration and communication to drive success.



PANELLIST

JO DAVIS Auxillias CEO & Co-founder

Jo has over twenty years' experience at a senior level working for major UK law firms and in-house at RBS and VWFS. Jo specialises in the asset, motor finance, leasing and consumer finance sectors, provides financial services advice across a range of finance products and helps building online finance platforms for the broker and lending market.

She provides legal counsel and compliance and regulatory advice to her clients and has been ranked by Chambers and Partners for the last 17 years as one of the leading lawyers in the UK in consumer finance.

In the 2025 edition of Chambers UK, Jo maintained her Band 2 individual ranking in the Consumer Finance category and was described as "an extremely passionate lawyer with in-depth knowledge of the sector".

18 | SPEAKER BIOS



PANELLIST

MIKE DEANS Borderway Finance Managing Director

Mike has over 27 years of motor finance industry experience from account management through to operations and now in senior leadership having held the role of Managing Director since 2016. With a passion for delivering exceptional customer service and driving improvement across the sector Mike leverages his strong leadership and coaching skills on developing colleagues in delivering against a strong set of values and embedding a culture that puts the customer at the centre of the decision-making process. Borderway Finance has been a CCTA member since 2018 and Mike is now a CCTA Council Member representing motor finance lenders in shaping and delivering the CCTA's strategy and championing the voice of smaller lenders.



KEYNOTE

REBECCA DENHAM

HM Treasury

Head of Consumer Credit Unit

Rebecca is Head of the Consumer Credit Unit, within Financial Services in HMT. She is responsible for overseeing regulation of the UK's £200bn non-mortgage consumer lending market to ensure a properly functioning regime that works well for firms and consumers.

Rebecca joined HMT in March 2024 and prior to that, had a varied career in many Civil Service roles since 2009 including operational delivery, project management and policy development, delivery and legislative reform in HMRC, DfE and DLUHC.

Prior to this, he spent the last twenty years working in compliance teams within the near prime consumer

involved in two large customer redress programs; one

relating to PPI (working alongside the FSCS) and the

other focused on loan affordability.

credit marketplace. During that time, he has been



PRESENTATION

SARA DIAS-FOSTER
StepChange Debt Charity
Business Development Manager



PRESENTATION

MIKE ELLICOCK
Plain Numbers
Chief Executive

Sara is an experienced Business Development Manager who has been with StepChange Debt Charity for over thirteen years. With a strong foundation in operational leadership, she has successfully transitioned into a strategic role focused on growth, innovation, and partnership development.

Her deep understanding of the debt advice sector and commitment to client-centred solutions make her a valuable voice in driving forward sustainable change. Mike is a social entrepreneur with a passion for enabling everyone to use numbers and data to make better decisions. Following a military career, an MBA and brief stints in banking and maths education, he launched National Numeracy in 2012, building the organisation into a well-respected national charity. Having handed over as Chief Executive there in 2020, Mike launched Plain Numbers in early 2021.

He now uses his deep expertise to help organisations in regulated markets to unlock better ways to communicate with their customers. This evidence-based approach significantly improves understanding and enables better outcomes, both for customers and for Plain Numbers Partner organisations.



regulated firms.

riangle CHAIR

MARK FIANDER
GAIN Credit
Chief Executive Officer

Mark is Chief Executive of GAIN Credit, a consumer

lending business focused on the UK and Chair of the

CCTA. In 2024 Mark also joined the FCA's Smaller

Stuart has worked at Snap-on for five years in their
financial services compliance team, looking after the UK
businesses that are regulated by the FCA.

Having spent over a decade at Unilever, Mark held senior leadership roles with both RBS / NatWest and Bupa.

He also served as Executive Director of the Money

Advice Service, now the Money and Pensions Service,

driving strategy, policy and proposition development.

Business Practitioner panel, which represents smaller

Mark has spoken at the UN, G20 and European Central Bank on building the financial resilience of consumers and co-founded a not-for-profit, focused on helping long-term unemployed people remain positive and reskill.



R PANELLIST

STUART HORTON
Snap-on
Head of UK Regulatory Compliance

Clare is a specialist in consumer finance with over twenty years' experience advising clients across the full range of regulatory issues affecting consumer credit firms. Clare's clients include retail banks, monoline card issuers, non-bank lenders, asset finance and motor finance lenders, as well as brokers and credit information service providers.

Clare's practice includes advising on authorisations, governance issues, authorisation applications, regulatory due diligence as well as new product launches and compliance assurance reviews.



PANELLIST

CLARE HUGHES
Addleshaw Goddard



KEYNOTE

RUSSELL KELSALL Walker Morris Partner, Head of Consumer & Motor Finance

Russell heads up the award-winning Consumer and Motor Finance Team at Walker Morris. He deals with financial services issues (with a particular expertise in motor, consumer, asset and mortgage finance). He is a recognised industry expert and a 'go to' lawyer for the most difficult issues in the industry.

Russell provides training to the industry and delivers popular courses for the Finance & Leasing Association and UK Finance. He is also a CCTA Council Member.

Russell is the author of 'Consumer Credit: Law, Practice and Precedents' and an editor of 'Goode: Consumer Credit Law and Practice', 'Goode: Consumer Credit Reports', 'Butterworths Financial Regulation Service', 'Asset & Project Finance' and 'Practical Lending and Security Precedents'.

20 | SPEAKER BIOS



PRESENTATION

RACHAEL MAGOWAN

Moneyline

Chief Technology Officer

Rachael has over 25 years' experience working across Financial Services, with over twenty of those years being in the Yorkshire Building Society. Rachael has a broad range of skills and expertise gained from her variety of roles which include being Head of Branch Network to Portfolio Business Change Manager.

Rachael has been at Moneyline for four years and delivered the systems change required to move from being a mainly branch based organisation to a lender who can support vulnerable customers in a digital world.



PRESENTATION

ASIF NADEEM

Evlo

Chief Transformation Officer

Asif joined Evlo as Chief Transformation Officer in 2023. Prior to this he worked at Loans at Home for six years in a variety of roles, the last of which was as Central Operations Director. Previously, he worked for Provident Financial for thirteen years. He is a qualified accountant, and has worked across a variety of roles in finance, credit and analytics, change management and IT.

Asif has a passion for people, data and technology and developing and driving initiatives that help growth, as well as improve operational efficiency, effectiveness and competitiveness.



PANELLIST

PAUL O'SULLIVAN

Aryza

Global Head of Banking & Lending



PANELLIST

ALFIE SLARK
coeo UK
Business Development Manager

As Global Head of Banking & Lending at Aryza, Paul plays an integral role in developing loan and lease management solutions to support lenders working across the entire debt cycle.

Paul has extensive experience and is a leading figure in the instalment credit software industry. He has a deep understanding of the market sectors in which Aryza operates and is committed to helping customers drive operational efficiency through the deployment of specialist, bespoke technology.

Aryza works with over 300 finance companies, from start-ups through to established national businesses.

Alfie has a proven track record in building and nurturing client relationships across all sectors. Since joining coeo in 2024, he has focused on driving business growth, identifying new market opportunities, and strengthening partnerships that deliver measurable value for clients.

Alfie has gained extensive experience across L&D, client management, operations, and leadership. His ability to combine strategic thinking with hands-on client engagement has consistently contributed to business success, both at coeo and in previous positions. Passionate about delivering tailored solutions and fostering collaboration, Alfie plays a key role in coeo's mission to support clients in managing debt responsibly while achieving sustainable growth.



PRESENTATION

JASON WASSELL
CCTA
Chief Executive

Jason has over twenty years' experience in strategy development, risk, and communications. He has increasingly focused on risk and strategy in financial services over recent years.

He is currently Chief Executive Officer of CCTA which represents firms that offer alternative lending products. Jason helps firms adapt to the changing regulation of consumer credit, engaging directly with the FCA on issues of policy and supervision.

Jason's previous experience includes work within financial services, energy and infrastructure development. Before coming to consumer credit, Jason was involved in planning around resilience issues including fuel shortages and pandemics.



REYNOTE

CHARLOTTE WILSON
Financial Ombudsman Service
Ombudsman Leader

Charlotte has worked for the FOS for fourteen years, with over eleven of those spent in various Ombudsman and leadership roles. The FOS has been handling complaints between financial businesses and their customers since they were set up by Parliament in 2001.

Charlotte's experience spans across the service and has had recent focus in consumer credit where she leads engagement with larger professional representatives. She's recently led a successful pilot for irresponsible lending complaints in which professional representatives were required to produce more information upfront before the cases were moved to investigation and became chargeable. The FOS will use lessons from this as they develop the registration stage proposals.

Assure 4:

Revolutionising outcomes testing with Al-enabled assurance

The consumer credit sector is no stranger to regulatory change, but the Financial Conduct Authority's (FCA) Consumer Duty has raised the bar further. Firms must prove that their customers consistently receive good outcomes throughout the lifecycle of a product or service. That's a significant challenge given customer data is vast, complex, and constantly shifting. For those firms relying on process adherence and quality assurance (QA) to evidence meeting the Duty, think again. While QA is an effective control to support colleague competency metrics, it can't be relied upon to demonstrate good customer outcomes.

HOW CAN AI SUPPORT OUTCOMES TESTING?

Al is rapidly becoming a game-changer in outcomes testing. Traditionally, firms have relied on human-led reviews, small statistically irrelevant samples and retrospective analysis to assess outcomes. These approaches are slow, costly, resource-heavy and often missing the bigger picture. Al changes that.

By harnessing AI, firms can scan millions of records, from transaction data to call transcripts, at speed and scale. Instead of analysing small customer segments, AI makes it possible to test entire populations, identifying subtle patterns that indicate poor outcomes. It can show if certain customer groups pay higher fees, misunderstand terms, or struggle with repayments.

But the real power of AI lies in its predictive capabilities. Rather than reporting past failings, advanced models can forecast where risks are likely to arise. Allowing firms to step in earlier, adjust products, refine communications, or offer tailored support to vulnerable customers,

strengthening the firm's resilience and trust, and benefiting the customer by reducing the risk of harm.

There are also practical benefits. Outcomes testing is notoriously resource-intensive and costly, often pulling colleagues away for manual checks. Al automates the heavy lifting - colleagues can focus on interpreting insights and driving change for a fraction of the cost. Reporting becomes faster, clearer, and easier to evidence, a key advantage during regulatory scrutiny.

Beyond operational and regulatory considerations,
Al unlocks opportunities to innovate. Tools that flag
risks can also uncover unmet needs, enabling firms to
design fairer, more customer-focused products. Success
depends on aligning compliance with customer value,
underpinned by a 'human in the loop' model assuring
final determinations.

INTRODUCING ASSURE 4 - AI ENABLED ASSURANCE

Square 4 has developed Assure 4, an Al-powered outcomes testing solution, designed to help firms comply with the Duty by providing accurate, scalable, and cost-efficient validation of customer outcomes.

However, Assure 4 is not just another assurance tool or AI model. It is built around a market-leading and award-winning Outcomes Testing Framework that has been successfully implemented across various firms and sectors, even under the gaze of regulators. This Framework was recognised by the International Compliance Association where Square 4 won 'Compliance Consultancy Firm of the Year' 2024.

This Al-enabled assurance solution deploys at speed, offering precise, objective insights at scale, enabling smarter, more consistent decision-making and increased operational efficiency. It also generates strong, auditable evidence of the outcomes customers are receiving, which can directly support the conclusions in a firm's annual Consumer Duty Board report.

And finally, this is more than just an automated Al outcomes testing solution. Assure 4 is managed and overseen by Square 4's regulatory experts, who provide ongoing oversight and challenge of the outputs. This combination of an award-winning Outcomes Testing Framework, advanced Al and the independence, objectivity and expertise of the Square 4 team is particularly valuable in keeping up with the everchanging regulatory landscape.

CONCLUSION

For firms, AI is no longer just about efficiency, it's about redefining how firms deliver on promises to customers. As the sector continues to embed the Consumer Duty, those who embrace AI in outcomes testing will not only meet regulatory expectations but also set themselves apart as leaders in customer trust. Assure 4 is a vital enabler, helping firms ensure the integrity and quality of the outcomes they deliver to customers.



24 | ARTICLES

Motor commissions

Key factors to consider before any proposed scheme

So, it finally happened. The Supreme Court handed down its long-anticipated judgment on motor finance commissions on 1 August in probably one of its the most watched streams. Did the viewing figures exceed the Super Bowl? No. But did it provide welcome relief to lenders? Yes. Well. Until the Financial Conduct Authority (FCA) made its own announcement on 3 August proposing to consult on a scheme for motor finance commission claims in October 2025.

But should we nervously await the FCA's consultation? Our view is no. There is plenty to think about, and prepare for, before the FCA starts to consult on its proposals. The timeframe for responding is expected to be short: perhaps six weeks. Firms need to be ready to respond and we'd encourage as many individual responses as possible.

WHAT TO BE THINKING ABOUT NOW

The key focus is on unfair relationships.

These provisions apply to all 'credit agreements' (so could include exempt agreements like business use exempt agreements with a sole trader, or a partnership of two or three partners) but don't apply to any hire agreements (including regulated consumer hire agreements).

The broad test is "highly fact-sensitive" meaning what's fair in one relationship could be unfair in another. They apply to all 'credit agreements' entered into on or after 6 April 2007 (and even some before depending on the circumstances). They also have a potentially generous limitation period. If unfairness is found, any remedy should be proportionate to the nature and degree of unfairness found and should not give a windfall.

So, think about the scope of your book, the features (and how they changed over time), any incentives or deal features which are relevant and any relevant touchpoints about commission over the years.

The Financial Ombudsman Service has had a jurisdiction to consider consumer credit complaints for things done, or not done, since 6 April 2007. But that doesn't align with the regulation of consumer credit (which transferred from the Office of Fair Trading to the FCA on 1 April 2014). The Ombudsman has been adopting a broad approach to its time-barring rules in DISP 2.8.2R, particularly where an unfair relationship claim is made, or could be made.

So, think about how any scheme would work together with the Ombudsman and whether the proposals could give customers more options than they currently have.

The FCA's powers on when it can make a consumer redress scheme are prescribed by law. They can be broadened in limited circumstances but usually require an order being made by HM Treasury. The FCA proposes to go back to 2007 (which presumably means 6 April 2007) but this is far from straight-forward for a consumer redress scheme. The unfair relationship provisions also provide a challenging basis for a consumer redress scheme. Is the FCA able to say there has been widespread or regular failure particularly when the Supreme Court made it clear that the unfair

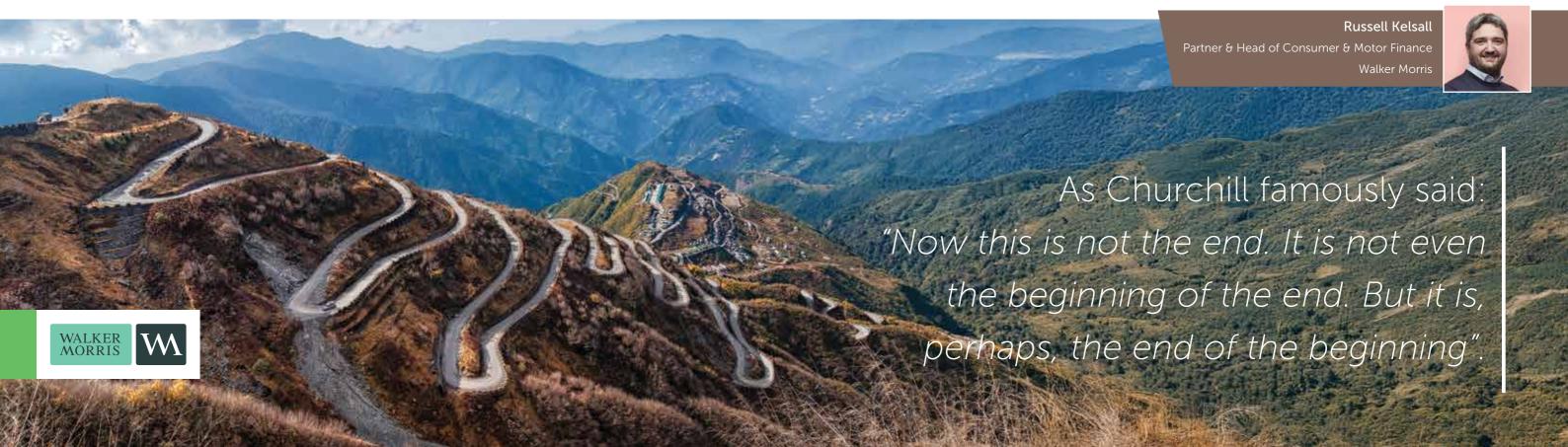
relationship provisions are highly fact-sensitive?
Think about the different approaches the FCA can take and how they may affect you.

• The challenge of data retention.

Under data protection laws, firms are required to keep personal data for "no longer than necessary". The FCA's rules for consumer credit firms are less clear. Where one firm has kept data longer than another, this could create inherent unfairness between those firms.

CONCLUSION

There remains a lot of road to go. Barclays' appeal on its judicial review started on 16 September. There will then be judgment and a potential further appeal to the Supreme Court. The FCA's proposals on any scheme may also be judicially reviewed. As Churchill famously said: "Now this is not the end. It is not even the beginning of the end. But it is, perhaps, the end of the beginning". Those words are perhaps even more appropriate now.



26 | ARTICLES

Tackling financial exclusion through personalised lending

Financial exclusion is one of the fastest-growing issues in the UK credit landscape. Today, over 20 million adults are considered financially underserved – a 50% increase since 2016. One in three adults faces barriers to accessing mainstream credit, often due to limited credit histories or past financial difficulties. Without safe alternatives, many are left vulnerable, with more than 3 million turning to illegal lenders in the past three years.

Mainstream banks have largely withdrawn from subprime lending, and many former providers have exited the market altogether. In this vacuum, illegal money lending has flourished, exploiting families who simply need a fair chance to manage life's ups and downs. The need for responsible, inclusive credit solutions has never been greater.

OUR APPROACH TO INCLUSION

At Evlo, we've been committed to financial inclusion since 2006. As an independent personal loan provider, we specialise in helping customers who have previously struggled with credit to rebuild their financial standing. Our mission is to help people climb the credit ladder.

We believe that lending should be personal. That's why we speak with every customer during the application process, most often face-to-face in one of our nationwide branches. This human-centred approach allows us to understand each individual's financial position and lend responsibly, with dignity and affordability at the heart of every decision.

TECHNOLOGY WITH A HUMAN TOUCH

While our model is rooted in personal interaction, it's supported by the latest technology. We use tools like Open Banking and artificial intelligence to enhance our decision-making, apply appropriate levels of friction, and ensure regulatory compliance. This hybrid approach allows us to safely serve a large, underserved segment of consumers – delivering strong customer outcomes and higher collection performance than comparable straight-through lending models.

Financial exclusion is a growing national challenge, but it is not an unsolvable one. With empathy, innovation, and accountability, we can offer fair access to credit, protect people from harm, and support long-term financial resilience. At Evlo, we're proud to be part of this renewal – proving that credit, done responsibly, can help people move forward and rebuild trust in the system.





Harnessing data for smarter lending:

Driving efficiency through automation

Data has become an essential asset for organisations in the financial sector, aiming to optimise operations, reduce risk, and enhance customer experiences. For lenders, the strategic use of data is transforming traditional processes by enabling automation throughout the credit lifecycle, from onboarding and affordability assessments to collections and recovery.

Lenders are increasingly using a wider range of data sources, including open banking feeds, real-time income verification, and behavioural analytics. These insights go far beyond traditional credit scores, allowing for faster, fairer, and more personalised decision-making. This shift supports operational agility while improving compliance and customer outcomes.

Al is playing an increasingly significant role in this transformation, particularly in how lenders engage with customers. Conversational Al tools, for example, are now employed to automate routine engagements, answer customer queries, and guide individuals through complex financial processes in a clear and empathetic manner. By harnessing data to understand each customer's unique circumstances, these Al systems can offer personalised support, helping borrowers access the appropriate solutions at the right moment.

This intelligent automation not only boosts the customer experience but also enhances operational efficiency. Al-driven engagement tools can significantly decrease call volumes, accelerate resolutions, and ensure consistent communication across all channels. When coupled with real-time data, they can prompt proactive interventions when early signs of financial distress emerge - creating opportunities for assistance well before accounts fall into arrears.

As data volumes and complexity grow, organisations that combine intelligent engagement with robust data foundations will be best positioned to adapt and succeed. The future of lending depends on systems that not only automate but also communicate with accuracy and clarity.

Data is no longer merely a record of the past; it is a tool for meaningful, real-time connection. When used wisely, it can lead to smarter decisions, stronger relationships, and more sustainable outcomes for both lenders and borrowers



Variable Recurring Payments:

The future of intelligent, flexible payment collections

Recurring payments are essential in consumer credit. Traditionally, the choice has been between:

- Card-on-File (CPA): Offers flexibility and immediacy, but comes with higher costs, higher failure rates, and exposure to chargebacks.
- **Direct Debit:** Offers stability and low processing costs, but is slow, rigid, and provides limited flexibility for dynamic or ad-hoc collections.

This has left firms balancing cost, reliability, and customer experience, with neither addressing all needs.

INTRODUCING VARIABLE RECURRING PAYMENTS

Variable Recurring Payments (VRPs) are the next generation of Open Banking technology. They allow a customer to give ongoing consent for payments to be taken directly from their bank account, within clear preagreed limits on amount, frequency, and duration. This combines the strengths of cards and Direct Debit while avoiding many of their weaknesses.

WHY VRPs MATTER FOR BUSINESS

- Instant settlement: Funds arrive in seconds via Faster Payments, strengthening cash flow.
- **Higher success rates:** Reduces common causes of payment failure.
- Operational efficiency: Real-time visibility of payment outcomes enables faster recovery action.
- Cost efficiency: Reduced costs for each collection

WHY VRPs MATTER FOR BORROWERS

- Transparency: Clear limits on amount, frequency, and duration of payments.
- Convenience: A simple, streamlined setup with instant confirmation and no need to enter card or account details.
- Fairer outcomes: Fewer failed payments reduce the risk of unnecessary fees or credit impacts.

ACQUIRED.COM's APPROACH TO VRPs

At Acquired.com, our mission is simple: to power recurring commerce. Recurring payments sit at the heart of that mission, and our platform gives businesses the flexibility to manage every major rail, from VRPs to cards and digital wallets, through a single connection.

We are at the forefront of VRP innovation in the UK. By building our own infrastructure with direct bank connectivity, we maintain end-to-end control of the payment journey. That means faster speed to market, greater reliability, and cost efficiency for our customers, without third-party dependencies.

VRPs are not just another way to pay. They represent a transparent, resilient, and future-ready foundation for recurring payments. With Acquired.com, that future is already here.

For information contact: sales@acquired.com.



the latest legislation, regulatory updates and industry announcements

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HEADLINE SPONSOR WALKER MORRIS

Walker Morris is an award-winning law firm providing practical and commercially focussed solutions for consumer, motor, asset, and mortgage finance firms. We work with major names in the industry including well-known players, fintechs and start-ups. We also work across our industry: advising lenders, brokers and dealers, and debt buyers.

We provide a true end-to-end service. We regularly advise on:

- · permissions and authorisations;
- financial promotions and marketing;
- policies and procedures;
- regulatory processes;
- documentation (customer facing documents and wider commercial documents);
- contentious issues (including dealing with technical complaints to the Ombudsman, complex issues before the Court or discussions with a regulator); and
- · remediation projects.

Our team is a unique blend of industry experts and former regulators. All of our lawyers have both advisory and contentious expertise. We're regularly instructed to deal with test cases including:

- advising firms on lead cases before the Ombudsman;
- acting for a lender in the Supreme Court on the test case on motor commissions; and
- successfully defending a test case in the High Court on claims brought by members of the so-called 'Freeman on the land' movement.

We draft innovative products and are the forefront of product launches and industry developments. We author many industry practitioner materials including Goode: Consumer Credit Law and Practice and Butterworths Financial Regulation Service. We train the industry, and speak at conferences, through our long-standing relationships with trade associations. We're embedded in your industry and understand what you do.



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HEADLINE SPONSOR SQUARE 4

Square 4 is an award-winning professional services firm founded in 2021. We specialise in supporting regulated financial services businesses across governance, conduct, financial crime, risk, and operations, enabling them to grow in an evolving regulatory environment.

Our model blends deep regulatory expertise with operational excellence, helping clients assure compliance and protect trust in their brands.

With a team of over thirty experienced consultants, we offer regulatory knowledge across all areas of your business. We provide bespoke reviews of governance and operations to drive compliance, efficiency, good customer outcomes, and staff satisfaction. We also support the design, implementation, and measurement of change initiatives.

Recognising that long-term improvements sometimes require short-term support, we offer market-leading interim resource solutions with expert oversight.

We deliver high-impact results across four key service lines:

- Advisory: Bespoke risk and performance advice built around your business
- **Interim Resource**: Expert temporary support to enhance resilience and outcomes
- Managed Services: Flexible, tailored outsourcing to meet your needs
- Technology: Al-driven tools for operational efficiency and better governance

Our team brings experience from top-tier firms, regulators, and institutions, enabling us to deliver flexible, market-leading solutions. Founded with a purpose to tailor services to each client's unique needs, we were named 2024 Compliance Consultancy Firm of the Year by the International Compliance Association. We also give back, committing 4% of annual earnings to causes like Sue Ryder and Samaritans, alongside employee-led charitable initiatives.

Square 4 shapes the future of financial services with integrity, insight, and impact.



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SUPPORTERS



DINNER SPONSOR EVLO

Evlo is a business committed to financial inclusion. It helps customers build a stronger financial future by empowering them with a personal, human approach and responsible borrowing options. Evlo understands that life has ups and downs and appreciates that this can sometimes impact customers' finances.

Evlo has been helping customers with their finances since 2006 and has extensive experience providing tailored support. Evlo is committed to professional, responsible lending. It offers personal loans from £1,000 to £15,000 over terms of up to five years.

PANEL SPONSOR ARYZA

Aryza is a global provider of Credit & Debt Lifecycle Management SaaS solutions, working with our customers and partners to create and deliver solutions that improve the financial health and lives of the millions of people that engage with our products every day. Our mission is to transform the financial relationship businesses have with their customers.

Focused on the credit, collections, recovery, GRC and insolvency sectors, Aryza's solutions automate a range of activities, including loan origination and management, data collection and affordability assessment, administration, recovery, and payment processing, covering every stage of the credit and debt cycle.

Aryza's solutions are underpinned by unrivalled expertise and powerful data. Since its foundation in 2002, the business has grown rapidly. Today, it has global operations across four continents.

aryza.com



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ACQUIRED.COM

LUNCH SPONSOR ACQUIRED.COM

Acquired.com is a leading payments platform built to power the entire payment lifecycle for recurring commerce. Our all-in-one, scalable solution enables businesses to seamlessly onboard customers across open banking, direct debit, cards, and digital wallets while optimising ongoing transactions and maximising payment success.

By intelligently matching customers to the best payment method, reducing failures in real time, and recovering lost revenue post-payment, Acquired.com helps businesses protect and grow recurring revenue streams. Our unified API provides complete control and visibility, delivering actionable insights alongside expert, hands-on support to improve performance at every stage.

Built with flexibility and compliance at its core, Acquired.com is designed to solve today's most pressing challenges, from reducing card processing costs and chargebacks to meeting customer demand for frictionless payments. The result: fewer declines, lower costs, happier customers, and stronger retention.

Acquired.com - Increase payment success. Reduce failed transactions. Optimise every payment.



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EXHIBITOR EQUIFAX At Equifax, we believe knowledge drives progress. As a global data, analytics, and technology company, we play an essential role in the global economy by helping financial institutions, companies, employers, and government agencies make critical decisions with greater confidence. Our unique blend of differentiated data, analytics, and cloud technology drives insights to power decisions to move people forward. Headquartered in Atlanta and supported by nearly 15,000 employees worldwide, Equifax operates or has investments in 24 countries in North America, Central and South America, Europe, and the Asia Pacific region.

Equifax Ltd is one of the Equifax group companies based in the UK. Equifax Ltd is authorised and regulated by the Financial Conduct Authority.



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EXHIBITOR MONEYLINE

Moneyline is a not-for-profit lender offering credit to those who are most excluded. We offer small loans from £200 to £1,000 with no fees, no judgment, and humans to help through the journey. We don't expect perfect credit and we understand that life doesn't always go to plan. Our loans are flexible to reflect the financial lives of the customers we are here to serve. With over twenty years' experience, we've helped thousands of people improve their financial resilience over time. Everything we do is focused on making money simple, clear and affordable for those who need it most.



moneyline-uk.com



QUALCO delivers advanced software solutions that empower businesses to navigate the complexities of the credit and lending landscape while maintaining compliance with industry and regulatory standards.

Spanning the entire credit value chain, QUALCO harnesses advanced analytics and digital innovation to optimise operations, elevate customer experience, and equip financial institutions with the agility to scale efficiently and achieve sustainable growth in a digital-first world.



qualco.eu



EXHIBITOR CCTA ACADEMY

CCTA Academy is built on the experience and insights from our membership. With a specific focus on consumer credit compliance, the platform provides tailored online training modules at both staff and manager levels. It also accommodates ongoing learning and development opportunities through Live Learning sessions from CCTA.

The compliance training modules are relevant to the training and competency expectations of the FCA. The platform allows full audit facilities, providing firms with a solid foundation when it comes to proving that their team members are well-trained.



ccta.co.uk/ccta-academy



EXHIBITOR
STEPCHANGE DEBT CHARITY

We are the UK's leading debt charity, contacted by hundreds of thousands of people a year from across the UK. We help people in debt to sleep at night knowing that they have a realistic plan to address their financial problems.

We are FCA authorised and work with government, regulators, other charities and a range of partners to provide the best support possible to clients, to address the misconceptions that underpin the stigma of debt, and to change public policy to reduce the risk of debt. We support people to take back control of their situation and we never judge.



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CCTA Academy is built on the experience and insights of our membership and shaped by our work with regulators. With a specific focus on consumer credit compliance, the platform provides tailored online training modules at both staff and manager levels. It also accommodates ongoing learning and development opportunities through Live Learning sessions from CCTA.

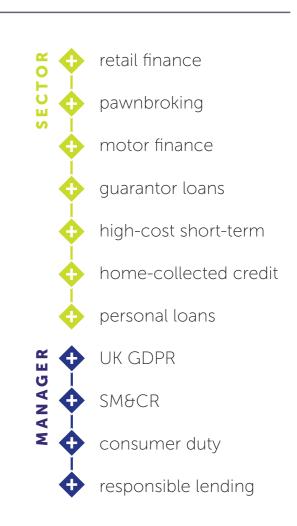
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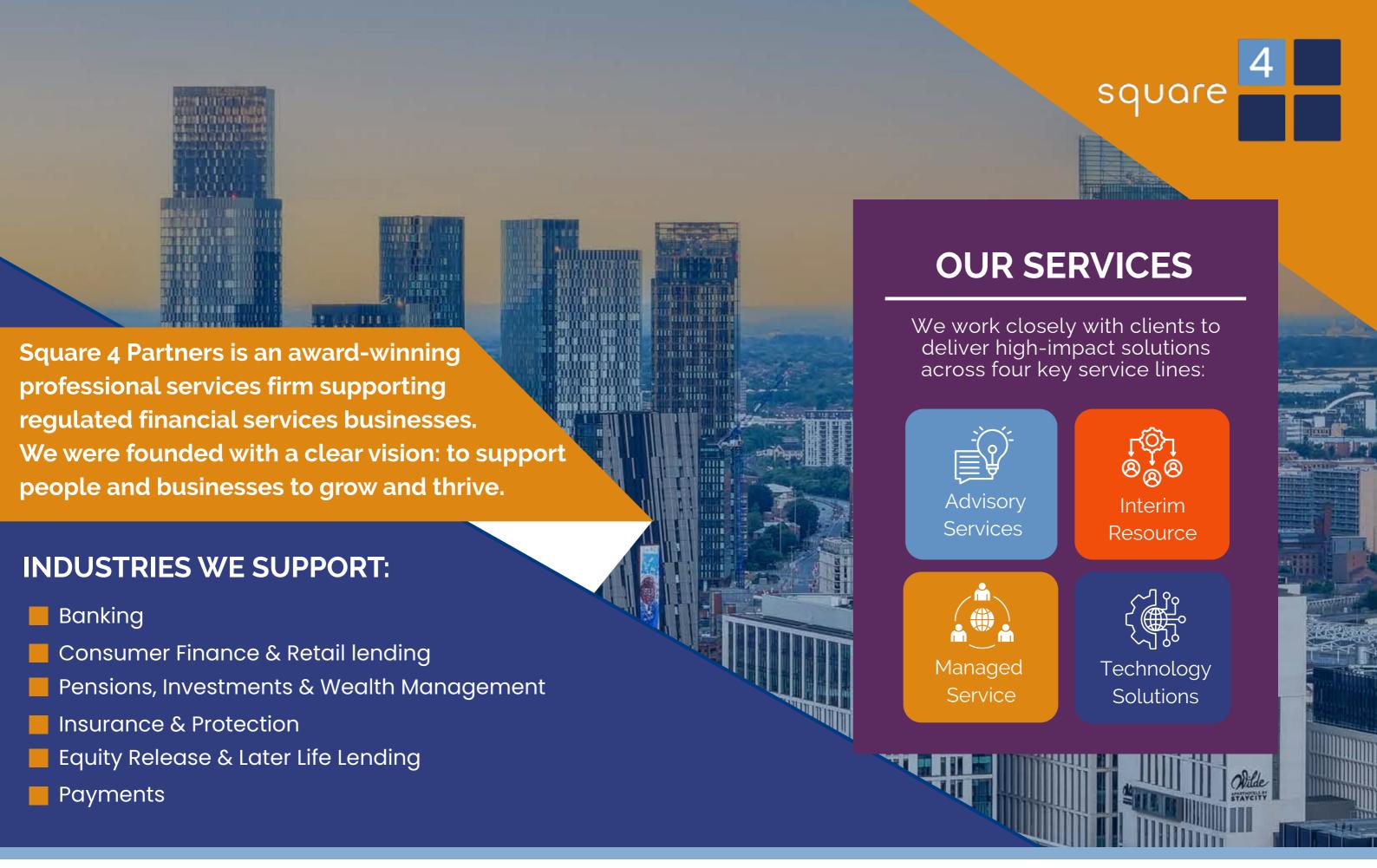


For more information, visit www.ccta.co.uk

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Stronger Together: Building Alliances to Tackle Financial Exclusion

What Drives Us

Over 20 million UK adults are financially underserved, and around 3 million have turned to illegal lenders. At Evlo, we're committed to changing that—by helping people who mainstream banks have overlooked regain control and confidence.

At Evlo, we believe everyone deserves a fair chance at financial stability. While others rely solely on algorithms, we put people first. Our blended approach combines smart systems with face-to-face, human-centred decisions, unlocking access to credit where others can't.



Our Financial Freedom for Everyone campaign

Right now, paying rent on time doesn't always help build credit – unlike mortgage payments. We want to change that. By ensuring credit agencies include rental data, we can help millions of people improve their financial future.

We're actively speaking to parliament, leading the Financial Freedom for Everyone campaign to raise awareness and push for better policies that promote inclusion.



Read more about mission

Building an Alliance

Across the UK, millions face barriers to affordable and fair credit. While many organisations are doing great work to support these communities, much of it happens in isolation - making it harder to create lasting change. At Evlo, we believe the solution lies in collaboration. By uniting lenders, community groups, regulators, and innovators, we can share insights, amplify best practices, and design better pathways for customers who are excluded from mainstream finance.

Partnerships built on collaboration, shared purpose, and open dialogue can accelerate progress. Whether it's helping customers graduate back up the credit ladder, offering affordable credit alternatives, or developing tools that build long-term financial resilience, we know that our collective impact will be far greater than the sum of our individual efforts.

If you share our vision for a more inclusive financial system, we'd love to connect and collaborate in any way possible. Let's work together to ensure that no one is left behind.

Join the conversation!

If you'd like to join the fight, please speak to us or contact

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- Actionable insights
- · Expert, hands-on support



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Qualco has over 25 years of experience helping financial institutions in 30+ countries manage credit and loans. We build scalable software that streamlines the credit lifecycle and modernises customer experiences with data-driven and Al-enhanced solutions. Our technology supports every stage of the credit journey, improving compliance, efficiency, and sustainable growth.

Let's talk.

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