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The RBA is asking good questions about our industry.

The Reserve Bank's March 2026 Financial Stability Review reports strong growth in non-bank and private credit lending, notes that some lenders have loosened loan conditions in property development finance, and states that regulators have limited information about private credit lending standards. This paper summarises those findings accurately, agrees that the questions are fair, and answers them with a specific list: the ten numbers we believe any pooled mortgage fund should publish, which Oxford commits to publishing quarterly from its first loan.

Q. I · THE SECTOR
IN DRAFT · NO. 06

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SUMMARY

Twice a year the Reserve Bank of Australia publishes its assessment of risks to the financial system. The March 2026 edition gave sustained attention to our corner of the market, private credit and non-bank lending, and its findings deserve accurate summary rather than a defensive press release.[1,2,3]

WHAT THE REVIEW FOUND	OUR READING OF IT
Non-bank and private credit lending has continued to grow strongly, increasing the availability of credit for housing and business borrowers.	Accurate. The sector is growing quickly, ours included.
That increased availability could mean higher loan losses in the years ahead, though the sector's relatively small size limits the risk to the wider system.	A fair statement of how credit cycles work. Fast growing lending is where standards slip first.
Competition in commercial property finance has led some lenders to loosen loan covenants and lower presale requirements for residential developments.	A specific, checkable observation about our market segment, and a useful one.
Information is more limited on lending by non-bank lenders, and private credit firms in particular.	The core finding. The regulator cannot see most private books, and neither can the investors funding them.

Section 01 expands on why the information gap exists. Section 02 is the substantive answer: ten numbers that make a mortgage fund's lending standards visible, and a dated commitment to publish Oxford's own, quarterly, on the public research page where this paper sits, from the fund's first loan onward.

> **What this paper does not claim:** that regulation is unnecessary, or that our sector's growth contains no risk. A fund that cannot survive scrutiny of its lending standards is not being harmed by the scrutiny.

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FINANCIAL STABILITY REVIEW CITED	NUMBERS ON THE DISCLOSURE LIST	PUBLICATION FREQUENCY COMMITTED	PUBLICATION STARTS WITH THE FIRST LOAN

SECTION 01

Why the regulator cannot see us, and why that is our problem.

The information gap the Review describes is built into how private credit works, and none of its causes involve wrongdoing. The comparison below shows the difference in plain terms.

VISIBILITY ITEM	A BANK	A TYPICAL PRIVATE MORTGAGE FUND
Reports lending data to APRA	Yes, in detail, continuously	No
Credit rating on the institution	Yes, monitored	Usually none
Loan book statistics published	Yes, half yearly at minimum	At the manager's discretion
Prices marked by a market	Listed securities, daily	No traded prices
Who can check the lending standards	APRA, ratings agencies, analysts, the market	The manager, and anyone the manager chooses to show

The last row carries the weight. When the Review says information is limited, it means the checking function that surrounds a bank simply has no counterpart here unless managers create one voluntarily. Investors face the same wall: they can see the sector's marketing easily and its lending standards barely.

PLAIN ENGLISH · WHY WE VOLUNTEER

Disclosure sorts managers. Publishing the ten numbers below is straightforward for a fund whose book matches its marketing, and uncomfortable for a fund whose book does not. A manager who declines to publish them is providing information of a different kind. We would rather be in the first group, checkably.

SECTION 02

The ten numbers, and what each one protects against.

DISCLOSURE	WHAT IT SHOWS AN INVESTOR	WHAT ITS ABSENCE CAN HIDE
1 · Weighted average LVR, plus the spread and the maximum	The size of the equity buffer on every loan, and the worst case in the book	A 65 average assembled from 50s and 85s
2 · Arrears at 30, 60 and 90 days, by value	Whether borrowers are paying on time	Stress building behind a smooth return line
3 · Largest loan and top ten as a share of the book	How much rides on any single borrower	A fund that is, in substance, three loans
4 · Geographic and property type split	Where the security properties actually are	Concentration underneath a citywide label
5 · Construction and development share, with presale and cost to complete rules	Exposure to the segment where the Review saw conditions loosen	Development risk priced as if it were investment risk
6 · Ranking: the share of the book that is first registered	Position in the recovery queue, per Paper 05	Second mortgages pooled under the word secured
7 · Valuation policy: panel, independence, rotation, maximum age	Whether the value under every LVR is current and arm's length	Stale or accommodating valuations
8 · Related party exposures, by name and amount, or a signed zero	Whose projects the fund is financing	The most common single failure in the sector's history
9 · Extension and rollover rates	Whether loans repay in cash or roll into new terms	Renewals presented as performance
10 · Cash held and the loss reserve policy	The fund's own liquidity and its buffer after borrower equity	A fully lent fund with no shock absorber

The list draws on ASIC Regulatory Guide 45, which sets benchmarks for retail mortgage schemes, adapted for a wholesale fund. Method notes.

SECTION 03

The commitment, with dates attached.

Oxford will publish its own figures against all ten lines, quarterly, on this research page, beginning with the fund's first loan. The first table will describe a very small book, and its percentages will be lumpy for exactly that reason. We regard publishing the early, unimpressive versions as part of the point: a disclosure habit that starts only once the numbers look good is a marketing schedule.

MILESTONE	WHAT GETS PUBLISHED	WHERE
First loan settles	The ten line table, opening edition	oxfordcap.com.au/research, beside this paper
Every quarter after	The full table, updated, with the prior quarter kept visible	Same page, dated
Annually	Valuation panel list and policy, reviewed	Same page

For investors comparing managers, the list also works in reverse, as a set of questions to put to anyone offering a mortgage fund. The answers worth attention are specific numbers with dates. Answers that arrive as adjectives, conservative, disciplined, rigorous, are a different kind of information, and worth exactly what they cost to produce.

The Review asked, in effect, whether private credit's lending standards can withstand being looked at. Our answer is a table, updated quarterly, in public, checkable against the land titles register where Paper 05 shows every ranking claim can be verified. We think that is the standard the sector should converge on, and we are content to be held to it first.

SOURCES

Sources and method.

1 Reserve Bank of Australia, Financial Stability Review, March 2026, assessment chapter: growth of non-bank and private credit lending, the potential for higher loan losses ahead, and the limited systemic risk given the sector's size.

2 Reserve Bank of Australia, Financial Stability Review, March 2026, household and business chapter: competition in commercial property finance, loosened covenants and lowered presale requirements at some lenders, and more limited information on non-bank and private credit lending.

3 Reserve Bank of Australia, Financial Stability Review, March 2026: non-bank credit growth outpacing bank credit growth.

Method notes.

Summaries of the Review are paraphrases and the original text governs; page references will be pinned in the published edition. The disclosure list is Oxford's construction, informed by ASIC Regulatory Guide 45's benchmark model for unlisted mortgage schemes, which formally applies to retail schemes; this fund is wholesale and adopts the reporting voluntarily. The publication commitment covers the fact and frequency of publication; the format is subject to trustee and licensee approval. Nothing in this paper is a representation about the future composition of the fund's loan book.

Disclosure.

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