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Intelligence in Motion

How Agentic AI Will Reshape
the UK Mortgage Market

An independent research paper in
association with Ohpen and Cognizant

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Foreword



Jerry Mulle
Managing Director, Ohpen, UK

The UK mortgage market is at an inflection point. Not the kind that announces itself with a single disruptive event but a more consequential shift. Technology that has been circling the edges of an industry now finally has enough momentum, infrastructure and practical application to demand a serious strategic response.

Twelve months ago we held a roundtable of UK lenders which revealed a market that was curious but cautious. Many acknowledged there were things AI could do in the back office but there was a strong instinct to keep it well away from brokers and frontline decision making. The concern was partly regulatory, partly cultural – would people accept it? Would it behave as expected? Was the risk worth taking?

What has changed very quickly is general awareness and adoption. The vast majority of people are now using AI in their daily lives. Their ability to understand, accept and work with these tools has moved on at pace.

This paper is the product of a series of conversations with C-suite executives across lending, technology and financial services. It does not claim to have all the answers; nobody does. What it does attempt is something arguably more valuable at this moment – to explore the art of the possible, to ask what the short, medium and long-term priorities should be and to identify where the real barriers lie and how they might be addressed.

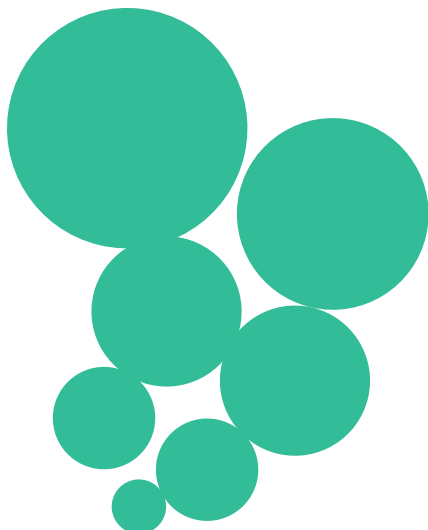
The purpose is to stimulate debate, encourage collaboration and help the industry think more clearly about where it goes next. If you are sitting inside a lender today with responsibility for AI strategy, it can feel like a daunting place. In many ways, it mirrors the early days of the internet, when banks were running war-game exercises on how they might put themselves out of business.

The difference this time is that the infrastructure is already in place. The question is no longer whether AI will transform the mortgage journey, it is whether the industry will shape that transformation or be shaped by it.



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Executive Summary



Precision is key

The UK mortgage industry needs to make a sharper distinction between the AI it already knows – generative AI, capable of producing content and answering questions – and agentic AI, which can independently complete tasks.

Rethinking the process

Most UK lenders are integrating AI into isolated parts of the process rather than rethinking the process itself. This is commercially understandable in the short term but creates strategic risk over time, particularly for those layering AI onto fragmented legacy platforms.

The short-term opportunity

Document validation, broker-facing Q&A tools, underwriter workflow support and quality assurance automation are all deployable today. These wins are low-risk, commercially meaningful and create the data foundations for more ambitious change.

The long-term destination

A source data driven mortgage journey in which customers authorise access to verified data once and the process flows from there – with credit decisions compressed from weeks to minutes and mortgages embedded naturally within the home-buying experience rather than applied for separately.

Cultural challenges

The most significant barriers are not technical. They are regulatory environment, governance, culture and organisational readiness. Boards need clearer frameworks for AI accountability. Subject matter experts need to be brought into the change process, not just informed of it. And AI investment needs to be reframed as a cost-reduction and revenue-protection tool rather than a transformation cost.

Structural challenges

The UK has specific and serious structural barriers to meaningful AI adoption. Estimates suggest around 1% of property data is currently digital, nearly half of all transactions fail to complete and the conveyancing process remains a significant drag on the end-to-end journey. These are not insurmountable but they require collective action from lenders, regulators, government and the legal profession.

Current state of play



The gap between consumer AI adoption and enterprise AI adoption has rarely been wider. Tools like ChatGPT, Perplexity and Gemini are embedded in daily life for millions of people. Enterprise adoption is a different story. Genuinely successful enterprise AI implementations remain rare and many of those presented as success stories are, on closer examination, more marketing than substance.

The root cause is structural. A task in everyday life such as reading an email, understanding it, drafting a reply is just one step in a chain of processes within a corporate function. Treating AI as another automation lever and applying it to an isolated piece of a process will generate value but it will be limited unless the process is rethought from the ground up.

Within the UK mortgage market specifically, the picture is one of fragmented experimentation rather than strategic change. Some lenders and banks have begun offering AI-assisted advisory tools for customers exploring mortgage options but these remain at a very early stage. The more common pattern is what might be called horizontal thinking. Lenders gravitate towards the edges of the value chain, pursuing document extraction, document compilation and content capture. They are tackling tasks in stages, initially automating steps within the existing process. Asking how AI could fundamentally transform the customer experience should follow through increased use of agentic AI.

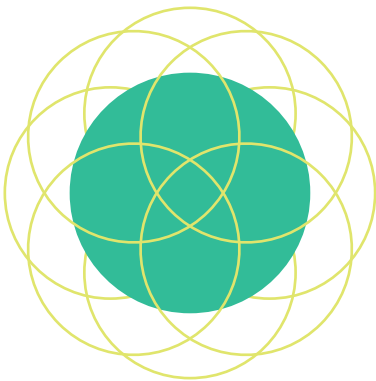
"At the moment, many UK lenders are understandably cautious. They are dipping a toe in here and there, integrating AI in small, isolated parts of the process rather than taking a more holistic approach. Commercially, that makes sense in the short term. But strategically, it risks making things harder over time."

The market is also beginning to segment in its response. At one end, very large banks tend to assume they can handle most of this internally. At the other, smaller building societies have very limited resource and budget but a clear understanding that this is a change-or-die moment. They know something has to be done but are often unsure what to do or how to fund it. Specialist and non-bank lenders occupy a different position again. For this part of the market underwriter judgement is part of the value proposition, so the goal is often not full automation but making the process as clean and efficient as possible while preserving the judgement calls that define their offering.

What is shifting and shifting quickly, is the weight given to AI strategy in procurement decisions. In recent RFP processes, AI capability has become the single most important decision factor for lenders evaluating platform partners. Twelve months ago, it would have been an afterthought at best. This tells us the market is starting to think more holistically, even if execution remains uneven.

The risk, as one contributor framed it, is not inaction. The risk is doing lots of small things without an overarching plan and then finding that when you are ready to move properly, you have made the journey more complex than it needed to be.

Reshaping our thinking



What do we mean by AI?

Before the industry can have a productive conversation about AI strategy, it needs to be precise about what it is actually talking about. The term "AI" is used to describe a spectrum of technologies with fundamentally different capabilities. Conflating them leads to both unrealistic expectations and missed opportunities.

At one end of the spectrum sits generative AI, which is good at creating pictures, videos or even 3D worlds. Large language models are capable of producing text, summarising documents, answering questions and drafting content. These tools are powerful and increasingly familiar but, while **generative AI** can answer questions and produce content, it cannot complete a task. Ask it to create a presentation deck and it will likely produce the content and suggest you build the deck yourself.

Agentic AI extends these capabilities with the result ten times more powerful. Ask an agentic system the same question and it will produce the deck. The gap between generating content and actually doing something with it is significant and it is the gap that matters most for enterprise transformation.

Within agentic AI, a further distinction is worth drawing between task-oriented agents and goal-oriented agents. A task-oriented agent performs a defined, bounded action – extracting the content of a document, for example. A goal-oriented agent is given an objective – "underwrite this loan" – and determines for itself what tasks need to be done to achieve it. Both types have a role and understanding which to deploy where is part of structuring AI correctly.

Type	Capability	Mortgage Application
Generative AI	Produces content; answers questions	Policy Q&A; broker-facing chatbots; document summarisation
Task-oriented agentic AI	Executes a defined, bounded action	Autonomous document extraction and data validation; fraud detection
Goal-oriented agentic AI	Pursues an objective autonomously	End-to-end underwriting support; case orchestration

Reshaping our thinking cont.

"The infrastructure is ready. The technology is capable enough to start. What is missing, in most cases, is the willingness to design for the destination rather than the next step."

There is also a third category that deserves attention: deterministic technology. Not everything in the mortgage process needs AI. Rules-based systems, workflow automation and structured data processing remain highly effective for predictable, well-defined tasks. The distinction between where to use deterministic technology and where to use agentic or generative AI is not yet well understood, even among sophisticated buyers. Getting that distinction right is one of the most important design decisions a lender will make. Deterministic logic is very effective at dealing with absolutes, for example loan-to-income ratios. AI is useful for parts of the process where more interpretation and context is needed, within predetermined parameters.

The destination that the most forward-thinking organisations are designing towards is what might be called an AI workforce: horizontal agents handling

specific tasks, vertical agents pursuing specific goals, all coordinated by an orchestrator, with the whole system auditable and governable. The enterprise that gets this right will not have made its existing process more efficient. It will have replaced the process with something structurally different.

A common mistake in enterprise AI design is assuming that one agent can handle a complex task end to end. Complexity is the enemy of accuracy in current AI systems. As a conversation thread grows longer, context degrades and output quality falls. The solution is decomposition: breaking complex tasks into many small, discrete tasks, each handled by a dedicated agent, with an orchestrator managing the overall workflow. This architecture – sometimes called multi-agent or role-decomposed design – is the structural foundation on which serious enterprise AI is being built.



Short-term roadmap



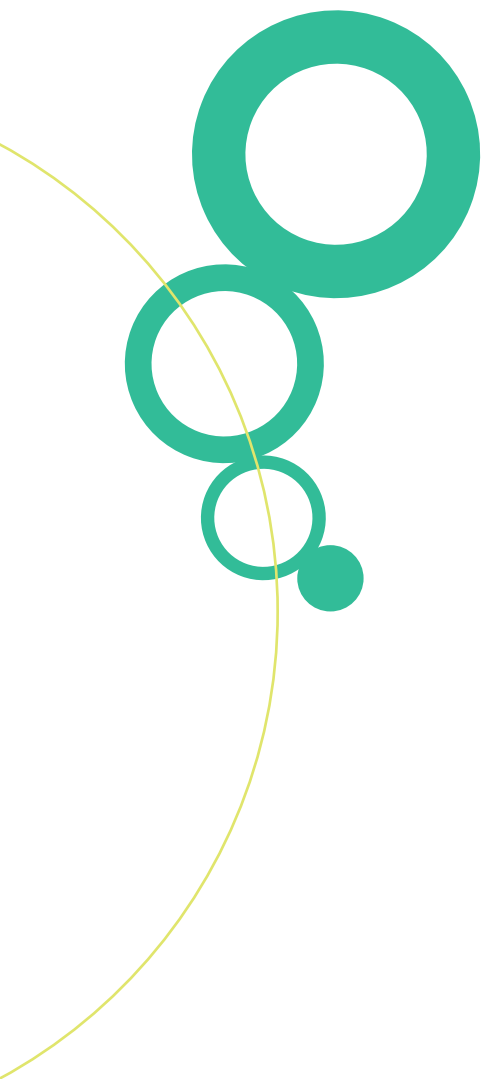
The immediate opportunity for UK mortgage lenders is not transformation, it is friction removal. The wins available today are practical, low-risk and commercially meaningful and they create the operational and cultural foundations on which more ambitious change can be built.

Document intelligence is the most obvious starting point. AI is already being used effectively to validate payslips and supporting documents in real time, checking consistency with application data and flagging potential fraud. This alone delivers faster decisions and better quality submissions, reducing the volume of cases that stall or fail due to incomplete or inconsistent information.

On the front end, AI can answer straightforward broker and borrower questions directly from lending policy, reducing call volumes and preventing avoidable errors before an application even starts. Where applications move into more complex territory, AI can co-ordinate requests for additional information and validate responses without manual chasing. For underwriters and operational teams, the immediate focus is on workflow automation and data presentation, structuring and surfacing the right information so decisions can be made quickly.

For organisations that feel paralysed by the absence of clean, structured data, there is a practical entry point that is often overlooked. Rather than attempting to build production AI systems from scratch, start with quality assurance. Every lender already runs quality checks on processed work. Applying agentic AI to that QA process first means the data is already there – thousands of processed loans that can be compared against regulatory requirements and internal quality standards. The system learns what good looks like, what standard operating procedures require and where the gaps are. In doing so, the organisation simultaneously generates the labelled data it needs to build production agents. The QA process creates the training ground for the production process.

Short-term roadmap cont.



The next phase is about transparency and speed earlier in the process. AI enables applicants to understand much earlier whether they are likely to be accepted and why, reducing wasted effort and failed transactions. Lending policy becomes machine-interpretable, allowing instant feedback on property characteristics, affordability and eligibility. Business users can define product rules and eligibility criteria in plain language, with AI translating intent into system configuration, significantly shortening product launch cycles and reducing dependency on technical teams.

"The risk is not doing nothing. The risk is doing lots of small things without an overarching plan and then finding that when you are ready to move properly, you have made the journey more complex than it needed to be."

The table below summarises the near-term deployment priorities as identified across the interviews.

Priority Area	AI Capability	Near-Term Benefit
Document validation	Task-oriented agentic AI	Faster decisions; reduced fraud risk
Broker and borrower Q&A	Generative AI	Lower call volumes; fewer application errors
Underwriter workflow	Task-oriented agentic AI	Faster case assembly; better expert focus
QA and quality control	Task-oriented agentic AI	Data generation; process improvement
Policy configuration	Generative AI	Shorter product launch cycles
Exception management	Task-oriented agentic AI	Reduced manual chasing; improved broker experience

Long-term adoption

"The destination is pretty clear. You have a connected universe of data where the applicant gives consent once and everything else flows from that. Income, assets, liabilities, property data – all pulled from trusted digital sources, evaluated against the lender's policy in real time. You know very early whether a case is going to work. Not after weeks of document chasing but up front."

The longer-term direction of travel is well understood even if the timeline is not. The destination is a mortgage journey that is fundamentally source data driven. Instead of customers repeatedly uploading documents, they authorise access to verified data once – income, tax records, bank transactions, employer details, assets and liabilities – through mechanisms such as the Payment Services Directive 2 and digital identity services. In an ideal world, this would enable instant affordability checks and remove much of the friction that exists today.

Property valuation also becomes real-time, using APIs connected to the Land Registry, Companies House and valuation data providers. This groundwork must be laid before AI adoption can be truly useful.

Together, these changes compress credit decisioning from weeks into minutes without compromising control or compliance. Mortgages become embedded rather than applied for, surfacing naturally within property search and home-moving journeys. Customers no longer think in terms of "applying" for a mortgage; relevant options are presented to them while they are browsing properties or planning renovations.

On the servicing side the shift is towards proactive, life-event-based engagement. AI continuously monitors signals such as job changes, family events, retirement or inheritance. Rather than waiting for customers to ask for help, lenders will be able to be proactive, offering relevant restructuring or refinancing options early enough to resolve issues before they occur.

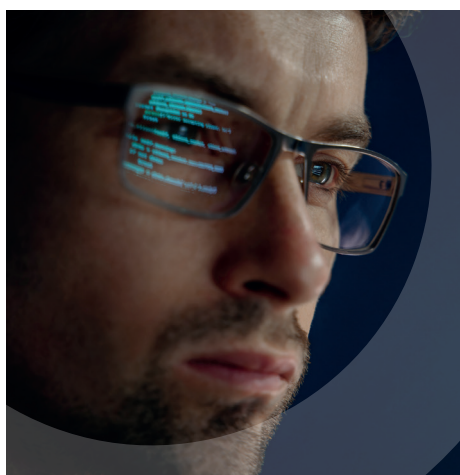
For buy-to-let lenders, regulatory requirements for landlords to improve rental properties' energy efficiency can be tracked and evidenced. This should evolve into an ongoing service rather than a one-off decision, with customers receiving nudges around energy-efficient upgrades linked directly to financing options.

Ultimately, the mortgage becomes part of a 360-degree financial hub, integrated with savings, pensions, insurance and investments – a living component within a broader financial plan rather than a static, siloed product.

The interesting question is how long the industry will take to get there. The pace of change is not being held back by the technology, it is being held back by adoption. Progress will depend on how quickly people learn to use these tools well, how quickly organisations are comfortable putting them into production and how quickly roles adapt around them.

"In AI terms, I think we are two or three years away from parts of this to feel very real."

Challenges at company board level



For many lenders, the most significant barriers to AI adoption are not technical, they are organisational, cultural and governance-related. They tend to be most acute at board level, where the combination of regulatory accountability, reputational risk and strategic uncertainty creates a particularly challenging environment for decision-making.

Regulators are understandably cautious after some high-profile technology failures and that makes boards nervous about large transformation programmes. The instinct is to wait for greater clarity from regulators and competitors before committing. But waiting creates its own costs and those costs are becoming harder to ignore.

The distinction between where to use deterministic technology and where to use agentic or generative AI is not yet well understood, even among sophisticated buyers. Before organisations start pushing AI into core processes, the compliance rails, the ethical rails and a shared understanding of what the AI is doing, how it is doing it and where the boundaries sit all need to be in place. Every lender already has policies around AI use, risk and areas of concern. The key is turning those policies into a clear, transparent operating framework.

"Transparency is critical. People need to understand when AI is involved, what data it is using, where that data comes from and how it is being analysed. That becomes especially important when you start evaluating mortgage propositions or making decisions that directly affect customers. If you get that right, it gives you the confidence to move much faster."

Executive sponsorship is critical but it is not enough on its own. Organisations also need subject matter experts across the business to buy into the change. In one recent building society transformation project, underwriters who saw automated document collection and validation in action still felt the need to print documents, sign them and file them physically, because that was how they had always worked. That discomfort is natural but it is also why organisations need to go through the internal change process first. If you try to drop new technology into a business that has not addressed those behaviours and mindsets, you end up creating a better version of the old process rather than a genuine step forward.

Challenges at company board level cont.

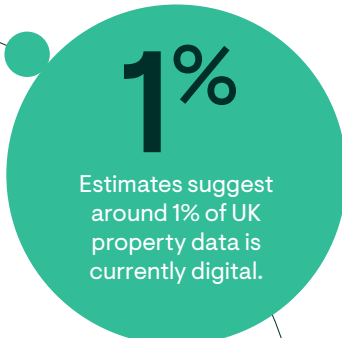
“ Cost is often seen as the biggest barrier when in reality AI can improve profitability.

There is also a structural question about how AI investment is framed at board level. Cost is often seen as the biggest barrier when in reality AI can improve profitability. Technology costs tend to fall as platforms scale and with a SaaS model, capability is shared across clients and paid for in line with volumes. The initial concern is often the upfront cost and the fear of disruption rather than the return on investment. Reframing AI as a cost-reduction and revenue-protection tool rather than a transformation cost is one of the more important shifts in board-level thinking that needs to happen. AI should be seen as the key initiative that will shape the future of the product. The decision is either to put full focus on it or face the consequences from competitors who do prioritise it.

The question of whether to build, buy or partner also sits at board level. Building in-house is expensive, slow and difficult to scale, particularly with ageing core and mortgage platforms. Buying point solutions can create fragmentation, increasing integration effort and operational risk over time. A partner-led model offers a pragmatic alternative: combining a mortgage platform with a systems integrator that understands the UK market allows lenders to modernise without taking on excessive delivery risk.



Adoption challenges specific to the UK mortgage market



1%

Estimates suggest around 1% of UK property data is currently digital.

The UK mortgage market has a set of structural characteristics that make AI adoption both more urgent and more complicated than in many comparable markets. Understanding these characteristics is essential to designing a realistic adoption strategy.

The first is the state of the data ecosystem. Estimates suggest around 1% of UK property data is currently digital. Land registry records, local authority searches and title information remain largely paper-based or in formats that are not machine-readable. This creates a fundamental constraint on how far AI can go in automating the property transaction. You can make every other part of the process slick and automated – it is conveyancing that causes timelines to stretch dramatically. Antiquated processes, duplicated checks, people picking up files halfway through and starting again all add friction. Unless that part of the ecosystem modernises, there is a natural ceiling on how fast the end-to-end journey can become.

"If you could genuinely digitise searches, title checks and conveyancing, you would move from transactions taking months to transactions taking weeks. But we are still some way from that."

The second challenge is the fragmentation of the data supply chain. Open banking is effective in simpler forms of lending where you can pull income and expenditure data, analyse it quickly and make decisions with a high degree of confidence. Once you move into mortgages, things get more complicated. Second incomes, overtime, self-employed borrowers, limited companies, complex tax arrangements – that data is harder to access and harder to interpret. Credit bureaux like Experian, Equifax and TransUnion are beginning to link into payroll data and other authoritative sources but at present only around 30% of applicants can go down that route. The capability exists but it is not yet universal. It is also not standardised across the market, with personal data held by different credit reference agencies varying in format and coverage.

“ The capability exists but it is not yet universal. It is also not standardised across the market, with personal data held by different credit reference agencies varying in format and coverage.

Adoption challenges specific to the UK mortgage market cont.



85%

Approximately 85% of people who saw their purchase collapse reported a financial loss

HMRC is probably further ahead than almost any other institution in this space. The infrastructure it has built holds much of the data lenders need. The challenge is joining that up with the private sector in a way that is legally sound, practically usable and trusted by consumers.

The failure rate for property transactions in the UK is unforgiveable. Research commissioned by Santander last year showed that around one in four homebuyers have experienced a property chain fail, costing consumers £560million each year, with a further £950million lost to the wider economy. Approximately 85% of people who saw their purchase collapse reported a financial loss, with the average at £1,240 per failed transaction. One in five people reported losses in excess of £2,000. The financial impact is not equally shared however. For lenders, failed transactions represent wasted processing cost. For brokers, they represent wasted time and unpaid work. For consumers, they represent thousands of pounds in legal fees with nothing to show for it. Conveyancers get paid either way.

If more transactions completed, profitability across the entire chain would increase materially. Government would receive more stamp duty, brokers would be paid and lenders would book the loan. The economic case for digitising the conveyancing process is compelling and AI has a significant role to play in triage, flagging complex cases that require human intervention while accelerating the straightforward ones.

The fourth challenge is the role of intermediaries. The broker market is large, influential and, in some respects, a source of both friction and quality. Brokers currently act primarily as product sourcers and advisers. As AI makes product comparison and eligibility assessment faster and more transparent, the nature of broker value will shift from process navigation towards advice, judgement and interpretation. The same is likely to be true for underwriters. Managing that transition commercially, culturally and politically is a challenge the market has not yet fully confronted.

Finally, there is the matter of legacy technology. Many UK lenders are operating on core systems that were not designed for the kind of API-driven, data-rich environment that AI requires. Layering AI on top of deeply fragmented legacy platforms is possible but it creates technical debt and limits the ambition of what can be achieved. The alternative – modernising the core platform as part of an AI strategy – requires a level of investment and board commitment that many institutions have been reluctant to make. That reluctance is becoming harder to justify. A crucial first step must be to build out API networks.



1 IN 5 PEOPLE

One in five people reported losses in excess of £2,000 through a collapsed purchase

Use Cases in the UK Mortgage Market



The following use cases represent a progression from near-term deployable applications to longer-term structural changes. They are drawn directly from the experiences and perspectives of the executives interviewed for this paper.

Use Case	Type	Readiness
Document validation and fraud detection	Task-oriented agentic AI	Deployable now
Natural-language policy configuration	Generative AI + deterministic logic	Deployable now
Affordability scenario modelling	Goal-oriented agentic AI	Near term
Proactive servicing and early intervention	Task-oriented agentic AI	Near term
Vulnerability signal detection	Task-oriented agentic AI	Near term
Source-data access replacing document upload	API infrastructure + open banking	Medium term
Risk-based dynamic process routing	Goal-oriented agentic AI	Medium term

Use Cases in the UK Mortgage Market cont.

"AI plays a key role in this by handling the clearly positive or clearly negative cases and flagging the ones that genuinely need human judgement. The outcome is a process that is faster and more efficient where risk is low, while still applying appropriate scrutiny where cases are more complex or ambiguous."

Autonomous document validation and fraud detection. AI ingests submitted documents, extracts data, checks consistency with application information and flags potential discrepancies or fraud indicators in real time. This is deployable today and delivers immediate value in reducing manual review time and improving submission quality.

Natural-language policy to business-rule translation. AI interprets lending policy written in plain language and converts it into executable business rules within the platform. Using deterministic logic and AI together allows clients to configure eligibility and risk logic themselves, improving scalability, reducing implementation effort and enabling faster policy changes. It also reduces the dependency on technical teams for what are fundamentally business decisions.

Affordability scenario modelling for borderline cases. AI runs multiple loan-to-income and affordability scenarios for "grey area" applications, testing options such as debt repayment, use of savings or sustainability incentives. This gives customers and brokers clearer insight into what changes could make a loan viable, reducing the number of applications that fail unnecessarily.

Proactive servicing and early-intervention nudges. By analysing behavioural and transactional data, AI identifies customers who may be heading towards repayment stress and triggers early, preventative interventions. This helps avoid arrears while supporting better customer outcomes under the Consumer Duty, shifting the model from reactive, punitive collections to earlier, more supportive engagement.

Vulnerability signal detection. AI acts as a signal generator on the servicing side, identifying behavioural changes that may indicate increased risk before problems become acute. This could include sudden shifts in spending patterns, changes in account usage or signals that financial control may have changed. The important distinction is that AI identifies where something has changed and where attention may be needed; judgement, engagement and action remain firmly with people.

Shift from document upload to source-data access. Using open banking-style authorisations, customers grant access to verified data instead of uploading PDFs. This improves data quality, reduces processing time and significantly enhances AI effectiveness across the journey. As coverage of payroll integrations and authoritative data sources expands, this use case moves from partial to near-universal applicability.

Customisable, risk-based process routing. Using data and early signals, the process adapts dynamically. For straightforward cases that clearly sit within affordability and risk boundaries, certain steps can be simplified or removed altogether. Where past experience shows that a broker consistently provides high-quality, reliable documentation, their cases could move through a fast-lane process with fewer checks.

Afterword



Jerry Mulle
Managing Director, Ohpen, UK

This paper has deliberately avoided the language of inevitability. AI will not automatically transform the UK mortgage market, it will transform it only if the industry makes deliberate choices about architecture, governance, collaboration and the pace at which it is willing to move.

What the conversations behind this paper made clear is that the technology is no longer the constraint. Previous technology innovations faced a common challenge. It arrived before the infrastructure was ready to support it. Blockchain and the move to cloud both followed this pattern but AI is different. The infrastructure is already in place. An estimated \$5trillion has been invested in building it and the hyperscalers such as OpenAI, Meta, Amazon and Grok have committed at a scale that has no precedent.

"Self-driving car technology existed years before it could be deployed because the supporting infrastructure was not ready. With AI, that constraint does not apply. The challenge now is adoption, not infrastructure. We've got the roads, we've got the vehicles – but nobody knows how to drive."

The challenge now is a human problem, not a technical one. Adoption requires boards who are willing to make strategic commitments rather than tactical experiments. It requires regulators and industry bodies to provide frameworks that enable responsible innovation rather than constrain it. It requires lenders, platform providers, conveyancers and brokers to recognise that the network effects of a more connected, transparent market benefit everyone and that the cost of fragmented, institution-by-institution experimentation is ultimately borne by the consumer.

There are also important questions that the industry has not yet fully answered. How should AI-assisted decisions be explained to consumers? Where does accountability sit when an agentic system makes an error? How do lenders balance the efficiency gains of automation with the obligations of the Consumer Duty? These are not reasons to pause, they are reasons to engage with regulators, technology partners and each other.

Looking further ahead, if quantum computing becomes a practical reality, that is the point at which artificial general intelligence becomes plausible. For now, the latest large language models are approaching a performance ceiling. Increasing model size is delivering diminishing returns. The next wave of progress will come not from bigger models but from better architecture – from the kind of multi-agent, role-decomposed design described in this paper.

The mortgage market is not short of intelligence but it is short of the courage to apply it differently. AI for the mortgage market is not about replacing people or fully automating complex decisions overnight, it is about progressively embedding intelligence into the journey in a way that is pragmatic, controlled and genuinely valuable – freeing up people to focus on cases where judgement really matters. AI handles the volume, the validation and the complexity that currently consumes so much human time and attention. The organisations that begin designing for that destination now will be the ones that define what the market looks like in five years' time.

If you would like to discuss any of the issues raised in this paper, please contact [Jerry Mulle jmulle@ohpen.com](mailto:Jerry.Mulle@ohpen.com)



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