THREE HORIZONS CAPITAL · RESEARCH

Judged on the Way Out.

Evergreen funds have become how wealth clients reach private markets. They are easy to get into, rationed to leave and hard to see. We read the way in, the way out, and what the US and European registers show.

+19.0% and +26.6%

Net flows into US interval and tender-offer funds over four quarters, as a share of assets, against +1.1% for listed closed-end funds

5% a quarter

The minimum an interval fund must offer to buy back; other evergreen wrappers set their own limits

28 of 335

ELTIFs on ESMA's register that publish a NAV

THE FINDING IN ONE LINE

For managers and wealth platforms building or selling evergreen funds: demand is real and growing, so the edge now lies in liquidity terms clients understand and in seeing clearly who runs what, and how much moved.

Three Horizons Capital, Portfolio Analytics. US funds that disclose, each fund's latest four reported quarters (mostly to March 2026); ESMA ELTIF register. Research, not investment advice.

01 "Evergreen" is an umbrella over several wrappers, each with its own way in and way out

Evergreen is the industry's word for vehicles that raise capital continuously and have no fixed end date. It covers several legal wrappers, each with its own liquidity rule.

WRAPPER	REGISTERED VEHICLES	HOW INVESTORS GET OUT
Interval funds (SEC Rule 23c-3)	276 (US)	Must offer to buy back at least 5% of shares each quarter
Tender-offer funds	121 (US)	The fund chooses when, and how much, to buy back
Non-traded BDCs	127 (US)	Quarterly repurchases at the fund's discretion
NAV REITs	Tracked by sponsor	Usually capped at 0.5-2% a month or 1.5-5% a quarter
ELTIFs	335 (ESMA register)	Liquidity tools set by the manager under the 2024 regime

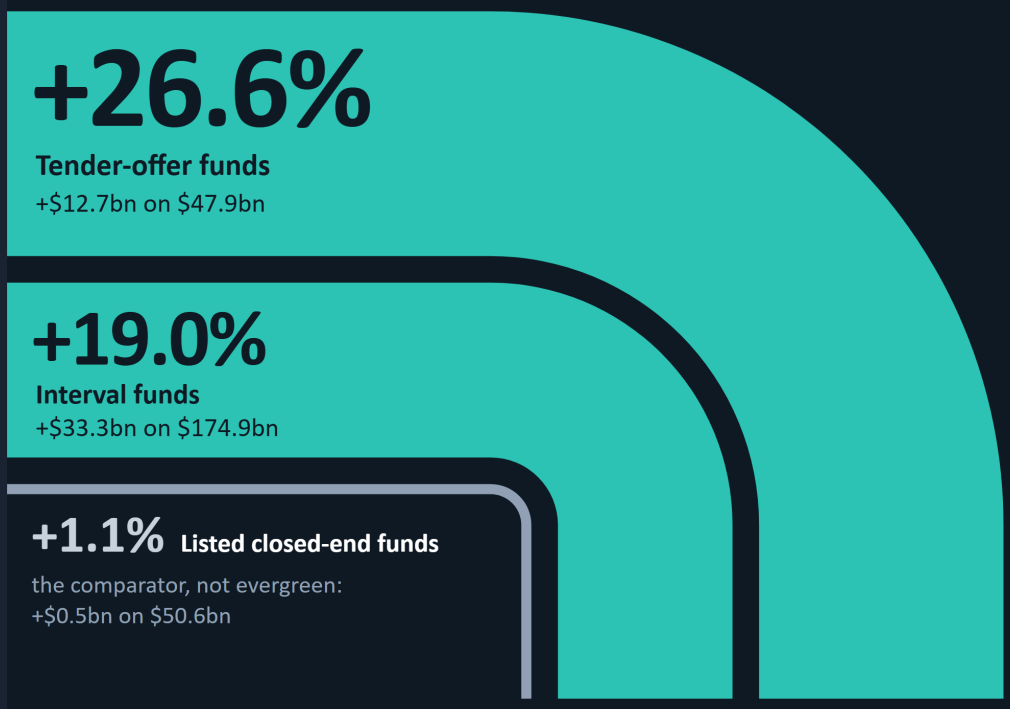
They share a pattern: subscriptions at NAV at any time, a NAV struck monthly or quarterly, liquidity that is periodic and capped and can be gated under stress, credit lines that bridge redemptions and new deals, and no maturity date. A traditional drawdown fund works the other way: capital is called over an investment period and comes back through distributions over an 8-12 year life.

02 Over four quarters, interval and tender-offer funds drew +$46.0bn while listed closed-end funds held near flat

Over each fund's latest four reported quarters, US interval funds took in a net +$33.3bn on $174.9bn of assets, +19.0%. Tender-offer funds took in +$12.7bn on $47.9bn, +26.6%. Listed closed-end funds, which have a fixed share count and serve as the comparator, took in +$0.5bn on $50.6bn, +1.1%.

Interval and tender-offer funds took in +$46.0bn in four quarters; listed closed-end funds +$0.5bn

Net flows over each fund's latest four reported quarters as a share of assets; band thickness on one scale



Source: Three Horizons Capital analysis of SEC and ESMA registers and fund filings. US funds that disclose flows, mostly to March 2026.

Together the two evergreen wrappers gathered +$46.0bn on $222.8bn. These figures cover the funds that disclose flows: 168 of 276 interval funds and 80 of 121 tender-offer funds.

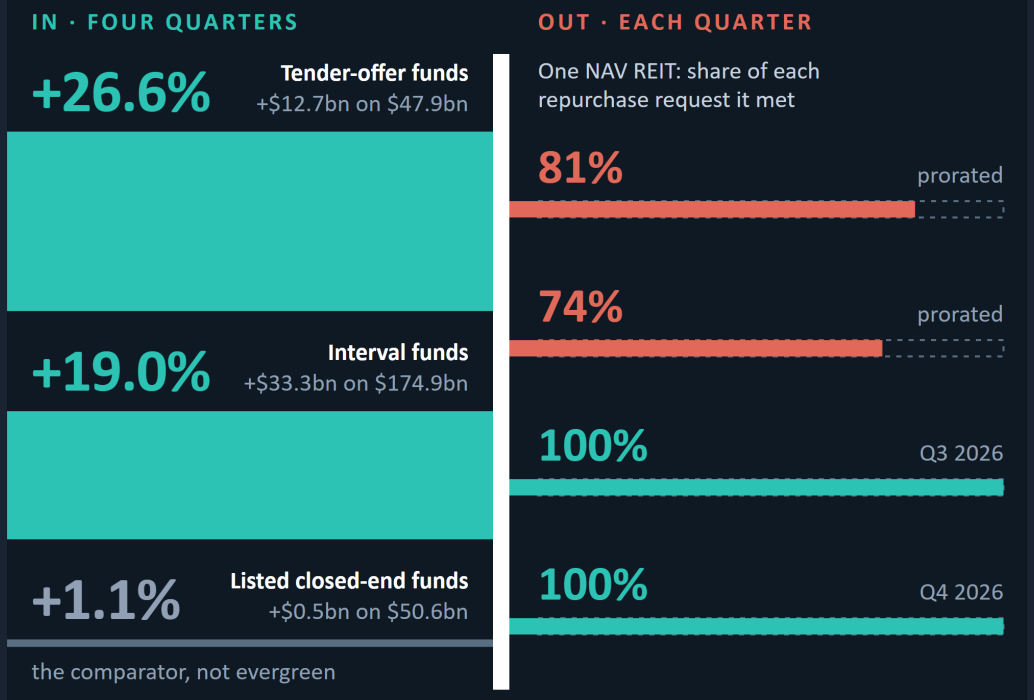
03 The way out is a schedule written into each wrapper's rules, and in 2026 one queue tightened and then cleared

Easy entry and periodic exit are two sides of the same promise. Because the assets are private and slow to sell, every evergreen wrapper limits how much can leave at once. An interval fund must offer at least 5% of its shares each quarter; a tender-offer fund decides for itself; a NAV REIT typically caps repurchases at 0.5-2% a month or 1.5-5% a quarter. Each can prorate requests, or gate, when more investors ask to leave than the limit allows.

The limits have been used. One large NAV REIT prorated two quarters in a row, meeting 81% and then 74% of each request, before meeting 100% in Q3 and Q4 2026. Another has, since April 2026, accepted repurchase requests only for death, disability and small accounts.

Money arrives continuously; one NAV REIT met 81%, then 74% of requests before meeting 100% again

Left: net flows in, as a share of assets. Right: share of each repurchase request one unnamed NAV REIT met, by quarter



Source: Three Horizons Capital analysis of SEC and ESMA registers and fund filings. The REIT is one fund, not the segment; its terms allowed proration.

This is not a flaw. It is how a private-asset fund stays open to new money without selling assets at the wrong time. The risk is a client who expects the exit to work like the entry.

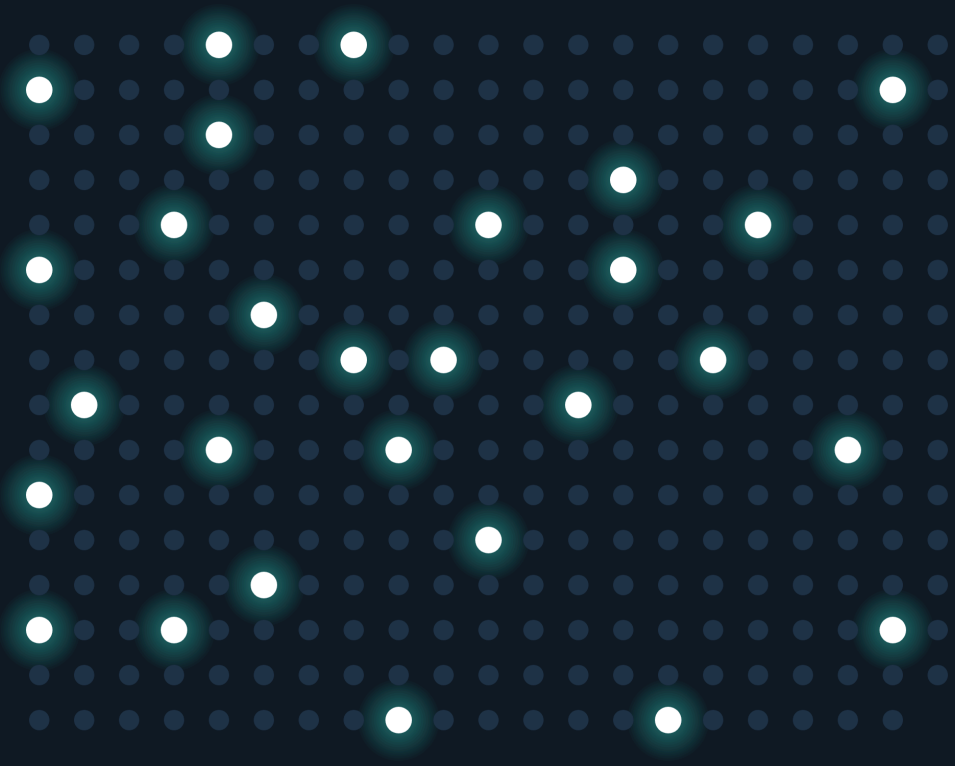
04 Disclosure rules differ by wrapper, so how much a register shows varies too

Disclosure rules differ by wrapper, and so does what the public record shows.

- **ELTIFs:** 335 are registered with ESMA and 28 publish a NAV. Luxembourg hosts 182, with about EUR 36.0bn disclosed by 18 of them; France hosts 89, with about EUR 465m disclosed by 7. The European total is a lower bound, concentrated in the largest vehicles.
- **Non-traded BDCs:** 1 of 127 discloses net flows in the registry we used, so this segment's pace of asset gathering, beside the interval and tender-offer totals above, cannot be read from it.
- **Interval and tender-offer funds:** the best covered of the group, with 168 of 276 and 80 of 121 disclosing flows.

Of 335 ELTIFs on ESMA's register, 28 publish a NAV

Each dot one ELTIF; lit dots publish a NAV. Positions carry no country or size meaning



Source: ESMA ELTIF register. In the US, 1 of 127 non-traded BDCs discloses net flows in the registry used.

05 The name on a register and the firm running the strategy are sometimes different

Knowing who runs a fund and knowing how much moved through it are two separate problems, and solving one does not solve the other.

Of the 12 largest registered ELTIF managers on ESMA's register, covering 116 ELTIFs, 9 are the operating manager, directly or through a parent. Two are third-party hosting platforms that run the fund on behalf of a strategy manager the register does not name; they account for 14 ELTIFs. One name needs further checking before it can be attributed. Luxembourg's 72 registered manager names therefore overstate the number of distinct operating brands.

In the US, we resolved the adviser behind 15 of 16 previously blank non-traded BDC entries: 13 named advisers, several of them among the largest alternatives firms, and 2 internally managed. It told us who runs those funds. It did not add flow data: net-flow disclosure is still 1 of 127.

Of the 12 largest registered ELTIF managers, 9 are the operating manager

The 12 largest names in the register's manager field, covering 116 ELTIFs, resolved against entity and parent data



- **9 operating managers**
- 2 third-party hosting platforms
- 1 needs further checking

The 2 hosting platforms run 14 ELTIFs for strategy managers the register does not name.

Source: Three Horizons Capital analysis of SEC and ESMA registers and fund filings.

06 Evergreen and drawdown returns need care before they are compared

Evergreen funds report a NAV total return; drawdown funds report an IRR built from cash flows. The two are not interchangeable. Evergreen NAVs are struck from periodic valuations, which smooth the marks, so a raw comparison tends to flatter evergreen risk-adjusted returns. Any comparison should adjust for smoothing and match strategy and vintage.

07 What changes for managers and wealth platforms

- **Sell the exit as carefully as the entry.** State the repurchase limit, the gate and the recent fill history in the first conversation, not the last.
- **Read flows by wrapper.** The fastest growth sits in interval and tender-offer funds; set your shelf and your competitors against the right peer set.
- **Know who really runs each fund.** Check the name on the register against the operating manager before you count it as exposure, competition or a distribution target.

> **IS YOUR EVERGREEN SHELF EASY TO SEE?**
>
> Send us the funds you run or compete with. We'll show flows, liquidity terms and who really runs each one, and walk you through it on a call in the coming weeks. Get in touch

08 What this does and does not show

This reads public registers and filings. It is not a view on any fund's prospects or returns.

- **Funds that disclose.** Flow figures cover the funds that report them: 168 of 276 interval funds, 80 of 121 tender-offer funds and 90 of 123 listed closed-end funds.
- **Each fund's latest four quarters.** Flows run over each fund's latest four reported quarters, mostly to March 2026; funds whose latest filing is older hold a small share of each group's assets.
- **Stock, not flows, in Europe.** ESMA's register gives counts and disclosed NAVs, not subscriptions and redemptions.
- **Redemption examples are dated.** The NAV REIT examples come from the funds' public filings and describe two funds, not the segment.
- **Returns.** We publish no return comparison here; the returns section above sets out the method a fair one needs.

09 What we measured

- **US flows:** quarterly fund-reported gross and net flows and net assets for interval, tender-offer and listed closed-end funds, summed over each fund's latest four reported quarters.
- **Wrapper counts:** registered US interval (276), tender-offer (121), non-traded BDC (127) and listed closed-end (123) funds; 335 ELTIFs on ESMA's register.
- **Attribution:** the 12 largest registered ELTIF managers resolved against entity and parent data; previously blank non-traded BDC advisers resolved from SEC filings.
- **Redemption examples:** two NAV REITs' 2026 repurchase and tender filings.
- Source: Three Horizons Capital analysis of SEC and ESMA registers and fund filings. Past performance is not indicative of future results. This paper is research, not investment advice, and not an offer or a recommendation to buy or sell any security.