

(Gen)Al adoption framework

Selection and implementation of use cases

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Introduction

AI strategy and adoption plan

A use case approach

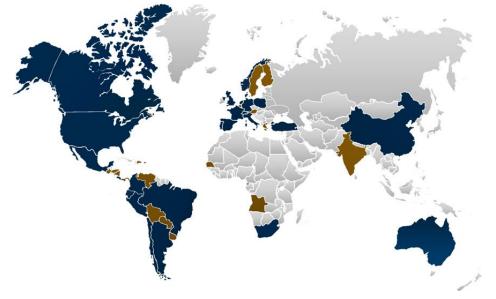


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Who is Management Solutions? Overview

Management Solutions is an international business consulting firm with operations in 50+ countries (46 offices), and a team of 4,000+ professionals working for 1,500+ clients around the world (600+ financial institutions)

We are an international firm...



America: Toronto, New York, Boston, Birmingham, Houston, Pittsburgh, San Juan de Puerto Rico, Mexico City, Monterrey, Querétaro, San José, Medellin, Bogotá, Quito, Sao Paulo, Río, Lima, Buenos Aires, Santiago de Chile, Panama, Uruguay Paraguay, Venezuela, Nicaragua, Honduras, Bolivia, El Salvador, Dominican Republic, Guatemala

Europe: Madrid, Barcelona, Bilbao, A Coruña, Málaga, London, Frankfurt, Dusseldorf, Paris, Amsterdam, Copenhagen, Oslo, Warsaw, Wroclaw, Zurich, Milan, Rome, Bologna, Lisbon, Belgium, Austria, Luxembourg, Sweden, Finland, Greece, Andorra

Asia: Beijing, Istanbul, Singapore, India

Africa: Johannesburg, Senegal, Equatorial Guinea, Angola

Oceania: Sydney

...with a team of talented and multidisciplinary professionals...

- International consulting firm specialized in delivering business and transformation programs across regulated industries (e.g., Financial, Energy and Telecom sectors).
- Globally managed multidisciplinary teams, which objective is to foster an organic growth and a strong corporate culture to ultimately offer high quality advisory services.
- Balanced pyramid with strong functional, mathematical and technical **capabilities**, with in depth expertise on delivery of complex regulatory programs.
- Strong relationship model with regulators and supervisors in Europe, the UK and the Americas.

...and extensive experience in regulated industries

- **Collaborating with:**
 - 9 financial supervisors worldwide: ECB, DNB, Bank of England, Bank of Spain...
 - 20 out the of the 30 G-SIBs (Europe and America)
 - 300+ D-SIBs (Europe, America, Asia, Africa and Oceania)
 - 600+ financial institutions in 50+ countries.
 - 500+ major corporates in Insurance, Energy, Telecom and other industries

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Permanent Presence

Management Solutions combines deep Al regulatory knowledge with advanced tech and quant skills, offering proprietary Al tools and expertise in model governance, recognized by top financial regulators

Management Solutions' differential capabilities in Al

- 1. Specialized team. MS has +1,000 data scientists who combine tech and quant skills with solid regulatory knowledge, certified in AWS, Azure and Google.
- 2. Frameworks. MS supports major companies and FIs in the adaption of their frameworks to AI and has wide experience in MRM, BCBS 239, GDPR, DORA, etc.
- 3. Experience with regulators and supervisors. MS is a "highly qualified external service provider" of the ECB, DNB and other authorities.
- 4. Al models under regulation. MS has developed and validated numerous Al/GenAl models for multiple uses: FinCrime, Credit Risk, Energy, RepRisk, etc.
- 5. Interpretability (XAI) and fairness. MS has extensive experience in the development of interpretable and fair models in the industries where it operates.
- 6. R&D area. MS allocates 10% of its capacity to R&D, co-founded the iDanae chair, researches on sustainability and efficiency in neural networks, among others.
- 7. Proprietary tools. MS has a suite of AI-powered tools, including ModelCraft[™] (AutoML and XAI); Gamma[™] (model governance, MRM); Hatari[™] (NLP and LLM).

Management Solutions' services in Al

Compliance with AI regulation

- AI Act, AI BoR, NIST gap analysis
- Compliance plan

Al strategy and framework

- · Al strategy and adoption roadmap
- Adjustment of risk appetite to AI
- Al governance and organization
- Al policies and procedures
- Al IT and data stack

Al risk analysis

- Explainability (XAI) dashboard
- Fairness analysis
- Al/GenAl validation and audit
- Al/GenAl monitoring dashboard

Al use cases

- Selection of GenAl use cases
- Piloting
- Cost-benefit-risk analysis
- GenAl deployment in production





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AI strategy and adoption plan

A use case approach







Organizations are exploiting massive amounts of data and developing (Gen)Al systems across industries and domains, which has to be aligned to the new regulation

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Development and use of Al

05 Al is being **used for multiple purposes** within organizations across all countries and areas.

IT and data stack 04

The increased complexity of AI models and higher computational requirements needs the setup of supporting **IT architecture**, infrastructure and data.

01 Regulation and supervision

Worldwide regulators aim to **establish a safe use of Al by promoting risk-based frameworks** to regulate Al applications, products, and services.

Al adoption strategy

Organizations are defining their **strategy to adopt Al** by comparing their current situation with regulatory requirements and best practice and designing a roadmap.

AI framework

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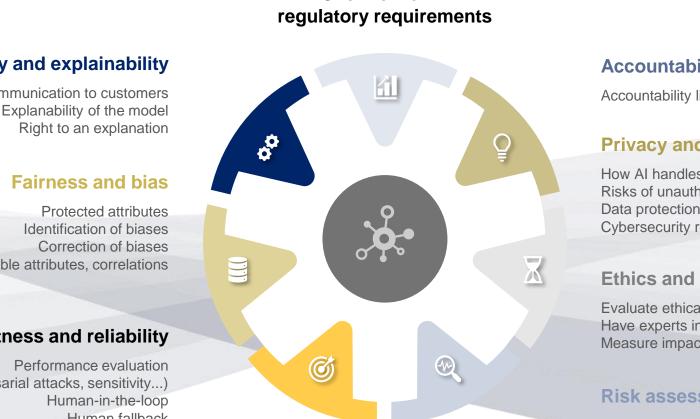
Using AI in an effective, safe and ethical manner requires **designing and implementing an AI framework** covering governance, organization, policies and procedures, continuous monitoring, etc.



Introduction Regulatory landscape: Main requirements in the AI Act

The AI regulation aims to address the potential risks, limitations, and ethical concerns associated with AI models, while promoting their responsible development, implementation and use

Overview of Al



Accountability

Accountability lies with the AI user

Privacy and security

How AI handles and protects user data Risks of unauthorized disclosure or misuse Data protection, consent, anonymization Cybersecurity requirements

Ethics and sustainability

Evaluate ethical implications of AI models Have experts in AI ethics Measure impact on the environment (e.g., emissions)

Risk assessment and governance

Assessment of all AI risks Audit and regulatory oversight

Transparency and explainability

Communication to customers Explanability of the model

Challenges: unobservable attributes, correlations

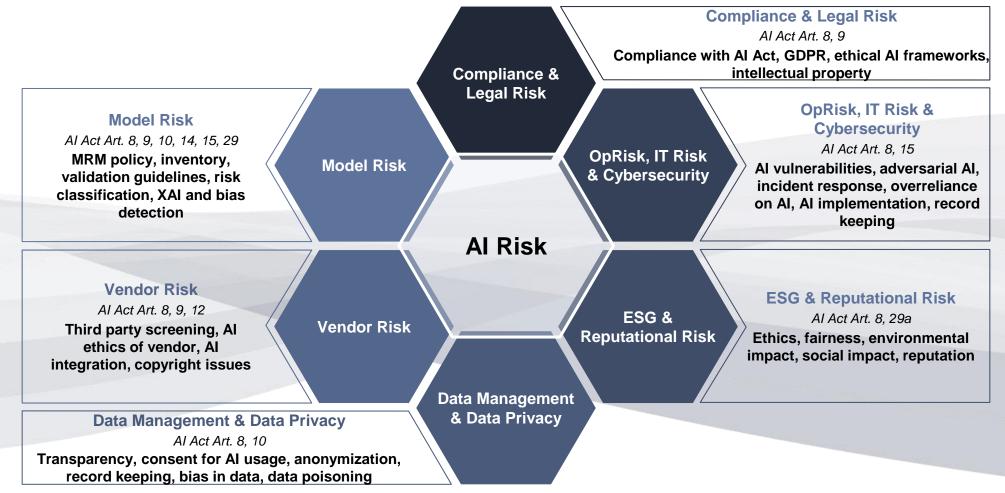
Robustness and reliability

Robustness (adversarial attacks, sensitivity...) Human fallback



2 Introduction Regulatory landscape: A 360 degrees risk assessment

Controlling AI risks involves identifying and assessing how AI amplifies current risks, and leveraging existing controls or defining new ones to minimize inherent risks



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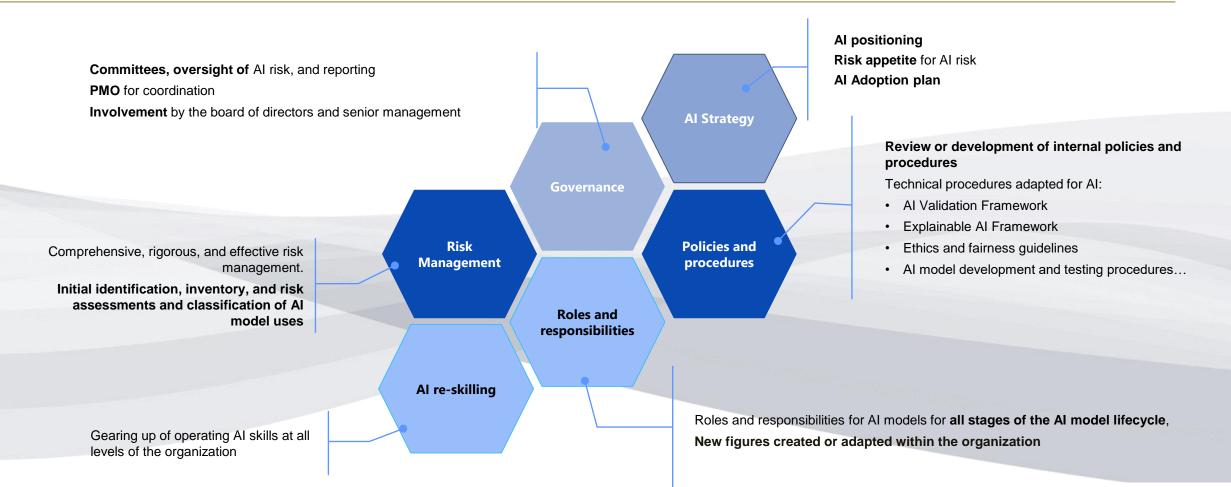




3 Al strategy and adoption plan Al Framework

Based on these regulatory requirements, the process for embedding AI within an organization starts with the development of an AI framework, and defining the necessary organizational, governance and procedural changes

Governance, policies and procedures, organization and regulatory changes



Making things happen



The AI technology framework should anticipate the key IT points for AI, in terms of infrastructure, architecture and data



Infrastructure

- · Selecting an efficient cloud infrastructure
- · Scalability, computational capacity, storage needs.
- · Specialized hardware, use of distributed computing and/or federated learning.
- Big Data infrastructures, and efficiently managing the use of the technological resources.
- · Flexibility and speed in terms of maintenance and update.
- · Monitoring consumption and costs; and controlling vendor risks.



Architecture

- · Transforming and evolving the architecture from legacy systems.
- · Design of an architecture that allows the efficient use of the infrastructure.
- Availability, maintenance and update of the different environments (development, test, production).
- · Efficient processes for development, production and update of the AI systems.
- · Ensuring the capabilities according to the needs of the AI Solutions.
- · Security layers (codes and data access, managing authorisations and permssions, cyber-attacks).

Data

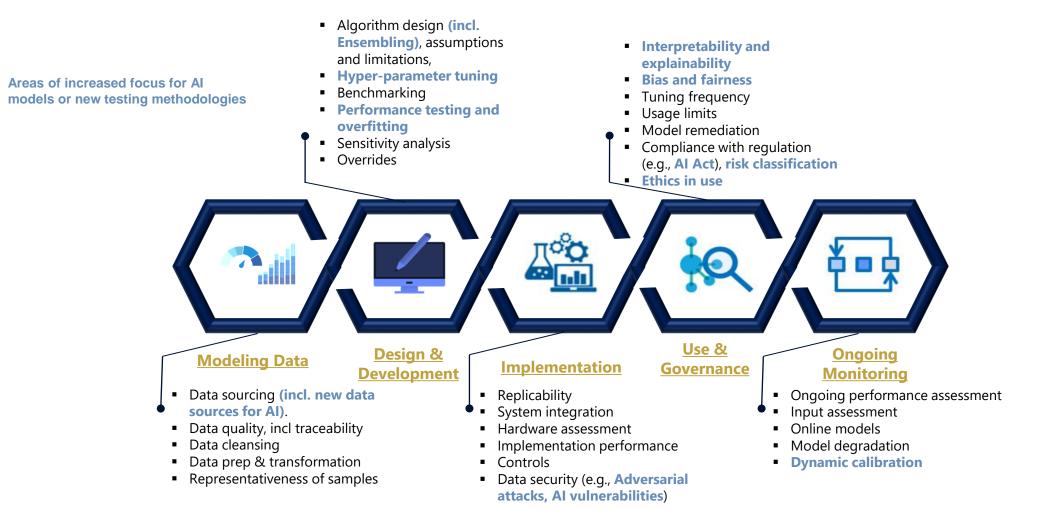
- Processes for capturing, acquiring, storing and updating multiple types of data
- Sources of information of different nature.
- Ensuring the high-quality of data, reliability, traceability, the avoidance of biases, data ethics, compliance to the regulatory requirements.



AI strategy and adoption plan

The lifecycle of model development and validation

The framework for AI model development and validation should cover, at a minimum, the modeling data, the design and development of the model, its implementation, use and governance, and the ongoing monitoring of the model



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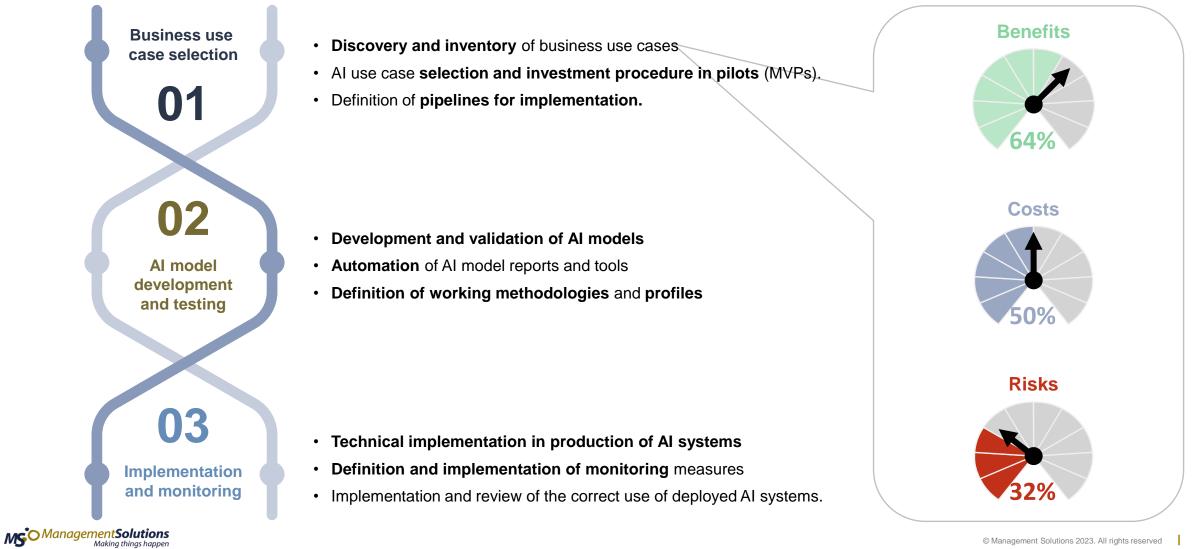
A use case approach







Management Solutions offers a comprehensive approach for AI adoption and a diverse array of AI use cases on efficiency, control, business, risk, finance, technology, operations, HR and ESG





The use cases of artificial intelligence span all areas of an organization, from business to audit, risk, finance or compliance

Customer and workforce intelligence	Efficiency and operational enhancement	Risk and compliance
Customer experience	Process industrialization	Financial risks
1. Customer-tailored marketing campaigns	1. 'Own GPT' (summarization, translation, doc chatbot)	1. AI-based credit granting, IRB and IFRS 9/16 models
2. Personalized financial advisor	2. Data extraction from large documents (e.g., funds, ESG)	2. Al-based collections model
3. Chatbot in customer service (client-facing / agent-facing)	3. Digitalization of highly unstructured docs (OCR+LLM)	3. Automated credit risk analysis generation
4. Client sentiment analysis through verbal/written feedback	4. Automated report generation from transactional data	4. AI-based portfolio optimization
5. Generator of trade sales pitch ideas via market analysis	5. Automated form filler (e.g., cybersec, VRM)	Non-financial risks
Process industrialization	6. Mail and documents classification	5. AI-based model validation
6. AI-based BI models (churn, cross-selling, propensity)	7. AI-based data quality (e.g., anomaly detection in reports)	6. Fraud detection in transactions (credit cards, payments)
7. Al-based customer behavior model	Tech innovation and solutions	7. AML alerts scoring (reducing false positives)
8. Audit of in/outbound calls via speech-to-text + LLM	8. Translator of code (SAS-SQL-Python-R) & data models	8. Cybersec threat intelligence (e.g., phishing detection)
9. Claims process enhancement via automated analysis	9. Biometric authentication	9. ESG&VRM rating based on AI-extracted controversies
Human Resources	10. Predictive maintenance (e.g., ATMs) based on data	10. Reputational risk measurement via NLP
10. CVs screening and ranking	11. Optimization of deep neural network training	11. Market abuse monitoring in trading data
11. Al-based people analytics (e.g., attrition, talent map)		Process industrialization and AI risk assessment
		12. Automation of Internal Audit processes
		13. Validation of LLMs
		14. XAI and fairness in AI systems

15. Vendor risk and op risk in AI systems

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A use case approach

Use Case: application of GenAI in Model Validation with GenMS[™] Scarlet

Management Solutions can create GenAl MVPs for Internal Validation, relying on GenMS[™] Scarlet as an accelerator (MS proprietary tool)

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- Generation of draft model validation reports based on the results of the validation tests and historical model validation reports
- Suggestion of draft findings based on input regulatory requirements and model development documentation.
- Suggestion of draft findings based on the quantitative results of the validation tests and suggestion of the severity of findings, based on previous historical findings
- Other functionalities:
 - Suggestion of regulatory requirements to support findings.
 - Chatbot to interact with the model validation reports
 - Explainability of the tool.

Reducing time and costs in the production of the model validation reports, allowing model validators to focus on multiple models on a shorter time period

Benefits

- Reducing the number of manual tasks during the model validation through automated reporting and documentation with flexibility
- Providing an exploitable database of previous model validations reports and findings, which can be easily consulted
- Improving the consistency in the assignment of the severity of the findings, and traceability of severities of similar findings historically
- Providing a preliminary list of regulatory findings to reduce time spent in model validation.

GENMS Scarlet



Streamline Your Model Validation Process

Scarlet is an Al-powered tool designed to assist model validators in conducting comprehensive and efficient validations. Upload your model documentation, validation templates, guidelines, historical reports, and applicable regulations to generate detailed validation findings and reports.

Note: Not all files are required. Scarlet will work with the files you provide.

Upload Files Model Documentation:

Validation Template:

Validation Guidelines:

Applicable Regulations:

Historical Reports:

Validate

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Validation Results

Here is a comprehensive list of validation findings for the IB Fees model based on the provided documentation:

Lack of Comprehensive Model Documentation

The model documentation does not fully meet the expectations outlined in SR 11-7 and SR 15-18. Key gaps include insufficient detail on model limitations, assumptions, and theoretical justification for chosen methodologies. More comprehensive documentation is needed to ensure the model can be understood and replicated by an independent party.

Severity: Medium

Applicable Regulations: SR 11-7 and SR 15-18

Comments: Thorough model documentation is critical to ensure models are sound, transparent, and can be validated. The documentation should be enhanced to fully align with regulatory expectations and leading practices.

Insufficient Validation of Key Assumptions

The model relies on several key assumptions, such as the stability of business mix and





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