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AI Governance and Security in Fintech: Ensuring Trust in Generative and Agentic AI Systems

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Abstract

As we welcome a new era of advanced generative and agentic AI technological capabilities we must ask whether the existing governance frameworks are fit for purpose to enable exploration in the public interest or whether the West is likely to reach premature closure of exploration, undermining trust in the potential for AI systems. The transformative power of AI is unquestioned. Yet, as we embark on a new era of increasingly capable generative and agentic AI technologies, there are serious concerns around the security implications of these technologies. At the same time, the investment market for AI tools is racing ahead, fuelling massive increases in the price of development and deployment in a bid to make the first market move, rather than making considered strategic decisions around risks versus benefits. Throughout their development, AI systems are being championed for their wide-ranging potential advantages for society, businesses and individuals and for their capacity to become ubiquitous with impacts across all spheres of human activity. However, how credible and realistic are these promised returns? With all such profound changes in society, we forget the lessons that have been hammered home over and over again with technology revolutions, from the invention of the printing press to the Industrial Revolution. The balance of risks and rewards do not follow a consistent pattern. And, in fact, the only thing we know for certain is that they create winners and losers at least in the short to medium term, often exacerbating inequalities in society and international relations with consequent knock-back effects for trust that take years to recover.

Keywords: Generative AI, Agentic AI, Governance Frameworks, Public Interest, Security Implications, AI Investment, Strategic Risk Decisions, Ubiquitous AI, Technology Revolution, Risk-Reward Balance, Societal Impact, Inequality, Trust in AI, Market Dynamics, International Relations.

1. Introduction

Generative and agentic AI systems are rapidly changing the way we interact with technology, taking on increasingly sophisticated tasks typically performed by humans. Fintech, the financial technology ecosystem that supports a myriad of finance-related tasks from payments to investing to regulatory compliance, is one of the first economic sectors to see widespread adoption of these AI assistants and will continue to develop symbiotically with them. While AI has been used in finance for years, the way it is changing niche point solutions into new generative AI-enabled ecosystems that can supplant whole categories of jobs poses unique challenges. Unlike other industries, the unique needs of protecting customer trust, concerns for security, and staving off the next financial crisis make responsible AI governance especially important in this sector. Although pivotal, the design of AI capabilities is only the beginning. Its security and governance are equally important areas to direct thought and effort. Without proper governance and security, our automated tools will not only fail to live up to their promise of increasing productivity and unleashing human creativity. They will also risk diminishing our customer base's trust in the AI tools we deploy and fundamentally undermine and destabilize the economy as a whole. Why are generative and agentic tools different than previous models? The advancement in technology and UX enables a wider swath of the population to use these new AI assistants and apply them to potentially sensitive work in finance. But the risks of these systems are not just a diluted version of their predecessors. This new generation of models is designed to be ever-closer collaborators, able to take on complicated subtasks and work with people to deliver ever-greater levels of productivity. Increasingly, more sensitive tasks will be done with the assistance of these AI systems, putting the economy's trust in Fintech to manage these tools securely and responsibly.

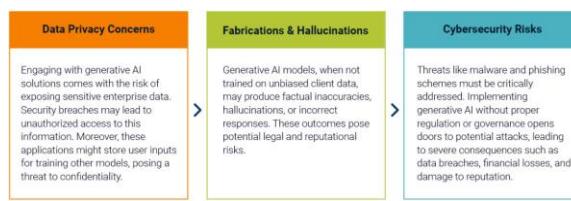


Fig 1 : Security and Governance Strategies for Generative AI

1.1. Overview of AI's Impact on Financial Technology

AI and AI systems such as Natural Language Processing and Large Language Models have taken on an increasingly wide variety of tasks in Fintech and have demonstrated the ability to perform those tasks well. From face detection and recognition for KYC requirements, Know Your Client monitoring, and screening for money laundering using image analysis; Chatbots improving customer experience; AI trading agents engaging in high-frequency trading; robo-advisors managing portfolios; to AI-enabled business decision-making using data mining and predictive analytics, AI is playing a central role in the functioning of the Fintech space and indeed the entire Finance sector. The much-forecasted exponential growth of Generative AI in the Fintech space and indeed the entire Finance sector is upon us. A report estimated that the Generative AI market would reach \$267 billion by 2027, growing at a compound annual growth rate of approximately 34 percent between 2022 to 2027, with the Finance sector being a key vertical market for the Generative AI industry. However, the rapid evolution and deployment of AI tools brings greater complexity, risk, and uncertainty, and it would be prudent to proceed with caution. For example, a report points to the downside risks of a sharp increase in dependence on third countries for critical technology and how the pandemic has strained the technological deck as well as the need to act quickly to mitigate these risks and cautions that these dependencies risk digital transformation, competitiveness and green transition, as well as sectoral resilience and security. This raises the important question of what form AI regulation should take and who mandates such regulations. If such regulations can even be put into place and followed through on, which is no small feat given the purpose, strength, and financial means of the many and varied companies that would be affected by such regulations. The importance of AI Audit and Trust has already started to be increasingly voiced by individuals and regulators alike and should be stepped up if we are to avoid the hurdles posed by AI alignment and AI governance problems.

2. Understanding Generative AI

Generative AI refers to a family of algorithms that can generate various types of content, from text to images, sounds, and videos, based on a generic pattern of any training data. It can generate short- and long-form text based on a prompt; similar models can also generate images based on a prompt or a set of input frames. These generative AIs are examples of narrow systems that can digest any training data and are trained to generate specific outcomes. They are different from general systems that are designed to think, reason, and act as humans, such as video games that can generate many lifelike experiences. The novelty of generative AIs is their ability to democratize access to very powerful and sophisticated AI capabilities, since they are not just tools requiring deep expertise in data science and AI to use. Rather, they allow anyone familiar with the desired outcome to specify tasks through relatively simple natural language prompts. Critically, they are not only simple and easy to use, they are also flexible; they can generate a diverse set of outcomes, can handle different modalities of data, and can be fine-tuned and customized.

From smart indexing and expert tagging, identifying customer credit limit, pricing, and risk profiles, selecting bank and insurance products, generating insurance proposals, assessing claims, providing customer support, fraud detection, sentiment analysis, mimicking and predicting customer behavior, recommending personalized products and services, to testing protocols, the financial services sector has creatively leveraged generative AIs to automate a multitude of business functions and processes. Generative AIs are capable of executing multiple tasks simultaneously, quickly processing massive amounts of structured and unstructured data, and generating custom deliverables. For instance, fintech companies could utilize generative AI to build, train, and manage personalized credit underwriting, customer service, and fraud detection agents, reshuffling current functions in excruciating detail. This promises to help banks and NBFCs provide a seamless omnichannel digital experience, reduce operating costs, augment the expertise and creativity of financial professionals, and rapidly develop new products.

Equation 1 : Trust Score Computation

$$T_s = \alpha \cdot C_r + \beta \cdot A_t + \gamma \cdot E_x$$

Where

T_s : Overall Trust Score

C_r : Model Compliance Rating (with regulations)

A_t : Model Auditability (transparency and traceability)

E_x : Explanation Quality (e.g., SHAP/LIME-based interpretability)

α, β, γ : Tunable Weighting Factors

2.1. Definition and Characteristics

Generative AI stands for a class of artificial intelligent systems capable of creating new and original content through the reflection of human thought processes. Generative AI is not autonomous in the sense of having a mind of its own and being a sentient creature; in its current form, it is simply an agentic tool that transforms instructions provided to it into finished content. Generative AI is a specific subset of a more expansive class of agentic AI systems that are intellectually autonomous. An agentic AI system is capable of receiving inputs, making decisions according to risk tolerance levels

scripted by users, and then carrying out actions on behalf of its human creator. Generative AI systems are those agentic systems that create or generate products, such as text or images, rather than make decisions strictly. With large language models embedded in such systems, it serves as an excellent example of a general-purpose technology. Generative AI is now integrated with a multitude of tasks and domains. Generative AI is not limited to creating text, as is the case with many language-model systems. Generative AI can create other types of content, such as computer code and images. Generative AI is capable of replicating human activities that embed more complicated design tasks, such as the production of realistic imagery of digital environments and the creation of novel advertising copy.

Generative AI refers to artificial intelligence systems capable of generating original text, images, audio, and similar real-world content using algorithms and human-led processes. Such generative AI systems use deep learning through neural networks to analyze and produce outputs using large language models embedded within it. Inherent in machine learning models such as deep neural networks and the natural language processing models that support relationship development and text generation are shortcomings. Specific limitations include the fact that machine learning models are black boxes; their analysis and behavior in developing the correlations between inputs and outputs are not readily observable or understandable by users. Although performance of the algorithm is observable, users cannot completely comprehend the generalization on which the model performance is based. Design and data issues also present risk matters for deep neural network systems and AI systems using large data sets in general.

2.2. Applications in Financial Services

With recent advancements in deep learning and other model architectures, the scalability of generative AI systems has been proven through the release of large language models in various domain applications. In domain-specific large language models, self-supervision on large scale instruction datasets reveals impressive capabilities in becoming zero-shot learner agents, able to carry out a wide range of previously unseen tasks, or serve as versatile backbones for transfer learning through fine-tuning on downstream tasks. Since inception, the financial services industry, specifically areas of accounting and audit, regulation technology, investment management, insurance, credit assessment, capital markets, financial management, as well as compliance, have been actively researching and investigating into generative AI applications for its desirable efficiencies. However, the domain of financial services recognizes itself for boundaries set across core tenets of minimizing risks, including those from legal liabilities, security breach and heightening opportunities for frauds. As such, care must be given to the decomposable subsystems within a financial service chain and its corresponding application potential. Recently, a report outlining six avenues that seen immediate promise: real-time customer service, claim filing, data extraction and summarization, knowledgebase interaction and enrichment, transcribing of live discussions, and clinical task automation. Notably, these areas are primarily distributed through frontend customer engagement, and augmentations of internal operations pipelines.

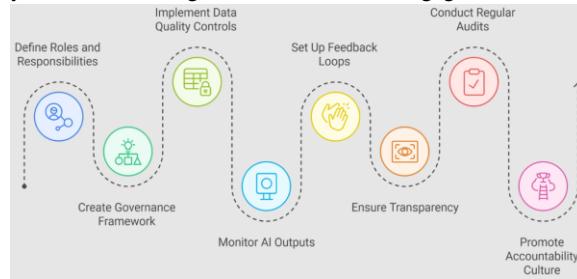


Fig 2 : Financial Reporting with Generative AI

3. Agentic AI Systems in Finance

Overview of Agentic AI

Humans have relied on technology to aid and improve efficiencies across many tasks. As we have transitioned to the new paradigm of generative and large language models (LLMs), we have moved from auxiliary tools to increasingly capable technology that can act on our behalf and with little human interaction. Specifically, an agentic AI is a system that exhibits autonomous capabilities (i.e., planning, reasoning, automating, or self-improving) and accomplishes open-ended goals, both simple and complex, that can include interaction and collaboration with humans. Agentic AIs can be chained together in a series of function-calling “steps.” For example, an LLM can break down a problem into subproblems and call a tool with a clear plan to complete the action. These tools could comprise specialized LLMs that communicate as agents with LLMs and other specified algorithms to work in coordination (where a tool is defined as a procedure or mechanism for obtaining an objective).

This idea of automating capabilities may be unsettling to some who see AI as agents for harm and exploitation. Today, we primarily transpose labor or capabilities to agents in numerous task categories, including text generation, image generation, coding, sales, data analysis, and customer onboarding. Authoring assistants to augment our text-generation capabilities have proliferated across many domains. Image generation technology has created web-based designers to build out websites and multimedia portfolios for content creators. Cyber agents have been built to automate away cybersecurity labor, allowing the “human in the loop” to be notified for actions concerning alerts of what could be harm. In finance specifically, a wealth of use cases have emerged, where agents are automating and staking large and sophisticated models to transform the overall capabilities of banks and fintech companies.

3.1. Overview of Agentic AI

Over the last couple of decades, artificial intelligence (AI) has been gradually moving beyond the realm of tools and into the realm of partners that operate alongside or, in some cases, on behalf of people to help them solve problems. Still, the interaction design of traditional AI tools continues to impose an important limitation; humans must be in the loop to direct all the activity of these systems. AI agents, which mimic or augment human

decision-making and act autonomously, are a distinct class of AI that crosses the frontier from augmentation to delegation. In this essay, we refer to a specific subcategory of AI agent – agentic AI – to define autonomous safety-critical systems imbued with levels of general interaction flexibility or intelligence that any reasonable individual would consider they have, or are close to having, agent-like properties or capabilities.

The term Agent refers to a computational system that executes tasks and can operate autonomously or with some level of autonomy to a human entity. Agents may be reactive, deliberative, and/or hybrid. An Abstract Autonomous Agent can be classified according to types of modeled contexts and actions related to supported tasks. In an abstract sense, an agentic AI system is capable of real-time perception, understanding, reasoning, executing, learning and has access to tools to act and creates effects in the world. In short, agents enhance their state and dispositions of hardware-software setups or agents-in-the-loop to perform a plethora of everyday digital tasks on behalf of users. They can sense, act, and sometimes converse and display in natural language, vision, voice and generate outputs to automate actions, artificial intent and decision-making styles that have consequences in the real world.

3.2. Use Cases in Fintech

Agentic AI systems are shedding light on possible applications in fintech and financial services. For chatbots, there is a clear distinction between queries which can be satisfied based on search, keyword matching, or simple flows, versus queries which require a more comprehensive grasp of the user context and question at hand. There is an expectation that the latter will increasingly become agentic, relying deeper on pretrained LLMs.

Recently, a number of advanced financial chatbots have launched. In addition, LLMs support multimodal input and output, and can facilitate both textual dialogues and interactive analysis of numerical data.

In the future, financial and investment management tools may be transformed through advanced agentic AIs. By providing intelligent dialogue interfaces on top of data-rich web applications, they streamline the complexity of investing and trading. Unlike high-frequency trading, which relies on automated algorithms, investing fundamentally cannot be automated within a set framework, due to the need for constant monitoring, analysis, and evaluation, affecting the decision. Agentic AIs, built as specialized consultants, have the potential to guide actively the investor on the relevant aspects and act as partners.

In addition, asset or fund management, typically requiring expertise and judgement, time, and a large amount of investment constitution, may also be impacted. Emerging tokenized investment funds may leverage generative agentic LLMs to provide an interactive level of service, and influence an investor's decision process with a direct action on the funds' smart contracts. Automated tax and accounting services may also be transformed by the use of LLMs trained specifically on the local accounting regulation.

4. AI Governance Frameworks

Recent actions undertaken by legislators and regulators signal increasing scrutiny of AI services and models for their potential to cause harm, especially when used in high-risk areas. In light of 2022 events like the release of generative AI systems and the perceived harms that stemmed from their release, and also the increased interest in liquid and allied-risk systems, the first generative AI application for which a complaint was made to the prevalent online content platform moderation authority, ongoing work examining AIs in the context of surveillance feedback and reliance on optical data such as image processing and facial recognition by some of the largest technology companies in the world, increasing scrutiny on risky services, and widely public critique of AI systems by stakeholders from across society, we believe that the time has come to ask a more general question: what if anything should be done in the larger field of regulation and governance of AI entities? This calls for looking at existing policies and best practices for AI governance and security.

Policymakers are developing AI frameworks and regulations at both the EU and national levels, in addition to industry-led frameworks. The EU AI Act is now entering trilogues and will inform countries interested in proposing their own legislation. The US National Institute of Standards and Technology has released a voluntary AI Risk Management Framework and the National Strategy on AI aims to ensure the development of trustworthy, reliable, and responsible AI. The OECD and private sector stakeholders have issued guidelines that aim to create human-centered AI, damaging only those least hurt, and commending efforts on organized transparency or risk tiers. There's also discussion around 'best practices' for how companies slope their AI systems – required transparency, governance processes, risk assessments concerning vulnerabilities, harms, and mitigation processes/settings. In fact, some other concepts for general AI accountability are drawing interest, especially combining and building on elements of accountability: auditing and certifying randomized model evaluations with model-steering property spaces.



Fig 3 : AI Governance

4.1. Regulatory Landscape

The development of new technologies in the financial services has long been accompanied by the question of how to properly govern them. In fact, a key motivation for the establishment of financial services regulation is that activities which are carried on in an unregulated manner may pose risks to the wider public without any corresponding benefit to the public or merit to the markets. The concept of “shadow banking” with respect to financial services refers to the idea that there may be competently equivalent institutions within the financial services ecosystem that do not fall under the purview of regulators, but which are nonetheless likely to impose risks onto the market and onto customers directly. Until the financial crisis, the so-called “shadow banking” system was mostly expanded by entities that were similar to banks in their operation and their intermediation role, but that were neither licensed to do so nor licensed to take customer deposits. However, in the wake of the financial crisis, regulators also began paying increasingly attention to the wider financial ecosystem as a means of systemic risk regulation. Such attempts of a holistic approach at systemic risk control can be viewed as the precursor of the now generally discussed idea of fintech “regulation by proxy.”

At the same time, however, it is also clear that increased reliance on technology solutions and new technology-led business models also affect the nature of many of these traditional risks in new and different ways. It is particularly through this lens of financial services innovation and the use of advanced technology solutions that regulators now have to shape the regulatory regime design question for the digital financial services ecosystem. It is this paradigm of financial services innovation that guides the rest of this Section. While it was only natural that supervisors initially focused on the normative aspect of their role, it has become clear what a potentially detrimental effect the absence of clear-cut regulation on the creation of certain products – especially in the field of crypto – may have.

4.2. Best Practices for Governance

Algorithmic governance will require close cooperation among regulators, distributors, industrial players, and end customers in order to optimize practices and eliminate friction. In particular, for the financial sector, insights into potential regulatory measures, developed in parallel by both the public and private sectors, focusing on both the limitations of the technology and the actual risks of recent developments, would be welcome. Regulatory guidance, currently still at an embryonal stage globally, should and could contribute to a faster and more standardized implementation of effective risk mitigation measures. Perhaps surprisingly, the FinTech and Financial Services sector are areas leading the way in exploring the adoption and regulatory oversight of more sophisticated techniques for AI governance. Sustainable supervision of meritocratic trusted AI decision systems will require not only the distributed governance models employed today, supervised through the technology building blocks, but more also. External and internal auditing frameworks not only for core technological building blocks but also sophisticated techniques with metric CAPTUR to deliver TRRR – Trustworthiness, Robustness, Resilience and Resource Awareness – will be key enablers to wide-scale compliant, responsible and ethical utilization of AI. Introduction of the so-called “ethical limits” of the technology will require the use of focused application and scenario and level-of-certainty based dashboards, controlled by the governance models to be adopted, gathering data of appropriate quality to support a definitional breakthrough.

5. Security Challenges in AI Systems

AI-enabled financial services pose security vulnerability issues within two areas: data privacy and cyberattacks. The financial services industry is the industry with the largest number of data privacy work-related losses, including insider and customer theft. Front-end system in security operation environment and data hosting in cloud experienced the largest data privacy incident counts in financial services. The development of AI systems require large amounts of sensitive and highly regulated data, such as Personally Identifiable Information and Private Health Information, particularly for Natural Language Processing. Security protections to safeguard privacy data to the AI service development process, as well as the AI systems supported services, are critical to avoid data leakage.

Another area of security vulnerability for AI systems is cyber attacks, which can pose a risk both using AI for the attack, or modeling an AI-based system for attack. Generative AI can be used to automate the script generation process for malware. For some other cyberattack scenarios,

undesirable behaviors and outputs are of security concerns, including low-data scenarios, prompt injection, backdoor attack, adversarial example, trojan model attack, model poisoning and data poisoning, membership inference attack, and national security. In addition, a chat-based generative AI system has been drawing high-profile attention for its many applications, models branding and content moderation. Numerous companies have expressed their desire to partner to utilize these applications.

Equation 2 : AI Risk Quantification Metric

$$R_{AI} = \sum_{i=1}^n w_i \cdot P(E_i) \cdot I(E_i)$$

Where

R_{AI} : Aggregate AI Operational Risk

E_i : Identified Risk Events (e.g., model drift, misuse)

$P(E_i)$: Probability of Event E_i

$I(E_i)$: Impact of Event E_i

w_i : Risk Weighting for Event Type

5.1. Data Privacy Concerns

Data protection principles ensure the data subjects' rights and privacy adequately. It is essential that AI investments respect data protection principles. To deliver more informed and personalized services, generative AI systems need a big volume of high-quality and well-labeled datasets. In certain situations, this data is considered personal data and is subject to special legal protection measures to guarantee data subjects' rights. Given the rapidly evolving landscape around generative AI, organizations need to reassess the AI data management lifecycle. They must make certain that any significant changes in processing practices related to the volume, type, or sensitivity of personal data being used to create generative AI solutions are properly reviewed and addressed by their data protection compliance program appropriately. While applying AI technologies to address business challenges can drive great value, some use cases require careful consideration. For example, customer service solutions that utilize AI-generated responses based on company data can raise potential concerns regarding the security of confidential, sensitive, or regulated information. Legal counsel may evaluate and draft relevant policies or procedures, and products or services that require sensitive data to provide a reasonable solution may increase the likelihood of breaching provisions, potentially resulting in severe sanctions. Normally, AI applications within a business do not require the collection of an options user's most sensitive personal information. However, a few machine learning algorithms demand large amounts of data, and developing those algorithms might require sensitive data.

5.2. Cybersecurity Threats

In order to offer better products and services, Fintech companies have the habit of resorting to more sophisticated AI solutions which usually are hosted on the cloud or work in a hybrid environment, which increases the threat of exposing sensitive data. A scenario that is relatively new is that cybersecurity threats are now targeting the AI systems per se, either by affecting their data stores or the very algorithms that feed the AI systems. The traditional cyber-attacks directed to steal sensitive data, more recently referred as Data-Centric Attacks, now have the AI models as top target. Actually, these models are complex structures and possess a wealth of confidential information in the form of their parameters. The fact that these models are constantly trained with sensitive data makes them susceptible to reverse engineering. This intellectual property can be utilized for a multitude of illicit purposes, ranging from social engineering to loss of competitive advantages.

However, the sophistication of using the AI models as the attack pathway introduces a new dimension to the traditional problems of confidentiality, integrity, and availability of sensitive data. Instead of simply being an onlooker of the usage of the model in real time, bad actors are exploiting access to the models in order to manipulate the training data, aiming at a long-term corruption of their structure. One of the main infrastructures that support AI models in Fintech companies is the cloud. The high-profile nature of these associations brings bad actors with incentives to use brute-force techniques in order to bypass the access control safeguards on cloud services. Denial of service is also another typical attack aimed at cloud services, including the infrastructure supporting Fintech firms AI operations.

6. Building Trust in AI Systems

The emergence of agentic AI systems, particularly those capable of decision-making in high-stakes areas such as fintech, leads us to demand trust in such systems. If we lack mechanisms to build such trust, the opportunity seen in improving efficiency in specific high-risk processes, or democratization of tools to support user efforts in their financial interactions through systems capable of performing functions previously not envisioned will be lost. Who would be willing to use AI systems if there is no recourse, if such systems then behave in a specific manner leading us to harm? What would be the business model of operators of these systems? Can we envision the space of AI uses in risk and safety domains with these unrepentant AI actors making up our ecosystems as similarly empowering? Can safety and safety concerns of these systems be separated from questions of who is training and then using these systems?

This leads to the consideration of transparency: at what level should we intervene, and how? Transparency of systems have long been promoted inside the field, and outside fields that rely on software implementations and extensive online services and interactions. Simple heuristics have been proposed that decide on the visibility of an AI system's learning, assumption and rule modeling processes according to the possible impact of the

decisions made by such systems. But the kinds of models and functions being learned and inferred by these systems is not transparent even to the modelers. This has prompted the push towards end-user model explainability, good enough explanations and the use of proxies that can be interrogated, themselves explained. How would then the transference, interactivity and dynamic learning functions of agentic systems such as these play into model transparency and explainability? Building on recent feminist analytics around models and choice we describe these interactions in section 6.1.

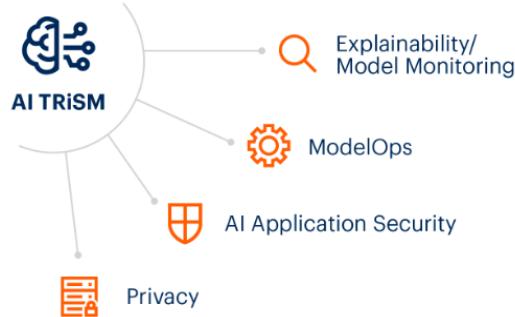


Fig 4 : Building Trust in AI

6.1. Transparency and Explainability

The concept of explainability, also referred to as interpretability, is crucial for developing trust in and managing various security and safety considerations for AI systems. However, as with many concepts in the field of ethics, security, and safety in AI research, its definition can vary significantly. Whereas transparency is needed for others to see what underlying models an AI agent works with, how the agent learned that something is worthy of recognition or how it reached a certain decision, etc., for providing explanations and obtaining an overall frame of reference, interpretability is essential for the understanding of human users, interaction partners, and affected parties and may have other layers depending on the addressees from different disciplines and backgrounds. Given the broad, interdisciplinary nature of AI implementation, the need for different kinds of explainable AI is widely acknowledged, and state-of-the-art ML models are steadily developing improved approaches to support different types of explainable AI. These range from locally explaining the characterizations of individual image, audio, and video material, to transparently uncovering why a specific person was negatively recognized by a facial recognition AI, etc. Sufficient degrees of human-centered explainable AI are created by balancing enough accuracy, plausibility, and post hoc fidelity of the modeling throughout the development and learning process of a generative AI in tandem with transdisciplinary support for trust establishment throughout subsequent stages involving potential users and affected parties. For any trustworthy human-centered outcome of an AI, it is vital to focus on both the initial and continuous adaptation of new ML paradigms. Maintaining sufficient degrees of trust in generative or agentic AI systems that enable human-level performance beyond the initial burst of inflated hype requires access to more than just the outcome of a model's prediction for enabling accurate domain understanding and avoiding over- or undertrust.

6.2. Ethical Considerations

Although machines do not operate with human-like judgment, and decision processes executed by AI are not grounded in verified human principles, the use of normative ethics is a helpful tool when discussing the nature of the relations between humans and AI. In contrast to moral standards—namely by way of pre-established guidelines of what is morally wrong or good—normative ethics provides a framework within which certain decisions can be justified and be accepted as rational. The consequences of these decisions can thus also be subject to ethical evaluation.

The concrete ethical questions in normative ethics, which lie at the basis of the relevance of normative ethics for particular domains within the development of systems of AI, such as agentic AI and generative AI, concentrate on the following aspects:

1. Do the AI systems build respect? Are there any implications in terms of disrespect, exploitation, paternalism, or domination over users and stakeholders of AI systems?
2. Are the incentives of these systems aligned with the users, affected people, and society? Is there any manipulation or deception lurking in the use of these systems?
3. Do the AI systems allow for human flourishing? Are there implications in terms of suffering, harm, or well-being generated in the use of these systems? Are there considerations of identity, screen time, and addiction present in the design and use of these systems?
4. Do the AI systems allow the users or people affected by their use to achieve their unique purpose and ideas in life? Are there implications in terms of objectification or denial of agency when using these systems? Do they enable or constrain the life choices, option, meaning, and collaborative capacities of the users?

7. Risk Management Strategies

Fintechs leverage AI through actionable practices across the life-cycle of real-world decision-making, manifesting the embodied nature of machine learning processes. Each phase engenders its own idiosyncratic opportunities for deploying systems amiss. All too often these opportunities reflect the diagnostic augments invested in latent learning and generalized, modularized cognition. Stakeholders fail to easily detect that digital bias still afflicts algorithms trained on large and inclusive labeled datasets of historical transaction data — training datasets rife with unexplained outlier performance. Tests measuring system performance on varied behavioral metrics may inadequately discern whether the AI will reliably achieve a goal

of equity for all trust stakeholders. Likewise, stakeholders still may not foresee the score drift associated with stable distributions which threaten to upend the credit market, nor the risk of observation bias in the approval tradeoff between business case, user-experience, and AI evolutionary re-learning.

There can be no reliable risk model for AI, nor systemic safeguards constructed therefrom, unless the user of credit risk AI is aware of the analytic projects undertaken and transaction specifics. Have users broken free of corporate bureaucracies? Are coded rules concise enough to be organically understood by users, yet appropriately tailored through programmed heuristics? Have unstable distributions in the training data and target variable been diagnosed? Has a fairness threshold been established in a Test-and-Learn framework? These questions recognize that it is only through the interplay of these diverse stakeholders that the deployment of AI, as specifically tuned and utilized at the fingers of the expert user, can be risk-managed. Users deploy credit risk AI specifically for its bias-enhancing leverage for tracking down anomalies. Accordingly, the only set of people sophisticated enough to know who likely would benefit from ubiquitous unfettered access are the jugglers. Hence the inverse nature of the association between trust and equity with switching costs must be symptomatically redressed through embedding systemic safeguards against digital bias.

7.1. Identifying Risks in AI Deployment

Evaluating potential negative externalities that utilization of AI techniques may generate throughout its life-cycle is a task undertaken within the general framework of risk assessment. AI-generated risk assessment tasks are preferably helped and intensified by the presence of AI systems counterfactually, because they are able to better notice anomalies in the world that they have been obliquely exposed to – for instance, by operating within particular environments at text-generation times or by being pre-trained on colossal datasets constituting samples of the external world in which risk identification will have meaning and sense. Due to the representative character of data embedded in LLMs and other generative AI tools, in combination with their rich imaginative capabilities, they are well positioned to help come up with potential negative consequences in the life in society of introducing consequences pertaining to particular domains. In other words, third parties not involved in the classification of a particular concrete AI application may – through the help of AI counterfactuals and stimulations – be enabled to point out problems that could be overlooked by those contributing to and thus having a “blind spot” with respect to that scheme. The analysis may result in suggestions around the identification by the developer or operator of early warning signs related to the potential concrete effects that the tech deployment could generate during different phases of the life-time of the AI system relative to the particular environment in which it is operated.

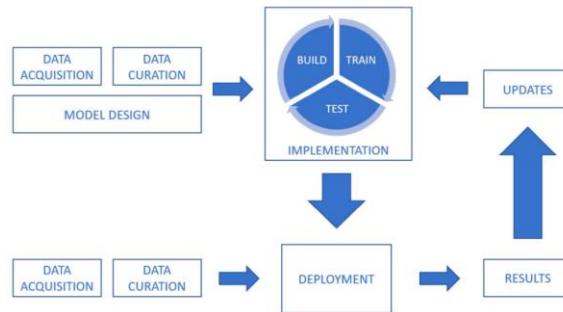


Fig 5 : Identifying AI security threats

7.2. Mitigation Techniques

In addition to the strategies for AI risk identification outlined above, several strategies exist to mitigate the potential for adverse outcomes from AI systems. These mostly focus on the data sets used to train AI systems, the AI systems themselves, the human aspects, and operational controls. Effectively addressing how generative and agentic AI systems impact these four domains helps address the various risks listed in the previous section. For data set-related risks, which comes primarily from biased data sets or those including sensitive data, mitigation strategies include:

- Redacting or filtering sensitive information.
- Ensuring diversity of the training data to the degree it is possible to ensure appropriate coverage.
- Using data augmentation techniques to synthetically add diversity to training data.

For people-related bias risks, such as not detecting frauds that disproportionately impact certain protected classes or disinformation persuasive to certain classes, it helps to use domain-focused human annotators for the training of supervised models, particularly at initial pilot stages. Enhanced validation with human feedback can also help.

Model evaluation is critical for mitigating model and operational risks. For testing and evaluating AI models, the following strategies are useful to ensure high-quality, unbiased performance of the resulting AI system during both training and production stages.

- Testing AI systems should include segment-based analysis across different demographic, geographic, behavioral, or spend attributes that are pertinent to sensitive decision-making; particularly for classification models where a minority or smaller cohort is being classified and where there can be segment-specific risk associated with individuals in a segment that may not be adequately classified with a significant probability.

8. Future Trends in AI Governance

AI governance is at an inflection point. While the existing regulatory foundations for AI governance in many jurisdictions—including data protection and privacy laws, intellectual property protections, and trade secret protections—may be sufficient to impose guardrails on certain types or uses of AI, especially more traditional forms of machine learning and data analysis; these existing guardrails may either not be sufficient to address emerging risks or they may be absent altogether. This is especially true of emerging technologies employing generative and agentic AI—including large

language models and subsequent updates to these models, and artificial general intelligence—now being heavily invested in and developed by a handful of tech giants.

Due to so-called ‘AI Winter’—more than two decades of underwhelming capabilities, investment, and breakthroughs related to various forms of AI—the existing guardrails, especially sector-specific regulations and guidelines, are absent. While companies have moved quickly to make their large language models available to the public for general use, the implementation of the above-mentioned guardrails, for the most part, have not been sufficiently fleshed out: a lasting challenge, and irony, for the legal innovation and creativity demanded by existing legal regulations, rules, and technology that have remained relatively untouched or unchanged for long stretches of time. Therefore, governments will likely turn to imposing increasingly prescriptive regulations, requiring that companies provide documentation of risk assessments and risk mitigation plans, in addition to levels of transparency—which, in some cases, may require source code disclosure and the sharing training dataset—before the rollout of new models.

8.1. Emerging Technologies

What does the future hold for AI governance and security in fintech, considering the rapid pace of technological innovation? Predicting the future is a hazardous business. At the time of writing, we are witnessing the emergence of two main technologies: foundation models, also known as Generative AI, and their counterparts for autonomous systems, also called Artificial General Intelligence.

About a decade ago, the dawn of Big Data was accompanied by an explosive growth in the size, scale, and performance of Neuromodelling technologies called Transformers. However, this technology, while capable of doing some remarkable things well, had notable weaknesses. Therefore, the risks of using these technologies in security-critical environments were considered excessive, and they were largely adopted for what the market deemed low-risk tasks, such as chatbots. The BizOps model was born, where IT, Cyber and Risk departments were gradually discouraged from playing their natural guardianship roles, reducing AI and GenAI safety accountability, which continued residing with business units because they assigned budgets and identified use cases. Recent developments show how GenAI is starting to conquer a bigger share of the market when faced with more complex, riskier tasks.

Optimists argue that bad actors are already being denied access to tools that empower them, such as Teaming technologies. Problematic use cases are being tackled and, slowly, these infrastructures are getting more secure. In fact, some of the creators of GenAI are not only investing massively on self-supervised safety, but announcing the plan to soon enable millions of security-aware Micro Enterprises to offer a wider pool of prompt expertise. Our position in this debate is a moderate one. Risk is not something that can be removed altogether; it can only be reduced or mitigated, which is something that we can never tire ourselves of working towards and supporting when it comes to new technologies that may displace entire industries.

8.2. Regulatory Evolution

The explosion of generative AI, brought about in part by recent advances in natural language processing, tips the balance further towards the need for systemic oversight and regulation. Granting Gen AI, and agentic AIs in particular, the autonomy to act in the real world requires a profound reassessment of policy responses. This will require policymakers to rethink the relationship between people, institutions, and technology; and the appropriate balance of accountability, transparency, security, liability, and safety in our technology ecosystem. Policymakers globally are starting to respond to these emerging risks with proposed regulation. But policy progress has been uneven and slow, often influenced by the jurisdiction’s cultural and historical views on technology, technologists, and governance. These factors feed into the formation of regulatory philosophies which shape governments’ regulatory approach to different sectors of the economy. For example, unlike the EU, which has a strong tradition of technoregulatory approaches built on safety and protection, the US is built on adventure with a market-driven, laissez-faire approach. So even came the cry about banishing the Drones until they can be made safe, it is unlikely from a US regulatory perspective.

Equation 3 : Security Breach Detection Probability (Bayesian Model)

$$P(B | D) = \frac{P(D | B) \cdot P(B)}{P(D)}$$

Where

$P(B | D)$: Posterior Probability of Breach Given Data D

$P(D | B)$: Likelihood of Observed Data Given a Breach

$P(B)$: Prior Probability of a Security Breach

$P(D)$: Marginal Probability of Observing Data D

9. Conclusion

This chapter has developed a governance framework for Fintech adoption of AI, focusing on generative AI and deliberating agentic AI systems and services. The framework was adopted, focusing on the Financial Market Infrastructure layer design as a role model of a reliable foundation for services and operations, while the risks and needs from Establishment and Use were detailed. The technological foundations that have scaffolded such a design were detailed, including financial transaction blockchain standards, decentralized digital identity architectures, distributed data coordination frameworks and smart contract building blocks. Furthermore, six of the ten natural systemic risks associated with generative and agentic AI have been detailed including information security risks related to the security user data; service security; identity theft and impersonation; fraud; accountability and reliability; and lethargy and loss of incentives. The novel technology that has their underpinnings were described, including decentralized data coordination, fast querying and retrieval, permissionless content generation, reinforcement learning and safety standards; the

criticisms on their ethical values; the possible mitigation proposals whenever possible; and the implications on the Shape, Scope and Value of the services.

Such a techno-socioeconomic governance framework is a scaffolding for the coming Fintech maturation. As the AI Sword of Damocles is swinging, Fintech must adopt and pioneer an enterprise-wide governance as assurance for the broader world. Throughout murals of the Financial Services architecture, we have described how reliable and ethical generative and agentic sociointeracting AI Systems enable decentralization, instantaneity, autonomization, and ubiquity of new and novel Financial Services aiming among others, Financial Inclusion, reducing the cost of Risk Management and promoting safe and secure Financial Market Infrastructures enabled by New Transport, New Transaction, New Communication and Responsible Financial Service Models.

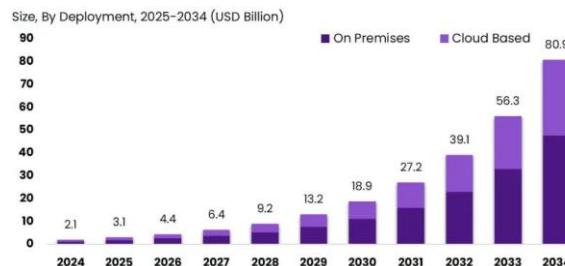


Fig 6 : Agentic AI For Financial Services Market Size

9.1. Summary and Implications for the Future of AI in Fintech

The final chapter details the main points covered and describes our particular contribution: a multiweave governance model designed to help in the task of building trust in generators and agentic systems, especially in high-stakes domains. The chapter proceeds to then discuss lessons learned, the relationship between freedom, prosperity, and responsibility in AI development, possible reasons for the currently limited success of agentic systems, and strategies for the future. Trust is crucial for the prosperity of both AI and financial technologies. AI technologies are becoming essential in fintech. The advent of generative AI in the shape of Large Language Models, Combined Generative AI, and in the metastable form of agentic AI Agents, including Autonomy-Enhanced AI Systems, help improve many elements of fintech. Such improvements include business intelligence, fintech customer-business relationships, financial corporate structural engineering, and subdividing financial markets in niche pools. Nevertheless, high-stakes deployment of these technologies in the financial sector calls for safeguards to ensure proper use.

The implications of mishaps related to the premature deployment of AI technologies are particularly severe in the case of fintech, affecting populations in rich and poor countries alike. They put on the spotlight the importance of trustworthy AI in high-stakes sectors and of relevant, up-to-date policies to ensure that development is responsible and calibrated, as to not jeopardize the freedom, prosperity, and development of the larger population while encouraging innovators to develop cutting-edge technologies and economic wealth. We first summarize the contents of this essay, and then we proceed to comment on the relationship between freedom, innovation, and responsibility in AI development, possible reasons for the success gap in the case of technology assisting Autonomy-Enhanced AI Systems, and explore some strategies for the path ahead to ensure responsible progress.

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