



# Penningtvättsdagarna 2026

Att styra AI rätt i anti-penningtvättsens tjänst

15–16 April | Stockholm Waterfront

---

Jonas Karlsson  
Managing Director FCP, Advisense

Daniel Bardun  
Senior Manager FCP, Advisense

# Today's Session

From understanding to action — building the foundation for AI in AML.

**01**

## Setting the Scene

- Introductions
- How do you treat your AI?
- The AI spectrum in AML
- Where we are today

**02**

## Looking Forward

- AMLR & AMLA
- What this means for you
- More data, better controls
- Enhanced risk management

**03**

## Taking Action

- Two paths forward
- Three horizons
- What we have done
- What to do next

### Intended outcome



A clear view of where AI fits in AML work today, what the regulatory shift changes, and how to move from ideas into a practical capability plan.

# Setting the Scene

# How do you treat your AI?

A quick diagnostic of your AI maturity



Ask ChatGPT: (or another AI Tool you use)

**Generate an image of how I'm treating you**

# How do you treat your AI?

A quick diagnostic of your AI maturity

“The overworked intern”



No strategy, no structure

“Do what I mean, not what I say”



Expectations without foundation

“Exploring and growing together”



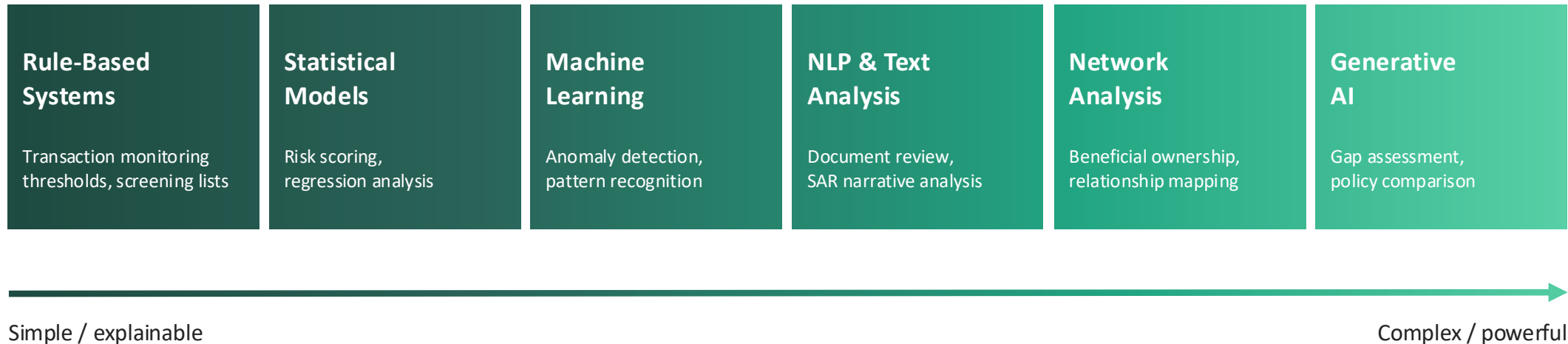
Collaboration & iteration


These images are a mirror.

How you treat your AI reveals exactly how mature and capable your organisation is with AI. In AML, that maturity gap isn't just inefficient, it can be a compliance risk.

# Where we are today - no magic bullet

“AI” in AML is not one thing. It is a spectrum of tools with different strengths and trade-offs.



 **The AI hammer problem - When all you have is a hammer, everything looks like a nail**

The real question is never “how do we use AI?” - *it is “what do we need to achieve, and which tool is right for each part of that problem?”*





# Looking Forward

# AMLR & AMLA — what's coming

The regulatory bar is rising - and so are expectations on data, controls, and risk management.

01

## AMLR regulation

- Single EU rulebook for AML
- Directly applicable from July 2027
- Harmonised CDD requirements
- Stricter beneficial ownership rules
- Enhanced transaction monitoring

02

## AMLA authority

- New EU-level supervisor
- Direct oversight of high-risk entities
- Coordinated cross-border supervision
- More consistent enforcement
- Shared intelligence and data
- High pace of change expected

03

## What this means

- More data to collect and analyse
- Better controls expected
- Higher-quality risk management
- Broader and more joined-up oversight
- Technology is no longer optional



### Bottom line

The direction is clear: more data, better controls, and higher expectations. The strategic question is how to get there without scaling only through headcount.

# Two paths forward

The pressure is real. The strategic choice is how you respond.

01

## The challenge

The Pressure Is Real

- Growing regulatory demands
- More data and more complexity
- Resource-intensive manual processes
- Scaling with headcount alone is not sustainable

Output: *something has to change*



02

## Path A: More of the same

*The Familiar Route*

- Hire more people for each new demand
- Add manual controls and workarounds
- React to each new requirement
- Increasingly expensive, with diminishing returns

Output: *not a feasible route forward*



03

## Path B: Embrace AI step by step

*The Smarter Route*

- Build capabilities gradually
- Ensure explainability and transparency
- Know when to put humans in the loop
- Iterate, learn, and improve continuously

Output: *sustainable, scalable transformation*



### Core message

The path forward is not about replacing people — it is about giving them better tools and a more scalable operating model.



# Taking Action

# Plan in three horizons

Start small, prove value, and earn the right to scale.

0–6 months



## Quick wins

Use what you have, better.

- Tune existing rules and thresholds
- GenAI for document analysis and gap assessment
- Basic automation of manual tasks
- Data-quality assessment and clean-up

*Low investment, high signal.*

6–18 months



## Structural changes

Invest and build.

- ML models for transaction monitoring
- Enhanced screening with NLP
- Better data pipelines and integration
- Cross-functional project teams

*This is where real change happens.*

18+ months

## Transformation

The vision you earn.

- AI-powered continuous monitoring
- Network analysis for beneficial ownership
- Predictive risk scoring
- Real-time regulatory change management

*You only earn this by succeeding earlier.*

# How to do it right?

Or where to go wrong.

## Choice of use-cases

- Start small but with high rewards.
- Target resource heavy but repeatable processes.
- Underlying data and processes must be solid.



## Model risk mgmt.

- AI models must be explainable and create reproduceable results. Not a black box.
- Model risk is typically high when used in core processes.
- Validate and challenge.



## Regulatory pitfalls

- AMRL, GDPR and AI-act have implications.
- Humans in the loop, profiling etc.
- Know your limits.



If you can't explain what your AI solution is doing, why and for what purpose, you are not doing it right.

# What we have done

Advisense helps organisations connect regulation, technology and business around practical AML change.

## Assessments & gap analysis

- AMLR readiness assessments
- AML / CTF gap analysis
- AI maturity evaluations
- Process and control reviews



## Strategy & prioritization

- AI strategy and use-case prioritisation
- Three-horizons planning
- Business-case development
- Cross-functional alignment



## Implementation support

- Vendor evaluation and selection
- Proof-of-concept support
- Change management and training
- Benefits measurement



### Real change happens here

The winning moves happen where FCP, technology, and business solve the same problem together.

# What to do Monday morning

Five actions to get started next week

**1**

**Book a workshop**

Get it in the calendar before it drowns in other priorities.

**2**

**Invite the three tribes**

FCP, technology, and business all need to be in the room.

**3**

**Map your top five AML pain points**

Where are you losing time, money, and sleep? Where is the risk highest?

**4**

**Ask where technology can make a real difference**

Not “what AI should we buy?” but “which problems are technology-shaped?”

**5**

**Commit to exploring and growing together**

That is how capability becomes sustainable, explainable change.

## A useful reflection prompt

When you get home tonight, ask your AI to draw a picture of how you have been treating it. If you do not like what you see, you now know where to start.

## What success looks like

A first cross-functional session booked, a shared problem list, and a realistic next step that is small enough to prove value quickly.





# Penningtvättsdagarna 2026

Att styra AI rätt i anti-penningtvättsens tjänst

15–16 April | Stockholm Waterfront

---

Jonas Karlsson  
Managing Director FCP, Advisense

Daniel Bardun  
Senior Manager FCP, Advisense