

The future of risk in banking

Transforming risk management for a dynamic new era

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Introduction

To address increasing uncertainty, banking risk leaders must adapt the entire risk management cycle. This involves transforming risk identification, measurement, monitoring, controlling, and reporting, alongside enhancing data and infrastructure. The Chief Risk Officer (CRO) plays a pivotal role in this transformation.

This survey-led paper explores factors driving the evolving risk environment, such as digitalization, competition, emerging risks and regulatory changes. It emphasizes the interconnected nature of these drivers and the need for CROs to lead risk-management transformation. Banks must respond swiftly to risks, potentially adjusting risk positions or business models.

Given the speed at which risks unfold, banks should be able to respond quickly and decisively, which may involve reducing or shifting risk positions, or adjusting business and operational models in the short term. A strong risk-awareness culture is vital in order to engage all parts of the bank in identifying and managing risks with the necessary speed.

When executed effectively and efficiently, risk management can be a competitive advantage. With a clear vision, CROs can help banks navigate volatility and influence risk management across the organization. Reading this paper is essential for gaining insights that offer a competitive edge, enabling CROs to stay ahead by understanding and implementing the strategies discussed.



In a world marked by constant disruption, the CRO is no longer just a guardian of compliance but a strategic navigator — guiding banks through uncertainty to embrace opportunity.

Arvind Sarin

Partner, KPMG in Germany

Methodology

This paper draws insights from extensive data analysis, case studies and interviews with 20 KPMG professionals globally specializing in risk management in banking.

KPMG conducted four global surveys, collecting opinions and perspectives from over

100 banks across 33 jurisdictions world wide



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Emerging risks

Several interconnected factors are driving the transformation of banks' risk functions — a world fragmenting into trading blocs, global conflicts and other geopolitical headwinds, as well as new and emerging technologies which introduce new risks and opportunities. According to KPMG research, banking leaders say two leading challenges affecting their organizations are economic volatility and geopolitical complexity.¹

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Geopolitical fragmentation and economic volatility are no longer outliers they are the new normal, demanding a far more agile and connected risk function.

Justin Malta
Partner, KPMG in the UK

¹ Banking CEO outlook, KPMG International, 2024.

According to banking risk leaders, the top internal emerging risk factors are organizational complexity, and the need for increased business resilience and efficiency.² These threats all influence the rise of non-financial risk³ amid the increasing complexity of today's financial systems.

CROs also say their number one focus in the next one to three years is to better understand and proactively adapt to emerging risks⁴ such as severely disrupted supply chains, geopolitical impacts, ESG demands and cyber risk. Forward-looking banks are recognizing that today's fast-emerging risks require a greater, organization-wide focus on risk identification and assessment to ensure operational resilience.

Managing digital operations and digitalization

Digitalization is transforming the way banks serve customers and define controls in today's consumer-centric digital economy. While the potential benefits of new technologies cannot be overstated, the need to manage the evolving risk environment is also on the rise. Failure to embrace digital change could leave banks trailing more innovative competitors. However, banks also need to manage the additional risks associated with digital service, such as different approaches to commit fraud, consumer protection and system interruptions. Banks need to keep pace with digital innovation to stay competitive, while at the same time effectively managing the heightened risks that come with digital transformation and the use of new technologies.

Meeting evolving regulations

Banks continue to face significant regulatory pressure, covering both financial and non-financial risks, including conduct and compliance, most notably from ESG regulations, which may be fairly mature in some regions, evolving in others, and even declining — such as in the U.S. or partially elsewhere. Navigating the regulatory environment is becoming increasingly difficult due to the lack of consistency in requirements in particular across countries and regions.

According to KPMG research, the number one factor driving faster risk-management transformation is the need





Non-financial risks are not directly related to financial market movements or credit and liquidity exposures. Instead, they stem from operational, legal, compliance, reputational and other external or internal factors. These risks can still have significant financial consequences, even though they do not originate from traditional financial sources.

to adapt to the ever-changing regulatory landscape.⁵ And ensuring regulatory compliance is cited as the top response to managing today's risk challenges.⁶ Achieving compliance demands appropriate new resources, budgets and skills. Digitalization, especially AI, offers banks the potential to efficiently manage and control associated costs.⁷ On a positive note, banks' extensive experience of regulatory affairs places them in a strong competitive position vis-à-vis fintechs and other new market entrants.



Digital transformation without a corresponding evolution in risk management is like building a high-speed train without checking the tracks — it's fast but potentially disastrous.

Rob Smith

Partner, KPMG in the UK

^{4, 5, 6} Future of risk in banking, KPMG International, 2025.

⁷ KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.



To address the drivers of change impacting risk management, banks need to transform their risk-management operations, talent management, workplace cultures and cost management — while consistently maintaining compliance.

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The transformation of the risk function is led by the CRO, with success depending on all stakeholders collectively embracing its evolving role.

Paul Lech
Partner,
KPMG in Canada



Modernizing operations

Banking operations are being affected by several factors today. Many still rely on outdated systems and legacy infrastructure. Many processes remain manual and error-prone. Third-party dependencies are pervasive, where interconnectedness can increase reliance on external entities; and employee capabilities must keep pace with evolving operational demands.

At the same time, organizations need to manage: soaring volumes of data and methods to transform and read data; accessibility of data for decision makers through effective reporting; and the capabilities of people who interpret the data.

Risk capabilities should be expanded to address the interconnectedness and velocity of risks, for example by integrating emerging risks alongside more traditional ones. Risk-management frameworks in today's reality must ultimately place greater emphasis on resilience and outcomes.

Managing cost pressures

Operations and risk-management approaches need to become more cost-efficient as banks increasingly embrace the vast power of new technologies. Unfortunately, by rushing into technology investments — especially automation, centers of excellence and offshoring of services — banks often fail to address the root causes of their struggle with cost pressures. The result? Duplication of effort, project reworks and delays, a lack of accountability and marginal returns. In today's environment, a strategic, comprehensive view is indispensable — establishing process improvements and operational efficiencies that keep pace with market changes, evolving strategies and regulatory expectations, while maintaining effective operations and risk management.



Transforming operations means creating risk functions that are as dynamic and data-driven as the risks they are built to manage.

Cameron Burke
Partner,
KPMG in the US

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More than

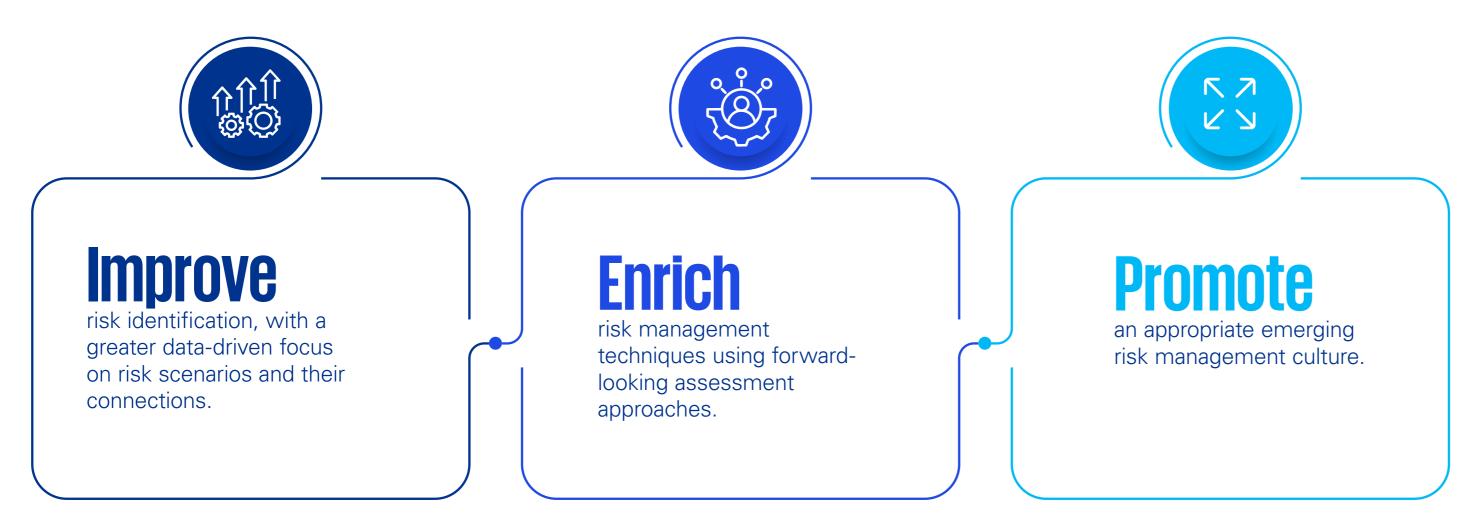
50 percent

of banks reported increasing risk-function costs in the past two years. Going forward, the majority of risk leaders do not expect further cost increases.⁸

⁸ KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

Addressing emerging risk

To deal with the growing interconnectedness and speed of emerging risks, we believe today's challenged banking leaders should focus on three major risk-management techniques:



Such an approach fosters stakeholder trust — a bank's most valuable asset — and builds credibility by showing how the organization can quickly adapt to and mitigate new threats.

Managing emerging risks demands a risk-centric organizational culture that embraces change and emerging new opportunities.

All employees across the organization should adopt a risk-awareness mindset that includes the confidence to challenge prevailing views in a changing reality. Additionally, having the right skills in the right place at the right time can be indispensable to success on the dynamic risk-management front.



The future of risk demands a culture where curiosity is rewarded, silos are broken and every employee is empowered to act on risk.

Matthias Mayer

Portner

Partner, KPMG in Germany



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A roadmap into the future of risk management



In the following sections, KPMG professionals share timely insights into how banking risk leaders and their functions can meet today's diverse and unprecedented challenges by focusing on these key elements of the risk-management cycle:



Risk identification



Risk measurement



Risk monitoring, control and reporting



Data and infrastructure



Risk identification: Understanding today's new reality

The growing importance of emerging risks reflects a changing risk universe and, critically, shows that risks are interdependent as never before. Simply put, they cannot be treated in isolation. Leaders should view risk from a bank-wide perspective to truly understand how emerging risk scenarios impact their clients, competitors, products and internal operations.

Banks need mechanisms to swiftly identify disruptive events quickly, including those that are difficult to assess and quantify. A modern approach to risk management emphasizes risk identification that focuses closely on causes and interdependencies. In the context of emerging risks, financial institutions must adapt their identification processes to proactively detect potentially adverse developments early, using both internal expertise and external data sources. This includes frequent, structured risk assessments and early relevance evaluations of scenarios to determine whether deeper analysis and countermeasures are needed.



Risk measurement: sizing up threats — and opportunities

Once identified, risks should be assessed to evaluate their potential impact on the organization. This involves qualitative and quantitative valuation methods and includes the need to consider organization-wide interdependencies, including business units, treasury, IT, and beyond.

It's clear today that risk measurement is playing catchup with a dynamic, interconnected risk environment.

Traditionally, banks quantified risk impacts on capital
and liquidity through statistical and financial models that
often struggle with reflecting complex interdependencies,
exceptional events or fundamental regime changes.

Emerging-risk analysis requires a shift to proactively embrace
forward-looking, scenario-based assessments that evaluate
second-order effects on business and operating models.

Moreover, the speed of data analysis remains a bottleneck
due to manual processes and intervention. This impairs
deeper analyses that are crucial in addressing emerging risks.

Developing a comprehensive risk-management framework to address increasing complexity and the evolving nature of risks — the priority of regulatory compliance — is now a leading CRO priority.

95 percent

of risk leaders say the integration of systems, domains and processes can enhance the effectiveness of risk-related decision-making.⁹

In addition, non-financial risk management is becoming more data-driven, demanding significant new capabilities to source, interpret and manage data.

'Cross-risk stress testing' is particularly valuable for quantifying adverse scenarios. Advancing these methods into integrated planning and simulation tools adds substantial value. But it requires rapid access to scenario analyses and the ability to reflect qualitative insights within stress test results — either within models, or through models or expert judgments, when relevant scenario-specific interdependencies or impacts are difficult or impossible to model. Speed is crucial — yet most banks struggle to provide scenarios for timely decision-making.



Risk measurement must evolve from a rear-view mirror approach to a forward-looking radar, capable of sensing disruptions before they arrive.

Brian Hart
Partner,
KPMG in the US

⁹ KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

Al's emerging value — and looming risks

Artificial intelligence continues to provide businesses with unprecedented capabilities. Although Al adoption to date has been limited, risk processes are increasingly being automated to manage complexity and risk via classical Al and generative Al. Al-enabled data analysis in particular can help risk teams better understand proliferating data, unidentified risk factors, and dependencies, in addition to providing new risk-forecasting capabilities and automation of internal and client-facing processes. Table 1 provides examples of Al's exciting applications.

While AI promises numerous advantages, beware — it also introduces several risks and obligations. Al models can provide incorrect insights, leading to poor investment decisions or loan approvals for high-risk individuals or organizations. Additionally, biased AI programs can discriminate against certain groups, for example by declining credit to specific customers, conducting biased performance reviews for employees, or rejecting job applicants due to biased AI training data. KPMG research reveals that technological disruption — of which the current Gen Al boom is a prime example — is a top factor driving risk-management transformation.¹⁰ Risk management needs to evolve to address the significant challenges of AI and other new technologies. Leaders need to better understand, identify and assess risks across the organization and integrate them into risk measurement. The CRO plays a crucial role in establishing the guardrails needed today to effectively manage Al-related risks. By collaborating with the first line of defence, the CRO helps unlock Al's potential safely, ensuring that the organization leverages unprecedented Al technologies and capabilities while maintaining compliance and mitigating risk.



Gen Al has huge potential to speed up processes and offer accurate insights, but banks need to proceed with caution, instill guard rails and ensure trusted use that also meets regulatory requirements.

Matthias Peter

Partner, KPMG in Germany



Table 1: Innovative AI use cases in risk management

Gen Al	Description and examples
Customer-facing chat bots	Enhanced employee productivity and customer service through Al-driven chatbots.
Document cross-referencing and gap analysis	Comprehensive analysis and cross-referencing of regulatory and internal documents.
Extraction of key data	Gen Al-driven extraction of essential data from financial statements to support credit analysts.
Personalized financial advisory	Tailored financial advice based on individual customer profiles and preferences.
Processes and code documentation	Automated documentation of processes or code.
Machine learning	Description and examples
Machine learning Automated data quality assessment	Description and examples Improvement in detecting errors in external data deliveries.
Automated data quality	Improvement in detecting errors in external data
Automated data quality assessment	Improvement in detecting errors in external data deliveries. Identifying and preventing fraudulent activities
Automated data quality assessment Fraud detection	Improvement in detecting errors in external data deliveries. Identifying and preventing fraudulent activities by analyzing transaction patterns. Enhancing the accuracy of credit decisions using

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¹⁰ Future of risk in banking, KPMG International, 2025.



Risk monitoring and control — integrating risk management

Robust risk identification and measurement provides a foundation for effective risk monitoring and control. KPMG's research found that risk monitoring and control is a leading benefit of digital acceleration. Building a future-focused management approach is therefore central for CROs and the broader risk organization.

Modern risk management demands collaboration across the first and second lines of defense. The business, as the first line, should take greater responsibility for risk management — including non-financial risk challenges such as client onboarding. Integrated risk management combines the views of the first and second lines of defense, based on a common data architecture, shared processes and standards. Research reveals that a top benefit of such collaboration is a consistent approach to enterprise-wide risk management. Better alignment with business objectives strengthens overall risk-management effectiveness, which in turn brings greater agility and cost efficiency. A strong enterprise-wide risk-management function, with direct reporting to the CRO, can foster greater collaboration within banks.

In today's increasingly complex and digitized risk landscape, supervisory expectations regarding the robustness and transparency of the control environment continue to rise. Regulators and stakeholders alike demand greater assurance that organizations maintain effective, responsive,

well-documented internal controls. This shift is amplified by accelerating digitization that both challenges traditional control frameworks and opens new opportunities for enhanced oversight.

At the same time, leading organizations are leveraging Al-driven solutions to strengthen assurance functions — enabling more-efficient control testing, facilitating thematic reviews across business units, and unlocking deeper insights through advanced reporting capabilities. These developments not only support a more-agile control environment, they also foster proactive risk management aligned with regulatory expectations.

Reporting and analysis as regulatory scrutiny grows

In reporting on and analyzing risk, banks face increasing demands from regulators and supervisors — declining in the US and partially elsewhere, for example. There has been significant progress in improving the efficiency of reporting, by implementing leaner processes, as well as improved data quality, availability and consistency across the CRO function. Risk reporting encompasses a huge range of extensive reports that provide management with relevant information. Many provide information but and little in the way of insights enabling linkage between risks, controls, issues and events.

Effective reporting is not just about presenting data. It should also tell a coherent story, which requires risk professionals to change their mindset from describing to interpreting and acting on data-driven insights. By harnessing self-service and

simulation capabilities, risk managers can produce highlydetailed and informative reports. They can also use ad hoc simulation to better understand risk sensitivity across diverse scenarios, as well as assessing the impact of potential actions on the organization's broader KPIs.

Finally, standardization provides a foundation for a reporting framework and landscape that is supported by risk management and IT. This promises accurate and reliable insights regarding risk-scenario calculation and response. Given the volume of reports accessible to senior management, reporting processes should be harmonized, ideally by building a reporting hub responsible for aggregating data from across the organization, and investing in cleaning data.

Around 75 percent

of respondents say a lack of appropriate risk data collection and management hinders their risk management effectiveness.¹³

^{11, 12} Future of risk in banking, KPMG International, 2025.

¹³ KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.



Risk data and infrastructure: the critical need to enhance data quality

As technology transforms data management and infrastructure, banks need clean and reliable data from well-integrated systems across the risk-management cycle. Data is central to regulatory requirements — such as BCBS 239 covering effective risk data aggregation and risk reporting¹⁴ — and is subject to increasing regulatory scrutiny.

KPMG's research reveals that data and infrastructure remains a top challenge for risk functions today. Many banks have a fragmented legacy infrastructure, insufficient transparency on data, and no common approach to data management. Consequently, data aggregation is carried out in different systems that are not standardized. Risk leaders say data fragmentation and poor data quality hinder decision-making and collaboration.¹⁵

Existing frameworks and infrastructure may also be unable to process certain types of new data. This could prevent banks from collecting ESG data ecosystem-wide in order to efficiently embed key information into modern data-aggregation and data-management frameworks. KPMG's ESG survey uncovers the top challenge for the next two years is insufficient or inaccurate data.¹⁶

management projects organization-wide to create a holistic system that accesses data from risk, finance and other parts of the organization and lays the foundations for enhanced reporting and analytics. Integrated data, held within a single data warehouse and managed by sound data-management practices, is more likely to be accurate and reliable.

In response, some banks are undertaking large data-

To manage growing data volumes, banks also need to choose appropriate storage and software providers. Larger organizations may elect for proprietary software and private, possibly on-premise cloud, while smaller-to-mid-size banks are likely to choose public cloud providers. Banks should evaluate their options thoroughly to help ensure that they meet today's — and tomorrow's — data protection and privacy requirements.

Harnessing digital acceleration and data analytics

The rising use of Gen AI and ML analysis, along with automation, can improve data quality and data transparency and give CROs unprecedented new insights that are timely, meaningful and actionable. According to the CRO survey, the number one technology to support risk management in the next three to five years is AI and ML.¹⁷

However, risk management teams are still in the relatively early stages of testing AI and ML use cases for banking. Additionally, current regulations in many regions mean that AI can only be integrated into bank risk management in a very specific way. If these constraints can be overcome, the potential for data analytics is huge.



Without reliable, high-quality data, even the most-sophisticated risk models are built on sand.

Ulrike Heyken

Partner, KPMG in Germany

Banks need to adopt a holistic approach to data, taking it out of individual functions and creating consistent, organization-wide management to lay the foundations for advanced reporting and analytics.

Michael Monteforte

Partner, KPMG China

¹⁴ Guide on effective risk data aggregation and risk reporting, European Central Bank, May

Future of risk in banking, KPMG International, 2025.
 ESG Risk Survey for Banks, KPMG International, 2023.

¹⁷ KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.



Risk management is clearly evolving as bank CROs adapt to technological innovation, emerging risks and regulatory requirements. More than ever, risk leaders should enhance the risk management cycle to help protect banks from uncertainty and support the creation of value at the same time.

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The tasks in risk management are expected to evolve and proactive anticipation of these changes can serve as the catalyst for growth.

Narinder Singh

Partner, KPMG in the UK



Deliver value, save costs, increase efficiency

Investing in an efficient risk function can boost productivity and profitability, delivering business value while satisfying compliance obligations. Efficiency can be increased through new technologies that simplify processes and improve risk assessment.

Risk functions can be reorganized, for example by applying AI and automation to handle repetitive tasks and reallocating staff to areas such as emerging risks and cybersecurity. Banking executives believe that outsourcing or co-sourcing enhances risk-management efficiency, with 85 percent saying cost management is critical to their strategic priorities.¹⁸

Invest in skills and build a risk-aware culture

As risk functions evolve, the skillsets required of risk professionals are shifting. Risk professionals are expected to serve as value-adding business partners — identifying and mitigating risk, resolving challenges and driving strategic initiatives. This requires a senior, cross-functional risk skillset, deep business acumen, and well-developed soft skills to manage stakeholders and exert influence across the organization.

Expertise in AI, data and broad risk management is increasingly needed. CROs should target hiring and upskilling to gain expertise in new risk areas.

Transforming the risk function require a strong risk-aware culture. Leadership plays a crucial role in fostering this culture, ensuring risk management is prioritized across the organization. A robust 'risk-centric' culture helps employees recognize risks within their functions and understand risk interconnectivity. Management should view risk management as a value-adding growth-enabler. Cross-functional collaboration and communication are key to understanding large-scale events and building resilience. Teamwork across risk domains enhances comprehensive risk assessment and strengthens the organization's overall risk posture.

Manage regulatory demands in a world of change

Achieving regulatory compliance is crucial. The risk function must adapt to regulatory changes, considering the varying strictness across different regions, e.g. between US, UK and europe. The process of compliance can become more efficient by continuously reviewing regulatory priorities and harmonizing regulatory initiatives.



KPMG research reveals that about

30 percent

of banks have completed, or are planning, changes to their organizational setup, particularly in emerging sub-functions such as NFR, ESG and compliance.²⁰

¹⁸ KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

¹⁹ Future of risk in banking, KPMG International, 2025.

²⁰ KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

Conclusion

As banking CROs grapple with significant challenges in today's unprecedented reality, effective change management promises to transform the risk function and enhance business value. KPMG's research highlights two key factors for successful risk transformation: an integrated enterprise risk-management platform and streamlined processes.

A truly modern risk-management strategy encompasses data, Al integration and other technologies — and associated risks — enterprise-wide. It features flexible risk management incorporating emerging risks while consistently integrating risk management into all business processes. By understanding key drivers of risk and transformation requirements, CROs can align strategies with organizational goals and transform performance across the risk-management cycle.

As the rapid pace of change continues to accelerate in today's hypercompetitive environment, we believe that banking leaders have no time to lose in pursuing the journey to risk management for a new era.

Meet the author



Arvind SarinGlobal Leader, Risk Function Transformation, KPMG International

Arvind Sarin is a Partner at KPMG in Germany and the Global Leader for Risk Function Transformation in the global KPMG organization. He has more than 15 years experience in risk management with a focus on banking clients and transformation projects. He is a specialist on broader risk management topics including treasury, especially liquidity risk, IRRBB, structural FX risk and bank steering.



Nancy Chase
Global Risk Leader, KPMG
International and Partner,
KPMG in Canada

Nancy, as the Global Risk Leader, is a fellow Chartered Professional Accountant and Certified Internal Auditor with over 25 years of experience in risk management, governance, controls, and advisory services. In this capacity and through her other leadership roles, Nancy has oversight responsibility for the development of strategies and solutions to support clients in the domains of emerging technology, regulatory change, governance, risk and compliance, and cyber, focusing on services of most relevance to clients in the financial services, tech, and the public sectors. As a partner, Nancy has also led risk and advisory services to a few global companies, notably those in high growth and technology sectors, through which she has advised clients on navigating the complexity of evolving risks and regulations to support their growth ambition and transformation requirements.



Justin Malta
Global Leader, Regulatory
and Risk Advisory,
KPMG International and
Partner,
KPMG in the UK

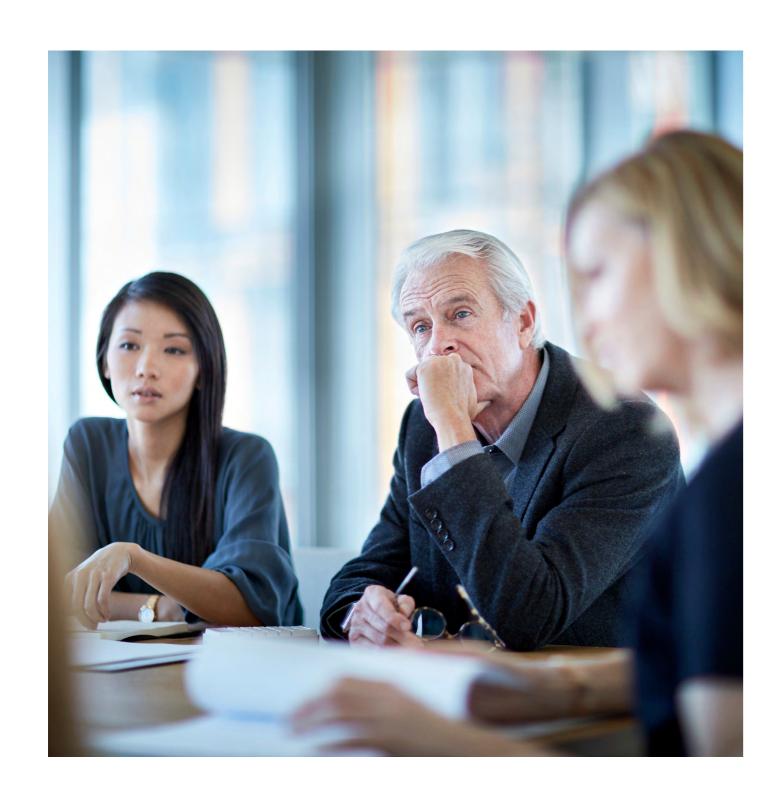
Justin is the Global Leader for the Regulatory and Risk Advisory practice, with over 20 years of experience in banking and consulting. As partner, he has worked with seven of the world's ten largest investment banks, major financial market infrastructure providers, and the captive financing arms of leading global corporations. Justin specializes in broad regulatory and risk transformations, leading complex, multi-year, international programs focused on aligning business and operating models with regulatory demands.



Matthias Mayer
Partner, EMA Head of
FS Consulting,
CMO/CSO Financial
Services,
KPMG in Germany

As CMO/CSO, Matthias is responsible for Markets and all Solutions in FS Germany, advising CROs at German banks. He is responsible for the entire FS Consulting Business in EMA as well. At KPMG in Germany, he drives market development and product innovation responsibly. He stands for intelligent Financial Services Solutions. With a holistic and, above all, personal consulting approach, he helps ensure innovation, progress, and transformation in the financial industry. In addition to individual consulting based on more than 20 years of experience in the areas of financial and risk management, he offers a decisive competitive advantage through intelligent digital solutions.

How KPMG can help



In navigating the intricate landscape of risk and compliance, organizations increasingly require robust risk management frameworks. KPMG banking risk professionals stand ready to assist, drawing upon extensive experience and technical capabilities to help you overcome multifaceted challenges. Whether grappling with regulatory complexities or evolving technology threats, KPMG specialists offer a suite of services to help fortify risk management practices and cultivate trust.

KPMG banking risk professionals merge their experience in risk with transformative insights to offer strategies that can not only shield against uncertainties but also illuminate new pathways to resilience, growth and enhanced stakeholder trust. Leveraging powerful risk analytics, advanced modeling techniques, and real-time risk reporting, KPMG professionals empower banks to integrate risk management into their daily operations. Through innovative services, KPMG professionals enable clients to proactively address emerging risks and seize opportunities for value creation.

KPMG's member firm services-driven approach is tailored to meet evolving business needs, with the aim of ensuring that risk management remains adaptable and responsive. By collaboratively building robust risk programs, KPMG professionals can help banks cultivate trust with stakeholders while navigating the dynamic business landscape with confidence.



Whether grappling with regulatory complexities or evolving technology threats, KPMG specialists offer a suite of services to help fortify risk management practices and cultivate trust.

Contacts

Nancy Chase

Global Risk Leader
KPMG International and Partner
KPMG in Canada
E: nchase@kpmg.ca

Justin Malta

Risk and Regulatory Leader KPMG International and Partner KPMG in the UK E: justin.malta@kpmg.co.uk

Cameron Burke

Principal, Risk Strategy and Compliance KPMG in the US

E: cburke@kpmg.com

Linda El-Ghordaf

Partner, Financial Risk Management KPMG in Canada

E: lelghordaf@kpmg.ca

Samantha Gloede

Global Trusted Leader KPMG International **E:** sgloede@kpmg.com

Brian Hart

Principal, Financial Services Risk,
Regulatory and Compliance
Network Leader
KPMG in the US
E: bhart@kpmg.com

Ulrike Heyken

Partner, Financial Services
KPMG in Germany
E: uheyken@kpmg.com

Paul Lech

National Service Line Leader, Financial Risk Management KPMG in Canada E: plech@kpmg.ca

Diane Lowe

Partner, Financial Risk Management KPMG in Canada

E: kdlowe@kpmg.ca

Matthias Mayer

Partner, EMA Head of FS Consulting CMO/CSO Financial Services KPMG in Germany

E: matthiasmayer@kpmg.com

Michael Monteforte

Partner, Financial Risk Management KPMG China

E: michael.monteforte@kpmg.com

Matthias Peter

Partner, Financial Services KPMG in Germany **E:** matthiaspeter@kpmg.com

Dr. Arvind Sarin

Global Leader, Risk Function Transformation KPMG International KPMG in Germany

E: arvindsarin@kpmg.com

Narinder Singh

Partner, Banking risk
KPMG in the UK
E: narinder.singh@kpmg.co.uk

Rob Smith

Partner and UK Head, Regulatory & Risk Advisory KPMG in the UK E: robert.smith@kpmg.co.uk

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Designed by Evalueserve.

Publication name: The future of risk in banking | Publication number: 139905-G | Publication date: September 2025