



# The future of risk in banking

Transforming risk management for a dynamic new era

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# Contents

**03** Introduction

---

**05** What's driving change in risk management?

---

**07** Transforming the risk function for a bold new reality

---

**10** A roadmap into the future of risk management

---

**15** Strive to minimize uncertainty and drive value across the risk management life cycle

---

**17** Conclusion

---



# 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. In this article, we share insights that offer a competitive edge, enabling CROs to stay ahead by understanding and implementing the strategies discussed.

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In the next cycle, risk management won't just protect the bank—it will determine whether AI ever scales beyond pilots. The future CRO is as responsible for enabling productivity and resilience as they are for building trust in the institution.

**Anand Desai**

Principal, Advisory, Line of Business,  
Financial Services  
KPMG LLP

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# 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**  
**worldwide.**



# What's driving change in risk management?



## 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.<sup>1</sup>

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Today's risk landscape is a complex storm system. To navigate this reality, risk functions need to be agile and interconnected with a panoramic view of emerging risks.

### Cameron Burke

Principal, Advisory, Line of Business,  
Financial Services  
KPMG LLP

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<sup>1</sup> 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.<sup>2</sup> These threats all influence the rise of nonfinancial risk<sup>3</sup> 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 risks<sup>4</sup> such as severely disrupted supply chains; geopolitical impacts; environmental, social, and governance (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.



**The KPMG CRO survey found that banks expect fewer analysts across the risk function and the addition of new skills—substantially reducing the ratio of managing and nonmanaging personnel.**

<sup>2</sup> Future of risk in banking, KPMG International, 2025.

<sup>3</sup> Nonfinancial 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.

<sup>4,5,6</sup> Future of risk in banking, KPMG International, 2025.

<sup>7</sup> KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

## 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 nonfinancial 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 US 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 to adapt to the ever-changing regulatory landscape.<sup>5</sup> And ensuring regulatory compliance is cited as the top response to managing today's risk challenges.<sup>6</sup> Achieving compliance demands appropriate new resources, budgets, and skills. Digitalization, especially artificial intelligence (AI), offers banks the potential to efficiently manage and control associated costs.<sup>7</sup> 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.



**In the race to stay ahead of risk, modernizing risk operations isn't an expense to be minimized, but a critical investment in the horsepower needed to navigate the twists and turns of a high-speed, high-stakes environment.**

**Tim Phelps**

**US Risk Services Leader, KPMG LLP**





# Transforming the risk function for a bold new reality

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

**Cameron Burke**

Principal, Advisory, Line of Business,  
Financial Services  
KPMG LLP

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## 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.

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.<sup>8</sup>**

<sup>8</sup> KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

## Managing cost pressures

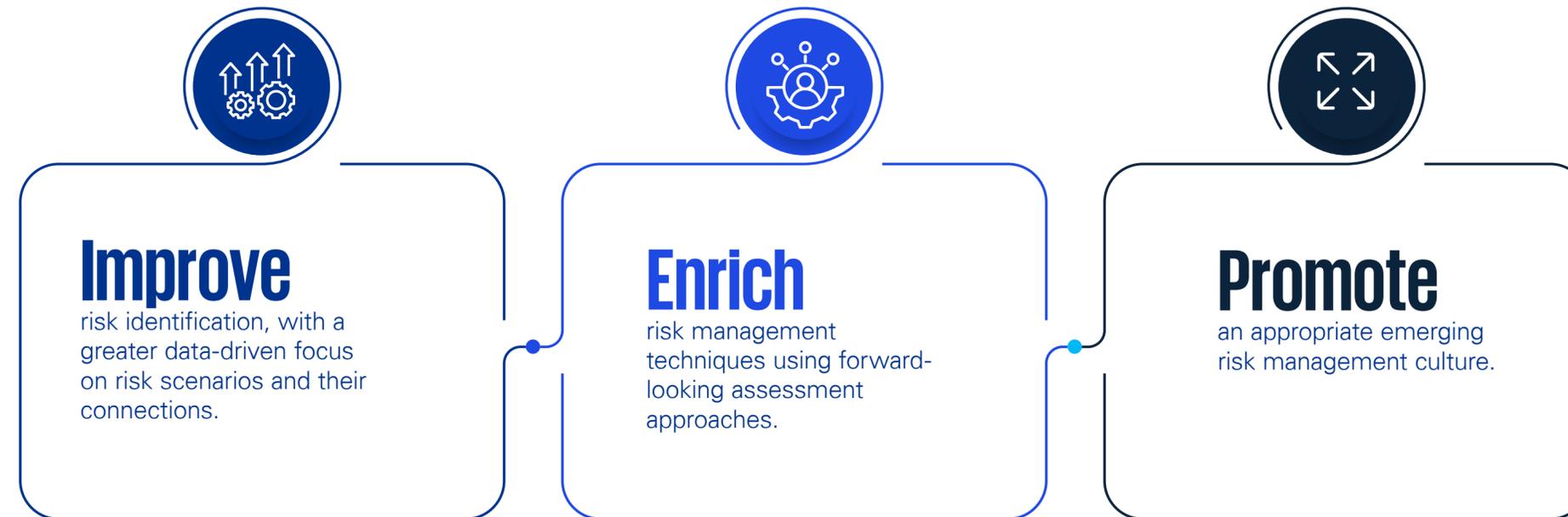
Operations and risk management approaches need to become more cost-efficient as banks increasingly embrace the vast power of new technologies.<sup>8</sup> Unfortunately, by rushing into technology investments—especially automation, centers of excellence, and offshoring of services—banks often fail to 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.





## Addressing emerging risk

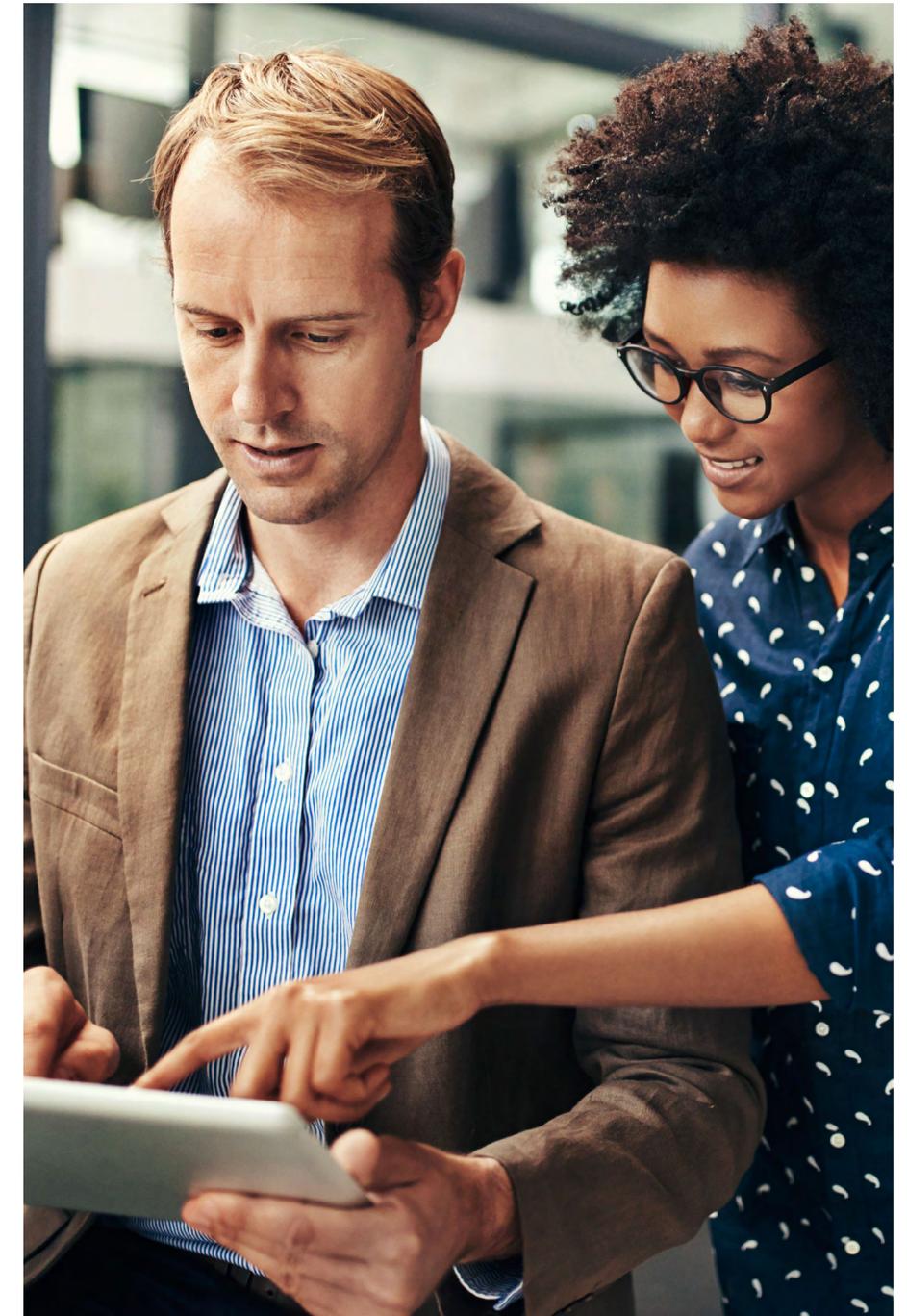
To deal with the growing interconnectedness and speed of emerging risks, we believe today's challenged banking leaders should focus on three major risk management techniques:



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.





# 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, information technology (IT), and beyond.

<sup>9</sup> KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

It's clear today that risk measurement is playing catch-up 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.<sup>9</sup>**

In addition, nonfinancial 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**

Financial Services Risk, Regulatory and Compliance Offering Leader  
KPMG LLP





## AI's emerging value—and looming risks

AI continues to provide businesses with unprecedented capabilities. Although AI adoption to date has been limited, risk processes are increasingly being automated to manage complexity and risk via classical AI and generative AI (GenAI). AI-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 AI's exciting applications.

While AI promises numerous advantages, beware—it also introduces several risks and obligations. AI 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 GenAI boom is a prime example—is a top factor driving risk management transformation.<sup>10</sup> 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.

<sup>10</sup> Future of risk in banking, KPMG International, 2025.

The CRO plays a crucial role in establishing the guardrails needed today to effectively manage AI-related risks. By collaborating with the first line of defense, the CRO helps unlock AI's potential safely, ensuring that the organization leverages unprecedented AI technologies and capabilities while maintaining compliance and mitigating risk.



**GenAI offers risk management new superpowers—real-time risk sensing, predictive compliance, and AI-driven scenario planning. It also introduces new risks that demand a new kind of oversight.**

**Samantha Gloede**  
Global Risk Services Leader and  
Global Trusted AI Leader,  
KPMG LLP



**Table 1: Innovative AI use cases in risk management**

Gen AI	Description and examples
Customer-facing chat bots	Enhanced employee productivity and customer service through AI-driven chatbots
Document cross-referencing and gap analysis	Comprehensive analysis and cross-referencing of regulatory and internal documents
Extraction of key data	GenAI-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
Automated data quality assessment	Improvement in detecting errors in external data deliveries
Fraud detection	Identifying and preventing fraudulent activities by analyzing transaction patterns
Credit decision	Enhancing the accuracy of credit decisions using predictive analytics
Intra-day risk management	Forecasting intra-day cash flow timestamps for liquidity risk management
Modeling of customer behavior	Clustering and forecasting bank deposits to optimize liquidity management



## Risk monitoring and control— integrating risk management

Robust risk identification and measurement provides a foundation for effective risk monitoring and control. Our KPMG research found that risk monitoring and control is a leading benefit of digital acceleration.<sup>11</sup> 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 nonfinancial 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.<sup>12</sup> 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 AI-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, but 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 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 highly detailed 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.<sup>13</sup>**

<sup>11, 12</sup> Future of risk in banking, KPMG International, 2025.

<sup>13</sup> 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 reporting<sup>14</sup>—and is subject to increasing regulatory scrutiny.

KPMG 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.<sup>15</sup>

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. The KPMG ESG survey uncovers the top challenge for the next two years is insufficient or inaccurate data.<sup>16</sup>

<sup>14</sup> Guide on effective risk data aggregation and risk reporting, European Central Bank, May, 2024.

<sup>15</sup> Future of risk in banking, KPMG International, 2025.

<sup>16</sup> ESG Risk Survey for Banks, KPMG International, 2023.

<sup>17</sup> KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

In response, some banks are undertaking large data-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.

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 GenAI and machine learning (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.<sup>17</sup>

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, then the potential for data analytics is huge.



**Data is the central nervous system of banks. A unified, high-quality data infrastructure is no longer a 'nice-to-have'; it's the core of a bank's ability to sense and respond to risk in real-time.**

**Anand Desai**

**Principal, Advisory, Line of Business,  
Financial Services  
KPMG LLP**





# Strive to minimize uncertainty and drive value across the risk management life cycle



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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Risk organizations can automate the predictable so their people can master the unpredictable. The future of risk management lies in tech-enabled intelligence and deep human expertise.

**Tim Phelps**

US Risk Services Leader, KPMG LLP

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## 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 cosourcing enhances risk management efficiency, with 85 percent saying cost management is critical to their strategic priorities.<sup>18</sup>

## Invest in skills and build a risk-aware culture

As risk functions evolve, the skill sets 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 skill set, 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.<sup>19</sup> 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 subfunctions such  
as nonfinancial risk (NFR), ESG,  
and compliance.<sup>20</sup>**

<sup>18</sup> KPMG Global Risk & Compliance Benchmarking Survey, KPMG International, 2024.

<sup>19</sup> Future of risk in banking, KPMG International, 2025.

<sup>20</sup> 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 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, AI 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.





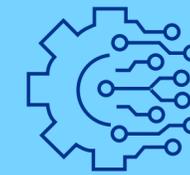
# How KPMG can help



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.

Our service-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



**Cameron Burke**  
Principal, Advisory, Financial Services  
Risk, Regulatory and Compliance  
KPMG LLP



**Anand Desai**  
Principal, Advisory, Line of  
Business, Financial Services  
KPMG LLP



**Samantha Gloede**  
Global Risk Services Leader and  
Global Trusted AI Leader  
KPMG LLP



**Brian Hart**  
Principal, Advisory, Financial  
Services Risk, Regulatory and  
Compliance Offering Leader  
KPMG LLP



**Timothy Phelps**  
US Risk Services Leader  
KPMG LLP

## Meet the author



**Arvind Sarin**  
Global Leader,  
Risk Function Transformation,  
KPMG International

Arvind is a partner at KPMG in Germany and the Global Leader for Risk Function Transformation in the KPMG global organization of independent firms. He has more than 15 years of 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, Interest Rate Risk in the Banking Book (IBBRR), structural FX risk, and bank steering.



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