Banks

The Engines of Financial Intermediation

Banks are drawing the line on AI agents. How much control do they publicly disclose across the full AI stack?

Areas with disclosed control, by layer, across ten major banks: models 31 of 50 · agents 6 of 50 · compute 2 of 50 · data centers 1 of 50 · power 0 of 50.

10 banks · 25 areas of AI control each

The 5×5 AI Control Matrix™: an independent standard for AI control in institutional finance.

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Why banks

Banks are not merely intermediaries between savers and borrowers. They facilitate payments, create credit, manage liquidity and support the functioning of the broader economy.

As AI becomes embedded across these activities, control ceases to be a technology issue and becomes a matter of safety, soundness and systemic resilience.

So we asked a simple question: what can ten major banks actually show, in public, about controlling their AI?

BANKS · THE TYPICAL BANK

What the typical bank shows

25 areas of AI control: five layers of the AI stack (rows) by five kinds of control (columns). The median of ten banks, area by area.

	JURISDICTIONAL	LOGICAL	TECHNICAL	OPERATIONAL	CONTRACTUAL
Power	ND	ND	ND	ND	ND
Compute	ND	ND	ND range ND – Evolving	ND	ND
Data Centers	ND	ND	ND range ND – Evolving	ND	ND
Models	ND	**EVOLVING** range Evolving – Governed	**EVOLVING** range ND – Governed	**EVOLVING** range Evolving – Governed	ND range ND – Evolving
Agents	ND	ND	ND	**EVOLVING** range ND – Evolving	ND

SOVEREIGN · GOVERNED · EVOLVING · REACTIVE · NOT DISCLOSED

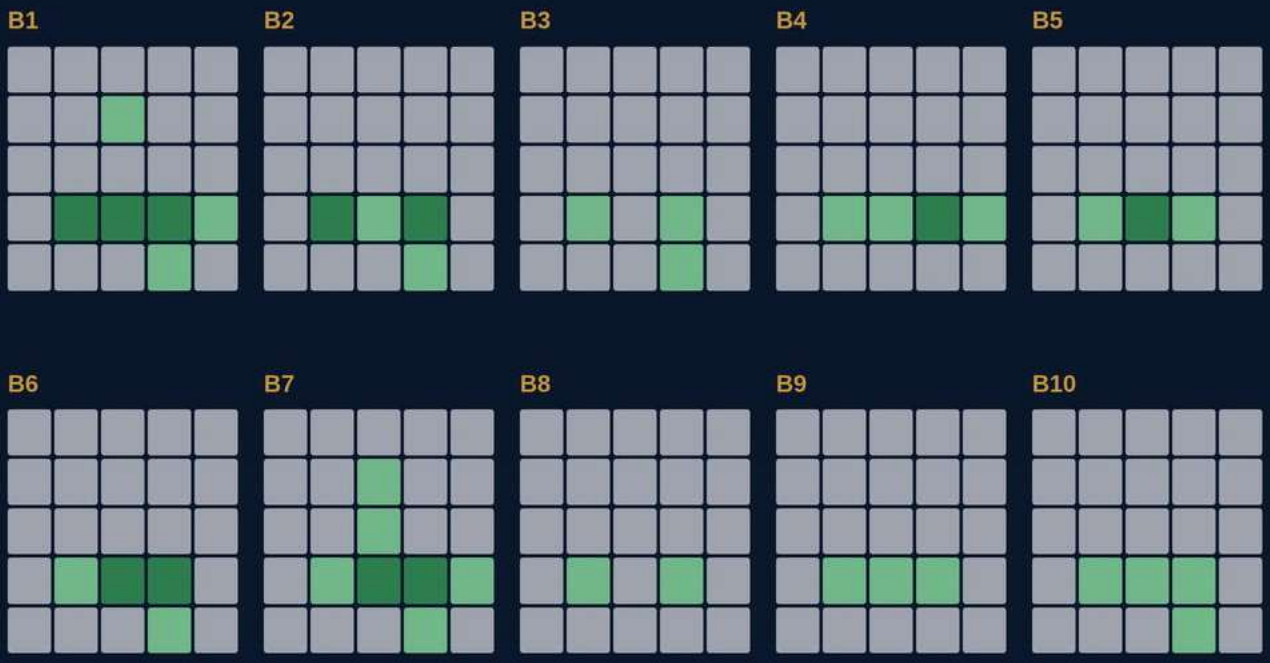
Governed: the public record describes a specific, named control mechanism. Evolving: partial measures or stated intent. Not Disclosed: nothing public, which is not evidence that control is absent.

Public information as of June 30, 2026. Tiers reflect our analytical opinion on the completeness of public disclosure, not an assessment of any institution's internal controls. Not Disclosed reflects the absence of public disclosure, never evidence that control is absent. Institutions are unnamed and presented without regard to size, market position or ranking.

BANKS · ALL TEN BANKS

Ten banks. One standard.

Each grid is one bank's 25 areas of AI control, in report order. Grey means nothing public; green means disclosed control; dark green means a specific, named control mechanism is disclosed.



Rows, top to bottom: Power · Compute · Data Centers · Models · Agents

Columns, left to right: Jurisdictional · Logical · Technical · Operational · Contractual

SOVEREIGN	GOVERNED	EVOLVING	REACTIVE	NOT DISCLOSED

By layer: models 31 of 50 areas with disclosed control · agents 6 · compute 2 · data centers 1 · power 0. Across all 250 areas: 40 show some control, 11 a specific mechanism (Governed), none Sovereign.

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What the record shows

01 Most disclosure sits at the model layer.

Banks disclose more than any other sector we studied, and most of it concerns models: 31 of 50 model areas. In 11 of 250 areas the record names a specific control mechanism (Governed). None reaches Sovereign.

02 Agents: partial, and only on oversight.

6 of 50 agent areas show disclosed control, all partial and all about operational oversight. None covers who agents can access, how they are protected, under whose law they run, or contractual rights over them.

03 Beneath the models: 3 of 150.

Across compute, data centers and power, 3 of 150 areas show any disclosure. On power, none. Control of an AI environment runs from the power up, not from the model down.

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A QUESTION FOR EVERY BANK BOARD AND RISK COMMITTEE

If a supervisor asked your bank to show control of its AI end to end, from power to agents, what would you hand them?

Not describe. Evidence.

AI governance establishes intent. AI control demonstrates evidence: through every layer of the AI stack, and across every party that operates AI on the bank's behalf.

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AI is a given. Control is not.™

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