

Scope & Methodology

A disclosure-grounded study of AI control across eighty institutions in eight sectors

This report presents a structured, evidence-first study of AI control across eighty leading financial institutions in eight sectors of the global market. It does not measure broad AI adoption, and it does not assess the maturity of governance policy. It examines something more specific and more consequential: how far each institution can, on the strength of its own public disclosure, demonstrate control over the artificial intelligence it already runs — across the ownership, infrastructure, jurisdiction, operation, and resilience of that AI. The eight sectors reviewed — asset owners, asset managers, asset servicers, banks, wealth managers, retirement providers, private equity firms, and insurers — together form the systemic core of the institutions that steward, manage, safeguard, advise, insure, and deploy capital across the global financial system.

Universe. Within each sector, ten institutions were selected by asset scale, structural significance, and market prominence, for a reviewed universe of eighty. Each institution was read against the same framework, on public disclosure alone, producing one of the most comprehensive disclosure-grounded pictures of institutional AI control compiled to date.

Framework. The study is anchored by the **5×5 Control Matrix™**, which reads five AI ecosystems — power, compute, data centers, models, and agents — against five dimensions of operational and legal control:

- **Jurisdictional** — where AI workloads and data actually reside, and under which laws they operate.
- **Logical** — who can access what, under which conditions, with demonstrable proof.
- **Technical** — cryptographic and architectural control over data, models, and isolation.
- **Operational** — real-time visibility, monitoring, and human oversight of what the AI is doing.
- **Contractual** — enforceable rights to audit, exit, and hold providers accountable.

Method. Each institution was reviewed against public registries, formal filings, and verified company disclosure; every colored cell traces to a cited public source, and cells default to no-disclosure unless a specific source supports a higher posture. The sector composites presented throughout reflect the median verified posture within each segment, with the range noted where firms diverge. They are designed to surface structural patterns and to show where control architectures concentrate and where they thin — not to serve as an audit, rating, or benchmark of any individual institution.

A note on what the tiers mean. The tiers reflect the completeness of public disclosure as our review found it. An institution that discloses little may control its AI well; absence of disclosure is not evidence of weak control, and no cell should be read as a verdict on any single firm.

This report does not evaluate, rate, certify, or benchmark any individual institution; the tiers reflect the completeness of public disclosure as our review found it, not an assessment of any institution's actual controls.