WHITE PAPER

SymphonyAI

A Convergent Standard for Sanctions Compliance

The FCA's Sanctions Assessment, OFAC's Enforcement Record, & the AI Imperative for Sanctions Compliance

Elizabeth Callan - August 2026

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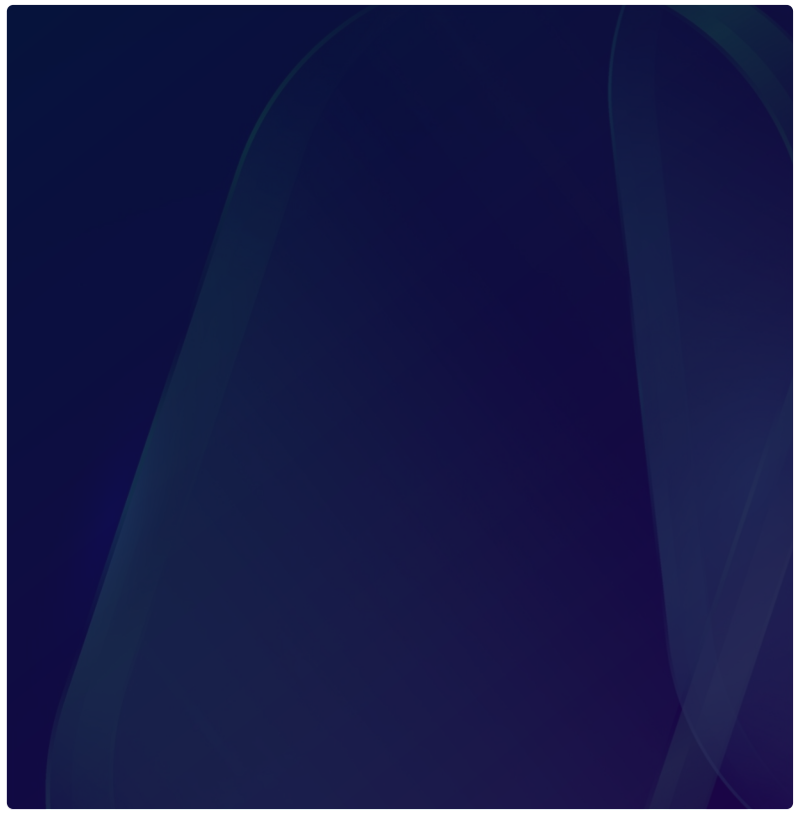
The FCA's May 2026 assessment of sanctions systems and controls across more than 150 UK-supervised firms is a landmark piece of regulatory intelligence. It is also, for anyone who has read OFAC's enforcement record closely, deeply familiar. The failure modes are the same. The governance gaps are the same. The screening deficiencies are the same. The good news is that the solutions are also the same – and AI-enabled platforms are now mature enough to address them at scale.

Executive Summary

On 28 May 2026, the Financial Conduct Authority (FCA) published its most comprehensive review of sanctions systems and controls to date, drawing on proactive assessments of more than 150 FCA-supervised firms conducted since February 2022. The review covers governance, risk assessment, screening, alert management, evasion detection, asset freezing, and breach reporting–effectively mapping the entire sanctions compliance lifecycle. The FCA found a sector that is improving but uneven: strong where firms have invested in structured frameworks, materially deficient where they have not.

The findings are striking not only for what they reveal about UK financial services but for how precisely they echo themes that the U.S. Office of Foreign Assets Control (OFAC) has been articulating–through enforcement actions, guidance, and its 2019 Framework for OFAC Compliance Commitments–for the better part of a decade. Reading the two bodies of regulatory output together reveals a convergent global standard for what effective sanctions compliance looks like, regardless of jurisdiction.

This paper analyses the FCA's findings in depth, draws explicit parallels to OFAC's assessment and enforcement posture, identifies the compliance implications financial institutions must act on now, and explains where AI-driven technology–and specifically SymphonyAI's Symphony Risk Intelligence (SRI) platform–provides measurable capability to meet these requirements.



Key FCA Findings at a Glance

2026 FCA Finding	OFAC Parallel
Governance frameworks inconsistent; over-reliance on group/third-party arrangements	Third-party and affiliate over-reliance is a recurring root cause in OFAC enforcement actions
Risk assessments incomplete, siloed from AML, or not granular enough for trade sanctions	OFAC Framework identifies holistic, documented risk assessment as an essential program component
Screening miscalibrated; fuzzy matching failures; name ingestion errors	Screening software limitations explicitly listed as a common OFAC compliance breakdown
Alert backlogs; SLA breaches; poor escalation between first and second line	Alert management failures appear in enforcement cases across Binance, bank settlements, and MSB actions
Evasion typologies not embedded in controls; trade sanctions capability immature	OFAC tri-seal notes and enforcement cases consistently cite failure to understand evasion typologies
Asset freezing procedurally weak; license compliance poorly governed	Asset-freezing failures generate strict liability exposure under both US and UK regimes
Breach reporting improving but average time from identification to report is 116 days	OFAC considers timeliness of self-disclosure a significant mitigating factor in penalty calculations

Details of the FCA’s 2026 Assessment

Context and Scope

The UK's sanctions landscape has undergone a structural shift since February 2022. The post-invasion expansion of Russia-related regimes–covering both targeted financial sanctions and increasingly complex sectoral and trade measures–has been layered onto an already demanding compliance environment. UK-frozen assets reached £37 billion in 2024-2025, up from £24.4 billion the prior year. The number of designated persons subject to targeted financial sanctions has grown substantially, and the prohibited activities now extend well beyond asset freezes to encompass investment bans, infrastructure access restrictions, financial services prohibitions, and a broadened set of trade-linked service restrictions.

Frozen assets in the UK

2023–24	2024–25	In one year
£24.4bn	£37bn	+52%

The FCA's assessment covered more than 150 firms spanning payments, retail banking, wholesale financial markets, insurance, and digital assets. Its findings draw on proactive supervisory work, firm-reported breach data from REP-CRIM returns, and a bespoke sanctions screening testing (SST) workstream in which the FCA directly evaluated firms' screening performance. The breadth of the review makes it one of the most granular regulatory assessments of sanctions compliance ever published in the UK.

Governance and Oversight: Where Strategy Meets Accountability

The FCA found a mixed standard of governance across the firms it reviewed. The clearest differentiator between stronger and weaker firms was whether senior management exercised genuine, informed oversight of sanctions risk–not merely nominal accountability. Firms with mature governance maintained:

- current and accurate sanctions policies that encompassed the full spectrum of restrictions;
- produced MLRO reports that assessed regulatory developments, firm-specific exposure, and control effectiveness;
- delivered role-specific training including for higher-risk functions;
- used internal and external audits to validate control frameworks

Weaker firms displayed several recurring failures:

- Sanctions policies were often outdated or focused exclusively on asset freezes, failing to address sectoral sanctions or trade-related prohibitions
- Firms relying heavily on group entities or third-party vendors for sanctions compliance frequently could not demonstrate adequate local oversight or governance over those arrangements–a structural accountability gap that the FCA treated as a significant concern in its own right.

The absence of effective contingency arrangements was also exposed: in one documented case, when a retail bank's external screening system went offline, the firm had no fallback capability and thousands of payments queued unscreened.

The governance principle the FCA is asserting is clear: delegation to a group entity or vendor transfers operational function, not regulatory accountability. Firms that cannot demonstrate oversight and assurance over arrangements they rely on will be treated as though those arrangements do not exist.

Management Information: The Intelligence Gap

The FCA observed that while most firms reported some sanctions-related MI to senior management, the quality and depth of that MI varied markedly. Stronger MI combined quantitative data–true matches, false positive rates, alert volumes and resolution times–with qualitative analysis of inherent risk, control effectiveness, and emerging typologies. Weaker MI was either too thin to support decision-making or so focused on financial sanctions metrics that it provided almost no visibility into trade or sectoral sanctions exposure.

The MI gap for overseas branches was particularly pronounced. Firms with international operations often failed to adequately reflect the sanctions risks generated by those branches in their group-level reporting. Given that a significant number of sanctions breaches involve cross-border transactions and correspondent relationships, this blind spot represents a material vulnerability.

Risk Assessments: Incomplete, Siloed, and Over-Reliant on Third Parties

The FCA's assessment of risk assessment quality revealed systemic weaknesses. The most common failures were interconnected:

- assessments that did not distinguish sanctions risk from broader financial crime risk
- insufficient granularity to support decision-making at the product and customer segment level
- jurisdictional risk ratings that relied heavily on third-party vendor scores with limited internal challenge
- a failure to integrate trade sanctions and proliferation financing as distinct risk dimensions.

The proliferation financing gap is worth particular emphasis. While AML programs have historically been the vehicle through which financial crime risk is assessed holistically, proliferation financing carries distinct characteristics–longer time horizons, state-actor involvement, dual-use goods complexity–that require dedicated treatment.

The FCA's observation that proliferation financing risk received limited or no consideration in many firms' assessments points to a gap that is likely to attract increasing supervisory attention as North Korean and Iranian sanctions programs continue to generate regulatory action.

The FCA also identified firms that demonstrated strong practice: those developing detailed product and jurisdictional risk assessments that explicitly considered how sanctions–including trade and sector-based measures–could be circumvented, and that drew on internal breach data, transaction analytics, and external typology reporting to assess inherent and residual risk dynamically. These firms used their risk assessments as living operational documents, not periodic compliance exercises.

Due Diligence and Ongoing Monitoring: The Customer Lifecycle Problem

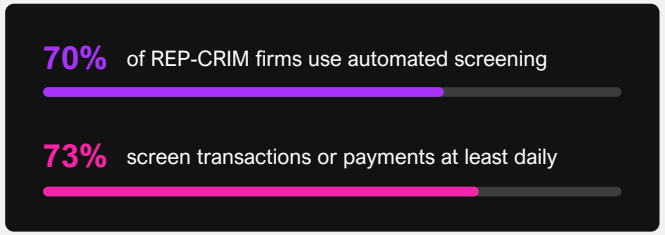
The FCA found significant inconsistency in how firms manage sanctions risk through the customer lifecycle. At onboarding, the use of sanctions exposure questionnaires (SEQs) was common, but their quality varied enormously–many were outdated, limited in scope, or treated as customer self-attestation exercises rather than genuine risk-assessment tools. Firms with stronger practice used detailed, risk-based SEQs to identify direct and indirect sanctions exposure, including exposure through counterparties, third-country risk, and industry-specific circumvention vectors, supplementing those tools with compliance team discussions when onboarding higher-risk entities.

The challenge of beneficial ownership penetration was a recurring theme. Firms struggled to identify and manage sanctions risk when ownership structures were multilayered or deliberately opaque. Some suspected breach cases involved connections that were only identifiable through emerging external intelligence, embedded deep in corporate group structures, or obscured by the use of intermediaries. The FCA observed that some firms lacked a complete understanding of beneficial ownership for entities in complex distribution chains, or failed to identify indirect exposure to designated persons through seemingly arms-length counterparties.

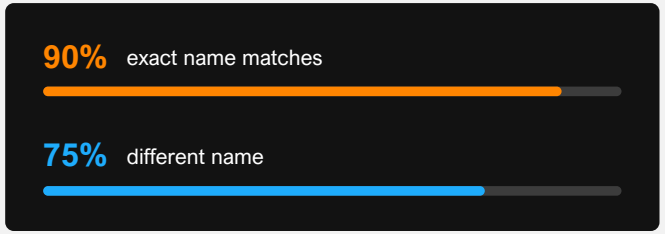
Ongoing monitoring quality was similarly uneven. Review cycles often focused disproportionately on PEPs rather than taking a comprehensive sanctions risk view. EDD documentation for high-risk cases was frequently inadequate, with poor audit trails and limited corroboration of customer-provided information. Where firms outsourced CDD or screening to third parties, oversight and validation of those arrangements was often insufficient.

Screening: Calibration, Configuration, and the Fuzzy Matching Problem

The FCA's sanctions screening testing workstream generated some of the most granular quantitative findings in the report. Automated screening is now widespread–70% of firms filing REP-CRIM returns use it, and 73% screen transactions or payments at least daily. But prevalence does not equal effectiveness.



The SST found that firms achieved 90% correct identification rates for exact name matches, improving over the testing period. For name variations–minor spelling changes, non-Latin characters, different name element ordering–the correct identification rate fell to 75%. These are system-level averages; individual firm performance varied considerably.



The FCA identified specific technical failure modes:

- titles and honorifics reducing match scores below alert thresholds
- one-word or digit-containing names excluded as system defaults
- long names exceeding character limits and failing silently
- phonetic and spelling variation matching that could not recognize legitimate variants of designated persons' names.

List management failures compounded screening weaknesses. Errors in third-party vendor data feeds, delays in updating the UK Sanctions List, and gaps in firms' internal customer records, including dates of birth entered as placeholder values, all degraded matching performance. The FCA found that firms frequently could not explain their vendors' matching logic or configuration choices, representing a fundamental oversight failure.

The FCA's finding that 95% of firms performing ongoing customer screening had identified no true sanctions matches since 2022 is not, as it might superficially appear, reassuring. Given the scale of sanctions designations since February 2022 and the documented presence of designated persons in UK financial markets, the more likely explanation is systematic screening gaps rather than a genuinely clean customer population.

Alert Management: The Last Line of Defense, Frequently Breached

Alert handling emerged as one of the most common proximate causes of suspected sanctions breaches. The FCA found timeliness a persistent challenge: only around 44% of firms resolved name screening alerts within one working day, and a quarter took three to five days. For fast-moving sanctions designations–where assets can be moved within hours of a designation event–response time measured in days represents a material risk window.

The FCA documented case studies that illustrate the cascade of failures that leads to breaches:

- alerts that flagged exposure were not prioritized
- escalation procedures were not followed under operational pressure
- handoffs between teams failed
- assets were moved before restrictions were applied.

In one particularly striking case, analysts bypassed mandatory escalation procedures to meet internal productivity targets, resulting in missed connections to a designated vessel owner and potential sanctions breaches.

The broader pattern the FCA observed–firms without meaningful MI on alert resolution timeliness, without quality assurance over alert outcomes, and without clearly defined SLAs–describes an alert management function that is structurally unable to function as the reliable last line of defense it needs to be.

Evasion Detection: The Trade Sanctions Gap

The FCA's findings on evasion detection **reveal an industry that is significantly more capable at detecting financial sanctions exposure through screening than at identifying the more complex evasion typologies that characterize sophisticated sanctions circumvention**–particularly in trade finance contexts.

Name and payment screening, the FCA notes, are often insufficient to identify activities that breach sanctions, particularly where the connection to sanctioned activity cannot be identified from transaction messaging alone. This is especially true for sectoral financial sanctions and trade sanctions, where the prohibited activity may be embedded in the commercial structure of a transaction rather than in the identity of a named party. The FCA observed that evasion typologies–documented by OFAC, OFSI, FATF, and others–were not consistently reflected in firms' risk assessments, policies, or controls design.

The FCA did identify examples of stronger evasion detection practice:

- firms conducting targeted investigations on high-risk customers, reviewing transactional activity before and after major sanctions events to detect rerouting or behavioral shifts

- firms developing and refining tailored transaction monitoring scenarios informed by their own investigative insights
- firms exploring the use of automation and AI to reduce manual processing of trade documentation and identify anomalies

These represent the direction of travel the FCA expects the industry to follow.

Asset Freezing and License Compliance: Process Failures with Legal Consequences

The FCA identified major causes of suspected sanctions breaches in two areas that might reasonably be expected to be operationally straightforward: failing to properly freeze assets and failing to comply with sanctions license conditions. Both involve strict legal obligations, and both revealed procedural weaknesses that are difficult to explain in terms other than poor governance.

Asset freezing failures included insufficient documentation of account restriction procedures, inadequate restrictions applied during investigation periods, internal transactions moving funds within a frozen account, and charges applied to frozen accounts. License compliance failures included firms lacking clear policies on what expenses qualify as 'basic needs' under a license provision, and staff who did not understand how to apply account restrictions correctly when a customer's status changed.

The FCA's expectation is unambiguous: firms must have clear, documented policies that define precisely when to restrict accounts, what types of restrictions to apply, and what escalation and approval routes are required. The absence of such policies is not a mitigating factor–it is itself an indicator of governance failure.

Breach Reporting: Improving but Still Too Slow

Breach identification and reporting is improving. The average time between potential breach identification and reporting fell from 120 days in 2024 to 116 days in 2025, and the proportion of reported breaches relating to activity that occurred in a prior year fell from 48% to 35%. These are meaningful improvements. They are also, from a regulatory accountability perspective, still deeply concerning.

An average of 116 days between identification and reporting–nearly four months–describes a reporting culture that has not yet internalized the urgency that regulators in both the UK and US now expect. Both the FCA and OFAC treat timeliness of disclosure as a significant factor: for the FCA it is an indicator of control maturity; for OFAC it is an explicit mitigating factor in civil penalty calculations. In both jurisdictions, prompt voluntary self-disclosure is the firmest foundation for a cooperation narrative in enforcement proceedings.

The OFAC Parallel: A Convergent Global Standard

OFAC's Framework for Compliance Commitments

OFAC's 2019 Framework for OFAC Compliance Commitments remains the most comprehensive articulation of US sanctions compliance expectations. Its five essential components–management commitment, risk assessment, internal controls, testing and auditing, and training–map directly onto the FCA's assessment framework, even though the two documents were developed independently and address legally distinct regulatory regimes.

OFAC's guidance is notable for what it says about the relationship between compliance program quality and enforcement outcomes. While OFAC does not mandate a formal sanctions compliance program, its enforcement record makes the practical requirement unambiguous: **the absence of an effective SCP is a root cause of violations and an aggravating factor in penalty calculations. Conversely, the existence and genuine implementation of an SCP is a mitigating factor.** This calculus is structurally identical to the FCA's approach, which treats governance and control quality as determinative both of supervisory posture and of the proportionality of any enforcement response.

Common Root Causes: The OFAC Record

OFAC explicitly identifies common compliance program breakdowns in its published guidance and has illustrated them across years of enforcement actions. They include:

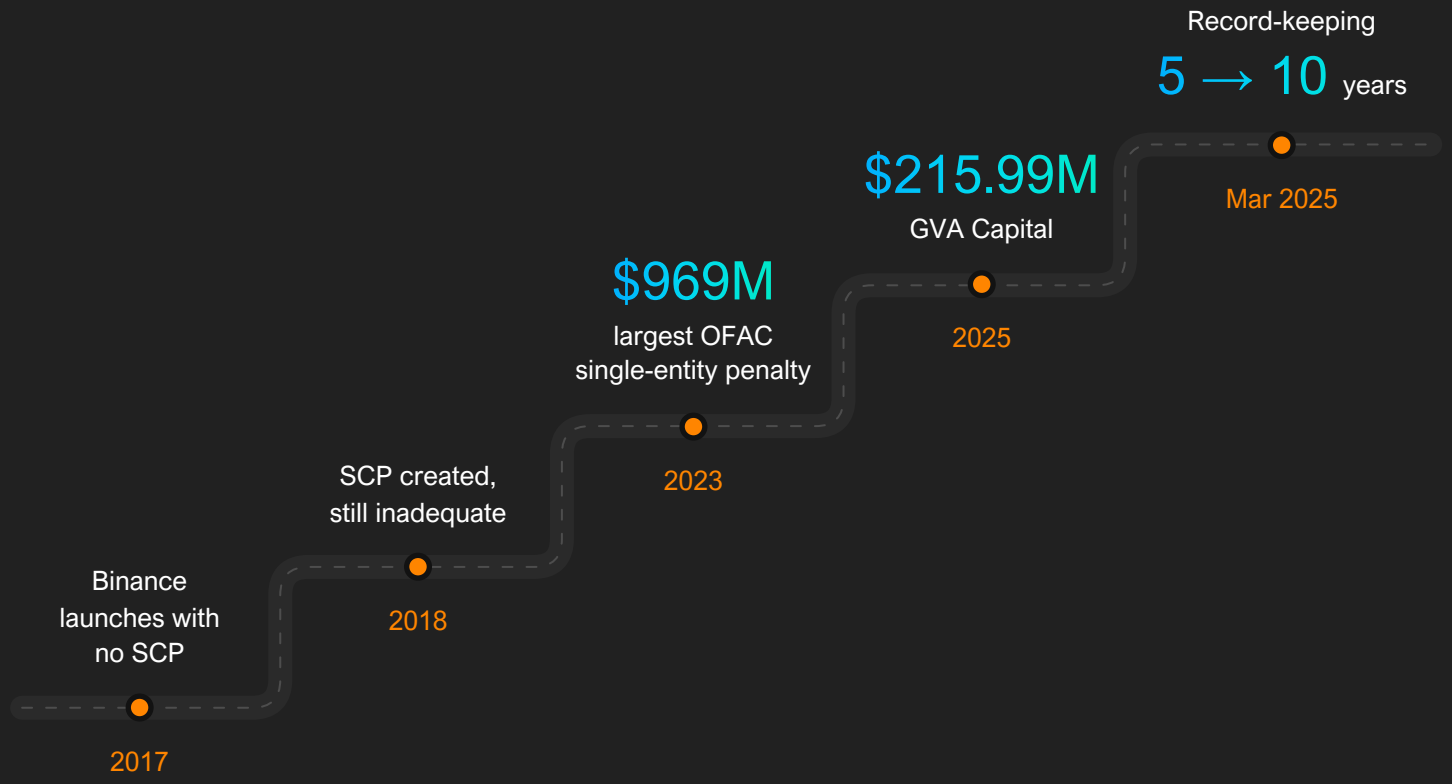
- the lack of a formal SCP
- misinterpretation or failure to understand the applicability of OFAC regulations
- facilitating transactions by non-US persons through overseas subsidiaries or affiliates
- limitations in sanctions screening software or filters
- improper due diligence on customers or clients
- decentralized compliance functions with inconsistent application
- senior-level employee misconduct

Every one of these appears in the FCA's 2026 findings.

The 2023 Binance settlement–at approximately $969 million, the largest sanctions-related penalty in OFAC's history against a single entity–illustrates what the absence of a structured SCP at scale looks like. OFAC found that Binance failed to establish any SCP at inception in 2017, and that when it created one in 2018, the program remained inadequate and ineffective. The subsequent years of accumulated violations flowed directly from that foundational failure.

The parallel to FCA-supervised firms that rely on group arrangements without demonstrating local oversight is imperfect but instructive: structural delegation without genuine governance produces the same outcome regardless of whether the firm is a global exchange or a retail bank.

OFAC's enforcement landscape in 2024 and 2025 continued to surface the same themes. The 2025 GVA Capital penalty–$215.99 million–involved management of US-person assets in violation of sanctions. OFAC's record-keeping extension from five to ten years, effective March 2025, signals an expectation of program documentation and longitudinal compliance evidence that aligns precisely with the FCA's emphasis on audit-ready governance documentation and evidenced control frameworks.



The Evasion Intelligence Gap: Both Regulators are Watching

Both the FCA and OFAC have invested significantly in communicating sanctions evasion typologies to the industry–through tri-seal compliance notes (OFAC, DOJ, Commerce), threat assessments, advisory notices, and guidance documents. The FCA's finding that those typologies are not consistently reflected in firms' risk assessments, policies, or controls is therefore not a surprise, but it is a regulatory signal.

Firms that have not embedded publicly available evasion intelligence into their control design are failing on a test that does not require sophisticated analytical capability–it requires institutional will to read and act on regulatory guidance.

The Russia-related evasion environment illustrates the stakes. OFAC's Task Force KleptoCapture (active 2022-early 2025) and the FCA's observations about shadow fleet activity, cryptocurrency routing through e-money wallets, complex corporate chains, and third-country intermediary layering describe a sophisticated, adaptive evasion ecosystem that has successfully exploited gaps in both US and UK firm controls.

The firms that detected these patterns–described in the FCA's case studies–did so through proactive, intelligence-led approaches: reviewing transaction behavior before and after designation events, building internal watchlists from investigative insights, aligning second-line TBML and sanctions teams, and using open-source data to corroborate trade documentation.

Trade Sanctions: The Shared Blind Spot

Perhaps the most consequential area of convergence between the FCA and OFAC assessments is the consistent observation that trade sanctions compliance is significantly less mature than financial sanctions compliance across most institutions. The FCA found more limited breach reporting from sectors with material trade sanctions exposure–insurance and digital assets in particular–despite documented evidence that Russia's shadow fleet and cryptocurrency channels have been used to evade sanctions. OFAC's enforcement record includes multiple cases involving apparent violations of trade-linked sanctions–export controls, restricted goods, third-country intermediary routing–where firms lacked the transactional monitoring and documentary verification capabilities to detect the underlying activity.

The complexity of trade sanctions compliance is genuine.

Firms often have only partial transactional data, goods descriptions in free-text fields may be vague or deliberately misleading, and the multi-party nature of trade finance transactions creates multiple points at which evasion can be introduced. But these difficulties have been publicly articulated by regulators, and the FCA's identification of good practice–firms using vessel tracking data, corporate structure analysis, document review repositories, and AI-assisted anomaly detection–demonstrates that solutions exist. The question for financial institutions is whether they have invested in those solutions proportionate to their trade exposure.

Implications for Financial Institutions' Sanctions Compliance Programs

The Governance Imperative

Both the FCA and OFAC leave no room for ambiguity on governance: effective sanctions compliance requires demonstrated senior management commitment, clear accountability structures, documented oversight of third-party and group arrangements, and audit trails that evidence the operation and effectiveness of controls–not merely their existence. The management information function is not a reporting exercise; it is the mechanism through which senior management can discharge their accountability.

For financial institutions, the practical implication is a governance review that asks:

- whether board-level and senior management oversight of sanctions risk is substantive rather than nominal
- whether MLRO reporting on sanctions is sufficiently detailed to support informed decision-making
- whether third-party and group arrangements are subject to documented oversight and periodic assurance
- whether contingency arrangements exist and have been tested for critical control failures including screening system outages

Risk Assessment Redesign

Risk assessments that do not explicitly distinguish financial sanctions, trade sanctions, and proliferation financing as distinct risk dimensions are not fit for the current regulatory environment. **The FCA's expectation–and OFAC's parallel expectation–is for risk assessments that are granular enough to support control design decisions, dynamic enough to update when the risk environment changes, and integrated enough to connect inherent risk, control effectiveness, and residual risk into a coherent picture.**

This requires moving away from static, periodic risk assessment exercises toward continuous risk intelligence–drawing on internal breach data, transaction analytics, external typology reporting, regulatory guidance, and jurisdictional risk intelligence to maintain a living view of sanctions exposure. The jurisdictional dimension is particularly important: third-party vendor risk ratings, the FCA observed, often lack internal challenge and may not reflect evolving evasion patterns that FATF and regulatory bodies have identified.

Screening Program Uplift

The FCA's SST findings point to a screening program that requires structured improvement across multiple dimensions: list management and data quality, matching logic configuration, calibration and assurance testing, and vendor oversight. Firms should not accept their current screening performance as a given. The 75% correct identification rate for name variations–even as an industry average–represents a substantial probability of false negatives that, given the scale of designations since 2022, has almost certainly resulted in undetected exposures at some institutions.

The specific failure modes the FCA identified–title and honorific integration, character limits, non-Latin script handling, phonetic matching–are solvable with modern screening technology and proper configuration governance.

Firms that cannot explain their vendor's matching logic are not in a position to challenge it, test it, or hold the vendor accountable for its performance.

Alert Management as Operational Risk

Alert management failures are not primarily technology failures–they are operational and governance failures. SLA breaches, escalation bypasses, inadequate handoffs, and poor-quality assurance over alert outcomes are products of culture, resourcing, and operational design. The FCA's emphasis on internal SLAs, documented investigation rationales, quality assurance over alert outcomes, and clearly defined escalation paths describes the minimum operational standard that the supervisory record now requires.

For institutions with large alert volumes, this creates a resourcing challenge that pure headcount cannot solve. The answer is triage intelligence: tools that help analysts prioritize their attention on the alerts most likely to represent genuine exposure, and that provide enough contextual information to enable faster, better-documented decisions. This is precisely the capability that AI-driven alert management platforms are designed to provide.

Evasion Typology Integration

The FCA's expectation–shared by OFAC–is that publicly available evasion typologies are reflected in firms' risk assessments, policies, transaction monitoring scenarios, and staff training. This is not an analytical capability requirement; it is a diligence requirement. Regulatory bodies have published extensive guidance on Russia-related sanctions evasion, maritime sector risks, cryptocurrency circumvention patterns, correspondent banking exploitation, and trade-based money laundering/sanctions evasion convergence. Firms that have not reviewed and acted on this guidance are behind the regulatory expectation curve in a way that is difficult to defend in a supervisory or enforcement context.

Beyond baseline typology integration, the FCA's good practice examples point to proactive, intelligence-led approaches: targeted investigations on high-risk segments, post-designation lookbacks, open-source corroboration of trade documentation, and alignment of TBML and sanctions second-line functions. These are the hallmarks of a control framework designed to detect sophisticated evasion, not just name matches.

Trade Sanctions: Building the Missing Capability

For institutions with material trade finance, correspondent banking, or maritime sector exposure, the FCA's findings constitute a call to action on trade sanctions capability. The controls needed to detect trade sanctions evasion–documentary analysis, goods classification screening, vessel tracking integration, open-source corroboration, and anomaly detection across free-text payment fields–require investment in both technology and human expertise. The good news is that the FCA has described what good practice looks like and the regulatory community is actively publishing the typology intelligence needed to calibrate controls.

Institutions should assess their current capability against the FCA's good practice framework:

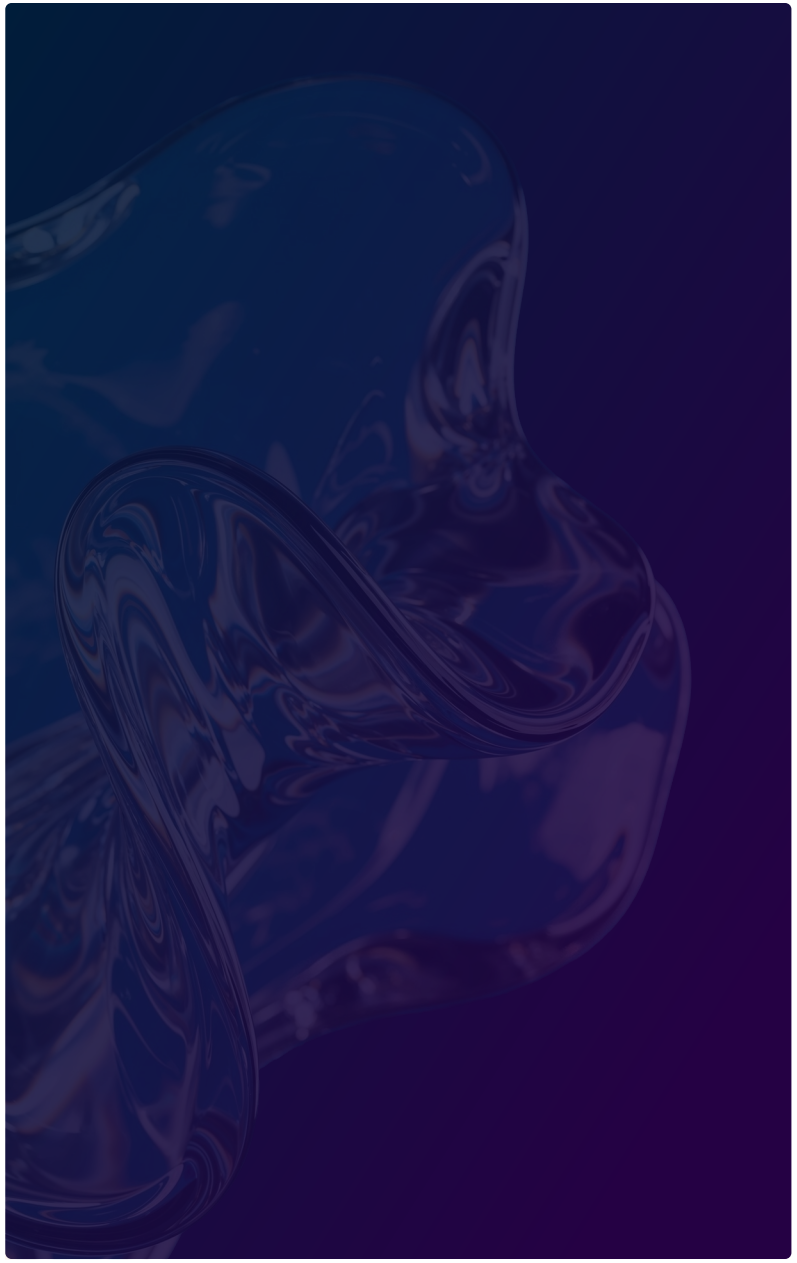
- Are they explicitly assessing trade sanctions risks across their product offerings and customer bases?
- Do their monitoring scenarios cover high-risk goods and jurisdictions?
- Are they using multiple complementary data sources to mitigate individual data gaps?
- Are they investing in automation to reduce manual processing burdens in trade document review?

The answers to these questions should drive a structured capability-building program.

Breach Reporting Culture

The FCA's reporting data–116 days average from identification to reporting–and its observation that many firms lacked documented procedures for reporting to OTSI and HMRC in addition to OFSI, together describe a breach reporting culture that has not yet aligned with regulatory expectations. The required shift is both procedural and cultural: procedural, because clear escalation and reporting procedures to all relevant authorities must be documented and tested; cultural, because the instinct to investigate exhaustively before reporting must be balanced against the regulatory and reputational benefits of prompt voluntary disclosure.

This is an area where OFAC's penalty calculus is instructive. Voluntary self-disclosure before OFAC has been cited repeatedly as a significant mitigating factor in civil penalty determinations. The FCA's posture is similar: firms that demonstrate proactive engagement with suspected breaches receive supervisory credit for that approach. The firm that reports promptly, takes immediate remedial action, and cooperates fully with the investigation is in a materially better regulatory position than one that identifies an issue and conducts an extended internal investigation before reporting.



Leveraging AI to Address the Regulatory Challenge

The Regulatory Signal on Technology

Both the FCA and OFAC have now explicitly signaled that AI and technology investment is not merely a competitive option but a compliance asset. The US Treasury's April 2026 AML/CFT Program NPRM lists the use of innovative tools such as artificial intelligence as an explicit factor in pre-enforcement considerations. The FCA's review describes firms exploring automation and AI in trade documentation analysis as examples of stronger practice. These signals, taken together, mean that firms which have not invested in AI-enabled compliance technology are not only at a capability disadvantage–they are operating without one of the recognized markers of a serious program.

The SRI platform is architected specifically for the compliance challenges that the FCA's review and OFAC's guidance have now jointly defined. The following sections describe how its capabilities map to the most significant compliance gaps identified.

Intelligent Risk Assessment

The FCA's finding that risk assessments are frequently static, siloed, and insufficiently granular points directly to the limitation of manual risk assessment methodologies. AI-driven risk assessment engines can address this by maintaining dynamic, continuously informed risk scores across customers, counterparties, products, and jurisdictions–drawing on internal transaction data, external sanctions intelligence feeds, adverse media, corporate structure data, and regulatory typology inputs simultaneously.

SRI's ThreatWatch capabilities enable institutions to move from periodic snapshot assessments to continuous risk intelligence, with scoring models that incorporate the multiple dimensions the FCA identifies as necessary: financial sanctions exposure, trade sanctions exposure, proliferation financing risk, beneficial

ownership complexity, and jurisdictional risk–each calibrated against the institution's own risk appetite and regulatory context. When the risk environment changes–a new designation event, a published typology advisory, a regulatory priority update–ThreatWatch updates automatically with input into the risk assessment.

Advanced Sanctions Screening

The FCA's screening findings point to a specific technical capability gap: the failure to reliably identify sanctioned parties where names appear in variant forms, include non-Latin characters, contain unusual formatting, or are presented in ways that defeat conventional fuzzy matching logic. These are precisely the cases that sophisticated adversaries exploit–the sanctions evader using a transliterated name variant or a close associate with a slightly different spelling is a known typology, documented in multiple regulatory advisories.

AI-powered screening addresses this through transformer-based name matching models trained on multilingual name variant datasets. These models understand that 'Vladimir Putin' and 'Vladimeer Pootin' and 'Влади́мир Пу́тин' may refer to the same party, and that Cyrillic, Arabic, Chinese, and other script variants of sanctioned names require dedicated treatment.

SRI's screening models go beyond phonetic matching to learn semantic name similarity–**reducing false negatives for name variants while controlling false positives through confidence scoring that supports risk-proportionate escalation decisions.**

Critically, **AI-driven screening also enables continuous calibration:** model performance is monitored against ground truth data, misconfiguration is identified before it produces undetected exposures, and the system can explain why a specific name did or did not generate an alert–addressing the FCA's observation that firms frequently could not understand or challenge their vendor's matching logic.

Intelligent Alert Management and Prioritization

The FCA's alert management findings–quarter of firms taking three to five days to resolve name screening alerts, SLA breaches widespread, escalation failures common–describe a function overwhelmed by volume and under-supported by intelligence. AI-driven alert management transforms this by providing triage-level intelligence at alert creation: contextual enrichment from adverse media, corporate registry data, transaction history, network relationships, and sanctions list cross-references that enables analysts to make faster, better-documented decisions.

SRI's alert management capabilities include predictive alert scoring–ranking alerts by their probability of representing genuine sanctions exposure–so that the highest-risk cases receive immediate attention regardless of when they were generated. This directly addresses the FCA's documented case where alert prioritization failures allowed assets to move after a designation event. AI-driven SLA monitoring and escalation triggers ensure that alerts that have not been resolved within defined timeframes are automatically escalated, removing the dependency on manual oversight that produced the bypass failures the FCA documented.

For institutions concerned about the quality assurance dimension–the FCA's emphasis on periodic testing of alert investigation quality–AI-driven quality assurance can sample and evaluate closed alerts systematically, identifying patterns in investigation quality, escalation decisions, and documentation completeness that manual QA processes would miss at scale.

Evasion Detection and Network Intelligence

The most significant AI capability for sanctions compliance may be its application to evasion detection–identifying the indirect, layered, and structurally complex relationships through which sanctioned parties access financial systems.

Graph-based network analytics, applied to customer relationship data, transaction flows, and beneficial ownership structures, can surface connections that are invisible to point-in-time screening and pattern-based transaction monitoring.

The FCA's case studies illustrate the kinds of connections that eluded conventional detection:

- funds routed through multiple intermediary payment processors to obscure links to designated Russian banks
- salary payments linked to vessels associated with designated persons
- customers receiving transfers from intermediaries linked to sanctioned oil transport networks, with no explicit high-risk indicators in the payment messages themselves

In each case, the connection was only identifiable through the combination of transaction pattern analysis, counterparty network mapping, and open-source intelligence–precisely the multi-source synthesis that AI-driven entity resolution platforms are designed to provide at scale.

SRI's network intelligence capabilities enable institutions to build an entity graph that connects customers, counterparties, transactions, and external data sources into a unified analytical environment.

Emerging evasion patterns–the FCA's post-designation fund movement, the shadow fleet vessel network, the cryptocurrency rerouting through layered e-money wallets–can be modeled as graph-based scenarios and applied continuously across the customer base, enabling proactive detection rather than reactive breach response.

Trade Documentation Analysis

Trade sanctions compliance represents a distinct AI application domain. The challenge of analyzing trade documents–bills of lading, letters of credit, certificates of origin, end-user declarations–for anomalies, inconsistencies, and potential sanctions indicators is structurally similar to the document analysis problems that large language models and computer vision systems are well-suited to address.

AI-driven trade document analysis can:

- identify discrepancies between stated and probable goods descriptions
- flag shipping routes inconsistent with declared origins
- surface vessel identifiers linked to sanctioned operators
- cross-reference counterparty information against designated entity and shadow fleet databases
- detect formatting inconsistencies consistent with document falsification

All at a speed and scale that manual processing cannot achieve.

The FCA's observation that firms exploring automation and AI for trade document review represent stronger practice is not merely descriptive–it is directional. Institutions with material trade finance, maritime, or commodity sector exposure should treat AI-assisted documentary analysis as a component of their trade sanctions control framework, not a future aspiration.

Regulatory Intelligence and Change Management

One of the persistent governance failures the FCA identified is the failure to maintain current sanctions policies and to incorporate regulatory developments – new designations, updated guidance, emerging typologies–into firm controls in a timely manner. This is a regulatory change management problem as much as a sanctions compliance problem, and it is one where AI-powered regulatory intelligence tools provide direct capability.

SymphonyAI's RegWatch provides agentic regulatory monitoring across the FCA, OFAC, OFSI, OTSI, FATF, and other relevant authorities, surfacing relevant regulatory developments and mapping them to the institution's specific risk profile and control framework.

When the FCA publishes new guidance, when OFSI issues a new designation, when OFAC publishes an advisory on a new evasion typology, RegWatch surfaces the development, assesses its relevance, and supports the workflow through which it is incorporated into policies, procedures, and control calibrations. This addresses the governance gap the FCA identified as a characteristic of weaker firms: the failure to maintain current, accurate policies that reflect the full range of applicable sanctions restrictions.

Asset Freezing and License Compliance Management

The procedural failures the FCA identified in asset freezing and license compliance–unclear restriction procedures, missing SLAs, staff uncertainty about how to apply account restrictions, absence of policies defining license conditions–are amenable to process automation and workflow management solutions that ensure consistent application of required procedures regardless of individual staff knowledge or operational pressure.

AI-driven case management for sanctions designations can enforce the required procedural steps–account restriction triggers, escalation requirements, documentation obligations–through structured workflow automation, ensuring that the gap between designation event identification and account restriction is measured in minutes rather than days.

License compliance management capabilities can codify the terms of active licenses, monitor transaction compliance against those terms, and flag approaching limits or conditions that require specific action–replacing the informal and undocumented arrangements the FCA found in too many firms.

A Framework for Action

Prioritization by Risk

Financial institutions should treat the FCA's findings not as a UK-specific regulatory report but as a cross-jurisdictional assessment of the sanctions compliance gaps most likely to generate regulatory action–whether from the FCA, OFAC, OFSI, OTSI, or their counterparts in other jurisdictions. The convergence between the FCA's 2026 findings and OFAC's established compliance framework means that a remediation program designed to address the FCA's gaps will simultaneously strengthen the institution's posture under OFAC's program expectations.

Priority remediation should focus on the areas where the FCA identified both the highest frequency of breach causation and the widest gap between current and expected practice:

- screening calibration and assurance
- alert management and SLA governance
- risk assessment granularity and trade sanctions integration
- evasion typology embedding
- breach reporting procedures

The Gap Assessment Imperative

Both the FCA's review and Treasury's AML/CFT NPRM signal an expectation that institutions will conduct structured, evidenced gap assessments of their compliance frameworks against current regulatory standards–not wait for supervisory engagement to identify deficiencies. For sanctions compliance, this means mapping current control performance against the FCA's good practice framework, the OFAC five-component model, and the institution's own documented risk profile and appetite.

The gap assessment should produce a prioritized remediation plan with clear ownership, documented timelines, and measurable outcomes. Critically, it should also assess whether the institution has the technology infrastructure to support ongoing evidence of effectiveness–because both regulators are moving toward frameworks in which demonstrating effectiveness, not merely documenting process, is the compliance standard.

The Technology Investment Case

The regulatory signal is clear: AI and technology investment in sanctions compliance is not merely operationally beneficial–it is now a recognized indicator of a robust compliance program, explicitly referenced by regulators as a factor in their assessment of compliance program quality and, in OFAC's formulation, their pre-enforcement deliberations. Institutions that have not yet built or procured AI-driven capabilities for screening, alert management, network intelligence, threat & regulatory intelligence monitoring, and trade document analysis are operating at a growing disadvantage–in both risk exposure and regulatory posture.

The investment case for AI-driven sanctions compliance should be evaluated not only against the operational benefits–higher detection rates, faster alert resolution, lower false positive volumes, reduced manual processing burden–but against the regulatory cost of the status quo. The FCA's review, and OFAC's enforcement record, provide ample evidence of what that cost looks like when it crystallizes.

The convergence between the FCA's 2026 sanctions assessment and OFAC's longstanding compliance framework is not coincidental. It reflects the emergence of a genuine global standard for what sanctions compliance must look like: risk-based, intelligence-led, technology-enabled, and demonstrably effective. Financial institutions operating across jurisdictions face a choice: build to that standard proactively or build to it reactively under regulatory pressure. The difference, as both bodies of regulatory evidence show, is measured in material control gaps, avoidable breaches, and enforcement exposure.

Conclusion

The FCA's May 2026 sanctions review is a detailed, evidence-based assessment of where UK financial services stand on sanctions compliance. Its findings are sobering–not because they describe a sector that has failed, but because they describe a sector that is improving in some areas while remaining structurally vulnerable in others. The vulnerabilities the FCA identifies–governance gaps, screening deficiencies, alert management weaknesses, trade sanctions immaturity, and evasion detection blind spots–are not new. They are the same vulnerabilities that OFAC has been documenting through its enforcement actions and guidance for years.

The convergence between these two bodies of regulatory intelligence tells us something important: the regulatory community has, across jurisdictions, arrived at a shared understanding of what effective sanctions compliance requires. That understanding is outcome-focused, risk-proportionate, and technology-inclusive. It rewards firms that can demonstrate–not merely assert–that their programs work.

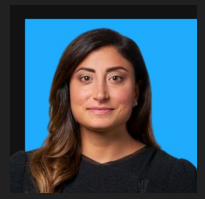
For SymphonyAI's SRI platform, this regulatory environment is precisely the context for which the technology was built. Dynamic threat intelligence and risk assessment, advanced screening with multilingual name matching, intelligent alert management, graph-based evasion detection, AI-assisted trade document analysis, and threat and regulatory change monitoring together address the specific gaps that both the FCA and OFAC have identified as most consequential. The question for financial institutions is not whether to invest in these capabilities, but how quickly.

The answer, in both regulatory jurisdictions, is: **urgently.**

Sources

- FCA, Sanctions Systems and Controls in Our Firms: Our Findings (May 2026)
- FCA, Sanctions Systems and Controls: Firms' Response to Increased Sanctions Due to Russia's Invasion of Ukraine (September 2023)
- OFAC, Framework for OFAC Compliance Commitments (May 2019)
- FinCEN/OFAC/Federal Banking Agencies, AML/CFT Program NPRM (April 2026), 91 Fed. Reg. 18704
- OFAC Civil Penalties and Enforcement Actions, 2022–2026 (including Binance Holdings, GVA Capital, Vietnam Beverage, Córdoba Music Group)
- OFAC/DOJ/BIS, Tri-Seal Compliance Note: Detecting and Reporting Sanctions and Export Control Evasion (March 2023)
- OFAC/DOJ/Commerce, Tri-Seal Compliance Note: Obligations of Foreign-Based Persons (March 2024)
- OFAC, Quint-Seal Compliance Note: Know Your Cargo (Maritime Best Practices)
- OFSI/OTSI, UK Sanctions Implementation Guidance
- FATF, Guidance on Proliferation Financing Risk Assessment and Mitigation
- HM Government, Countering Russian Sanctions Evasion: Guidance for Businesses

About the Author



Elizabeth Callan is a recognized leader and innovator in the fight against money laundering and financial crime with over 25 years of experience across intelligence, law enforcement, and the private sector.

At SymphonyAI, she is at the forefront of redefining the future of financial crime compliance and risk management. She drives strategy and innovation, developing groundbreaking AI-led, intelligence-driven solutions that are transforming how global institutions detect, disrupt, and prevent money laundering, sanctions evasion, and other sophisticated financial crimes. Her work is helping shift the industry approach from reactive, technical compliance to proactive, risk-aligned, and highly effective risk management.

Prior to SymphonyAI, Elizabeth served in the U.S. intelligence and law enforcement communities. As a Senior Intelligence Analyst at the U.S. Department of the Treasury, she shaped high-impact U.S. policy and enforcement actions – including Section 311 designations – while directly advising senior officials at OFAC and FinCEN on critical threats and national security strategies. She also served as Intelligence Liaison and Senior Advisor to the DEA's Special Operations Division, where she led complex, large-scale money laundering investigations, enhanced intelligence collection efforts, trained law enforcement agents and analysts, and forged strong international partnerships.

In the private sector, Elizabeth has held leadership roles in financial institutions and consulting firms, where she built and managed investigations teams, designed robust AML and sanctions programs, and developed risk management strategies for complex products and services.

A recognized subject matter expert, Elizabeth teaches AML and sanctions courses at the university level. She holds a master's degree in economics and the prestigious ACAMS Advanced Certification in Financial Crimes Investigations (CAMS-FCI).

About SymphonyAI

SymphonyAI, is building the leading enterprise AI SaaS company for digital transformation across the most critical and resilient growth verticals, including retail, consumer packaged goods, finance, manufacturing, media, and IT/enterprise service management. SymphonyAI verticals have 2000 leading enterprises as clients globally. Since its founding in 2017, SymphonyAI has grown rapidly to 3,000 talented leaders, data scientists, and other professionals. SymphonyAI is an SAI Group company, backed by a $1 billion commitment from Dr. Romesh Wadhwani, a successful entrepreneur and philanthropist.

SymphonyAI provides AI-focused SaaS solutions developed from the ground up for fighting financial crime. An end-to-end offering compiled from more than 25 years of knowledge in tackling money laundering and fraud, our award-winning product ecosystem comprises an innovative and modern approach to financial crime investigation using world-leading predictive and gen AI. From KYC/CDD and transaction monitoring through to payments fraud, entity resolution, and sanctions, PEP, and adverse media screening, SymphonyAI is a trusted name in finance technology with more than a third of the world's top 100 banks enjoying the power, efficiency, effectiveness and productivity that our solutions provide.

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Get in touch to discuss how your organization can build a more effective, scalable, and continuously aligned financial crime program across insurance and investment advisory operations using AI-enabled screening, monitoring, network analytics, and intelligent automation.

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