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THE APPLICATION OF ARTIFICIAL INTELLIGENCE IN COMBATING FINANCIAL CORRUPTION IN THE MIDDLE EAST AND IMPLEMENTATION CHALLENGES BASED ON THE EUROPEAN EXPERIENCE

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Abstract. Purpose: This study builds upon the analytical framework of the reference paper concerning the digital transformation in anti-money laundering (AML) and counter-terrorism financing (CFT) in Europe. It aims to examine the feasibility, challenges, and requirements of implementing artificial intelligence (AI) tools in financial anti-corruption systems in Middle Eastern countries. The authors argue that despite the significant enthusiasm shown by regional countries toward adopting AI in this domain, a notable gap exists between "willingness" and "implementation capacity," rooted in structural, regulatory, and infrastructural challenges. The European experience particularly the proposed EU Artificial Intelligence Act, the FATF San Jose Principles, and the OECD AI Principles can serve as a model for developing a balanced framework that ensures operational efficiency while safeguarding fundamental rights. Design/Methodology/Approach: This research employs a qualitative comparative method, utilizing document analysis, international reports, legislation, and legal and financial studies in the field of AML/CFT digital transformation. The data used include FATF reports, OECD principles, the proposed EU Artificial Intelligence Act, reports from international financial institutions, and case studies from selected Middle Eastern countries. Findings: The findings indicate that: (1) Middle Eastern countries face multiple structural challenges, including poor data quality, lack of specialized expertise, absence of a coherent governance framework, and regulatory fragmentation; (2) the European experience in balancing innovation and the protection of fundamental rights through a risk-based approach offers valuable lessons for the region; (3) successful AI implementation in the Middle East requires simultaneous investment in three areas: technology, legislation, and human resources; and (4) a gradual, pilot-based approach particularly in areas such as transaction monitoring and customer identification can be the most effective implementation path. Originality/Value: This study is one of the first to systematically examine the application of AI in combating financial corruption in the Middle East, drawing on the European regulatory framework while considering FATF, OECD, and EU AI Act principles. It also analyzes, for the first time, the Albanian experience of appointing a "Minister for Artificial Intelligence" within the context of EU accession efforts as a model potentially replicable in the region.

Keywords: Anti-Money Laundering (AML), Artificial Intelligence (AI), Middle East, Financial Corruption, Implementation Challenges, European Experience, Financial Action Task Force (FATF), EU Artificial Intelligence Act

Introduction

The deployment of new technologies to combat money laundering and terrorist financing has been welcomed as a "game-changing" development [1]. Artificial intelligence and its subsets, including machine learning and natural language processing, promise significant improvements in the efficiency and accuracy of compliance systems [2]. The broader machine-learning transformation of organizational decision-making also reinforces the potential of these technologies in complex compliance environments [3]. However, what has received less attention in the existing literature is the transferability and adaptability of this successful experience to regions with different economic, social, and regulatory contexts.

The Middle East, as a region characterized by considerable diversity in development levels, regulatory frameworks, and technological capacity, faces unique challenges in combating financial corruption. On one hand, Gulf Cooperation Council (GCC) countries have made substantial investments in modern technologies and have shown strong interest in adopting AI for financial-crime compliance [4]. On the other hand, structural challenges such as poor data quality, lack of specialized expertise, absence of a coherent governance framework, and regulatory fragmentation hinder effective implementation. This study is inspired by international work on the digital transformation of AML/CFT systems and the opportunities and challenges associated with new technologies [5]. It also draws on the OECD Principles on Artificial Intelligence [6] and the European Union risk-based regulatory approach to AI [7]. Accordingly, the study seeks to answer the following fundamental question: What lessons can be drawn from the European experience in balancing digital innovation and the protection of fundamental rights that can be transferred to the Middle East, and what specific implementation challenges does the region face in this process?

The significance of this research is threefold. First, the growing volume and complexity of suspicious financial activity increases the need for intelligent monitoring and analytical solutions [5]. Second, Middle Eastern countries, due to their geopolitical position and central role in international financial flows, are exposed to high risks of money laundering and terrorist financing, while facing unique challenges such as diverse legal systems, fragmented regulatory bodies, and, in some cases, weak information transparency. Third, the European experience in formulating a comprehensive AI regulatory framework can serve as a model for other regions, including the Middle East [7].

This research is structured as follows: Section 2 examines the current state of AI adoption in combating financial corruption in the Middle East; Section 3 discusses key implementation challenges based on the analytical framework of the reference paper, considering the three levels of technology, legislation, and human resources; Section 4 extracts transferable lessons from the European experience, focusing on the three key documents (FATF San Jose Principles, OECD AI Principles, and the EU Artificial Intelligence Act); Section 5 proposes an implementation framework for the gradual adoption of AI in the Middle East; and the conclusion offers recommendations for future research and policy measures.

Methods

This study employed a qualitative comparative research design to examine the application of artificial intelligence (AI) in combating financial corruption in Middle Eastern countries and to identify lessons that can be transferred from the European experience. The qualitative approach was considered appropriate because the study focuses on regulatory frameworks, institutional readiness, technological implementation, governance mechanisms, and policy challenges rather than on measuring statistical relationships among variables. The comparative perspective enabled the study to systematically examine similarities and differences between the emerging AI-based anti-money laundering and counter-terrorism financing (AML/CFT) practices in the Middle East and the more developed regulatory and governance approaches adopted in Europe.

The study relied primarily on secondary data collected through document analysis. The documentary sources included international institutional reports, regulatory documents, legislation, policy frameworks, academic literature, and relevant legal and financial studies addressing AI, financial corruption, AML/CFT, digital transformation, data governance, and financial regulation. Particular attention was given to authoritative international frameworks, including publications of the Financial

Action Task Force (FATF), the Organisation for Economic Co-operation and Development (OECD), and European Union regulatory documents concerning artificial intelligence. These sources were selected because they provide internationally recognized principles concerning risk-based regulation, transparency, accountability, explainability, human oversight, data protection, and responsible implementation of AI.

The selection of documents was conducted purposively according to their relevance to the research objectives. Documents were included when they addressed at least one of the main analytical dimensions of the study: AI implementation in AML/CFT systems, technological and data infrastructure, regulatory and legal frameworks, organizational and human-resource readiness, fundamental-rights protection, or AI governance. Priority was given to documents issued by recognized international organizations, regulatory authorities, academic publishers, and institutions directly involved in financial-crime prevention. Regional reports and selected country experiences were additionally examined to capture variations in technological capacity, institutional development, regulatory maturity, and financial-sector characteristics across Middle Eastern countries.

Data analysis was conducted through qualitative content analysis and comparative thematic analysis. First, the collected documents were reviewed and relevant information was extracted according to the objectives of the study. Second, the extracted evidence was classified into three principal dimensions: technical and infrastructural challenges, regulatory and legal challenges, and human and organizational challenges. Third, European regulatory and governance principles were analyzed in relation to these dimensions, particularly the risk-based approach, transparency and explainability requirements, human oversight, fundamental-rights protection, and international regulatory cooperation. Finally, the findings from the Middle Eastern context were compared with European practices to determine which principles could reasonably be adapted to regional institutional, economic, legal, and technological conditions.

To strengthen the reliability of the analysis, the study applied source triangulation by comparing information obtained from international organizations, regulatory documents, academic studies, and regional reports. Rather than relying on a single institutional perspective, conclusions were developed from recurring themes and converging evidence across multiple sources. Particular attention was paid to differences in regulatory environments and levels of technological readiness among Middle Eastern countries to avoid treating the region as institutionally homogeneous. The analysis therefore emphasizes contextual adaptation rather than direct replication of the European model.

Based on the comparative analysis, the study subsequently developed a phased implementation framework for AI adoption in financial anti-corruption systems in the Middle East. The framework was constructed by synthesizing identified regional challenges with transferable European and international governance principles. The resulting stages comprise readiness assessment and roadmap development, formulation of regulatory and legal frameworks, implementation of pilot programs, expansion and scaling, and continuous evaluation and improvement. This analytical procedure allows the study not only to identify existing implementation barriers but also to translate comparative findings into practical policy and institutional recommendations for the responsible adoption of AI in AML/CFT systems.

Results and Discussion

2. Current State of AI Adoption in Combating Financial Corruption in the Middle East

2.1. General Overview

The Middle East has witnessed remarkable growth in investment in modern technologies, particularly artificial intelligence, in recent years. Countries such as the United Arab Emirates, Saudi Arabia, and Qatar, through the formulation of national AI strategies, have sought to become regional hubs for this technology. In the area of AML/CFT, financial institutions in the region have gradually begun moving toward the use of AI-based tools to improve customer due diligence (KYC) and transaction monitoring processes [8].

However, the speed and depth of this transformation are not uniform across the region. While GCC countries, benefiting from extensive financial resources and relatively advanced infrastructure, have made effective strides in this direction, other countries face more serious challenges due to political instability, sanctions exposure, and weak infrastructure. Recent regional financial-crime assessments

also emphasize the evolving and uneven threat landscape across the GCC and surrounding markets [8]. This regional heterogeneity constitutes one of the most significant challenges to establishing a coordinated regional framework for AI adoption in combating financial corruption.

2.2. Current Applications of AI in AML/CFT Systems in the Region

Based on available reports, the main applications of AI in AML/CFT systems in the Middle East can be summarized in the following two areas:

a) Customer Due Diligence (KYC): AI-based tools in this area help financial institutions improve identity verification and customer risk rating processes by utilizing diverse data sources such as identity documents, biometric data, corporate ownership information, regulatory lists, and Politically Exposed Persons (PEP) records [9]. These tools are particularly important in the Middle East, given its linguistic and cultural diversity, where natural language processing tools can help identify suspicious patterns in customer communications.

b) Transaction Monitoring: Machine learning-based systems in this area enable financial institutions to process vast amounts of transaction data in real time, analyze customer behavioral patterns, and identify anomalies and suspicious activities with greater speed and accuracy. Machine-learning applications have shown potential to reduce the operational burden created by large numbers of false-positive alerts [10]. Earlier industry analysis likewise identified false-positive reduction as a major opportunity for more efficient AML monitoring [11]. The potential of these technologies to enhance the efficiency of AML/CFT systems in the region is therefore significant.

2.3. Notable Case Study: The Albanian Experience of Appointing a Minister for Artificial Intelligence

One of the most interesting and relevant experiences in the region (given the comparative approach of this study with the European experience) is the Albanian government's appointment of a "Minister for Artificial Intelligence" named "Dila" to oversee public procurement processes. This measure, taken within the framework of Albania's efforts to join the European Union, reveals important lessons for Middle Eastern countries:

Positive Aspects:

Elimination of the possibility of bribery and human bias in procurement decisions

Increased transparency and auditability of processes

Providing a model for other regional countries seeking to use AI in governance

Challenges and Warnings:

Executives of the organization that developed this system were accused of corruption: This indicates that even the most intelligent systems remain vulnerable to influence and corruption in the absence of a transparent governance framework.

Lack of a legal framework for the accountability of the digital minister: This reflects the gap between technological innovation and regulatory frameworks, which, if ignored, can lead to crises of trust.

Risk of system infiltration and manipulation by hackers: Cybersecurity represents a serious challenge in deploying AI in sensitive areas such as anti-corruption efforts.

More symbolic than substantive: Critics believe that this measure is more symbolic than having a real impact on reducing corruption.

This experience offers valuable lessons for Middle Eastern countries that may eagerly seek to implement similar systems, but need to develop regulatory, security, and governance frameworks before taking any action.

3. Key Challenges in Implementing AI in Combating Financial Corruption in the Middle East

Based on the analytical framework of the reference paper and considering the region's specific conditions, the challenges of AI implementation in the Middle East can be categorized into the following three levels:

3.1. Technical and Infrastructural Challenges

Data Quality and Integration: The effectiveness of AI systems depends heavily on the quality, consistency, and interoperability of the data used for training and operational analysis [12]. In many Middle Eastern countries, financial and identity data are stored in separate information silos with different standards, complicating their integration.

Information Technology Infrastructure: Although wealthy countries in the region have made substantial investments in IT infrastructure, a significant gap remains between these countries and other parts of the region. This disparity hinders the establishment of a coordinated regional

framework.

Cybersecurity: Given the sensitivity of financial and personal data, cybersecurity for AI-based systems is of critical importance. The Albanian experience demonstrated that even advanced systems are not immune to cyberattacks and infiltration.

3.2. Regulatory and Legal Challenges

Regulatory Fragmentation and Inconsistency: While the European Union, through the AI Act, seeks to establish a harmonized and risk-based regulatory framework [7], Middle Eastern countries exhibit considerable diversity in laws and regulations related to AML/CFT and AI. Some jurisdictions also differ substantially in data protection, privacy, and supervisory maturity.

Absence of AI Governance Framework: Weak AI governance carries multiple risks, including algorithmic discrimination, privacy violations, and lack of transparency in decision-making [13]. These risks become more serious when institutions deploy models without clear accountability, validation, and oversight mechanisms.

Conflict with Religious and Cultural Norms: In some regional countries, the use of facial recognition and biometric technologies may conflict with cultural and religious beliefs. This necessitates the development of a framework that simultaneously benefits from AI advantages while respecting the region's cultural values.

3.3. Human and Organizational Challenges

Lack of Specialized Expertise: The effective use of new technologies in AML/CFT requires personnel who understand data, financial-crime typologies, model limitations, and supervisory requirements [5]. The shortage of such expertise is particularly important in jurisdictions where specialized educational and professional training systems remain underdeveloped.

High Costs: 46% of institutions cited high costs and data barriers as the main obstacle to AI scalability. Given that many regional countries are facing falling oil prices and economic challenges, allocating sufficient budgets for such investments is difficult.

Organizational Resistance to Change: Traditional AML/CFT systems are deeply entrenched in many regional institutions, and employees may resist the shift toward AI-based systems, slowing the digital transformation process.

Regulators' Lack of Familiarity with Modern Technologies: Effective oversight of AI-based systems requires a deep understanding of how these technologies work. Supervisory authorities must be able to evaluate innovative customer due-diligence solutions, model governance, and associated compliance risks [14]. Insufficient technical familiarity increases the risk of ineffective supervision.

4. Transferable Lessons from the European Experience

Based on the reference paper, which comprehensively analyzed three key documents in AI governance, the following transferable lessons for the Middle East can be derived:

4.1. Risk-Based Framework (The EU AI Act Approach)

The European Union Artificial Intelligence Act adopts a risk-based approach in which regulatory obligations vary according to the level and nature of risk posed by an AI system [7]. This approach is highly relevant for Middle Eastern countries facing resource constraints, as it enables them to focus regulatory resources on high-risk applications and avoid disproportionate burdens on lower-risk systems.

Practical Application for the Region: Middle Eastern countries, drawing on this approach, can classify their AI systems in the AML/CFT field according to the level of risk they pose (in terms of privacy violations, discrimination, systemic errors, etc.) and define proportionate regulatory requirements for each level.

4.2. Transparency, Explainability, and Human Oversight

The OECD Principles emphasize transparency, accountability, and responsible disclosure regarding AI systems so that affected parties and competent authorities can understand and, where appropriate, challenge outcomes [6]. In the AML/CFT context, transparency does not necessarily mean informing targeted individuals because of anti-tipping-off rules; rather, it requires sufficient explainability for competent authorities and supervisors.

Furthermore, the EU AI regulatory framework emphasizes effective human oversight for high-risk AI systems [7]. Human reviewers should be able to understand system outputs, recognize limitations, intervene when necessary, and prevent automated recommendations from becoming unreviewable

decisions.

Practical Application for the Region: Middle Eastern countries should require in their legislation that all AI systems used in the AML/CFT field be explainable, and that their results be reviewed by qualified human analysts. Mechanisms for independent auditing of these systems should also be provided.

4.3. Protection of Fundamental Rights and Prevention of Discrimination

Improperly designed AI-based AML systems may undermine due process, equal protection, privacy, and transparency [15]. These concerns are especially important where automated risk scoring or surveillance practices may reproduce discriminatory patterns.

Practical Application for the Region: Given the ethnic, linguistic, and religious diversity of the Middle East, preventing algorithmic discrimination is of particular importance. Regional countries should ensure that AI systems are trained on appropriate and representative data and should establish safeguards for automated profiling and decision-making [16]. Effective oversight mechanisms are also needed to identify and correct potential discrimination.

4.4. International Cooperation and Regulatory Harmonization

International experience emphasizes the need for coordinated action among financial intelligence units, data-protection authorities, regulators, and operational agencies when deploying digital AML/CFT tools [17]. Such cooperation is necessary to reduce legal fragmentation, improve data governance, and align new technologies with international standards.

Practical Application for the Region: Middle Eastern countries, while cooperating with international bodies such as FATF and OECD, should work toward establishing a coordinated regional framework for AI adoption in combating financial corruption. This framework can include experience sharing, standard harmonization, and the creation of joint mechanisms to combat cross-border financial crimes.

4.5. Gradual and Pilot-Based Approach

The European experience demonstrates that digital transformation in financial regulation should not be conducted all at once or without proportionate safeguards. A staged approach can help jurisdictions balance innovation with regulatory control and institutional learning [18]. Appropriate transition periods, pilot programs in limited areas, and continuous performance evaluation are therefore important implementation principles.

Practical Application for the Region: Middle Eastern countries should begin with pilot programs in high-impact, low-risk areas (for example, monitoring small transactions in a specific sector), carefully evaluate system performance, and then gradually expand its scope. This approach reduces implementation risks and enables learning from mistakes.

5. Proposed Implementation Framework for AI Adoption in the Middle East

Based on the foregoing analysis, the following implementation framework is proposed for the gradual and effective adoption of AI in financial anti-corruption systems in Middle Eastern countries:

5.1. Phase One: Readiness Assessment and Roadmap Development (6–12 months)

Assessment of existing infrastructure: Evaluating data quality, information systems integration, cybersecurity level, and human resource capabilities in each country.

Development of a national roadmap: Defining short-term, medium-term, and long-term objectives, taking into account each country's priorities and constraints.

Establishment of governance structures: Forming a national working group comprising representatives from regulatory bodies, financial institutions, technology companies, and academia.

Conducting orientation training programs: Familiarizing key stakeholders with the benefits, challenges, and requirements of AI adoption.

5.2. Phase Two: Formulation of the Regulatory and Legal Framework (12–18 months)

Amendment of existing legislation: Updating AML/CFT and data protection laws to address AI requirements.

Development of implementing guidelines: Defining minimum standards for AI systems in the areas of transparency, explainability, human oversight, and cybersecurity.

Creation of oversight mechanisms: Developing methods for auditing and evaluating the performance of AI-based systems.

Regional coordination: Initiating dialogue with neighboring countries to establish common frameworks and share experiences.

5.3. Phase Three: Implementation of Pilot Programs (18–24 months)
Selection of pilot areas: Starting with low-risk, high-impact areas such as monitoring electronic transactions in a specific sector.
Selection of leading institutions: Partnering with financial institutions that have appropriate infrastructure and a willingness to innovate.
Implementation of pilot systems: Deploying AI-based tools on a limited scale under close supervision.
Continuous evaluation: Measuring system performance in terms of accuracy, efficiency, reduction of false positives, and impact on fundamental rights. Predictive models used for suspicious-activity reporting should be assessed continuously to determine which features remain relevant and whether model outputs improve reporting quality [19].
5.4. Phase Four: Expansion and Scaling (24–36 months)
Expansion to other areas: After the success of pilot programs, extending the system to other AML/CFT areas such as customer identification and asset tracing.
System integration: Creating common platforms for data sharing and collaboration between financial institutions and FIUs.
Investment in human resources: Developing specialized training programs and recruiting skilled personnel in data science and AI.
International cooperation: Active participation in international forums and exchange of experiences with leading countries in this field.
5.5. Phase Five: Continuous Evaluation and Improvement (Long-term)
Periodic evaluation: Reviewing system performance at regular intervals and identifying areas for improvement.
Algorithm updates: Adapting AI models to new money-laundering typologies and emerging criminal methods. Because AI can accelerate financial-crime detection but is not a complete substitute for expert judgment, periodic model review and recalibration remain necessary [20].
Regulatory review: Updating the regulatory framework based on practical experience and technological developments.
Expanding cooperation: Establishing regional and international networks to combat cross-border financial crimes.

Conclusions and Recommendations

Key Findings
This research demonstrated that although Middle Eastern countries show great enthusiasm for applying AI in combating financial corruption, there is a significant gap between "willingness" and "implementation capacity." This gap is rooted in multiple challenges, including poor data quality, lack of specialized expertise, absence of a coherent governance framework, regulatory fragmentation, and high costs.
The European experience, well articulated in the reference paper, shows that success in this area requires simultaneous investment in three areas: technology (data infrastructure and explainable intelligent systems), legislation (transparent risk-based regulatory framework), and human resources (training, empowerment, and recruitment of skilled professionals).
Policy Recommendations
Establishing an AI Governance Framework: Middle Eastern countries, drawing on the EU Artificial Intelligence Act, should formulate national legislation that defines minimum requirements for AI systems in financial anti-corruption areas, with emphasis on transparency, explainability, human oversight, accountability, and data protection [21].
Investment in Data Infrastructure: Governments and financial institutions should work to improve data quality and standardization, and create common platforms for information sharing, consistent with privacy protection laws.
Human Capacity Building: Specialized educational and training programs in data science, AI, and financial crime prevention should be developed, and skilled personnel should be recruited from domestic and international sources.
Adoption of a Gradual Approach: Starting with pilot programs in limited, low-risk areas, carefully evaluating performance, and then gradually expanding, with appropriate transition periods for

institutions to adapt to new requirements.
Strengthening Regional and International Cooperation: Middle Eastern countries should work toward establishing a coordinated regional framework for AI adoption in combating financial corruption, and actively participate in international forums to share experiences and harmonize standards.

References

[1] McKinsey & Company, "The fight against money laundering: Machine learning is a game changer," McKinsey Insights, New York, NY, USA, 2022.
[2] J. McCarthy, "The regulation of RegTech and SupTech in finance," Journal of Financial Regulation and Compliance, 2022, doi: 10.1108/JFRC-01-2022-0004.
[3] E. Brynjolfsson and A. McAfee, "What's driving the machine learning explosion," Harvard Business Review, Jul. 2017.
[4] SymphonyAI and AML Intelligence, FinCrime Frontier 2025–26 Report: AI and Financial Crime Compliance in the EMEA Region. London, U.K.: AML Intelligence, 2025.
[5] Financial Action Task Force, Opportunities and Challenges of New Technologies for AML/CFT. Paris, France: FATF, 2021.
[6] Organisation for Economic Co-operation and Development, Recommendation of the Council on Artificial Intelligence, OECD/LEGAL/0449. Paris, France: OECD Publishing, 2019.
[7] European Commission, "Proposal for a regulation laying down harmonised rules on artificial intelligence (Artificial Intelligence Act)," COM/2021/206 final, Brussels, Belgium, 2021.
[8] Themis, Annual Horizon Scanning Report: Evolving Financial Crime Threat Landscape Across the GCC. Dubai, United Arab Emirates: Themis, 2026.
[9] D. Arner et al., "The identity challenge in finance: From analogue identity to digitized identification to digital KYC utilities," European Business Organization Law Review, vol. 20, no. 1, pp. 55–80, 2019.
[10] Institute of International Finance, Machine Learning in Anti-Money Laundering, IIF Summary Report. Washington, DC, USA: IIF, 2018.
[11] S. Breslow et al., The New Frontier in Anti-Money Laundering. New York, NY, USA: McKinsey & Company, 2017.
[12] Financial Action Task Force, Stocktake on Data Pooling, Collaborative Analytics and Data Protection. Paris, France: FATF, 2021.
[13] S. Feuerriegel, M. Dolata, and G. Schwabe, "Fair AI: Challenges and opportunities," Business & Information Systems Engineering, vol. 62, no. 4, pp. 379–384, 2020.
[14] European Supervisory Authorities, "Opinion on the use of innovative solutions in customer due diligence," ESA Opinion JC 2017 81, 2018.
[15] A. Bertrand, W. Maxwell, and X. Vamparys, "Do AI-based anti-money laundering (AML) systems violate European fundamental rights?" International Data Privacy Law, vol. 11, no. 3, pp. 276–295, 2021.
[16] Article 29 Data Protection Working Party, "Guidelines on automated individual decision-making and profiling," Guidelines, vol. 17, pp. 251–268, 2018.
[17] Financial Action Task Force and Egmont Group, Digital Transformation of AML/CFT for Operational Agencies. Paris, France: FATF, 2021.
[18] G. Pavlidis, "Europe in the digital age: Regulating digital finance without suffocating innovation," Law, Innovation and Technology, vol. 13, no. 2, pp. 464–477, 2022.
[19] E. Hayble-Gomes, "The use of predictive modeling to identify relevant features for suspicious activity reporting," Journal of Money Laundering Control, 2022, doi: 10.1108/JMLC-02-2022-0034.
[20] P. Yeoh, "Artificial intelligence: Accelerator or panacea for financial crime?" Journal of Financial Crime, vol. 26, no. 2, pp. 634–646, 2019.
[21] H.-W. Liu, C.-F. Lin, and Y.-J. Chen, "Beyond State v. Loomis: Artificial intelligence, government algorithmization and accountability," International Journal of Law and Information Technology, vol. 27, no. 2, pp. 122–141, 2019.