

Agentic AI in Credit: Unlocking Value While Managing the New AI Risks

ABI: Credito al Credito 2026

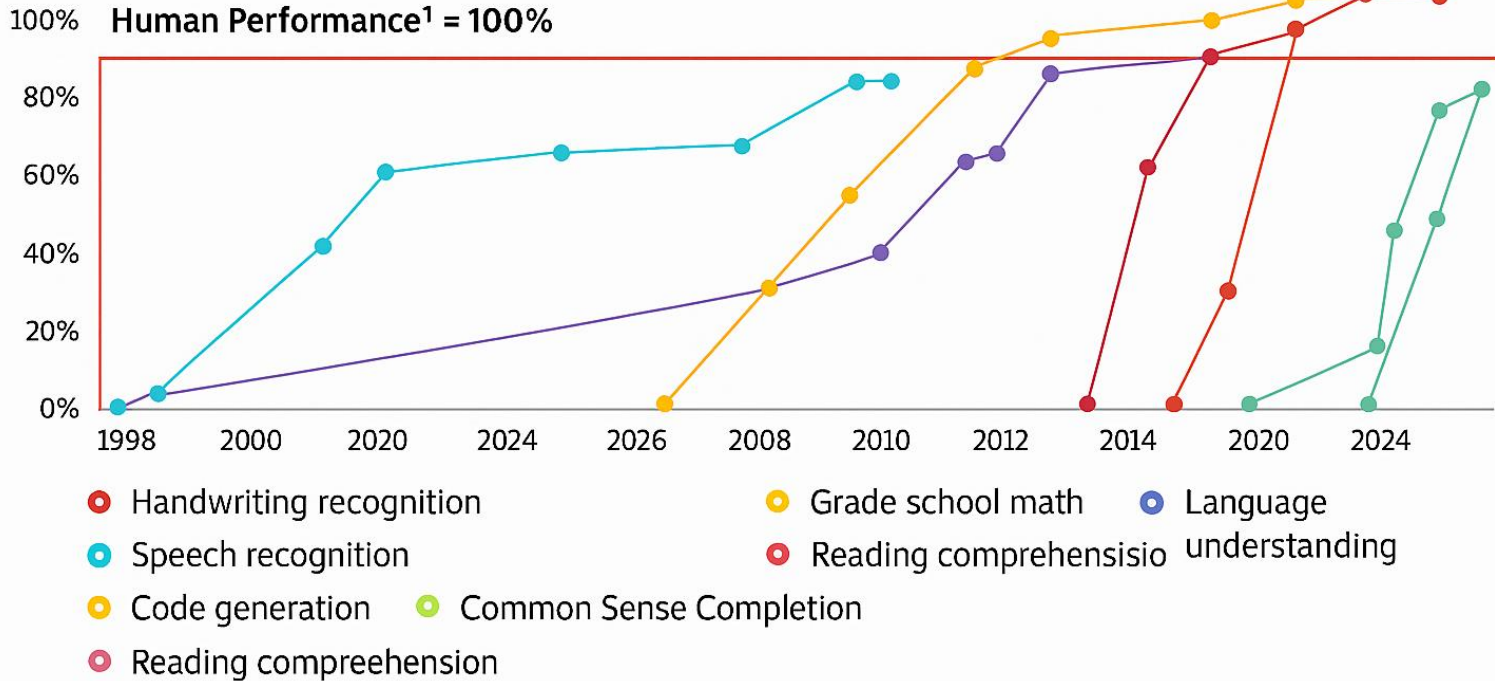
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UniCredit S.p.A.

Win. The Right Way.
Together.



State of the art AI surpassing human performance at increasing pace



»» Why GenAI matters now

75%

of executives rank

AI/GenAI as a top
three strategic
priority

25%

of executives are

seeing significant
value from AI

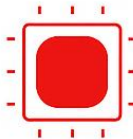


» Introducing Agentic AI: Systems That Can Use Tools



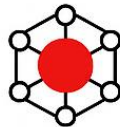
**The next
frontier in AI
is agents:
AI that has
learned to use
tools**

What an agent is



Memory

Remembering
across tasks
and changing
states



Systems

Accessing
external systems
on your behalf

What an agent does



Observes

Collect and
process data
from
environment



Acts

Execute by
leveraging
internal or
external tools/
systems



» Credit process today: a “human-centric” assembly line

- 1 Intake / application**
RM gathers emails, PDFs, statements, KYC into casefile
- 2 Data capture**
Analyst extracts and standardizes financials into complete statutory
- 3 Risk assessment & write-up**
Analyst drafts the credit memo (risks, mitigants, rating)
- 4 Decisioning**
Credit Committee largely decides off a static docu
- 5 Documentation & conditions**
Teams track covenants and signals manually
- 7 Monitoring / early warning**
Regulation: higher 'tax per loan



Linear 'waterfall chair'

A delay in step X stalls the entire assembly line and upstre, file effort is largely wasted



High unit cost driven by high variability

Industry/geographic differences ondoescabe structures create



Episodic

Teams spend dispropotionate time extracting|reconciling data













Regulation: higher 'tax per loan'

Higher expectations on documentation, traceability and evidence of repayment capacity



» Reimagining the process: from legacy to agentic

Dimension	Legacy model (As-is)	Agentic model (To-be)
 Process topology	1 Linear & sequential	4 Asynchronous & parallel
 Data substrate	 Document-centric	 Semantic & ontology-centric
 Monitoring model	 Episodic & reactive	 Case-based & continuous
 Decision & auditability	 After-the-fact	 Explicit & codified

HUMAN IN THE LOOP

HUMAN ON THE LOOP



» Reimagining the credit process: an E2E, agent-orchestrated 4 phases process



Origination with intelligent ingestion



Data capture



Risk assessment & decision pack drafting

1

Classify and cleanse

2

Automated financial normalization & raft

3

Draft decision memo

4

Decisioning & monitoring

- ❑ Agents coordinate tasks end-to-end, cutting latency between data decisioning and monitoring
- ❑ automated classification reduces rework and eliminates manual copy-paste errors
- ❑ Policy compliance by design
- ❑ Proactive risk posture: continuous monitoring & early-warning agents reopen the case before breaches, shifting from episodic to predictive reviews



AI in Credit: Strong Governance, High-Risk Controls and Continuous Oversight by Design




**AI ACT
CLASSIFICATION
& APPLICABILITY**




**MANDATORY
CONTROLS FOR
HIGH-RISK-
EQUIVALENT
SYSTEMS**




**GOVERNANCE
INTEGRATION**



**HUMAN
OVERSIGHT &
DECISION
ACCOUNTABILITY**



**TRACEABILITY,
LOGGING &
AUDIT TRAILS**



**CONTINUOUS
MONITORING &
POST-MARKET
SURVEILLANCE**

- Apply high-risk controls even for corporate: fewer surprises with supervisors later
- Keep a human in/on the loop: no fully automated outcomes
- Log everything (inputs, versions, checks, approvals) to ensure a complete, immutable audit trail
- Strengthen data governance: provenance, quality, representativeness
- Monitor continuously (post-market surveillance) to detect drift, bias, and performance drops
- Align with DORA for third-party and ICT resilience: contracts, audit rights, failover, exit strategy
- Make ownership explicit: clear roles across Risk, Compliance, Data/IT and the Model Validation function.



» Core Risk Areas Requiring Controls Under the AI Act



**DATA &
MODEL RISKS**



**AI ACT
NON-COMPLIANCE
& AUDITABILITY**



**AI CT
OPERATIONAL
RISKS**

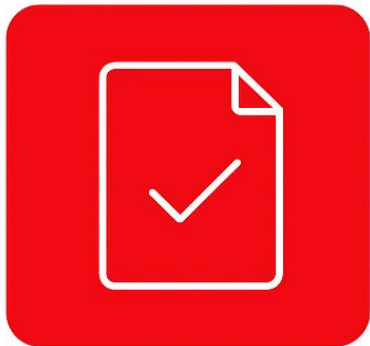


**ICT &
OPERATIONAL
RISKS**

- ❑ Hallucinations & reasoning errors: LLMs may generate unreliable financial analysis, incorrect conclusions or inconsistent scoring, leading to flawed decision-making
- ❑ AI Act non-compliance: Insufficient logging, inadequate risk-management practices, weak data-governance controls, or lack of human oversight
- ❑ Explainability limitations: Low interpretability in GenAI models makes it difficult to justify decisions in high-risk processes.
- ❑ Cyber vulnerabilities: AI components may introduce new attack surfaces (e.g., prompt injection, data poisoning) requiring strengthened ICT controls.



» Secure the Numbers: Data Integrity for Better Credit



DATA INTEGRITY

Impact on credit

- Unreliable financial metrics

Mitigation

- Improve data extraction and validation processes

Key risks

- Inaccurate or incomplete data
- Misinterpreted credit information (e.g. Cash flow, EBITDA, Covenants)



»» Why Fairness Matters in Credit Decisions



BIAS & FAIRNESS

Key risks

- Flawed or unrepresentative data
- Lending outcomes that reflect bias

Impact on credit

- Unfair treatment of borrowers

Mitigation

- Use diverse, high-quality datasets
- Conduct fair lending testing



» Explainability Risks and How They Impact Credit Quality



EXPLAINABILITY

Key risks

- Unclear reasoning behind model outputs
- Cannot reproduce outcomes for review

Impact on credit

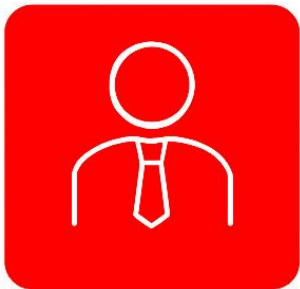
- Weak or unjustified decisions

Mitigation

- Use interpretable models
- Enforce human-in-the-loop review



»» When Analysts Over-Rely on AI: Risks and Controls



ANALYST OVER-RELIANCE

Key risks

- Analysts over relying on AI outputs
- Degradation of human judgment

Impact on credit

- Poor judgment in exceptional cases

Mitigation

- Require human challenge
- Provide training in critical thinking



» Resilience First: Outages, Limits and Cyber Threats



OPERATIONAL RESILIENCE

Key risks

- Reliance on external providers (outages, limits)
- Cyber threats
- data leakage, attacks

Impact on credit

- Disrupted credit processes

Mitigation

- Use interpretable models
- Establish backup systems



» Compliance by Design: Data, GDPR & Model Controls



REGULATORY COMPLIANCE

Key risks

- Incorrect extraction of compliance data
- Lack of safeguards for personal data

Key risks

- Validate extracted of compliance data
- Conduct detailed model

Impact on credit

- Regulatory findings or delays
- Inaccurate or non-compliant models
- Higher model validation workload

Mitigation

- Validate extracted data
- Implement GDPR controls

