

RAISE

Reportistica Antiriciclaggio Integrata e Sintesi Estrattiva

Integrated Anti-Money Laundering Reporting and Extractive Summarization

ECONDAT Knowledge Session 2 October 2025

Leveraging Retrieval-Augmented Generation for AML/CFT Compliance: The RAISE System

Daniele Licari

IT Development Directorate, Bank of Italy daniele.licari@bancaditalia.it

Key Points of the Presentation

- Background
- What is RAISE?
- Methodology
- Results
- Conclusions



Background:

AML Supervision and Regulation Unit

Supervisory Model

- Risk-based approach, guided by annual assessments
- Relies on AML/CFT reports and Risk Assessments sent by intermediaries

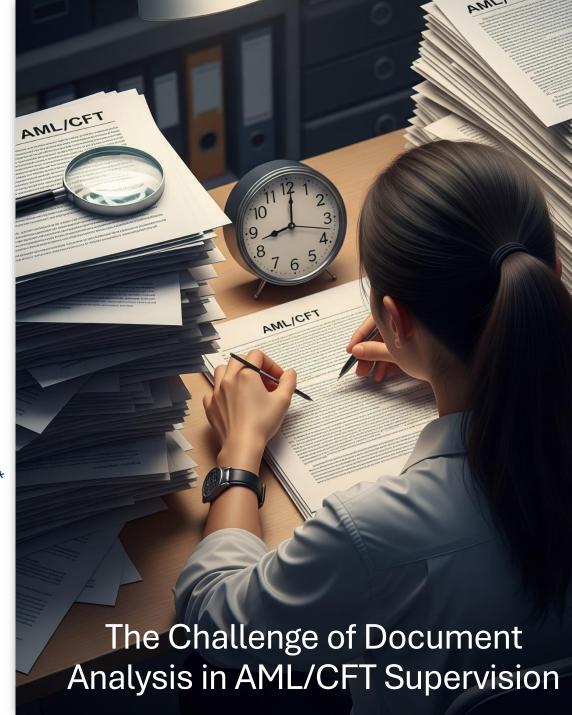
Current Challenges

- Submissions are unstructured and vary in detail
- Reviews are manual, complex, and resource-intensive
- >3 person-days per intermediary just for extraction & summarization*

Project scope

 120 documents from 87 intermediaries; test set: 20 intermediaries balanced across sectors

* based on internal analyses conducted on the reports and self-assessments from various categories of supervised intermediaries.



Attività Prevalente

What is RAISE?

RAISE (Reportistica Antiriciclaggio Integrata e Sintesi Estrattiva) is an Al-based system that supports the automatic analysis of AML/CFT reports, extracting relevant information from documents and generating structured summaries for each intermediary.

Objectives

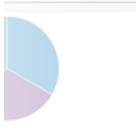
- Accelerate the analysis of documents during the annual review cycle
- Support analysts in producing draft summary reports
- Increase consistency of intermediary profiles
- Create structured datasets from unstructured texts



to dei propri cumpiti di controllo di Il fivello, garantita da procise dal 2019, che riporta granchicamente al Chief Compliance Officer del

ione Aziendale

togic e gli strumenti comuei. Le entità del Gruppo che openno con un ra con le liore guida di Gruppo e setto la supervisione finazionale della



one dei Rischi

Incremento Operazioni Dispositive

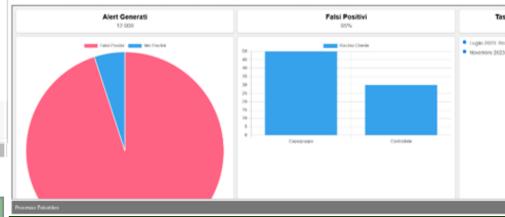
15%

Vulnerabilità del Sistema di Controllo

3 n.4

Relazione e Verifiche

Le principal certecté essers est processo di adequata vendica acchéence l'attenta instensi adequative di nomiteragno del manazioni, che opera sa regule statiche a generiche, instituado ai su oferette manazioni, che opera sa requie su del considera del procede del considera del manazioni del considera del cons



Governance e Procedure

La metodelagia di pincificazione firmatica percede su'instalio associa dei fabbicagni formativi bassa su cairi dell'autovolutazione, evoluzioni accessive, introduzione di marci produtti o processi, risultati dei controli i

Il Pinno Fernantero Autorica per della produccio di processi formativa per teneri di controli i

AFC ha pinnifero di civindere i grappermo di criticazione professionale e di collegare un programma di controli colorazione con di teneri con di civindere i grappermo di controli colorazione con di teneri con di civindere di colorazione con di teneri con di civindere di colorazione con di teneri con di civindere di colorazione con di teneri con di teneri con di civindere di colorazione con di teneri con di civindere di controli di controli con di civindere di controli di controli control

Undergate verifier della disordata i il prime aphaton mella preconsistene del vicologgio, comprendenta identificazione, verifica dell'identifi, acquisitione di inflormationi un'illustratione productione del productione del productione del vicologgio productione del vicologio productione del vi

La conservatione minima di 10 anni è garantita da procedure automatiche. La cressione periodica della clientela mintente è assente per clienti alto nischio, minusale per medio e quinquennale per basso nischio. Le catego attenti da nociclaggio e finanziamento del tenomismo accidente Polenciamente Exporte, cirenti non resolutat, società fidurante o trave, soggetto operanti za settori sensibile e strutture societario complesse.

Le rifer surson delle operations account e la recoverar a eventrale Sugmillarized di Operazione Securità representation di cover dell'attività antiriciclamito quotellama. Nel 2021, in Basca XYZ ha reflicante i propri processi sistente di monitori regione hausto a successi prodeficiale la le geovante di così i 2000 delle entirorità con i sense aggiunte regionitative e con informationi. Il treus declarate i territori in the regioni prodeficiale di cigori di verifiche. Le tipologie di anomalie riscontrare hausto riguardato operativisti con l'estro, withizo maproprio del contante e normanistationi non coverni col profilio. Nel corre del 2021, il Corppo XYZ ha transacture compile verifiche. Le tipologie di anomalie riscontrare hausto riguardato operativisti con l'estro, withizo materiale conditationi del contante de formati forma de materiale monitori manifer a returne del disperies con estaticationi che devoluto del formati della mentioni del frature files en filmazimi maniferationi con indicationi contrare della disperies con conditationi del contrare della mentioni della productioni del disperies con contrare della contrare della mentioni della contrare della mentioni della contrare della contrare della mentioni della contrare della

e Bases ha valuates e emplementates consologie mes egents per mispense e efficience de processa AML, come modelle de mander learning e model de metales handes comme e de la Consideration de returned de modelle de mander de la Consideration AML has revisto e a destante management de la Consideration AML consideration AML has revisto e a parte completem le asia chey de gruppo, effictuamede la consideration des fascociós PEP e demando formaciones specialesmos somo state entrodors una checkhos reflexanta de unbombing por efectua al de inschoo e un KPI de completación desses a consideration de la fascociós PEP e demando formaciones specialesmos somo state instruction unas checkhos reflexanta de unbombing por efectua al des inschoo e un KPI de completación desses a formación de la consideration de la



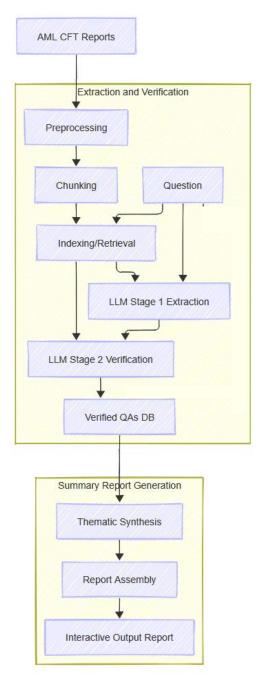


1. Extraction & Verification

 Preprocess documents → chunk text → retrieve relevant passages → LLM extracts answers → verification step → verified Q&As

2. Summary Report Generation

- Synthesize verified Q&As into structured sections: Activity, Organization, Risk, Controls, Governance
- Produce interactive HTML report with expandable answers and full source traceability



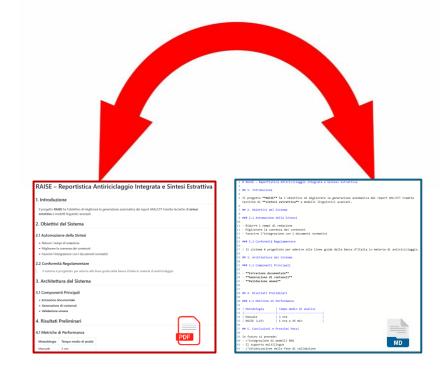
Data Preparation & Segmentation

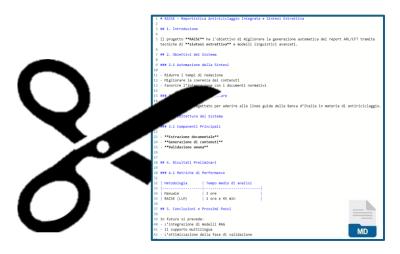
Document prep: PDF → Markdown, preserving titles, lists, tables

Hierarchical segmentation:

- Block segmentation: divide text by titles & paragraphs, preserving context
- Sentence segmentation: create smaller, cohesive units within chunk size constraint

Benefit: LLM can efficiently locate relevant "pieces" of the document, improving accuracy and extraction efficiency





Targeted Questions & Annotation

58 predefined questions across 5 AML/CFT areas: Activity, Organization, Risk, Controls, Governance. Designed by domain experts → ensures comprehensive, consistent coverage

Annotation:

- 28 analysts annotated 120 documents → 6,524 annotations (~3,000 Q&A pairs)
- Iterative workflow for consistency & quality control
- Representative examples selected for few-shot learning, optimizing LLM performance

Area	N. Questions
Main Business Activity Framing of the intermediary and business model.	7
Corporate Organization Structure of the AML function and the roles of corporate bodies	10
Risk Self-Assessment Internal process for assessing ML/TF (Money Laundering/Terrorist Financing) risk.	15
Reporting and Controls Activities carried out by the AML function and the controls performed.	9
Governance and Procedures AML management at the level of governance, processes, technological developments, and interactions with authorities.	17
Tot	58



AML CFT Reports Preprocessing Chunking Question Retrieval Retrieved chunks answer from LLM Stage 1 Extraction chunks Retrieved chunks answer Supported by LLM Stage 2 Verification context? Verified QAs DB

RAG & Verification Workflow

Extraction and Verification

- Hybrid retrieval*: BM25 + domain-tuned BGE-m embeddings (Reciprocal Rank Fusion)
- **LLM extraction:** Mistral Small 3.1**, guided by few-shot examples, extracts answers, links to sources → transparency & traceability
- Verification: LLM checks each answer is fully supported by retrieved context
- Segmentation & configuration: stateless, chunk size 1,024 tokens, 5 chunks per question
- Outcome: Verified Q&A set per intermediary, ready for structured report generation

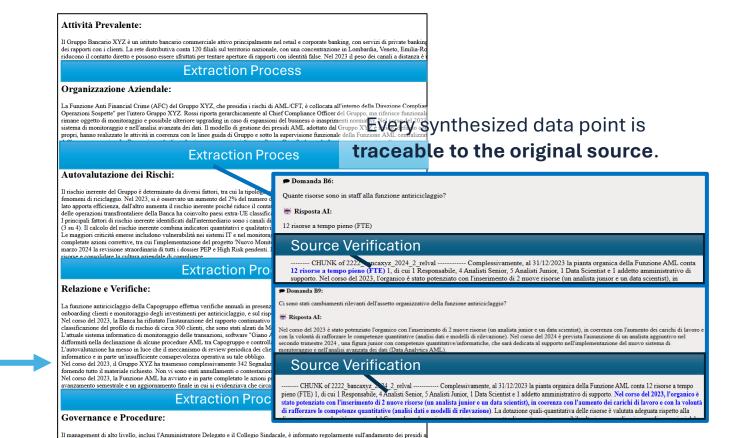
Question Chunkina Retrieval LLM Stage 1 Extraction LLM Stage 2 Verification Verified QAs DB Convert Q&A pairs into **structured** Thematic Synthesis **AML/CFT** report sections Report Assembly Interactive Output Report **Summary Report Workflow**

Summary Report Generation

• Input: Verified Q&A pairs, report topics

correttive in corso e si promuove il coordinamento tra funzioni, come la condivisione di casistiche di operazioni sospette e l'impatto di nuove

- Process: Synthesize into structured sections (Activity, Organization, Risk, Controls, Governance); generate interactive HTML report
- Interactive Sections: Expandable Q&A pairs per section



Results

Key experiment insights:

- Hybrid retrieval + fine-tuned embeddings improved NDCG@10 by 26% over BM25 and +15% over pretrained
- Segmentation critical for optimal LLM performance: Best configuration with Stateless, CS 1024, Top-5*

Qualitative**:

- ~80% of generated answers useful
- Hallucinations reduced from 3% → 0%
- New relevant information discovered

Summary Report Evaluation**:

- RAISE vs. Copilot Chat (May 2025)
- Criteria: readability, completeness, adherence to source data
- RAISE outperformed baseline in completeness & readability, with strong source fidelity

Retrieval Performance (NDCG@10)

	<u> </u>
Retrieval System	NDCG@10
Hybrid BM25 + bge-m3 (fine-tuned)	0.67
Hybrid BM25 + E5-small (fine-tuned)	0.64
bge-m3 (fine-tuned)	0.64
Hybrid BM25 + MiniLM (fine-tuned)	0.61
Hybrid BM25 + bge-m3 (pre-trained)	0.58
E5-small (fine-tuned)	0.60
MiniLM (fine-tuned)	0.57
bge-m3 (pre-trained)	0.55
BM25 (baseline)	0.53

Category	%	•
useful for analysts	79.8	Answer Quality Breakdown**
Truly Incorrect Answers	8.3	
False Negatives	11.9	_ : = :::::::::::::::::::::::::::::::::

RAISE vs. Copilot Report Evaluation**

Criterion	RAISE	COPILOT	ΔR-C
Readability	4.17	3.66	+0.51
Completeness	3.60	2.80	+0.80
Data Adherence	3.66	3.57	+0.09
Overall Score	3.81	3.34	+0.47

^{*} Tested configurations: Block vs Hierarchical segmentation; chunk sizes 1024, 2048, 3072; top-k retrieval 5, 10, 20; QA mode stateless vs stateful (20k token memory) evaluated with EM, ROUGE, BERTScore, and F1 on test set

^{**7} intermediaries were selected, each representing a specific type

Key Benefits and Constraints

- **Speed:** Reports completed in 15–20 minutes per intermediary
- **Time savings:** ~30% reduction in analysis time (≈400 person-days per cycle)*
- Coverage: Detects details not immediately obvious to analysts**
- Traceability & Security: Full on-premise operation, sources fully auditable
- **Constraints**: No real-time interaction, Input dependency, Annotation, Model constraints



^{*} Based on internal analyses conducted on the reports and self-assessments of the different categories of supervised intermediaries.

^{**} A qualitative analysis on 7 intermediaries showed an average increase of 16% (median) in information automatically extracted by RAISE compared to manually annotated data.

Conclusions

- Al can significantly improve the efficiency of AML/CFT document reviews.
- RAISE is a robust and transparent system developed entirely on-premise.
- Already delivered dozens of high-quality reports in 2025.
- Next steps: extension and full operational deployment in 2026.



Reportistica Antiriciclaggio Integrata e Sintesi Estrattiva

PoC Steering Group

Role	Name	Structure
IT lead	Daniele Licari	IT Development Directorate
Business lead	Valerio Minichiello	AML Supervision and Regulation Unit
Participant	Emanuela Atripaldi	Milan - Bank Oversight Division
Participant	Daniele Bovi	IT Development Service
Participant	Andrea Da Pieve	AML Supervision and Regulation Unit
Participant	Alessio Beninati	AML Supervision and Regulation Unit
Participant	Luca Trevisan	AML Supervision and Regulation Unit
Participant	Silvia Paoluzzi	AML Supervision and Regulation Unit
Participant 	Clara Puce	Milan - Asset Management And Investment Services Division