

Exercises: Lesson 7.2 – RegTech — Automating Compliance at Scale
Module 7: The Compliance Problem

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Exercise 1: False Positive Cost Analysis

A mid-sized bank's transaction monitoring system generates the following monthly statistics:

Metric	Value
Total alerts generated	45,000
False positive rate	96%
Average analyst time per alert	40 minutes
Fully loaded analyst cost	\$55 per hour
SARs filed (from true positives)	720

Tasks:

- Calculate the number of true positives and false positives per month.
- Calculate the total monthly cost of investigating all alerts.
- What percentage of total investigation cost is spent on false positives?
- An ML system reduces the false positive rate to 55% while maintaining the same 1,800 true positives. Calculate the new total alert volume and the monthly cost savings.
- If the ML system costs \$1.2 million per year to license and maintain, what is the annual net savings (or cost)?

Exercise 2: ML Model Threshold Tuning

An ML transaction monitoring model scores each transaction from 0 (not suspicious) to 1 (highly suspicious). The compliance team tests three score thresholds:

Threshold	Alerts Generated	True Positives Captured	False Positives
0.4	25,000	1,900	23,100
0.6	12,000	1,750	10,250
0.8	5,000	1,400	3,600

Tasks:

- a Calculate the precision (TP / total alerts) and false positive rate for each threshold.
- b If the bank's analysts can review at most 15,000 alerts per month, which threshold(s) are operationally feasible?
- c Calculate the "cost of missed true positives" for threshold 0.8 vs. 0.4, assuming each missed SAR has an expected regulatory penalty of \$50,000.
- d Recommend a threshold and justify your choice, balancing operational capacity, detection rate, and regulatory risk.
- e If the team uses a two-tier system (ML auto-clears scores below 0.4 and prioritizes scores above 0.8 for immediate review), what is the remaining middle-tier volume?

Exercise 3: Regulatory Reporting Error Analysis

A bank submits 120 regulatory reports per quarter. The table below shows error rates before and after implementing an XBRL-based automated reporting system:

Metric	Manual Process	XBRL Automated
Reports requiring restatement	12%	1.5%
Average restatement cost	\$18,000	\$4,000
Staff hours per report	45	8
Staff cost per hour	\$65	\$65
System license (per quarter)	—	\$95,000

Tasks:

- Calculate the quarterly restatement cost under each approach.
- Calculate the quarterly staff cost for report preparation under each approach.
- What is the total quarterly cost (staff + restatement + license) for each approach?
- Calculate the annual net savings from automation.
- Beyond cost savings, list two non-financial benefits of XBRL automation.

Exercise 4: Biometric Verification System Evaluation

A neobank is evaluating two identity verification vendors. Each vendor processes 50,000 onboarding attempts per month:

Metric	Vendor A	Vendor B
Document verification accuracy	98.5%	99.2%
Facial match accuracy	99.0%	98.5%
Liveness detection accuracy	97.0%	99.5%
Average verification time	45 seconds	90 seconds
Cost per verification	\$0.80	\$1.40
False rejection rate (legitimate users)	3.5%	1.8%

Tasks:

- Calculate the combined pass-through probability for a legitimate user under each vendor (multiply accuracies of all three stages).
- If each false rejection costs the neobank \$25 in customer acquisition loss, calculate the monthly false rejection cost for each vendor.
- Calculate the total monthly cost (verification fees + false rejection costs) for each vendor.
- Which vendor would you recommend? Consider cost, security (liveness accuracy), and user experience (speed).
- A deepfake attack targets 500 onboarding attempts per month. How many would each vendor's liveness detection catch?

Exercise 5: Differential Privacy Budget Allocation

A regulator asks a bank to report the average transaction amount per customer segment. The bank wants to use differential privacy to protect individual records.

Given:

- Number of customer segments: 4
- True average transaction amounts: Retail \$85, SME \$2,400, Corporate \$45,000, High-Net-Worth \$125,000
- Total privacy budget: $\epsilon = 2.0$
- Noise mechanism: Laplace noise with scale $b = \frac{\Delta f}{\epsilon}$
- Sensitivity Δf : the maximum change from adding/removing one record (assume \$500 for retail, \$5,000 for SME, \$100,000 for corporate, \$250,000 for HNW)

Tasks:

- If the bank splits the budget equally across 4 queries ($\epsilon_i = 0.5$ each), calculate the Laplace noise scale b for each segment.
- Calculate the expected noise as a percentage of the true average for each segment. Which segment has the worst signal-to-noise ratio?
- Suggest a non-uniform budget allocation that reduces noise for the most sensitive segment. Justify your allocation.

Exercise 6: Federated Learning vs. Centralized Training

A consortium of three banks considers two approaches to training a shared AML detection model:

Bank	Transactions/month	SARs filed/month	SAR rate
Bank A	12,000,000	3,600	0.030%
Bank B	3,000,000	1,200	0.040%
Bank C	800,000	480	0.060%

Tasks:

- If all data were pooled (centralized), calculate the combined SAR rate.
- In federated learning, each bank trains locally and sends gradients. If Bank C's local model achieves 85% recall (true positive rate) alone but the federated model achieves 92%, how many additional true SARs does Bank C detect per month?
- What privacy risk exists in centralized training that federated learning eliminates?
- Identify one weakness of federated learning when banks have very different transaction profiles.
- If Bank B leaves the consortium, estimate the impact on the federated model's ability to detect cross-bank layering schemes.

Exercise 7: RegTech Return on Investment

A bank is evaluating a RegTech platform that consolidates transaction monitoring, regulatory reporting, and KYC into a single system. Current and projected costs:

Cost Category	Current Annual	With RegTech
Compliance staff (FTE × salary)	\$8,500,000	\$4,200,000
Legacy system licenses	\$1,800,000	\$0
RegTech platform license	\$0	\$2,400,000
Implementation (Year 1 only)	\$0	\$1,500,000
Regulatory fines (3-year avg.)	\$3,200,000	\$800,000
Training and change management	\$0	\$350,000

Tasks:

- Calculate the total cost of ownership (TCO) for Year 1 under each scenario.
- Calculate the TCO for Years 2–3 (assume no implementation or training costs).
- Calculate the 3-year cumulative savings.
- Calculate the simple payback period (months until cumulative savings exceed cumulative implementation and transition costs).
- List two risks that could reduce the actual ROI below the projected figures.

Exercise 8: Secure MPC for Sanctions Screening

Two banks want to check whether any of their customers appear on the other bank's internal watchlist, without revealing their full customer lists.

Setup:

- Bank X has 2,000,000 customers
- Bank Y has 1,500,000 customers
- They use a Private Set Intersection (PSI) protocol (a form of secure MPC)
- PSI reveals only the intersection (common entries), not the non-matching records
- Computational cost: 0.002 seconds per comparison pair
- The naive approach compares every customer in X against every customer in Y

Tasks:

- a How many comparison pairs would the naive approach require? Estimate the total computation time.
- b A hash-based PSI optimization reduces comparisons to $O(n + m)$ rather than $O(n \times m)$. Calculate the new number of operations and computation time.
- c If the match rate is 0.05%, how many shared customers are expected?
- d What information does each bank learn from the PSI result? What information remains hidden?