

**Faculty of Law, Economics and
Finance** of the University of
Luxembourg

Artificial Intelligence and Systemic Risk
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LE GOUVERNEMENT
DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère des Affaires étrangères
et européennes

Zetsche/Arner/Buckley/Tang, Artificial Intelligence in
Finance: Putting the Human in the Loop,
<https://ssrn.com/abstract=3531711>

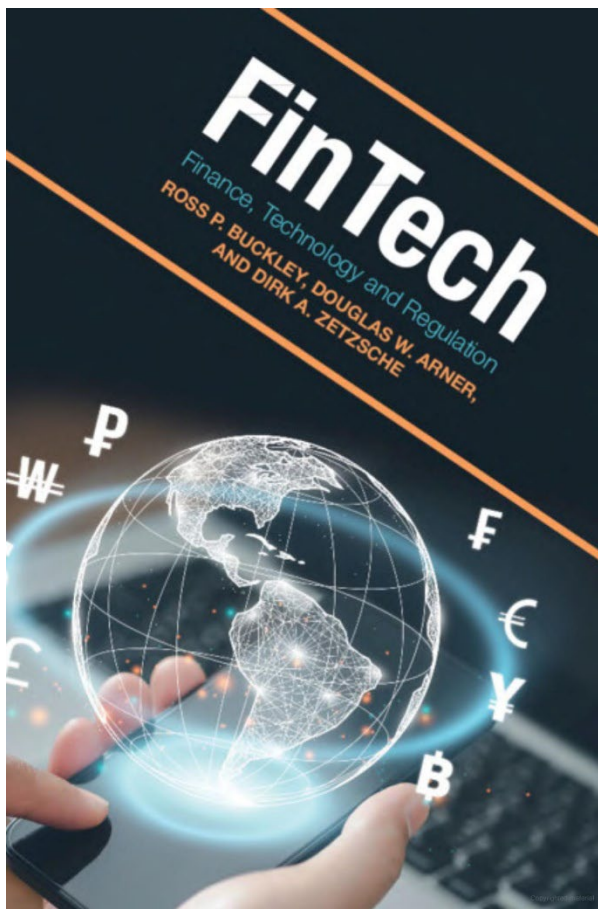
- AI risks = Big Data risks
- Capital misallocation: steering of cash-flows in suboptimal investments
- Concealed coordination of multiple actors' financial services activities
- Collusion of algorithms
- Size effects due to data plus liquidity control ("super-apps")

- AI approach: explainability, ultimate switch etc.
- FS approach: risk management, “Human in the loop”, fitness, properness, organization, liability
- Data approach: transparency on data use, open data, public data repository
- Antitrust / Competition Approach: Digital Data Act etc.
- Foreign Direct Investment approach: limiting acquisitions and conglomerate building by foreign actors

- AI does not matter as long as it is “too small too care”
- AI poses Systemic Risks once it is “too large to fail”
- The “super apps”
 - ⇒ Tipping point? Trigger factors?
 - ⇒ ESAs’ monitoring of size and dimension of AI- and data-driven activities
 - ⇒ DG Fisma inquires into mixed FS and data activities

MAG Study on behalf of EC is forthcoming 2024.

Thank you!



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