

## Regulatory/Supervisory Pills | N.92 June 2025



TOPICS: Technology

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Federal Office for Information Security - Germany

## Federal Office for Information Security - Germany: Test Criteria Catalogue for Al Systems in Finance

The Test Criteria Catalogue for AI Systems in Finance - prepared by the Federal Office for Information Security (BSI) - provides a structured framework for evaluating the trustworthiness, security, and compliance of AI systems used in the financial sector. Developed under the BSI's AICRIV Finance project, the catalogue aims to align AI applications with the EU AI Act while addressing sector-specific risks and regulatory expectations.

The catalogue introduces a **riskbased**, **holistic**, **and adaptable audit approach**, allowing both selfassessment and external audits. It employs an initial questionnaire to tailor the evaluation process based on system characteristics and risk profile, ensuring relevance across diverse financial use cases.

Ten dimensions form the backbone of the evaluation: AI Security & **Robustness** – Evaluates resilience attacks against (e.g., evasion. backdoor, model theft), robustness under corner cases, and handling of Al-specific incidents; IT Security – Covers classical IT safeguards like access controls, network protection, and supply chain security; Monitoring Focuses on ongoing performance tracking, anomaly detection, and incident response;

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Performance – Ensures functional correctness, efficiency, reliability, and resistance to overfitting; Governance Addresses organizational structures, AL policy reviews, competency management, and legal implications; Human **Oversight** Examines the presence and effectiveness of human-in-the-loop mechanisms; Fairness – Assesses bias, considerations. ethical and accessibility; Transparency Promotes explainability, user awareness, and documentation of AI Data Quality processes; & Management \_ Mandates high standards for data sourcing, integrity, consent management, and documentation; Development Stipulates comprehensive technical documentation, model selection transparency, and controlled deployment practices.

• Each criterion is clearly mapped to relevant EU AI Act articles particularly risk those on management, transparency, robustness, and quality management providing practical pathways towards regulatory compliance.

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