

Survey-Results Al & Compliance

Whitepaper
Dezember 2024



Foreword



Roman Sartor
Lead Survey Group and ENFCO Representative Austria

Dear Compliance Community,

this year, we once again conducted a Europewide study focusing on a pressing topic for the Compliance profession. Following previous years' themes – from the Compliance Function to Whistleblowing and ESG – this time, we turned our attention to a subject that is increasingly shaping and transforming our work: Artificial Intelligence (AI).

The choice of this topic was a natural response to current developments. The ongoing digitalization, and particularly the integration of AI technologies, offers immense potential — not least for Compliance departments themselves. At the same time, we are facing new risk areas and regulatory challenges, such as the upcoming AI Act by the European Union. Striking the right balance between fostering innovation and ensuring control will be a critical skill for Compliance professionals moving forward.

Our study provides comprehensive insights into this complex interplay, examining the current state of AI adoption and regulation across Europe. This is further enriched by an inspiring interview with Amnesty International, which sheds light on the intersection of human rights and AI. Especially in this domain, the responsible use of emerging technologies is paramount. The results of this year's study are reflecting not only the diversity of approaches but also the shared responsibility we hold. With this publication, we aim to support your work and provide fresh perspectives to help navigate this transformative era.



I would like to extend my heartfelt thanks to the members of the Survey Working Group, Andrea Pilecky, Jenny Schmigale, Kika Joncour, Andrijana Bergant and Patrick Wellens, for their dedication and invaluable contributions to this project. Their expertise and commitment have been instrumental in making this study a success.

A special thank you also goes to you — the European Compliance community. Your active participation in the survey, your engagement, and your ongoing cross-border exchange are the cornerstone of our work. It is only through this open dialogue that we can develop solutions together, learn from one another, and advance the Compliance function across Europe. Looking ahead, I am confident that we will continue to address exciting and important topics in the coming year. Until then, I wish you an inspiring read of this whitepaper and successful exchanges within and beyond your organizations.

Thank you for your trust and support and

STAY COMPLIANT!

Roman Sartor

Lead Survey Group and ENFCO Representative Austria Looking forward to next year's survey: "Corruption & Compliance" Stay tuned!

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About ENFCO

ENFCO (European Network for Compliance Officers) is a network of not-for-profit associations for in-house compliance professionals across Europe. The organization facilitates the cooperation and communication between the participating associations and their incorporated professionals in the best spirit of a European community, according to the network's mission goals.

As their members share similar challenges, ENFCO's mission is to:

- facilitate the cooperation and communication on compliance between the European compliance associations,
- promote and strengthen the professionalization and the occupational profile of compliance professionals, and
- help improve the economic and institutional environment.

European Network for Compliance Officers (ENFCO)

- provides access to compliance professionals in other European countries,
- shares knowledge and information by exchanging best practice, tools & templates,
- exchanges knowledge and information on (upcoming) compliance regulation from the EU and individual states,
- provides relevant member benefits to the members of the other associations (e.g. reduced entry to conferences), and
- promotes associations' events taking place in other countries.

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Humans and Al: The Impact on Human Rights

As part of the survey, we had the pleasure of interviewing representatives from Amnesty International. Amnesty International is a globally operating organization dedicated to advocating for human rights. The organization's commitment involves ensuring that these rights are upheld in an increasingly digital world. Given the growing use of AI, it is important to consider that it is not always apparent whether human rights are being considered and guaranteed. The interview with Aurélie and Hajira provided us with valuable insights into the opportunities and risks in this context.



Aurélie Tournan

Executive Director at Amnesty International Austria
Aurélie studied Business Administration at the Neoma Business
School in France. Before joining Amnesty International in 2020,
she worked for 15 years in the automotive industry, holding a
variety of senior positions in marketing, customer service and finance. She combines business expertise with a passion for social
impact, making her a versatile leader in both the business and
not-for-profit sectors.



Hajira Maryam

Media Manager at Amnesty International

Hajira is a graduate from the University of Oxford. Since 2022, she is working at Amnesty International's Technology and Human Rights Programme, primarily in the Algorithmic Accountability Lab (AAL). The AAL is a research facility dedicated to addressing the negative impacts of automation and artificial intelligence, particularly in the distribution of social welfare.



How does AI align with Amnesty International?

Aurélie: Al technologies pose significant risks to human rights, including privacy, non-discrimination, and freedom of expression. The digital world is not exempt from the obligation to respect everyone's human rights, and indeed the digital realm is not separate. It mirrors existing inequalities but has the potential to amplify and entrench real-world harms.

Most of us are familiar with data privacy issues due to intrusive collection and use of personal data by public actors and private companies. But the risks of AI are broader than only privacy. AI systems can make decisions in high-stakes settings that impact people's rights directly, such as in social protection distribution, financial services, hiring, military contexts and more.

These technologies are often branded as ,technical fixes' by governments and international institutions for structural issues such as poverty, gender inequality and discrimination. They use sensitive and often staggering amounts of data, which are fed into automated systems to decide whether individuals should receive housing benefits, healthcare and education, or to determine whether they are at risk of committing crimes. Yet instead of fixing societal problems, many AI systems have amplified racism and inequalities, perpetuating human rights harms and discrimination.

Could you share details about your activities and initiatives in this field?

Hajira: At Amnesty International, we have a specialized team called Amnesty Tech, which focuses on research, advocacy, campaigning, and media outreach concerning technology's impact on human rights. The team investigates how algorithmic amplification on Big Tech platforms—such as TikTok, Meta, Google, and X/Twitter—can perpetuate human rights abuses.

Can you provide a specific example of your work's impact?

Hajira: Last year, Amnesty's Children and Young People's Digital Rights Team published reports on the abuse of privacy rights on the TikTok platform, its addictive design and its role in exacerbating children's mental health problems. Our advocacy work, alongside the work of many other organizations, contributed significantly to the European Commission's decision to investigate TikTok over possible breaches of the Digital Service Act (DSA) regarding the protection of children and young people.

How do you respond to concerns that AI systems can perpetuate discrimination?

Aurélie: Due to predictive and analytical functionalities, Al is frequently used for categorization across diverse domains including algorithmically targeted advertising, law enforcement, migration administration, and social security eligibility testing.

In collaboration with a coalition of civil society groups led by European Digital Rights (EDRi), our colleagues in Brussels have worked tirelessly over the past two and a half years to ensure that the AI Act respects human rights. They successfully advocated for increased transparency requirements and the banning of certain technologies. It's a lengthy job, but we're sticking with it!

Hajira: We investigate cases of clear rights violations stemming from harmful AI systems. Together with our partners, the Algorithmic Accountability Lab has led work on AI in social protection systems in different countries. These algorithms use vast amounts of data to determine eligibility for social protections or determine who is at risk for committing fraud, often with little to no human intervention. It reduces people's complex financial and social reality to a few datapoints, pushing those affected into distress and engulfing them in bureaucratic appeals processes with no accountability in sight. In general, these automat-

ed systems are flourishing across the world, lacking transparency and aiding discrimination against people based on gender, age, racial background, migrant status and other factors.

What practical steps can be taken to ensure AI is fair and transparent?

Hajira: Private actors should immediately halt the deployment of Al-powered mass surveillance technologies that could detrimentally impact human rights. Companies developing Al products should conduct adequate human rights due diligence to identify and address potential harms throughout the supply chain and product lifecycle. All providers should proactively disclose information needed to assess human rights impacts.

For too long, companies have self-regulated through "ethics policies" that lack enforcement. The key is ensuring human rights-respecting binding and enforceable AI regulation with strong provisions for corporate transparency and accountability.

At a fundamental level, AI systems rely on a common set of processes such as data collection, data processing, model building, and pattern recognition. These different components constitute the sequential stages when developing an AI system and are called the ,AI lifecycle'. However, we believe that the lifecycle must start at the conceptualization stage, wherein the choice is made whether to develop an AI tool or not.

In Amnesty International's view, tools that are not compliant with human rights by design should never move beyond this stage.

Aurélie: Every company must have clear governance policies, especially when integrating new technologies like AI. While existing data science frameworks evaluate algorithmic models based on fairness and transparency, these frameworks are not always designed with human rights at the core, which is essential.

How do you perceive the rapid advancement of such technologies shifting power dynamics from governments to private entities?

Aurélie: The power dynamic has long shifted from governments to private entities but has accelerated with the rapid development of AI tools for two key reasons. First, by giving many new players access to technologies that until now have been reserved for very few governmental organizations, not least because of their cost. Second, because of the growing power of technology giants who control the development, deployment, and use of these technologies.

As AI systems become central to decision-making in finance, healthcare, and social services, private companies increasingly influence areas traditionally managed by public institutions. This shift highlights the need for stronger regulatory frameworks to ensure these technologies align with public interests and human rights standards.

From a geopolitical perspective, how do you view Europe's role in shaping global technology standards?

Hajira: The European Union has the most comprehensive AI regulation worldwide. But Europe's AI policies often overlook global power imbalances, neglecting the impact of AI systems on communities worldwide—especially those who are left out

"Many AI systems have amplified racism and inequalities, perpetuating human rights harms and discrimination"



of key discussions, like those surrounding the AI Act. AI companies have exploited outsourced workers in places like Kenya and Pakistan, highlighting the need for more inclusive, ethical standards.

Currently, a handful of powerful markets dominate AI development, with companies sometimes evading local regulations by exporting high-risk technologies to regions with weaker oversight. Amnesty's report, "Out of Control: Failing EU Laws for Digital Surveillance Export," found that European companies had sold surveillance tools to support China's mass surveillance, putting vulnerable groups at risk. To address these gaps, the EU must adopt a consistent approach, applying the same human rights protections to exported AI as to systems within its borders—particularly for high-risk uses like policing, migration, and welfare. Establishing universal safeguards, rather than allowing regulatory loopholes, is essential as global AI regulations evolve.

When AI systems cause harm, who should take responsibility?

Hajira: The primary responsibility lies with those who develop and deploy these technologies. Evaluations of potential human rights harms must be conducted at the conceptualization stage. If a tool violates human rights standards, it should not advance to the next stage.

The AI lifecycle shows that flaws in early stages, like biased data collection, lead to harmful outcomes during model training and deployment. For instance, facial recognition technology often misidentifies people of color, especially women, due to biased training data, and is inherently problematic due to its mass surveillance nature. Additionally, studies reveal that data used in AI systems embeds racist, misogynistic, and stereotypical tags, which carry discriminatory biases into AI models.

Do you think ethical guidelines or legal frameworks are sufficient to regulate Al's influence on

"For too long, companies have self-regulated through "ethics policies" that lack enforcement,

human rights?

Hajira: No, they are not sufficient. Ethical guidelines often lack enforcement mechanisms and rely too heavily on corporate self-regulation.

What we need are binding, enforceable legal frameworks that place human rights at their core. These frameworks must include clear accountability mechanisms and provide meaningful remedies when violations occur.

What role should companies play in addressing Al-related challenges?

Aurélie: Companies must take a proactive role in mitigating risks by embedding human rights due diligence. This includes implementing transparency, accountability, and fairness into AI design and conducting impact assessments to identify potential harms, especially those affecting marginalized communities. It is far from easy, but we must do it — not only for reputational, financial, or legal reasons, but because as investors, leaders, and managers, we are also parents and friends, and we make decisions that impact the lives of each and every one of us.

How can the compliance community ensure responsible AI use?

Aurélie: Everyone can take action to help move things in the right direction. The compliance community can do so by establishing clear regulatory frameworks that focus on human rights, conducting regular impact assessments, and implementing continuous monitoring and auditing of AI systems. Ensuring transparency and fostering accountability within organizations are key steps to prevent biases and protect individual rights. Collaboration with external stakeholders and third-party auditors will also help uphold these standards and keep companies accountable to the broader public.

What are the biggest documented human rights challenges posed by AI?

Aurélie: The biggest documented human rights challenges posed by AI are discriminatory outcomes and unlawful mass surveillance, both of which are often embedded within AI systems due to their data-driven nature and reliance on biased datasets. These issues particularly impact marginalized communities, where AI is frequently tested and deployed. However, AI's risks are broader, encompassing concerns like opaque decision-making, automated judgments, and insufficient exercise of human judgment. Overcoming these obstacles requires two key strategies. First, Al deployment must be context-specific, with careful consideration of who defines the problems AI aims to address. Second, AI must be understood within its broader social, environmental, and political context, as it often amplifies pre-existing inequalities.

How can AI be used positively to advance human rights?

Hajira: Al can be valuable in human rights research, but we must conduct thorough critical assessments

"The primary responsibility lies with those who develop and deploy these technologies" of whether these tools do more harm than good. In some cases, AI has the potential for aiding human rights research. For instance, we have used AI tools to investigate large-scale analysis of satellite data to detect the destruction of human settlements.

Where AI can advance human rights, this must be driven and informed by impacted communities' voices and never at the expense of marginalized groups. While there are benefits and opportunities of AI, it is advancing rapidly without adequate safeguards, and it is essential that we do not adopt the tech industry's narrative of innovation at any cost.

Organizations must work to outline clear prohibitions and ensure that any benefits of AI technology don't come at the expense of human rights protections. The key is striking a balance between innovation and protection, ensuring that technological advancement serves rather than harms human rights and dignity. Most importantly, we must ensure that the development and deployment of AI systems are guided by human rights principles and meaningful accountability mechanisms, rather than purely by technological capability or commercial interests.

Your Donation Fuels Human Rights Change

If you would like to support the important work of Amnesty International, please consider making a donation by <u>clicking here</u> or by scanning the QR code below.







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Overview Key Findings

over 80 % confirm:

Al is already being used in their companies



2/3 agree

that companies need to figure out their possible uses of AI in order to remain competitive



the majority of respondents see the compliance function as the main point of responsibility

66% reported that they have not received training for the compliant use of Al





Method of the Survey

Artificial Intelligence (AI) is a term that is increasingly present nowadays and is frequently on the agenda of the Compliance Community. The aim of the 2024 survey was to get an overview of how AI influences compliance functions and how it is treated within compliance.

Survey period: Sep 13th - Oct 21st 2024

Sample: n=454

The Respondents

454 people took part in the survey.

- ⇒ 52 % of respondents were female, 47 % male and 1 % diverse.
- ⇒ 66 % of the participants were between 36 and 55 years old.
- ⇒ 78 % work in a compliance function, 16 % in a legal function.

The distribution of responses varies across company sizes, with larger companies (over 8.000 employees) and smaller companies (fewer than 50 employees) representing a larger share compared to mid-sized companies.

The survey was transmitted by the ENFCO members / local Compliance associations, namely AICOM (Italy), ASCO (Greece), ASCOM (Spain), BCM (Germany), Compliance Institute (Ireland), Compliance Pro Register (Belgium), Cumplen (Spain), ECS (Switzerland), EICE (Slovenia), GACO (Gibraltar), Le Cercle de la Compliance (France), ÖCOV (Austria), SCC (Slovakia) and VCO (Netherlands).

The Survey

The survey consisted of the following parts:

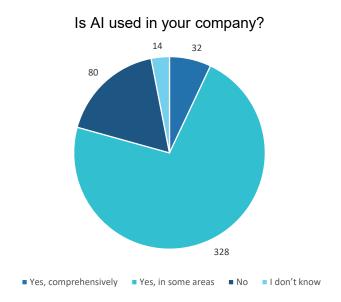
- 1. Al Definition & Framework Conditions
- 2. Benefits & Challenges
- 3. Responsibilities & Organization
- 4. Areas of Application of Al
- 5. Implementation Status of AI in Compliance
- 6. Future Prospects
- 7. Demographic Data

Definition & Framework

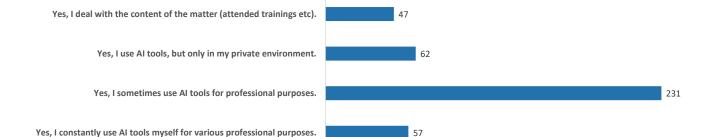
"Al is no longer the Future – It's the Present." The results shows that Al is already integrated to some extent in most companies. Over 63% of respondents report using Al either regularly or occasionally for professional purposes, while another 13% use Al tools, but only for personal purposes.

What it is about

Al refers to engineered systems that generate outputs such as content, forecasts, recommendations, or decisions for a given set of human-defined objectives. Its use has become increasingly prevalent, over the past few years. Whether in professional or private settings, the survey results show a clear trend, with a significant majority already engaging with Al regularly or occasionally. Almost 80% of the respondents indicated that Al is used in some capacity within their companies, highlighting its rising importance in the workplace. Another two-thirds stated that they personally use Al for professional purposes.



No, I have no point of contact. No any contact with AI?

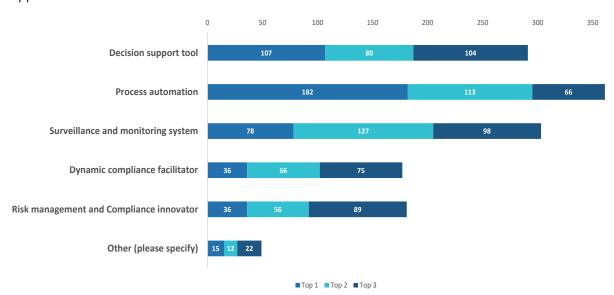




Top 3 Definitions of AI in the Context of Compliance

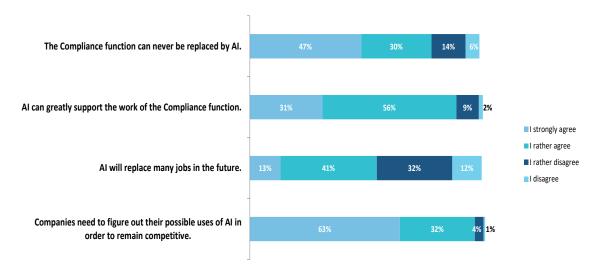
According to the respondents, Al in the context of compliance is particularly associated with process automation, decision support tools and surveillance and monitoring systems. Additionally, based on the comments from the ,Other' selection, further use cases were specified, including drafting policy and training content, document simplification and translation, and guideline and law reviews."

A country comparison shows that Austria, France, Germany, Greece, Italy, Slovakia, Switzerland, and Gibraltar rank Process Automation as the top use case, while the Netherlands, Spain, and Slovenia prioritize Decision Support.



AI in the Context of Compliance

The majority strongly agree that AI is crucial for a company's competitiveness, with over 80% of respondents either strongly or rather agreeing that AI can significantly support the compliance function. Particularly in the DACH region, a significant number of respondents "strongly agree" that companies need to identify potential AI use cases to remain competitive.



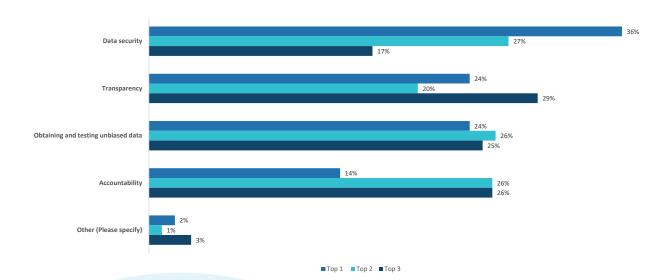
Benefits & Challenges

The survey highlights key benefits and challenges associated with the implementation of AI. Data security is identified as the leading challenge, followed by transparency and accountability, which are also seen as crucial areas for ensuring trustworthy AI systems. Concerns around data privacy, AI hallucination, and the complexities of regulatory compliance are noted as the primary risks linked to AI usage.

On the benefits side, respondents generally see AI as highly advantageous for improving productivity, especially for routine tasks. A significant portion of respondents also recognize AI's potential to contribute to cost reduction and enhance knowledge management within organizations.

Top 3 Bottlenecks in Implementing trustworthy AI Principles

Respondents were asked to rank the main bottlenecks in implementing trustworthy AI principles. **Data security** emerged as the **top bottleneck**, with **36%** of respondents selecting it as their primary concern. **Transparency** follows closely, with **24%** highlighting the need for AI systems to provide clear insights into decision-making processes. **Accountability** is another critical bottleneck, also with **24%** of respondents emphasizing the importance of establishing clear accountability mechanisms to ensure that AI decisions can be attributed and justified within the organization. Respondents specified data accuracy and reliability, as well as provider governance, in the comments. Comparing the answers by country, it stands out that **Austria** ranks **Transparency** as the biggest issue, while **Germany** and **Switzerland** rank **Data Security** as their top priority.

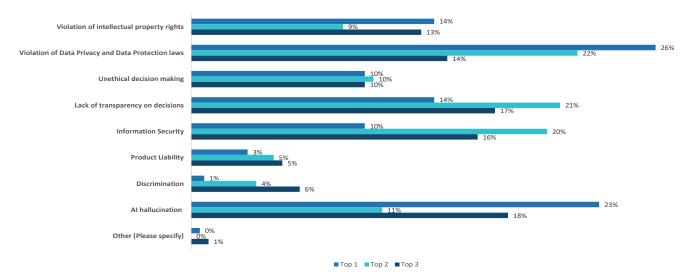


Data security and transparency are the top challenges in implementing AI systems



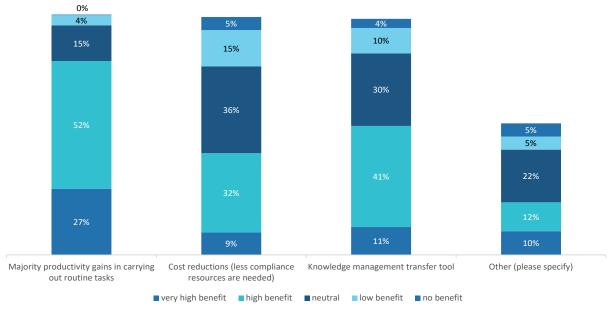
Biggest Risk Fields for Al Usage

The survey highlights the key risk fields companies face when implementing AI across business functions. The greatest concern, with almost 27% of respondents ranking it as the top risk, is the violation of data privacy and data protection laws, underscoring the importance of ensuring compliance with regulations governing sensitive data. Following closely, 23% of respondents identified AI hallucination as a critical risk, which refers to AI generating incorrect information that could lead to poor business decisions or external claims for damages. Other notable risks include violation of intellectual property rights and a lack of transparency in AI decision-making processes both with almost 14%. Comparing countries, Germany and Spain rank violation of data privacy and protection laws as the biggest risk, while Austria, France, Greece, and Switzerland highlight AI hallucination as the top risk.



The Benefits of AI for the Compliance Department

All countries "rather agree" that AI can support the compliance function, with this estimation being the top selection across the range. Almost 80% estimating either a "very high" or "high" benefit from AI in improving productivity for routine tasks. For cost reductions, 42% of respondents perceive a benefit. In terms of knowledge management, 53% view AI as either very beneficial or highly beneficial. The "Other" comments highlighted improvements in data handling and analysis, increased speed, and enhanced support for research.



Responsibilities & Organization

Compliance should be at the forefront of responsibility when it comes to overseeing Al in compliance operations according to the majority of respondents. Nearly 25% advocate for a cross-functional Al committee to take charge, while another 13% suggest the creation of a dedicated function exclusively responsible for Al.

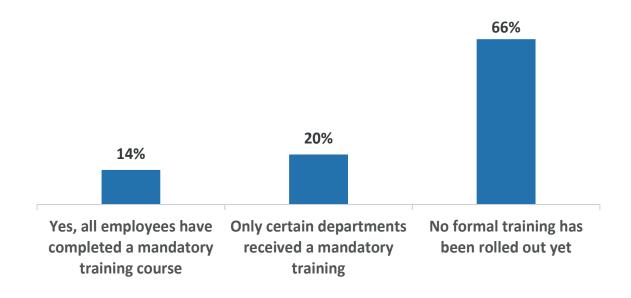
A similar result was observed for compliance training sessions on the **ethical use of AI**, with two-thirds of respondents believing that **compliance should be responsible** for conducting such training.

When it comes to governance models for AI, the results show a lack of consensus on a clear, unified direction. However, **compliance remains one of the leading areas of responsibility**, underscoring its importance in managing AI's integration and ensuring ethical and legal adherence across organizations.

The compliant use of Al

66% report that they have not received training on the compliant use of AI. However, there is broad consensus that the compliance department should be responsible for providing such training.

A significant challenge is the lack of technology expertise among compliance employees, which poses a barrier to AI adoption in the compliance department.



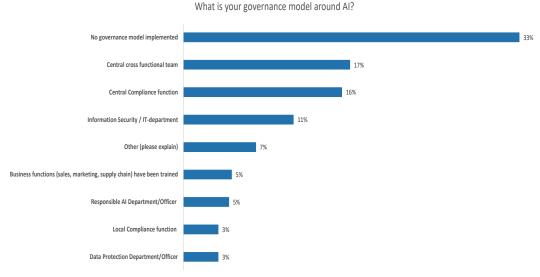


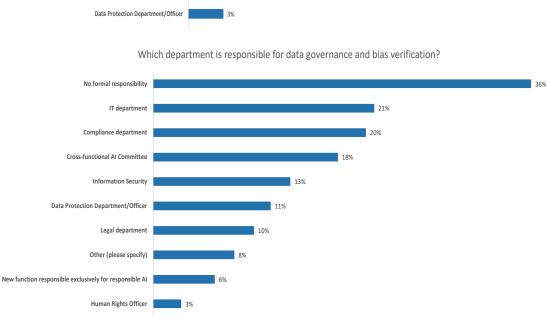
Governance around Al

According to the results on governance, it becomes apparent that organizations are still in the process of establishing formal governance structures for Al. A considerable 33% of respondents indicated the lack of a formal governance model. Among those with established governance structures, the most common approach involves central compliance functions. Nearly 16% of respondents said that a central compliance team approves Al projects, while around 17% reported that a central cross-functional team is responsible for approval.

When it comes to data governance and the verification of bias in Aldata, a similar lack of formal responsibility is evident. The largest portion of respondents (36%) reported that no specific department is formally responsible for reviewing data for bias. However, departments such as IT with almost 22% and compliance with 21% are most frequently tasked with this responsibility. Cross-functional Alcommittees are also seen as important in ensuring unbiased data with 18%.

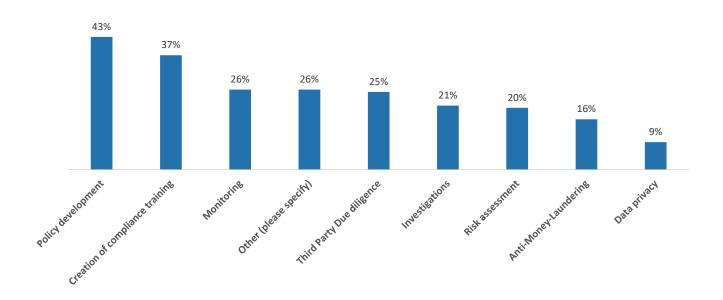
While other departments, such as information security, legal, and data protection officers, play roles in data governance, their involvement tends to be more limited. These findings suggest that while there is growing awareness of the need for AI governance, organizations are still in the process of implementing consistent and formalized structures for both governance and bias verification.





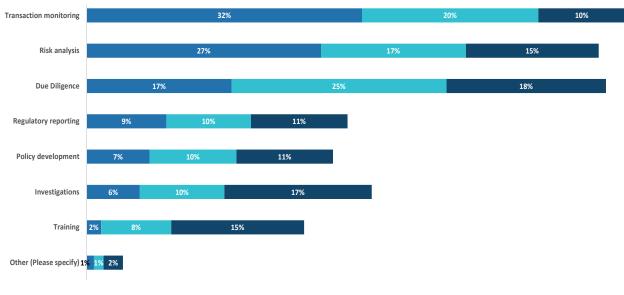
Areas of Application of Al

37% of respondents report that AI is currently being used in their compliance departments. Respondents who indicated that AI is already being used in their compliance departments ranked **creation of policies and training materials** as the primary use cases.



Greatest Potential for AI Application

Transaction monitoring and risk analysis are seen as areas with the greatest potential for AI application in compliance across the countries. While these areas are generally the top priorities, the results show different rankings within the DACH region, Germany ranks transaction monitoring as the greatest potential for AI in compliance, while Austria and Switzerland prioritize risk analysis. However, more than 80% of respondents reported that their current budgets for AI initiatives are limited to €50,000 or less.



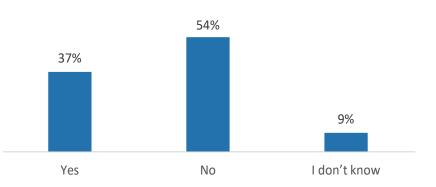


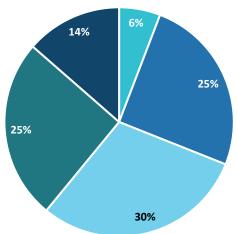
Implementation Status of Al

Organizational Implementation Preparedness

Over **50%** of respondents indicated that AI is not currently used in their compliance departments. However, more than **76%** are in pilot or research phases.

Austria appears more confident in its companies' AI preparedness, being the only country with more "very prepared" and "somewhat prepared" ratings, while other countries have the highest ratings in the "neutral" category.





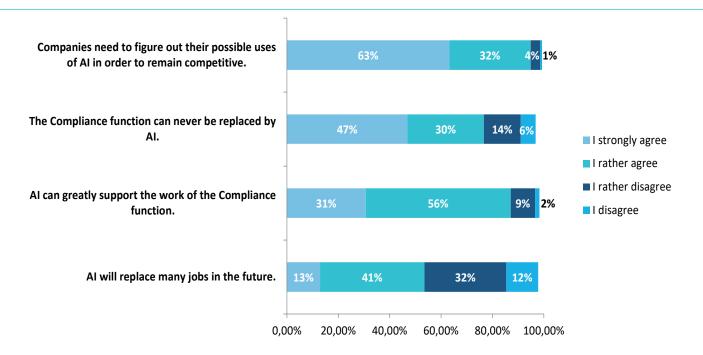
■ Very prepared ■ Somewhat prepared ■ Neutral ■ Slightly prepared ■ Not prepared at all

At what stage is your organization in the implementation of AI solutions for compliance?	
Pilot development: Engaged in creating and testing prototype Al solutions for compliance.	42%
Research: Currently exploring AI possibilities and their implications for compliance.	35%
Active implementation: In the process of integrating Al solutions into everyday compliance operations.	22%
Full operation: Al solutions are fully deployed and are a standard part of the compliance function.	1,5%

Future Perspectives

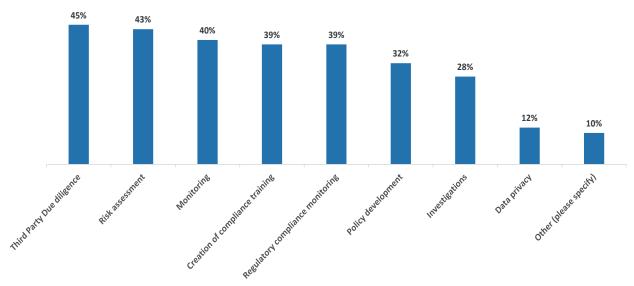
Most respondents agree that companies must identify potential AI use cases to stay competitive. Over the next three years, AI adoption in compliance is expected to focus on areas such as Third-Party Due Diligence (45%), Risk Assessment (43%), Monitoring (40%), and Compliance Training (39%).

78% believe that the total staffing level will not change, with 14% forecasting a reduction and 8% an increase in staffing due to Al's expanded capabilities.



Top 3 Use Cases for the next 3 Years

Third-Party Due Diligence, Risk Assessment, Monitoring and Compliance Training are expected to be the top compliance use cases over the next three years. "Other" contained various types of analysis, chatbots, but also uncertainty due to the early stage.



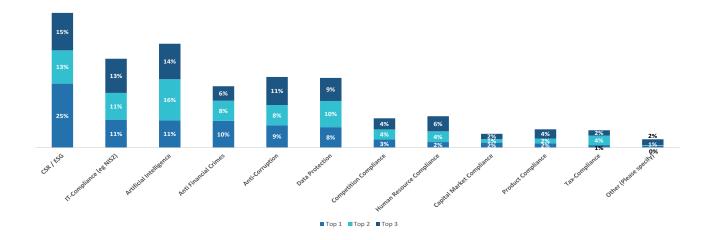


Main Challenges for Compliance in the Next 3 Years

The survey highlights key compliance areas that are expected to present challenges in the next three years. CSR/ESG (Corporate Social Responsibility/Environmental, Social, and Governance) is seen as the top challenge, with 25% of respondents ranking it as a primary challenge. IT Compliance, including regulations like NIS2, follows with almost 11%, while AI and Anti Financial Crime are also significant issues. Anti Corruption and Data Protection, are also viewed as critical, with 8% identifying them as top concerns. The "Other" category was chosen by a small portion, pointing to additional challenges not covered in the options. The comments included industry and market specific topics, as well as trade compliance and sanctions.

In terms of country comparison, it becomes evident that the DACH region views CSR/ESG as the main compliance challenge over the next three years, while Spain considers AI the biggest challenge, and Greece ranks Anti-Financial Crime as the top priority.

These results show that organizations will need to address a wide range of evolving compliance issues, especially in sustainability, technology, financial integrity and data protection.





The ENFCO Survey Group was comprised of Roman Sartor, Andrea Pilecky, Jenny Schmigale, Kika Joncour, Andrijana Bergant, and Patrick Wellens.

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