SWISSCOMPLY

Regulatory Update

Topic	**FINMA-Guidance 02/2026 (Digital fraud risks)**
Content	FINMA has noticed a significant increase in digital fraud cases at banks since 2022. Technological developments such as artificial intelligence, automation and instant payments further exacerbate these risks and increase the complexity of fraud scenarios. According to the FINMA-Guidance, banks and other supervised institutions must implement comprehensive, institution-wide risk management that identifies, assesses, controls and monitors digital fraud risks. FINMA emphasises in particular the importance of operational resilience and internal control systems. Digital fraud risks are closely related to money laundering and due diligence obligations. Institutions must ensure that their processes (e.g. KYC, transaction monitoring) remain effective against new forms of fraud and are further developed accordingly.
Source	FINMA Guidance | FINMA
Entry into force	FINMA published the Guidance 02/2026 on 9 April 2026. As is customary with FINMA-Guidances, this is an immediately effective clarification of expectations without a separate enactment decision.
Types of institutions affected	The Guidance is primarily aimed at banks and persons pursuant to Art. 1b BankG (FinTech licence). This means that the group of addressees is deliberately narrower than in general FINMA communications on operational risks – the focus is on institutions with digital retail banking offerings, online account opening and payment transaction services. In addition to direct addressing, the findings are also likely to serve as a guide for other FINMA licence holders with digital client access (e.g. securities firms, asset managers).
Legal reference	FINMA-Guidance 02/2026
Need for action	Banks and other supervised institutions must implement comprehensive, institution-wide risk management that identifies, assesses, controls and monitors digital fraud risks.
Implementation deadline	Immediately

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