Globant

The Agentic Banking Paradigm

Reinventing retail finance and navigating the third-party AI economy.



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EXECUTIVE SUMMARY

The next paradigm does not iterate on the model. It replaces it.

Retail banking is at an inflection point beyond the incremental gains of the past decade. The digital wave that moved branch workflows onto mobile interfaces has reached its ceiling. Modern banking apps, with hundreds of features in static menus, are now cognitive burdens rather than competitive advantages.

The **Agentic Era** is defined by autonomous AI systems that execute complex financial tasks on behalf of users: proactively, continuously, and without constant human instruction. Rather than opening an app to initiate a payment or apply for a loan, a customer delegates intent to a **Financial Life OS**, a persistent AI orchestrator that understands their objectives, coordinates specialist sub-agents, and acts within customer-defined mandates and regulatory guardrails.

"The agentic era is unfolding right now across financial services and every other industry, and enterprises that move with conviction will define it for the next decade. AI agents, supervised by humans and specialized by industry, are no longer a competitive advantage; they are the new foundation of how business gets done."

Martin Migoya
CEO & Co-founder, Globant



The threat is not only internal

A new competitive dynamic is emerging: third-party personal AI agents, embedded in operating systems, browsers, and chat platforms, will increasingly interact with banking infrastructure on behalf of consumers, bypassing the bank's own interface entirely. Institutions that do not build their own orchestration layer risk being reduced to commoditized capital utilities, invisible behind platforms they do not control.

This report provides a foundational blueprint: the strategic postures available to banks, the technical architecture required to execute them, the operating model for a hybrid human-and-agent workforce, and the compliance frameworks governing autonomous financial action.

TWO REQUIREMENTS THE GCC CANNOT OVERLOOK

Sovereign cloud architecture

Compliant with CBUAE data-residency rules and the UAE PDPL, with all models, vector stores, and audit logs inside national borders.

Sharia-compliant execution

Islamic-finance sequences such as Murabaha enforced through deterministic state machines rather than probabilistic model outputs.

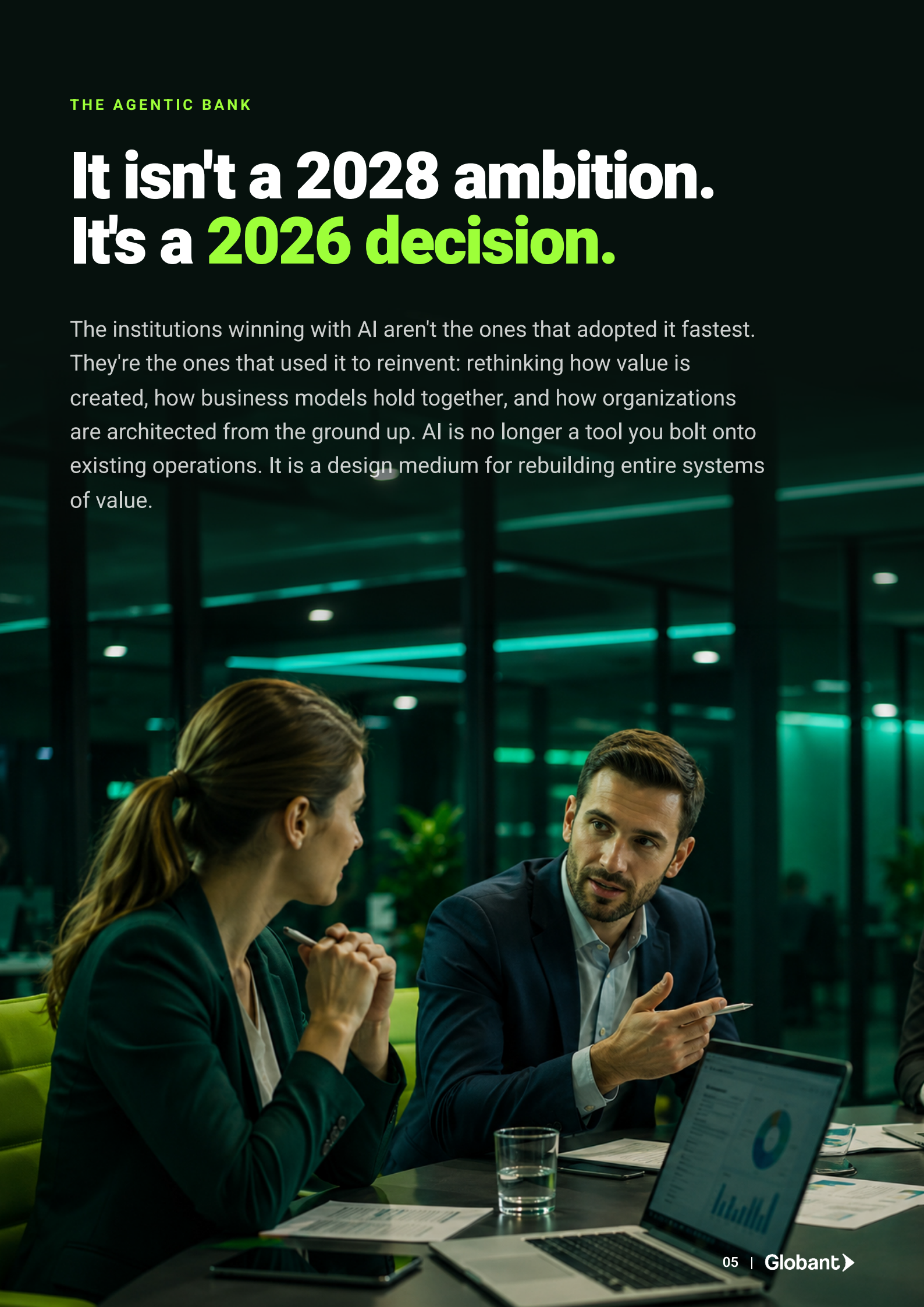
The GCC is not a late adopter of this shift. It is arguably **ahead** of it. The UAE's Open Finance Regulation and Saudi Arabia's move of open banking into a full licensing regime have already built the standardised, consent-governed data rails that agentic execution depends on. Most markets are still legislating what the Gulf has already deployed. The regional question is not whether the rails exist, but who controls the orchestration layer that runs on top of them.

THE BOTTOM LINE

Institutions that become the trusted orchestration layer will define the next generation of customer relationships. Those that do not risk becoming interchangeable providers of capital.

It isn't a 2028 ambition. It's a 2026 decision.

The institutions winning with AI aren't the ones that adopted it fastest. They're the ones that used it to reinvent: rethinking how value is created, how business models hold together, and how organizations are architected from the ground up. AI is no longer a tool you bolt onto existing operations. It is a design medium for rebuilding entire systems of value.



What defines an AI agent

An AI agent is an autonomous software system that **perceives its environment, reasons toward a goal, and takes action**, without step-by-step human instruction. Unlike a chatbot that responds and stops, an agent persists: it plans, executes, evaluates, and adapts until the objective is met.

01 Autonomy

It acts without step-by-step human instruction, operating within a customer-defined mandate.

02 Tool use

It interfaces with external systems, APIs, databases, and payment rails, to read data and execute actions in the real world.

03 Reasoning & adaptation

It evaluates the outcome of each action and adjusts its plan dynamically, rather than following a fixed script.



The region's leaders are no longer running pilots

Across the 25 MEA banks benchmarked by the Evident AI Index (June 2026),[10] established leaders are directing investment toward high-friction processes where AI materially reshapes productivity, scalability, and competitiveness.

50%

Cross-border payment automation at **First Abu Dhabi Bank**, with 75% workflow acceleration.

+30%

Increase in revenue per relationship manager driven by AI advisors at FAB.

2 vs 8

Average AI use cases in production: MEA banks today versus global banking peers.

The regional signal isn't confined to one market. Saudi Arabia's SAMA has licensed **32 payment service providers**, and digital payments now account for **~79%** of retail transactions, a leapfrog trajectory that mirrors Dubai's own 90%-by-2026 cashless mandate.[15] The GCC isn't adopting agentic-ready payment rails market by market; it's converging on them simultaneously.[22]

In APAC, **18%**[11] of bank executives report their organizations are using generative AI in production (Moody's with Asian Banking & Finance), a decisive inflection from experimentation to scaled value.

10. Evident AI Index, Banks MEA: Key Findings Report, June 2026.
11. Moody's, in collaboration with Asian Banking & Finance, 2026.
15. Dubai cashless-transactions target (90%+ digital by 2026).
22. Draup GCC BFSI Intelligence report, Saudi Arabia, July 2026.

KEY FINDINGS

Three signals every bank should read now

50% Agentic banking is the horizon

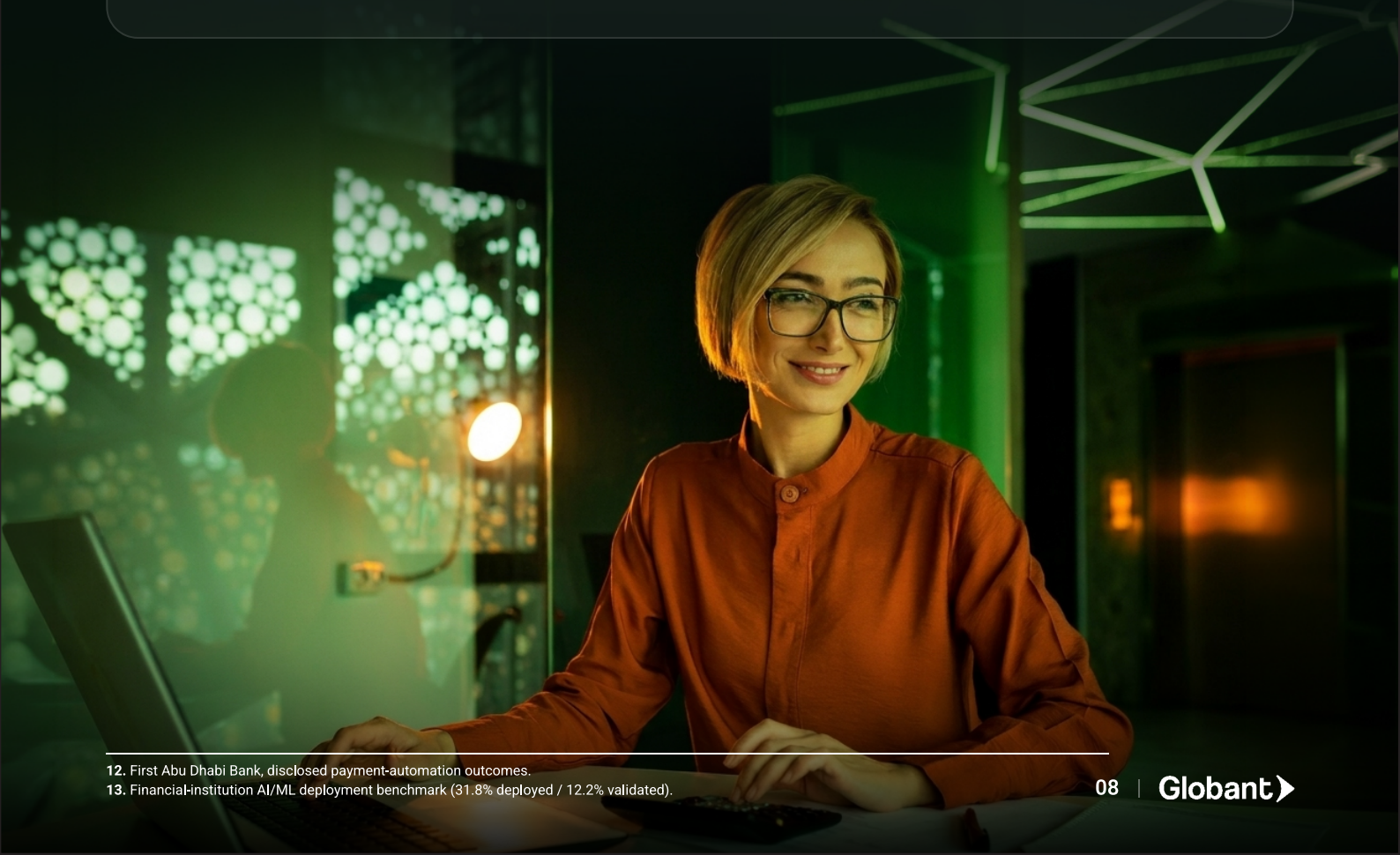
Payment automation at FAB and 312K hours saved at Nedbank.[12] Leading institutions report quantified outcomes today; early movers establish durable advantages, but the window is closing fast.

Invisible Third-party agents bypass the bank

Agents embedded in operating systems and browsers will transact on banking infrastructure directly, reducing banks that don't build their own orchestration layer to commoditized capital utilities.

31.8% Execution, not ambition, is the constraint

Financial institutions have deployed AI/ML, yet only 12.2% can prove it is working.[13] The gap is the talent, governance, and data infrastructure required to scale from pilot to enterprise deployment.



12. First Abu Dhabi Bank, disclosed payment-automation outcomes.
13. Financial-institution AI/ML deployment benchmark (31.8% deployed / 12.2% validated).

THE AGENTIC TRANSITION

From mobile banking to a Financial Life OS

At the center of the new architecture sits the **AI Companion**, a persistent conversational orchestrator that directs specialized sub-agents in real time.

LEGACY MOBILE BANKING	EMERGENT FINANCIAL LIFE OS
Static menu hierarchies and search bars	Persistent conversational orchestrator (AI Companion)
Reactive, user-initiated form filling	Proactive, event-driven intent prediction
Isolated transaction and product processing	End-to-end orchestration of life outcomes
Platform uptime and transaction speed	Autonomous execution quality & cognitive offload
Monolithic or service-oriented APIs	Decoupled model-context servers & sovereign trust
INTERFACE · INTERACTION	SCOPE · VALUE · TECHNOLOGY



The shift to "linguistic" core architectures

To sustain autonomous flows, banks must undergo a structural technical modernization across three dimensions.

1

From APIs to LUIs

Legacy cores built on rigid GUIs and procedural APIs are replaced by cloud-native, model-readable architectures. Endpoints shift from graphical screens to dynamic Linguistic User Interfaces.

2

Linguistic endpoints

Internal endpoints are structured as standardized, machine-readable tool schemas, discoverable and executable by autonomous agents without human-facing menus.

3

Real-time data planes

Overnight batch processing gives way to converged real-time streams. Under a framework like R.A.C.E., agents access instant data to hold accurate context and prevent hallucination.



Dismantling the inertia economy

Retail banking profits from consumer inertia: idle cash in zero-interest accounts, unused subscriptions, un-refinanced debt. Agentic systems close that gap by sweeping idle cash into high-yield instruments. As adoption scales, low-cost deposit stickiness erodes.

IMPACT OF AUTOMATED DEPOSIT-SWEEP PROTOCOLS

5% adoption — **NII −2% to −5%**

Low outflow, concentrated in high-net-worth segments. Cost of funds +15 to +25 bps.

15% adoption — **NII −8% to −12%**

Moderate migration, mass-affluent mainstream adoption. Cost of funds +50 to +75 bps.

30% adoption — **NII −18% to −25%**

High migration, standardized consumer-app integration. Cost of funds +120 to +160 bps.



The bank's core asset becomes trust brokerage

Permissioning layer

As consumers use personal AI to shop and manage money, the bank's primary asset becomes its status as a licensed, trusted authority, authenticating identities and delegating transactional authority to verified agents.

Machine-to-machine trust

Banks become the ultimate governance layer, deciding which autonomous third-party agents can transact, against whose balance sheet, under what limits, and with what legal recourse. This brokerage is the core value proposition.

Commoditization risk

When AI agents constantly optimize across the entire market, standard products are commoditized. Victory goes to institutions providing the most seamless, machine-readable, optimized integration rails.





OPEN BANKING, THE CONNECTIVE HIGHWAY

Three operational superpowers

In the GCC, that transformation is already regulatorily underwritten. The UAE's Open Finance Regulation (CBUAE Circular 7 of 2023, updated by Circular 3 of 2025) mandates cross-sectoral data sharing and service initiation through a centralised API hub under the AlTareq standards, a more consolidated architecture than the bilateral models of most open-banking regimes. In Saudi Arabia, SAMA moved open banking from sandbox to a formally supervised, licensed activity in March 2026, covering account information, payment initiation, and confirmation of funds. For an agentic orchestrator this matters structurally: standardised, centrally governed rails materially reduce the integration surface an AI Companion must maintain to act across a customer's full financial life.

LIQUIDITY

Sovereign multi-bank sweeps

An Open-Banking agent scans rate tiers across the entire ecosystem, sweeping idle cash to the highest-yield instrument at any institution, returning liquidity milliseconds before a payment is due.

CREDIT

Ready-to-underwrite profiles

The Credit Risk Agent pulls transaction history, payroll data, and asset valuations across all relationships in real time, synthesizing an explainable credit summary and compressing underwriting from days to under a minute.

WEALTH

Universal wealth allocation

The Wealth Specialist Agent monitors external brokerage, pension, and real-estate registries. On detecting allocation drift or macro exposure, it drafts a rebalancing plan across the customer's entire net worth.

GLOBANT'S AUTONOMY DIAL

A graduated, consumer-controlled trust framework

Consumers won't grant absolute autonomy on day one. The dial lets users set the boundary between human intent and machine action, per transaction type, size, and recipient.

Suggest Observation — Human-only execution

The AI Companion surfaces Decision Cards ("You have $5K idle at 0%, sweep to iSave?"). The user keeps 100% of execution rights and completes transactions manually.

Approve Co-Pilot — One-tap confirmation

The optimizer structures the complete transaction. The customer receives an out-of-band biometric prompt and co-signs with a single tap. The agent executes instantly.

Act Sovereign — Full agent autonomy

The consumer grants a legally binding, cryptographically signed mandate. The agent operates within predefined safety envelopes ("cancel duplicate subscriptions under $100") and notifies the customer after execution.

The Agentic Marketplace

For the first time, banks can treat financial intelligence as a high-margin, recurring SaaS P&L, with specialized agents packaged into subscription tiers.

Core Mass market

Basic AI Companion Brief, Financial Readiness Score, Suggest mode, and foundational Decision Cards.

Free

MOST ADOPTED

Plus Mass-affluent

Full conversational AI Companion, Approve mode, scenario planning, pre-approved loan originations, automated Life Missions.

Paid subscription (ARR)

Prime Elite · Private · SME

Act mode (sovereign execution), advisory wealth agents, tax & compliance agents, human-RM concierge escalation.

Premium + commissions

THE EMBEDDED-FINANCE LAYER IN ACTION

Saudi fintech **SILQ** raised a **$20M** Shariah-compliant structured financing facility specifically to scale embedded finance for SMEs, proof that the API-distributed financial-product layer is being built natively, with Sharia-compliant capital.[26]

Banks can upsell proprietary premium agents such as the **Subscription Killer**, which autonomously detects and cancels unused recurring billing, unlocking high-margin ARR and revenue-share commissions.

26. Draup GCC BFSI Intelligence report, Saudi Arabia, July 2026.

Three strategic postures toward personal AI agents

Wait & See

Maintain legacy channels; defer agentic investment until standards stabilize. Relationship lost to external platform agents over 3 to 5 years; severe margin contraction as deposits migrate.

Adapt & Supply

Relinquish the front end; optimize the back end as a machine-readable product provider. Relationship shared or outsourced to the consumer's agent; high volume, lower margins.

Compete & Orchestrate

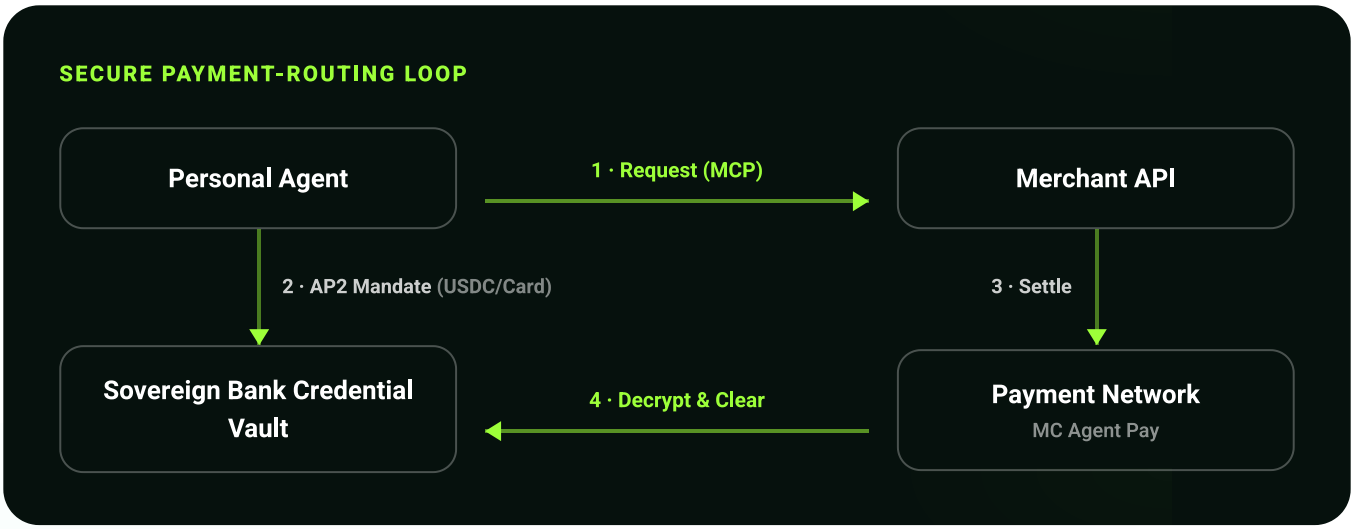
RECOMMENDED

Build a proprietary trusted platform; position the AI Companion as the central aggregator. Relationship retained and deepened; high-margin retention, subscription revenue, and partner commissions.



Navigating agentic commerce

AI agents autonomously browse, compare, and pay without checkout pages. Gartner[14] expects machine customers to generate **20%+ of revenue by 2030**. Banks must become the Sovereign Credential & Identity Vault.



KYA **Cryptographic identity.** Replace KYC with Know Your Agent; every transaction carries a verifiable credential binding the agent to an accountable human principal.

A2A x402 **Decoupled micropayments.** The A2A x402 protocol triggers instant stablecoin settlement on Base or Solana.

AP2 **The mandate model.** Google's Agent Payments Protocol links three W3C Verifiable Credentials (Intent, Cart, Payment) proving the AI never exceeded authorized limits.



14. Gartner, machine-customers forecast (20%+ of revenue by 2030).

REGIONAL FOCUS, GCC

Middle East implications

Qatar's Central Bank has licensed **16 supervised fintechs** and is expanding its sandbox, recently authorizing Ammen, the region's first insurance price-comparison platform, a signal that sandbox-friendly, open-finance-ready regulation is becoming the GCC's default stance, not an outlier. Saudi Arabia's SAMA has upgraded its own sandbox with an automated application portal and live tracking.[23]

1 Data sovereignty & CBUAE compliance

Public messaging platforms (including WhatsApp) are prohibited for customer data or transactions.[1] All models, vector databases, and audit logs must reside within national borders under the UAE PDPL, deployed in AWS me-central-1 with Amazon Bedrock UAE.

2 Sharia-compliant agentic execution

In the GCC, Sharia-compliant execution is not a specialist module, it is the majority of the addressable market: Islamic banks hold roughly **76% of banking assets in Saudi Arabia** and about half in Kuwait, with material shares across Bahrain, Qatar, Oman, and the UAE.[21] An architecture that treats Sharia compliance as a downstream add-on is designed for a minority of the region's balance sheet. Islamic products (Murabaha, Ijara, Wakala) follow defined sequences, routed to a deterministic BPMN state engine that validates each step before any ledger change; probabilistic model outputs are architecturally prohibited.[16]

REGIONAL PIONEERS

Mastercard Agent Pay, Dubai (Nov 2025): pilots with Majid Al Futtaim for programmatic VOX Cinema ticketing.[2] **The region is no longer theorising agentic commerce; it is running in production. Visa Agentic Ready, UAE (May 2026):**[3, 17] agent-initiated pipelines in production with:

ADCB · ADIB · Emirates NBD · Mashreq · Tabby · Wio · Ziina



1. CBUAE Circular CBUAE/MCS/2026/2058 (April 2026), public messaging-platform prohibition.
2. Mastercard Agent Pay regional pilot with Majid Al Futtaim, Dubai (November 2025).
3. Visa Agentic Ready early adopters, UAE (May 2026).
16. Islamic-finance Sharia transaction-sequence standards.
17. Visa Agentic Ready program, UAE (May 2026).
21. S&P Global Ratings, 2026.
23. Draup GCC BFSI Intelligence report, Qatar, July 2026.

OPERATING MODEL

The hybrid workforce structure

Digital co-workers

Specialized AI agents are formally onboarded, assigned credentials, and managed through performance logs as domain-specific specialists.

Human-in-the-loop

Human teams are reserved for complex judgment, high-value strategy, escalated exceptions, and customer empathy.

Hyper-lean organizations

Routine processing shifts to supervised agents, letting a smaller team support millions of customers via thousands of backend agents.

500 human specialists › **1,000s** backend agents › **Millions** customers served

30-40%[18]
lower operating costs

Seconds
vs day-long execution

Model-to-model
vs rigid GUIs

18. Operational-cost reduction estimate (30–40%).

The AI Companion orchestrator, and four functions re-engineered

AI Companion Orchestrator

01 Onboarding & KYC

Verification and KYC agents validate IDs and query sanctions in parallel. Straight-through account creation in under 30 seconds for clean cases.

02 Mortgages

A unified Life Mission: agents calculate a risk-adjusted limit from real cash flows, model scenarios, and prepare compliant dossiers.

03 Loans & Credit

Alternative-data scoring unlocks credit for thin-file individuals; explainable declines output exact decision variables for adverse-action notices.

04 Wealth & Assets

The Wealth Specialist Agent detects drift, models a rebalancing plan, runs pre-trade compliance, and prepares a full RM briefing in milliseconds.

LIVE EXAMPLE · LOANS & CREDIT

In Saudi Arabia, SAMA granted **Tabby** dual consumer-finance and SME-finance licenses this year, the clearest signal yet that BNPL players are graduating into full alternative-data underwriters.[25]



25. GCC BFSI Intelligence report, Saudi Arabia, July 2026.

The architectural control plane

The blueprint separates the intelligence layers (1 to 5) from the data layer, keeping legacy integrations (6 to 8) unchanged while new cognitive layers are safely introduced.

1	**Channel & Mobile App**	Biometrics, deep linking, bilingual (AR/EN)
2	**Experience & Design System**	Fluid UI engine, WCAG 2.2 AA
3	**Agentic Orchestration**	AI Companion orchestrator & sub-agents, EKS UAE
4	**Intelligence Layer**	Model routing & safety, Bedrock UAE, Claude
5	**Data Layer**	Vector stores & semantic indexes, OpenSearch
6	**API Integration**	Legacy access, unchanged
7	**Core Banking**	Ledger-of-record, on-prem / private cloud
8	**Data Platform**	Data lake & streaming, S3 UAE / Kafka



Protocols powering machine-to-machine finance

Four open standards give banks, merchants, and networks a shared language for how an agent accesses data and proves it may spend.

MCP Model Context Protocol, the connection layer

A universal adapter: a bank exposes a standardized MCP server (check balance, initiate transfer, pull statement) and any MCP-speaking agent can use it securely, without bespoke engineering.

AP2 Agent Payments Protocol, the authorization layer

A chain of three signed permissions (intent, cart, payment) creates a verifiable trail proving the AI never exceeded what the human agreed to.

Agent Pay Mastercard, the card rail

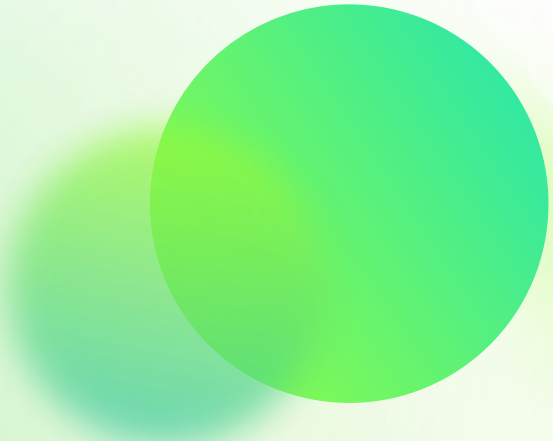
A token bound to a specific agent and spending policy. The real card number is never exposed, and the customer can revoke access instantly.

x402 A2A x402, the stablecoin rail

Revives the HTTP 402 response to trigger automatic, real-time stablecoin settlement, with no merchant onboarding process.

HOW THEY STACK TOGETHER

MCP lets the agent see and act, AP2 proves the human authorized it, and Mastercard Agent Pay or A2A x402 move the money, over card rails or stablecoin rails. Banks that support all four can participate in agent-initiated transactions regardless of the network the customer's agent prefers.



Sovereign trust & pre-action authorization

Autonomous agents introduce risk vectors traditional firewalls cannot mitigate. Security shifts to continuous, real-time authority governance.

Hardware roots of trust
Keys originate in HSMs and Secure Enclaves.

Continuous attestation
Authority evaluated at every execution step.

Post-quantum crypto
NIST ML-KEM / ML-DSA signature envelopes.

Sovereign Agentic Loops (SAL): every proposed tool call is intercepted before the gateway, evaluated against real-time balances and an Open Policy Agent engine, and declined or routed to human review if it violates rules, regardless of model confidence. Every outcome is recorded in an immutable Evidence Chain.

THREAT VECTORS & MITIGATIONS

Indirect prompt injection	Inline sanitization: sub-50ms regex + semantic classification
Agent decision drift	Continuous attestation: daily checks vs reference outputs
API token exfiltration	Outbound Access Protection: strict egress control
Probabilistic failure	Pre-action authorization: OPA validates all tool calls



COMPLIANCE BY DESIGN

Four global frameworks governing autonomous action

EU AI Act

Credit scoring and underwriting are high-risk AI (Annex III).[5] Banks build an adversarial Critique Layer that challenges the primary agent's outputs before any recommendation reaches a supervisor.

CFPB Circular 2022-03 (ECOA)[19]

A no-AI-exception policy: an AI denial requires a plain-language Adverse Action Notice.[7] MCP and XAI log every feature weighting into regulatory-ready explanations.

Federal Reserve SR 26-2[20]

Model Risk Management for scoring and decisioning models feeding multi-agent pipelines. Banks maintain a Model Risk Inventory with end-to-end data lineage and real-time monitoring.[8]

DORA & FCA Operational Resilience

Mandates hardcoded kill switches: a SCIM DELETE instantly revokes a rogue agent's credentials across all systems, freezing transactions in real time.



5. EU AI Act, Annex III — high-risk AI classification.
7. CFPB Circular 2022-03 (ECOA), adverse-action-notice requirement.
8. Federal Reserve SR 26-2, Model Risk Management (April 2026).
19. CFPB Circular 2022-03 (ECOA).
20. Federal Reserve SR 26-2 (April 2026).

Steady-state operating model

After implementation, the Financial Life OS is maintained through three separately governed streams, optimizing run costs while sustaining agility.

RUN

Maintenance Platform Stream — **$2.0-2.5M**

SRE support, prompt-registry updates, model routing, marketplace compliance auditing.

SCALE

Cloud Consumption Layer — **Variable**

LLM inference, vector storage, session state, observability logging.

CHANGE

Evolution Platform Stream — **$4.5-6.0M**

New agent design, capability scaling for new segments, new API endpoints.



Three directives to lead the transformation

01 Play offense

Build a proprietary, trusted agentic orchestration layer. Positioning the AI Companion as the central aggregator of the user's financial life retains relationship ownership and prevents third-party assistants from commoditizing the bank.

02 Make infrastructure agent-ready

Architect APIs to be highly machine-readable and optimization-friendly. Align with MCP for tool access, AP2 for verifiable delegation mandates, and Mastercard Agent Pay for tokenized card transactions.

03 Govern before you scale

Implement Sovereign Agentic Loops to decouple probabilistic reasoning from deterministic execution. Validate every action against strict policy, and record each evaluation in an immutable, legally defensible audit trail.

FOR THE GCC, THE SEQUENCING IS COMPRESSED

Mandated open-finance rails, a young, digitally native customer base, and government-aligned modernization agendas mean the enabling conditions are already met, evidenced by Saudi Arabia's fintech sector alone, projected to exceed **$3.5B in revenue by 2030** and already drawing active Silicon Valley VC interest.[24] The constraint is no longer infrastructure readiness. It is whether the institution builds the orchestration and governance layer, or a third-party agent does it on its behalf.

24. Draup GCC BFSI Intelligence report, Saudi Arabia, July 2026.

References & footnotes

Numbered footnotes for externally sourced data points cited throughout this report. In-text superscript markers correspond to the entries below.

1. CBUAE Circular CBUAE/MCS/2026/2058 (April 2026), public messaging-platform prohibition. p.18
2. Mastercard Agent Pay regional pilot with Majid Al Futtaim, Dubai (November 2025). p.18
3. Visa Agentic Ready early adopters, UAE (May 2026). p.18
4. Legacy onboarding cost benchmark (up to 5% of banking operating costs). p.20
5. EU AI Act, Annex III — high-risk AI classification. p.24
6. EU AI Act, Article 14 — human-oversight requirements. p.24
7. CFPB Circular 2022-03 (ECOA), adverse-action-notice requirement. p.24
8. Federal Reserve SR 26-2, Model Risk Management (April 2026). p.24
9. Agentic AI adoption survey (99% aware / 31% implementing / 46% interested). p.06
10. Evident AI Index, Banks MEA: Key Findings Report, June 2026. p.07
11. Moody's, in collaboration with Asian Banking & Finance, 2026. p.07
12. First Abu Dhabi Bank, disclosed payment-automation outcomes. p.08
13. Financial-institution AI/ML deployment benchmark (31.8% deployed / 12.2% validated). p.08
14. Gartner, machine-customers forecast (20%+ of revenue by 2030). p.17
15. Dubai cashless-transactions target (90%+ digital by 2026). p.07
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18. Operational-cost reduction estimate (30–40%). p.19
19. CFPB Circular 2022-03 (ECOA). p.24
20. Federal Reserve SR 26-2 (April 2026). p.24
21. S&P Global Ratings, 2026. p.18
22. Draup GCC BFSI Intelligence report, Saudi Arabia, July 2026. p.07
23. Draup GCC BFSI Intelligence report, Qatar, July 2026. p.18
24. Draup GCC BFSI Intelligence report, Saudi Arabia, July 2026. p.26
25. GCC BFSI Intelligence report, Saudi Arabia, July 2026. p.20
26. Draup GCC BFSI Intelligence report, Saudi Arabia, July 2026. p.15

THE AGENTIC TRANSITION

This is the Agentic Banking Paradigm. It starts now.

Retail banking spent two decades digitizing transactions. The next decade is about delegating financial decisions to trusted autonomous systems. Institutions that become the trusted orchestration layer will define the next generation of customer relationships.


Globant