THE SIX DIMENSIONS OF CLIENT LIFECYCLE MATURITY

A maturity framework for Swiss banks & a structured path from regulatory exposure to operational advantage across the full client lifecycle.

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CONTENT

EXECUTIVE SUMMARY

Client onboarding is the first moment of truth in a banking relationship. But it is only the first. Everything that follows - the periodic review that keeps a client file current, the screening that catches a sanctioned counterparty, the regulatory change that must be absorbed without a fire drill, the architecture that either enables all of this or quietly obstructs it, and the operating model that decides who is accountable when something goes wrong - together forms the Client Lifecycle. In Swiss banking, the lifecycle is where regulatory pressure, technology debt, and commercial ambition collide. Many Swiss banks manage these stages in isolation. Onboarding sits with the front office and a digital team. Periodic reviews sit with operations and a backlog spreadsheet. KYC and AML screening sit with compliance and a vendor platform. Regulatory change sits with legal and a watchlist of circulars. The result is a lifecycle that is locally optimized and globally fragile: each stage defensible on its own, the whole exposed at the seams between them. It is precisely at those seams - the handoff from onboarding to first review, the link between a regulatory change and the workflows it touches - that enforcement findings, client attrition, and cost overruns concentrate.

This whitepaper sets out a six-dimension maturity framework for Client Lifecycle Management (CLM): Onboarding, Periodic Review, KYC/AML Compliance, Regulatory Change Management, Technology & Architecture, and Governance & Operating Model. Each dimension is assessed against a common five-level maturity ladder, from Baseline to Intelligent. The framework is deliberately built for the three executives jointly accountable for the lifecycle's control environment - the Chief Risk Officer, the Chief Compliance Officer, and the Chief Operating Officer - because no one of them owns it alone, and the gaps that matter most live in the space between their mandates.

The thesis throughout is consistent with what disciplined Swiss programs repeatedly demonstrate: regulatory confidence is a prerequisite for commercial velocity, not a constraint on it. Banks that treat compliance as a design input - embedded into the workflow, the data model, and the operating model from the start - consistently deliver faster, cheaper, and more durable outcomes than those that bolt it on at a review gate. The maturity framework exists to locate, dimension by dimension, exactly where a bank stands today and where the highest-return next step lies.

> Onboarding delays and KYC backlogs often reveal a deeper problem: a fragmented client lifecycle. Risk accumulates where data, workflows and accountability do not connect.

1. The swiss context: why the lifecycle, not the stage, is the unit of risk

Switzerland's banking landscape is distinctive. It combines a globally significant private banking sector, a dense network of cantonal and regional banks operating under explicit public-service mandates, and a domestic market with high digital expectations and deep trust requirements. The same regulatory perimeter governs all of them, and that perimeter does not recognize the internal boundaries banks draw between functions.

1.1. The Regulatory Imperative Spans the Whole Lifecycle

Swiss banks operate under layered obligations. Critically, no single obligation is confined to a single lifecycle stage. The revised Anti-Money Laundering Act shapes onboarding due diligence, periodic review triggers, and ongoing screening simultaneously. FINMA Circular 2016/7 governs digital identification at onboarding and the evidential standard those records must meet years later in a review. This cross-cutting quality is exactly why a stage-by-stage view of compliance is structurally incomplete.

Regulatory Framework	Lifecycle Relevance
Revised AMLA (in force 1 October 2026)	Customer Due Diligence (CDD) and beneficial-ownership identification at onboarding; risk-based periodic review obligations; ongoing screening and monitoring; documentary evidence retention across the full relationship.
FINMA Circular 2016/7	Video and online identification standards for digital onboarding; the evidential quality of identity records that must remain auditable throughout the lifecycle. Under revision as of early 2026 (consultation closed 27 February 2026) to accommodate the Swiss e-ID.
FinSA (FIDLEG)	Appropriateness and suitability assessments during onboarding and when material changes occur; it enforces client segmentations that determine the depth of regulatory protection and product access required. FINMA Circular 2025/2 is the current supervisory-practice reference for these conduct obligations.
CDB 20 (SBA due-diligence agreement) & AMLO-FINMA	The operative self-regulatory identification standard, referenced by AMLO-FINMA, for verifying the contracting partner, controlling person and beneficial owner at onboarding and throughout the relationship. Both CDB 20 and AMLO-FINMA are being revised alongside the AMLA/LETA reform, with the revised versions expected in force 1 January 2027 at the earliest (Swiss Bankers Association). 2026)
FINMA Circular 2023/1 (Operational Resilience)	End-to-end resilience of critical processes - including client lifecycle workflows - whose transition period ended 1 January 2026. FINMA's own late-2025 survey of 267 institutions found most still lack a genuinely integrated framework (FINMA Guidance 05/2025).
nDSG (Swiss Data Protection)	Data minimization, purpose limitation, consent capture, and cross-border transfer obligations embedded into every lifecycle data flow.
FATF Mutual Evaluation (2027–2028 cycle)	National-level scrutiny of AML/CFT effectiveness, cascading into supervisory expectations on Customer Due Diligence (CDD) quality, screening, and review discipline at individual institutions.

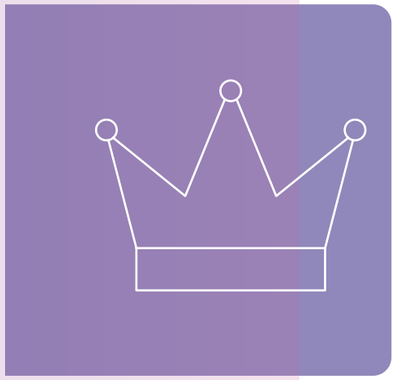
Table 1 - Swiss regulatory frameworks and their cross-lifecycle reach

1.2. The Commercial Pressure Compounds the Regulatory One

Digital challengers have demonstrated that compliant onboarding can be completed in minutes, and the expectation that incumbents narrow the gap is now firmly set. According to Fenergo's 2024 survey of over 450 banking executives, 67% of banks reported losing clients to slow or inefficient onboarding - the highest level recorded at the time, and one that rose further in the 2025 follow-up. But the commercial cost is not confined to acquisition. A periodic-review backlog freezes capital in remediation rather than revenue. A false-positive-heavy screening function burns analyst capacity that could be redeployed. A brittle architecture turns every regulatory change into a project. The lifecycle view makes these costs visible as a system, not as isolated line items.

KEY FIGURES

Banks commonly assign 10–15% of their full-time workforce to KYC and AML activity, yet the financial industry detects only an estimated 2% of global financial-crime flows (McKinsey, 2024, citing Interpol). The efficiency gap is not a rounding error - it is a strategic opportunity. In parallel, 67% of banks reported losing clients to slow or inefficient onboarding in 2024, up from 48% in 2023 (Fenergo, 2024 KYC & Onboarding Trends, 450+ C-suite respondents) - a figure Fenergo's 2025 survey put at 70%.



2. The six dimensions of client lifecycle maturity

The framework decomposes the client lifecycle into six dimensions. Each is assessed independently against a common five-level maturity ladder, because a bank is rarely uniform: it may run an Integrated onboarding flow while its periodic review remains at Baseline, or operate a sophisticated screening engine on top of a Governance model that cannot say who owns the risk decision. Assessing each dimension separately is what turns a vague sense of ‚we need to modernize' into a prioritized roadmap: distinguishing regulatory must-haves from strategic nice-to-haves.

2.1. The Common Maturity Ladder

All six dimensions are scored against the same five maturity levels. Level names are constant across dimensions; what each level means in practice is defined individually in the sections that follow. Data quality is not treated as a separate seventh dimension; it runs as a common thread through all six, constraining maturity wherever data is incomplete, inaccurate, untimely or insufficiently traceable.

L5 • Intelligent
AI-assisted analysis within a deterministic compliance envelope

L4 • Orchestrated
Event-driven workflows across dimensions; exceptions routed, not chased

L3 • Integrated
Systems of record connected; straight-through for standard cases; auditable by design

adesso view:practical minimum for Swiss banks

L2 • Digitized
Electronic and standardized, but siloed; data re-keyed across systems

L1 • Baseline
Manual, spreadsheet-driven, person-dependent; weak audit trail

Table 2 - The five-level CLM maturity ladder, applied across all six dimensions

A note on Level 5: intelligent maturity does not mean autonomous AI. In a Swiss regulatory context, the compliance and security decision zone remains deterministic and governed: AI accelerates the surrounding work (gathering, summarizing, prioritizing, drafting), while human judgment and rule-based controls retain authority over the decision itself. Industry evidence is sobering: Relatively few banks have demonstrably scaled AI into production in regulated processes. Maturity at Level 5 is earned through the data-governance discipline of Level 3 and the orchestration of Level 4 - it is never skipped to.

Dimension 1 Client Onboarding

2.2. Dimension 1 - Client Onboarding

Onboarding is where the relationship and the regulatory file are created simultaneously. It is the dimension most banks have invested in, and therefore the one where the gap between leaders and laggards is widest.

THE PAIN TODAY

Many Swiss banks still run onboarding processes marked by paper-heavy steps, channel silos, and manual data re-entry - accepting cycle times measured in days or weeks that would be unacceptable in any other customer-facing industry. Each restart, each re-keyed field, and each channel break is both a client-experience failure and a data-quality risk that propagates into every later lifecycle stage.

WHAT GOOD LOOKS LIKE

- Account activation measured in minutes and hours, not days, for standard low-risk journeys.
- First-time-right data capture with omnichannel continuity - a journey started in one channel completes in another without restart.
- Risk-based approval lanes: straight-through processing for standard cases, structured exception workflows with full auditability for elevated-risk cases.
- Compliance by design - AMLA CDD and FinSA suitability embedded in the flow, not enforced by manual work-around.

OBSERVED FAILURE MODELS

- Treating onboarding as a front-office UX project rather than a cross-functional compliance program with a client-experience wrapper.
- Deferring systems-of-record and integration decisions until they land on the critical path and trigger cascading rework.
- Designing only for the straight-through path, so the arrival of real-world exceptions creates an operational crisis.
- Deploying AI-assisted capture before compliance has validated conformity with regulatory requirements: recognized identity verification method, document evidential quality, and auditability throughout the lifecycle.

REGULATORY HOOK

FINMA lens - Digital identification must meet the standards of FINMA Circular 2016/7 (currently under revision), and the evidence captured at onboarding must remain auditable for the life of the relationship. Onboarding data quality is a major determinant of downstream review and screening effort.

MATURITY SIGNPOSTS

L1 Baseline	L2 Digitized	L3 Integrated	L4 Orchestraded	L5 Intelligent
Paper/email-heavy, branch-centric, frequent restarts, weak audit trail, unpredictable cycle times.	E-forms and basic workflow, early e-signature, standardized steps - but channel silos and limited automation.	Omnichannel continuity, core/CRM/screening integration, trusted data reuse, material STP for standard journeys.	Event-driven journeys orchestrated across channels; exceptions auto-routed; onboarding triggers first review and screening automatically.	AI-assisted capture and guidance within a governed envelope; personalized, risk-adaptive journeys; continuous data validation.

Table 3 - Maturity ladder for Dimension 1 - Client Onboarding

Dimension 2 Periodic Review

2.3. Dimension 2 - Periodic Review

Periodic review is the dimension most often neglected and most reliably found wanting by supervisors. It is where onboarding-era assumptions are meant to be re-tested against the client as they are today - and where backlogs quietly accumulate into systemic risk.

THE PAIN TODAY

Reviews are commonly manual and spreadsheet-driven, performed on fixed calendar cycles regardless of actual risk, and frequently running behind schedule. Remediation backlogs measured in months are a familiar pattern in KYC operating-model reviews. A calendar-based model means low-risk clients consume review capacity on schedule while a materially changed high-risk client may wait for attention - tending to invert where scrutiny should fall.

WHAT GOOD LOOKS LIKE

- Event-driven review triggers: a change in beneficial ownership, jurisdiction, transaction pattern, or adverse-media signal initiates review automatically.
- Risk-based prioritization that directs scarce analyst capacity to the files that have actually changed.
- AI-generated review packages that assemble the file, summarize changes since last review, and surface anomalies for human decision.
- A live, auditable view of backlog, aging, and risk distribution available to operations and compliance management.

OBSERVED FAILURE MODELS

- Running reviews on calendar cycles alone, decoupled from real-world risk events.
- Carrying backlog as an operational nuisance rather than treating it as a supervisable compliance gap.
- Re-collecting information the bank already holds because review is disconnected from the systems of record.
- No defined linkage between a periodic review and the screening, onboarding, or regulatory-change dimensions that should feed it.

REGULATORY HOOK

FINMA lens - Periodic review backlogs are a recurring theme in FINMA supervisory feedback. The revised AMLA's risk-based expectations make a purely calendar-driven model increasingly difficult to defend; supervisors expect review intensity to track client risk, demonstrably and on an auditable basis.

MATURITY SIGNPOSTS

L1 Baseline	L2 Digitized	L3 Integrated	L4 Orchestraded	L5 Intelligent
Manual, spreadsheet-driven, fixed-calendar, chronic backlog, no risk-based prioritization.	Digitized review records and basic workflow, but still calendar-triggered and largely manual data gathering.	Integrated with systems of record; data auto-assembled; backlog visible; risk-based scheduling introduced.	Event-driven triggers from screening, transactions, and external signals; reviews orchestrated and auto-prioritized by risk.	AI-assembled review packages with change summaries and anomaly flags; predictive prioritization; trend toward continuous KYC.

Table 4 - Maturity ladder for Dimension 2 - Periodic Review

Dimension 3 KYC / AML Compliance

2.4. Dimension 3 - KYC / AML Compliance

This dimension covers the screening, monitoring, and due-diligence engine that runs continuously beneath the lifecycle: sanctions and PEP screening, adverse media, transaction monitoring, and the data quality on which all of it depends.

THE PAIN TODAY

Many banks operate capable screening platforms producing punishing false-positive rates, consuming 10–15% of the workforce while the industry detects only an estimated 2% of illicit financial flows (McKinsey, citing Interpol). The problem is rarely the screening tool in isolation; it is poor input data quality, weak entity resolution, and disconnection from the onboarding and review dimensions that should keep that data current.

WHAT GOOD LOOKS LIKE

- High-quality, resolved entity data - a single, reconciled view of each client and connected parties.
- Tuned screening that materially reduces false positives without raising the risk of false negatives, with the tuning itself documented and defensible.
- Risk-based monitoring that adapts thresholds to client risk rather than applying uniform rules.
- Clear, auditable disposition of every alert, with escalation paths to the second line built into the workflow.

OBSERVED FAILURE MODELS

- Treating screening as a tooling question while ignoring the input-data-quality problem that drives false positives.
- Weak entity resolution that fragments a single client across multiple records and defeats both screening and monitoring.
- Alert dispositions recorded in free text or system logs rather than in a structured, audit-ready evidence trail.
- Screening and monitoring disconnected from periodic review, so a screening hit does not reliably trigger a review

REGULATORY HOOK

FINMA lens - AMLA and FATF expectations center on the effectiveness of CDD, screening, and monitoring - not merely their existence. With the 2027–2028 FATF mutual evaluation cycle in view, supervisors are increasingly focused on demonstrable outcomes: resolved entities, defensible tuning, and auditable alert handling.

MATURITY SIGNPOSTS

L1 Baseline	L2 Digitized	L3 Integrated	L4 Orchestraded	L5 Intelligent
Manual or basic screening, high false positives, weak entity resolution, free-text alert handling.	Digitized screening platform in place but siloed; uniform rules; limited data-quality remediation.	Integrated with resolved entity data and systems of record; structured, auditable alert disposition.	Risk-based, orchestrated monitoring; screening hits auto-trigger review; tuning governed and documented.	AI-assisted detection and alert triage within a deterministic decision envelope; continuous monitoring; predictive risk scoring.

Table 5 - Maturity ladder for Dimension 3 - KYC / AML Compliance

Dimension 4 Regulatory Change Management

2.5. Dimension 4 - Regulatory Change Management

This dimension measures how a bank absorbs regulatory change - from the moment a circular is published to the moment the affected workflows, controls, and evidence are demonstrably updated. It is the dimension that determines whether revised AMLA (1 October 2026), FATF 2027–2028, and operational-resilience deadlines are managed events or recurring fire drills.

THE PAIN TODAY

In many institutions, regulatory change is tracked by legal as a watchlist of circulars, then handed to operations and IT as a series of disconnected projects. There is rarely a maintained map from a given regulation to the specific onboarding steps, review rules, screening configurations, and audit artifacts it governs. As a result, impact assessment is slow, manual, and incomplete, and the link between a rule change and the workflow change it requires is reconstructed from scratch every time.

WHAT GOOD LOOKS LIKE

- Active regulatory monitoring across FINMA, and where relevant MAS, HKMA, and others for cross-border operations.
- A maintained mapping from each regulatory obligation to the specific lifecycle workflows, controls, and evidence it touches.
- Rapid, structured impact assessment: a published change yields a scoped change-list within days, not months.
- A controlled implementation path with evidence that the change was applied, tested, and is auditable.

OBSERVED FAILURE MODELS

- Tracking regulatory change as a document list disconnected from the processes it governs.
- Reconstructing the regulation-to-workflow impact map manually for every change.
- Discovering the operational implications of a change late, when a deadline is already on the critical path.
- No closed loop proving that an intended change was actually implemented and is evidenced for the supervisor.

REGULATORY HOOK

FINMA lens - The revised AMLA enters into force on 1 October 2026; the transition period for FINMA operational-resilience expectations under Circular 2023/1 ended on 1 January 2026, and FINMA's own late-2025 survey found most institutions still fall short of an integrated framework (Guidance 05/2025); and the FATF cycle adds national-level pressure. Banks without a structured change-management capability will tend to meet these as crises rather than as managed events.

MATURITY SIGNPOSTS

L1 Baseline	L2 Digitized	L3 Integrated	L4 Orchestraded	L5 Intelligent
Manual watch-list of circulars; ad-hoc, reactive impact assessment; no regulation-to-process mapping.	Digitized tracking of obligations, but impact assessment still manual and disconnected from workflows.	Integrated mapping from obligations to affected processes and controls; structured, repeatable impact assessment.	Orchestrated change propagation: a logged obligation drives scoped change-lists across affected dimensions automatically.	AI-assisted horizon scanning and impact assessment; draft change-lists generated and routed for human validation; closed-loop evidence.

Table 6 - Maturity ladder for Dimension 4 - Regulatory Change Management

Dimension 5 Technology & Architecture

2.6. Dimension 5 - Technology & Architecture

This dimension is the enabler or the constraint for all the others. It covers system integration, workflow orchestration, data architecture, API readiness, and the degree to which the lifecycle runs on connected platforms versus fragmented point solutions.

THE PAIN TODAY

The common state is a landscape of capable individual systems - core banking, CRM, screening, document management - connected by manual handoffs and re-keying rather than by integration. Workflow logic is scattered across the systems that happen to host it, with no orchestration layer that owns the end-to-end client journey. The consequence is that every cross-stage improvement and every regulatory change becomes an integration project, and the bank pays an architecture tax on all of them.

WHAT GOOD LOOKS LIKE

- A clear systems-of-record definition: which platform is authoritative for which data, settled before build, not during it.
- An orchestration layer (such as a BPM/workflow engine) that owns the end-to-end lifecycle across underlying systems.
- API-based integration that eliminates re-keying and lets data flow across onboarding, review, and screening.
- A modular design that allows new products, segments, and channels to be added incrementally without re-architecture.

OBSERVED FAILURE MODES

- Deferring the systems-of-record question until integration decisions land on the critical path.
- Embedding workflow logic inside individual applications instead of in a dedicated orchestration layer.
- Accumulating point solutions without an integration strategy, so complexity compounds with every addition.
- Mistaking digitization of individual steps for integration of the lifecycle.

REGULATORY HOOK

FINMA lens - FINMA Circular 2023/1 on operational resilience requires that critical processes - including client lifecycle workflows - be resilient end-to-end. A fragmented architecture with manual handoffs is difficult to evidence as resilient. Swiss data-sovereignty and nDSG obligations further shape where and how lifecycle data may be processed.

MATURITY SIGNPOSTS

L1 Baseline	L2 Digitized	L3 Integrated	L4 Orchestraded	L5 Intelligent
Fragmented point systems, manual handoffs, pervasive re-keying, no orchestration layer.	Individual systems digitized, some interfaces, but integration is partial and workflow logic is scattered.	Systems of record defined and connected; API-based data flow; an orchestration layer owns the end-to-end journey.	Event-driven orchestration across the lifecycle; modular, extensible architecture; resilient by design.	AI-ready architecture with governed model integration; data foundation supports continuous, intelligent processing.

Table 7 - Maturity ladder for Dimension 5 - Technology & Architecture

Dimension 6 Governance & Operating Model

2.7. Dimension 6 - Governance & Operating Model

The final dimension is the one that most reliably determines whether the other five succeed. It covers ownership clarity, decision rights, the three lines of defense, and whether accountability for the lifecycle is real or merely diagrammed.

THE PAIN TODAY

Governance-by-committee is the dominant failure pattern. Ownership of the lifecycle is distributed across the front office, operations, compliance, and IT, with no single accountable owner empowered to resolve trade-offs between compliance strictness, operational efficiency, and client experience. Decisions are slow, conflicts go unresolved, and delivery satisfies no stakeholder group fully. The seams between functions - the same seams where regulatory and operational risk concentrate - are precisely the places no one owns.

WHAT GOOD LOOKS LIKE

- A named, single accountable owner for the client lifecycle, with real decision rights and a named, single accountable owner for the client lifecycle, with real decision rights and executive standing. That accountability sits in the first line and does not replace independent second-line oversight or third-line assurance.Compliance embedded as a design partner from inception - participating in workflow design, not consulted at review gates.
- A defined target operating model with clear RACI across front office, operations, compliance, and IT.
- Three lines of defense built into the workflow, with second-line oversight designed in rather than bolted on.

OBSERVED FAILURE MODELS

- Distributing ownership across committees so that no individual can resolve a trade-off or close an open item.
- Treating compliance as a late-stage approval gate, generating expensive retrofitting and rework.
- Defining the operating model after the solution architecture, forcing workflows to be re-engineered to match responsibilities never agreed.
- Managing the lifecycle without shared KPIs, so no function sees the whole and the seams stay invisible.

REGULATORY HOOK

FINMA lens - FINMA expects clear governance and three-lines-of-defense discipline as a baseline supervisory condition. Where ownership is diffuse, supervisors find it; governance gaps are a leading indicator of the control failures that follow. Compliance co-design generates compliance by default - retrospective review generates rework.

MATURITY SIGNPOSTS

L1 Baseline	L2 Digitized	L3 Integrated	L4 Orchestraded	L5 Intelligent
Diffuse ownership, governance-by-committee, compliance consulted late, no shared lifecycle KPIs.	Some documented roles and processes, but accountability still distributed and compliance largely a review gate.	A named owner with decision rights; defined operating model and RACI; compliance engaged in design.	Lifecycle governed as one orchestrated operating model; second line designed into workflows; shared KPIs across functions.	Data-driven governance with real-time lifecycle KPIs; continuous control monitoring; governance keeps pace with AI deployment.

Table 8 - Maturity ladder for Dimension 6 - Governance & Operating Model

3. Reading the matrix: from scores to a sequenced roadmap

Scoring each of the six dimensions against the five-level ladder produces a maturity profile: a single picture of where the client lifecycle is strong, where it is exposed, and where further investment is likely to have the greatest impact. The profile is not a scorecard for its own sake. Its purpose is to answer the three questions a Chief Risk Officer, Chief Compliance Officer and Chief Operating Officer have to answer together – what must be fixed because a deadline says so, what must be built because everything else depends on it, and what can be deliberately left alone. This chapter sets out the principles that turn a profile into a sequence, then works through the outcome of one bank's assessment to show how the same logic identifies the best value for money.

3.1. Three Principles for Sequencing

1

Principle 1 - Governance and Architecture are enablers

Dimensions 5 (Technology & Architecture) and 6 (Governance & Operating Model) are foundational. A bank that is weak on either will struggle to make durable progress on the other four, because improvements to onboarding, review, screening, and regulatory change all depend on a place to orchestrate them and a clear owner to decide trade-offs. A bank can contain short-term regulatory risk through interim controls, but it will not make durable progress across the lifecycle without these foundations. Where these two lag the others, they usually come first.

2

Principle 2 - Follow the regulatory forcing functions

Where two dimensions are equally weak, the regulatory calendar breaks the tie. With revised AMLA in force on 1 October 2026 and the FATF cycle running through 2027–2028, gaps in KYC/AML Compliance, Periodic Review and Regulatory Change Management carry a time-bound risk that discretionary improvements do not. Non-discretionary, deadline-bound gaps require immediate risk containment and should be addressed in parallel with the Governance and Architecture work needed to resolve their underlying causes sustainably.

3

Principle 3 - Prioritise Level 3 integration before selectively advancing to Levels 4 and 5

For many institutions, the Integrated level (3) can deliver a substantial share of the commercial and compliance return, without the data-governance prerequisites that Intelligent (5) demands. Programs that reach for AI-enabled maturity before establishing integration and orchestration risk creating AI-governance weaknesses that regulators such as FINMA are increasingly alert to. For most institutions, the right near-term target across the lifecycle is a consistent Level 3, underpinned by established governance, architecture and data controls. Level 4 orchestration should be added selectively where volume or use-case complexity justifies it, while Level 5 should be reserved for dimensions with a proven data foundation and control framework.

3.2. An Illustrative Read-Off: from Profile to Action

The profile below illustrates how the framework translates a maturity profile into action. While every bank's profile will differ, the three sequencing principles provide a consistent basis for prioritising immediate action, foundational improvement and selective optimisation.

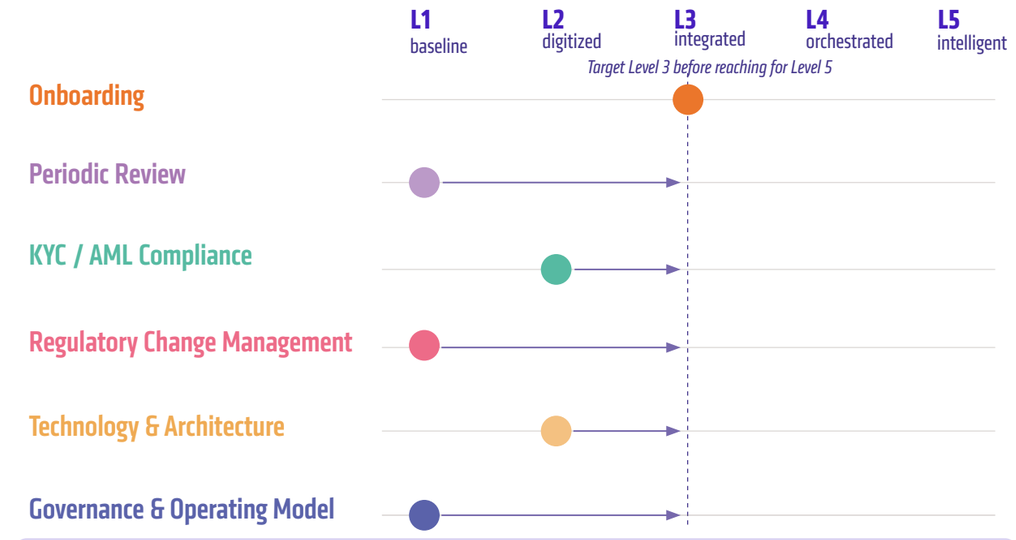


Figure 1 -Worked example: one bank's maturity profile across the six dimensions

The scores alone do not produce a priority. What produces it is the profile read through the three principles above – each dimension tested against them in turn, which places it in one of three groups and settles what it is worth spending on next.

How the sequence is derived

Principle 1

Governance & Operating Model (L1) and Technology & Architecture (L2) are the foundational dimensions. Establishing clear end-to-end accountability and a shared orchestration layer enables coordinated improvement in Periodic Review, KYC/AML Compliance and Regulatory Change Management–so investment in these foundations can address multiple lifecycle gaps at once.

➔ **Build durable foundations - in parallel, sequenced first**

Principle 2

Periodic Review (L1), Regulatory Change Management (L1) and KYC/AML Compliance (L2) are all below target and all carry a date: revised AMLA on 1 October 2026 and the FATF cycle through 2027–2028. The deadline breaks the tie against equally weak but discretionary gaps.

➔ **Contain deadline-driven risk – now, on the regulatory calendar**

Principle 3

Keep Onboarding at L3 for now, prioritizing other dimensions. Include the integration and data-quality changes needed to enable Periodic Review, KYC/AML, and lifecycle orchestration.

➔ **Hold Onboarding; treat Level 4 and 5 as a horizon, not a phase**

Applied to the six scores, this logic produces two linked workstreams and a clear near-term horizon:

Contain deadline-driven risk
Urgent remediation stream

Now • Regulatory calendar

L1 → L3	Periodic Review	Backlog is a live supervisory risk under revised AMLA. Establish integrated data assembly and risk-based review scheduling.
L1 → L3	Regulatory Change Management	No regulation-to-process mapping exists; every major regulatory change becomes a fire drill without one.
L2 → L3	KYC / AML Compliance	Fix entity resolution and data quality; reduce false positives.

↑ Foundations progressively remove the root causes of the backlog

Build durable foundations
Foundations stream

Start in parallel • Establish early

L1 → L3	Governance & Operating Model	Name a single accountable owner before launching any build, or the rest will be inconsistently governed.
L2 → L3	Technology & Architecture	Establish the shared integration, workflow and data foundations needed for coordinated progress in Review, KYC/AML and Regulatory Change Management

↓ The same foundations are what make the next levels reachable

Then - what target unlocks
Future progression area

Horizon • Earned, not skipped

L3 → L4	Lifecycle orchestration	Triggers propagate automatically across onboarding, review and screening exceptions are routed, not chased
L3 → L4	Change propagation	A logged obligation drives scoped change-lists across affected dimensions, with closed-loop evidence
L4 → L5	Continuous KYC	AI-assembled review packages, predictive prioritization and real-time lifecycle KPIs

Level 5 is earned the data governance of Level 3 and the orchestration of Level 4 - never skipped to

L3 • hold	Onboarding	At the illustrative near-team target. Absorbs only the integration and data-quality changes the wider lifecycle requires; extend to level 4 only if volume or usecase complexity justifies it.

Figure 2 - The maturity profile resolved into two linked workstreams and a horizon.

The illustrative profile translates into two linked workstreams: contain material regulatory and operational exposure where urgency is highest, while building the governance, data and integration foundations required for sustainable improvement. Client Onboarding remains at the illustrative near-term target. From this Level 3 base, selected dimensions may progress towards Level 4 orchestration and, where justified by proven data and controls, Level 5 intelligent capability.

4. Establishing your position: the CLM Maturity Assessment

A framework is only useful once a bank knows where it actually sits within it. Producing an honest, evidence-based six-dimension profile is harder than it appears from the inside: self-assessment tends to overrate the dimensions a bank has invested in and under-examine the seams between functions, which is exactly where the framework finds the costliest gaps.
adesso Schweiz offers a structured CLM Maturity Assessment built directly on this framework. It is a focused, two-week diagnostic, accelerated using adesso's sovereign AI-supported review tooling, delivered to a bank's risk, compliance, and operations leadership. It combines senior interviews across the three lines of defense with a structured, AI-supported review of the current-state lifecycle, and it produces a board-ready output: a maturity scorecard across all six dimensions, a positioning of the bank relative to regulatory expectations and observed Swiss market practice, the top five remediation priorities with an indicative business case, and a sequenced roadmap built on the read-off logic above.
Its purpose is not to sell a transformation; it is to give the CRO, CCO, and COO a shared, defensible picture of the lifecycle they are jointly accountable for - the picture from which any sensible decision, including the decision to do nothing for now, can be made.

5. Conclusion: Manage the Lifecycle, Not the Stage

Client Lifecycle Management in Swiss banking is a strategic priority not because any single stage is glamorous, but because the lifecycle as a whole is where regulatory obligation and commercial opportunity converge - and where the gaps between functions quietly accumulate the risk that surfaces, eventually, as an enforcement finding or a lost client. The six-dimension framework exists to make those gaps visible and to turn a diffuse ambition to modernize into a prioritized, evidence-based sequence. The path is well understood. The risks are knowable. What distinguishes successful programs is not technology sophistication alone, but discipline: a single accountable owner, compliance as a design partner, an architecture that orchestrates rather than fragments, and the judgment to sequence Governance and Architecture early where they lag. The framework does not replace that judgment - it equips it.

> Regulatory confidence enables sustainable commercial velocity.
> Embedded controls help banks move faster, more consistently and within their risk appetite.

Sources

• Fenergo, KYC & Onboarding Trends 2024 (global survey of 450+ C-suite executives at corporate, institutional, and commercial banks): 67% of banks reported losing clients to slow or inefficient onboarding, up from 48% in 2023. Fenergo's 2025 Financial Crime Industry Trends Report subsequently put this figure at 70% (survey of 600 senior decision-makers across banks, asset managers, and fund administrators, conducted August 2025).

• McKinsey & Company, „How agentic AI can change the way banks fight financial crime" (2024): banks commonly assign up to 10–15% of full-time equivalents to KYC/AML, while the financial industry detects only about 2% of global financial-crime flows (the 2% figure attributed by McKinsey to Interpol).

• Swiss regulatory references: FINMA Circular 2016/7 (Video and Online Identification); FINMA Circular 2023/1 (Operational Resilience); the revised Anti-Money Laundering Act (AMLA) and the Legal Entities Transparency Act (LETA); FinSA (FIDLEG); the revised Swiss Data Protection Act (nDSG); the Swiss Bankers Association's Agreement on the Swiss banks' code of conduct with regard to the exercise of due diligence (CDB 20, in force since 1 January 2020) and the FINMA Anti-Money Laundering Ordinance (AMLO-FINMA), both undergoing revision in step with the AMLA/LETA reform (SBA: revised CDB and commentary expected 1 January 2027 at the earliest); FINMA Circular 2025/2 (Rules of Conduct under FinSA/FinSO, in force 1 January 2025); FINMA Guidance 05/2025 on operational resilience (published 10 November 2025, based on a survey of 267 institutions as of 31 December 2024); the Federal Council's statement of 12 June 2026 setting the AMLA/LETA entry-into-force date; and the FATF mutual evaluation cycle 2027–2028.

About adesso Schweiz

adesso combines technological expertise with in-depth industry know-how. Our work is based on strong customer focus and flexibility, on AI-based methods in the implementation of software projects, on close links between research, teaching, and practice, and on an open corporate culture. adesso Schweiz AG is part of the adesso Group, which, with a team of more than 11,000 employees at numerous locations around the world, works every day to successfully bring its customers' projects to their destination.
Our banking practice specializes in Client Lifecycle Management transformation, regulatory compliance delivery, and an AI-built, expert-enhanced delivery model - primarily for Swiss private and cantonal banks, and secondarily for international wealth hubs. We operate across Switzerland's full banking landscape - tier-1 universal banks, cantonal banks, private banks, and asset managers - with deep familiarity with FINMA's regulatory perimeter and Swiss banking operating-model norms.

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