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the Financial System of the 21<sup>st</sup>  
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# **Future Impact of Tokenization and AI on Financial Services**



## Promise and Pitfalls of Tokenization

- Why tokenization?
  - Improved efficiency: liquidity, accuracy, speed
  - Expanded features: fractionalization, smart contracts
  - Tokenization as infinitely flexible wrapper for any asset
- Why not tokenization?
  - Current system works and infrastructure in place around the world
  - Concerns over money laundering, crime facilitation, tax evasion
  - Unresolved questions of operational risk and accountability
  - Intermediation provides benefits, including legal enforcement and reversibility



## Necessary Conditions for Growth of Tokenization

- Tokenized money
  - Allows fast settlement, bridge between trad-fi and digital
  - Programmable money may address concerns over atomic settlement, Herstatt risk, etc.
  - Investors need certainty that tokenized money will hold value under stress – role of regulation
  - Future of tokenized money to be contested among stablecoin, tokenized deposits, CBDC (though not in U.S.)
  - EU was a first mover with legislation, but UK and U.S. moving rapidly to implementation of new laws (GENIUS Act in U.S.)
- Practical challenges to wider use of tokenized money
  - Implementing legal framework for responsibility
  - On-ramps and off-ramps to address regulators' AML/KYC concerns
  - Interoperability is paramount to unify system
    - Across blockchains, across banks (tokenized deposits), across borders



## Challenges for Regulation

- Protecting investors and market participants
  - Reg NMS has served investors well in trad-fi; must extend equivalent protections to token owners
  - Who should be regulated – issuers, protocol authors, intermediaries?
  - Should issuers have control over tokenization?
    - Some tokenized ETFs already being marketed by SPVs rather than issuers
- Overcoming fragmentation
  - Some of biggest potential benefits are in easing cross-border
  - Significant differences between EU, UK, U.S. (& U.S. state) regulation
  - Will differing standards choke off innovation or drive regulatory race to the bottom?
- Financial stability concerns
  - Could enable faster contagion at any time – need for 24/7 monitoring and bank resolution capability
  - Currency stability
    - USD, EUR, GBP likely to benefit from inflows
    - Could enable rapid outflows from developing economies with high inflation and/or capital controls



## AI in Finance

- Current status and emerging use-cases
  - Already widely used in finance
    - Customer relations and robo-advising
    - Research: automating tasks, tapping potential of unstructured data
    - Detecting abuses by both FIs and supervisors: AML, KYC, insider trading
  - Emerging use-cases
    - Credit evaluation
    - Reporting and compliance (e.g., prospectuses)
    - Cyber security and incident reporting
- Role of humans in the loop
  - Principle has been that humans make critical decisions
    - Seeing reduced role of humans in many cases, inc. credit decisions
  - Changing nature of work in finance leading to job cuts (though in LR, new jobs may arise)
  - Key question for FIs, regulators, supervisors: where are the guardrails?
  - Companies and financial institutions must have robust internal governance and controls on AI



## Regulation of AI in Finance

- Regulatory divergence between U.S. and Europe
  - U.S.: permissive in principle, regulate by function
  - EU: direct regulation of AI (AI Act)
  - Will regulatory divergence lead to fragmentation?
  - Potential impact of economic security and data privacy concerns may exacerbate fragmentation
- Fundamental challenges of regulating AI, data storage
  - Is it even feasible for regulation to keep up with tech change?
  - Principles-based system with institutionalized communication and cooperation between industry, regulators, supervisors most likely to deal effectively with the challenges of rapid tech growth and strains on existing regulatory systems



# **Future of Public and Private Capital Markets**



## **Growth of Private Markets in U.S.**

- Private markets as growing part of diverse ecosystem
  - Functional differentiation based on size, industry, stage
  - Downsides of public markets: compliance, reporting, litigation risk
  - Rise of private investors with long time horizons
    - Institutional investors: pensions, universities, life insurers
    - High net-worth individuals and family offices
  - Excess returns in private markets
    - But will this continue as private markets expand? And can current fee structures hold?
- Retail access as key policy debate
  - Pluses: opportunities for higher returns, including VC stage
  - Minuses: illiquidity, non-transparency, concerns over pricing
  - Should retail have unfettered access or limited to DC pensions?
  - How to regulate trading and pricing as retail role grows?



## Private Markets in Europe

- Europe has also seen growth of private markets
  - Most companies are private, but bank-based financial system limits them
  - Private markets expanding, albeit much slower than in U.S.
- Rationale for promoting private markets in Europe
  - Need to shift saving to investment to promote economic growth, address rising investment needs
  - Relative weakness of start-up and growth-phase financial ecosystem
  - Concerns that local high-growth firms are turning to U.S. markets for funding
- PISCES as innovation to bridge public and private

## Private Credit

- Why private credit?
  - Banks have receded since GFC due to regulation, capital reqs
  - Does rise of private credit reflect risk migration or expanding credit opportunities?
  - Borrowers: bespoke and flexible, access to long-term predictable finance
  - Investors: maturity and risk matching, lower compliance costs outside bank regulatory perimeter, higher interest rates and returns
- Concerns over growth of private credit
  - Quality of credit evaluation, valuation over course of credit cycle
  - Systemic effects
    - May be stabilizing: LPs can lose money without contagion effects
    - But what are interconnections, including bank lending and use as collateral?
  - Lack of visibility is increasing concern for regulators

## Improving Attractiveness of Public Markets

- Benefits of public markets
  - Investors gain liquidity, price discovery, transparency
  - Companies improve access to funding at lower cost
- Reducing costs
  - Reporting requirements are seen as onerous, often irrelevant
  - Procedures such as proxy voting are expensive logistical challenges – is there a way to simplify?
  - In U.S., shareholder-derivative suits drive litigation risk
- Improving data
  - EU consolidated tape is still a work in progress – data is costly and fragmented; system benefits exchanges and systemic internalizers at expense of investors
  - Data gathering should be rationalized, made more automatic, focus on materiality rather than box-checking



# UPCOMING EVENTS

2026

**China - U.S. Symposium**

*October 21-23, Beijing*

**Japan - U.S. Symposium**

*November 19-21, Boston*

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