OpusDatum Risk register · extract

One risk, published in full and verbatim. Context, method and the withholding policy: see the companion note, ‘About the OpusDatum Risk register’. Register snapshot: 21 September 2026. The register is a living artefact; identifiers and records evolve as adjudication continues.

The risk record

The register's record for the published risk, field by field, then its pointers into the tables below; each row is glossed beneath its label.

Identifier The register's reference for this risk	**R-ORIGINATOR-INFO-VERIFICATION-FAILED**
Designation The appetite class the adjudication assigned	**‘strict’ · one of the 23 strict designations · Articles 4 and 14**
Description The risk, as the register states it	Risk that the originator's PSP or originator's CASP dispatches a transfer without having validly established the accuracy of the Article 4(1) / 14(1) (and, where applicable, Article 4(3) / 14(3)) originator information before transfer, on the basis of documents, data or information obtained from a reliable and independent source. This may arise by omission, partial scope, non-reliable / non-independent source, stale evidence, late timing, wrong-record matching, failed-treated-as-passed gating inversion, missing audit trail, wrong-actor allocation (direct debit).
Objective protected What the Regulation is trying to achieve; the risk defeats it	Preventing, detecting and investigating money laundering and terrorist financing. This is achieved by ensuring that the originator information accompanying a transfer is accurate and verified against reliable independent evidence before dispatch.
Sources (7) The conditions that can give rise to the risk	RS-RELIABLE-INDEPENDENT-SOURCE-SELECTION-GAP · RS-ORIGINATOR-DATA-STALENESS · RS-PRE-TRANSFER-GATING-PROCESS-GAP · RS-DIRECT-DEBIT-ROLE-ALLOCATION-AMBIGUITY · RS-VERIFICATION-EVIDENCE-RETENTION-GAP · RS-VERIFICATION-AUDIT-TRAIL-LINKAGE-GAP · RS-VERIFICATION-SCOPE-CONFIGURATION-GAP
Events (10) The occurrences that realise it	E-VERIFICATION-NOT-PERFORMED · E-VERIFICATION-SCOPE-PARTIAL · E-VERIFICATION-EVIDENCE-STALE · E-VERIFICATION-POST-DISPATCH · E-VERIFICATION-FAILED-TREATED-AS-PASSED · E-DEEMING-INVOKED-ON-WRONG-CUSTOMER-RECORD · E-VERIFICATION-AUDIT-TRAIL-ABSENT · E-DIRECT-DEBIT-VERIFICATION-WRONG-ACTOR · E-VERIFICATION-AGAINST-NON-RELIABLE-SOURCE · E-VERIFICATION-AGAINST-NON-INDEPENDENT-SOURCE
Consequences (5) What follows when it materialises	C-ORIGINATOR-INFO-INACCURACY-PROPAGATED · C-AML-CTF-TRACEABILITY-DEFEATED · C-VERIFICATION-EVIDENCE-UNAUDITABLE · C-TRAVEL-RULE-SUPERVISORY-ENFORCEMENT · C-ORIGINATOR-IDENTITY-ACCURACY-NOT-ESTABLISHED
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Withheld layers Engagement material, deliberately unpublished	Adjudication rationale · executable rules · calibration

Table 1 · Obligations

The duties in the Regulation this risk attaches to, with the duty text as the register holds it.

Obligation	Reference	Duty
Verification of originator information against a reliable source before transfer OB-EU-2023-1113-ART-4-4	EU 2023/1113 Article 4(4)	Before transferring funds, the payment service provider of the payer shall verify the accuracy of the information referred to in paragraph 1 and, where applicable, in paragraph 3, on the basis of documents, data or information obtained from a reliable and independent source.
Verify accuracy of originator information before transferring OB-EU-2023-1113-ART-14-6	EU 2023/1113 Article 14(6)	Before transferring crypto-assets, the crypto-asset service provider of the originator shall verify the accuracy of the information referred to in paragraph 1 on the basis of documents, data or information obtained from a reliable and independent source.

Table 2 · Relief routes audited within this risk (3)

Article 4(5) and Article 14(7) deem the verification in Table 1 to have taken place on stated conditions. A relief route is not a duty of its own; it is a satisfaction path for one, so wrongly invoking it is a failure of the duty it relieves. The register therefore catalogues these routes in full and adjudicates them not-key, audited inside this risk (method v3 rule 2). Between them they carry 31 non-compliance modes.

Relief route	Provisions	Adjudication
Originator-side CDD deeming wrongly invoked R-ORIGINATOR-CDD-DEEMING-WRONGLY-INVOKED	EU 2023/1113 Article 4(5)(a) EU 2023/1113 Article 14(7)(a)	Not key: 12 modes, audited within this risk
Originator-side existing-customer CDD deeming wrongly invoked R-ORIGINATOR-DEFERRED-CDD-DEEMING-WRONGLY-INVOKED	EU 2023/1113 Article 4(5)(b) EU 2023/1113 Article 14(7)(b)	Not key: 10 modes, audited within this risk
Originator-side verification deeming wrongly invoked R-ORIGINATOR-VERIFICATION-DEEMING-WRONGLY-INVOKED	EU 2023/1113 Article 4(5) EU 2023/1113 Article 14(7)	Not key: 10 modes, audited within this risk

Table 3 · Non-compliance modes (12: the complete set)

Each mode is one distinct, testable way the duty fails. Under each title: the mode's register identifier, then the obligations it applies to.

Mode	Regime	Description
Verification performed against a non-independent source NCM-ORIGINATOR-INFO-VERIFICATION-AGAINST-NON-INDEPENDENT-SOURCE OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	Verification is performed against material that is not independent of the originator. Examples include self-attestation by the originator, an originator-supplied document being verified against itself, or a source under the originator's control.
Verification performed against a non-reliable source NCM-ORIGINATOR-INFO-VERIFICATION-AGAINST-NON-RELIABLE-SOURCE OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	Verification is performed against material that is not reliable. Examples include unauthenticated customer-supplied documents, unverified third-party assertions, and sources of known low evidentiary quality.
Verification matched to the wrong customer record NCM-ORIGINATOR-INFO-VERIFICATION-AGAINST-WRONG-RECORD OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	Verification is performed against the customer record of a different person than the originator that actually initiated the transfer. This is a wrong-identity record match — for example, by namesake collision or stale account-holder mapping.

Mode	Regime	Description
Missing audit trail for originator-information verification NCM-ORIGINATOR-INFO-VERIFICATION-AUDIT-TRAIL-MISSING OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	No retained record of the documents, data or information that underpinned the verification exists. As a result, the PSP or CASP cannot evidence that verification was performed on a reliable-and-independent basis.
Verification evidence no longer supports the accuracy assertion at dispatch NCM-ORIGINATOR-INFO-VERIFICATION-EVIDENCE-NOT-CURRENT-AT-DISPATCH OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	At the moment of the transfer, the documents, data or information underpinning the verification no longer support the accuracy assertion about the originator information being sent. Typical triggers are a post-name-change, post-relocation or post-restructuring situation where the customer master carries the new value and the retained evidence supports only the old one. Article 4(4) requires the accuracy of the information accompanying THIS transfer to be verified, so an evidentiary basis that no longer supports it leaves the duty undischarged rather than degraded.
Verification evidence stale at time of transfer NCM-ORIGINATOR-INFO-VERIFICATION-EVIDENCE-STALE OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	Verification is performed against documents, data or information whose age has drifted beyond the PSP's own documented currency threshold, while still supporting the accuracy assertion. Typical triggers are a refresh cycle running late or an evidence set approaching its stated validity limit. The duty is satisfied imperfectly: the basis is degraded, not defeated.
Failed originator-information verification treated as passed NCM-ORIGINATOR-INFO-VERIFICATION-FAILED-TREATED-AS-PASSED OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	The verification outcome is a failure, either because of a mismatch with the reliable-and-independent source or because accuracy cannot be evidenced. However, the dispatch-gating logic treats it as passed and releases the transfer.
Originator information not verified before transfer NCM-ORIGINATOR-INFO-VERIFICATION-NOT-PERFORMED OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	No pre-transfer verification of the originator information is performed. The transfer is dispatched with the Article 4(1) / 14(1) information — and, where applicable on a transfer of funds, the Article 4(3) information — unverified against any source.
Verification recorded only after the transfer is dispatched NCM-ORIGINATOR-INFO-VERIFICATION-POST-DISPATCH OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	Verification is recorded only after the transfer has already been dispatched. This breaches the 'before transferring funds' / 'before transferring crypto-assets' timing precondition.
Information omitted from verification scope NCM-ORIGINATOR-INFO-VERIFICATION-SCOPE-OMITS-PARA-3-WHEN-APPLICABLE OB-EU-2023-1113-ART-4-4	funds	The transfer is one where Article 4(3) applies — it is not made to or from a payment account, so a unique transaction identifier is required. The verification nevertheless omits the Article 4(3) information from its scope.
Partial-scope verification of article 4(1) / 14(1) data elements NCM-ORIGINATOR-INFO-VERIFICATION-SCOPE-PARTIAL-PARA-1 OB-EU-2023-1113-ART-4-4, OB-EU-2023-1113-ART-14-6	both	Verification is performed against only a subset of the Article 4(1) / 14(1) data elements. For example, name may be verified but account number not, or the address branch may be verified but not the LEI when one is present. Some required information is therefore left unverified.

Mode	Regime	Description
Wrong actor verifies beneficiary information for direct debit NCM-ORIGINATOR-INFO-VERIFICATION-WRONG-ACTOR-FOR-DIRECT-DEBIT OB-EU-2023-1113-ART-4-4	funds	For a direct-debit collection, the verification under Article 4(4) is allocated to the originator's PSP under the default rule, or omitted altogether. It should instead be allocated to the beneficiary's PSP, which must verify the beneficiary information before sending the collection, contrary to EBA §4.9 ¶92(b).

Table 4 · Linked controls (20: the complete set)

The controls the register links to this risk, as titles and descriptions; the executable form each control takes is engagement material. Of these 20 controls, 14 apply to both rails, 3 to funds transfers only, and 3 to crypto-asset transfers only.

Control	Regime	Description
Consumer-to-consumer carve-back rule CTRL-CONSUMER-TO-CONSUMER-CARVE-BACK-RULE	funds	Pre-dispatch decisioning rule that operates within the card/instrument/device exemption pathway. It returns consumer-to-consumer non-trade transfers to scope by applying the consumer carve-back, so originator-information is populated rather than omitted. Anchored in: EU 2023/1113 Article 2(3) — card/instrument/device exemption with consumer-to-consumer carve-back
Crypto-exemption determination rules CTRL-CRYPTO-EXEMPTION-DETERMINATION-RULES	crypto	Codified pre-dispatch decisioning rules at the originator's CASP that test the cumulative conditions of each Article 2(4) crypto exemption against the candidate transfer. The exemptions covered are both-CASPs-acting-on-own-behalf and person-to-person without a CASP, and the rules must be satisfied before the Article 14(1) accompaniment duty is treated as disengaged. Anchored in: EU 2023/1113 Article 2(4) — crypto exemptions; EBA/GL/2024/11 §4.2 ¶15 — exclusion/derogation determination policy hygiene
Originator verification outsourcing clauses and SLAs CTRL-CRYPTO-ORIGINATOR-VERIFICATION-OUTSOURCING-CLAUSES	crypto	Contractual clauses and SLAs at the originator's CASP covering Travel-Rule-solution, wallet, agency, and KYC-vendor arrangements. These provisions allocate liability for Article 14(6) verification defects. They also require the service provider to perform equivalent pre-dispatch, reliable-and-independent-source verification with retained audit trail on crypto-asset transfers originated on the CASP's behalf. Anchored in: EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Direct-debit verification role routing to beneficiary PSP CTRL-DIRECT-DEBIT-VERIFICATION-ROLE-ROUTING	funds	Pre-collection routing rule that, for transfers classified as direct-debit collections, allocates the Article 4(4) verification duty to the beneficiary's PSP on the beneficiary information. It blocks send of the collection without a recorded beneficiary-side verification event. Anchored in: EBA/GL/2024/11 §4.9 ¶92(b) — direct-debit role inversion of the Article 4(4) verification duty
Post-dispatch exemption classification audit CTRL-EXEMPTION-CLASSIFICATION-POST-DISPATCH-AUDIT	both	Periodic post-dispatch audit that joins exemption-classification logs against transfer messages and against counterparty, channel, and purpose evidence. It detects exemptions wrongly claimed or carve-backs missed. Anchored in: EU 2023/1113 Article 2 — exemption scope conditions
Exemption determination rules CTRL-EXEMPTION-DETERMINATION-RULES	both	Codified pre-dispatch decisioning rules that determine whether an Article 2 exemption applies to a given transfer by testing each exemption's cumulative conditions. The exemptions listed here are the Regulation's own, not this register's: card/instrument/device (2(3), which reaches electronic money tokens and is why this control spans both regimes), cash withdrawal from own account, tax/fines/levies to public authority, PSP-on-own-behalf and cheque-image exchange (2(4)), and the Member-State low-value derogation (2(5)). The 2(4) crypto limbs are tested by CTRL-CRYPTO-EXEMPTION-DETERMINATION-RULES. Anchored in: EU 2023/1113 Article 2 — exemptions and Member-State derogation governing the scope of Article 4(1) / 14(1)

Control	Regime	Description
Pre-dispatch verification gate for originator information CTRL-ORIGINATOR-INFO-PRE-DISPATCH-VERIFICATION-GATE	both	Deterministic dispatch-gating rule that blocks release of the outbound transfer unless a verification event is bound to the transfer record. The bound event must have a successful outcome and a timestamp strictly prior to dispatch. Anchored in: EU 2023/1113 Article 4(4) — 'Before transferring funds … shall verify'; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Own-behalf exemption counterparty classification check CTRL-OWN-BEHALF-EXEMPTION-COUNTERPARTY-CLASSIFICATION-CHECK	both	Pre-dispatch check at the originator's PSP or CASP that, before invoking the both-parties-acting-on-own-behalf exemption, verifies that the counterparty is in fact a PSP or CASP and is acting on its own behalf rather than for a customer. The check draws on the firm's counterparty classification register and exemption-invocation log. Anchored in: EU 2023/1113 Article 2(4) funds (c) — both-PSPs-acting-on-own-behalf condition; EU 2023/1113 Article 2(4) crypto (a) — both-CASPs-acting-on-own-behalf condition
Person-to-person exemption CASP-involvement check CTRL-P2P-NO-CASP-EXEMPTION-CASP-INVOLVEMENT-CHECK	crypto	Pre-dispatch check at the originator's CASP that, before invoking the person-to-person-without-a-CASP exemption, verifies that no CASP is in fact handling the transfer for a party. The check draws on transfer-routing and exemption-invocation logs. Anchored in: EU 2023/1113 Article 2(4) crypto (b) — person-to-person-without-a-CASP condition
Reliable-and-independent source catalogue with dispatch gating CTRL-RELIABLE-INDEPENDENT-SOURCE-CATALOGUE-AND-GATING	both	Curated catalogue of source types pre-classified as satisfying the reliable-and-independent conjuncts for Article 4(4) (Article 14 for crypto-asset transfers) verification. A dispatch-time gate permits a verification event to satisfy the duty only where the source used is recorded on the catalogue. Anchored in: EU 2023/1113 Article 4(4) — 'documents, data or information obtained from a reliable and independent source'; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Verification audit trail retention CTRL-VERIFICATION-AUDIT-TRAIL-RETENTION	both	Per-verification retained record that captures the source used, the data elements verified, the outcome, the timestamp, and the link to the transfer reference. The record is retained so each Article 4(4) (Article 14 for crypto-asset transfers) verification can be evidenced ex post. Anchored in: EU 2023/1113 Article 4(4) — evidenceability of the verification basis; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Verification defect metrics dashboard CTRL-VERIFICATION-DEFECT-METRICS-MONITORING	both	Management-information dashboard tracking verification-defect rates by mode and surfacing residual risk to senior management. Modes tracked include not-performed, partial-scope, non-reliable / non-independent source, stale evidence, wrong-record match, post-dispatch timing, fail-treated-as-pass, audit-trail-missing, direct-debit role error, and exemption misuse. Anchored in: EU 2023/1113 Article 4(4); EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Verification evidence age threshold check CTRL-VERIFICATION-EVIDENCE-AGE-THRESHOLD-CHECK	both	Pre-dispatch check that computes the interval between the date of the underpinning verification evidence and the transfer timestamp. It blocks dispatch where the interval exceeds the firm's documented maximum evidence age for that evidence type. Anchored in: EU 2023/1113 Article 4(4) — accuracy at the time of transferring; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Failed verification outcome blocks dispatch CTRL-VERIFICATION-FAIL-OUTCOME-BLOCKS-DISPATCH	both	Dispatch-gating rule that consumes the verification outcome as a typed pass/fail signal and prevents any code path from coercing a fail into a pass. Failed verifications hold the transfer in a non-dispatchable state pending remediation. Anchored in: EU 2023/1113 Article 4(4) — verification predicate must succeed before dispatch; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP

Control	Regime	Description
Outsourcing contractual clauses for verification CTRL-VERIFICATION-OUTSOURCING-CLAUSES	funds	Contractual clauses and SLAs in outsourcing, agency, and correspondent arrangements that allocate liability for Article 4(4) verification defects. They require the service provider to perform equivalent pre-dispatch, reliable-and-independent-source verification with a retained audit trail on transfers it originates on the firm's behalf. Anchored in: EU 2023/1113 Article 4(4) — verification duty borne by the payer's PSP
Verification policy and staff training CTRL-VERIFICATION-POLICY-AND-TRAINING	both	Documented policy and staff training establishing the firm's standard for Article 4(4) (Article 14 for crypto-asset transfers) verification, binding the verification and dispatch layers to those standards. The standard covers reliable-and-independent source selection, scope across Art 4(1)/(3) (Art 14(1) for crypto-asset transfers), pre-dispatch timing, record-identity matching, fail-blocks-dispatch outcome integrity, audit-trail retention, and direct-debit role allocation. Anchored in: EU 2023/1113 Article 4(4); EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP; EBA/GL/2024/11 §4.9 ¶92(b); EBA/GL/2024/11 §4 — policy and procedures for the PSP of the payer
Post-dispatch sampling review of verification CTRL-VERIFICATION-POST-DISPATCH-SAMPLING-REVIEW	both	Periodic sampling review of retained outbound transfers that reconciles each transfer's verification event against the Article 4(4) (Article 14 for crypto-asset transfers) specification. The reconciliation covers presence of the event, scope coverage of Art 4(1)/4(3), source reliability and independence, evidence age, record-identity match, pre-dispatch timing, outcome integrity, audit-trail completeness, and direct-debit role allocation. Anchored in: EU 2023/1113 Article 4(4); EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP; EBA/GL/2024/11 §4.9 ¶92(b)
Verification record identity match check CTRL-VERIFICATION-RECORD-IDENTITY-MATCH-CHECK	both	Pre-dispatch reconciliation that asserts the customer record against which verification was performed is the record of the originator that authenticated and initiated the transfer. It blocks dispatch where the verified record's identifier does not match the initiator's. Anchored in: EU 2023/1113 Article 4(4) — verification of the information of THIS payer; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Verification scope coverage check CTRL-VERIFICATION-SCOPE-COVERAGE-CHECK	both	Pre-dispatch check that enumerates the Article 4(1) (Article 14(1) for crypto-asset transfers) data elements transmitted with the transfer, and, for a transfer of funds not made to or from a payment account, the Article 4(3) information. It asserts that each enumerated element is covered by a recorded verification event before the gate passes. Anchored in: EU 2023/1113 Article 4(4) — 'the information referred to in paragraph 1 and, where applicable, in paragraph 3'; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP
Verification source independence check CTRL-VERIFICATION-SOURCE-INDEPENDENCE-CHECK	both	Pre-verification check that asserts the source about to be used is not provided by, or under the control of, the originator. It rejects self-attestation, originator-supplied documents being verified against themselves, and originator-controlled registries, before the verification event is recorded as passing. Anchored in: EU 2023/1113 Article 4(4) — 'independent source'; EU 2023/1113 Article 14(6) — verification duty borne by the originator's CASP

End of extract. Which modes each control addresses, the executable form each control takes, the adjudication rationales and the calibration are engagement material.