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Investment Guardian

Pre-trade protection for CFDs, crypto & precious metals — built entirely on Revolut's own AI stack.

Yash Todkari

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The Gap Between Sherlock and the Trade

Revolut protects money leaving the app. Nothing yet protects the moment it's staked on a Revolut-native position.

30%

Cut in investment-scam card losses since Sherlock's 2024 AI feature

€11.5M

AGCM fine, Apr 2026 — incl. unclear pre-trade disclosure

2025–26

ECB flags product governance outpacing controls

Sherlock evaluates every card payment in under 50ms and already cuts investment-scam losses by 30%. But there is no equivalent layer for the moment a customer opens a first CFD, crypto, or precious-metals position — exactly where the AGCM and ECB are now finding disclosure and governance gaps.

Sources: Revolut, Feb 2024 · AGCM press release PS12974, 2 Apr 2026 · Financial Times, 10 Jun 2026

Investment Guardian: One Layer, Four Capabilities

Configured — not re-coded — per instrument, market, and risk policy. Plugs directly into rails Revolut already runs.



1 · Pre-Trade Risk & Understanding Score

Adaptive 3–5 question check on leverage & loss understanding, combined with behavioural signals into a Low / Medium / High score.



2 · Scam Archetype Classifier

Classifies likely patterns — fake broker, signal-group, romance-investment, high-yield crypto — using PRAGMA embeddings.



3 · Archetype-Tailored Intervention

Response scales with risk: concise disclosure, cooling-off, strong warning, or live fraud-specialist escalation.

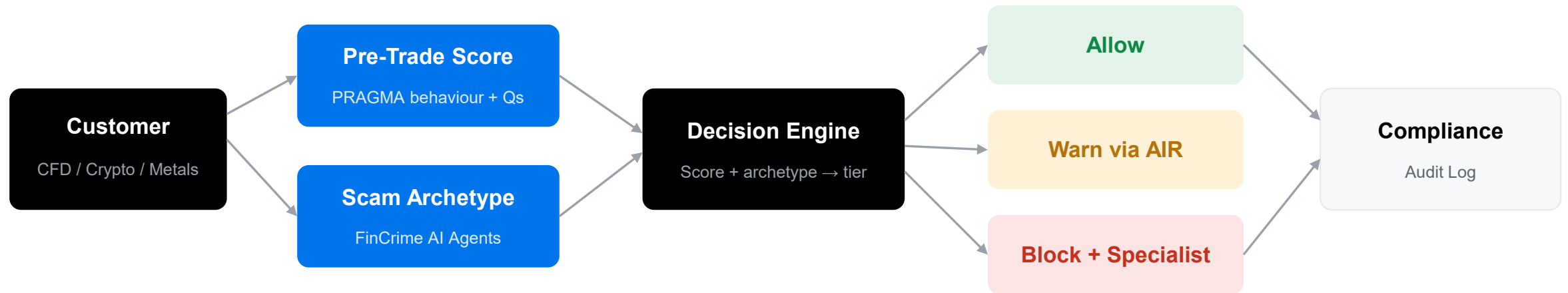


4 · Compliance-Ready Reporting

Structured logging extending existing FinCrime dashboards — audit-ready by default, no extra build.

How It Works

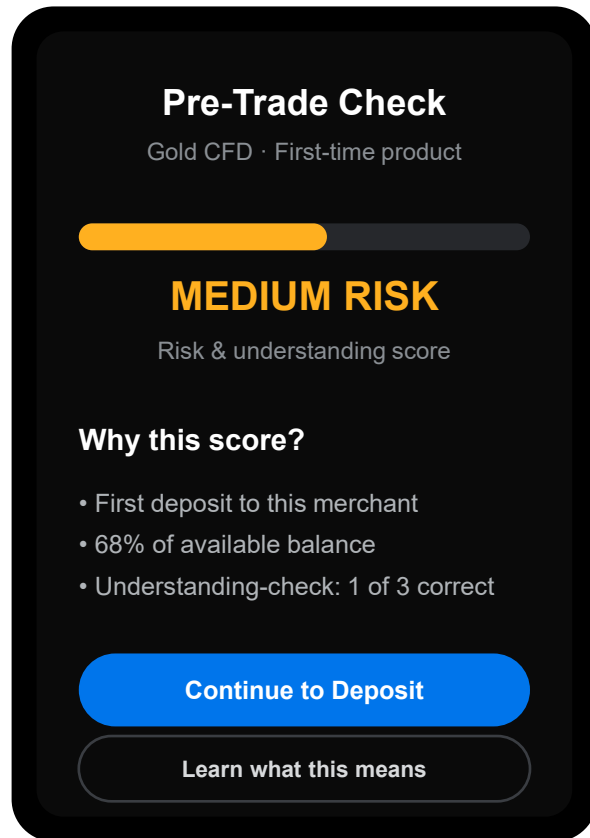
Every path — allow, warn, or block — terminates in the same immutable compliance log.



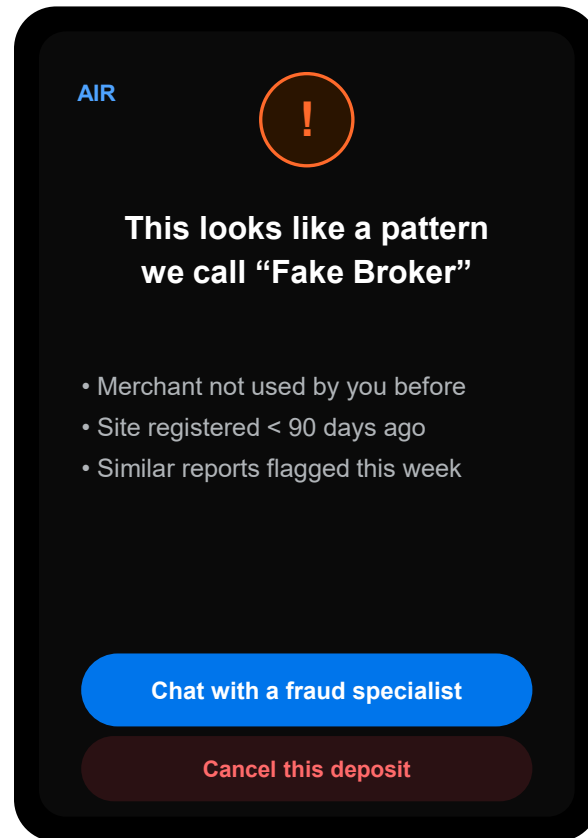
Platform, not patch — a configuration layer on PRAGMA, FinCrime AI Agents, and AIR. No new ML platform, no new case-management system.

How It Feels Inside the App

Marco funds a deposit to an unfamiliar Gold CFD broker. Guardian scores it Medium, flags “Fake Broker,” and AIR opens a specific conversation — not a generic disclaimer.



Screen 1 — Pre-Trade Risk Score



Screen 2 — AIR Intervention

Design principles

- Name the pattern, not just the risk
- Show the evidence behind the score
- Never fully block silently
- Respect the expert vs. novice split

Built on Revolut's Real Stack

Revolut invests in shared rails, not one-off systems. Guardian is specified against what these platforms do today.



PRAGMA

Revolut's transaction foundation model — transformer encoder, 10M–1B parameters, trained on 24–40bn+ events from 26M+ users, 111 countries.

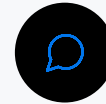
Guardian use: Behavioural half of the Risk Score.



FinCrime AI Agents

No-code platform to configure end-to-end AI agents with full observability. 9 agents already run AML/FinCrime decisions monthly.

Guardian use: Where the classifier is configured.



AIR

Revolut's in-app assistant, live to 13M UK customers since Apr 2026. Zero data retention; biometric-gated sensitive actions.

Guardian use: Delivers the Medium-tier warning.

Metrics Before Features

Every capability ties to an explicit KPI and hypothesis — the outcome-driven framing a “local CEO” needs to defend a roadmap call.

Investment Scam Loss Rate

% of losses attributable to scams within high-risk flows

Complaint & Ombudsman Rate

Escalations per 10,000 high-risk investment transactions

Consumer Trust Score

Segment NPS for users engaging with high-risk flows

Conversion & Revenue

First-time deposit conversion for legitimate users

Headline hypothesis

H1 — The pre-trade risk & understanding check reduces high-loss scam incidents on first-time CFD deposits by **≥20%**, with acceptable conversion impact capped at **3–5%**.

Operating From Day One

A concrete 90-day plan — discovery, scoped MVP, then algorithmisation — matching Revolut's own product-launch framework.

DAYS 1–30

Deep Discovery & Alignment

- Onboard into FinCrime AI Agents, PRAGMA, AIR
- Shadow fraud & investment teams
- Agree KPIs, hypotheses, cohorts

DAYS 31–60

MVP Build & Experiments

- Scoped MVP: 1–2 flows, one market
- Instrument dashboards, launch A/B
- Iterate on quiz & intervention UX

DAYS 61–90

Algorithmisation & Scaling

- Present results in product review
- Abstract into configurable modules
- Agree scaling roadmap & governance

Why This Reflects How I'd Operate

Mapped to Revolut's actual values — Never Settle, expressed through four principles.



Think Deeper

Traced the problem to three dated, sourced regulatory signals — not a hunch.



Get It Done

Scoped to ship on existing rails within one quarter, not a platform rebuild.



Dream Team

A clear pod structure across Eng, Design, Data, Legal, and FinCrime.



Deliver Wow

Conversational, AIR-native interventions — not a static disclaimer wall.

Yash Todkari — Double Master's in International Management & Business Innovation, hands-on GenAI-for-product-discovery research, and an active CFD/metals trader — this case study was built from both sides of the modal.

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Let's talk.

I'd welcome the chance to walk through the archetype taxonomy, the experiment design, or the PRAGMA / FinCrime integration in more depth.

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