



Jersey Financial
Services Commission

Trust company business sector

Money laundering and terrorist
financing risk data analysis

December 2024

www.jerseyfsc.org

Contents

3. Sector overview
4. Customer residency
5. Higher risk jurisdictions (money laundering)
6. Higher risk jurisdictions (terrorist financing)
7. Politically exposed persons
8. Politically exposed persons (jurisdictions)
9. Customer risk
10. Sound business practice policy
11. High net worth customers and use of tax disclosure facilities
12. TCB services provided
13. TCB sector employees
14. Reliance on obliged persons and MLO exemptions
15. Key risk indicators
17. Appendix 1 - references
18. Appendix 2 - glossary

This report forms part of a series which is being published to improve the understanding of money laundering across different sectors and activities. Key risk indicators are included for each sector to provide useful benchmarking for supervised persons looking to assess their own money laundering and terrorist financing risks.

These reports are not risk assessments. Each report contains some explanation to support the aggregated data which is presented through a combination of graphs and tables. Whilst some data quality and integrity checks are performed on receipt of the data, we rely on the accuracy and completeness of data provided by industry.

Sector overview

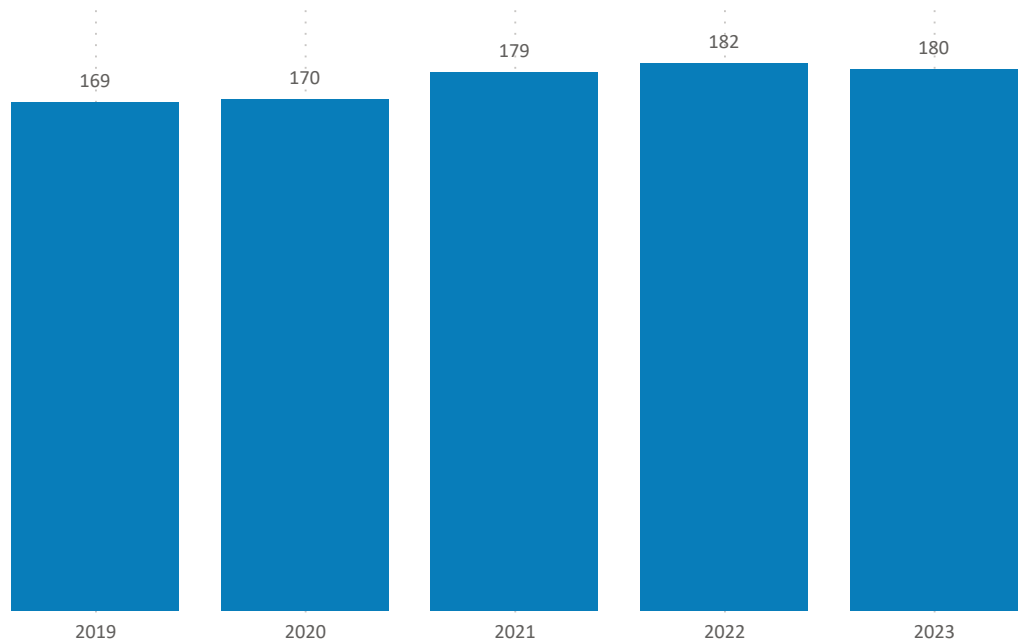
66K
 Customer Relationships

£1.4T
 Assets Under Management

4,863
 Employees

171
 Customer Jurisdictions

Number of reporting entities



Jersey has a large and significant TCB sector directly employing nearly 5,000 individuals and with a geographical reach that is second only to the banking sector in Jersey (TCB: 171 jurisdictions, Banking: 206). As at October 2024, the JFSC website listed 774 persons registered to carry on Trust Company Business (“TCB”) activity, including natural persons and participating members.

Data analysed in this report is based on annual supervisory risk data submissions from Affiliation Leaders and standalone TCBs for the period 2019 to 2023. Participating member data is provided as part of their affiliation leader’s submission. Whilst some data quality and integrity checks are performed on receipt of the data, the JFSC is reliant on the TCB sector for accuracy and completeness of data provided.

The data collected includes a range of factors which inform our view of risk at a national, sectoral and entity level. This includes the residence of TCB customers, exposure to higher risk customers and politically exposed persons (PEPs), and the services provided by TCBs to their customers.

In aggregated form the reference to customers must be understood as customer relationships, the data does not identify the number of unique customers that utilise the services of the TCB sector. Whilst the risk of double counting customers is less than in other sectors it is still a possibility if a person is a customer of more than one TCB.

Calculating the value of assets under management for the sector is not straightforward. A huge variety of assets are managed by the TCB sector with the regulatory framework silent on the methodology to be used to “value” assets. Consequently, the £1.4 trillion reported by the sector for 2023 should be considered as an indicative value.



Customer residency

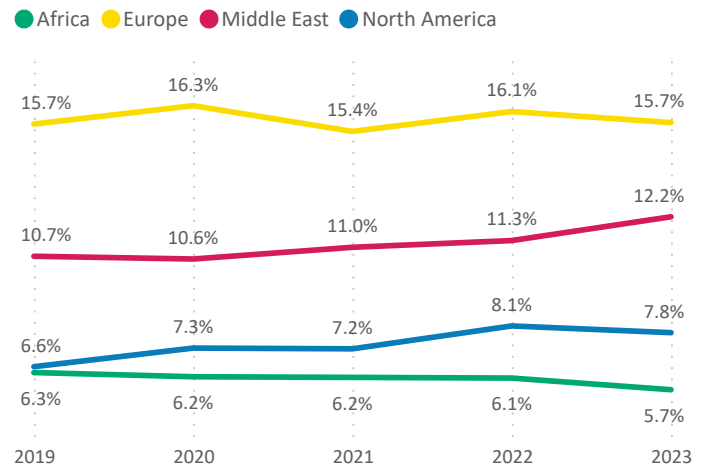
4.1. Top 10 jurisdictions - residence of non-Jersey customers or beneficial owners (2023)

Jurisdiction	Total Customers or Beneficial Owners	% of Total
United Kingdom	20,587	45.3%
United States of America	3,118	6.9%
South Africa	1,540	3.4%
United Arab Emirates	1,386	3.0%
Saudi Arabia	1,369	3.0%
Switzerland	1,251	2.8%
Hong Kong	1,051	2.3%
Kuwait	1,019	2.2%
Ireland	800	1.8%
Singapore	623	1.4%

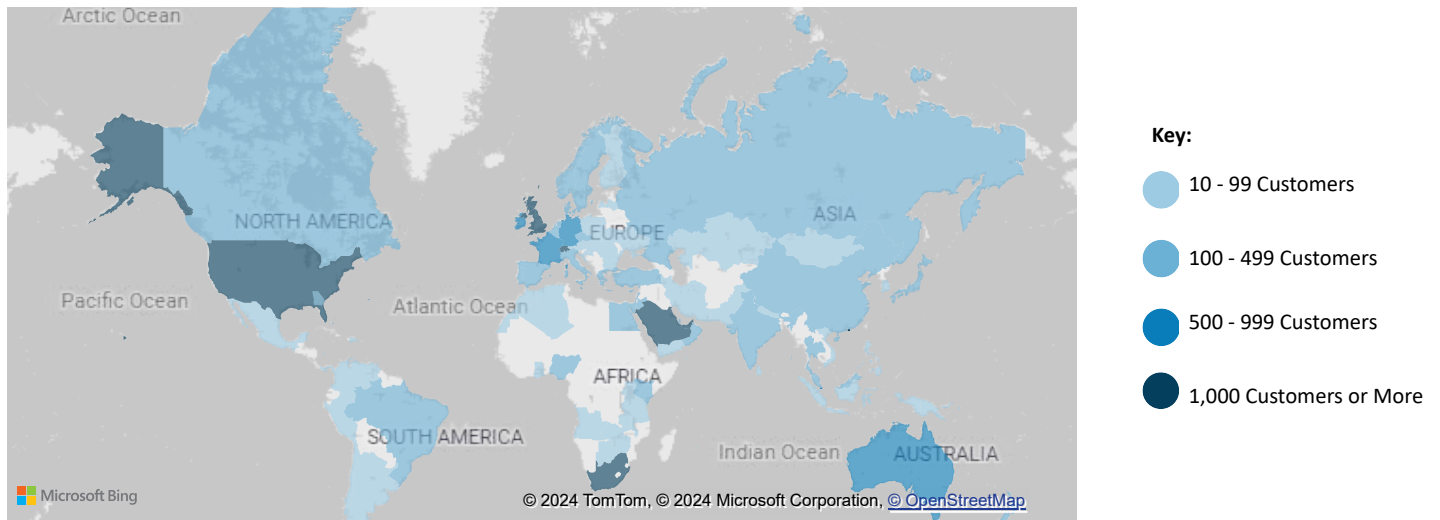
Key: Jurisdictions Listed in Appendix D2

Other Jurisdictions

4.2. Regional trends - percentage of all non-Jersey customers or beneficial owners



4.3. Residence of non-Jersey customers or beneficial owners (2023)



Jurisdictional data is collected in respect of the residency of TCB customers and the beneficial owners of customers which are not an individual. The TCB data demonstrates the international nature of the financial services sector in Jersey with customers reported from 171 different jurisdictions and the majority of customers reported as being resident outside Jersey.

Considering the reported geographical spread of customers and beneficial owners, excluding Jersey highlights that the top 10 reported customer jurisdictions are consistent with Jersey Finance’s target jurisdictions and global international finance centres. These 10 jurisdictions account for 72.1% of the customer relationships with the sector’s strong connection to the UK evidenced by 45.3% of the customers reported as resident there. Other jurisdictions of note are: USA (6.9%), South Africa (3.4%), the UAE (3.0%), and Saudi Arabia (3.0%). Regional trends demonstrate that over the reporting period, there has been growth in the proportion of customer relationships with residents of the Middle East (2019: 10.7% of non-Jersey customers, 2023: 12.2%) and North America (2019: 6.6%, 2023: 7.8%).



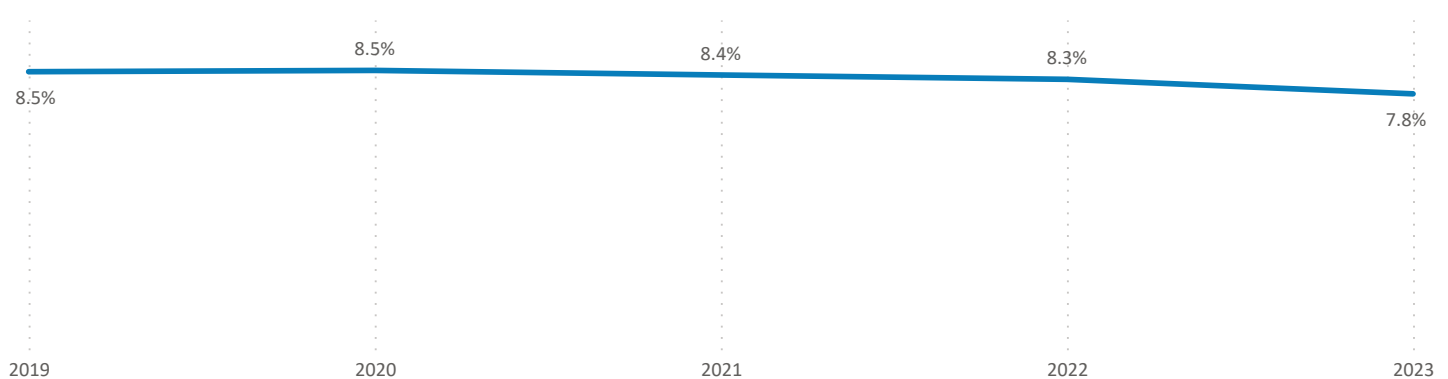
Higher risk jurisdictions

Jurisdictions on the FATF black/grey list or 3 or more sources in appendix D2

5.1. Individual customers or beneficial owners who are resident in higher risk jurisdictions

Year Jurisdiction	2019		2020		2021		2022		2023	
	Customers	% of Total	Customers	% of Total	Customers	% of Total	Customers	% of Total	Customers	% of Total
South Africa	1,708	3.7%	1,620	3.6%	1,593	3.2%	1,525	3.2%	1,540	3.4%
Kenya	534	1.2%	510	1.1%	709	1.4%	659	1.4%	434	1.0%
Monaco	410	0.9%	407	0.9%	446	0.9%	417	0.9%	418	0.9%
Lebanon	251	0.5%	325	0.7%	410	0.8%	441	0.9%	396	0.9%
Russian Federation	302	0.7%	246	0.5%	271	0.5%	153	0.3%	136	0.3%

5.2 Percentage of all individual customers or beneficial owners resident in higher risk jurisdictions



[Appendix D2 – Countries and territories identified as presenting higher risks – Jersey Financial Services Commission \(jerseyfsc.org\). \(Live Link\)](#)

Appendix D2 of the AML/CFT/CPF Handbook provides details of countries, territories and areas that have been identified by reliable and independent sources as presenting a higher risk of money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction. The analysis above is based on the jurisdictions listed in Appendix D2 at July 2024 - trended data displayed demonstrates changes in the number of customer relationships from these jurisdictions rather than changes made to Appendix D2 over the period.

For the purpose of this analysis, higher risk jurisdictions have been defined as those listed on the FATF black or grey list (Source 1 and Source 2 of Appendix D2) or Jurisdictions listed in 3 or more of the remaining Appendix D2 sources. Of the 70 jurisdictions which meet this criteria, there were no customer connections to residents of 23 jurisdictions and minimal connections (less than 0.05% of the sector total) to another 38 jurisdictions.

In 2023, 7.8% of reported non-Jersey customer relationships are from higher risk jurisdictions with just under half of these from South Africa (3.4%). Other prominent higher risk jurisdictions include Kenya (1.0%), Monaco (0.9%), Lebanon (0.9%), and Russia (0.3%). The proportion of customers from higher risk jurisdictions has decreased steadily year on year driven by reductions in customers from South Africa and Russia.

It is important to note that Monaco and South Africa are included in the higher risk jurisdiction list solely as they currently appear on the Financial Action Task Force (FATF) list of jurisdictions under increased monitoring ("Grey List"). South Africa was added February 2023 and Monaco June 2024.

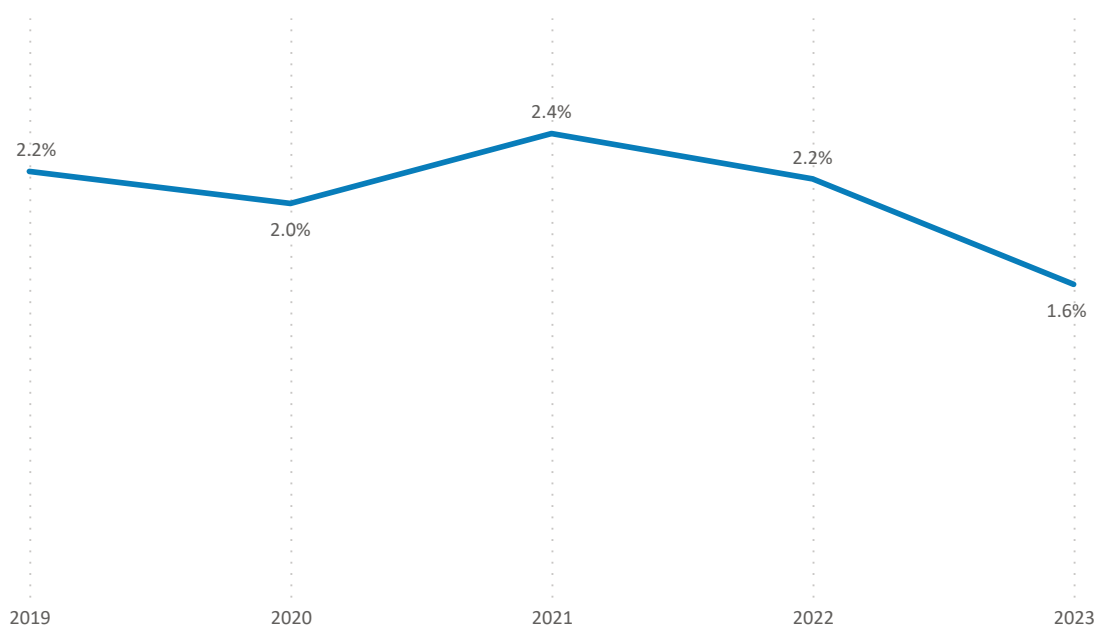


Higher risk jurisdictions

Jurisdictions that may present a higher risk of facilitating terrorist financing (Government of Jersey list)

6.1. Individual customers or beneficial owners who are resident in higher risk jurisdictions

Year	Customers	% of Total
2019	1,017	2.2%
2020	931	2.0%
2021	1,196	2.4%
2022	1,045	2.2%
2023	738	1.6%



[Guidance on countries with higher risk of facilitating terrorist financing \(gov.je\)](#) (live link)

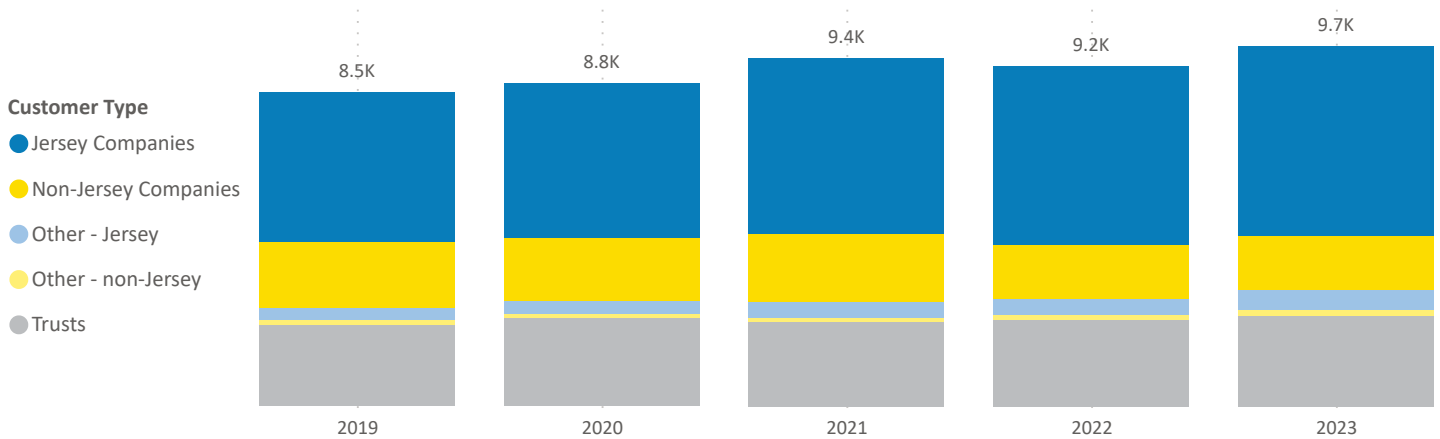
As part of the Government of Jersey's programme of combatting financial crime, guidance has been produced on specific countries that may present a higher risk of facilitating terrorist financing (TF).

The analysis above is based on the jurisdictions listed as at July 2024 and highlights that 1.6% of TCB reported customer relationships are from these jurisdictions. Of these customers, the vast majority are from either Kenya, Nigeria or Russia. The proportion of customers from higher risk jurisdictions has decreased from 2.4% in 2021 due primarily to a reduction in Russian customers.

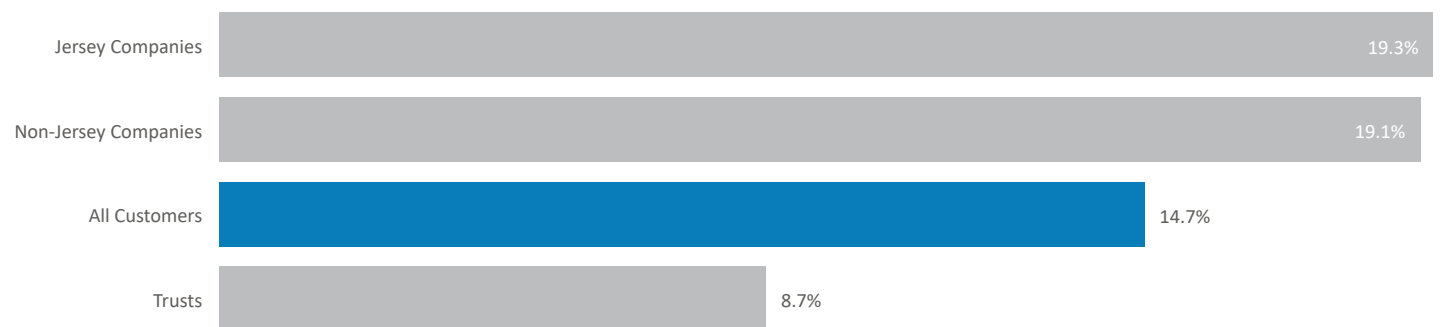


Politically exposed persons

7.1 PEP connections by customer type



7.2 Percentage of customers who are, or are connected to, a PEP (2023)



The PEP data in this report is based on a combination of responses from the footprint data collection (section I) and the TCB sector data (section II). The number of PEP connections provided in section I represents the unique number of PEPs who are, or are connected to, one or more customer split by country. The data collected in section II provides the number of customers who are, or are connected to, one or more PEPs. Whilst these values may differ, both data points are significant for assessing the level of PEP connections across the sector and the risks associated with these relationships.

The total number of customer relationships reported where the customer is, or is connected to, a PEP has increased from 8.5k in 2019 to 9.7k in 2023. Based on 2023 data, the TCB sector has the highest level of PEPs when considered against the total number of reported customer relationships (14.7%) with this ratio being highest for Jersey Companies (19.3%) and Non-Jersey Companies (19.1%). The data collected also demonstrates that of all the PEP connections in the TCB sector, more than half (56%) involved business relationships or one off transactions where property of the PEP was handled.

In September 2023, the Money Laundering (Jersey) Order 2008 (MLO) was updated to allow for the declassification of PEPs but prior to this any customer which had been classified as a PEP would always remain a PEP. As such, it is likely that the total reported PEP connections could over-estimate the current exposure to PEPs within the sector. Given the complexities involved in de-classifying a PEP it is likely to take some time before this has a material impact on the reported data. In 2023, 28 of the 180 reporting TCBs had declassified one or more PEPs.



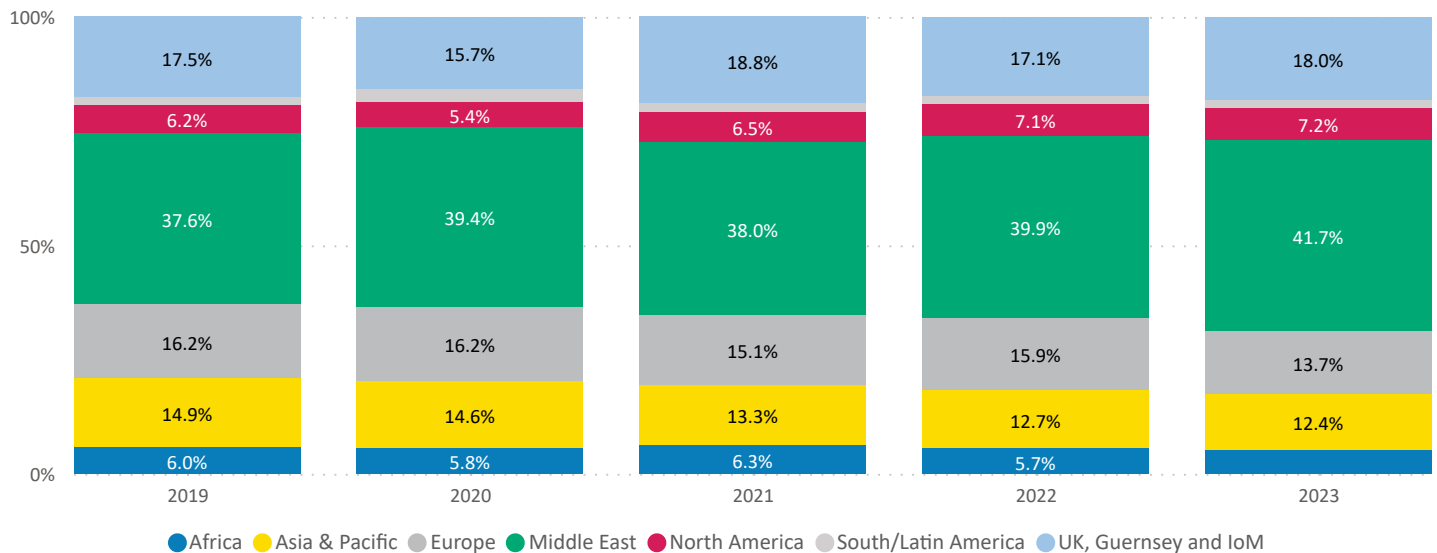
Politically exposed persons (jurisdictions)

8.1 Non-Jersey PEP connections, by region

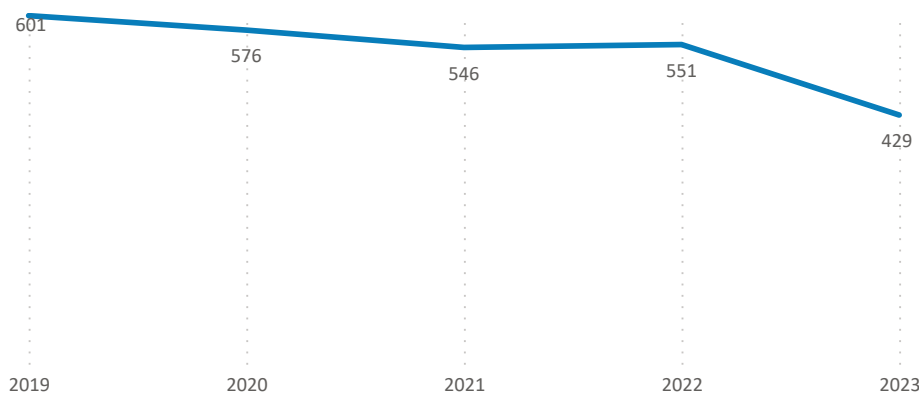
Region	2019	2020	2021	2022	2023
Middle East	37.6%	39.4%	38.0%	39.9%	41.7%
UK, Guernsey and IoM	17.5%	15.7%	18.8%	17.1%	18.0%
Europe	16.2%	16.2%	15.1%	15.9%	13.7%
Asia & Pacific	14.9%	14.6%	13.3%	12.7%	12.4%
North America	6.2%	5.4%	6.5%	7.1%	7.2%
Africa	6.0%	5.8%	6.3%	5.7%	5.2%
South/Latin America	1.6%	2.9%	2.0%	1.8%	1.8%

Section I data highlights that the Middle East is the region which consistently gives rise to the largest proportion of the reported non-Jersey PEP relationships (2019: 37.6%, 2023: 41.7%) which is consistent with it being a target jurisdiction of Jersey Finance who have an office in Dubai. Over the period analysed, the number connections to PEPs from the Middle East, United Kingdom and North America have increased while the connections to PEPs from Europe and Asia have decreased slightly.

8.2 Non-Jersey PEP connections, by region



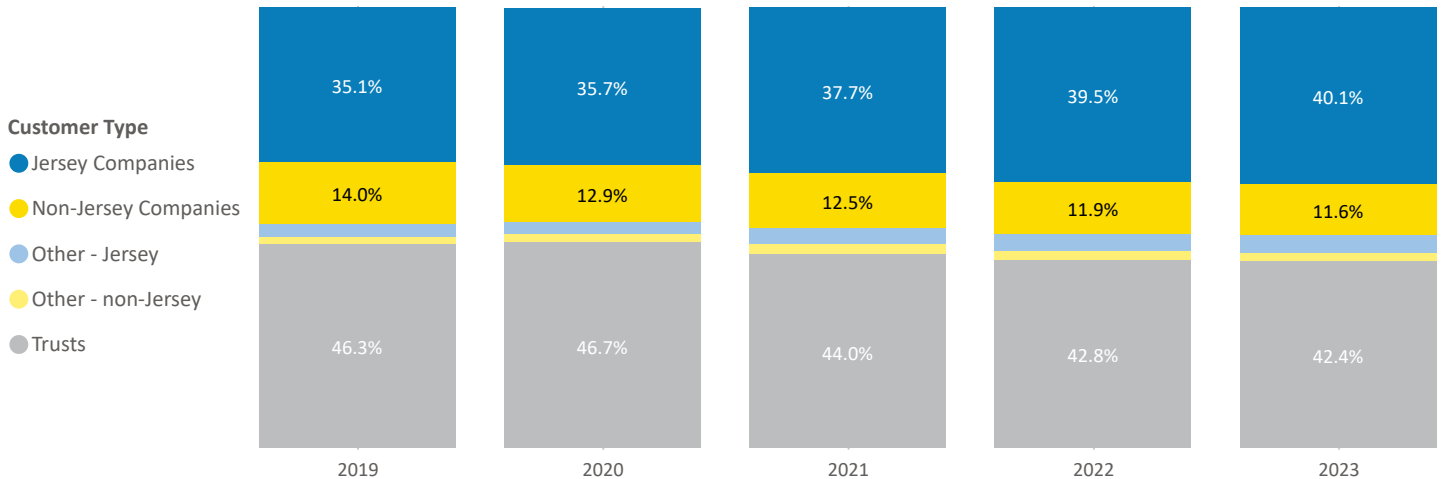
8.3 PEP Connections - jurisdictions listed on appendix D2 source 7



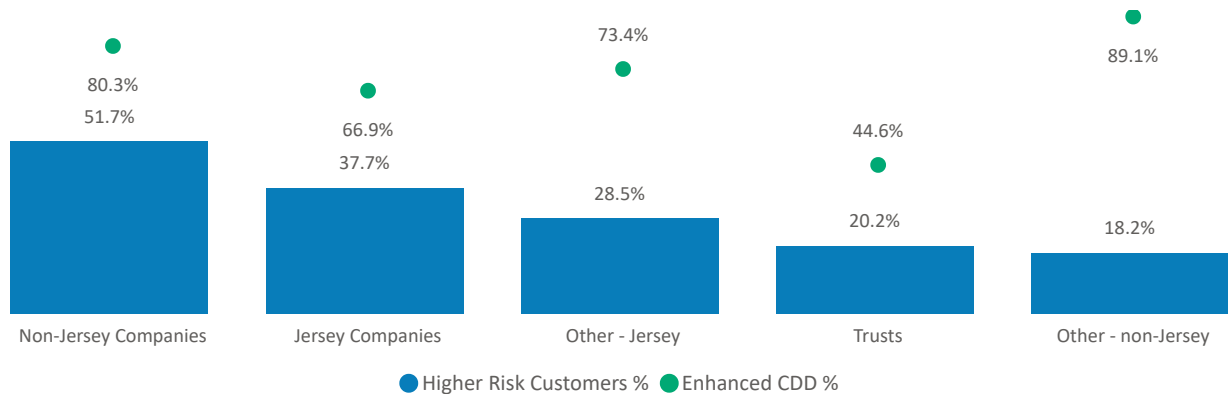
Source 7 of Appendix D2 utilises the Transparency International Corruption Perception Index and provides a list of jurisdictions which may present a higher risk of corruption. The number of connections to PEPs from these jurisdictions has decreased steadily since 2019 (2019: 601, 2023: 429).

Customer Risk

9.1 TCB customer types



9.2 Percentage of customers rated as higher risk and percentage of customers to which enhanced CDD was applied (2023)



Data collected from TCBs includes the risk ratings they applied to each customer and the number of customers for which enhanced CDD was applied. Internationally the provision of TCB services is recognised as being an activity susceptible to money laundering. This is reflected in Jersey's national risk assessments which rates the threat of money laundering as high in both the 2020 risk assessment and the 2023 refresh. This is generally recognised by TCBs in their customer risk assessments and is reflected in the data. The proportion of customers rated as higher risk by the TCBs remains stable, with 31% of customers rated as higher risk in 2023.

On considering which type of customer is given the highest risk rating non-Jersey and Jersey companies score highest with 51.7% and 37.7% of these reported as higher risk. This position is aligned with the PEP data on page 6.

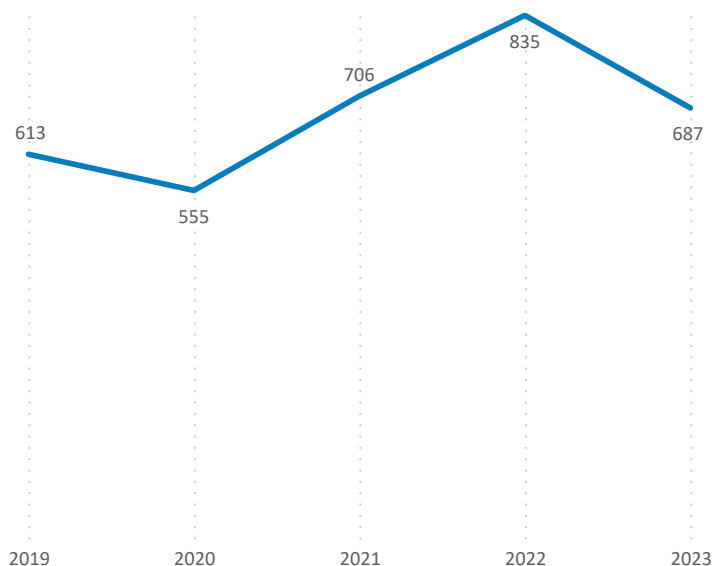
Enhanced customer due diligence (CDD) measures are applied (in line with the requirements of the Money Laundering (Jersey) Order 2008 (Money Laundering Order)), reporting highlights that Enhanced CDD measures are not only applied where a relationship is considered higher risk (89.1% of other – non Jersey” customers are subject to enhanced CDD whilst 18.2% are reported as higher risk). Overall, the data demonstrates that enhanced CDD has been applied for 60% of customer relationships reflecting the conservative approach to onboarding new customers across the sector as a whole.

Sound business practice policy

10.1 Customers undertaking activities listed in the sound business practice policy, table 2

	2019	2020	2021	2022	2023
SBPP Table 2 - Activity 7	492	421	516	519	446
SBPP Table 2 - Activity 1	65	73	89	146	91
SBPP Table 2 - Activity 2	24	32	43	30	38
SBPP Table 2 - Activity 4	13	13	30	30	32
SBPP Table 2 - Activity 3	14	15	15	20	18
SBPP Table 2 - Activity 8				42	33
SBPP Table 2 - Activity 6	2	1	5	17	9
SBPP Table 2 - Activity 5	3	0	8	13	6
SBPP Table 2 - Activity 11				13	8
Total	613	555	706	830	681

Sound business practice policy, table 2



Activity 1 - Trading activities which include the provision of goods or services that require payment in advance, where such goods or services are not subject to consumer protection or pose a risk of fraud.

Activity 2 - Arms, weapons, ammunitions, countermeasures or other military or defence equipment, goods, technology, and personnel (as applicable).

Activity 3 - Manufacture, marketing or sale of pharmaceutical goods or devices which are not licensed or have not received marketing authorisation in the jurisdiction where they are manufactured, marketed, sold or supplied.

Activity 4 - Conduct of scientific research.

Activity 5 - Involvement, directly or indirectly, in the exportation or importation of goods or technology, which would require an authorisation or licence under Jersey 'dual-use' legislation.

Activity 6 - Investment in or purchase of 'qualifying debt' as defined in the Debt Relief (Developing Countries) (Jersey) Law 2013.

Activity 7 - Involvement, directly or indirectly, in mining, drilling or quarrying for natural resources.

Activity 8 - Involvement, directly or indirectly, in initial coin offerings or providing other services relating to virtual assets.

Activity 9 - The sale or facilitation of sale of citizenship/ citizenship by investment (which includes the administration associated with citizenship and/ or arranging for citizenship).

Activity 10 - activity is regulated in Jersey and not in the 'target market', the JFSC has the right to decline the incorporation/establishment.

Activity 11 - The cultivation, production, supply, use, export or import of cannabis or any of its derivatives.

Table 2 of the sound business practice policy (**SBPP**) sets out 11 activities that are not regulated by the JFSC but are considered to likely pose a potential reputational risk to Jersey. Noting that we are dependent on the quality of data provided, Table 8.1 shows the number of TCB customers that are carrying out any activity listed in Table 2 of the SBPP.

The most prominent higher risk activities remain Activity 7 (Involvement, directly or indirectly, in mining, drilling or quarrying for natural resources) and Activity 1 (Trading activities which include the provision of goods or services that require payment in advance, where such goods or services are not subject to consumer protection or pose a risk of fraud). In 2023, the number of customers carrying out such activities represents 1% of the total reported TCB customer relationships.

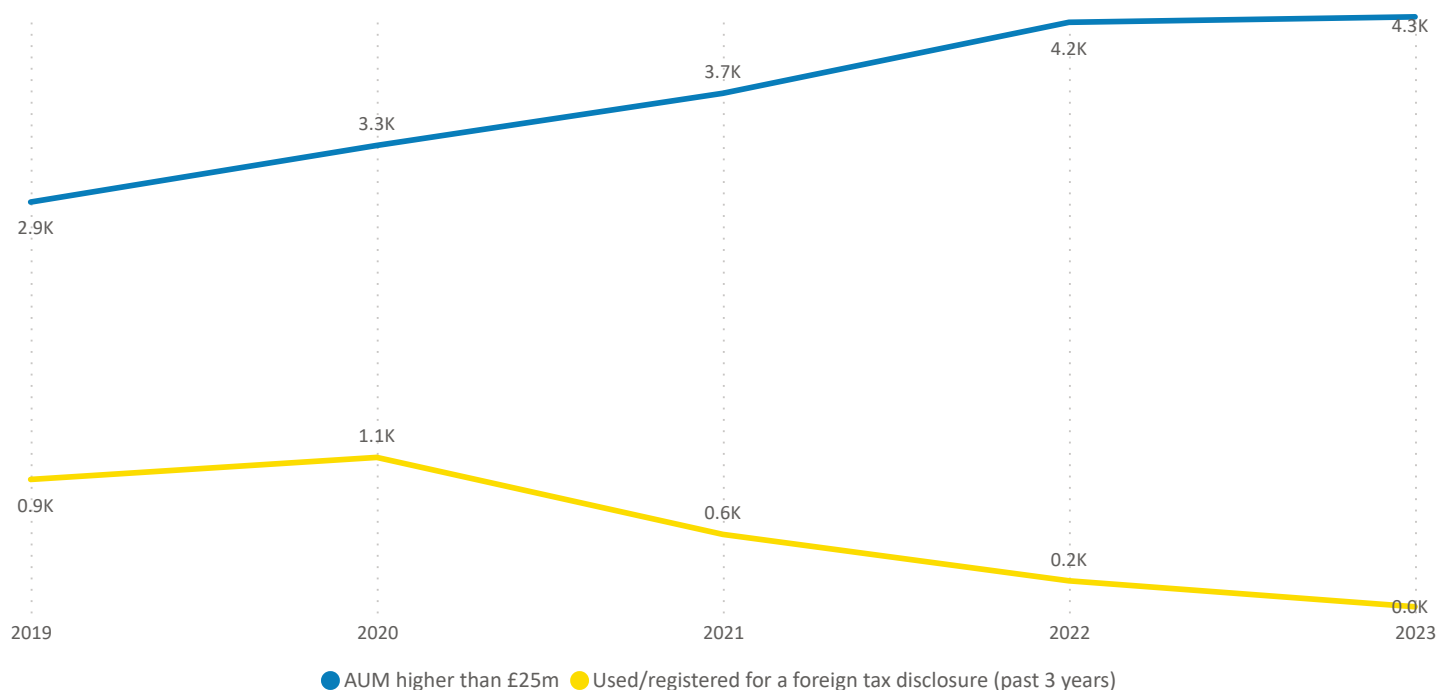
High net worth customers and use of tax disclosure facilities

11.1 Customers registered for a foreign tax disclosure facility

	2019	2020	2021	2022	2023
Used/registered for a foreign tax disclosure (past 3 years)	947	1,105	553	220	34

11.2 High net worth customers (AUM £25m or more)

	2019	2020	2021	2022	2023
AUM higher than £25m	2,936	3,342	3,716	4,225	4,264



As part of the supervisory risk data collection the JFSC collects data relating to the number of TCB customers that have used or registered for a foreign tax disclosure facility in the past 3 years. This is intended to capture cases where a customer has: (i) reported under a tax amnesty; or (ii) disclosed to a revenue authority because it offers tax benefits. Over the last three years, the data demonstrates a significant decrease in customers that have used/registered for a foreign tax disclosure facility - in 2020 this totalled 1,105 customers across the whole sector (1.7% of all customers) but in 2023 this had decreased to 34 customers (less than 0.1% of all customers). During this period the common reporting standards have been introduced and many tax amnesty schemes have been closed which will have contributed to the reduction in tax disclosures.

Jersey is known as an international finance centre with a particular expertise in wealth management, this is reflected in table 11.2. The guidance to the supervisory risk data sets £25million as a reporting threshold for high-net-worth customers. Over the reporting period the number of high-net-worth customers has increased from 2,936 in 2019 to 4,264 in 2023, accounting for more than 6% of the total 2023 reported customer relationships.

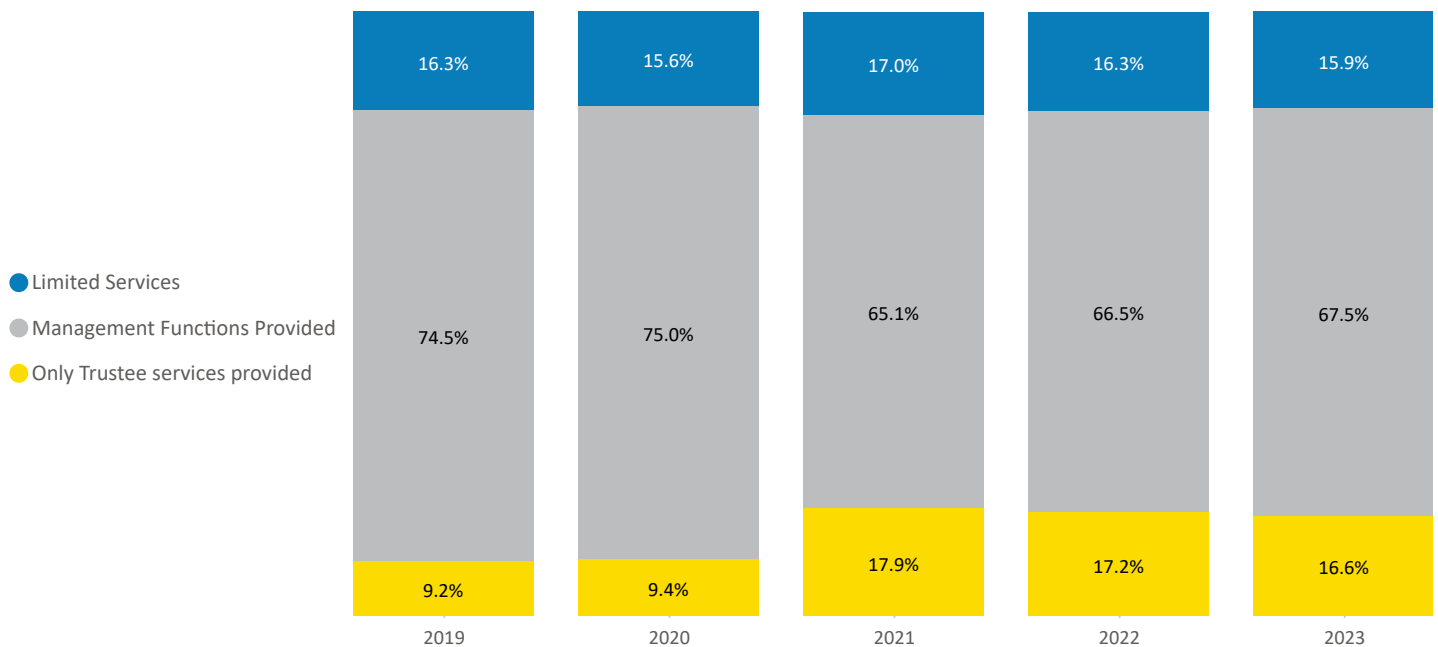


Services provided

12.1 Services provided by customer type (2023)

TCB Service	Jersey Companies	Non-Jersey Companies	Other - Jersey	Other - non-Jersey	Trusts	Total
Management Functions Provided	16,782	6,392	1,223	269	20,754	45,420
Only Trustee services provided					11,141	11,141
Limited Services	8,906	950	591	145	131	10,723

12.2 Services provided by year



The sector offers a full range of trust and company activities with management services being the activity reported as most often provided to customers. Whilst management services activity represents 67.5% of the reported activity in 2023 this is a decrease from the high in 2020 (75%). Over the same period there has been a rise in the provision of trustee-only services. 'Limited services' - which refers to the situation where a reporting entity provides only a registered office, secretary, or both to its customer - were provided to 15.9% of TCB customers in 2023.

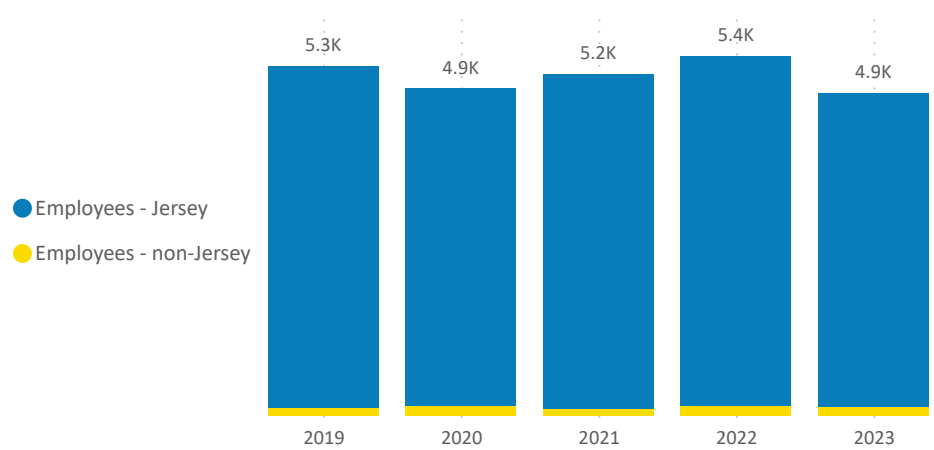


TCB sector employees

13.1. Employee trend

Year	Employees - Jersey	Employees - non-Jersey
2019	5,146	120
2020	4,780	148
2021	5,042	110
2022	5,262	151
2023	4,715	148

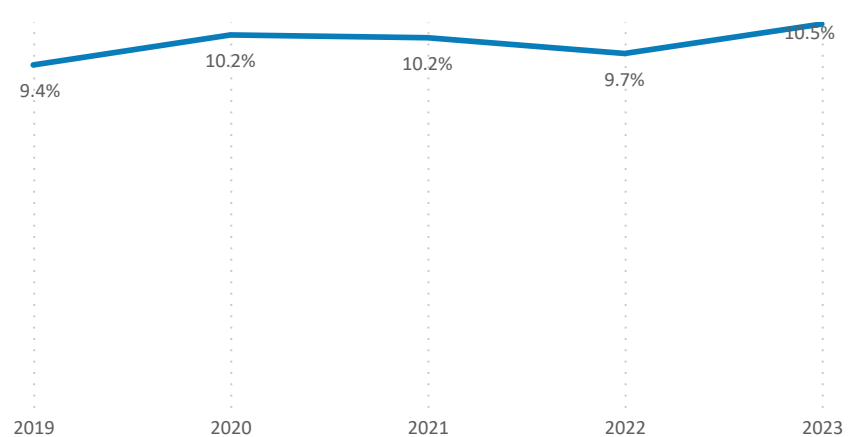
13.2. Jersey and non-Jersey employees



13.3. Compliance and risk employee trends

Year	Compliance and Risk Employees, Jersey	Compliance and Risk Employees, Non-Jersey	Compliance and Risk Vacancies
2019	489	7	39
2020	488	17	29
2021	502	22	47
2022	485	42	48
2023	474	39	28

13.4. Compliance and risk employees as a % of all employees



Data collected from TCBs demonstrates that during the period 2019 - 2023 there were an average of 5,000 employees working in the sector. The proportion of TCB employees working predominately outside of Jersey remains very low throughout the period analysed with 3% of employees based outside of Jersey in 2023.

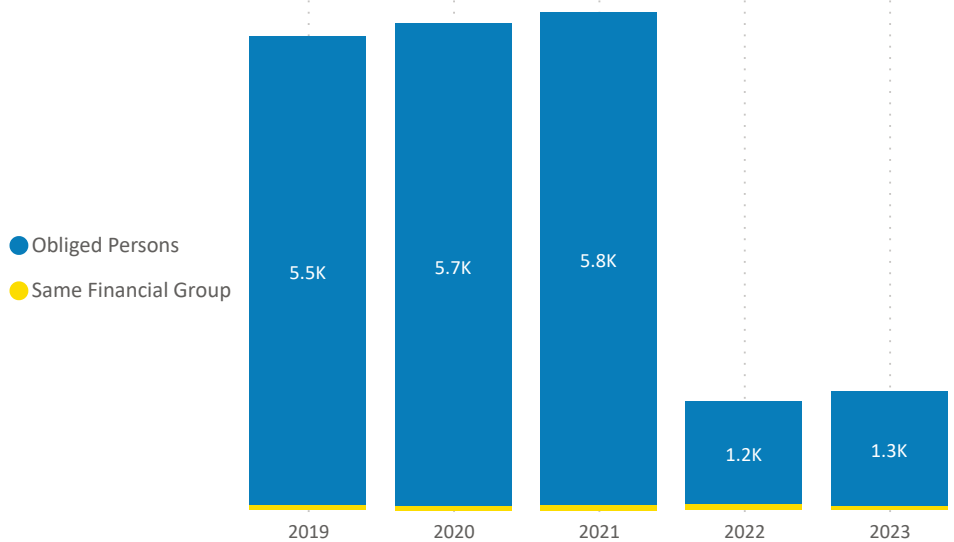
On average, over the period between 2019 and 2023, 10% of TCB employees work in a compliance or risk role (high of 10.5% in 2023 and a low of 9.4% in 2019). In the same period there is a reported increase in the number of TCB compliance/risk employees based outside of Jersey (2019: 1.4%, 2023 7.6%). Compliance and risk vacancies increased steadily between 2020 and 2022 (2020: 29 vacancies, 2022: 48) but fell in 2023 (28 vacancies).



Reliance on obliged persons (article 16 of the MLO) and MLO exemptions (article 17 and article 18)

14.1 Number of customers where reliance has been placed on obliged persons or persons in the same financial group

Year	Customers where Reliance has been placed on Obligated Persons	Customers where Reliance has been placed on Persons in same FG
2019	5,498	69
2020	5,661	49
2021	5,788	59
2022	1,201	76
2023	1,341	54



14.2 Number of customers where article 17 or article 18 has been applied

	2019	2020	2021	2022	2023
Article 17	272	348	663	304	315
Article 18	2,062	2,029	2,051	3,656	3,724

Reliance (Article 16 of the MLO): Use of reliance by the TCB sector is not widespread and decreased significantly across the period 2019 – 2023, particularly between 2021 and 2022. This position is not expected to reverse, despite the very small increase 2022 – 2023, and applies to both obliged persons and persons in the same financial group.

Exemption from applying 3rd party identification requirements (Article 17B-D of the MLO): Use of the exemption remains rare. The number of customer relationships where the exemption has been used has been remained low across the period 2020 to 2023 and is reported as being used in respect of just 0.5% of the total reported customer relationships.

Specific CDD exemptions regarding identification measures (Article 18 of the MLO): there are five specific circumstances where the exemption can be utilised, of which the most widely used are where the relationship is with a:

- public authority or the company is listed on an IOSCO-compliant market or regulated market and
- pension, superannuation, employee benefit, share option or similar scheme

Key risk indicators

The data summarised demonstrates some key risk indicators which can inform our view of risk across the TCB sector. This includes inherent risk factors such as customers from higher risk jurisdictions and PEP connections as well as the application of enhanced due diligence, and reliance on obliged persons. For the TCB sector, this analysis has been split between larger TCBs with 50 or more employees and smaller TCBs with fewer than 50 employees. Details of how these key risk indicators have been calculated are included in the glossary section to allow entities to benchmark their own data against sector averages.

Number of entities

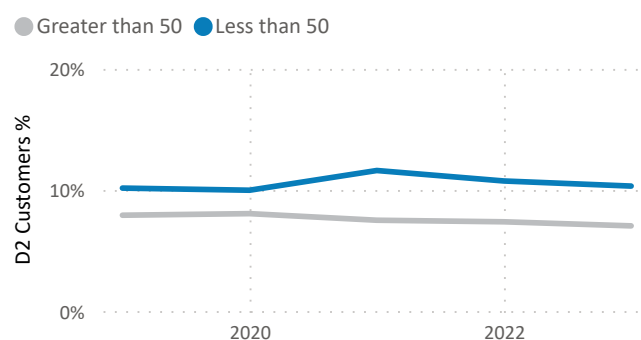
	2019	2020	2021	2022	2023
1. Sole Trader	58	62	69	70	71
2. Fewer than 50 Employees	70	68	70	74	70
3. Greater than 50 Employees	41	40	40	38	39

Share of total customers

	2019	2020	2021	2022	2023
1. Sole Trader	2%	3%	3%	2%	2%
2. Fewer than 50 Employees	26%	26%	26%	28%	27%
3. Greater than 50 Employees	72%	71%	71%	70%	71%

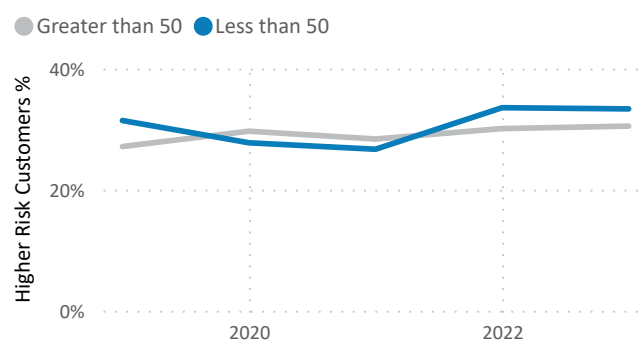
15.1 Key risk indicators - all TCBs

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2019	8.5%	2.2%	27.7%
2020	8.5%	2.0%	28.4%
2021	8.4%	2.4%	27.3%
2022	8.3%	2.2%	30.9%
2023	7.8%	1.6%	31.2%



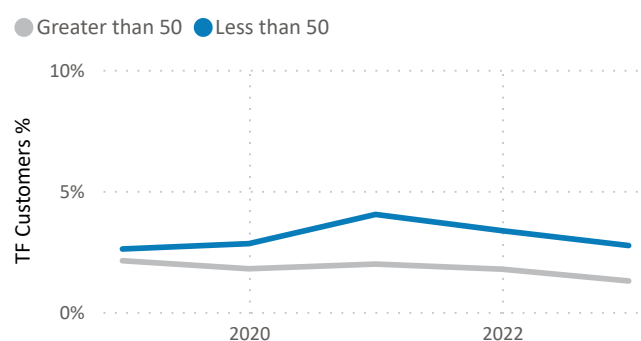
15.2 Key risk indicators - TCBs with greater than 50 employees

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2019	7.9%	2.1%	27.1%
2020	8.0%	1.8%	29.7%
2021	7.5%	2.0%	28.4%
2022	7.4%	1.8%	30.1%
2023	7.0%	1.3%	30.5%



15.3 Key risk indicators - TCBs with fewer than 50 employees

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2019	10.2%	2.6%	31.4%
2020	10.0%	2.8%	27.7%
2021	11.6%	4.0%	26.7%
2022	10.7%	3.4%	33.5%
2023	10.3%	2.7%	33.3%

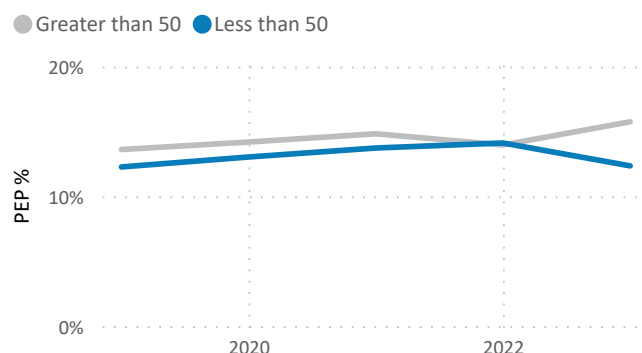




Key risk indicators

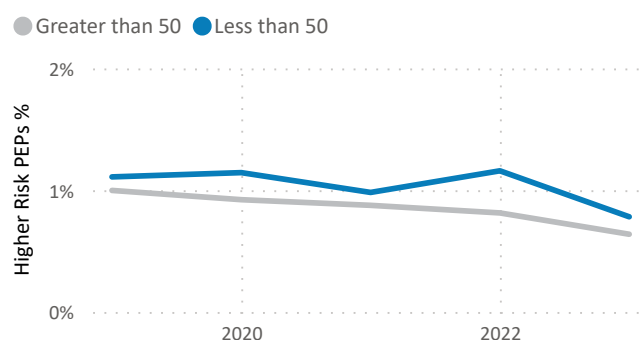
16.1 Key risk indicators - all TCBs

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2019	13.0%	1.0%	53%	8.4%
2020	13.6%	1.0%	53%	8.8%
2021	14.2%	0.9%	54%	8.7%
2022	13.9%	0.9%	58%	1.8%
2023	14.7%	0.7%	60%	2.0%



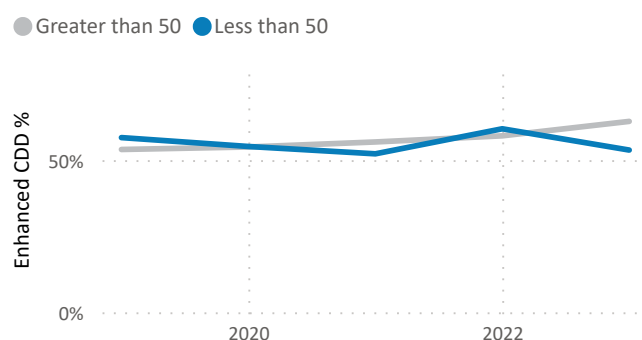
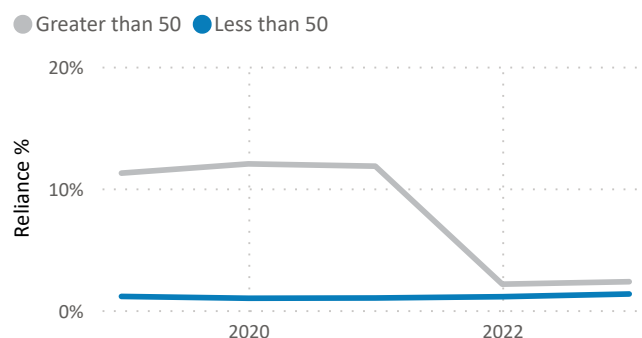
16.2 Key risk indicators - TCBs with greater than 50 employees

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2019	13.6%	1.0%	53%	11.3%
2020	14.2%	0.9%	54%	12.0%
2021	14.8%	0.9%	56%	11.8%
2022	14.0%	0.8%	58%	2.1%
2023	15.7%	0.6%	63%	2.3%



16.3 Key risk indicators - TCBs with fewer than 50 employees

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2019	12.3%	1.1%	57%	1.1%
2020	13.0%	1.1%	54%	1.0%
2021	13.7%	1.0%	52%	1.0%
2022	14.1%	1.2%	60%	1.1%
2023	12.3%	0.8%	53%	1.3%





References

Supervisory risk data guidance

Section I (Footprint) Data

[Guidance to Section I of risk based supervision data 2023 — Jersey Financial Services Commission \(jerseyfsc.org\)](#)

Section II (TCB) Data

[Guide to Section II of risk based supervision data: Trust Company Business 2023 — Jersey Financial Services Commission \(jerseyfsc.org\)](#)

Appendix D2

[Appendix D2 – Countries and territories identified as presenting higher risks — Jersey Financial Services Commission \(jerseyfsc.org\)](#)

Government of Jersey higher risk jurisdictions for terrorist financing

[Guidance on countries with higher risk of facilitating terrorist financing \(gov.je\)](#)



Glossary

Page 4 - 9

Reference	Source	Calculation
4.1	TCB data	Sum of question UA1, by jurisdiction. Top 10 jurisdictions by total volume.
4.2	TCB data	Sum of question UA1, by Region (Africa, Europe, Middle East & North America)
4.3	TCB data	Sum of question UA1, by jurisdiction. Jurisdictions with 10 or more customers or beneficial owners.
5.1, 5.2	TCB data	Sum of question UA1, for jurisdictions listed on the FATF grey-list or on three or more sources in Appendix D2. Values are displayed as a % of the total across all jurisdictions.
6.1	TCB data	Sum of question UA1, for jurisdictions listed in GoJ list. Values are displayed as a % of the total across all jurisdictions.
7.1	TCB data	Sum of questions TA15(i) - TA15(v)
8.1, 8.2	Section I (Footprint) Data	Sum of questions A23(a) and A23(b), jurisdictions grouped by region.
8.3	Section I (Footprint) Data	Sum of questions A23(a) and A23(b) for jurisdictions which are listed in source 7 of Appendix D2 (corruption perception index).
9.1	TCB data	TA1(c)(i) - TA1(c)(v), displayed as a percentage of the total customers.
9.2	TCB data	Enhanced CDD % - TA13(i) - TA13(v) as a % of TA1(c)(i) - TA1(c)(v)
9.2	TCB data	Higher Risk % - TA14(i) - TA14(v) as a % of TA1(c)(i) - TA1(c)(v)
9.2	TCB data	TA15(i) - TA15(v) as a % of TA1(c)(i) - TA1(c)(v)

Page 10 - 14

Reference	Source	Calculation
10.1	TCB data	Customers Registered for a Foreign Tax Disclosure Facility - sum of TA24(a)(i) - TA24(k)(v)
10.1	TCB data	Sound Business Practice Policy - sum of TA23(a)(i) - TA23(k)(v)
11.2	TCB data	High Net Worth Customers - sum of TA21(a)(i) - TA21(k)(v)
12.1, 12.2	TCB data	Number of customers, by service provided- sum of TA2(i) - TA11(v)
13.1, 13.2	Section I (Footprint) Data	Employees - Jersey - Footprint Data, A18(i).
13.1, 13.2	Section I (Footprint) Data	Employees - non-Jersey - Footprint Data, A18(ii).
13.3	Section I (Footprint) Data	Compliance Employees - Jersey - Footprint Data, A19(i).
13.3	Section I (Footprint) Data	Compliance Employees - non-Jersey - Footprint Data, A19(ii).
13.3	Section I (Footprint) Data	Compliance Vacancies - Footprint Data, A20.
13.4	Section I (Footprint) Data	Compliance Employees as a % of all employees - (A19(i) + A19(ii)) as a % of (A18(i) + A18(ii))
14.1	TCB data	Customers where reliance has been placed on obliged persons - TCB Data VA3(a).
14.1	TCB data	Customers where reliance has been placed on persons in the same financial group - TCB Data VA3(b).
14.2	TCB data	Article 17 - TCB Data VA12(a) - VA12(f).
14.3	TCB data	Article 18 - TCB Data VA13(a) - L12(f).

Page 15 - 16

Reference	Source	Calculation
Customers from higher risk Jurisdictions (D2)	TCB data	Sum of UA1, for jurisdictions listed on the FATF grey-list or on three or more sources in Appendix D2, as a % of all jurisdictions.
Customers from higher risk Jurisdictions (GoJ TF)	TCB data	Sum of UA1, for jurisdictions listed as higher risk for terrorist financing on the GoJ list, as a % all jurisdictions.
Enhanced CDD %	TCB data	Sum of TA13 / sum of TA1(c).
Higher Risk Customer %	TCB data	Sum of TA14 / sum of TA1(c).
Higher Risk PEP %	Section I (Footprint) Data and TCB data	A23(a) + A23(b) for jurisdictions which are listed in source 7 of Appendix D2 divided by the sum of TA1(c).
PEP %	TCB data	Sum of TA15 / sum of TA1(c).
Reliance %	TCB data	Sum of VA3(a) / sum of TA1(c).