

Banking sector

Money laundering and terrorist financing risk data analysis



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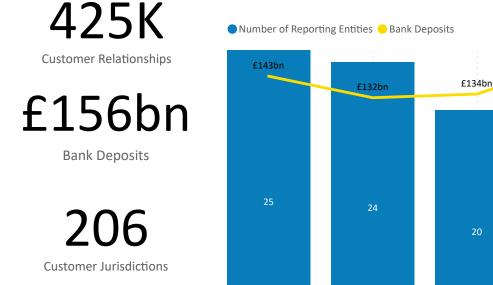
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This report forms part of a series which is being published to improve the understanding of money laundering across different sectors and activities. Key risk indicators are included for each sector to provide useful benchmarking for supervised persons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

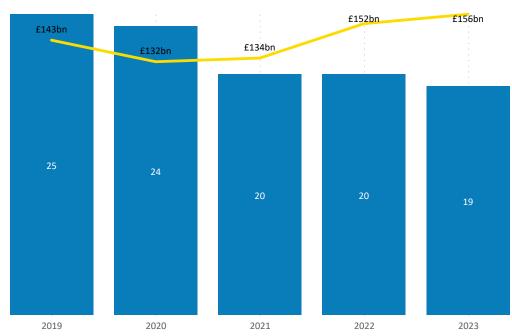
These reports are not risk assessments. Each report contains some explanation to support the aggregated data which is presented through a combination of graphs and tables. Whilst some data quality and integrity checks are performed on receipt of the data, we rely on the accuracy and completeness of data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



Sector overview



3,158 Employees



Banks in Jersey are diversified between well-known UK high street banks and global private banks. The sector provides traditional banking services to the local market together with corporate solutions for the investment funds industry and TCSPs, such as treasury specialists, together with international banking for expatriates and UK resident non-domiciled customers.

The banking sector is considered mature having been through a period of consolidation and restructuring over the last 35 years, to emerge with 19 banks registered at the end 2023. The level of bank deposits peaked at £212bn just prior to the Global Financial Crisis and hit a low of £113bn by 2016 before recovering to £156bn by the end of 2023.

Data analysed in this report is based on annual supervisory risk data submissions from banks for the period 2019 to 2023 and reflects data provided in respect of both deposit taking and lending undertaken by banks. Whilst some data quality and integrity checks are performed on receipt of the data, the JFSC is reliant on the banking sector for the accuracy and completeness of data provided.

The data collected includes a range of factors which can inform our view of risk at a national, sectoral and entity level. This includes the residence of banks' customers, exposure to higher risk customers and politically exposed persons (PEPs). 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 banking sector. For example, the data identifies 141,631 individuals that are Jersey resident as having a deposit taking connection with the sector (compared to an estimated population at the end of 2023 of 103,650), this highlights the multi-banked nature of the local population.



Customer residency

4.1 Top 10 jurisdictions - residence of customers 4.2 Top 10 jurisdictions - residence of or beneficial owners (deposit taking, 2023)

Total Customers or Jurisdiction **Beneficial Owners** 158.948 38 2% Jersey United Kingdom 90,744 21.8% Hong Kong 19,640 4.7% 19,033 **United Arab Emirates** 4.6% United States of America 11,869 2.8% 11,636 2.8% 7,495 France 1.8% 1.6% Spain 6,605 Australia 6,391 1.5% Greece 6,016 1.4%

customers or beneficial owners (lending, 2023)

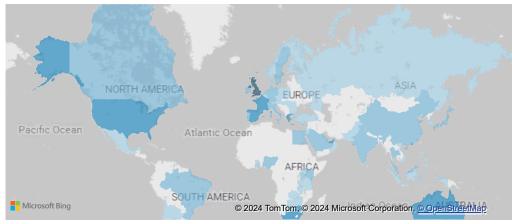
Jurisdiction	Total Customers or Beneficial Owners	% of Total ▼
Jersey	13,733	63.9%
United Kingdom	2,130	9.9%
Hong Kong	1,208	5.6%
United Arab Emirates	806	3.8%
Singapore	348	1.6%
Nigeria	258	1.2%
United States of America	253	1.2%
China	231	1.1%
Virgin Islands (British)	149	0.7%
Australia	140	0.7%

<u>Key</u>

Jurisdictions Listed in Appendix D2

Other Jurisdictions

4.3. Residence of customers or beneficial owners (deposit taking & lending, 2023)



Key: 100 - 999 Customers 1000 - 4,999 Customers 5,000 - 29,999 Customers 30,000 Customers or More

Country data is collected in respect of the residency of bank customers and the beneficial owners of customers which are not an individual. The data demonstrates the international nature of Jersey's financial services sector with customers reported from 206 different jurisdictions and 62% of the deposit customer relationships being with persons resident outside Jersey, with nearly 22% reported as being UK resident.

The top 10 jurisdictions are consistent with the locations of head offices of Jersey banks and Jersey Finance target jurisdictions and account for 81.2% of the reported deposit customer relationships.

It is notable that the distribution of bank lending customers shows a greater concentration of local relationships (63.9% Jersey and 9.9% UK).



Higher risk jurisdictions

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

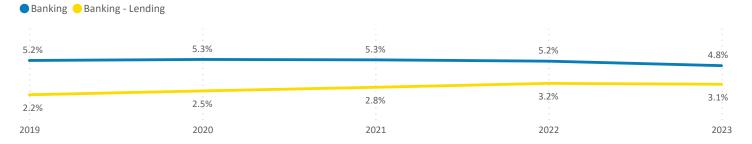
5.1 Deposit customers or beneficial owners who are resident in higher risk jurisdictions

Year	20:	19	20	20	20:	21	20:	22	202	23
Jurisdiction	Customers	% of Total								
South Africa	14,100	3.2%	12,737	3.2%	12,949	3.1%	13,320	3.1%	11,636	2.8%
Kenya	2,342	0.5%	1,940	0.5%	2,124	0.5%	2,171	0.5%	1,903	0.5%
Zimbabwe	1,552	0.3%	1,162	0.3%	1,183	0.3%	1,086	0.3%	944	0.2%
Nigeria	976	0.2%	1,014	0.3%	1,060	0.3%	1,141	0.3%	1,211	0.3%
Lebanon	329	0.1%	550	0.1%	899	0.2%	1,243	0.3%	1,467	0.4%

5.2 Lending customers or beneficial owners who are resident in higher risk jurisdictions

Year	20	19	202	20	202	21	20	22	202	23
Jurisdiction	Customers	% of Total								
Nigeria	148	0.5%	170	0.6%	219	0.8%	252	1.0%	258	1.2%
South Africa	174	0.6%	180	0.6%	206	0.7%	193	0.8%	138	0.6%
Kenya	134	0.4%	128	0.4%	155	0.5%	139	0.6%	128	0.6%
Monaco	33	0.1%	42	0.1%	48	0.2%	43	0.2%	26	0.1%
Lebanon	32	0.1%	35	0.1%	40	0.1%	31	0.1%	39	0.2%

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



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. 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 sources in Appendix D2. Of the 70 jurisdictions which meet this criteria, there are no connections to 12 jurisdictions and minimal connections (less than 0.05% of all customers) to 50 jurisdictions. In 2023, 4.2% of reported deposit-taking customer relationships and 2.7% of lending customer relationships are from higher risk jurisdictions with more than half of the deposit relationships from higher risk jurisdictions being from South Africa. Other prominent higher risk jurisdictions include Kenya, Lebanon, Nigeria, Zimbabwe and Monaco. It is important to note that Monaco and South Africa are included in the higher risk jurisdiction list solely as they currently appears 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.

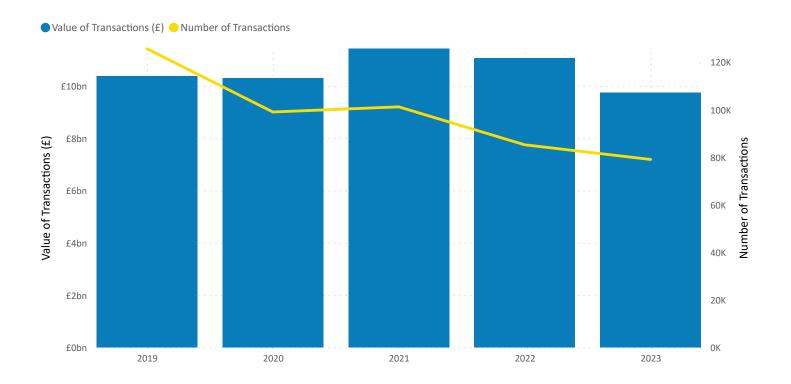


Wire transfers

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

6.1. Wire transfers to/from higher risk jurisdictions (2023)

Year	Incoming Value	Incoming Volume	Outgoing Value	Outgoing Volume
2019	5,599,839,527	31,010	4,727,584,562	88,191
2020	5,693,242,801	25,594	4,588,683,185	68,170
2021	5,464,890,007	25,043	5,909,998,028	67,940
2022	5,858,326,928	18,552	5,149,596,900	63,121
2023	4,867,557,725	16,428	4,818,496,625	58,069



Fund flow data collected from banks demonstrates that the total volume of wire transfers to or from higher risk jurisdictions has decreased over the reporting period from 119,201 transactions in 2019 to 74,497 in 2023. In 2023 transactions to or from higher risk jurisdictions accounted for approximately 0.5% of all transactions (by volume).

The value of these transactions increased between 2019 and 2021 but have since started to decrease driven mostly by fluctuations in the value of fund flows to and from South Africa. In 2023, the higher risk jurisdiction with the highest value of wire transfers to or from Jersey was South Africa (£5.4bn of total transactions). There were also material flows to or from Monaco (£882m) and Nigeria (£574m) which is consistent with banking customer jurisdictions (Page 4).



Higher risk jurisdictions

Jurisdictions that may present a higher risk of facilitating terrorist financing

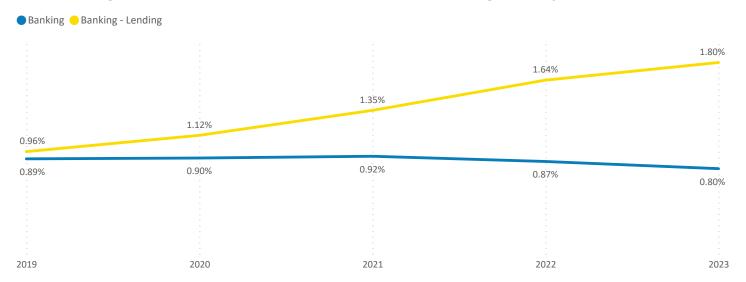
7.1. Deposit taking customers and beneficial owners resident in higher risk TF jurisdictions

Year	Customers	% of Total
2019	3,995	0.89%
2020	3,587	0.90%
2021	3,786	0.92%
2022	3,771	0.87%
2023	3,339	0.80%

7.2. Bank lending customers and beneficial owners resident in higher risk TF jurisdictions

Year	Customers	% of Total
2019	303	0.96%
2020	320	1.12%
2021	393	1.35%
2022	399	1.64%
2023	387	1.80%

7.3 Percentage of customers and beneficial owners resident in higher risk jurisdictions



Guidance on countries with higher risk of facilitating terrorist financing (gov.je) (Live Link)

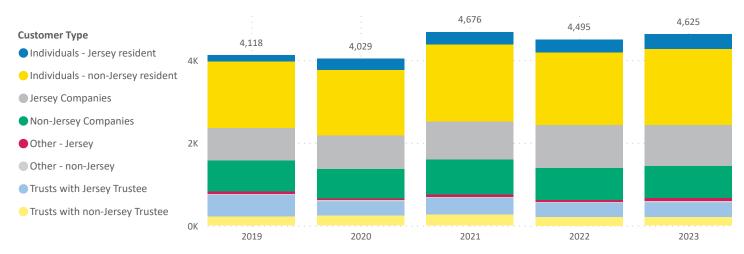
As part of the Government of Jersey's programme of combatting financial crime, guidance has been produced on specific countries that may present a higher risk of facilitating terrorist financing (TF). The analysis above is based on the jurisdictions listed as at July 2024 and highlights 0.8% of deposit customer relationships and 1.8% of lending customer relationships are reported from these jurisdictions. The vast majority of these connections are to customers from either Kenya or Nigeria. Of the 14 jurisdictions listed as higher risk for terrorist financing, there are no connections to residents of 5 jurisdictions and minimal connections to 7 jurisdictions (less than 0.05% of all customers).

The proportion of reported deposit customer relationships from higher risk jurisdictions for TF has decreased since 2021 due primarily to a reduction in the number of customers from Russia. Conversely, increased volumes of reported lending to customers from Nigeria, alongside a reduction in the total number of reported lending relationships, particularly to Jersey and UK resident customers, has resulted in the proportion of lending customers from higher risk jurisdictions for TF increasing from less than 1% in 2019 to 1.8% in 2023.



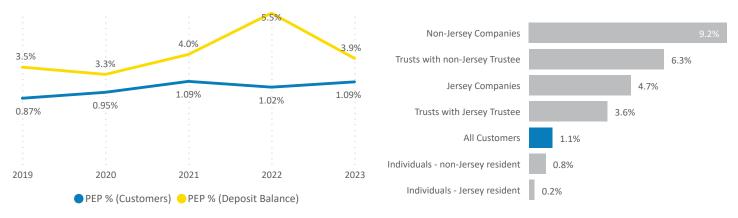
Politically exposed persons

8.1. PEP connections by customer type



8.2 Percentage of total customers who are, or are connected to, a PEP

8.3 Percentage of customers who are, or are connected to, a PEP - by customer type (2023)



The PEP data analysed uses a combination of responses from the footprint data collection (section I) and the banking sector data (section II). 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 section II data provides the number of customers who are, or are connected to, one or more PEP.

The total number of banking customers who are, or are connected to, a PEP has increased from 4,118 in 2019 to 4,625 in 2023 although this remains a small proportion of all customer relationships (1.1%). 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 or party 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.

The ratio of PEPs in 2023 is highest for non-Jersey companies (9.2%) and Trusts with a non-Jersey trustee (6.3%). The data collected also demonstrates that of all the PEP connections in the banking sector, 68% involved business relationships or one off transactions where property of the PEP was handled.

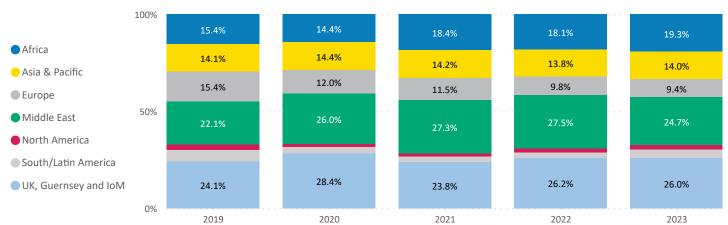


Politically exposed persons (jurisdictions)

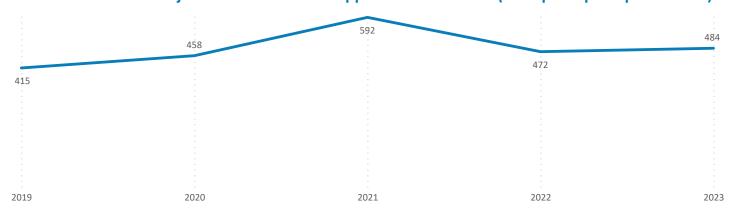
9.1. Non-Jersey PEP connections, by region (2023)

Continent	2019	2020	2021	2022	2023
Africa	15.4%	14.4%	18.4%	18.1%	19.3%
Asia & Pacific	14.1%	14.4%	14.2%	13.8%	14.0%
Europe	15.4%	12.0%	11.5%	9.8%	9.4%
Middle East	22.1%	26.0%	27.3%	27.5%	24.7%
North America	2.8%	1.6%	1.6%	2.0%	2.1%
South/Latin America	6.0%	3.2%	3.1%	2.6%	4.6%
UK, Guernsey and IoM	24.1%	28.4%	23.8%	26.2%	26.0%

9.2. Non-Jersey PEP connections, by region



9.3. PEP Connections - jurisdictions listed on appendix D2 source 7 (corruption perception index)



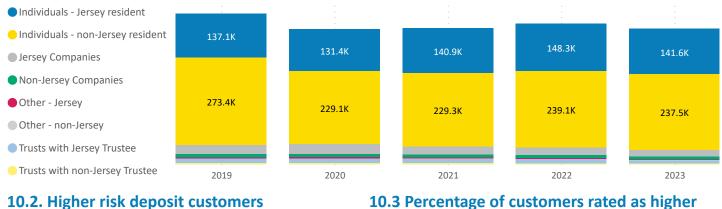
The section I (footprint) data provides the unique number of PEPs who are, or are connected to, one or more customers split by country.

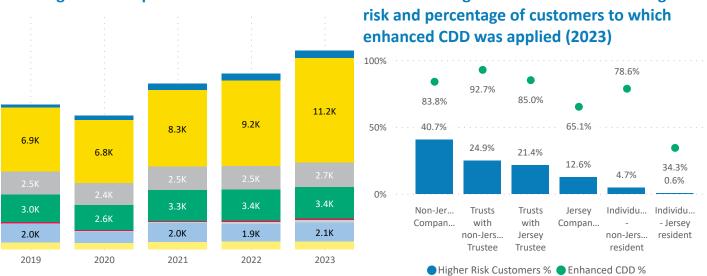
Jurisdictional data demonstrates that the banking sector in Jersey has connections to PEPs from a wide range of jurisdictions across all continents. This includes significant connections to PEPs from the United Kingdom, the Middle East, Africa and Asia. Source 7 of Appendix D2 utilises the Transparency International Corruption Perception Index and provides a list of jurisdictions which may present a higher risk of corruption. Overall, the number of connections to PEPs from one of these jurisdictions is stable throughout this period with the exception of 2021 when there was a temporary increase in PEP connections from one jurisdiction.



Deposit customer risk

10.1. Deposit customer type trends





Data collected from banks includes the risk ratings applied by banks to each customer and the number of customers for which enhanced CDD was applied. For deposit relationships the number considered higher risk has steadily increased since 2020 to stand at 5.0% of the total banking deposit relationships in 2023, the greatest increase relates to individual, non-Jersey resident customers.

Since 2019 the number of reported customer relationships has declined, due in part to a reduction in the number of banks registered. Individual - Jersey resident customers are reported as lowest risk with only 0.6% of deposit relationships rated as higher risk.

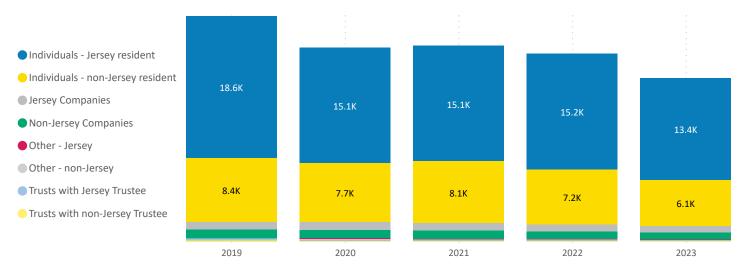
The two highest risk customer types are reported as non-Jersey companies (40.7% of deposit customers rated as higher risk) and trusts with a non-Jersey trustee (24.9% of deposit customers rated as higher risk).

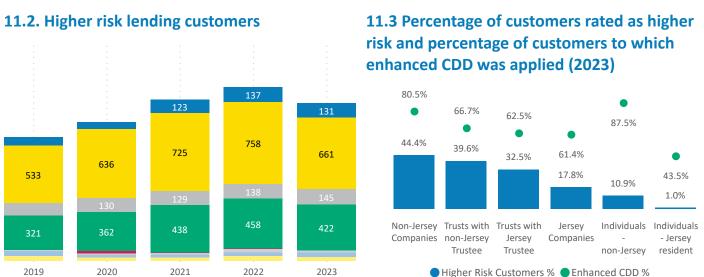
Whilst the number of higher risk customers is relatively low, enhanced customer due diligence measures are applied extensively which is expected given the nature of the relationships and the requirements of the MLO.



Lending customer risk

11.1. Lending customer trends





As with deposit customers, the number of reported lending customer relationships has declined since 2019.

Individual - Jersey resident customers are reported as lowest risk with 1.0% of lending relationships customers rated as higher risk. The two highest risk customer types are reported as non-Jersey companies (44.4% of lending customers rated as higher risk) and trusts with a non-Jersey trustee (39.6% of lending customers rated as higher risk).

Whilst the number of higher risk customers is relatively low, enhanced customer due diligence measures are applied extensively, particularly amongst non-Jersey resident customers.

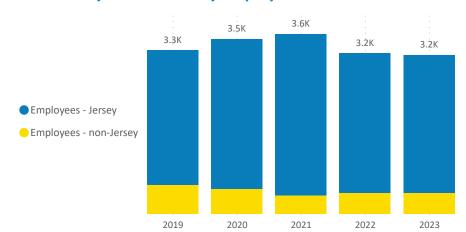


Banking sector employees

12.1. Employee trend

Year	Employees - Jersey	Employees - non-Jersey
2019	2,677	578
2020	2,983	495
2021	3,207	370
2022	2,779	416
2023	2,739	419

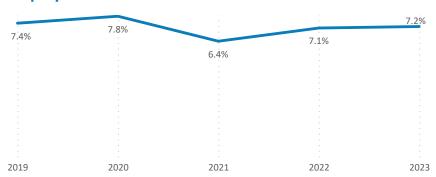
12.2. Jersey and non-Jersey employees



12.3. Compliance and risk employee trends

Year	Compliance and Risk Employees, Jersey	Compliance and Risk Employees, Non-Jersey	Compliance and Risk Vacancies
2019	175	54	12
2020	208	42	21
2021	185	29	15
2022	175	32	21
2023	179	34	15

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



Bank employee data covers all individuals employed by banks, not just those associated with the deposit and lending business. For example, this may include bank employees working in investment business activity within the bank. Data collected from banks demonstrates that at the end of 2023 there were the lowest number of employees reported as working in the banking sector since 2019, 3,158 as against a high of 3,577 in 2021. This is in part due to a reduction in the number of banks registered during this period.

The proportion of bank employees based outside of Jersey has decreased overall since 2019 (17.8% against 2023 13.3%) but has been steadily increasing since the reported low in 2021 of 10.3%.

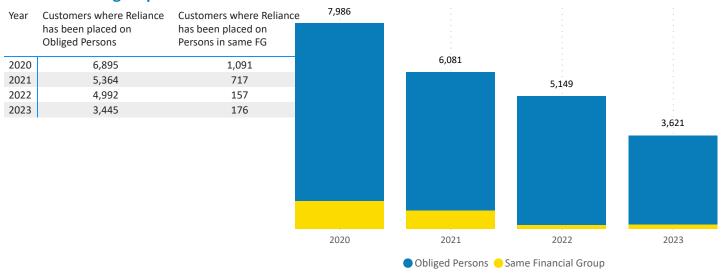
The number of reported Compliance and Risk roles (employed plus vacancies) compared to the number of reported employees has fluctuated between 6.4% (2021) and 7.8% (2020). This position has stabilised between 2022 and 2023 at about 7.2%. Over the same period, the number of reported vacancies decreased from 9% in 2022 to 7% in 2023.

The proportion of bank employees based outside of Jersey has decreased overall since 2019 (17.8% against 2023 13.3%) but has been steadily increasing since the reported low in 2021 of 10.3%. In Compliance and Risk the proportion of roles filled by an individual based outside of Jersey stands at 16.0% in 2023, a decrease from the reported high in 2019 of 23.6% but an increase on the low reported in 2021 of 13.6%.



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

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



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

		2021			
Article 17 Article 18	162	179	191	230	
Article 18	1,555	2,448	2,617	2,792	

Reliance (Article 16 of the MLO): Use of reliance across the whole sector has continued to decrease including for corporate banks although its use is still more prevalent than in retail banks – see page 14.

Between 2020 and 2023 there has been a 50% reduction in the use of obliged persons and 84% reduction in respect of persons in the same financial group. Use of the regime is not widespread and is almost exclusively used for deposit relationships rather than lending.

Exemption from applying 3rd party identification requirements (Article 17B-D of the MLO): Use of the exemption remains very rare. The number of customer relationships where the exemption has been used has been stable across the period 2020 to 2023 and is reported as being used in respect of just 0.05% 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. The exemption is most widely used where the relationship is with a regulated business or the employee of a regulated business and in 2023 was reported as being used in respect of 0.6% of the total reported customer relationships.



Key risk indicators

The data summarised demonstrates some key risk indicators which can inform our view of risk across the banking sector. This includes inherent risk factors such as customers from higher risk jurisdictions and PEP connections as well as the application of enhanced CDD, and reliance on obliged persons. For the banking sector, this analysis has been split between banks with a high street presence in Jersey (Retail Banks) and banks which primarily provide corporate banking solutions. 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.

Share of total customers

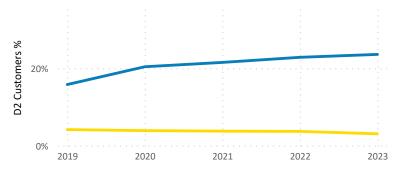
Sub-sector	2019	2020	2021	2022	2023
Corporate Bank	9%	9%	9%	8%	9%
Retail Bank	91%	91%	91%	92%	91%

Share of deposits

Sub-sector	2019	2020	2021	2022	2023
Corporate Bank	57%	48%	46%	52%	59%
Retail Bank	43%	52%	54%	48%	41%

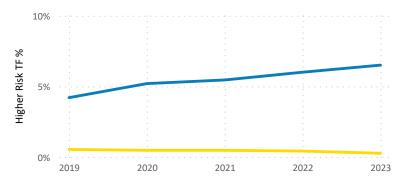
14.1. Key risk indicators - all banks

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2019	5.2%	0.89%	3.3%
2020	5.3%	0.90%	3.4%
2021	5.3%	0.92%	4.2%
2022	5.2%	0.87%	4.3%
2023	4.8%	0.80%	5.0%



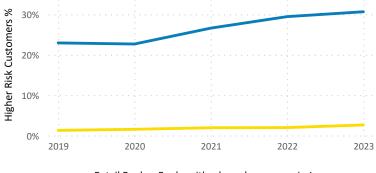
14.2. Key risk indicators - retail banks

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2019	4.1%	0.54%	1.3%
2020	3.9%	0.48%	1.5%
2021	3.7%	0.48%	1.9%
2022	3.7%	0.43%	2.0%
2023	3.0%	0.27%	2.6%



14.3. Key risk indicators - corporate banks

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2019	15.8%	4.21%	22.9%
2020	20.4%	5.20%	22.7%
2021	21.5%	5.46%	26.6%
2022	22.9%	6.01%	29.5%
2023	23.6%	6.51%	30.7%



Retail Banks - Banks with a branch presence in Jersey

Corporate Banks - All other banks



Key risk indicators

15.1. Key risk indicators - all Banks

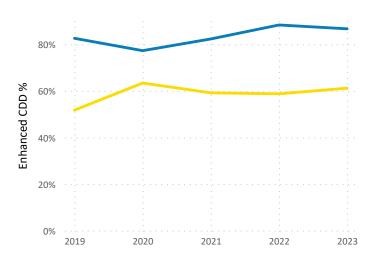
Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2019	0.87%	0.09%	55%	1.6%
2020	0.95%	0.11%	65%	1.6%
2021	1.09%	0.14%	61%	1.2%
2022	1.02%	0.11%	61%	1.1%
2023	1.09%	0.11%	63%	0.8%

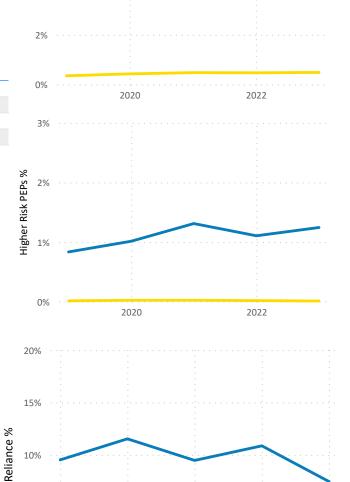
15.2. Key risk indicators - retail banks

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %	
2019	0.35%	0.01%	52%	0.8%	Ī
2020	0.43%	0.02%	63%	0.7%	
2021	0.48%	0.02%	59%	0.4%	
2022	0.47%	0.02%	59%	0.2%	
2023	0.49%	0.01%	61%	0.2%	

15.3. Key risk indicators - corporate banks

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2019	5.93%	0.83%	83%	9.5%
2020	6.40%	1.01%	77%	11.5%
2021	7.27%	1.31%	82%	9.5%
2022	6.98%	1.10%	88%	10.9%
2023	7.53%	1.24%	87%	7.4%





2019

2020

2021

2022

2023

Key Retail Banks - Banks with a branch presence in Jersey

Corporate Banks - All other banks



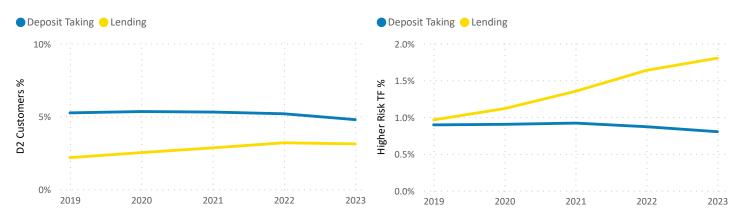
Key risk indicators

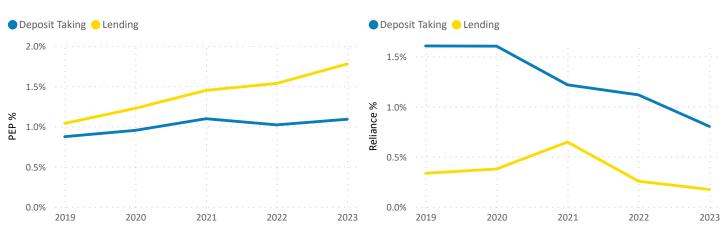
16.1. Key risk indicators - deposit customers

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %	PEP %	Enhanced CDD %	Reliance %
2019	5.2%	0.89%	3.3%	0.87%	55%	1.6%
2020	5.3%	0.90%	3.4%	0.95%	65%	1.6%
2021	5.3%	0.92%	4.2%	1.09%	61%	1.2%
2022	5.2%	0.87%	4.3%	1.02%	61%	1.1%
2023	4.8%	0.80%	5.0%	1.09%	63%	0.8%

16.2. Key risk indicators - lending customers

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %	PEP %	Enhanced CDD %	Reliance %
2019	2.2%	0.96%	3.9%	1.04%	72%	0.3%
2020	2.5%	1.12%	5.0%	1.22%	68%	0.4%
2021	2.8%	1.35%	5.8%	1.45%	56%	0.6%
2022	3.2%	1.64%	6.5%	1.53%	57%	0.3%
2023	3.1%	1.80%	6.8%	1.78%	59%	0.2%







Appendix 1 - references

Supervisory risk data guidance

Section I (footprint) data <u>Guidance to Section I of risk based supervision data 2023 — Jersey Financial Services Commission (jerseyfsc.org)</u>

Section II (banking) data <u>Guide to Section II of risk based supervision data: Deposit-takers 2023 — Jersey Financial Services Commission (jerseyfsc.org)</u>

Section III (wire transfer) data <u>Guide to Section III of risk based supervision data: Wire transfer 2023 — Jersey Financial Services Commission (jerseyfsc.org)</u>

Appendix D2

<u>Appendix D2 – Countries and territories identified as presenting higher risks — Jersey Financial Services Commission</u> (<u>jerseyfsc.org</u>)

Government of Jersey higher risk jurisdictions for terrorist financing Guidance on countries with higher risk of facilitating terrorist financing (gov.je)



Appendix 2 - glossary

Reference	Source	Calculation
4.1	Bank Deposit Data	Sum of questions K1 and K2, by jurisdiction. Top 10 jurisdictions by total volume.
4.2	Bank Lending Data	Sum of questions KA1 and KA2, by jurisdiction. Top 10 jurisdictions by total volume.
4.3	Bank Deposit Data & Bank Lending Data	Sum of questions K1, K2, KA1 & KA2, by jurisdiction
5.1	Bank Deposit Data	Sum of question K1 and K2, 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.
5.2	Bank Lending Data	Sum of question KA1 and KA2, 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.
5.3	Bank Deposit Data & Bank Lending Data	Sum of question K1, K2, KA1 and KA2 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	Wire Transfer Data	Incoming Wire Transfer Value - ZX9b + ZX10b
6.1	Wire Transfer Data	Incoming Wire Transfer Volume - ZX9a + ZX10a
6.1	Wire Transfer Data	Outgoing Wire Transfer Value - ZX6b + ZX7b
6.1	Wire Transfer Data	Outgoing Wire Transfer Volume - ZX6a + ZX7a
7.1	Bank Deposit Data	Sum of question K1 and K2, for jurisdictions listed in GoJ list. Values are displayed as a % of the total across all jurisdictions.
7.2	Bank Lending Data	Sum of question KA1 and KA2, for jurisdictions listed in GoJ list. Values are displayed as a % of the total across all jurisdictions.
7.3	Bank Deposit Data & Bank Lending Data	Sum of question K1, K2, KA1 and KA2, for jurisdictions listed in GoJ list. Values are displayed as a % of the total across all jurisdictions.
8.1	Bank Deposit Data	Sum of questions J6(a)(i) - J6(a)(viii)
8.2	Bank Deposit Data	PEP % (Customers) - Sum of questions J6(a)(i) - J6(a)(viii) as a percentage of J1(a)(i) - J1(a)(viii)
8.2	Bank Deposit Data	PEP % (Deposit Balance) - Sum of questions $J6(b)(i)$ - $J6(b)(viii)$ as a percentage of $J1(b)(i)$ - $J1(b)(viii)$
8.3	Bank Deposit Data	PEP % (Customers) - Questions J6(a)(i) - J6(a)(viii) as a percentage of J1(a)(i) - J1(a)(viii)
9.1, 9.2	Section I (Footprint) Data	Sum of questions A23(a) and A23(b), aggregated by region.
9.3	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).



Reference •	Source	Calculation
10.1	Bank Deposit Data	Deposit Customers - J1(a)(i) - J1(a)(viii)
10.2	Bank Deposit Data	Higher risk for ML/TF - sum of J5(a)(i) - J5(a)(viii)
10.3	Bank Deposit Data	Enhanced CDD % - J4(a)(i) - J4(a)(viii) as a % of J1(a)(i) - J1(a)(viii)
10.3	Bank Deposit Data	Higher Risk Customer % - J5(a)(i) - J5(a)(viii) as a % of J1(a)(i) - J1(a)(viii)
11.1	Bank Lending Data	Lending Customers - JA1(a)(i) - JA1(a)(viii)
11.2	Bank Lending Data	Higher risk for ML/TF - sum of JA5(a)(i) - JA5(a)(viii)
11.3	Bank Lending Data	Enhanced CDD % - JA4(a)(i) - JA4(a)(viii) as a % of JA1(a)(i) - JA1(a)(viii)
11.3	Bank Lending Data	Higher Risk Customer % - JA5(a)(i) - JA5(a)(viii) as a % of JA1(a)(i) - JA1(a)(viii)
12.1, 12.2	Section I (Footprint) Data	Employees - Jersey - Footprint Data, A18(i).
12.1, 12.2	Section I (Footprint) Data	Employees - non-Jersey - Footprint Data, A18(ii).
12.3	Section I (Footprint) Data	Compliance Employees - Jersey - Footprint Data, A19(i).
12.3	Section I (Footprint) Data	Compliance Employees - non-Jersey - Footprint Data, A19(ii).
12.3	Section I (Footprint) Data	Compliance Vacancies - Footprint Data, A20.
12.4	Section I (Footprint) Data	Compliance Employees as a % of all employees - (A19(i) + A19(ii)) as a % of (A18(i) + A18(ii))
13.1	Bank Deposit Data	Customers where reliance has been placed on obliged persons - L3(a).
13.1	Bank Deposit Data	Customers where reliance has been placed on persons in the same financial group - L3(b).
13.2	Bank Deposit Data	Article 17 - L11(a) - L11(h).
13.3	Bank Deposit Data	Article 18 - L12(b) - L12(f).



Page	Reference	Source	Calculation
Page 14	Customers from higher risk Jurisdictions (D2)	Bank Deposit Data & Bank Lending Data	Sum of questions K1, K2, KA1, KA2, for jurisdictions listed on the FATF grey-list or on three or more sources in Appendix D2, as a % of all jurisdictions.
Page 14	Customers from higher risk Jurisdictions (GoJ TF)	Bank Deposit Data & Bank Lending Data	Sum of questions K1, K2, KA1, KA2, for jurisdictions listed as higher risk for terrorist financing on the GoJ list, as a % all jurisdictions.
Page 14	Higher Risk Customer %	Bank Deposit Data & Bank Lending Data	Sum of (J5(a)(i) - J5(a)(viii), JA5(a)(i) - JA5(a)(viii)) / sum of (J1(a)(i) - J1(a)(viii), JA1(a)(i) - JA1(a)(viii))
Page 15	Enhanced CDD %	Bank Deposit Data & Bank Lending Data	Sum of (J4(a)(i) - J4(a)(viii), JA4(a)(i) - JA4(a)(viii)) / sum of (J1(a)(i) - J1(a)(viii), JA1(a)(i) - JA1(a)(viii))
Page 15	Higher Risk PEP %	Section I (Footprint) Data & Bank Deposit Data	A23(a) + A23(b) for jurisdictions which are listed in source 7 of Appendix D2 divided by the sum of J1(a)(i) - J1(a)(viii).
Page 15	PEP %	Bank Deposit Data & Bank Lending Data	Sum of (J6(a)(i) - J6(a)(viii), JA6(a)(i) - JA6(a)(viii)) / sum of (J1(a)(i) - J1(a)(viii), JA1(a)(i) - JA1(a)(viii))
Page 15	Reliance %	Bank Deposit Data & Bank Lending Data	sum of (L3(a), L3(b), LA3(a), LA3(b)) / sum of (J1(a)(i) - J1(a)(viii), JA1(a)(i) - JA1(a)(viii))
Page 16	Deposit - Customers from higher risk Jurisdictions (D2)	Bank Deposit Data	Sum of questions K1 and K2, for jurisdictions listed on the FATF grey-list or on three or more sources in Appendix D2, as a % of all jurisdictions.
Page 16	Deposit - Customers from higher risk Jurisdictions (GoJ TF)	Bank Deposit Data	Sum of questions K1 and K2, for jurisdictions listed as higher risk for terrorist financing on the GoJ list, as a % all jurisdictions.
Page 16	Deposit - Enhanced CDD %	Bank Deposit Data	Sum of $J4(a)(i)$ - $J4(a)(viii)$ divided by the sum of $J1(a)(i)$ - $J1(a)(viii)$.
Page 16	Deposit - Higher Risk Customer %	Bank Deposit Data	Sum of J5(a)(i) - J5(a)(viii) / sum of J1(a)(i) - J1(a)(viii).
Page 16	Deposit - PEP %	Bank Deposit Data	Sum of J6(a)(i) - J6(a)(viii) / sum of J1(a)(i) - J1(a)(viii).
Page 16	Deposit - Reliance %	Bank Deposit Data	sum of L3(a) + L3(b) as a % of J1(a)(i) - J1(a)(viii).
Page 16	Lending - Customers from higher risk Jurisdictions (D2)	Bank Lending Data	Sum of questions KA1 and KA2, for jurisdictions listed on the FATF grey-list or on three or more sources in Appendix D2, as a % of all jurisdictions.
Page 16	Lending - Customers from higher risk Jurisdictions (GoJ TF)	Bank Lending Data	Sum of questions KA1 and KA2, for jurisdictions listed as higher risk for terrorist financing on the GoJ list, as a % all jurisdictions.
Page 16	Lending - Enhanced CDD %	Bank Lending Data	Sum of JA4(a)(i) - JA4(a)(viii) divided by the sum of JA1(a) (i) - JA1(a)(viii).
Page 16	Lending - Higher Risk Customer %	Bank Lending Data	Sum of JA5(a)(i) - JA5(a)(viii) / sum of JA1(a)(i) - JA1(a) (viii).
Page 16	Lending - PEP %	Bank Lending Data	Sum of JA6(a)(i) - JA6(a)(viii) / sum of JA1(a)(i) - JA1(a) (viii).
Page 16	Lending - Reliance %	Bank Lending Data	sum of LA3(a) + LA3(b) as a % of JA1(a)(i) - JA1(a)(viii).