



Jersey Financial  
Services Commission

# Trust company business sector

Money laundering and terrorist  
financing risk data analysis

December 2025

[www.jerseyfsc.org](http://www.jerseyfsc.org)

## Contents

3. Sector overview
4. Customer residency
5. Higher risk jurisdictions (money laundering - static)
6. Higher risk jurisdictions (money laundering - dynamic)
7. Higher risk jurisdictions (terrorist financing)
8. Politically exposed persons
9. Politically exposed persons (jurisdictions)
10. Customer risk
11. High net worth customers and use of tax disclosure facilities
12. Trust Company Business services provided
13. Trust Company Business sector employees
14. Reliance on obliged persons and Money Laundering Order exemptions
- 15 - 16. Key risk indicators
17. Appendix 1 - references
- 18 - 19. Appendix 2 - glossary

This report forms part of a series which is being published to improve the understanding of money laundering and terrorist financing risk within a number of sectors, and to enable a comparison 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

**£1.3T**

Assets Under Management

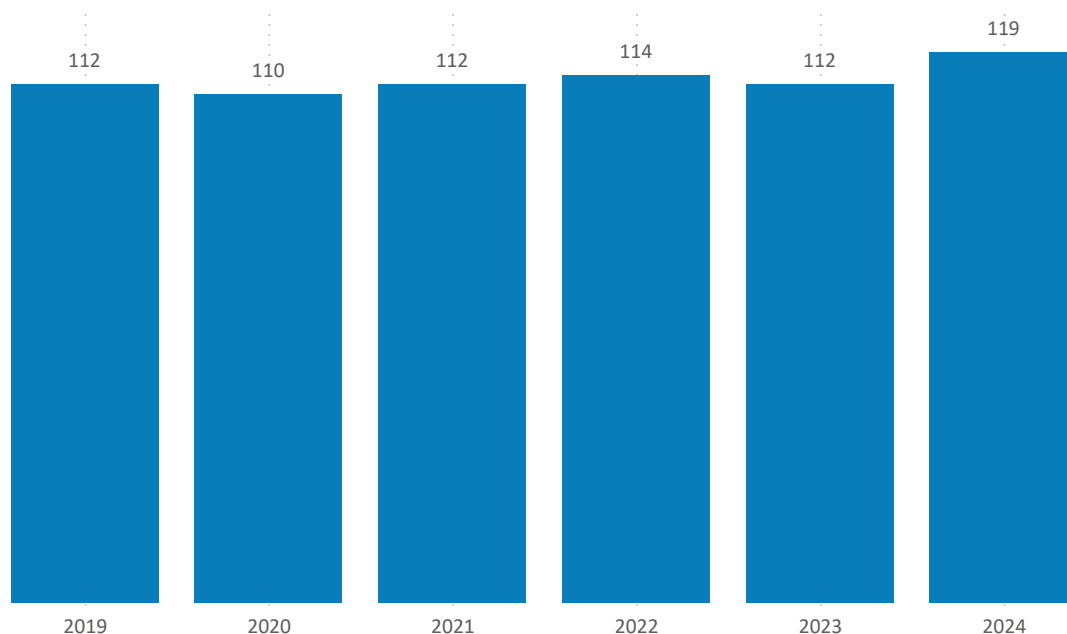
**5,681**

Employees

**175**

Customer Jurisdictions

**Number of reporting entities (affiliation leaders and standalone trust company businesses)**



Jersey has a large and significant trust company business (TCB) sector directly employing nearly 5,500 individuals and with a geographical reach that is second only to the banking sector in Jersey (TCB: 175 jurisdictions, Banking: 205). As at October 2025, our website listed 776 persons registered to carry on trust company business activity, including natural persons and participating members, which is a stable position on 2023. The reported customer relationships remain stable at 66k with assets under management at the end of 2024 indicated at £1.3 trillion.

Data analysed in this report is based on annual supervisory risk data submissions from Affiliation Leaders and standalone TCBs for the period 2020 to 2024. 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, we are 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 £1.3 trillion reported by the sector for 2024 should be considered as an indicative value.

## Customer residency

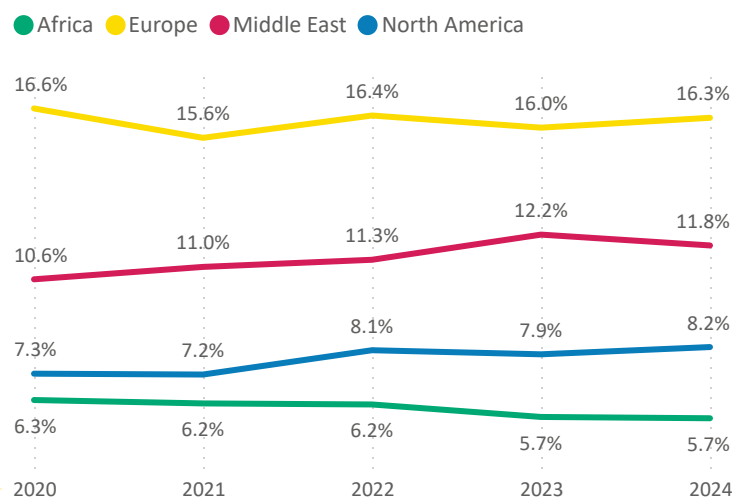
### 4.1. Top 10 jurisdictions - residence of non-Jersey customers or beneficial owners (2024)

Jurisdiction	Total Customers or Beneficial Owners	% of Total
United Kingdom	20,646	44.8%
United States of America	3,329	7.2%
United Arab Emirates	1,477	3.2%
South Africa	1,415	3.1%
Saudi Arabia	1,349	2.9%
Switzerland	1,269	2.8%
Hong Kong	1,091	2.4%
Kuwait	998	2.2%
Ireland	859	1.9%
Singapore	630	1.4%

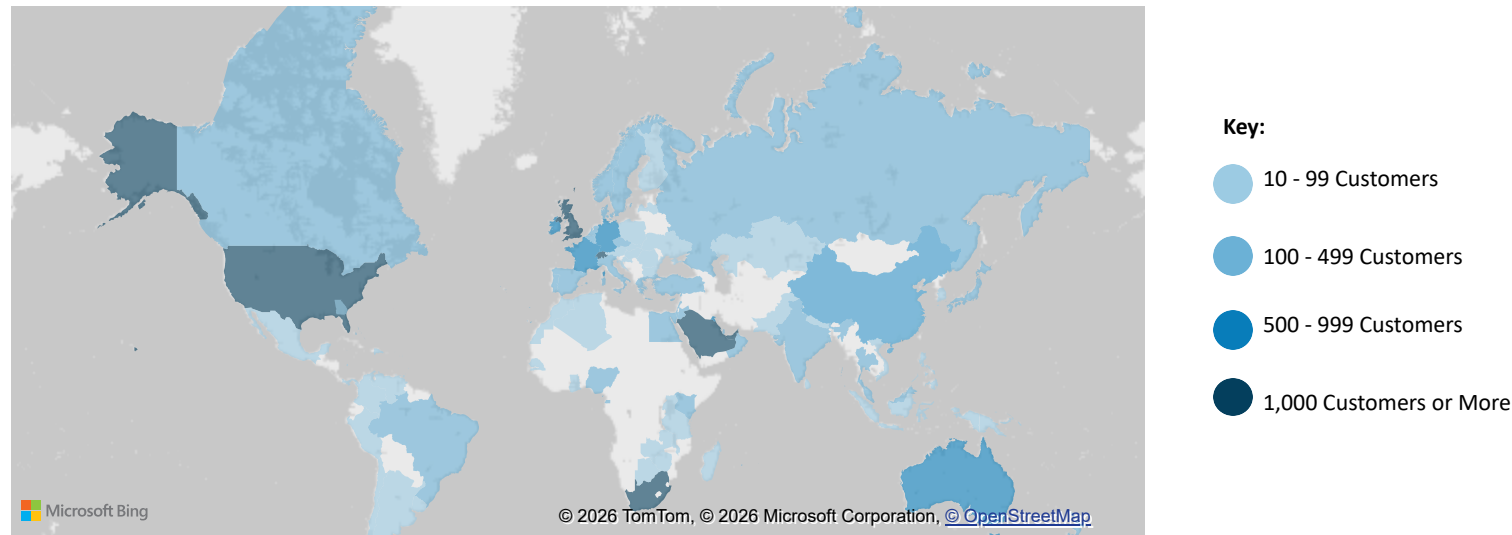
**Key:** Jurisdictions Listed in Appendix D2

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 (2024)



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 175 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 and account for 71.9% of the reported customer relationships (2023: 72.1%).

In 2024, UK customers account for 44.8% of non-Jersey relationships, down slightly from prior years, while reported relationships with other regions remain stable.

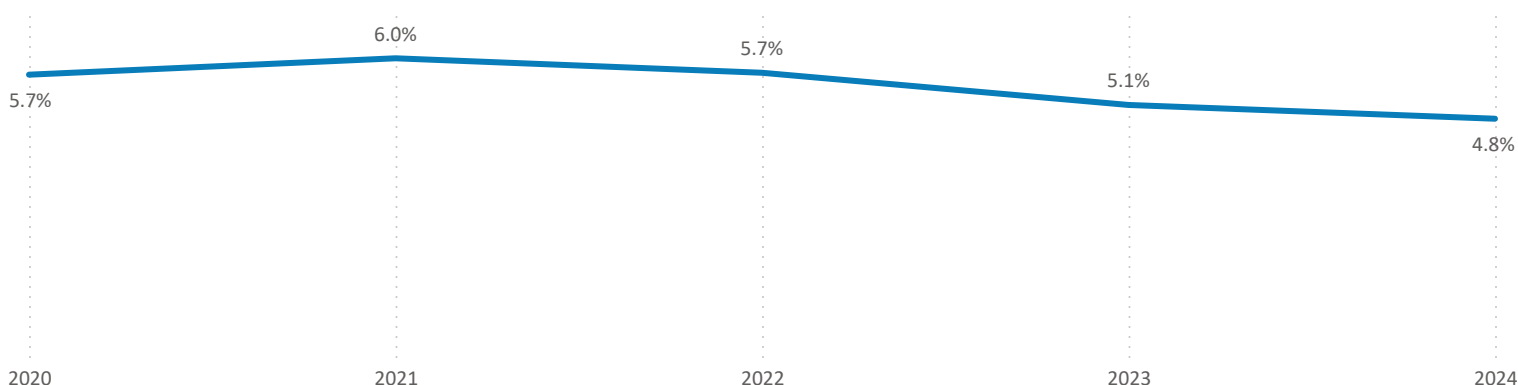
## Higher risk jurisdictions

### *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	2020		2021		2022		2023		2024	
Jurisdiction	Customers	% of Total	Customers	% of Total	Customers	% of Total	Customers	% of Total	Customers	% of Total
Kenya	510	1.1%	709	1.4%	659	1.4%	434	1.0%	414	0.9%
Monaco	407	0.9%	446	0.9%	417	0.9%	418	0.9%	396	0.9%
Lebanon	325	0.7%	410	0.8%	441	0.9%	396	0.9%	373	0.8%
China	300	0.7%	281	0.6%	309	0.6%	270	0.6%	275	0.6%
Russian Federation	246	0.5%	271	0.5%	153	0.3%	136	0.3%	107	0.2%

#### 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 \(jerseyfsc.org\)](https://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 uses the jurisdictions listed in Appendix D2 at October 2025 as the base for analysing 2020 - 2024 data - 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 65 jurisdictions which meet this criteria, there were no customer connections to residents of 22 jurisdictions and minimal connections (less than 0.05% of the sector total) to another 33 jurisdictions.

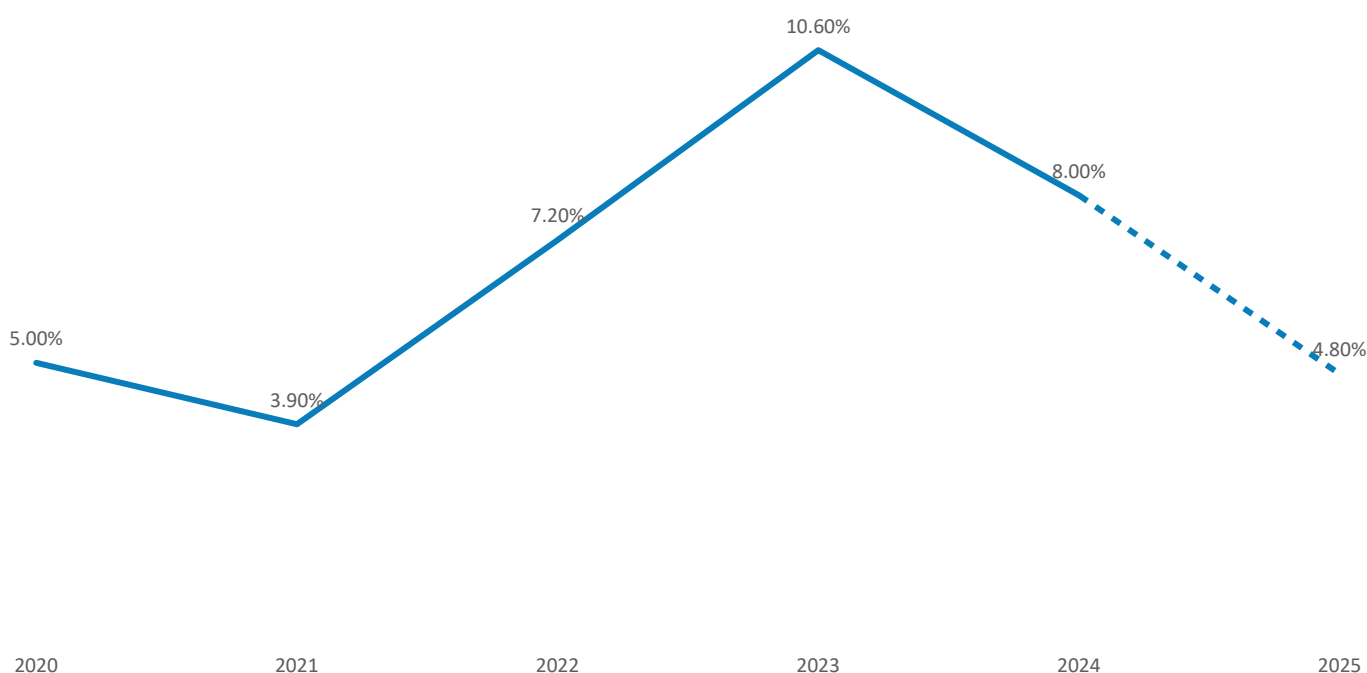
Exposure to higher-risk jurisdictions fell to 4.8% in 2024, down from 6% in 2021, driven by reduced connections to Kenya and Russia. Russian Federation exposure declined to 0.2%, reflecting geopolitical and sanctions pressures.

It is important to note that Monaco is 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).

## Higher risk jurisdictions

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

#### 6.1 Customers or beneficial owners who are resident in higher risk jurisdictions



#### Notable Changes to the FATF Grey List

Attribute	2020	2021	2022	2023	2024	2025
Grey List Additions	Mauritius	Cayman Islands	UAE	South Africa, Nigeria	Kenya, Monaco	BVI
Grey List Removals		Mauritius		Cayman Islands	UAE	South Africa, Nigeria

Figure 6.1 illustrates the impact of changes in Appendix D2 over time, in contrast to the previous page, which presents a snapshot of the current Appendix D2 and tracks customer numbers over time. Specifically, this view demonstrates how the addition and removal of jurisdictions from the FATF grey list has influenced exposure to higher-risk countries. The 2025 data point shown above is a reflection of the 2024 data and the most recent update to Appendix D2 (October 2025).

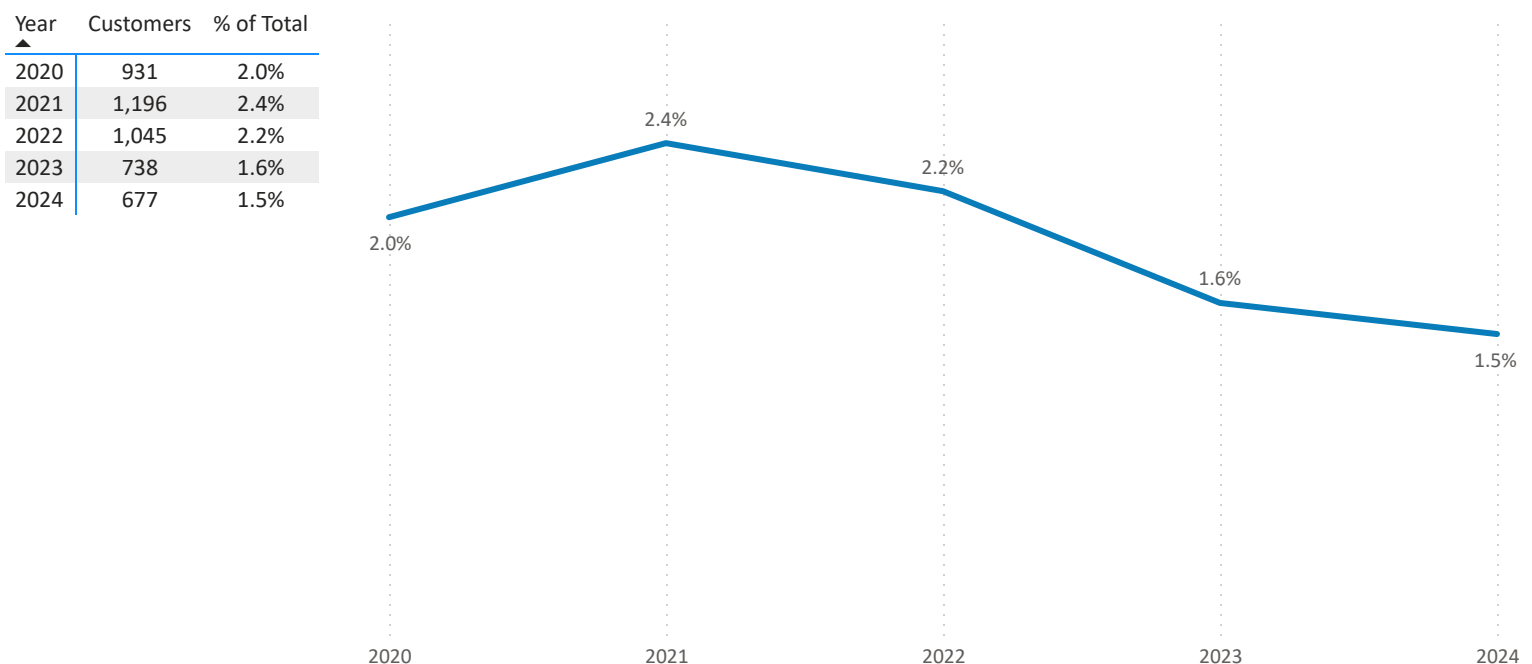
Exposure to higher-risk jurisdictions peaked in 2023, when both South Africa and the United Arab Emirates were on the grey list. The removal of South Africa and UAE from the grey list reduced exposure by 54% from its 2023 peak, demonstrating how FATF actions directly influence Jersey's risk profile. This change reflects progress as jurisdictions with significant connections to Jersey have addressed shortcomings in their AML/CFT frameworks, resulting in a potentially more favourable geographical risk environment for Jersey.



## Higher risk jurisdictions

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

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



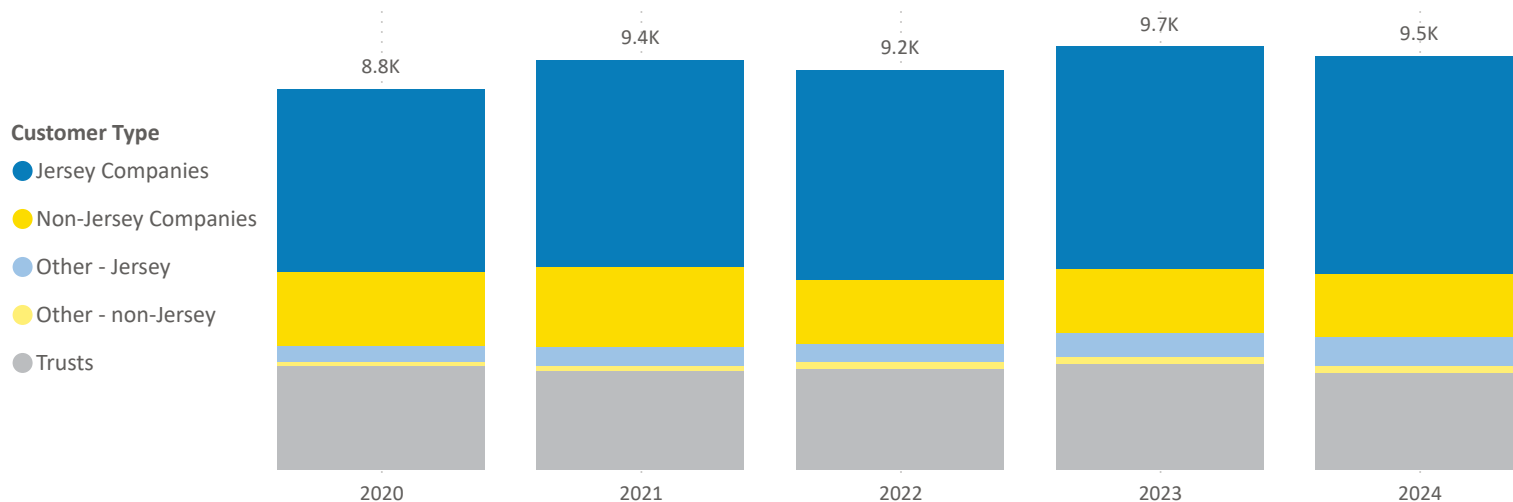
#### [Guidance on countries with higher risk of facilitating terrorist financing \(gov.je\)](https://www.gov.je)

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

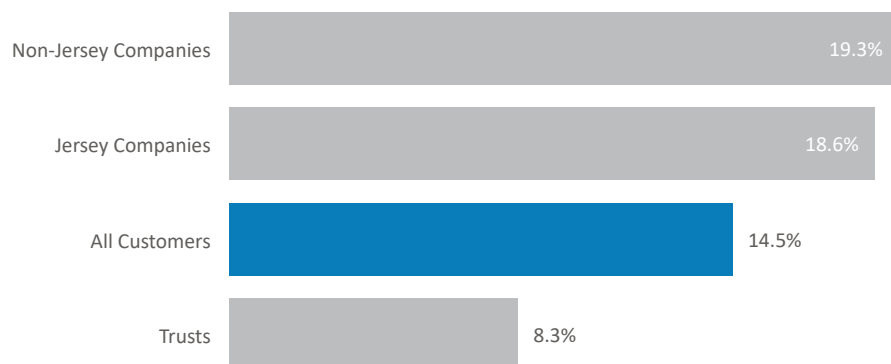
The analysis above is based on the jurisdictions identified and reported in September 2023 and highlights connections to these jurisdictions posing a terrorist financing risk continues to decrease; 1.5% in 2024, compared to the high of 2.4% in 2021. This reduction is primarily due to fewer relationships with residents of Russia and Kenya.

## Politically exposed persons

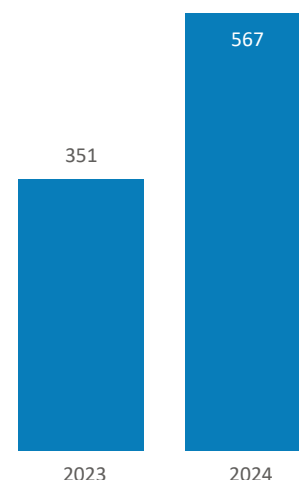
### 8.1 PEP connections by customer type



### 8.2 Percentage of customers who are, or are connected to, a PEP (2024)



### 8.3 PEPs Declassified



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.

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. The overall number of PEP connections fell slightly from 9.7k in 2023 to 9.5k in 2024, due in part to increased declassification of PEPs in 2024.

Whilst the total number of PEP connections fell slightly in 2024, PEP exposure remains significant at 14.5% of all customers in 2024, with the highest ratios among non-Jersey companies (19.3%) and Jersey companies (18.6%).



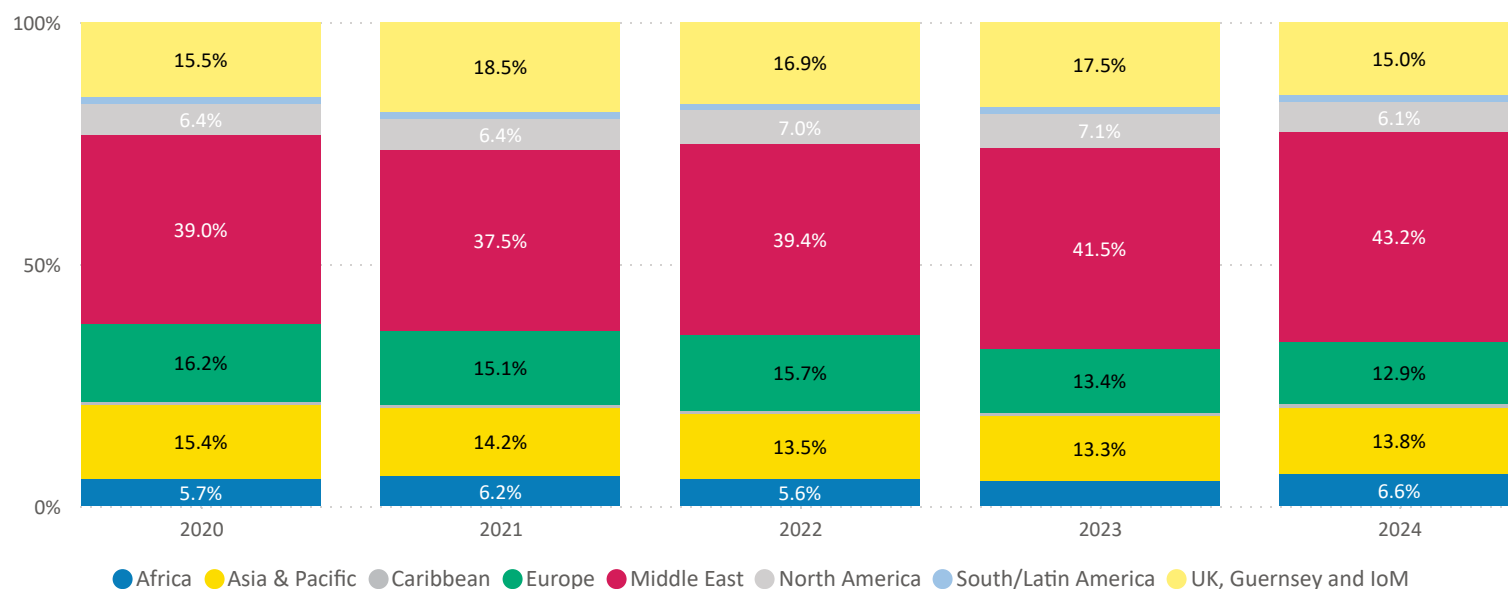
## Politically exposed persons (jurisdictions)

### 9.1 Non-Jersey PEP connections, by region

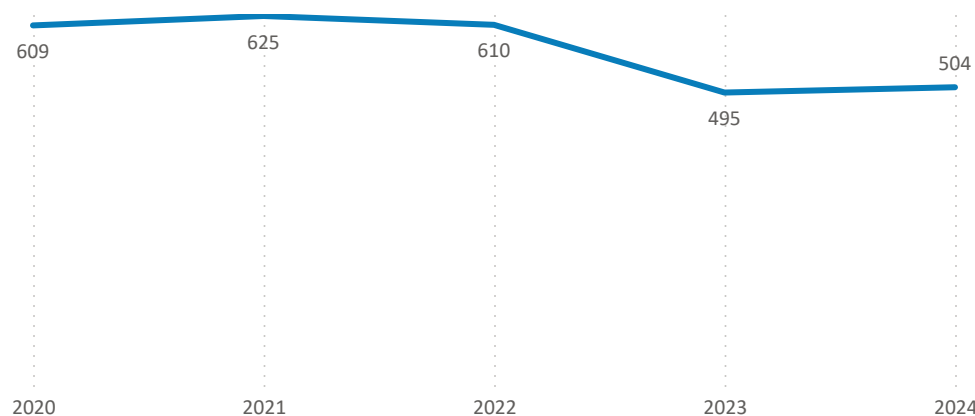
Region	2020	2021	2022	2023	2024
Middle East	39.0%	37.5%	39.4%	41.5%	43.2%
UK, Guernsey and IoM	15.5%	18.5%	16.9%	17.5%	15.0%
Europe	16.2%	15.1%	15.7%	13.4%	12.9%
Asia & Pacific	15.4%	14.2%	13.5%	13.3%	13.8%
North America	6.4%	6.4%	7.0%	7.1%	6.1%
Africa	5.7%	6.2%	5.6%	5.2%	6.6%
South/Latin America	1.4%	1.4%	1.4%	1.4%	1.6%
Caribbean	0.4%	0.7%	0.5%	0.6%	0.7%

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 (2020: 39.0%, 2024: 43.2%) which is consistent with it being a target jurisdiction of Jersey Finance who have an office in Dubai. Over the period analysed, a small increase is observed in the number PEP connections to PEPs from the Middle East, with other regions remaining relatively stable or slightly decreasing.

### 9.2 Non-Jersey PEP connections, by region



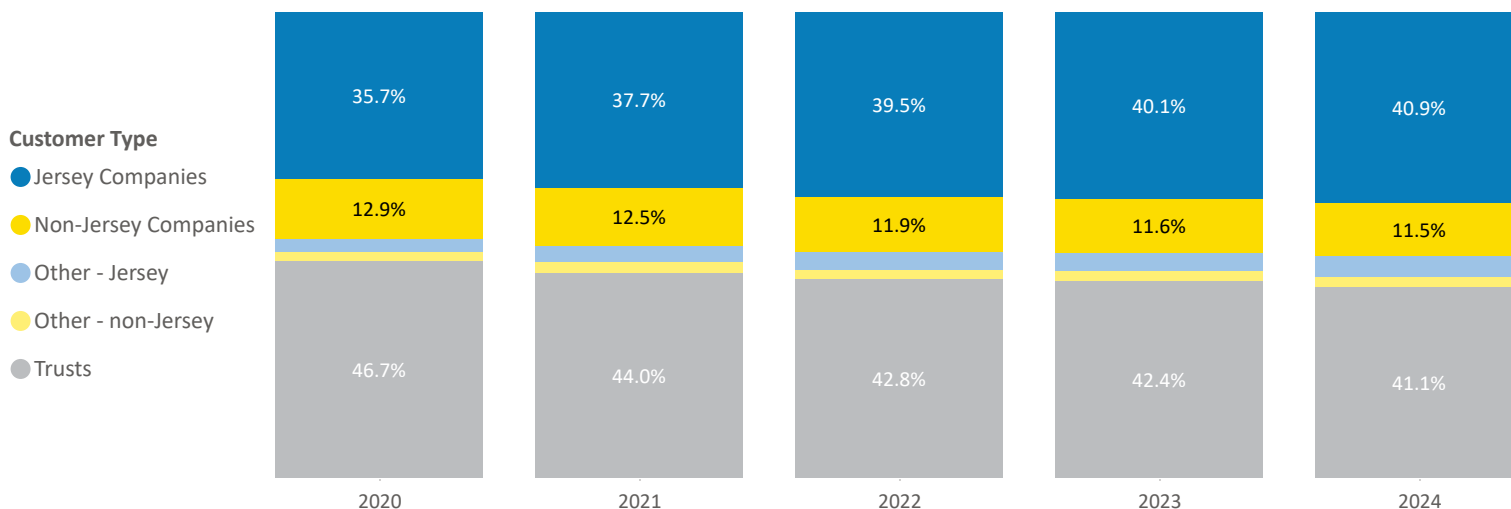
### 9.3 PEP Connections - jurisdictions listed on appendix D2 source 7



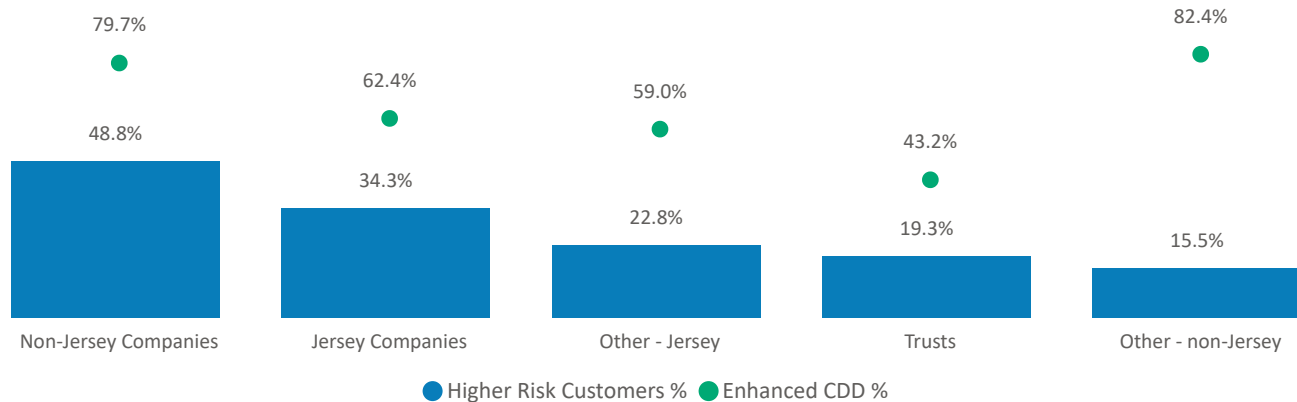
Source 7 of Appendix D2 utilises the Transparency International Corruption Perception Index and provides a list of jurisdictions which may present a higher risk of corruption. The number of connections to PEPs from these jurisdictions decreased steadily from 2020 to 2023 and remained stable in 2024.

## Customer risk

### 10.1 TCB customer types



### 10.2 Percentage of customers rated as higher risk and percentage of customers to which enhanced customer due diligence (CDD) was applied (2024)



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 29% of customers rated as higher risk in 2024, a slight decrease on 2023 (31%)

On considering which type of customer is given the highest risk rating non-Jersey and Jersey companies score highest with 48.8% and 34.3% of these customers reported as higher risk. This position is aligned with the PEP data on page 8.

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. Overall, the data demonstrates that enhanced CDD has been applied for 57% of customer relationships reflecting the conservative approach to onboarding new customers across the sector as a whole.

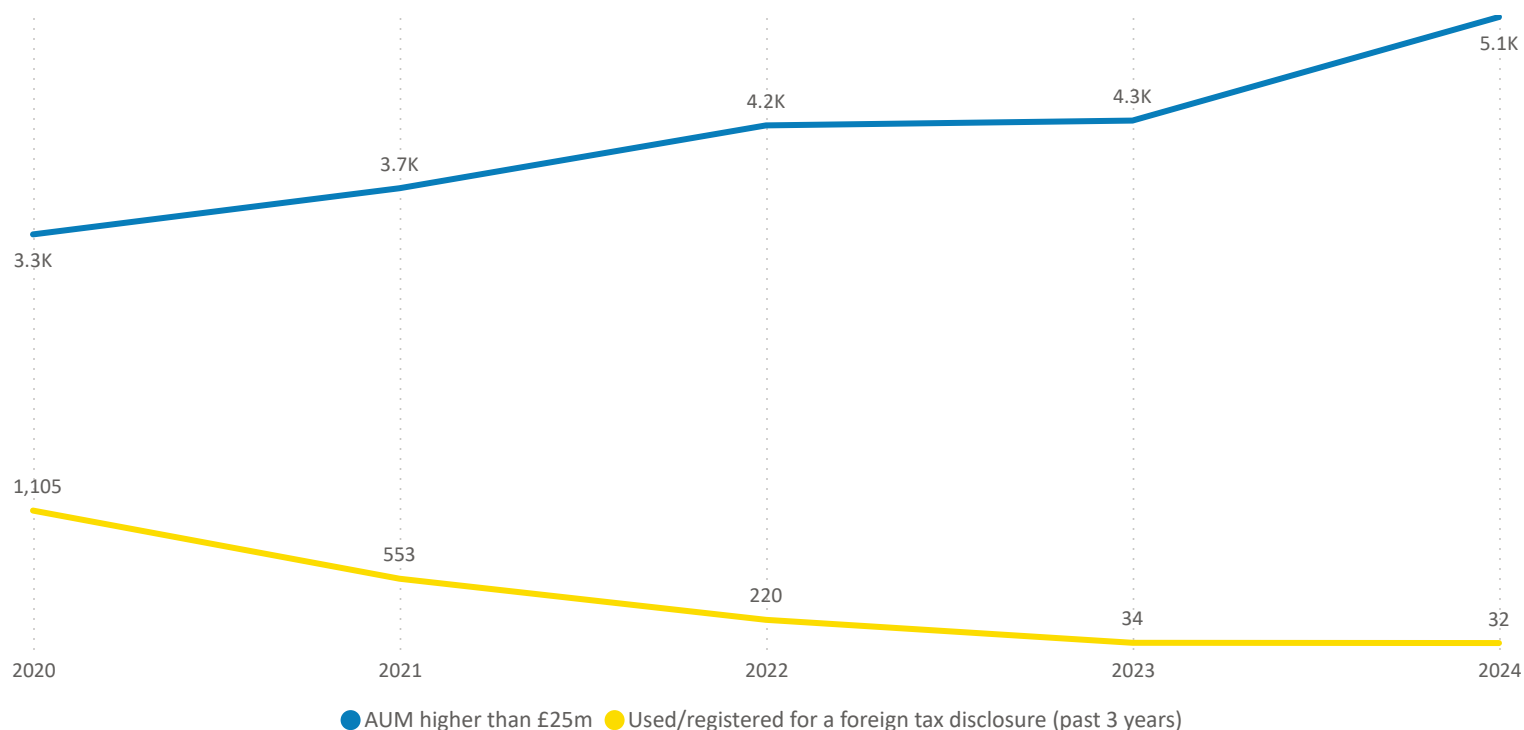
## High net worth customers and use of tax disclosure facilities

### 11.1 Customers registered for a foreign tax disclosure facility

	2020	2021	2022	2023	2024
Used/registered for a foreign tax disclosure (past 3 years)	1,105	553	220	34	32

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

	2020	2021	2022	2023	2024
AUM higher than £25m	3,342	3,716	4,225	4,264	5,103



As part of the supervisory risk data collection we collect 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. Use of foreign tax disclosure facilities remains minimal, with only 32 customers in 2024, compared to 1,105 in 2020. 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.

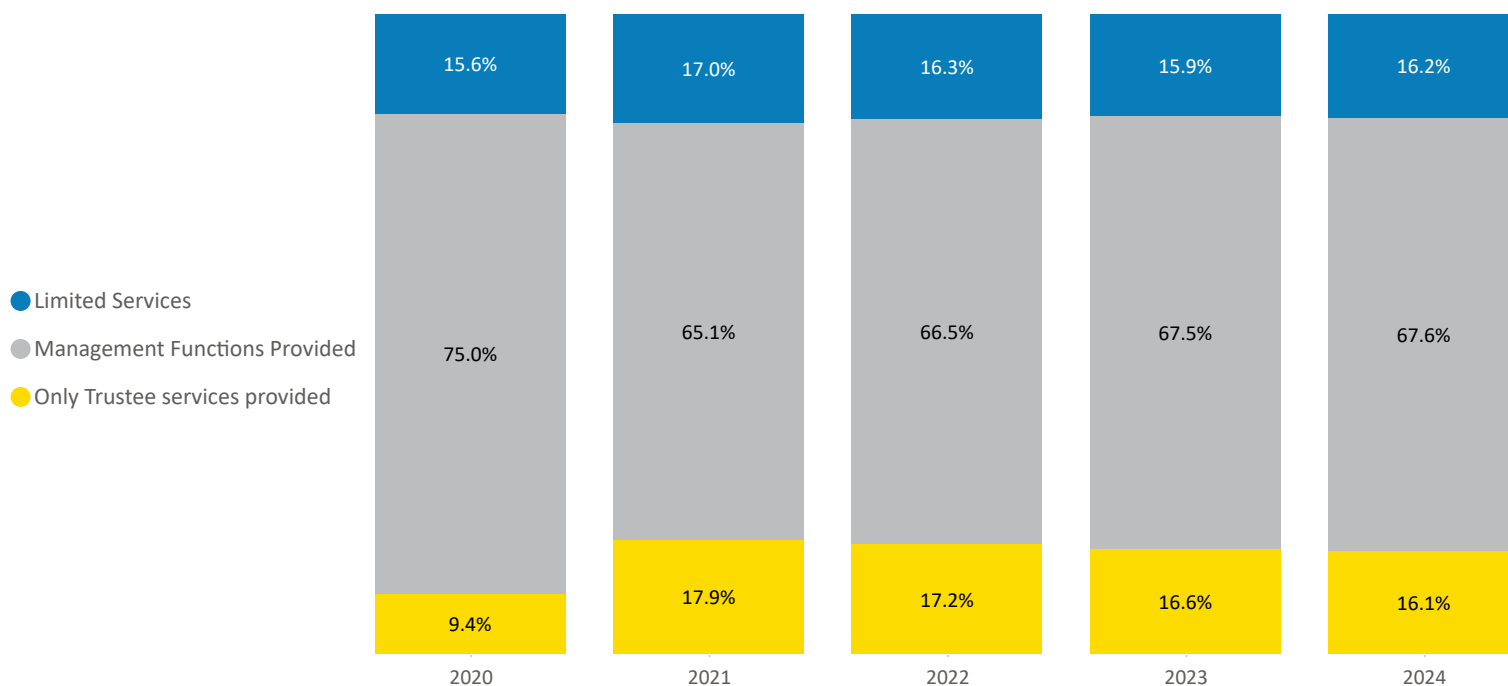
The guidance to completing the supervisory risk data has consistently set £25 million as a reporting threshold for high net worth customers. Across the period, the reporting shows that the number of these relationships has steadily increased, with a 20% increase in 2024. Jersey is known as an international finance centre with a particular expertise in wealth management, this data underscores our continued role in global wealth management.

## Services provided

### 12.1 Services provided by customer type (2024)

TCB Service	Jersey Companies	Non-Jersey Companies	Other - Jersey	Other - non-Jersey	Trusts	Total
Management Functions Provided	16,353	5,869	1,379	295	19,774	<b>43,670</b>
Limited Services	8,882	730	553	144	161	<b>10,470</b>
Only Trustee services provided					10,427	<b>10,427</b>

### 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 67.6% of the reported activity in 2024 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 16.2% of TCB customers in 2024.

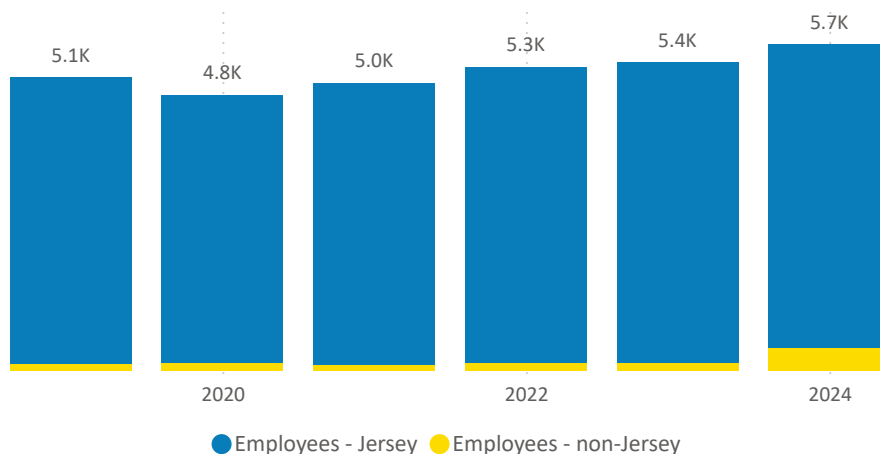


## TCB sector employees

### 13.1. Employee trend

Year	Employees - Jersey	Employees - non-Jersey	Total
2019	4,988	118	5,106
2020	4,655	147	4,802
2021	4,906	106	5,012
2022	5,152	147	5,299
2023	5,224	146	5,370
2024	5,281	400	5,681

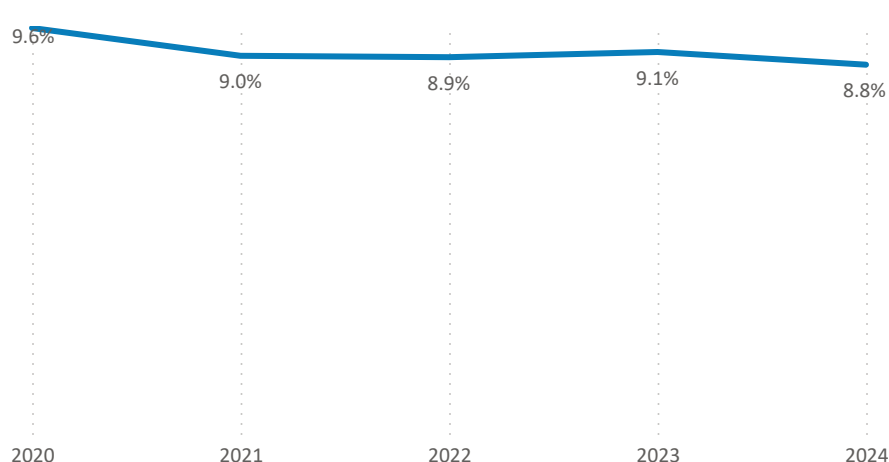
### 13.2. Jersey and non-Jersey employees



### 13.3. Compliance and risk employee trends

Year	Compliance and Risk Employees, Jersey	Compliance and Risk Employees, Non-Jersey	Compliance and Risk Vacancies
2019	450	4	38
2020	448	15	29
2021	435	15	45
2022	440	34	47
2023	453	34	27
2024	467	31	27

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

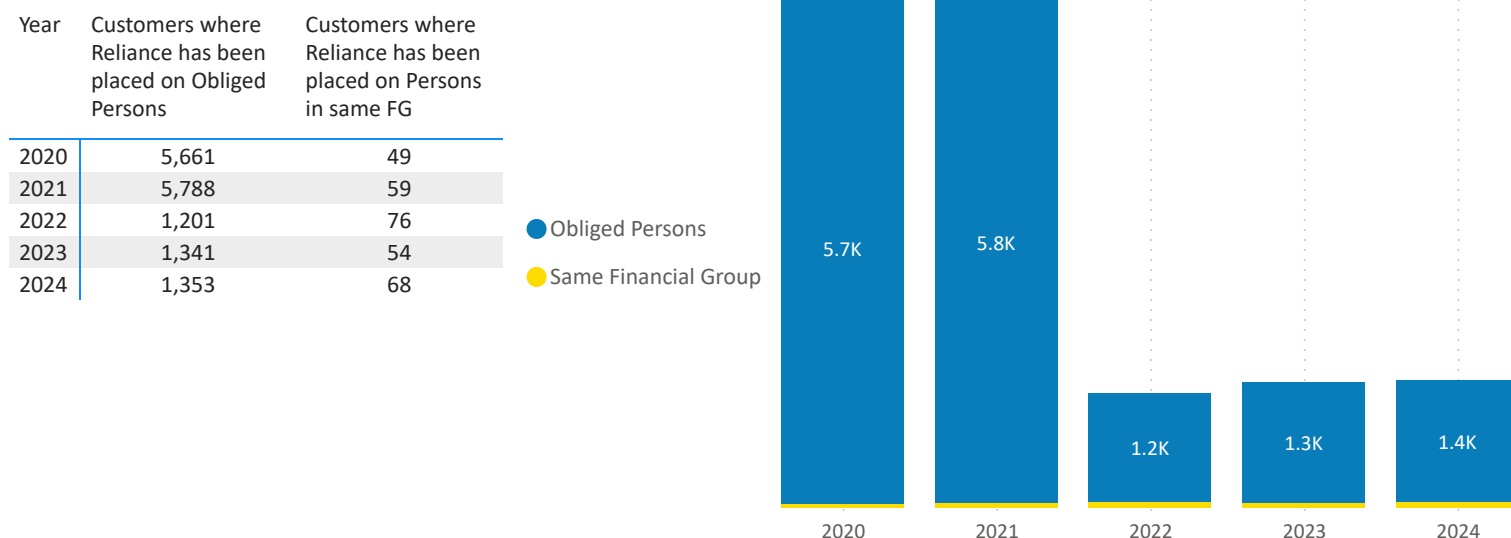


In 2024, the sector employed 5,681 individuals, including 422 based outside Jersey, reflecting a notable rise in non-Jersey staffing. Compliance and risk roles account for 10.5% of total employees, with 617 positions, indicating sustained investment in governance.

On average, over the period between 2020 and 2024, 10% of TCB employees work in a compliance or risk role (high of 10.6% in 2024 and a low of 9.6% in 2022). In the same period there is a reported increase in the number of TCB compliance/risk employees based outside of Jersey (2020: 3%, 2024 8%). Compliance and risk vacancies continued to fall in 2024 with vacancies falling from 8% of all compliance and risk roles in 2022 to 4% in 2024.

## 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



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

	2020	2021	2022	2023	2024
Article 17	348	663	304	315	276
Article 18	2,029	2,051	3,656	3,724	4,129

**Reliance (Article 16 of the MLO):** Despite a slight increase the use of reliance remains limited, with 1,353 cases involving obliged persons and 68 involving same-group reliance in 2024.

**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 2024 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):** Whilst the use of the Article 18 exemptions continues to grow it is important to note that there are five specific circumstances where the exemption can be utilised, of which the two most widely used by TCBs are the lower risk scenarios where the relationship is with a customer that is a:

- (i) public authority or company listed on an IOSCO-compliant market or regulated market or
- (ii) 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 CDD, 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

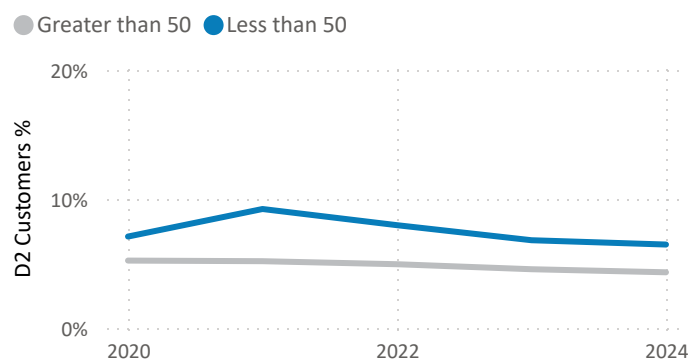
	2020	2021	2022	2023	2024
1. Sole Trader	8	9	7	8	8
2. Fewer than 50 Employees	62	63	67	64	69
3. Greater than 50 Employees	40	40	40	40	40

### Share of total customers

	2020	2021	2022	2023	2024
1. Sole Trader	3%	3%	2%	2%	2%
2. Fewer than 50 Employees	25%	25%	27%	25%	26%
3. Greater than 50 Employees	72%	73%	72%	73%	73%

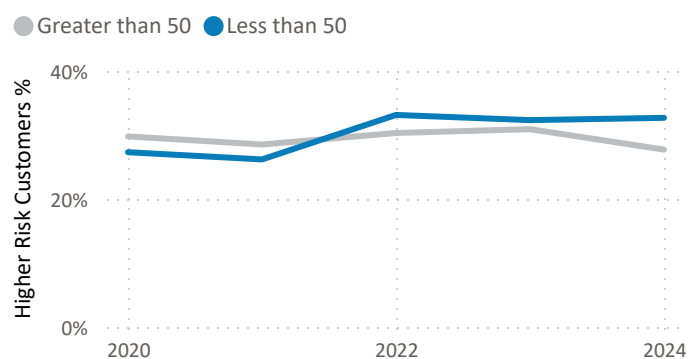
### 15.1 Key risk indicators - all TCBs

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2020	5.7%	2.0%	28.4%
2021	6.0%	2.4%	27.3%
2022	5.7%	2.2%	30.9%
2023	5.1%	1.6%	31.2%
2024	4.8%	1.5%	28.9%



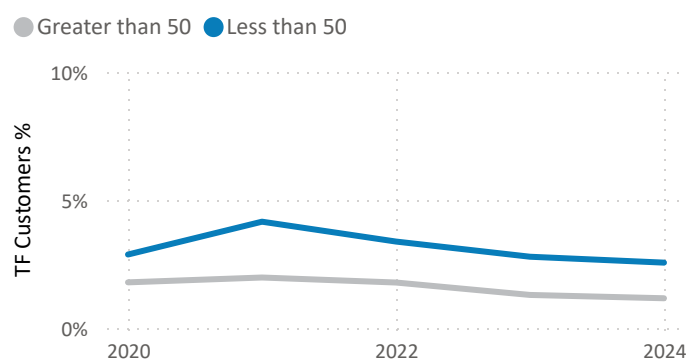
### 15.2 Key risk indicators - TCBs with greater than 50 employees

Year	Customers from Higher Risk Jurisdictions (D2)	Customers from Higher Risk Jurisdictions (GoJ TF)	Higher Risk Customers %
2020	5.2%	1.8%	29.8%
2021	5.2%	2.0%	28.5%
2022	4.9%	1.8%	30.3%
2023	4.6%	1.3%	30.9%
2024	4.3%	1.2%	27.7%



### 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 %
2020	7.1%	2.9%	27.3%
2021	9.2%	4.2%	26.2%
2022	8.0%	3.4%	33.1%
2023	6.8%	2.8%	32.3%
2024	6.5%	2.6%	32.7%

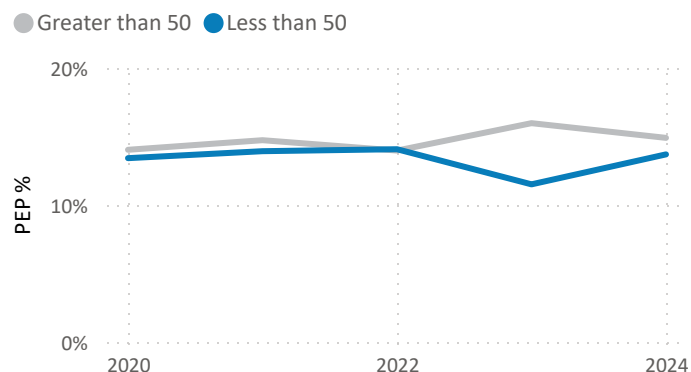




## Key risk indicators

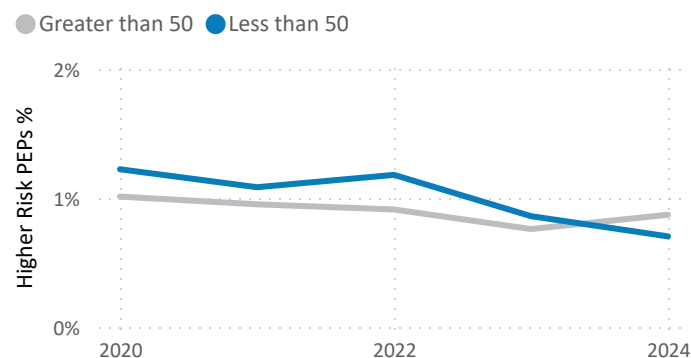
### 16.1 Key risk indicators - all TCBs

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2020	13.6%	1.0%	53%	8.8%
2021	14.2%	1.0%	54%	8.7%
2022	13.9%	1.0%	58%	1.8%
2023	14.7%	0.8%	60%	2.0%
2024	14.5%	0.8%	57%	2.1%



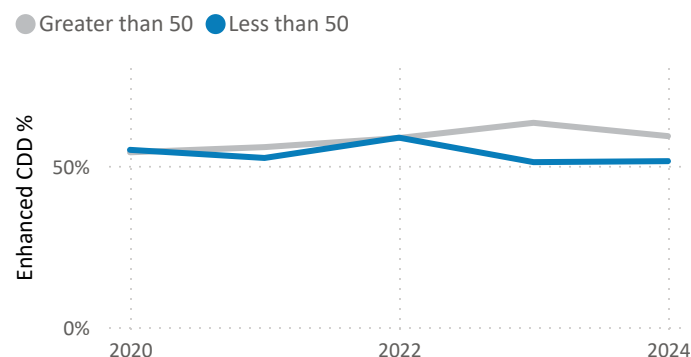
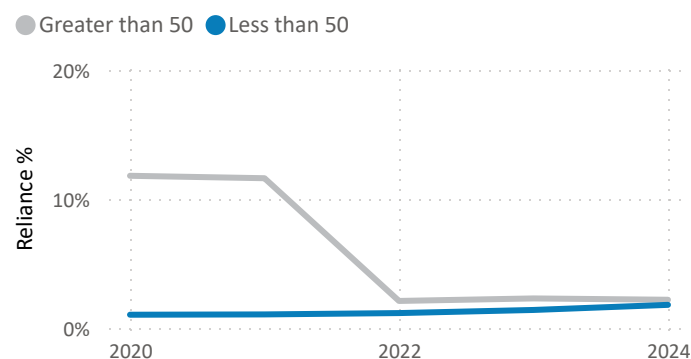
### 16.2 Key risk indicators - TCBs with greater than 50 employees

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2020	14.0%	1.0%	54%	11.8%
2021	14.7%	1.0%	56%	11.6%
2022	14.0%	0.9%	59%	2.1%
2023	16.0%	0.8%	63%	2.3%
2024	14.9%	0.9%	59%	2.2%



### 16.3 Key risk indicators - TCBs with fewer than 50 employees

Year	PEP %	Higher Risk PEPs %	Enhanced CDD %	Reliance %
2020	13.4%	1.2%	55%	1.0%
2021	13.9%	1.1%	52%	1.1%
2022	14.1%	1.2%	59%	1.2%
2023	11.5%	0.9%	51%	1.4%
2024	13.7%	0.7%	51%	1.8%







## References

### Supervisory risk data guidance

#### Section I (Footprint) Data

<https://www.jerseyfsc.org/media/8044/section-i-global-footprint-guidance-2024.pdf>

#### Section II (TCB) Data

<https://www.jerseyfsc.org/media/8012/section-ii-tcb-2024.pdf>

### 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 (as at Oct-25). Values are displayed as a % of the total across all jurisdictions.
6.1	TCB data	Sum of question UA1, for jurisdictions listed on the FATF grey-list or on three or more sources in Appendix D2 (as at the reporting date). Values are displayed as a % of the total across all jurisdictions.
7.1	TCB data	Sum of question UA1, for jurisdictions listed in GoJ list. Values are displayed as a % of the total across all jurisdictions.
8.1	TCB data	Sum of questions TA15(i) - TA15(v)
8.2	TCB data	Sum of questions TA15(i) - TA15(v) as a % of TA1(c)(i) - TA1(c)(v)
8.3	TCB data	Sum of question A24
9.1, 9.2	Section I (Footprint) Data	Sum of questions A23(a) and A23(b), jurisdictions grouped 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).

**Page 10 - 14**

Reference ▲	Source	Calculation
10.1	TCB data	TA1(c)(i) - TA1(c)(v), displayed as a percentage of the total customers.
10.2	TCB data	Enhanced CDD % - TA13(i) - TA13(v) as a % of TA1(c)(i) - TA1(c)(v)
10.2	TCB data	Higher Risk % - TA14(i) - TA14(v) as a % of TA1(c)(i) - TA1(c)(v)
11.1	TCB data	Customers Registered for a Foreign Tax Disclosure Facility - sum of TA24(a)(i) - TA24(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).