## **Financial Crime Division**

## Financial Crime Risk Return

**Template Return** 

Return period: 1 July 2020 to 30 June 2021 onwards

Note: This template document displays the entire suite of questions within the Return despite a number of questions being conditional on responses to preceding questions. As such, not all of the following questions will be visible when a live version of the form is being completed.





Home

## 151. Financial Crime Risk Return

The progress bar has been replaced with a Red Amber Green status indicator. The indicator shows whether you can Save or Submit the form based on the minimum criteria being met for each question on the tab.

- $\bullet\,$  A Red status means that you cannot Save or Submit the form.
- An Amber status means that you can Save the form but not Submit it.
- A Green status means that you can Save or Submit the form.

This form was created on Thursday, 23 September 2021 at 15:11							
Delete f	form Secure Messa	ges					
Start	Reporting Suspicion	Governance & Controls	Relationships	Geographical	Declaration		
Intro	duction						
The Commission uses the Financial Crime Risk Return ("FCRR" or "the Return") as a means of gathering important information and statistical data which is used for supervisory purposes to assist the Commission in forming a view of the financial crime risks within individual firms, within a sector, and within the financial services industry as a whole. Data may also be shared on an aggregated basis with our Bailiwick authorities for purposes such as assessing financial crime risks to the Bailiwick.							
end of t	_		-			data provided should be given as at t nulation of occurrences within the	.he
All licensed and registered firms and individuals, including administered and managed entities, are required to submit one FCRR covering the entirety of those business activities which are subject to the requirements of the Criminal Justice (Proceeds of Crime) (Bailiwick of Guernsey) Law, 1999 as amended and the Handbook on Countering Financial Crime and Terrorist Financing.							
For further information on completing the FCRR please refer to the guidance document which can be found here. All terms used within the FCRR are as defined in the Handbook and the guidance. Please complete all sections of the FCRR fully. For questions which do not apply, or where the Firm has no business in that area, please enter '0'.							
If you encounter any difficulty in completing the FCRR, or have any questions about the information to be provided, please contact the Commission's Helpdesk: support@gfsc.gg.							
Firm Name							
			~				
Data co	llection for period startir	ng					
				<b>m</b>			
Data co	llection for period endin	g					

Start	eporting Suspicion	Governance & Controls	Relationships	Geographical	Declaration			
All questions	s are mandatory unle	ess otherwise indicated						
Report	ing Suspicio	on						
This section	concerns informatio	n regarding the reporting of	suspicion.					
	In addition to the total number of disclosures made to the FIS, the FCRR also requires a breakdown of these disclosures in relation to each of the given categories. For the avoidance of doubt, each disclosure can cover one or more of the categories as required.							
	Where a disclosure does not fit within the categories provided, please add it to the 'Other Predicate Crimes' box and provide a very short description in the 'Details of the crimes and/or adverse issues for "Other Predicate Crimes" box.							
					urther information to be provided where this is considered ke in reports in respect of a given category and the reason			
Please do no	ot provide any inform	nation which identifies unde	rlying parties subj	ect to disclosures	made.			
Disclos	ures							
Number of i	nternal disclosures n	nade to the MLRO or Nomin	ated Officer durin	a the reporting pe	eriod			
				3 1 31				
Number of e	external disclosures r	made to the FIS by the MLRG	O or Nominated O	fficer during the re	eporting period (i)			
Number of	Disclosures to the	FIS by Nature of the Disclo	sure					
Tax Evasion								
Bribery and	Corruption							
bilibery and	Сопирион							
Fraud, False	Accounting or Forge	ery						
Money Laun	derina (includina fai	lure to complete Customer I	Due Diligence, Un	usual Activity)				
				,,				
Terrorism / 1	Terrorist Financing							
Insider Tradi	ing and Market Man	ipulation						
Cybercrime								
Drug Traffick	king							
Proliferation	Financing							
Environment	tal Crime							

Other Predicate Crimes
Details of the crimes and/ or adverse issues for "Other Predicate Crimes" (i)
Number of external disclosures resulting from attempted transactions or declined business opportunities
Number of external disclosures where the customer and/ or beneficial owner(s) is a:
Foreign PEP
Domestic PEP
International Organisation PEP
Does the Firm have any business relationships (as at the reporting period end) that are subject to "no consent" from the FIS?
○ Yes ○ No
Details (i)
Number of requests for information received from the FIS made under Regulation 2A and 2 (11A) of the Disclosure (Bailiwick of Guernsey), Regulations,
2007
Number of (tax) Exchange of Information on Requests (EOIRs) received by the Firm from the Revenue Service under Tax Information Exchange Agreements (TIEAs) during the reporting period
Number of business relationships where the Firm became aware during the reporting period that the customer and/or one or more beneficial owner(s)
registered for or used a tax disclosure facility (i.e. tax amnesty), broken down by jurisdiction of the tax disclosure facility.
Jurisdiction
Jurisdiction No. of Business Relationships Delete
, x
× ×
Total
Add another jurisdiction
Reporting Suspicion - Further Detail (i)

Start	Reporting Suspicion	Governance & Controls	Relationships	Geographical	Declaration			
All questions are mandatory unless otherwise indicated  Governance & Controls  This section requests information on the governance arrangements of the Firm, including details of the AML/CFT policies, procedures and controls, together with details of any outsourced functions.								
Is the Fi  Yes  Location  Where t	Governance/Structure  Is the Firm part of a group of companies?  Yes No  Location of the ultimate group parent entity  Where there is a parent entity of the Firm, what type of entity is the parent?							
○ Ban	k O Non-bank Financi	ial Services O Private equit	ty/fund ○ Lega	ll/Accountancy firm	n Other O No Parent entity			
	of branches or subsidia	ries of the Firm broken down	by jurisdiction of Number of Se	•	Number of Branches	Delete		
		•				×		
+ Add	another jurisdiction							
Have there been any significant changes in the Firm's business activities during the reporting period which would impact on:  • the types of products and services offered;  • the types of customers it targets; or  • the delivery channels through which products and services are offered to customers?  O Yes O No  Details 1  Is the Firm an administered/managed licensee? (i.e. is this Return being completed for an administered/managed licensee?)								
○ Yes ○ No  Total FTE within the Firm as at the end of the Reporting Period								
FTE working specifically in AML/CFT compliance roles within the Firm (excluding outsourced and group FTE) as at the end of the Reporting Period  Governance/Structure – Further Detail (i)								
Policies, Procedures and Controls  Has the Firm's money laundering business risk assessment been reviewed by the board during the reporting period?  O Yes O No								
Please p	provide the date of the la	st review.		40				
Please r	provide further detail (i)	)						

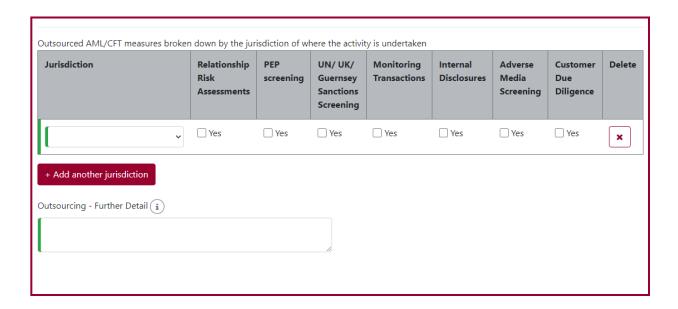
Has the Firm's terrorist financing business risk assessment been reviewed by the board during the reporting period?
○ Yes ○ No
Please provide the date of the last review.
Please provide further detail (i)
During the reporting period, has the Board considered the appropriateness and effectiveness of its AML/CFT compliance arrangements?
Yes    No
Please provide the date this last occurred
Thease provide the date this last occurred
Please provide further detail (i)
Has the board established a policy to review its compliance with Schedule 3 and the Handbook?
O Yes O No
Please provide further details regarding why a policy has not been established (i)
Does the board receive results of the tests carried out as part of the compliance monitoring programme?  O Yes O No
On what frequency does the board consider the results of the Firm's compliance monitoring programme?
<ul> <li>○ Weekly</li> <li>○ Monthly</li> <li>○ Quarterly</li> <li>○ Annually</li> <li>○ Biannually</li> <li>○ Never</li> <li>○ Other</li> </ul>
Please provide further detail regarding the board's consideration of the results of the Firm's compliance monitoring programme (i)
Does the Firm maintain an independent audit function (whether internal or external) to test its AML and CFT policies, procedures and controls?
O Yes O No O Yes O No
When was the last review of part or all of the firm's AML and CFT policies, procedures and controls?
In which year did the board last consider whether it would be appropriate to maintain an independent audit function to test its AML and CFT policies,
procedures and controls?
Has the Firm commissioned an external services provider to test its AML and CFT policies, procedures and controls within the last three years?
○ Yes ○ No
When was the last review of part or all of the Firm's AML and CFT policies, procedures and controls?

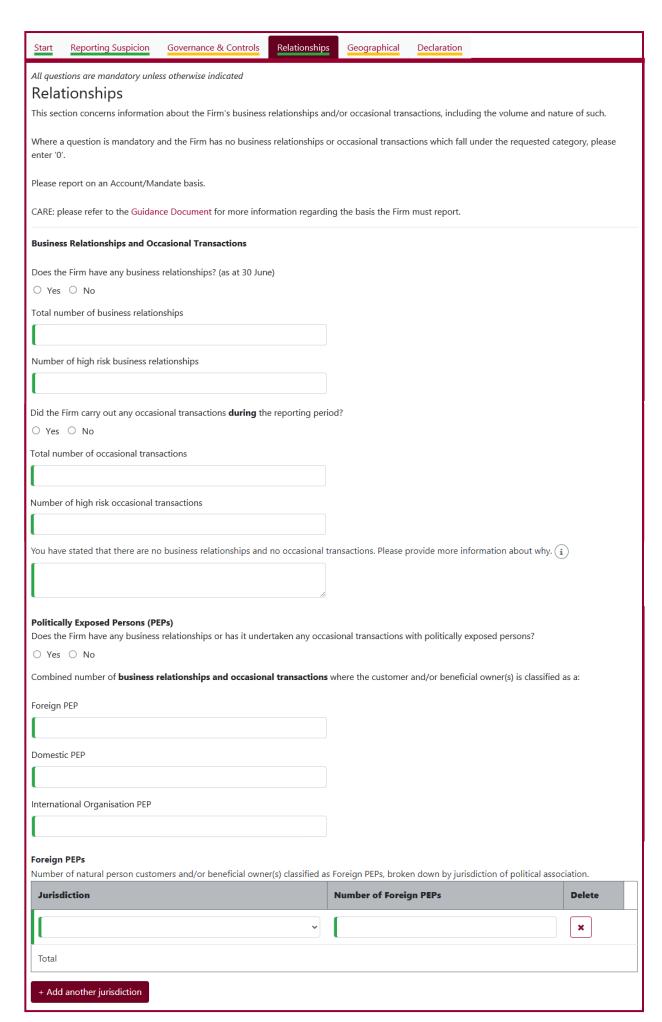
Wha	at is the Firm's timing for monitoring of transactions within a business relationship or occasional transaction? $(i)$
	Real-Time
	Post-Event
	Both
	Not monitored outside of ML/FT risk reviews
	N/A – the firm does not undertake monetary transactions
POII	cies, Procedures and Controls - Further Detail (i)
	trols for identifying PEP connections, adverse media and sanctioned parties s the Firm establish business relationships?
	Yes O No
Frec	uency of Screening
	juency of screening of Business Relationships to identify whether the customer or beneficial owner(s) has any <b>political connections</b> which the Firm
	uld consider if it would classify them as a <b>PEP</b> the Risk
_	Prior to/as part of take-on only
	During periodic review
	Trigger
_	Daily
	Weekly
	Fortnightly
	Monthly
	Quarterly
	Annually
	Never
	oldard Risk
	Prior to/as part of take-on only
	During periodic review  Trigger
	Daily
	Weekly
	Fortnightly
	Monthly
	Quarterly
	Annually
	Never
	Risk
0	N/A – relationships are not rated low risk
	Prior to/as part of take-on only
0	During periodic review
0	Trigger
	Daily
0	Weekly
0	Fortnightly
	Monthly
	Quarterly
0	Annually
0	Never

Frequency of screening of Business Relationships to identify whether there is adverse media about key principals
High Risk
O Prior to/as part of take-on only
O During periodic review
○ Trigger
O Daily
O Weekly
O Fortnightly
O Monthly
○ Quarterly
O Annually
O Never
Standard Risk
O Prior to/as part of take-on only
O During periodic review
○ Trigger
O Daily
O Weekly
O Fortnightly
O Monthly
O Quarterly
O Annually
O Never
Low Risk
O N/A – relationships are not rated low risk
O Prior to/as part of take-on only
O During periodic review
O Trigger
O Daily
O Weekly
O Fortnightly
O Monthly
O Quarterly
O Annually
O Never
Frequency of screening of Business Relationships to identify UN/UK/Guernsey sanctioned parties
O Prior to/as part of take-on only
O Trigger
O Daily
O Weekly
O Fortnightly
O Monthly
O Quarterly
O Annually
O Never

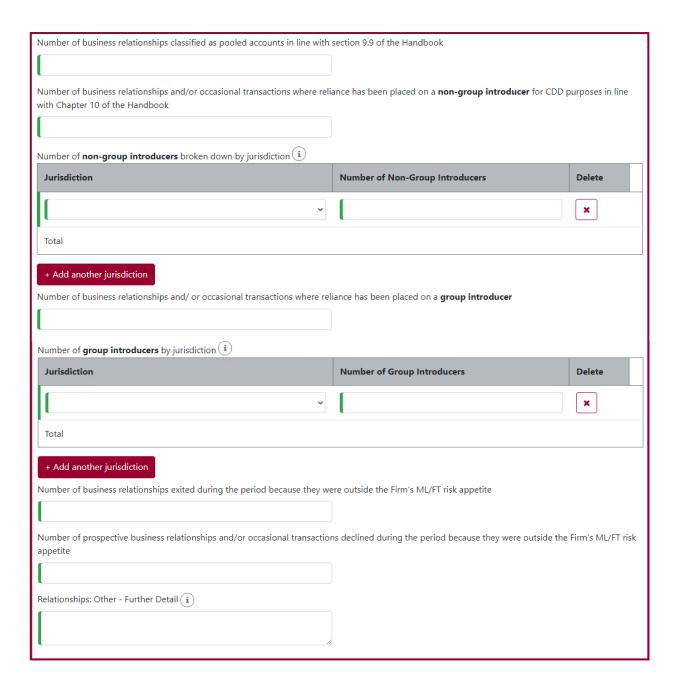
If the Firm undertakes Occasional Transactions, at what points are the key p • whether the customer or beneficial owner(s) has any political connecti • whether there is adverse media about key principals; and • UN/UK/Guernsey sanctioned parties	·
Frequency of screening of transactions to identify <b>UN/UK/Guernsey sancti</b> Real-Time	oned parties
O Post-Event O Both	
O Never	
O N/A – the firm does not undertake monetary transactions	
Does the firm screen recipients of third party payments against sanctions lis	ts?
○ Yes ○ No ○ N/A – the firm does not undertake monetary transact	ions
Screening Systems  Does the Firm use automated IT systems to identify whether the customer consider if it would classify them as a <b>PEP</b> ?	or beneficial owner(s) has any <b>political connections</b> which the firm should
○ Yes ○ No	
Please provide further detail regarding the Firm's processes to identity such	political connections (i)
Does the firm use automated IT systems to identify whether there is <b>advers</b>	e media about key principals?
○ Yes ○ No	
Please provide further detail regarding the Firm's processes to identify adve	rse media (i)
Does the Firm use automated IT systems to identify <b>UN/UK/Guernsey sand</b> O Yes O No	ctioned parties?
Please provide further detail regarding the Firm's processes to identify UN/I	JK/Guernsey sanctioned parties (i)
Screening - Further Detail (i)	
Frequency of ML/FT Risk Reviews Please provide the frequency of ML/FT risk reviews undertaken for business number that were scheduled to be undertaken and the number that were co	
High Risk Frequency of Review	
○ 12 months or less ○ 13 - 24 months ○ more than 24 months ○	Trigger only
Number of periodic ML/FT High Risk reviews scheduled during reporting pe	riod
Number of ML/FT High Risk reviews completed during the reporting period	

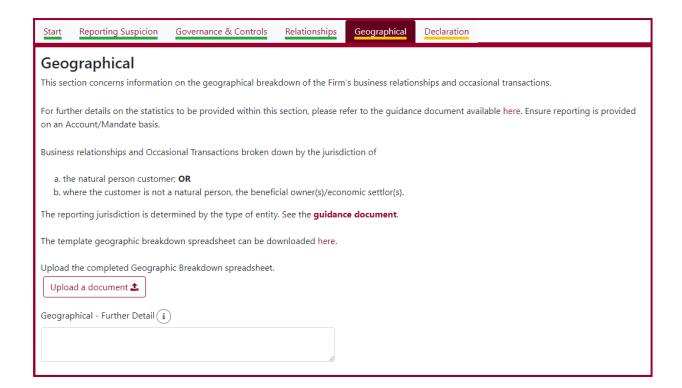
Standard Risk Frequency of Review
○ 12 months or less ○ 13 - 24 months ○ more than 24 months ○ Trigger only
Number of periodic ML/FT Standard Risk reviews scheduled during reporting period
Number of ML/FT Standard Risk reviews completed during the reporting period
. , , , , , , , , , , , , , , , , , , ,
Low Risk Frequency of Review
O N/A – relationships are not rated low risk O 12 months or less O 13 - 24 months O more than 24 month O Trigger only
Number of periodic ML/FT Low Risk reviews scheduled during reporting period
Number of ML/FT Low Risk reviews completed during the reporting period
Administration of the state of
High Risk, Standard Risk & Low Risk
Does the Firm also undertake trigger based ML/FT risk reviews in addition to the above regular frequencies of review?
○ Yes ○ No
ML/FT Risk Reviews - Further Detail (i)
Outsourcing
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?
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Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes O No
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes O No  Relationship Risk Assessments
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes O No  Relationship Risk Assessments  Not Outsourced O External Party O Intra-Group O Under Administration Agreement
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes O No  Relationship Risk Assessments  Not Outsourced O External Party O Intra-Group O Under Administration Agreement  PEP screening
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes No  Relationship Risk Assessments  Not Outsourced External Party Intra-Group Under Administration Agreement  PEP screening  Not Outsourced External Party Intra-Group Under Administration Agreement
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes No  Relationship Risk Assessments  Not Outsourced External Party Intra-Group Under Administration Agreement  PEP screening  Not Outsourced External Party Intra-Group Under Administration Agreement  UN/UK/Guernsey Sanctions Screening  Not Outsourced External Party Intra-Group Under Administration Agreement  Monitoring Transactions
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes No  Relationship Risk Assessments  Not Outsourced External Party Intra-Group Under Administration Agreement  PEP screening  Not Outsourced External Party Intra-Group Under Administration Agreement  UN/UK/Guernsey Sanctions Screening  Not Outsourced External Party Intra-Group Under Administration Agreement  UN/UK/Guernsey Sanctions Screening  Not Outsourced External Party Intra-Group Under Administration Agreement
Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes No Relationship Risk Assessments  Not Outsourced External Party Intra-Group Under Administration Agreement  PEP screening  Not Outsourced External Party Intra-Group Under Administration Agreement  UN/UK/Guernsey Sanctions Screening  Not Outsourced External Party Intra-Group Under Administration Agreement  Monitoring Transactions  Not Outsourced External Party Intra-Group Under Administration Agreement  Monitoring Transactions  Not Outsourced External Party Intra-Group Under Administration Agreement  Internal Disclosures
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Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes No  Relationship Risk Assessments  Not Outsourced External Party Intra-Group Under Administration Agreement  PEP screening  Not Outsourced External Party Intra-Group Under Administration Agreement  UN/UK/Guernsey Sanctions Screening  Not Outsourced External Party Intra-Group Under Administration Agreement  Monitoring Transactions  Not Outsourced External Party Intra-Group Under Administration Agreement  Internal Disclosures  Not Outsourced External Party Intra-Group Under Administration Agreement  Adverse Media Screening  Not Outsourced External Party Intra-Group Under Administration Agreement  Adverse Media Screening  Not Outsourced External Party Intra-Group Under Administration Agreement
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Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes No Relationship Risk Assessments Not Outsourced External Party Intra-Group Under Administration Agreement  PEP screening Not Outsourced External Party Intra-Group Under Administration Agreement  UN/UK/Guernsey Sanctions Screening Not Outsourced External Party Intra-Group Under Administration Agreement  Monitoring Transactions Not Outsourced External Party Intra-Group Under Administration Agreement  Internal Disclosures Not Outsourced External Party Intra-Group Under Administration Agreement  Adverse Media Screening Not Outsourced External Party Intra-Group Under Administration Agreement  Adverse Media Screening Not Outsourced External Party Intra-Group Under Administration Agreement  Customer Due Diligence Not Outsourced External Party Intra-Group Under Administration Agreement
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Are any of the Firm's measures or controls for compliance with the Relevant Enactments (as defined in the Handbook) outsourced?  Yes No Relationship Risk Assessments  Intra-Group Intra-Group Under Administration Agreement  PEP screening  Not Outsourced External Party Intra-Group Under Administration Agreement  UN/UK/Guernsey Sanctions Screening  Not Outsourced External Party Intra-Group Under Administration Agreement  Under Administration Agreement  Monitoring Transactions  Not Outsourced External Party Intra-Group Under Administration Agreement  Internal Disclosures  Not Outsourced External Party Intra-Group Under Administration Agreement  Adverse Media Screening  Not Outsourced External Party Intra-Group Under Administration Agreement  Customer Due Diligence  Not Outsourced External Party Intra-Group Under Administration Agreement  Customer Due External Party Intra-Group Under Administration Agreement





Domestic PEPs		
Number of business relationships and occasional transactions assessed as h	ign risk	
Number of business relationships and occasional transactions assessed as n	on-high risk	
International Organisation PEPs		
Number of business relationships and occasional transactions assessed as h	igh risk	
Number of business relationships and occasional transactions assessed as n	on-high risk	
	-	
Please provide the names of the International Organisations that the above the number connected to each.	business relationships/occasional transactions are connected to, together	with
(i)		
Declassification of PEPs		
During the reporting period, in line with section 8.5.6 of the Handbook, has former PEPs, whether an existing business relationship, during the establish		_
○ Yes ○ No		
Foreign PEPs Declassified		
Domestic PEPs Declassified		
International Organisation PEPs Declassified		
J		
Number of business relationships which have had their risk rating lowered a	is a result of declassifying PEPs connected to the relationship	
Number of business relationships where the ML/FT risk rating has been low business relationships involving a PEP who is not the beneficial owner and v		rding
PEPs - Further Detail (i)		
rers - rutulei Detail (1)		
Other		
Number of business relationships and/ or occasional transactions that have		as a
result of a connection with a sanctioned individual or entity, as at the report	ing period end	
Number of business relationships where an intermediary is treated as the cu	ustomer in line with section 9.8 of the Handbook	
Number of intermediaries which are considered the customer, broken down	by jurisdiction. (i)	
Jurisdiction	Number of Intermediaries Delete	
	x	
Total		
+ Add another jurisdiction		





Start	Reporting Suspicion	Governance & Controls	Relationships	Geographical	<u>Declaration</u>			
	All questions are mandatory unless otherwise indicated							
Dec	laration							
Where the Firm considers it necessary to provide extra information/context to the responses provided within this form, please upload any supporting information below:								
Uplo	ad a document 🚣							
	Please confirm you have read the guidance document before filling out this return. ☑ I confirm I have read the guidance document							
This for	This form is now ready for submission.							
By selecting 'I agree' and clicking 'Submit' below you are confirming that the information supplied is complete and correct to the best of your knowledge and belief at the time of submission and that there are no other facts of which the Guernsey Financial Services Commission should be aware.								
By Sub	mitting you also undertak	e to inform the Commission	n, without delay, o	of any material cha	nges to the information supplied on this form.			
🗹 I agı	ree to the above							
Please	provide your name (i)							
•								