

Sanctions RA Methodology

Sanctions Risk Assessment — How sanctions exposure is scoped, scored and refreshed.

Purpose

Quantify the firm's exposure to sanctioned persons, entities and jurisdictions, and demonstrate that screening, list management and escalation are calibrated to that exposure.

Scope dimensions

- List coverage (UK, EU, OFAC, UN, Jersey)
- Customer & connected-party exposure
- Geographic concentration
- Counterparty & payment-corridor exposure
- Product exposure (lending, FX, virtual assets)

Frequency

Annual minimum; event-triggered on list update of strategic significance, regime change, or material new customer relationship.

JFSC anchors: Sanctions and Asset-Freezing (Jersey) Law 2019 · AML/CFT/CPF Handbook §8 (Sanctions)