

Compliance Monitoring Programme

FY2026 — JFSC Code of Practice for Trust Company Business

Tenant	Northwind Fiduciary (Jersey) [SANDBOX]
Period	Q4 2026
Generated	Reproducible from live sandbox data
Classification	DEMONSTRATION — NOT FOR EXTERNAL CIRCULATION

This artefact is generated by the RegAlign® platform from a sandbox tenant (Northwind Fiduciary [SANDBOX]) populated with synthetic data for demonstration purposes. It is structurally identical to artefacts produced for live tenants.

1. Purpose & Scope

This Compliance Monitoring Programme (CMP) sets out how Northwind Fiduciary (Jersey) Limited assures itself that its operations remain compliant with the JFSC Code of Practice for Trust Company Business (TCB), the Proceeds of Crime (Jersey) Law 1999, the Money Laundering (Jersey) Order 2008, and the Data Protection (Jersey) Law 2018.

The CMP is owned by the Compliance Officer (CO) and reviewed annually by the Board. Day-to-day operation is delegated to the Compliance Monitoring function, with second-line oversight from MLRO and Risk.

2. Methodology

Monitoring is risk-based. Test frequency and sample size are calibrated to the residual risk score recorded in the Compliance Risk Assessment (CRA) for each domain. Higher-residual domains receive more frequent, larger-sample testing.

- **Sampling:** stratified random sampling; sample size derived from population x residual band (5%, 10%, 15%).
- **Evidence:** every test produces hash-anchored evidence stored in the platform's evidence register.
- **Outcomes:** Passed / Qualified / Failed. Failed and qualified outcomes raise a Finding automatically.
- **Closure:** Findings promote to Issues; Issues close only on evidence review and CO sign-off.
- **Reporting:** monthly to ExCo, quarterly to the Board, annually to the JFSC where required by Direction.

3. Test Plan — FY2026

Twelve domains in scope. Cadence reflects current residual rating.

Domain	Residual	Cadence	Tests/yr	Sample basis
AML / CDD onboarding	Amber	Monthly	12	10% of new files
AML / Ongoing monitoring	Amber	Monthly	12	5% of active files
AML / PEP & sanctions	Red	Monthly	12	100% of PEP files
AML / SAR & internal reports	Amber	Quarterly	4	100% of internal STRs
Conduct of business	Green	Quarterly	4	10% sample
Governance & oversight	Green	Half-yr	2	Board minutes review
Outsourcing & oversight	Amber	Quarterly	4	All material outsourcers
Record-keeping	Green	Annual	1	Full population walkthrough
Training & competence	Amber	Quarterly	4	100% attestation review
Data protection	Amber	Quarterly	4	DPIA + DSAR sample
Complaints handling	Green	Quarterly	4	100% complaints
Regulatory reporting	Amber	Per filing	6	Pre-submission review

4. Sampling Methodology (extract)

For each test, the sample is drawn server-side using a deterministic PRNG seeded on test ID, so the sample can be reproduced for audit. Sample size n is the larger of:

- Population \times residual band (5/10/15%), and
- A floor of 10 items for populations ≥ 100 , or 100% otherwise.

Stratification is applied where the population is materially heterogeneous (e.g. by risk rating of client, geography, or product). Each sample item is anchored to the source record by stable ID.

5. Governance

- CO owns the CMP; reviews quarterly, refreshes annually.
- MLRO is consulted on any AML test design change.
- Board approves the CMP and any in-year material changes.
- JFSC may request the CMP and supporting evidence at any time.

6. Integrity assurance

Every CMP state change — plan creation, test execution, finding raised, issue closed — writes an entry to the tenant's hash-chained audit trail. The chain is independently verifiable via the public verify endpoint without disclosing tenant data. See accompanying *Audit Trail Extract*.