

Business Risk Assessment

FY2026 — firm-wide inherent ML/TF risk position

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

SAMPLE

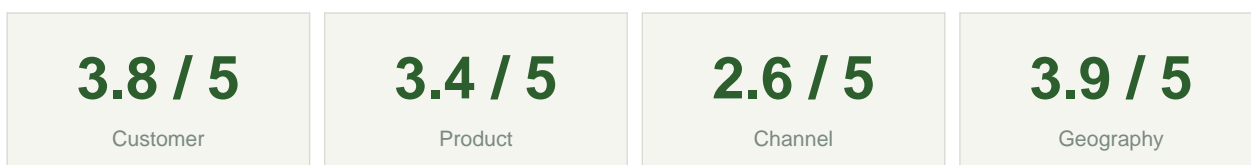
This artefact is generated by the RegAlign® platform from a sandbox tenant (Northwind Fiduciary [SANDBOX]) populated with synthetic data for demonstration purposes. It is structurally identical to artefacts produced for live tenants.

1. Methodology

The BRA assesses the firm's inherent exposure to money laundering, terrorist financing, proliferation financing and sanctions risk, before consideration of mitigating controls. It informs the CRA and drives risk-based onboarding and monitoring thresholds.

Risk categories follow JFSC Handbook §3 and FATF guidance: customer, product/service, channel, geography, transaction. Each category is scored 1–5; weighted scores aggregate to the firm-level inherent rating.

2. Aggregate position



Weighted firm-level inherent rating: **Medium-High (3.6 / 5)**. Prior-period rating (FY2025): 3.4. The shift reflects increased exposure to high-risk jurisdictions following the onboarding of two Middle-East-domiciled structures in Q1.

3. Risk register (top 10 inherent risks)

#	Risk	Cat.	Likelihood	Impact	Inherent
R-01	Layering via complex trust structures	Product	Possible	Major	High
R-02	Sanctions exposure — Russia/Belarus links	Geography	Possible	Severe	High
R-03	PEP misuse of underlying companies	Customer	Possible	Major	High
R-04	Tax-evasion as predicate offence	Customer	Likely	Major	High
R-05	Cash-equivalent assets (crypto, gold)	Product	Possible	Major	Med-Hi
R-06	Concealment of beneficial ownership	Customer	Likely	Major	High
R-07	Outsourced introducer due diligence	Channel	Possible	Moderate	Medium
R-08	Internal collusion / control override	Customer	Unlikely	Severe	Med-Hi
R-09	Source-of-funds opacity (private sale)	Product	Likely	Moderate	Med-Hi
R-10	Geographic concentration — top 5 jurisdictions	Geography	Likely	Moderate	Med-Hi

4. Use of this assessment

- Calibrates customer risk-rating thresholds in onboarding.
- Drives sample sizes in the Compliance Monitoring Programme.
- Feeds the Compliance Risk Assessment (per-domain residual scoring).
- Documented in the firm's AML/CFT Business Risk Assessment register.
- Reviewed annually by the Board; out-of-cycle on material change.