

# THE AMLATF BOARD

## Bermuda Bar : Annual Statistical Report 2021 and 2022

### REGULATED PROFESSIONAL FIRMS (LAWYERS)

#### Percentage of Firms Participating

(a) Products and services offered by firms:

	2022	2021	2020
<b>Purchase and sale of real estate</b>			
a) more than 60 transactions	21%	18%	18%
b) between 30 and 60 transactions	6%	12%	12%
c) less than 30 transactions	74%	70%	70%
<b>Real estate transaction - held by trustee</b>			
a) more than 10 transactions	12%	6%	6%
b) between 5 and 10 transactions	9%	21%	21%
c) less than 5 transactions	79%	73%	73%
<b>Managing of financial assets (money, bank accounts, securities, etc.)</b>			
a) more than 25 clients	9%	3%	3%
b) between 10 and 25 clients	6%	9%	9%
c) less than 10 clients	85%	88%	88%
<b>Organizing or managing contributions for creation, operation or management of legal entities</b>			
a) more than 100 clients	3%	0%	0%
b) between 50 and 100 clients	3%	3%	6%
c) less than 50 clients	94%	97%	94%
<b>Creation, operation and management of legal entities</b>			
a) more than 40 clients	9%	6%	6%
b) between 20 and 40 clients	3%	6%	6%
c) less than 20 clients	88%	88%	88%

(b) Client types:

<b>Are certain of your clients or beneficial owners (if more than 1 select highest risk):</b>			
a) residents of countries at high risk of ML/FT	12%	6%	6%
b) residents from other countries who are not high risk	26%	55%	55%
c) Bermuda nationals	62%	39%	39%
<b>Individuals that act on behalf of a third person including professional intermediaries)?</b>			
a) more than 10 clients	24%	9%	9%
b) between 5 and 10 clients	24%	3%	3%
c) less than 5 clients	53%	88%	88%
<b>High net worth clients</b>			
a) more than 25 clients	3%	9%	9%
b) between 5 and 25 clients	6%	15%	15%
c) less than 5 clients	91%	76%	76%
<b>Non-profit organizations</b>			
a) Foreign from high risk jurisdiction	0%	0%	0%
b) Foreign from jurisdictions that are not high risk	12%	3%	3%
c) Bermudian	88%	97%	97%

(c) Politically exposed persons:

<b>Politically exposed persons?</b>			
a) Foreign PEP	24%	24%	24%
b) Domestic PEP	24%	21%	21%
c) No	53%	55%	55%

(d) Countries of geographic areas

<b>FATF and FATF style regional bodies countries identified as having weak AML/CFT regimes</b>			
a) more than 5 transactions	9%	9%	9%
b) between 1 and 5 transactions	6%	15%	15%
c) 0 transactions	85%	76%	76%
<b>UN sanctioned countries (including for proliferation issues)</b>			
a) more than 5 transactions	2%	0%	0%
b) between 1 and 5 transactions	0%	0%	0%
c) 0 transactions	98%	100%	100%
<b>High risk money laundering countries (esp. corruption, drug trafficking, etc.)</b>			
a) more than 5 transactions	3%	6%	6%
b) between 1 and 5 transactions	3%	6%	6%
c) 0 transactions	94%	88%	88%
<b>Countries or regions at high risk of terrorism or terrorism financing</b>			
a) more than 5 transactions	0%	0%	0%
b) between 1 and 5 transactions	0%	3%	3%
c) 0 transactions	100%	97%	97%
<b>Other high risk countries or regions as determined by Bermuda or other countries</b>			
a) more than 5 transactions	0%	0%	0%
b) between 1 and 5 transactions	9%	0%	0%
c) 0 transactions	91%	100%	100%

(e) Types of transactions and delivery channels

<b>Non-face-to-face clients taken on by firm</b>			
a) more than 250 transactions	9%	3%	3%
b) between 100 and 250 transactions	12%	3%	3%
c) less than 100 transactions	79%	94%	94%
<b>Introduced clients and clients where customer due diligence is performed by others</b>			
a) more than 5 transactions	9%	6%	6%
b) between 1 and 5 transactions	9%	0%	0%
c) 0 transactions	82%	94%	94%
<b>Business conducted over the internet (e-services)</b>			
a) more than 5 transactions	15%	9%	9%
b) between 1 and 5 transactions	6%	0%	0%
c) 0 transactions	79%	91%	91%