

Jersey AML registration– update on non-executive directors and step-by-step guidance on how to register

Briefing Summary: Earlier this year, we published a summary of the recent changes to the scope of Jersey's proceeds of crime and anti-money laundering (AML/CFT) legislation which were intended to align Jersey's regime more closely with Financial Action Task Force Recommendations (see [Recent changes to Jersey's AML/CFT regime – a user-friendly summary and FAQ | Carey Olsen](#)).

Service Area: Corporate, Investment Funds, Regulatory, Trusts and Private Wealth

Location: Jersey

Content Authors: Robert Milner, Andrea Steel, Evija Vanaga

Created Date: 25 September 2023

Overview

One of the key changes made has been to remove exemptions for AML registration for people carrying on the business of being a non-executive director.

Over the course of the summer, there has been considerable consultation between industry, government and the Jersey Financial Services Commission (JFSC) regarding the scope of the changes and the JFSC has published FAQs and guidance to assist entities and individuals to navigate the new requirements. The JFSC also helpfully extended the registration deadline for certain in-scope entities and individuals (including directors and family offices) to 30 September. The guidance issued by the JFSC on 18 September regarding the interpretation of "*in or from within Jersey*" has been particularly welcomed by industry.

Non-Resident Directors

We are pleased to confirm that, in accordance with this most recent guidance, most non-resident directors (NRDs) will be out of scope for Schedule 2 registration. The mere provision of services to customers in Jersey or occasional visits to Jersey to attend board meetings is not sufficient to bring NRDs into scope. Instead, NRDs will only be required to register if they have some degree of permanence in Jersey (i.e. an office from which they work when in Jersey which is taken in their own name for the purpose of their business activities).

Key Contacts



Robert Milner

PARTNER, JERSEY

+44 (0)1534 822336



Andrea Steel

COUNSEL, LONDON

+44 (0)7502 298 489

[EMAIL ROBERT](#)

[EMAIL ANDREA](#)



Evija Vanaga

ASSOCIATE, JERSEY

+44 (0)1534 822352

[EMAIL EVIJA](#)

Resident Non-Executive Directors

Jersey resident non-executive directors, on the other hand, are likely to fall within the scope of Schedule 2 and therefore will be required to register and comply with the applicable AML/CFT requirements from 1 October 2023. By "non-executive director" we mean a director who receives remuneration or other compensation specifically for fulfilling the office of director, and not for some other role of which their office of director forms part (for example as a company/group employee, an executive director under a director's service contract for a specific role such as CEO or CFO, or an employee of a corporate services provider who provides director services to a company in that capacity).

Newly in-scope directors will be able to take advantage of some (albeit temporary and limited) concessions from the requirement to comply with Jersey's AML/CFT regime which are available until 30 September 2024. This includes the requirements to maintain policies, procedures and training to prevent and detect money laundering and to conduct a business risk assessment. It should be noted that, while Schedule 2 directors do not need policies and procedures, they still need to comply with the other applicable requirements of Jersey's AML/CFT regime (including the application of customer due diligence measures).

How to Register – Step-by-Step

Registration must be made through the JFSC's online portal at <https://myprofile.jerseyfsc.org/>

1. Choose the option to register and complete your details in order to obtain a login.
2. Once logged in, click on 'My Applications' and then 'New Application'.
3. From the drop-down menu, select 'Supervisory Bodies Law'.
4. Suggested responses to the questions are set out below:

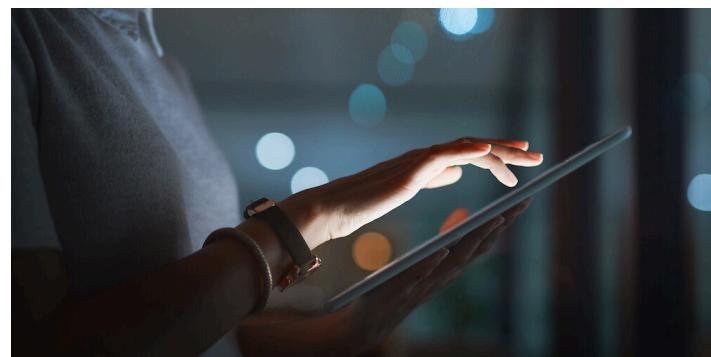
Question	Answer
Addresses	You will need to put in your address a number of times (even if this remains the same) at "registered office address", "business address", "address for correspondence" "contact address" and "residential address". You can insert your postcode and choose your address from the drop-down menu.
Legal form	Natural Person
Position held	Director
Activities of the applicant	Choose "Director" then click "Add activity"
<i>Describe the exact nature of your business, your principal activities and how you propose to conduct the activity(ies) described above</i>	Describe what you do giving the number of directorships you hold, the jurisdiction and type of the companies in relation to which you act as director.
Member of group	Answer these questions as they relate to you personally.
Confirm the number of employees	If you are a sole trader director, the answer will be 1 for each of the 3 years.
Total revenue	How much did you earn from your directorships last year?
Projected income	How much are you likely to earn from your directorships for the next three years?
Confirm projected total number of customers	How many companies do you provide director services to? How many board positions do you hold?
AML/CFT/CPF Governance	As noted above, certain requirements have been disapplied until 30 September 2024. This means that some of the questions in this section are not applicable until 30 September 2024.
<i>Have you performed an assessment of Money Laundering, Terrorist Financing and Proliferation Financing (ML/TF/PF) risks for all of your proposed activities?</i>	No – temporarily disapplied

You will still need to answer this question.

If you would like to discuss any aspects of the AML/CFT legislation as it relates to non-resident directors and resident non-executive directors, please speak to a member of our regulatory services team.

Carey Olsen Jersey LLP is registered as a limited liability partnership in Jersey with registered number 80.

Please note that this briefing is only intended to provide a very general overview of the matters to which it relates. It is not intended as legal advice and should not be relied on as such. © Carey Olsen Jersey LLP 2026.



Subscribe

Sign up to receive our news and briefings

[SIGN UP](#)