



## **White Paper on the FSI 2011**

### **Where to draw the line? Identifying secrecy jurisdictions for applied research**

Markus Meinzer<sup>1</sup>, Tax Justice Network

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#### **1. Introduction**

The Financial Secrecy Index (FSI) provides a way to map and expose offshore secrecy and the global infrastructure that creates it by identifying the relevant jurisdictions and ranking them according to both their secrecy and the scale of their activities. The FSI uses the term 'secrecy jurisdiction' interchangeably with the term 'tax haven', and both refer to a jurisdiction which "provides facilities that enable people or entities escape or undermine the laws, rules and regulations of other jurisdictions elsewhere, using secrecy as a prime tool"<sup>2</sup>.

A number of studies have used the FSI 2009 list of secrecy jurisdictions (or a modified version), for example for mapping the secrecy jurisdiction subsidiaries of multinational corporations. This list was compiled mainly by reviewing 11 lists of tax havens published by various organisations over the course of decades.

The FSI 2011 changed its methodology for selecting the jurisdictions under review. Instead of relying only on a review of prior lists, countries were added either because they were known to host a financial secrecy industry, or because of their large share in the global market for cross-border financial services. The outcome of this revision placed greater emphasis on the secrecy score for each jurisdiction, ranking them on a broad secrecy spectrum ranging from total secrecy to total transparency.

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<sup>1</sup> The author can be contacted at [markus@taxjustice.net](mailto:markus@taxjustice.net). Thanks to many tjn-activists for their contributions to this paper. Any feedback and comments welcome.

<sup>2</sup> [http://www.financialsecrecyindex.com/#what\\_is\\_secrecy\\_jurisdiction](http://www.financialsecrecyindex.com/#what_is_secrecy_jurisdiction); 28.9.2012.

As a consequence, the sample of jurisdictions analysed by the FSI 2011 was no longer equivalent to a definitive list of secrecy jurisdictions. While there are good reasons to continue emphasizing the secrecy spectrum, it is also clear that there are benefits in identifying a single set of jurisdictions for further research or policy making<sup>3</sup>. This white paper seeks to provide guidance for taking a decision on how to define such a set of jurisdictions.

It is important to emphasize that by offering such guidance, Tax Justice Network does not wish to imply that any of the suggested lists presents an accurate or right picture of the political responsibility for the consequences that the use of secrecy jurisdictions inflicts. Rather, it is only intended to guide the thinking of organisations interested in using the FSI for specific purposes (e.g. mapping subsidiaries of MNCs or challenging development banks for their tax haven investment holdings), but doing so requires them to make choices on their own behalf.

This paper reviews the known uses of FSI 2009 / 2011 in Chapter 2, and in Chapter 3 presents four alternative ways (which are the fruit of discussions on the tjn-activists emailing list in the first half of 2012) to arrive at a list. Chapter 4 will provide some recommendations. However, instead of one single list being promoted, contextual flexibility is called for.

## **2. Existing uses and brief history of FSI lists**

Even though it has not been applied consistently in all countries, the FSI 2009 list of secrecy jurisdictions appears to have served as a useful tool for undertaking further applied research on subsidiaries in tax havens and for questioning tax haven investments by development banks or aid agencies.

The selection of the countries reviewed by the FSI 2009 used a list-based approach, where 11 tax haven lists published by different researchers and organisations over the course of around 30 years were reviewed<sup>4</sup>. Every jurisdiction which was mentioned on at least two lists was included in FSI 2009,

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<sup>3</sup> While there are good reasons to create also a single definition of secrecy jurisdictions that can be used for policy making purposes, there are more risks than benefits in investing efforts to do so: First, even if such a single definition was found, new disagreements would surely come up, among others, regarding way the definition should be interpreted or politically implemented. Second, so far the term "secrecy jurisdiction" has been very useful in shaping a debate and it is important to continue travelling in this direction. Finally, given that the FSI is based on the interchangeable use of the terms 'tax haven' and 'secrecy jurisdiction', changing the basic definition risks reducing the consistency and coherence of the FSI.

<sup>4</sup> See page 1, here: [www.secrecyjurisdictions.com/Archive2009/Notes%20and%20Reports/SJ\\_Mapping.pdf](http://www.secrecyjurisdictions.com/Archive2009/Notes%20and%20Reports/SJ_Mapping.pdf); 27.8.2012.

subject to a few modifications to this rule: Niue, South Africa and Tonga were removed from the list, while Austria and Belgium were added because of their refusal to apply automatic information exchange under the EUSTD. The result was a list of 60 jurisdictions covered by the FSI 2009<sup>5</sup>.

Prior to the publication of the FSI 2009 in November 2009, a number of studies had looked into subsidiaries of multinational corporations in tax havens, inspired by original research undertaken by the US Government Accountability Office in December 2008. The list of tax havens used by the US-GAO report included 50 jurisdictions<sup>6</sup>. Notably absent from the list of tax havens were US-states (such as Delaware, Nevada and Wyoming) as well as the Netherlands as a major corporate tax avoidance conduit.

The study "Where on Earth Are You", published in April 2009 by TJN, reviewed tax haven subsidiaries of French, Dutch and British multinational corporations<sup>7</sup> based on a modified FSI 2009 list of secrecy jurisdictions, removing the Netherlands, UK and the USA for better comparability with the study published by the US Government Accountability Office. Similar research was later published on Swiss corporations<sup>8</sup> using the FSI 2009 list, including Delaware and the UK.

In the report "Investments for Development: Derailed to Tax Havens"<sup>9</sup> published in September 2010 by various European civil society organisations, the tax haven investments of European Development Finance Institutions were criticised. The report used a modified FSI 2009 list of secrecy jurisdictions (without the UK) to highlight the issue<sup>10</sup>.

In April 2011, Attac Germany published a list of tax haven subsidiaries of 6 German banks relying on the FSI 2009 list of secrecy jurisdictions, with minor adjustments leaving the UK out and adding Grünwald/Germany<sup>11</sup>.

In December 2010, the French NGO CCFD-Terre Solidaire published its report "An economy adrift" where the tax haven subsidiaries of 50 major European companies were mapped, based on the FSI 2009 list of secrecy jurisdictions minus the UK and the USA/Delaware<sup>12</sup>. A follow up publication in July 2012

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<sup>5</sup> [www.secrecyjurisdictions.com/Archive2009/FSI-2009/FSI%20-%20Rankings%20-%202009.pdf](http://www.secrecyjurisdictions.com/Archive2009/FSI-2009/FSI%20-%20Rankings%20-%202009.pdf); 27.8.2012.

<sup>6</sup> See pages 3 and 12-13 in [www.gao.gov/assets/290/284522.pdf](http://www.gao.gov/assets/290/284522.pdf); 27.8.2012.

<sup>7</sup> [www.taxjustice.net/cms/upload/pdf/45940CCBd01.pdf](http://www.taxjustice.net/cms/upload/pdf/45940CCBd01.pdf); 27.8.2012.

<sup>8</sup> [taxjustice.blogspot.com/2009/06/switzerland-companies-in-one-tax-haven.html](http://taxjustice.blogspot.com/2009/06/switzerland-companies-in-one-tax-haven.html); 27.8.2012.

<sup>9</sup> [www.eurodad.org/uploadedFiles/Whats\\_New/Reports/Investment%20for%20development.pdf?n=7931](http://www.eurodad.org/uploadedFiles/Whats_New/Reports/Investment%20for%20development.pdf?n=7931); 28.8.2012.

<sup>10</sup> See page 5, here: [www.eurodad.org/uploadedFiles/Whats\\_New/Reports/Investment%20for%20development.pdf?n=7931](http://www.eurodad.org/uploadedFiles/Whats_New/Reports/Investment%20for%20development.pdf?n=7931); 28.8.2012.

<sup>11</sup> [http://www.attac.de/fileadmin/user\\_upload/bundesebene/Pressegruppe/Deutsche%20Banken%20in%20Steueroasen%20Tabelle%20korrigiert.pdf](http://www.attac.de/fileadmin/user_upload/bundesebene/Pressegruppe/Deutsche%20Banken%20in%20Steueroasen%20Tabelle%20korrigiert.pdf); 28.8.2012.

<sup>12</sup> See page 54, here: [http://ccfd-terresolidaire.org/e\\_upload/pdf/ed\\_english\\_bdirectiftableau111116\\_2.pdf](http://ccfd-terresolidaire.org/e_upload/pdf/ed_english_bdirectiftableau111116_2.pdf); 28.8.2012.

looked at the geography of secrecy jurisdiction subsidiaries of French banks, based on the modified FSI 2009 list<sup>13</sup>.

In September 2011 CCFD-Terre Solidaire published a report prior to the G20 summit in Cannes in which it compared the tax haven listings of OECD, FATF, France, the European Parliament and a modified FSI 2011 list of secrecy jurisdictions using a secrecy score of 60 as the cut-off point.

The FSI 2011 differed from the FSI 2009 in a number of ways. One main difference is the choice of the set of jurisdictions reviewed. The 2011 index widened the scope of the reviewed jurisdictions to 73 countries and departed from the list-based approach. In addition to the 60 jurisdictions covered in 2009, 13 new jurisdictions were covered of which four were added because of indications that these offer secrecy services, while nine were added based on their high share in the global market of financial services exports (all the top 20 are covered<sup>14</sup>).

In April 2012, the Basel Institute on Governance launched its Basel Anti-Money Laundering (AML) Index which assesses the risk of money laundering in over 140 countries. This is a composite index relying on multiple other indices and the FSI 2011 is one component in the category of "money laundering and terrorist financing risk"<sup>15</sup>.

Two instances of use of the FSI in the private sector are known so far. First, the French bank Crédit Coopératif decided in January 2012 not to maintain or establish affiliates, nor to invest or finance projects in jurisdictions that received a secrecy score higher than 70 in the FSI 2011, except for EU member states. This results in a list of 47 countries being targeted by their tax haven policy<sup>16</sup>.

The second example relates to a decision by the German sustainability rating agency imug to include the FSI in their sustainability rating of bonds emitted by banks. In this context, the bonds of more than 100 banks are assessed against a cut-off secrecy score of 68 as measured by the 2011 index for defining secrecy jurisdictions. The first assessment cycle was carried out in 2011<sup>17</sup>.

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<sup>13</sup> See pages 10-12 and 31, in: [http://ccfd-terresolidaire.org/e\\_upload/pdf/ccfd\\_paradisfiscaux2012b\\_xs.pdf](http://ccfd-terresolidaire.org/e_upload/pdf/ccfd_paradisfiscaux2012b_xs.pdf); 28.8.2012.

<sup>14</sup> See page 3 in: [www.secrecyjurisdictions.com/PDF/SJ-Methodology.pdf](http://www.secrecyjurisdictions.com/PDF/SJ-Methodology.pdf); 29.8.2012.

<sup>15</sup> <http://index.baselgovernance.org/Index.html#methodology>; 29.8.2012. More background to the Basel AML Index can be found in this pdf: [www.index.baselgovernance.org/Project\\_Description.pdf](http://www.index.baselgovernance.org/Project_Description.pdf); 29.8.2012.

<sup>16</sup> To find out more, please contact Mathilde Dupré from CCFD-Terre Solidaire at [m.dupre@ccfd.asso.fr](mailto:m.dupre@ccfd.asso.fr).

<sup>17</sup> For details see [www.csreurope.org/data/files/For\\_news/01\\_imug\\_Rating\\_Criterion\\_Secrecy\\_Jurisdictions\\_Tax\\_Avoidance\\_2012\\_05\\_22.pdf](http://www.csreurope.org/data/files/For_news/01_imug_Rating_Criterion_Secrecy_Jurisdictions_Tax_Avoidance_2012_05_22.pdf); 29.8.2012.

### 3. Suggestions for cut-off decision-making

It is clear that the available lists of tax havens published by the OECD and others are politically tainted (as shown by various reports<sup>18</sup>) and therefore cannot serve as a basis for objective analysis.

To have one single list of secrecy jurisdictions is tempting because it promises to:

- facilitate cross-country consistency & comparability of research,
- allow civil society to speak with one voice internationally,
- can drive policy change at a quicker pace.

However, there are also risks inherent in an attempt to have one single list, including:

- the process may consume a lot of time and resources and possibly end in conflict and/or without result,
- the arbitrariness of every cut off reduces credibility of FSI ,
- increased messaging complexity of FSI,
- only usual suspects may be covered by the list (too short a list),
- the list makes policy recommendations and research unfeasible (too long a list),
- changes in the cut off and/or list over time may be difficult to justify.

In order to mitigate the benefits and risks we outline five different approaches to listing secrecy jurisdictions, each with their pro and cons (see table 1 below). The lists themselves can be seen in table 2 below, and with better readability in Annex 1 at the end of the report.

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<sup>18</sup> For example, see this report by CCFD-Terre Solidaire of 2011, on pages 7-10: [http://ccfd-terresolidaire.org/e\\_upload/pdf/ccfd-rapport-g20-2011-net.pdf](http://ccfd-terresolidaire.org/e_upload/pdf/ccfd-rapport-g20-2011-net.pdf). sdfIn addition, see the "Creeping Futility" report published by TJN in 2012, on page 10: [www.taxjustice.net/cms/upload/GlobalForum2012-TJN-Briefing.pdf](http://www.taxjustice.net/cms/upload/GlobalForum2012-TJN-Briefing.pdf); 31.8.2012.

**Table 1:** Summary of 5 possible secrecy jurisdiction lists based on the FSI

<b>Name</b>	<b>Short description</b>	<b>Pro</b>	<b>Contra</b>
1. Top Quartile Score (=18 countries)	Jurisdictions sorted by descending secrecy score, and then the upper quarter of the entire sample of jurisdictions is taken	<ul style="list-style-type: none"> <li>- Short list likely to create little friction/political controversy in mainstream</li> <li>- No annual discussion about what the correct cut-off secrecy score will be</li> </ul>	<ul style="list-style-type: none"> <li>- Actual problem of large secrecy centres is ignored</li> <li>- Credibility of this list is low as it only includes usual suspects</li> <li>- Countries get off list without improvement simply because another country is reviewed first time</li> </ul>
2. Two Thirds Secrecy (=50 countries)	Jurisdictions sorted by descending secrecy score, all those picked that have a secrecy score above 66	<ul style="list-style-type: none"> <li>- List of 50 covers three FSI main countries of concern</li> <li>- Appears to be good intuitive mix between usual suspects and surprises</li> <li>- Feasible list for research (and policy?)</li> <li>- media selling appears possible</li> </ul>	<ul style="list-style-type: none"> <li>- ultimately arbitrary cut off</li> <li>- at FSI 2013, new cut off needed?</li> <li>- (small) changes in methodology of FSI may be more contested if they result in list changes</li> </ul>

3. Round Number Secrecy (=54 countries)	Jurisdictions sorted by descending secrecy score, all those picked that have a secrecy score above 60	<ul style="list-style-type: none"> <li>- top 3 FSI countries covered</li> <li>- used once by CCFD-Terre Solidaire</li> <li>- includes Austria (as well as FSI top 3)</li> </ul>	- Japan may create problems for research and policy
4. Top Quartile Flows (=49 countries)	Jurisdictions sorted by descending secrecy score, then their weight is accumulated from top downwards until a cumulative weight of 25% has been reached	<ul style="list-style-type: none"> <li>- top 3 FSI countries covered</li> <li>- the list could remain the same even after new jurisdictions added / methodology improved</li> <li>- quantitative measure adds some credibility for choice ("quarter of dirtiest flows")</li> <li>- Feasible list for research (and policy?)</li> <li>- media selling appears possible</li> </ul>	<ul style="list-style-type: none"> <li>- countries could get off list simply because others increase their global market share, without improving themselves</li> <li>- ultimately arbitrary to focus on quartile of dirtiest flows</li> </ul>
5. FSI 2009 list (=60 countries)	Based on a review of eleven tax haven listings from various sources published over the course of 30 years	<ul style="list-style-type: none"> <li>- puts less emphasis on financial secrecy, and includes corporate tax avoidance havens</li> <li>- comprehensively covers all jurisdictions of great concern</li> <li>- In modified version has been used often for research, feasible for research</li> <li>- stability of the list and comparability of the results</li> </ul>	<ul style="list-style-type: none"> <li>- with UK and USA on board no policy achievements possible, difficulties for research</li> <li>- may create slight messaging problems for FSI 2011/2013</li> <li>- may create slight messaging problems because of outdatedness</li> </ul>

**Table 2: Overview of 5 possible secrecy jurisdiction lists based on the FSI**

Number of Countries		1. Top Quartile Score	2. Two Thirds Secrecy	3. Round Number	4. Top Quartile Flows	5. FSI 2009 List
Cut off secrecy score		18	50	54	49	60
Method		72 (=sample) divided by 4 = 18 jurisdictions)	Cut off at two thirds of maximum secrecy score 100% = 66,6	Cut off at a round number: secrecy score of 60	Sorted by descending secrecy score and then cumulative weight of jurisdictions up to one quarter of total flows	Taking all jurisdictions reviewed by FSI 2009. Sample based on review of 11 lists, incl. tax havens
FSI-2011 Jurisdictions, sorted by descending secrecy scores						
1 Nauru	93	x	x	x	x	x
2 Maldives	92	x	x	x	x	x
3 Turks & Caicos Islands	90	x	x	x	x	x
4 Marshall Islands	90	x	x	x	x	x
5 Belize	90	x	x	x	x	x
6 St Lucia	89	x	x	x	x	x
7 Vanuatu	88	x	x	x	x	x
8 Seychelles	88	x	x	x	x	x
9 Montserrat	86	x	x	x	x	x
10 Bermuda	85	x	x	x	x	x
11 Samoa	85	x	x	x	x	x
12 Brunei Darussalam	84	x	x	x	x	x
13 Macao	83	x	x	x	x	x
14 Netherlands Antilles	83	x	x	x	x	x
15 Bahamas	83	x	x	x	x	x
16 Grenada	83	x	x	x	x	x
17 Lebanon	82	x	x	x	x	x
18 Antigua & Barbuda	82	x	x	x	x	x
19 British Virgin Islands	81		x	x	x	x
20 St Kitts & Nevis	81		x	x	x	x
21 Liberia	81		x	x	x	x
22 Liechtenstein	81		x	x	x	x
23 Guatemala	81		x	x		
24 Dominica	80		x	x	x	x
25 Anguilla	79		x	x	x	x
26 United Arab Emirates (Dubai)	79		x	x	x	x
27 Ghana	79		x	x	x	
28 Barbados	79		x	x	x	x
29 San Marino	79		x	x	x	
30 Botswana	79		x	x	x	
31 Jersey	78		x	x	x	x
32 Gibraltar	78		x	x	x	x
33 Switzerland	78		x	x	x	x
34 Uruguay	78		x	x	x	x
35 St Vincent & Grenadines	78		x	x	x	x
36 Bahrain	78		x	x	x	x
37 Cayman Islands	77		x	x	x	x
38 Malaysia (Labuan)	77		x	x	x	x
39 Panama	77		x	x	x	x
40 Costa Rica	77		x	x	x	x
41 Cook Islands	75		x	x	x	x
42 Monaco	75		x	x	x	x
43 Aruba	74		x	x	x	x
44 Mauritius	74		x	x	x	x
45 Philippines	73		x	x	x	x
46 Hong Kong	73		x	x	x	x
47 Andorra	73		x	x	x	x
48 Singapore	71		x	x	x	x
49 Luxembourg	68		x	x	x	x
50 US Virgin Islands	68		x	x		x
51 Austria	66			x		x
52 Guernsey	65			x		x
53 Isle of Man	65			x		x
54 Japan	64			x		
55 Belgium	59					x
56 Israel	58					x
57 USA	58					x
58 Cyprus	58					x
59 Germany	57					
60 Canada	56					
61 Korea	54					
62 India	53					
63 Portugal (Madeira)	51					x
64 Netherlands	49					x
65 Italy	49					
66 Malta	48					x
67 Hungary	47					x
68 Latvia	45					x
69 United Kingdom	45					x
70 Ireland	44					x
71 Denmark	40					
72 Spain	34					



## 4. Recommendations

There is no perfect answer to the question of where to draw the line for the purpose of identifying secrecy jurisdictions and/or tax havens based on FSI data.

For policy-making, there is a general tendency to point fingers at others, preferably small and politically poorly connected jurisdictions. Therefore, a great deal of caution is warranted in how to frame any listing of jurisdictions and close follow-up is required in order to avoid abuse of any listing.

For research purposes, a distinction should be made between research aiming at revealing multinational's tax motivated profit shifting on the one hand, or uncovering a broader range of illegal and illicit activity on the other.

Option 1 and option 4 are advised against. Both rely on a relative cut-off which could result in a situation in which jurisdictions are removed from the list merely because the sample of countries has grown or because a listed country's market share has increased. This could result in countries getting off the list without actually improving their transparency, which is difficult to justify.

Among the remaining options 2, 3 and 5, no general recommendation can be given. Option 2 appears to be more feasible politically and easier to communicate to and for the media, while option 3 is bolder and more comprehensive. Both of these options are likely to result in a changed listing every two years (each time the FSI is freshly released), as it is to be expected that countries' secrecy scores change. If this approach provides an incentive to countries to take action to reduce their secrecy score, so much the better.

Option 5, the FSI 2009 listing, excludes some jurisdictions added in 2011. However, option 5 includes the UK and USA and might therefore be difficult to apply in practice without further modifications or specifications.

## Annex 1 – Full Overview Table of 5 Listings

	1. Top Quartile Score	2. Two Thirds Secrecy	3. Round Number	4. Top Quartile Flows	5. FSI 2009 List
<b>Number of Countries</b>	<b>18</b>	<b>50</b>	<b>54</b>	<b>49</b>	<b>60</b>
<b>Cut off secrecy score</b>	<b>None</b>	<b>66.6</b>	<b>60</b>	<b>None</b>	<b>Not Applicable</b>
<b>Method</b>	72 (=sample) divided by 4 = 18 jurisdictions)	Cut off at two thirds of maximum secrecy score 100% = 66,6	Cut off at a round number: secrecy score of 60	Sorted by descending secrecy score and then cumulative weight of jurisdictions up to one quarter of total flows	Taking all jurisdictions reviewed by FSI 2009. Sample based on review of 11 lists, incl. tax havens
<b>FSI-2011 Jurisdictions, sorted by descending secrecy scores</b>					
1 Nauru	93	x	x	x	x
2 Maldives	92	x	x	x	x
3 Turks & Caicos Islands	90	x	x	x	x
4 Marshall Islands	90	x	x	x	x
5 Belize	90	x	x	x	x
6 St Lucia	89	x	x	x	x
7 Vanuatu	88	x	x	x	x
8 Seychelles	88	x	x	x	x
9 Montserrat	86	x	x	x	x
10 Bermuda	85	x	x	x	x
11 Samoa	85	x	x	x	x
12 Brunei Darussalam	84	x	x	x	x
13 Macao	83	x	x	x	x
14 Netherlands Antilles	83	x	x	x	x
15 Bahamas	83	x	x	x	x
16 Grenada	83	x	x	x	x
17 Lebanon	82	x	x	x	x
18 Antigua & Barbuda	82	x	x	x	x
19 British Virgin Islands	81		x	x	x
20 St Kitts & Nevis	81		x	x	x
21 Liberia	81		x	x	x
22 Liechtenstein	81		x	x	x

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		1. Top Quartile Score	2. Two Thirds Secrecy	3. Round Number	4. Top Quartile Flows	5. FSI 2009 List
Number of Countries		18	50	54	49	60
Cut off secrecy score		None	66.6	60	None	Not Applicable
23	Guatemala	81	X	X	X	
24	Dominica	80	X	X	X	X
25	Anguilla	79	X	X	X	X
26	United Arab Emirates (Dubai)	79	X	X	X	X
27	Ghana	79	X	X	X	
28	Barbados	79	X	X	X	X
29	San Marino	79	X	X	X	
30	Botswana	79	X	X	X	
31	Jersey	78	X	X	X	X
32	Gibraltar	78	X	X	X	X
33	Switzerland	78	X	X	X	X
34	Uruguay	78	X	X	X	X
35	St Vincent & Grenadines	78	X	X	X	X
36	Bahrain	78	X	X	X	X
37	Cayman Islands	77	X	X	X	X
38	Malaysia (Labuan)	77	X	X	X	X
39	Panama	77	X	X	X	X
40	Costa Rica	77	X	X	X	X
41	Cook Islands	75	X	X	X	X
42	Monaco	75	X	X	X	X
43	Aruba	74	X	X	X	X
44	Mauritius	74	X	X	X	X
45	Philippines	73	X	X	X	X
46	Hong Kong	73	X	X	X	X
47	Andorra	73	X	X	X	X
48	Singapore	71	X	X	X	X
49	Luxembourg	68	X	X	X	X
50	US Virgin Islands	68	X	X		X
51	Austria	66		X		X
52	Guernsey	65		X		X
53	Isle of Man	65		X		X
54	Japan	64		X		
55	Belgium	59				X

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<b>Cut off secrecy score</b>	<b>None</b>	<b>66.6</b>	<b>60</b>	<b>None</b>	<b>Not Applicable</b>
56 Israel	58				X
57 USA	58				X
58 Cyprus	58				X
59 Germany	57				
60 Canada	56				
61 Korea	54				
62 India	53				
63 Portugal (Madeira)	51				X
64 Netherlands	49				X
65 Italy	49				
66 Malta	48				X
67 Hungary	47				X
68 Latvia	45				X
69 United Kingdom	45				X
70 Ireland	44				X
71 Denmark	40				
72 Spain	34				