
FICA RISK MANAGEMENT & COMPLIANCE PROGRAMME

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1. INTRODUCTION

The Risk Management and Compliance Programme (RMCP) is a legislative requirement in terms of the FIC Amendment Act, 2017 and replaces the former requirement for Internal Rules as described by the Financial Intelligence Centre Act of 2001.

The Amendment Act requires Smit Adviseurs CC to develop, document, maintain and implement a programme for anti-money laundering and counter-terrorist financing risk management and compliance which is unique to our business. This involves ensuring that we understand our own exposure to money-laundering and terrorist-financing risks so that we can apply a risk-based approach to managing these risks in our business. We take this responsibility seriously and will ensure that all staff at all the branches is aware of the risk-based approach.

2. POLICY STATEMENT

Money laundering is an activity which has or is likely to have the effect of concealing or disguising the nature, source, location, disposition or movement of the proceeds of unlawful activities or any interest which anyone has in such proceeds and includes any activity which constitutes an offence in terms of section 64 of the Act or sections 4, 5 or 6 of the Prevention Act.

Generally, money laundering occurs in three stages. Cash first enters the financial system at the “placement” stage, where the cash generated from criminal activities is placed in the formal financial system. At the “layering” stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. This is an attempt to disguise the true nature of the funds. At the “integration” stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses.

Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal either the origin of the funds or their intended use, which could be for criminal purposes. Legitimate sources of funds are a key difference between terrorist financiers and traditional criminal organisations. Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terrorist operations can be the same or similar to methods used by other criminals to launder funds. Funding for terrorist attacks does not always require large sums of money and the associated transactions may not be complex.

Our AML/CFT policies, procedures and internal controls are designed to ensure compliance with all applicable FICA legislation and will be reviewed and updated on a regular basis to ensure that appropriate policies, procedures and internal controls are in place to account for both changes in regulations and changes in our business.

3. GENERAL DUTIES

Section 42 of the FIC Act (as amended) requires our firm to develop, document, maintain and implement a Risk Management and Compliance Programme (RMCP) which provides for the necessary procedures to discharge our duties in terms of the Act, its Regulations and Guidance.

Sections 11 & 12 of the FAIS General Code of Conduct also require that we structure internal control procedures to ensure that all the applicable laws are complied with. Section 37(2)(b)(ii) of the Determination of Fit and Proper Requirements specifies that to maintain the required operational ability, an SMIT ADVISEURS CC must ensure compliance with applicable laws, including the FIC Act and other applicable anti-money laundering or terrorist financing legislation. Therefore, the RMCP forms part of our Governance and Risk Management Framework.

1. As an accountable institution, we have a duty to:
2. Register as an accountable institution with the FIC;
3. Ensure appropriate governance measures;
4. Develop, document, maintain and implement an anti-money laundering and counter-terrorist financing risk management and compliance programme;
5. Perform customer due diligence using a risk-based approach;
6. Maintain records;
7. Report;
8. Train all our staff.

If Smit Adviseurs CC fails to comply with its duties in accordance with the FIC Act (as amended) and Regulations, it will be regarded as being non-compliant and will be subject to an administrative sanction.

4. OBJECTIVE

The Risk Management and Compliance Programme (RMCP) forms the foundation of Smit Adviseurs CC compliance with our obligations under the FIC Amendment Act.

The objective of the RMCP is to enable our firm to apply a risk-based approach and to:

1. Identify ML/TF risks which we may face within the context of our business,
2. Assess or analyse these risks with a view to understand how the ML/TF risks may affect Smit Adviseurs CC,
3. Monitor these risks on an ongoing basis,
4. Mitigate these risks, and
5. Manage the risk of involvement in money-laundering activities or the financing of terrorist and related activities.

The RMCP must therefore be sufficient for countering the money laundering or terrorist financing risks facing our business.

The RMCP will:

- Enable all employees to identify what suspicious and unusual transactions are as well as the reporting process;
- Train employees to enable them to comply with the legislation and the RMCP when identifying and verifying client details and performing Customer Due Diligence;
- Enable our firm and all employees to comply with the record keeping requirements.




This RMCP must at all times be available to all employees as well as for inspection by any supervisory body and regulatory body such as the Financial Services Board.

5. GOVERNANCE

5.1. Accountability


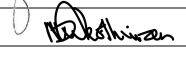
At Smit Adviseurs CC accountability and ultimate responsibility for compliance with the Act rests with the rest of the members of the Close Corporation.

The members of the Close Corporation hereby accepts ownership, accountability and responsibility for compliance with the FIC Amendment Act and hereby approves this version of the RMCP by signing in the table below.

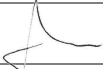

Name	Capacity	Date	Signature
JACOBUS SMIT	Member	27/03/2019	
FRANSINA H SMIT	Member	27/03/2019	
NADINE DU PLESSIS	Member	27/03/2019	

5.2. Compliance function

Smit Adviseurs CC hereby appoints JACOBUS SMIT & MARIETTE VD WESTHUIZEN to exercise oversight and management of the firm's AML/CFT duties and obligations and to assist the members of the Close Corporation to ensure effective management of the anti-money laundering and terrorist financing procedures of the firm. JACOBUS SMIT & MARIETTE VD WESTHUIZEN confirms that she has the required knowledge, skill and competence required of this function and accepts his/her appointment by signing the table below.

Name	Capacity	Date	Signature
JACOBUS SMIT	KI	22/11/2021	
MARIETTE VD WESTHUIZEN	KI	22/11/2021	

JACOBUS SMIT & MARIETTE VD WESTHUIZEN has been appointed to assist with the effective management of the anti-money laundering procedures of Smit Adviseurs CC. JACOBUS SMIT & MARIETTE VD WESTHUIZEN confirms that she has sufficient competence and seniority to ensure the effectiveness of the compliance function and hereby accepts his/her appointment by signing the table below.

Name	Capacity	Date	Signature
JACOBUS SMIT	KI	22/11/2021	
MARIETTE VD WESTHUIZEN	KI	22/11/2021	

The JACOBUS SMIT & MARIETTE VD WESTHUIZEN is responsible for:

- Reporting of Cash Threshold Reports, Terrorist Property Reports and Suspicious or Unusual Transactions online to the Centre.
- Training of all employees regarding the RMCP, Reporting and Recordkeeping duties of the accountable institution;
- Maintenance and review of the RMCP and all money laundering related policies and procedure;
- Ensuring that the RMCP is available to all employees;
- Effective implementation and monitoring of customer due diligence procedures which must include client risk rating and source of fund verification;
- Liaising with representatives of the Centre;
- Registration and maintenance of the accountable institution's information on FIC's website;
- Reporting to the members of the Close Corporation on a regular basis.

5.2.1. Implementation of the RMCP in Branches

Section 42(2)(q) of the FIC Act (as amended) requires the RMCP to include the manner in which the RMCP will be implemented across all branches, subsidiaries or other operations in foreign countries to enable compliance with its obligations. The RMCP will be send via e-mail to all the branches of Smit Adviseurs CC, each staff member will sign a confirmation that training was provided and that they have read the RMCP.

5.3. Review of the RMCP

JACOBUS SMIT & MARIETTE VD WESTHUIZEN together with the JACOBUS SMIT & MARIETTE VD WESTHUIZEN is responsible to review the RMCP at least ANNUALLY to ensure that it remains relevant to the operations of our firm and to ensure compliance with relevant legislation. Proposed amendments must be submitted to the members of the Close Corporation for consideration and formal approval. It is the responsibility of the members of the Close Corporation to ensure that the revised RMCP meets all Smit Adviseurs CC's obligations in terms of the Act.

In addition to the standard, regular review, the RMCP must also be reviewed whenever there are any significant and material changes to the operations of Smit Adviseurs CC which would impact the money laundering and terrorist financing risks faced by the business. For example, if there is a change in the products and services offered to clients, the geographical location

7. CONSEQUENCES OF NON-COMPLIANCE

Any employee of Smit Adviseurs CC, who fails to comply with the provisions of the FIC Amendment Act, its Regulations and the RMCP, whether through negligence or intent, will be formally disciplined in accordance with our disciplinary policy and procedure.

If it is found, during this hearing, that the contravention was committed through gross negligence or intent and that this placed Smit Adviseurs CC or its employees at risk of being charged under the FIC Amendment Act, such a person shall be dismissed.

Any such contravention will be reported by the members of the Close Corporation with the assistance of the person appointed to assist with the compliance function to the relevant authorities where necessary.

8. REGISTRATION

JACOBUS SMIT & MARIETTE VD WESTHUIZEN is required to initiate the registration process on behalf of the members of the Close Corporation of Smit Adviseurs CC to ensure that the firm complies with the provisions of the FIC Amendment Act.

The unique registration number (ORG ID number) for Smit Adviseurs CC is ORG ID30402.

JACOBUS SMIT & MARIETTE VD WESTHUIZEN is responsible to keep the log-in details safe. If JACOBUS SMIT & MARIETTE VD WESTHUIZEN resigns from Smit Adviseurs CC, she is responsible to ensure an appropriate hand-over of the roles and responsibilities in relation to the registration of Smit Adviseurs CC with the FIC.

8.1. Changes to Information

JACOBUS SMIT & MARIETTE VD WESTHUIZEN must inform the Centre of any changes to Smit Adviseurs CC's details by updating the accounts online within **90 (ninety) days** of such change, as required in terms of section 43B(4) of the FIC Act (as amended) or at least 30 DAYS day's prior to the effective date of the JACOBUS SMIT & MARIETTE VD WESTHUIZEN's resignation.

8.2. Penalties

Failure to register or provide information pertaining to changes is regarded as being non-compliant in terms of Section 61A of the FIC Act (as amended) and is subject to an administrative sanction.

9. REGULATORY FRAMEWORK

Money laundering is the manipulation of illegally acquired wealth to obscure its true nature or source. The goal of money laundering is firstly to place illegal money in the formal financial system without arousing suspicion and secondly, to transfer and move money around in a series of complex transactions, so it becomes difficult to trace its original source.

The legislation mentioned below was effected to prevent money laundering:

- **FICA (Financial Intelligence Centre Act) as amended by Act 1 of 2017**
 - Provides for the establishment of the Financial Intelligence Centre which creates obligations for accountable institutions. It also regulates the reporting of terrorist related activities.
 - The main objective of the amendments is to place a Risk Based Approach at the core of South Africa's anti-money laundering and combating of financing of terrorism framework. This gives financial institutions the flexibility to assess and manage the risks in their businesses. The Act aims to improve the transparency and integrity of South Africa's financial system. Non-compliance with the Act can either be regarded as a criminal offence or be subject to an administrative sanction.
- **POCA (Prevention of Organised Crime Act)**
 - This Act deals with money laundering, racketeering and criminal and civil forfeiture. POCA sets out money laundering offences. It also creates a general reporting obligation for businesses coming into possession of suspicious transactions.
- **POCDATARA (Protection of Constitutional Democracy Against Terrorism and Related Activities Act)**
 - This Act provides for new reporting obligations under FICA. The reporting of suspicious and unusual transactions was extended to cover transactions relating to property which is connected to an offence relating to the financing of terrorist and related activities, or to the financing of terrorist related activities.

9.1. Key Definitions

Unlawful Activity: Is defined as conduct which constitutes a crime, or which contravenes any law, whether such conduct occurred before or after the commencement of POCA and whether such conduct occurred in the Republic or elsewhere.

Proceeds of Unlawful Activities: Is defined for purposes of POCA and FICA as any property or any service, advantage, benefit or reward which was derived, received or retained, directly or indirectly, in the Republic or elsewhere, at any time before or after the commencement of POCA, in connection with or as a result of any unlawful activity carried on by any person, and includes any property representing property so derived.

Accountable Institution: Means all businesses or persons listed in Schedule 1 to the FIC Act and includes (but is not restricted to), all listed companies, all estate agents, all insurance companies, all insurance intermediaries and all unit trust management companies. All these entities have certain obligations in terms of the Act and these are set out in this RMCP.

Business Relationship: As opposed to a once-off transaction means a continuing arrangement between two or more parties at least one of whom is acting in the course and scope of business (typically the institution and a customer or client) where transactions are facilitated between the parties on a regular or habitual basis.

Beneficial Owner: A natural person who ultimately owns or exercises control over a legal entity or structure.

Single Transaction: is a transaction which can be described as occasional or once-off business. It is a transaction other than a transaction concluded in the course of a business relationship and where the value of the transaction is higher than the amount prescribed (determined by the Minister in the Regulations).

10. APPROACH TO RISK

Smit Adviseurs CC's approach is to identify the money laundering and terrorist financing risks having regard to the financial products, services, geographical location of the business, the clients of Smit Adviseurs CC and the method of delivery of our services.

Smit Adviseurs CC will adopt a qualitative approach to ML/TF risks based on the overall assessment of the factors listed above in respect of each individual client to determine the client's risk profile and associated due diligence measures to be followed.

10.1. Risk Factors

To assess the overall risk of each client requires a clear understanding of the money laundering and terrorist financing risks which are relevant to Smit Adviseurs CC as a business. To identify the risks to which the business is exposed requires an in-depth assessment of risk factors prevalent in the business.

As a starting point Smit Adviseurs CC has identified the following risk factors it will consider in determining the overall risk level of a client:

- Geographical location
- Customer risks (including client co-operation and behaviour)
- Product and services (including size of transaction)
- Delivery method (i.e. client interactions)

10.2. Risk Indicators and Scores

We have considered each risk factor and identified risk indicators which fall within each risk factor and which are relevant to Smit Adviseurs CC. These risk indicators have been listed in Annexure A.

In accordance with our exposure to ML/TF risk, Smit Adviseurs CC will classify each risk indicator as being either low, medium, high or extremely high risk. Smit Adviseurs CC has used the FIC's previous Regulations and Exemptions as guidance in determining the level of each risk.

We have assigned a measurable score to each level of risk as set out in the table below:

Risk Level	Risk Score	Explanation
Low	1	A low risk measure will be used where the likelihood and impact of money laundering and/or terrorist financing is extremely low. A Simplified Customer Due Diligence Process will be followed where the overall risk profile of a client has been determined as low risk.
Medium	2	A medium risk measure will be used where there is an average likelihood and impact of money laundering and/or terrorist financing. A Standard Customer Due Diligence Process will be

		followed where the overall risk profile of a client has been determined as medium risk.
High	3	A high-risk measure will be used where there is a higher likelihood and impact of money laundering and/or terrorist financing. An Enhanced Customer Due Diligence Process will be followed where the overall risk profile of a client has been determined as high risk.
Extremely High	100	Any client with whom Smit Adviseurs CC is prohibited from dealing with will fall into this category and must immediately be reported to the FICA Compliance Officer.

10.3. Client Risk Profile

Smit Adviseurs CC will critically consider each risk indicator, together with its associated risk level, when determining the overall Risk Profile of the Client.

Smit Adviseurs CC has decided that the Risk Profiles to be assigned to a client will default to the highest risk level identified.

For example, if there is only 1 risk indicator relevant to a client that has been identified as high risk, the client will automatically be assigned a high-risk profile. If the JACOBUS SMIT & MARIETTE VD WESTHUIZEN reviews the client and determines that a lower risk profile can be assigned to the client, this must be accompanied by a detailed motivation setting out the reasons for the decision.

10.4. Risk Review

The members of the Close Corporation is responsible to evaluate each risk and to determine an appropriate risk level. AM/TF risks must be reviewed ANNUALLY. Smit Adviseurs CC is also committed to reviewing the risk factors should there be any material change to the business or legislation which could impact the risks to which the business is exposed.

10.5. Risk Mitigation Measures

Smit Adviseurs CC has implemented a method it will use to control and minimise the ML/TF risks it has identified. The “Know Your Client Checklists” (Annexure L to R) specify how we will verify the identity of our clients and mitigate our possible exposure to risk. Smit Adviseurs CC has identified three processes that we will follow to verify the identity of our clients that is, simplified, standard and enhanced.

Where there are higher ML/TF risks, Smit Adviseurs CC has put in place enhanced measures to mitigate those risks. This means that the range, degree, frequency or intensity of preventive measures and controls conducted will be stronger in higher risk scenarios.

Where the ML/TF risks are assessed as lower, Smit Adviseurs CC has agreed that simplified measures may be permitted. This means that measures must respond to certain Customer Due Diligence measures, but that the degree, frequency and/or the intensity of the controls conducted will be relatively lighter.

Using the measures listed in the table above, different due diligence processes for the different stages or engagements with a client through the course of the business relationship will be used, as follows:

Client Risk Profile	Initial Customer Due Diligence	Ongoing Customer Due Diligence
Low	Simplified	Simplified
Medium	Standard	Standard
High	Enhanced	Enhanced
Extremely High	Prohibited from entering into or continuing in a business relationship and/or entering into a single transaction.	

11. CUSTOMER DUE DILIGENCE

The objective of performing customer due diligence is for Smit Adviseurs CC to ensure that we have a thorough knowledge about a client and a comprehensive understanding of the business that a client is conducting with us. This process will enable Smit Adviseurs CC to manage the relationships which we have with our clients and to better identify possible attempts by clients to exploit the products and services which we can offer for illicit purposes.

To reduce the likelihood or threat of facilitating money laundering or terrorist financing or related activities, we at Smit Adviseurs CC will conduct appropriate customer due diligence as follows:

- Before entering into a new business relationship or concluding a single transaction with a customer. We have termed this the Client Take-On Due Diligence Process and the method of obtaining and evaluating information will be done by using the “Onboarding Questionnaires” (Annexures B to E);
- Before concluding a transaction in the course of a business relationship or performing any act to give effect to a single transaction. We have termed this the Transactional Due Diligence Process and the method of obtaining and evaluating this information will be done by using the “Transactional Due Diligence Questionnaire” (Annexure F); and
- At regular intervals during a business relationship. We have termed this the Ongoing Due Diligence Process and the method of obtaining and evaluating this information will be via the “Ongoing Due Diligence Questionnaire” (Annexure G).

Refer to Annexure S for a diagrammatical illustration of the due diligence process.

11.1. Prospective or Existing Client

When any employee engages with a client who wishes to enter into a business relationship or conclude a single transaction, the employee must first establish if the client is an existing client or a prospective client.

The information of all existing clients who have either established a business relationship or who have previously concluded a single transaction with Smit Adviseurs CC is stored in the CRM system Tasklogix.

The employee must, at a minimum, conduct separate searches of the CRM system using the criteria listed below, to establish if the person is an existing client:

- Identity Number and, where applicable, Passport Number;
- Surname;
- Full First Name;
- Last address.

11.2. CLIENT TAKE-ON DUE DILIGENCE PROCESS

If it has been established that the client is a prospective client (i.e. not an existing client of Smit Adviseurs CC) then complete the “Onboarding Questionnaires” (Annexures B to E) to ensure compliance with the sections listed above.

Before accepting a prospective client either in respect of a new business relationship or to conclude a single transaction the following needs to be established:

1. Identity of the client and Beneficial owner(s);
2. Nature of the business relationship;
3. Whether the client is a DPIP, FPPO or UN sanctioned person through screening of the client; and
4. Risk Profile of the client;
5. Whether the client can be accepted or not.

11.2.1. Customer Identification and Verification

Section 21 and 21B require Smit Adviseurs CC, as an accountable institution, to establish and verify the identity of clients and relevant persons. This is the first step in the customer due diligence process.

The purpose of this process is to ensure that we, Smit Adviseurs CC, know who we are dealing with and that we are confident that the person is who they say they are. Establishing the identity of a client also allows us to obtain a range of information from the client. The process of verifying a client’s identity involves corroborating the person’s identity by comparing this with information contained in documents or electronic data which must be issued or created by a reliable and independent third-party source.

The intensity or degree to which the information is verified or corroborated may differ depending on the overall risk profile of the client. The information and the intensity of the information we require is set out in the “Know your Client Checklists”.

11.2.1.1. Beneficial Owners

Smit Adviseurs CC has an obligation to establish the ownership and control structure of a legal person which must include establishing the identity of the beneficial owner(s).

Smit Adviseurs CC will follow a process of elimination as described in Guidance Note 7 published by the FIC. The steps set out below must be followed:

1. Determine who the natural person is who independently or together with another person has a controlling ownership interest in the legal person. Any person with ownership of 25% or more of the shares with voting rights in a legal person, will have sufficient control of the entity.
2. If the ownership interests do not indicate a beneficial owner, or if there is doubt as to whether the person with the controlling ownership interest is the beneficial owner, then Smit Adviseurs CC will identify the natural person who exercises control of the legal person through other means. For example, natural persons who exercise control through voting rights attaching to different classes of shares or through shareholder agreements.
3. If no natural person can be identified who exercises control through other means, then Smit Adviseurs CC must determine the natural person who exercises control over the management of the legal person which can include an executive officer, non-executive director, independent non-executive director, director or manager.

The identity(ies) of the beneficial owner(s) or persons exercising control over the legal entity must be recorded in the Onboarding Questionnaire for Legal Persons (Annexure C). The intensity or degree to which the information is verified or corroborated for each beneficial owner may differ depending on the overall risk profile of the client. The information and the intensity of the information we require is set out in the "Know your Client Checklists".

11.2.2. Understanding the Business Relationship

To enable Smit Adviseurs CC to determine whether any future transactions which are performed in the course of the business relationship are consistent with our knowledge of the prospective client, information must be obtained to establish:

- the expected frequency of transactions;
- the expected product selections of future transactions;
- the expected value of future transactions.

11.2.3. Customer Screening

Smit Adviseurs CC will conduct screening of all its customers to determine if a client is:

- a foreign prominent public official (FPPO),
- a domestic prominent influential person (DPIP); or
- a sanctioned person or entity as identified by a United Nations Sanction Council.

Smit Adviseurs CC has appointed JACOBUS SMIT & MARIETTE VD WESTHUIZEN to perform Sanctions Screening and Research. Screening will be done as part of the customer

due diligence processes and at any stage when the UNSC adopts new TFS measures or expands existing ones.

Smit Adviseurs CC will deal with clients who appear on the UN Security Council List, who are DPIPs and FPPOs in the ways stated below.

The FIC website will be utilized:

www.fic.gov.za

11.2.3.1. Prohibition relating to a person or entity identified pursuant to the UN Security Council

Example Text:

Smit Adviseurs CC will Conduct Sanctions Screening to establish if:

- the client is a person or entity identified pursuant to a resolution of the Security Council of the United Nations;
- the client or other relevant person is an entity which has committed or attempted to commit or facilitated the commission of a specified offence as defined in POCDATARA;
- the client or other relevant person is an entity identified in a notice issued by the President under Section 25 of POCDATARA.

To conduct such screening, Smit Adviseurs CC will search commercial databases or websites to screen and research a client.

We will use the following www.fic.gov.za

DO NOT establish a business relationship or conclude a single transaction with any person identified in this section.

This must immediately be reported to JACOBUS SMIT & MARIETTE VD WESTHUIZEN who is required to follow the necessary reporting process.

11.2.3.2. Domestic Prominent Influential Person

Schedule 3A to the FIC Act contains a list of positions that will be considered domestic prominent influential persons. This is further stated in Annexure H.

Business relationships with domestic prominent influential persons (DPIP) are not inherently high-risk. Smit Adviseurs CC will consider each such relationship on its own merits to determine whether there is any reason to conclude that it brings higher risk of abuse for money laundering and terrorist financing purposes.

We will conduct screening to establish if the client or an immediate family member or known close associate of the client is a DPIP by completing the Domestic Prominent Influential Persons Questionnaire (Annexure H).

To fulfil our obligations and ensure that appropriate measures are put in place to mitigate the risks related DPIPs, once the client's identity has been verified and all the necessary information about the client has been obtained, all documentation must be submitted to *JACOBUS SMIT & MARIETTE VD WESTHUIZEN* for consideration. *JACOBUS SMIT &*

MARIETTE VD WESTHUIZEN must evaluate all the information, to establish the risk profile of the DPIIP.

If it is found that the risk is high, Smit Adviseurs CC will apply the same requirements as for foreign prominent public officials as stated below.

11.2.3.3. Foreign Prominent Public Official

Smit Adviseurs CC must treat all business relationships with foreign prominent public officials as high-risk as stipulated by FICA.

To fulfil our obligations and ensure that appropriate measures are put in place to mitigate the risks related to such foreign prominent public officials:

- We will conduct screening to establish if the client or an immediate family member or known close associate of the client is a FPPO by completing the Foreign Prominent Public Official Questionnaire (Annexure I).
- Reasonable measures must be taken to establish the source of wealth and source of funds of the client. This information must be recorded on Annexures H and I;
- Once the client's identity has been verified and all the necessary information about the client has been obtained, all documentation must be submitted to *JACOBUS SMIT & MARIETTE VD WESTHUIZEN* for consideration. *JACOBUS SMIT & MARIETTE VD WESTHUIZEN* must evaluate all the information, where required conduct further research and request additional information and/or documentation.
- Once all information has been assessed, *JACOBUS SMIT & MARIETTE VD WESTHUIZEN* must take a decision to accept or reject the client. This decision must be recorded in the relevant section in Annexures B to E and signed by [FICA COMPLIANCE OFFICER]. *JACOBUS SMIT & MARIETTE VD WESTHUIZEN*.
- Enhanced ongoing due diligence process of the business relationship must be conducted in accordance with the Ongoing Customer Due Diligence Process.

11.2.3.4. General Prohibitions

There are several scenarios where Smit Adviseurs CC will not or may not establish a business relationship or conclude a single transaction or may have to terminate an existing business relationship.

Before doing business with any customer, the following must be considered:

- If the client is anonymous or a client with an apparent false or fictitious name, then a business relationship may not be established, or a transaction concluded.
- If we are unable to:
 1. establish and verify the identity of a client or other relevant person in accordance with Section 21 or 21B of the FIC Amendment Act;
 2. obtain the information contemplated in Section 21A;
 3. conduct ongoing due diligence as contemplated in Section 21C;

THEN Smit Adviseurs CC:

May not establish a business relationship or conclude a single transaction;

May not conclude a transaction in the course of a business relationship, or perform any act to give effect to a single transaction; or

Must terminate an existing business relationship with the customer, based on the process set out in this policy.

11.2.4. Client Risk Profile

When assessing the information which has been gathered from the client in Annexures B to E, the overall risk profile of the client must be established taking into consideration the money laundering and terrorist financing risks to which the business is exposed as set out in Annexure A as well as the factors and risk indicators relevant to the actual client and the business relationship to be established.

Depending of the varied risk indicators our client presents, the key in Annexure A will determine whether our Client will be rated Low, Medium, High or Extremely High Risk (Refer to section 10 above).

Where approval is required by JACOBUS SMIT & MARIETTE VD WESTHUIZEN , the overall risk profile of the client must be decided by JACOBUS SMIT & MARIETTE VD WESTHUIZEN based on a holistic assessment of all information and documentation available.

In all other cases, the preliminary risk profile of the client must be determined by the employee engaging with the client by taking into consideration all the information and documentation obtained as prescribed, the risk factors and risk indicators and any other relevant factor.

The documentation required to verify the identity of the client, based on the established Risk Profile of the client, has been set out in the “KYC Checklists” in Annexures L to R.

11.2.4.1. Clients automatically assigned an Extremely High-Risk Profile

For the purposes of Smit Adviseurs CC business, any sanctioned person or entity as identified and pursuant to a resolution of the Security Council of the United Nations will automatically be assigned as “extremely high risk”.

Furthermore, any other person identified under General Prohibitions above, will automatically be assigned a risk profile of “extremely high risk”.

Smit Adviseurs CC is prohibited from dealing with any client which has been classified as extremely high risk and must immediately be reported to the FICA Compliance Officer for reporting to Financial Intelligence Centre.

11.2.4.2. When is Customer Due Diligence not required?

Smit Adviseurs CC will obtain a record at least some information describing the identity of the client.

Smit Adviseurs CC will not, in spite of a single transaction, deal with an anonymous client or a client with an apparent false or fictitious name.

Smit Adviseurs CC has set out the following examples of information that it will obtain:

- full name;
- identity number of the client;
- a contact number;
- residential Address, and

In certain instances, an added step of requesting to view an identification document of the client.

11.2.5. Client Acceptance

Once the risk profile of the client has been determined, the corresponding KYC Checklist must be followed as set out in Annexures L to R prior to entering into a business relationship with a client or concluding a single transaction

Upon completion of the Client Take-on Process and due diligence, a decision must be taken as to whether the client is accepted.

At the end of the relevant Onboarding Questionnaire (Annexures B to E), a field is available to note whether the Client is accepted or declined.

11.3. TRANSACTIONAL DUE DILIGENCE PROCESS

Smit Adviseurs CC must compare each Transaction against the information provided during the formation of the Business relationship. Smit Adviseurs CC will ensure that when an existing client approaches us to conclude another transaction, we will ensure that checks be put in place to ensure that these transactions are consistent with the Smit Adviseurs CC understanding/or expectation of the Business Relationship as documented in the relevant Onboarding Questionnaire (Annexures B to E). Therefore, as a starting point Smit Adviseurs CC will have the information from the Onboarding Questionnaire (Annexures B to E) on hand when conducting a Transactional Due Diligence review. SMIT ADVISEURS CC will use the Transactional Due Diligence Questionnaire (Annexure F) to draw the following information in order to verify, an already established, Business Relationship:

- Nature of the transactions;
- Type of Product;
- Value of the Transaction, and
- Source of funds that will finance the transaction

Where certain pertinent information has changed and if the transactions are not consistent with the Smit Adviseurs CC understanding of the Client, Smit Adviseurs CC'S Transactional Due Diligence Questionnaire (Annexure F) will direct the person completing the questionnaire to complete a new Onboarding Questionnaire in order to Risk Rate the client again. The rationale behind this is that if information has changed, this could affect the Client's risk profile, and this could have far reaching implications for Smit Adviseurs CC if we apply the incorrect risk rating to a Client. In addition to the aforementioned if Smit Adviseurs CC finds that the transactions are not consistent with the above-mentioned factors, Smit Adviseurs CC may have grounds to report a suspicion of money laundering or terrorist financing. Additional factors with regard to what constitutes a suspicion have been identified by Smit Adviseurs CC in section 13.3.4.

11.4. ONGOING DUE DILIGENCE PROCESS

To comply with provisions pertaining to Ongoing due diligence, Smit Adviseurs CC will scrutinise all of the transactions undertaken throughout the course of a business relationship to ensure that transactions are consistent with Smit Adviseurs CC knowledge of the client, the client's business and risk profile, and the source of funds. Smit Adviseurs CC will obtain the aforementioned information by completing an Ongoing Due Diligence Questionnaire (Annexure G).

Smit Adviseurs CC in doing so will also ensure that all documentation and information obtained about the Client is up to date, accurate and relevant. If the transactions or information are not consistent with the above-mentioned factors, Smit Adviseurs CC may have grounds to report a suspicion of money laundering or terrorist financing.

Once the risk profile or overall risk level of the client has been determined, the corresponding ongoing customer due diligence process must be followed at each point of customer engagement or transaction.

Client Profile	Risk	Ongoing Customer Due Diligence	Frequency of Ongoing Customer Due Diligence
Low		Simplified	3 Years
Medium		Standard	2 Years
High		Enhanced	Annually

12. DUTY TO MAINTAIN RECORDS

In keeping with section 22 and 22A of the FIC Act (as amended) Smit Adviseurs CC will ensure that records are kept in respect of the customer due diligence process undertaken by it whenever it establishes a business relationship or concludes a transaction with a client. Smit Adviseurs CC will ensure that the records of every transaction are also kept, and this includes records for single transactions as well as records for transactions concluded in the course of a business relationship.

Smit Adviseurs CC acknowledges that a failure to comply with the record keeping obligations as determined by the FIC Act (as amended) is regarded as being non-compliant and is subject to an administrative sanction.

12.1. Records to be kept

Smit Adviseurs CC has identified the records which it is compelled to keep in terms of the FIC Act (as amended).

A record of all information obtained by Smit Adviseurs CC during the customer due diligence process which relates to a client or a prospective client must be kept and must include:

- The identity of the client and, if applicable, the identity of the client's agent or principal;
- The manner in which this identity was established;

- The name of the person who obtained this information;
- Any document or copy obtained, or other means used by the Smit Adviseurs CC to verify the identity;
- The nature of the business relationship;
- The intended purpose of the business relationship;
- The source of funds.

A record of every transaction, whether the transaction is a single transaction or concluded in the course of the business relationship, must be kept and which must include but is not limited to:

- The nature of the business relationship or transaction;
- The amounts and currency in which it was denominated;
- The date that the transaction was concluded;
- The parties to the transaction;
- The nature of the transaction;
- All business correspondence;
- The identifying particulars of all accounts and account files related to the transaction if Smit Adviseurs CC provides account facilities.

12.2. Manner in which records must be kept

Since the FIC Act (as amended) is not prescriptive as to the manner in which records must be kept, we at Smit Adviseurs CC will ensure that records will be stored in accordance with our standard procedures for the capture of information and the retention of records.

Smit Adviseurs CC internal storage procedure is explained in greater detail below:

All client documents are stored on an external server which is backed-up daily and stored off site to ensure nothing is destroyed. Smit Adviseurs CC do have a Disaster Recovery Plan to ensure that all back-ups are safe and secure.

To reduce the volume and density of records, Smit Adviseurs CC will use the following mechanisms for storage of records (delete the mechanisms that are not applicable to your business or add the storage facilities used by the business):

- Internal networks
- Physical storage devices e.g. external servers.

12.3. Period for which records must be kept

Section 23 of the FIC Act (as amended) prescribes the period of time which Smit Adviseurs CC must keep records for and has been set out below.

12.3.1. Business Relationship

Smit Adviseurs CC will keep all records pertaining to the customer due diligence process to establish a business relationship, for at least 5 years from the date on which the business relationship is terminated.

12.3.2. Transactions

Smit Adviseurs CC in respect of a single transaction or a transaction concluded in the course of a business relationship, will keep records for at least 5 years from the date on which the transaction is concluded.

12.3.3. Transaction or activity which gave rise to a report

If a transaction or activity was reported to the Centre by Smit Adviseurs CC, then Smit Adviseurs CC will keep these records for a minimum of 5 years from the date on which the report was submitted to the Centre.

Smit Adviseurs CC acknowledges that the need to maintain adequate records for at least 5 years gives effect to the provisions of the FIC Act (as amended) and is essential to assist with the ultimate investigation and prosecution of crime if applicable.

12.3.4. General Provisions, Processes and Responsibility

12.3.4.1. Additional Information

In addition to the required information, Smit Adviseurs CC will ensure that records include the following details:

- Reference numbers on documents and letters;
- Dates such as issue or expiry;
- Details of the issuer or writer

12.3.4.2. FICA Recordkeeping Checklist

Smit Adviseurs CC will ensure that all the required detail regarding the establishment of the business relationship and every transaction will be completed on the Onboarding Questionnaire, Transactional Review Questionnaire and Ongoing Due Diligence Questionnaire. Relevant information will be completed for every transaction and will be stored in accordance with the manner in which records will be maintained as set out above. The person (employee of SMIT ADVISEURS CC) who obtained the information is responsible to ensure the appropriate completion of the applicable Questionnaire.

12.3.4.3. Responsibility to inform employees

The members of the Close Corporation assisted by the compliance function will be responsible to inform all employees of the record keeping requirements as well as their responsibility to maintain these records as it pertains to Smit Adviseurs CC clients.

12.3.4.4. Electronic format and Third-Party Recordkeeping

Smit Adviseurs CC will maintain all records in the following electronic format which can be reproduced in legible format: On the client folder under Vmware 1,2,3 and in hard copy, all server data is readily available by Smit Adviseurs CC.

The records:

- Are freely and easily accessible to Smit Adviseurs CC upon request;
- Are readily available to the Centre and relevant supervisory body when required;
- Are capable of being reproduced in a legible format

12.3.4.5. Admissibility of Records

Smit Adviseurs CC acknowledges that a record kept, or a certified extract of such a record, or a certified printout of any extract from an electronic record, is on its mere production in a matter before a court admissible as evidence of any fact contained in it of which direct oral evidence would be admissible.

12.3.4.6. Recordkeeping Responsibility

Although it is the primary responsibility of Smit Adviseurs CC to maintain records, it is the responsibility of every Representative of Smit Adviseurs CC to obtain all the necessary information at the time of the transaction and keep these records safe. No record may be destroyed by a person before the expiry of the five-year period referred to.

13. DUTY TO REPORT

In terms of the requirements set out in the FIC Act (as amended), Smit Adviseurs CC will ensure that it will provide the Financial Intelligence Centre with reports in the event of:

- Any cash transactions above the prescribed limit;
- A suspicious and unusual transaction; or
- Property associated with terrorist and related activities and financial sanctions pursuant to resolutions of the United Nations Security Council;
- Electronic transfers of money to or from the Republic; and
- Conveyance of cash to or from the Republic.

13.1. Reporting of Cash Transactions above the Prescribed Limit

Smit Adviseurs CC will ensure compliance with section 28 of the FIC Act (as amended) by reporting cash transactions above the prescribed threshold. This is also known as the Cash Threshold Reporting Obligation or CTR. Smit Adviseurs CC acknowledges that his reporting provides the Centre with a mechanism to proactively monitor and report on cash transactions which may be linked to money laundering activities so that potential proceeds of crime are timeously identified and investigated.

13.1.1. Who must Report?

The obligation to report applies to accountable institutions and reporting institutions. Smit Adviseurs CC is an accountable institution and is therefore obliged to report in terms of Section 28.

13.1.2. When does the Reporting Obligation Arise?

Smit Adviseurs CC acknowledges that the obligation to report arises when CASH more than the prescribed amount of R24,999 is being PAID or RECEIVED by Smit Adviseurs CC.

Smit Adviseurs CC will file the CTR Report with the Centre when it obtains knowledge that the transaction exceeds the prescribed amount. This knowledge can either be acquired when the institution physically receives/pays cash exceeding this amount or peruses its bank statement or a bank deposit slip from the client reflecting a transaction that exceeds this amount.

Any Key Individual, Representative or other employee of Smit Adviseurs CC that acquires this knowledge, will report this transaction to JACOBUS SMIT & MARIETTE VD WESTHUIZEN or the members of the Close Corporation before the end of business that day. JACOBUS SMIT & MARIETTE VD WESTHUIZEN must be provided with all the necessary information to report to the Centre within the prescribed time and manner.

Smit Adviseurs CC will ensure that the obligation to report is done irrespective of whether it is a suspicious and/or unusual transaction.

13.1.3. What is the Prescribed Amount?

Smit Adviseurs CC acknowledges that the prescribed limit is R24 999.99 or the equivalent foreign denomination value calculated at the time of the transaction OR an aggregate of smaller amounts which combine to this amount. Therefore, Smit Adviseurs CC will ensure that all cash transactions of R25 000 or more will be reported to the Centre.

13.1.4. What are Aggregate Amounts?

Smit Adviseurs CC will also report aggregates of smaller amounts which when combined add up to the prescribed amount, where it appears that these transactions are linked and that they should be considered as one transaction.

13.1.4.1. A period of at least 24 hours applies when considering aggregation.

Smit Adviseurs CC acknowledges that an aggregate transaction would also give rise to an obligation to report in terms of Section 29 of the FIC Act (as amended) as well. While acknowledging the contents contained in section 29 (Suspicious and unusual transaction), Smit Adviseurs CC will ensure that it will report a suspicion of a transaction or series thereof to avoid giving rise to another reporting duty.

13.1.4.2. Indications of aggregation:

The following are indications of aggregation:

- The period in which these transactions takes place;

- The fact that these transactions consist of a repetition of the same type of transaction;
- The smaller amounts involve the same person or account holder.

13.1.5. What is “Cash”?

Smit Adviseurs CC acknowledges that cash is coin and paper money AND travelers' cheques but does not include negotiable instruments.

Smit Adviseurs CC will ensure that physical cash paid out by Smit Adviseurs CC to a client or received by Smit Adviseurs CC will be covered by this obligation and must be reported.

Smit Adviseurs CC acknowledges that cash DOES NOT include a transfer of funds by means of a bank cheque, bank draft, electronic funds transfer, wire transfer or other written order that does not involve the physical transfer of cash. These methods of transferring funds are not covered by the cash threshold reporting obligation.

Smit Adviseurs CC acknowledges that where cash is received by an institution into or from an account held in the name of the accountable institution, there is a duty on Smit Adviseurs CC as well as the other institution to report such transaction. Smit Adviseurs CC acknowledges that more than one institution can therefore report in connection with the same transaction.

13.1.6. What is the time period for Reporting?

Smit Adviseurs CC acknowledges that a report must be sent as soon as possible, but no later than **2 days** after the person has become aware of the cash transaction or series of cash transactions that exceeded the prescribed amount.

Smit Adviseurs CC acknowledges that failing to report within the prescribed time period is an offence and/or is regarded as being non-compliant and is subject to an administrative sanction.

13.1.7. Method of Reporting

In terms of regulation 22(1) of the Regulations, Smit Adviseurs CC acknowledges that a CTR must be filed with the Centre electronically by making use of the internet-based reporting portal provided at <http://www.fic.gov.za> .

Smit Adviseurs CC shall ensure that it acquires login credentials so that it will be able to file CTRs electronically with the Centre in accordance with the requirements of regulation 22(1). Secure login credentials can be obtained via the Centre's website at www.fic.gov.za .

Smit Adviseurs CC will ensure that as much information as possible is included in the report as this will enable the Centre to take action immediately and assess whether to instruct the reporter not to proceed with the transaction.

13.2. Reporting Property associated with Terrorist and Related activities and financial sanctions pursuant to Resolutions of the United Nations Security Council.

Smit Adviseurs CC acknowledges that a report under Section 28A of the FIC Act (as amended) must be sent to FIC as soon as possible but not later than five (5) days after a

natural person who is Smit Adviseurs CC, or is in charge of, manages or is employed by Smit Adviseurs CC, has established that the client has property associated with terrorist and related activities in its possession or under its control.

Smit Adviseurs CC is aware of the publication of a proclamation by the President under section 25 of the Protection of Constitutional Democracy against Terrorist and Related Activities Act, 2004 or notice being given by the Director in terms of section 26(A)(3) and will ensure that Smit Adviseurs CC scrutinizes its information concerning clients with whom it has business relationships to determine whether any client is mentioned in the proclamation by the President or notice by the Director.

Smit Adviseurs CC will ensure that when reporting property associated with terrorist and related activities under S28A of the FIC Act (as amended), that the report contains full particulars in respect of it making the report:

- the name of the accountable institution;
- the identifying particulars of the accountable institution, e.g. registration number;
- the address of the accountable institution;
- the type of business of the accountable institution;
- the surname and initials of a contact person; and
- the contact particulars of a contact person.

13.3. Reporting of Suspicious and Unusual Transactions

Smit Adviseurs CC acknowledges that section 29 of the FIC Act (as amended) provides for the reporting of suspicious and unusual transactions (STR). Smit Adviseurs CC acknowledges that the reporting of suspicious and unusual transactions is regarded as an essential element of the anti-money laundering programme of every country.

13.3.1. Who must Report?

The duty to report is imposed on a person who carries on or oversees a business, a person who manages a business or a person who is an employee of a business whether they deal specifically with clients or not. Smit Adviseurs CC has imposed the duty to report on the following classes of persons with our business:

All managers, representatives and administrative staff.

13.3.2. When does the Reporting Obligation arise?

Smit Adviseurs CC acknowledges that its obligation to report arises when a person knows or ought reasonably to have known or suspected that certain facts exist. These facts can relate to situations concerning the business itself or transactions to which the business is a party.

Situations relating to the business can be that, Smit Adviseurs CC:

- Has received, or is about to receive, the proceeds of unlawful activities OR property which is connected to an offence relating to the financing of terrorist activities;

- Has been used, or is about to be used, in some way for money laundering purposes; OR to facilitate an offence relating to the financing of terrorist activities.

Situations relating to transactions to which Smit Adviseurs CC is a party and a person is aware or suspects that a transaction or series of transactions with the business:

- Facilitated, or is likely to facilitate the transfer of proceeds of unlawful activity OR property which is connected to an offence relating to the financing of terrorist activities;
- Does not appear to have a business or lawful purpose;
- Is conducted for the purpose of avoidance giving rise to a reporting duty under the FIC Act (as amended);
- May be relevant to the investigation of the evasion of any tax administered by the South African Revenue Service; or
- Somehow relates to an offence relating to the financing of terrorist activities.

13.3.3. Unlawful Activity

Smit Adviseurs CC acknowledges that the definition of “unlawful activity” is any conduct, which constitutes a crime or contravention of a law, within the Republic or elsewhere. One does not report the suspected crime of unlawful conduct, but the proceeds of such.

13.3.4. What constitutes a Suspicion?

A suspicion implies an absence of proof that a fact exists. Smit Adviseurs CC will consider all the circumstances as well as the normal business practices involved. Smit Adviseurs CC acknowledges that a suspicious situation may involve several individual factors that on their own seem insignificant, but taken together, they may raise a suspicion. Smit Adviseurs CC will evaluate the transaction in relation to what seems appropriate as well as one’s knowledge about the client. This can include his/her financial history, background and behaviour.

Smit Adviseurs CC acknowledges that any person who reasonably ought to have known or suspected that any of the facts referred to in section 29 exists, and who negligently fails to report the prescribed information in respect of a suspicious or unusual transaction or series of transactions or enquiry, is guilty of an offence and on conviction liable to imprisonment not exceeding 15 years or a fine not exceeding R100 Million.

Smit Adviseurs CC is aware that there are indicators of suspicious behaviour but that they should not be viewed in isolation and should always be considered in conjunction with other circumstances pertaining to a particular transaction. See Annexure J for a list of indicators of suspicious transactions.

13.3.5. Suspicious Transaction Threshold

Smit Adviseurs CC acknowledges that there is no monetary threshold that applies to this reporting obligation. Once the conclusion is reached that a suspicious or unusual situation exists, the transaction must be reported.

13.3.6. Can an Institution continue with a transaction after a Report has been made?

Smit Adviseurs CC acknowledges that a reporter may continue with and carry out a transaction unless the Centre directs him not to proceed with the transaction.

13.3.7. What is the Time Period for Reporting?

Smit Adviseurs CC acknowledges that a report must be sent as soon as possible, but not longer than 15 days (excluding Saturdays, Sundays and Public Holidays) after the person has become aware of the facts which give rise to a suspicion. If Smit Adviseurs CC fails to send a report under section 29 of the FIC Act (as amended) to the Centre within the period referred is guilty of an offence, and on conviction liable for imprisonment not exceeding 15 years or a fine not exceeding R100 million.

13.3.8. Method of Reporting

A report must be made by means of internet-based reporting provided by the Centre at: <http://www.fic.gov.za>. This report may NOT be posted. If you are not a registered user of the website, you do not have to register a report. It is important that as much information as possible be included in the report, as this will enable the Centre to take action immediately and assess whether to instruct the reporter not to proceed with the transaction.

13.3.9. Responsibility of Management

JACOBUS SMIT & MARIETTE VD WESTHUIZEN will be responsible to inform all employees of Smit Adviseurs CC of their duty to report suspicious or unusual transactions.

A person, who suspects that a suspicious or unusual situation exists, will report this immediately to the members of the Close Corporation assisted by the compliance function who will follow the required steps to report this transaction within the prescribed time limit. All necessary information to complete the report must be provided.

13.4. Confidentiality and Privilege

Smit Adviseurs CC acknowledges that no duty of secrecy or confidentiality or any other restriction on the disclosure of information, whether imposed by legislation or arising from the common law or agreement, affects Smit Adviseurs CC responsibility to comply with its reporting obligations and file a report.

13.5. Legal protection for the Reporter

Smit Adviseurs CC acknowledges that no legal action, whether criminal or civil, can be instituted against a person who complies in good faith with a reporting obligation.

Smit Adviseurs CC is aware that the identity of the reporter is also protected. This person cannot be forced to give evidence in criminal proceedings concerning such a report. A person may choose to do so voluntarily, but if he elects not to testify, no evidence regarding his identity is admissible as evidence in criminal proceedings.

13.5.1. Tipping-off

The person involved may not inform anyone, including the client or any other person associated with a reported transaction, of the contents of a suspicious transaction report or even the fact that such a report has been made.

The FIC Act (as amended) prohibits the reporter as well as any other person who knows or suspects that a report has been made, from disclosing information regarding that report, except where required by law.

Contravening these prohibitions constitutes offences that carry maximum penalties of imprisonment for a period up to 15 years or a fine up to R10 million.

13.6. Duty to provide Additional Information

The Centre may request the reporter to furnish the Centre with such additional information concerning the report and the grounds for the report as the Centre may reasonably require for the performance of its functions. When an institution or a person receives such a request, they must furnish the Centre without delay with such additional information as they may have available.

Failure to comply with a request is an offence, and on conviction one is liable for imprisonment not exceeding 15 years or a fine not exceeding R100 Million.

13.7. Conveyance of Cash to or from Republic

A person who intends conveying or who has conveyed or who is conveying an amount of cash or a bearer negotiable instrument in excess of the prescribed amount to or from the Republic must, on demand, report the prescribed particulars concerning that conveyance to a person authorised by the Minister for this purpose. This person must without delay send a copy of the report to the Centre.

Smit Adviseurs CC acknowledges that any person, who willfully fails to submit a report, is guilty of an offence and conviction liable for imprisonment not exceeding 15 years and a fine not exceeding R100 Million. Failure to send the report is a conviction liable for imprisonment not exceeding 5 years and a fine not exceeding R10 Million.

13.8. Electronic Transfers of Money to or from Republic

If Smit Adviseurs CC, through electronic transfer, sends money in excess of a prescribed amount out of the Republic or receives money in excess of a prescribed amount from outside the Republic on behalf, or on the instruction of another person, it will, within the prescribed period after the money was transferred, report the transfer, together with the prescribed particulars concerning the transfer, to the Centre.

Smit Adviseurs CC acknowledges that if it fails to report to the Centre the prescribed information, it is guilty of an offence and/or is regarded as being non-compliant and is subject to an administrative sanction.

13.9. Obligation to Advise the Centre of Clients

Smit Adviseurs CC acknowledges that if an authorized representative of the Centre requests Smit Adviseurs CC, a reporting institution or any person that is required to make a report in terms of section 29 of the FIC Act (as amended), to advise whether a specific person is or has been a client of that institution, or if the specific person acted on behalf of a client of the Smit Adviseurs CC or if a client of the accountable institution is acting or had acted for a specific person, or whether a number specified by the Centre was allocated by the institution or person to another person with whom the institution has or had a business relationship, or on the type and status of a business relationship with a client of the institution or person, Smit Adviseurs CC will inform the Centre accordingly.

Smit Adviseurs CC acknowledges that the failure to inform the Centre is an offence, and on conviction one is liable to imprisonment not exceeding 15 years or a fine not exceeding R100 Million.

Smit Adviseurs CC acknowledges that authorized representatives of the Centre may have access during ordinary working hours to any records kept by or on behalf of an Smit Adviseurs CC and may examine, make extracts from or copies of any such records for the purpose of obtaining further information in respect of a report made or ought to be made in terms of section 28, 28A, 29, 30(1) or 31 of the FIC Act (as amended). This access is subject to the authorised representative obtaining a warrant, except in the case of records which the public is entitled to have access to. Smit Adviseurs CC will provide all reasonable assistance to the authorised representative to access records.

14. DUTY TO TRAIN EMPLOYEES

Smit Adviseurs CC will provide ongoing training to all its employees to enable them to comply with the provisions of the FIC Act (as amended) and the RMCP applicable to them.

14.1. Who must receive Training?

Smit Adviseurs CC will ensure that every new employee receives training within 30 days after their appointment, and subsequently complete the Online FICA Course available on Masthead's website.

All other employees must receive refresher FICA Training on an annual basis by completing the Online FICA Course on Masthead's website.

The training register of the employees must be updated with the training they receive from Smit Adviseurs CC.

14.2. Who must provide the Training?

JACOBUS SMIT & MARIETTE VD WESTHUIZEN, is responsible for the training of the employees as well as updating of the training register. JACOBUS SMIT & MARIETTE VD WESTHUIZEN must report on an annual basis to JACOBUS SMIT & MARIETTE VD WESTHUIZEN regarding the training provided to all employees.

Failure to provide ongoing training is regarded as being non-compliant and is subject to an administrative sanction.

Annexure A - Risk Indicators

RISK FACTOR	RISK	COMMENT	
1	GEOGRAPHICAL		
1.1	Location of the Business and its Office		
1.1.1	Head Office – Tzaneen	Low	
1.1.2	Branches – Tzaneen x 7	Low	
1.1.3	Branches - Polokwane	Low	
1.1.4	Branches – Louis Trichardt	Low	
1.1.5	Branches - Sekunda	Low	
1.2	Geographical Location of Clients		
1.2.1	Client residing in South Africa and is a South African National	Low	
1.2.2	South African juristic or legal person operating in South Africa only	Low	
1.2.3	Foreign National residing in South Africa	Medium	
1.2.4	Any person residing and working in a foreign jurisdiction which has NOT been identified as 'high risk' by the FATF	Medium	
1.2.5	Any person residing and working in a foreign jurisdiction which has been identified as 'high risk' by the FATF	High	
1.2.6	Any person residing more than 100km from the SMIT ADVISEURS CC's office	Medium	
2	PRODUCTS AND SERVICES		
2.1	Any long-term insurance policy, which is a fund policy or a fund member policy, and in respect of which the policyholder is a pension fund, provident fund or retirement annuity fund.	Low	Guidance has been taken from the 'old' FIC Act.
2.2	Any unit trust or linked product investment effected by a pension fund, provident fund or retirement annuity fund.	Low	Guidance has been taken from the 'old' FIC Act.
2.3	Any annuity purchased as a compulsory annuity in terms of the rules of a pension fund, provident fund or retirement annuity.	Low	Guidance has been taken from the 'old' FIC Act.
2.4	Any reinsurance policy issued to another accountable institution.	Low	Guidance has been taken from the 'old' FIC Act.
2.5	Any long-term insurance policy classified as an assistance policy.	Low	Guidance has been taken from the 'old' FIC Act.
2.6	Any long-term insurance policy which provides benefits only upon the death, disability, sickness or injury of the life insured under the policy.	Low	Guidance has been taken from the 'old' FIC Act.
2.7	Short-term insurance policies	Low	Guidance has been taken from the 'old' FIC Act.
2.8	Medical Aid products	Low	Guidance has been taken from the 'old' FIC Act.
2.9	Any products and services which do not fall under the low or high-risk category.	Medium	
2.10	Forex	High	
2.11	Virtual or cryptocurrencies	High	
3	TRANSACTION SIZE		
3.1	Less than R1 million	Low	
3.2	Between R1 million and R10 million	Medium	
3.3	More than R10 million	High	
4	CLIENT AFFORDABILITY OR FINANCIAL MEANS		
4.1	Transaction size falls within the customer's means	Low	
4.2	Transaction does not fall within the financial means of the customer; however, the source of funds can clearly be traced, e.g. an inheritance or pension money.	Medium	
4.3	Transaction size falls outside of customer's means	High	
5	CUSTOMER RISKS		
5.1	Customer Type		
5.1.1	Natural person (excluding a person that is a DPIP or FPPO)	Low	
5.1.2	Simple juristic or legal person where the beneficial owner(s) is not a DPIP or FPPO.	Low	
5.1.3	Any customer that does not fall into the low or high-risk category	Medium	

RISK FACTOR	RISK	COMMENT
5.1.4	Complex juristic or legal person	High
5.1.5	Any juristic or legal person where the beneficial owner(s) is a DPIP or FPPO	High
5.2	Customer Activities	
5.2.1	Natural person who earns a salary	Low
5.2.2	Non-cash business that only concludes transactions in ZAR	Low
5.2.3	Any activities that do not fall into the low or high-risk category	Medium
5.2.4	Cash business	High
5.2.5	Non-cash business that concludes transactions in foreign currency	High
5.3	Customer Co-operation and Behaviour	
5.3.1	Client has co-operated with all requests and willingly provided all required information and documentation.	Low
5.3.2	Client has co-operated with the requests for information but there have been delays in providing the required information and documentation.	Medium
5.3.3	The display of any suspicious behaviour or indicator of unusual business (refer to Annexure J)	High
5.4	Customer Interaction	
5.5	Frequent face-to-face interaction with the client	Low
5.6	Any client interaction that does not fall into the low or high-risk category	Medium
5.7	No face-to-face interaction with client. All business is conducted via telephone, internet, email etc.	High

Annexure B – Onboarding Questionnaire (Natural Persons)

1. NEW OR EXISTING CLIENT

New Business Relationship Existing Client

2. CLIENT DETAILS (establish the identity of the client)

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

3. NATURE OF THE BUSINESS RELATIONSHIP (understand the client and explain the purpose and nature of the business relationship with the client)

Client's occupation: _____
Source of Income: _____
Source of Wealth: _____
Services to be provided to the client: _____
Anticipated frequency of transactions
e.g. once-off, annually, ad-hoc etc.: _____
Expected size of transactions: _____
Type of financial products e.g. retirement
annuity, endowment, shares etc.: _____
Provide further details below:

4. CLIENT SCREENING

Does the client's name appear on the UN Green or Black list? Yes No

(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

5. FOREIGN PROMINENT PUBLIC OFFICIAL (FPPO)

(Complete the questionnaire for Foreign Prominent Public Officials)

Is the client a FPPO? Yes No

(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

6. DOMESTIC PROMINENT INFLUENTIAL PERSONS (DPIP)

(Complete the questionnaire for Domestic Prominent Influential Persons)

Is the client a DPIP? Yes No

7. CLIENT RISK PROFILE

	RATE		
Interaction with client (e.g. face-to-face)	1	2	3
Client co-operation and behaviour	1	2	3
Transaction within the client's financial means	1	2	3
Size of transaction	1	2	3
Product selection	1	2	3
Client's geographical location	1	2	3
Client type (e.g. foreign national, SA citizen)	1	2	3
Client activities/occupation (source of income/wealth)	1	2	3
TOTAL	<input type="text"/>		
LOW RISK	0 - 8		
MEDIUM RISK	9 - 16		
HIGH RISK	17+		

8. ACCEPTANCE AND SIGN-OFF PROCESS

Accept Decline

Reason client was accepted or declined:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full name: _____

Signature: _____

Date: _____

FICA COMPLIANCE OFFICER or SENIOR MANAGEMENT (FOR ALL HIGH-RISK CLIENTS)

Full name: _____

Signature: _____

Date: _____

Annexure C – Onboarding Questionnaire (Legal Person)

1. NEW OR EXISTING CLIENT

New Business Relationship Existing Client

2. ENTITY DETAILS (establish the identity of the client)

Registered Name: _____
Trading Name: _____
Type of entity: _____
Registration No.: _____
VAT No.: _____
Physical Address: _____
Postal Address: _____
Head Office Address: _____
Telephone No.: _____
Website: _____

3. RESOLUTION (documentation authorising a person to act for the client)

Yes No

4. AUTHORISED SIGNATORY(IES) (establish the identity of the persons authorised to act on behalf of the entity)

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

5. OWNERSHIP / MANAGEMENT STRUCTURE OF THE ENTITY

Provide details of the ownership and management structure of the entity:

6. BENEFICIAL OWNER DETAILS (establish the identity of the beneficial owners)

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____

Passport No. (if foreign national): _____
 Residential Address: _____
 Postal Address: _____
 Telephone No.: _____
 Mobile No.: _____
 Email Address: _____

7. NATURE OF THE BUSINESS

Provide details about the business, its purposes, what it does etc.:

8. NATURE OF THE BUSINESS RELATIONSHIP (understand the client and explain the purpose and nature of the business relationship with the client)

Source of Income: _____
 Source of Wealth: _____
 Services to be provided to the client: _____
 Anticipated frequency of transactions
 e.g. once-off, annually, ad-hoc etc.: _____
 Expected size of transactions: _____
 Type of financial products e.g. retirement
 annuity, endowment, shares etc.: _____
 Provide further details below:

9. SCREENING

Does the client's name appear on the UN Green or Black list? Yes No

(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

10. ADDITIONAL INFORMATION

Is the entity based outside of South Africa?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Is the entity based in a high-risk jurisdiction or have links to a sanctioned country?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Does the entity have any links to criminality?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

11. FOREIGN PROMINENT PUBLIC OFFICIAL (FPPO)

(Complete the questionnaire for Foreign Prominent Public Officials)

Are any of the beneficial owners FPPO's?

Yes No

(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

12. DOMESTIC PROMINENT INFLUENTIAL PERSONS (DPIP)

(Complete the questionnaire for Domestic Prominent Influential Persons)

Are any of the beneficial owners DPIP's?

Yes No

13. CLIENT RISK PROFILE

Interaction with client (e.g. face-to-face)
 Client co-operation and behaviour
 Transaction within the client's financial means
 Size of transaction
 Product selection
 Client's geographical location
 Client type (e.g. foreign national, SA citizen)
 Client activities/occupation (source of income/wealth)

RATE

1	2	3
1	2	3
1	2	3
1	2	3
1	2	3
1	2	3
1	2	3
1	2	3

TOTAL

LOW RISK

0 - 8

MEDIUM RISK

9 - 16

HIGH RISK

17+

14. ACCEPTANCE AND SIGN-OFF PROCESS

Accept Decline

Reason client was accepted or declined:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full name: _____
 Signature: _____
 Date: _____

FICA COMPLIANCE OFFICER (FOR ALL HIGH-RISK CLIENTS)

Full name: _____
 Signature: _____
 Date: _____

Annexure D – Onboarding Questionnaire (Trust)

1. NEW OR EXISTING TRUST

New Business Relationship

Existing Client

2. TRUST DETAILS (establish the identity of the client)

Trust Name: _____
Trust No. _____
Master's Office: _____
Jurisdiction of Trust: _____
Type of Trust: _____
VAT No.: _____
Physical Address: _____
Postal Address: _____
Telephone No.: _____

4. TRUSTEES (complete for every Trustee)

TRUSTEE 1

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

TRUSTEE 2

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

5. RESOLUTION (documentation authorising a person to act for the Trust)

Yes

No

6. AUTHORISED SIGNATORY(IES) (establish the identity of the persons authorised to act on behalf of the Trust)

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

7. FOUNDER

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

8. BENEFICIARIES (complete for each beneficiary)

BENEFICIARY 1

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

BENEFICIARY 2

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

9. NATURE OR PURPOSE OF THE TRUST (why was the Trust established)

Provide details about the Trust, its purposes, etc.:

10. NATURE OF THE BUSINESS RELATIONSHIP (understand the client and explain the purpose and nature of the business relationship with the client)

Source of Income: _____

Source of Wealth: _____

Services to be provided to the client: _____

Anticipated frequency of transactions
e.g. once-off, annually, ad-hoc etc.: _____

Expected size of transactions: _____

Type of financial products e.g. retirement
annuity, endowment, shares etc.: _____

Provide further details below:

11. SCREENING

Does the client's name appear on the UN Green or Black list? Yes No

(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

12. FOREIGN PROMINENT PUBLIC OFFICIAL (FPPO)

(Complete the questionnaire for Foreign Prominent Public Officials)

Are any of the parties to the Trust FPPO's? Yes No

(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

13. DOMESTIC PROMINENT INFLUENTIAL PERSONS (DPIP)

(Complete the questionnaire for Domestic Prominent Influential Persons)

Are any of the parties to the Trust, DPIP's? Yes No

14. CLIENT RISK PROFILE

	RATE			
Interaction with client (e.g. face-to-face)	1	2	3	
Client co-operation and behaviour	1	2	3	
Transaction within the client's financial means	1	2	3	
Size of transaction	1	2	3	
Product selection	1	2	3	
Client's geographical location	1	2	3	
Client type (e.g. foreign national, SA citizen)	1	2	3	
Client activities/occupation (source of income/wealth)	1	2	3	
TOTAL	<table border="1" style="width: 100%; height: 20px;"> <tr> <td></td> </tr> </table>			
LOW RISK	<table border="1" style="width: 100%; height: 20px;"> <tr> <td style="text-align: center;">0 - 8</td> </tr> </table>			0 - 8
0 - 8				
MEDIUM RISK	<table border="1" style="width: 100%; height: 20px;"> <tr> <td style="text-align: center;">9 - 16</td> </tr> </table>			9 - 16
9 - 16				
HIGH RISK	<table border="1" style="width: 100%; height: 20px;"> <tr> <td style="text-align: center;">17+</td> </tr> </table>			17+
17+				

15. ACCEPTANCE AND SIGN-OFF PROCESS

Accept
 Decline

Reason client was accepted or declined:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full name: _____

Signature: _____

Date: _____

FICA COMPLIANCE OFFICER or SENIOR MANAGEMENT (FOR ALL HIGH-RISK CLIENTS)

Full name: _____

Signature: _____

Date: _____

Annexure E – Onboarding Questionnaire (Partnership)

1. NEW OR EXISTING PARTNERSHIP

New Business Relationship Existing Client

2. PARTNERSHIP DETAILS (establish the identity of the client)

Partnership Name: _____
Type of Partnership: _____
No. of Partners: _____
Physical Address: _____
Postal Address: _____
Telephone No.: _____
Website: _____
Email Address: _____

3. PARTNERS (complete for every Partner)

PARTNER 1

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

PARTNER 2

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

4. RESOLUTION (documentation authorising a person to act for the Partnership)

Yes No

5. AUTHORISED SIGNATORY(IES) (establish the identity of the persons authorised to act on behalf of the Partnership)

Full Names: _____
Date of Birth: _____
Identity No.: _____
Citizenship: _____
Passport No. (if foreign national): _____
Residential Address: _____
Postal Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

6. NATURE OR PURPOSE OF THE PARTNERSHIP (why was the Partnership established, what is the nature of the business)

Provide details about the Partnership, its purposes, what it does etc.:

7. NATURE OF THE BUSINESS RELATIONSHIP (understand the client and explain the purpose and nature of the business relationship with the client)

Source of Income: _____
Source of Wealth: _____
Services to be provided to the client: _____
Anticipated frequency of transactions
e.g. once-off, annually, ad-hoc etc.: _____
Expected size of transactions: _____
Type of financial products e.g. retirement
annuity, endowment, shares etc.: _____
Provide further details below:

8. SCREENING

Does the client's name appear on the UN Green or Black list? Yes No
(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

9. FOREIGN PROMINENT PUBLIC OFFICIAL (FPPO)
(Complete the questionnaire for Foreign Prominent Public Officials)

Are any of the Partners FPPO's?

Yes No

(NB: If the answer to this question is YES, immediately refer this matter to the FICA Compliance Officer)

10. DOMESTIC PROMINENT INFLUENTIAL PERSONS (DPIP)

(Complete the questionnaire for Domestic Prominent Influential Persons)

Are any of the Partners DPIP's?

Yes No

11. CLIENT RISK PROFILE

Interaction with client (e.g. face-to-face)
 Client co-operation and behaviour
 Transaction within the client's financial means
 Size of transaction
 Product selection
 Client's geographical location
 Client type (e.g. foreign national, SA citizen)
 Client activities/occupation (source of income/wealth)

RATE

1	2	3
1	2	3
1	2	3
1	2	3
1	2	3
1	2	3
1	2	3
1	2	3

TOTAL

LOW RISK

0 - 8

MEDIUM RISK

9 - 16

HIGH RISK

17+

12. ACCEPTANCE AND SIGN-OFF PROCESS

Accept Decline

Reason client was accepted or declined:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full name: _____
 Signature: _____
 Date: _____

FICA COMPLIANCE OFFICER or SENIOR MANAGEMENT (FOR ALL HIGH-RISK CLIENTS)

Full name: _____
 Signature: _____
 Date: _____

Annexure F - Transactional Due Diligence Questionnaire

1. CLIENT DETAILS

Full Names / Registration Name: _____
Identity/Passport/Registration/Trust/Other No.: _____
Address: _____
Telephone No.: _____
Mobile No.: _____
Email Address: _____

PLEASE ENSURE THAT YOU HAVE THE CLIENT'S INITIAL TAKE-ON QUESTIONNAIRE WITH YOU WHEN COMPLETING THIS QUESTIONNAIRE.

2. REVIEW QUESTIONS

How many months have passed since the initial Client Take-On Questionnaire was completed?

(If longer than 36 months, please complete a new Client Take-on Questionnaire.)

Has any information changed since the initial Client Take-On Questionnaire was completed? Yes No

(If YES, please complete a new Client Take-on Questionnaire.)

When was the last business transaction concluded?

Is the frequency of transactions consistent with your knowledge of the client? Yes No

(If NO, please complete a new Client Take-on Questionnaire.)

Is the size of the transaction consistent with your knowledge of the client? Yes No

(If NO, please complete a new Client Take-on Questionnaire.)

Is the transaction complex, unusual or unusually large or without any apparent business or lawful purposes? Yes No

(If YES, please complete a new Client Take-on Questionnaire and refer to the FICA Compliance Officer or Senior Manager.)

Are there any behavioural risk indicators present? Yes No

(If YES, please complete a new Client Take-on Questionnaire.)

Has there been any material change in the way in which you interact with your client, e.g. instruction channeled through a third-party or non-face-to-face vs face-to-face etc.? Yes No

(If YES, please complete a new Client Take-on Questionnaire.)

Since the last interaction, has there been any change to the client's status as an FPPO or DPIIP? Yes No

(If YES, please complete a new Client Take-on Questionnaire.)

3. SIGN-OFF PROCESS

Provide additional details / reasons for proceeding with the transaction:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full name: _____
Signature: _____
Date: _____

FICA COMPLIANCE OFFICER or SENIOR MANAGEMENT (FOR ALL HIGH-RISK CLIENTS)

Full name: _____
Signature: _____
Date: _____

Annexure G – Ongoing Due Diligence Questionnaire

1. CLIENT DETAILS

Full Names / Registration Name: _____
 Identity/Passport/Registration/Trust/Other No.: _____
 Address: _____
 Telephone No.: _____
 Mobile No.: _____
 Email Address: _____

2. ONGOING DUE DILIGENCE

What was your client's risk profile? Low Medium High

When was the last Ongoing Due Diligence Questionnaire completed?

12 Months 24 Months 36 Months > 36 Months

(If longer than 36 months, please complete a new Client Take-on Questionnaire.)

Was the time-frame for completing the Ongoing DD consistent with your RMCP and the client's risk profile? Yes No

If NO, please provide reasons:

(Complete a new Client Take-On Questionnaire)

Have you verified the client's information against the information on record? Yes No

(If NO, please do so before continuing with this Questionnaire.)

Has any of the client's circumstances or information changed since the last Questionnaire? Yes No

(If YES, please complete a new Client Take-on Questionnaire.)

Has the client completed more than 1 transaction during the business relationship? Yes No

If YES, were the transactions conducted consistent with your knowledge of the client, the client's business, etc.? Yes No

If NO, were any transactions complex, unusual or unusually large or without any apparent business or lawful purposes? Yes No

(If YES, please complete a new Client Take-on Questionnaire)

If YES, were the source of funds / income easily identifiable and traceable? Yes No

If NO, are there grounds to report a suspicion of money laundering or terrorist financing? Yes No

(Immediately refer the matter to the FICA Compliance Officer)

3. SIGN-OFF PROCESS

Provide additional details / reasons for proceeding with the business relationship:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full name: _____
Signature: _____
Date: _____

FICA COMPLIANCE OFFICER or SENIOR MANAGEMENT (FOR ALL HIGH-RISK CLIENTS)

Full name: _____
Signature: _____
Date: _____

Annexure H – Domestic Prominent Influential Persons Questionnaire

Client Name: _____

Identity Number: _____

Representative: _____

Date: _____

Domestic prominent influential person		
	YES	NO
Does the client hold, including in an acting position for a period exceeding 6 months, or has held at any time in the last 12 months, in the Republic one of the following? (Inclusive of close family members or close associates)		
A prominent public function (including that of):		
The President or Deputy President		
A Government Minister or Deputy Minister		
The Premier of a Province		
A member of the Executive Council of a Province		
An executive mayor of a municipality elected in terms of the Local Government: Municipal Structures Act, 1998		
A leader of a political party registered in terms of the Electoral Commission Act, 1996		
A member of a royal family or senior traditional leader as defined in the Traditional Leadership and Governance Framework Act, 2003		
The head, accounting officer or chief financial officer of a national or provincial department or government component, as defined in section 1 of the Public Service Act, 1994		
The municipal manager of a municipality appointed in terms of section 54A of the Local Government: Municipal Systems Act, 2000, or a chief financial officer designated in terms of section 80(2) of the Municipal Finance Management Act, 2003		
The chairperson of the controlling body, the chief executive officer, or a natural person who is the accounting authority, the chief financial officer or the chief investment officer of a public entity listed in Schedule 2 or 3 to the Public Finance Management Act, 1999		
The chairperson of the controlling body, chief executive officer, chief financial officer or chief investment officer of a municipal entity as defined in section 1 of the Local Government: Municipal Systems Act, 2000		
A constitutional court judge or any other judge as defined in section 1 of the Judges' Remuneration and Conditions of Employment Act, 2001		
An ambassador or high commissioner or other senior representative of a foreign government based in the Republic; or		
An officer of the South African National Defence Force above the rank of major-general		
Any of the following positions of a company, as defined in Companies Act, 2008, if the company provides goods or services to an organ of state and the annual transactional value of the goods or services or both exceeds an amount determined by the Minister by notice in the Gazette:	YES	NO
Chairperson of the board of directors		
Chairperson of the audit committee		
Executive officer		
Chief financial officer		

Domestic prominent influential person

The position of head, or other executive directly accountable to that head, of an international organisation based in the Republic.

If this client is a Domestic Prominent Influential Person **AND** the client's Risk Profile is High Risk, then:

- 1) Obtain senior management authorisation;
- 2) Obtain additional information regarding source of funds/wealth, source of income, the transaction and the client;
- 3) Conduct enhanced ongoing monitoring of the business relationship.

Provide details of the client's Source of Funds/Wealth and Source of Income below:

Provide details of the transaction below:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full Names: _____

Signature: _____

Date: _____

SENIOR MANAGEMENT / FICA COMPLIANCE OFFICER

Additional comments:

Full Names: _____

Signature: _____

Date: _____

Annexure I – Foreign Prominent Public Officials Questionnaire

Client Name: _____

Identity Number: _____

Representative: _____

Date: _____

Foreign Prominent Public Official		
Is the client (currently or within the last 12 months) one of the following or a close family member or closely associated with one of the following:	YES	NO
Head of State, Head of Country or Government		
Member of a foreign royal family		
Government Minister or equivalent senior politician or leader of a political party		
Senior judicial officer		
Senior executive of a state-owned corporation		
High ranking member of the military		

If this client is a Domestic Prominent Influential Person **AND** the client's Risk Profile is High Risk, then:

- 1) Automatically rate the client as High Risk;
- 2) Obtain senior management approval;
- 3) Obtain additional information regarding source of funds/wealth, source of income, the transaction and the client;
- 4) Conduct enhanced ongoing monitoring of the business relationship.

Provide details of the client's Source of Funds/Wealth and Source of Income below:

Provide details of the transaction below:

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full Names: _____

Signature: _____

Date: _____

SENIOR MANAGEMENT / FICA COMPLIANCE OFFICER

Additional comments:

Has the client been approved?

Yes

No

Full Names: _____

Signature: _____

Date: _____

Annexure J – Indicators of Suspicious and Unusual Transactions

Indicators of Suspicious and Unusual Business:

- The client makes deposits of funds with a request for their immediate transfer elsewhere;
- Unwarranted and unexplained international transfers;
- The payment of commission or fees that appear excessive in relation to those normally payable;
- Lack of concern about high commissions, fees, penalties etc. incurred as a result of a particular type or method of transaction;
- Transactions do not appear to be in keeping with normal industry practices;
- Purchase of commodities at prices significantly above or below market prices;
- Unnecessarily complex transactions;
- Unwarranted involvement of structures such as trusts and corporate vehicles in transactions;
- A transaction seems to be unusually large or otherwise inconsistent with the customer's financial standing or usual pattern of activities;
- Buying or selling securities with no apparent concern for making profit or avoiding loss;
- Unwarranted desire to involve entities in foreign jurisdictions in transactions;
- A client attempts to convince employee not to complete any documentation required for the transaction;
- A client makes inquiries that would indicate a desire to avoid reporting;
- A client has unusual knowledge of the law in relation to suspicious transaction reporting;
- A client seems very conversant with money laundering or terrorist activity financing issues;
- A client is quick to volunteer that funds are clean or not being laundered.

Indicators in terms of Client Identification:

- The use of seemingly false identity in connection with any transaction, including the use of aliases and a variety of similar but different addresses and, in particular, the opening or operating of a false name account;
- Opening accounts using false or fictitious documents;
- A client provides doubtful or vague identification information;
- A client refuses to produce personal identification documents;
- A client changes a transaction after learning that he must provide a form of identification;
- A client only submits copies of personal identification documents;

- A client wants to establish identity using something other than his or her personal identification documents;
- A client's supporting documentation lacks important details such as contact particulars;
- Client does not want correspondence sent to his/her home address.
- A client inordinately delays presenting corporate documents; or
- All identification presented by the client is foreign or cannot be checked for some reason.

General Indicators of Suspicious Behaviour:

- A client provides insufficient, vague or suspicious information concerning a transaction;
- Accounts that show unexpectedly large cash deposits and immediate withdrawals;
- A frequent exchange of small denomination notes for large denomination notes;
- Client appears to have accounts with several financial institutions without no apparent reason;
- Involvement of significant amounts of cash in circumstances that's difficult to explain.

Annexure K - Client Risk Rating

	RATE	
Interaction with client (e.g. face-to-face)		
Client co-operation and behaviour		
Transaction within the client's financial means		
Size of transaction		
Product selection		
Client's geographical location		
Client type (e.g. foreign national, SA citizen)		
Client activities/occupation (source of income/wealth)		
TOTAL		
LOW RISK	0 - 8	
MEDIUM RISK	9 - 16	
HIGH RISK	17+	

An alternative to the above method of calculating the client's risk rating is to default to the highest level of risk identified for each risk factor.

Provide additional information to explain how you have rated each risk factor relevant to the client:

Has a decision been taken to deviate from the Risk Rating calculated above? Yes No

If YES, provide details for this decision and obtain approval from the FICA Compliance Officer or Senior Management

EMPLOYEE WHO COMPLETED THE QUESTIONNAIRE

Full name: _____
 Signature: _____
 Date: _____

FICA COMPLIANCE OFFICER or SENIOR MANAGER (FOR ALL HIGH-RISK CLIENTS)

Full name: _____
 Signature: _____
 Date: _____

Annexure L – KYC Checklist for Natural persons (South African Citizens / Residents)

Information Required	Simplified	Standard	Enhanced
Full Names	Identity document	Identity document	Original Identity Document or certified copy (not older than 3 months)
Date of Birth	Identity document	Identity document	Original Identity Document or certified copy (not older than 3 months)
Identity Number	Identity document	Identity document	Original Identity Document or certified copy (not older than 3 months)
Residential Address	A utility or other account bearing the name of the natural person and reflecting the physical address where a service is being rendered.	<p>A utility or other account bearing the name of the natural person and reflecting the physical address where a service is being rendered.</p> <p>A recent lease/rental agreement;</p> <p>Mortgage statement from a bank;</p> <p>Municipal rates and taxes;</p> <p>Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>If none of these documents are available:</p> <p>A staff member may complete a certification of physical address report.</p> <p>The client can make a sworn affidavit regarding his/her physical address.</p> <p>Documentation MUST be less than 3 months' old.</p>	<p>A utility or other account bearing the name of the natural person and reflecting the physical address where a service is being rendered.</p> <p>A recent lease/rental agreement;</p> <p>Mortgage statement from a bank;</p> <p>Municipal rates and taxes;</p> <p>Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>Documentation MUST be less than 3 months' old.</p>
Income Tax Registration number	Not required	Any official SARS document reflecting the natural persons' name and income tax number.	Any official SARS document reflecting the natural persons' name and income tax number.
Other information that may be obtained to "Know Your Client" better	Not required	N/A	Biometric information, place of birth, family circumstances, place of employment or business, business address, contact details (including social media), contacts with authorities or other accountable institutions.

Annexure N – KYC Checklist for SA Legal Person (Close Corporations & Companies)

Information Required	Simplified	Standard	Enhanced
Registered name of the Company or Close Corporation	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)
Registration number under which the Company or CC is incorporated	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	Most recent version of the CM1 or CK1 or applicable CoR forms (Certificate of Incorporation)	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)
Name (Trading) under which Company or Close Corporation conducts business	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	An Account bearing the name of the Company or Close Corporation	An original or certified copy of an account bearing the name of the Company or Close Corporation
Registered address of the Company or Close Corporation	Most recent version of the CM22 or CK2 or applicable CoR Forms (Notice of Registered Office and Postal Address)	<p>Most recent version of the CM22 or CK2 or applicable CoR Forms (Notice of Registered Office and Postal Address) and one of the following (not required for Public Listed Companies):</p> <p>A utility or other account bearing the name of the Company or CC reflecting the physical address where a service is being rendered.</p> <p>A recent lease/rental agreement;</p> <p>Municipal rates and taxes; Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>Documentation must be less than 3 months' old.</p>	<p>Certified copy of the most recent version of the CM22 or CK2 or applicable CoR Forms (Notice of Registered Office and Postal Address) and a certified copy of one of the following (not required for Public Listed Companies):</p> <p>A utility or other account bearing the name of the Company or CC reflecting the physical address where a service is being rendered.</p> <p>A recent lease/rental agreement;</p> <p>Municipal rates and taxes; Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>Documentation must be less than 3 months' old.</p>
Address from which the Close Corporation or Company operates, or if it operates from multiple addresses the address of the office seeking to establish a business relationship or single transaction and the address of its head office.	Completed Questionnaire	<p>Any one of the following documents reflecting the client's name and residential address where the business operates from:</p> <p>A recent lease/rental agreement;</p> <p>Municipal rates and taxes; Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>Documentation must be less than 3 months' old.</p>	<p>An original or certified copy of any one of the following documents reflecting the client's name and residential address where the business operates from:</p> <p>A recent lease/rental agreement;</p> <p>Municipal rates and taxes; Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>Documentation must be less than 3 months' old.</p>
Income Tax and VAT Registration Number of the Close Corporation or Company.	Completed Questionnaire	Any official document reflecting client's income tax and VAT number.	A certified copy of an official document reflecting client's income tax and VAT number.

Information Required	Simplified	Standard	Enhanced
Beneficial Owner(s)	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	Original or certified copy of the most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)CIPC SearchOrganogram
<p>Obtain the following for: The manager of the close corporate or company Each natural person holding more than 25% of the shares/membership interest and/or voting rights Each natural person identified as the beneficial owner of the close corporation or company Each natural person authorised to act on behalf of the company (e.g. directors) or close corporation</p>			
Full Names:	Identity Document if SA Citizen or Passport if Foreign National	Identity Document if SA Citizen or Passport if Foreign National	Original or Certified copy of Identity Document if SA Citizen or Passport if Foreign National
Date of Birth:			
Identity No.:			
Passport No. (if foreign national):			
Citizenship:			
Country of Residence:			
Residential Address:	Do not need to verify address but provide if readily available.	<p>A utility or other account bearing the name of the natural person and reflecting the residential address.</p> <p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p> <p>Short-term Insurance Schedule reflecting the risk address</p> <p>If none of these documents are available:</p> <p>A staff member may complete a certification of physical address report</p> <p>The person can make a sworn affidavit regarding his/her physical address</p> <p>Documentation must be less than 3 months' old</p>	<p>An original or certified copy of a utility or other account bearing the name of the natural person and reflecting the residential address.</p> <p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p> <p>Short-term Insurance Schedule reflecting the risk address</p> <p>Documentation must be less than 3 months' old</p>
For each Natural Person who has been authorised to establish a business relationship or enter into a single transaction on behalf of the entity	Resolution or Mandate confirming such authorisation or appointment	Resolution or Mandate confirming such authorisation or appointment	Original or Certified copy of Resolution or Mandate confirming such authorisation or appointment
The nature of business	Relevant Questionnaire	Relevant Questionnaire	Relevant Questionnaire

Annexure O – KYC Checklist for a Legal Person (Foreign Companies)

Information Required	Simplified	Standard	Enhanced
Name and Number under which the company is incorporated	Official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address	Official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address	Original or certified copy of official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address
Name under which business is conducted in the country in which the company is incorporated or the name under which it conducts business in the Republic.	Official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address	Official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address	Original or certified copy of official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address
Address where the company is situated for purposes of its incorporation	Official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address	Official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address	Original or certified copy of official document issued by an Authority for recording the incorporation of companies of the country of origin, bearing its registered name, number and address
Address from which the Company operates, or if it operates from multiple addresses the address of the office seeking to establish a business relationship or single transaction and the address of its Head Office.	Completed Questionnaire	<p>Any one of the following documents reflecting the client's name and residential address where the business operates from:</p> <p>A recent lease/rental agreement;</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes;</p> <p>Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>Documentation must be less than 3 months' old.</p>	<p>An original or certified copy of any one of the following documents reflecting the client's name and residential address where the business operates from:</p> <p>A recent lease/rental agreement;</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes;</p> <p>Telkom account;</p> <p>A Short-term insurance schedule reflecting the risk address.</p> <p>Documentation must be less than 3 months' old.</p>
Income Tax and VAT Registration Number of the Company	Completed Questionnaire	Any official document reflecting client's income tax and VAT number.	A certified copy of an official document reflecting client's income tax and VAT number.
Beneficial Owner(s)	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	Most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation)	Original or certified copy of the most recent version of the CM1 or CK1 or applicable CoR Forms (Certificate of Incorporation) CIPC Search Organogram
<p>Obtain the following for: The manager and directors of the Company Each natural person holding more than 25% of the shares and/or voting rights Each natural person identified as the beneficial owner of the Company Each natural person authorised to act on behalf of the Company (e.g. directors)</p>			
Full Names:	Identity Document if SA Citizen or Passport if Foreign National	Identity Document if SA Citizen or Passport if Foreign National	Original or Certified copy of Identity Document if SA Citizen or Passport if Foreign National
Date of Birth:			
Identity No.:			
Passport No. (if foreign national):			
Citizenship:			
Country of Residence:			

Information Required	Simplified	Standard	Enhanced
Residential Address:	Do not need to verify address but provide if readily available.	<p>A utility or other account bearing the name of the natural person and reflecting the residential address.</p> <p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p> <p>Short-term Insurance Schedule reflecting the risk address</p> <p>If none of these documents are available:</p> <p>A staff member may complete a certification of physical address report</p> <p>The person can make a sworn affidavit regarding his/her physical address</p> <p>Documentation must be less than 3 months' old</p>	<p>An original or certified copy of a utility or other account bearing the name of the natural person and reflecting the residential address.</p> <p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p> <p>Short-term Insurance Schedule reflecting the risk address</p> <p>Documentation must be less than 3 months' old</p>
To identify who has been authorised to establish a business relationship or enter into a single transaction on behalf of the entity	Resolution or Mandate confirming such authorisation or appointment	Resolution or Mandate confirming such authorisation or appointment	Original or Certified copy of Resolution or Mandate confirming such authorisation or appointment
The nature of business	Relevant Questionnaire	Relevant Questionnaire	Relevant Questionnaire

Annexure P – KYC Checklist for a Partnership

Information Required	Simplified	Standard	Enhanced
Name of the Partnership	<ul style="list-style-type: none"> Partnership Agreement Written agreement by all partners confirming there is no partnership agreement. 	<ul style="list-style-type: none"> Partnership Agreement (Certified Copy) Written agreement by all partners confirming there is no partnership agreement. 	<ul style="list-style-type: none"> Partnership Agreement (Certified Copy) Written agreement by all partners confirming there is no partnership agreement. (Certified Copy)
Full Names; Date of Birth; Identity Number; OR (If Natural Person) Full Names; Date of Birth; Name of Country; (If Foreign National) OF <ul style="list-style-type: none"> Every Partner; The Person who exercises executive control over the partnership; and Each Natural person who is authorized to establish a business relationship or single transaction on behalf of the partnership. 	<ul style="list-style-type: none"> Identity Document if RSA Citizen/Resident Passport if Foreign National <ul style="list-style-type: none"> Resolution/Mandate of person exercising executive control. <p>(Do not need to verify business address but provide if readily available.)</p>	<ul style="list-style-type: none"> Identity Document if RSA Citizen/Resident (Certified Copy) Passport if Foreign National (Certified Copy) <ul style="list-style-type: none"> Resolution/Mandate of person exercising executive control. (Certified Copy) <p>(Do not need to verify business address but provide if readily available.)</p>	<ul style="list-style-type: none"> Identity Document if RSA Citizen/Resident (Certified Copy) Passport if Foreign National (Certified Copy) <ul style="list-style-type: none"> Resolution/Mandate of person exercising executive control. (Certified Copy) <p>(Do not need to verify business address but provide if readily available.)</p>
Residential Address:	Do not need to verify address but provide if readily available.	A utility or other account bearing the name of the natural person and reflecting the residential address.	An original or certified copy of a utility or other account bearing the name of the natural person and reflecting the residential address.
Income Tax and VAT Registration Number of the Close Corporation or Company.	Completed Questionnaire	Any official document reflecting client's income tax and VAT number.	A certified copy of an official document reflecting client's income tax and VAT number.
The nature of business	Relevant Questionnaire	Relevant Questionnaire	Relevant Questionnaire

Annexure Q – KYC Checklist for a Trust

Information Required	Simplified	Standard	Enhanced
Name and number of Trust	Trust Deed	Trust Deed	Original or Certified copy of Trust Deed
Name of Trustees	Letter of Authority given by the Master of the High Court (or other documentation depending on the jurisdiction of the Trust) and confirmation of any subsequent changes	Letter of Authority given by the Master of the High Court (or other documentation depending on the jurisdiction of the Trust) and confirmation of any subsequent changes	Original or Certified copy of the Letter of Authority given by the Master of the High Court (or other documentation depending on the jurisdiction of the Trust) and confirmation of any subsequent changes
Address of the Master of the High Court (or other information applicable to the jurisdiction of the Trust) where the Trust is registered	Letter of Authority given by the Master of the High Court (or other documentation depending on the jurisdiction of the Trust) and confirmation of any subsequent changes	Letter of Authority given by the Master of the High Court (or other documentation depending on the jurisdiction of the Trust) and confirmation of any subsequent changes	Original or Certified copy of the Letter of Authority given by the Master of the High Court (or other documentation depending on the jurisdiction of the Trust) and confirmation of any subsequent changes
Particulars of the Founder and Beneficiaries (including how the Beneficiaries are determined)	Trust Deed	Trust Deed	Trust Deed
<p>Obtain the following for: Each Trustee Each natural person who is authorised to establish a business relationship or enter into a single transaction on behalf of the Trust The Founder Each Beneficiary of the Trust referred to by name in the Trust Deed or Particulars of how the Beneficiaries are determined</p>			
Full Names:	Identity Document if SA Citizen or Passport if Foreign National	Identity Document if SA Citizen or Passport if Foreign National	Original or Certified copy of Identity Document if SA Citizen or Passport if Foreign National
Date of Birth:			
Identity No.:			
Passport No. (if foreign national):			
Citizenship:			
Country of Residence:			
Residential Address and Contact Particulars:	Do not need to verify address but provide if readily available.	<p>A utility or other account bearing the name of the natural person and reflecting the residential address.</p> <ul style="list-style-type: none"> • A recent lease/rental agreement • Mortgage statement from a bank • Municipal rates and taxes • Telkom account • Short-term Insurance Schedule reflecting the risk address <p>If none of these documents are available:</p> <ul style="list-style-type: none"> • A staff member may complete a certification of physical address report <p>The person can make a sworn affidavit regarding his/her physical address</p> <p>Documentation must be less than 3 months' old</p>	<p>An original or certified copy of a utility or other account bearing the name of the natural person and reflecting the residential address.</p> <ul style="list-style-type: none"> • A recent lease/rental agreement • Mortgage statement from a bank • Municipal rates and taxes • Telkom account • Short-term Insurance Schedule reflecting the risk address <p>Documentation must be less than 3 months' old</p>

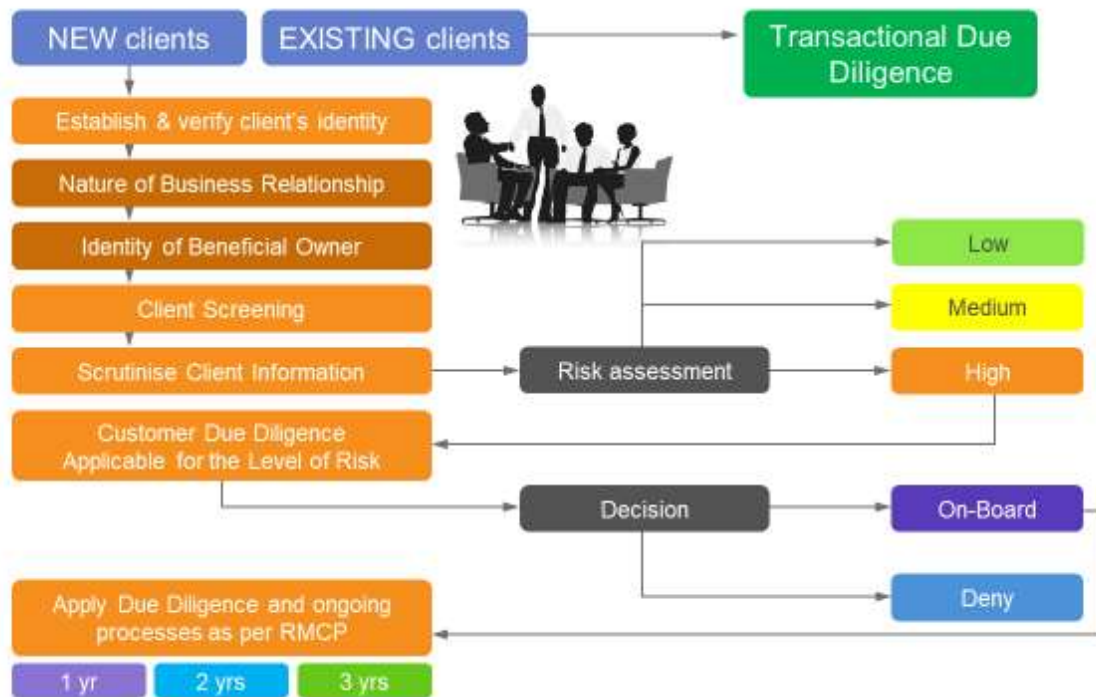
Information Required	Simplified	Standard	Enhanced
To establish who has been authorised to establish a business relationship or enter into a single transaction on behalf of the Trust	Resolution or Mandate confirming such authorisation or appointment	Resolution or Mandate confirming such authorisation or appointment	Original or Certified copy of Resolution or Mandate confirming such authorisation or appointment
The business of the Trust	Relevant Questionnaire	Relevant Questionnaire	Relevant Questionnaire

Annexure R – KYC Checklist for Other Legal Persons (Pension or Provident Fund)

Information Required	Simplified	Standard	Enhanced
Name of the Legal Person	Constitution OR Founding Document of Legal person	Constitution OR Founding Document of Legal person	Constitution OR Founding Document of Legal person
Particulars of the Legal Form	Constitution OR Founding Document of Legal person	Constitution OR Founding Document of Legal person	Constitution OR Founding Document of Legal person
Address from which the Legal Person operates	<p>Any one of the following documents reflecting the name and address from which the Legal Person operates:</p> <p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p> <p>Short-term Insurance Schedule reflecting the risk address</p> <p>If none of these documents are available:</p> <p>A staff member may complete a certification of physical address report</p> <p>The person can make a sworn affidavit regarding his/her physical address</p> <p>Documentation must be less than 3 months' old</p>	<p>Any one of the following documents reflecting the name and address from which the Legal Person operates:</p> <p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p> <p>Short-term Insurance Schedule reflecting the risk address</p> <p>If none of these documents are available:</p> <p>A staff member may complete a certification of physical address report</p> <p>The person can make a sworn affidavit regarding his/her physical address</p> <p>Documentation must be less than 3 months' old</p>	<p>An original or certified copy of any one of the following documents reflecting the name and address from which the Legal Person operates:</p> <p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p> <p>Short-term Insurance Schedule reflecting the risk address</p> <p>Documentation must be less than 3 months' old</p>
Income Tax Number of the Legal Person	Copy of a SARS document bearing such number	Copy of a SARS document bearing such number	Any original or certified copy of SARS document bearing such a number
Obtain the following for each mandated official that is a natural person:			
Full Names:	Identity Document if SA Citizen or Passport if Foreign National	Identity Document if SA Citizen or Passport if Foreign National	Original or Certified copy of Identity Document if SA Citizen or Passport if Foreign National
Date of Birth:			
Identity No.:			
Passport No. (if foreign national):			
Citizenship:			
Country of Residence:			
Residential Address:	Do not need to verify address but provide if readily available.	A utility or other account bearing the name of the natural person and reflecting the residential address.	An original or certified copy of a utility or other account bearing the name of the natural person and reflecting the residential address.
		<p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p>	<p>A recent lease/rental agreement</p> <p>Mortgage statement from a bank</p> <p>Municipal rates and taxes</p> <p>Telkom account</p>

		<p>Short-term Insurance Schedule reflecting the risk address</p> <p>If none of these documents are available:</p> <p>A staff member may complete a certification of physical address report</p> <p>The person can make a sworn affidavit regarding his/her physical address</p> <p>Documentation must be less than 3 months' old</p>	<p>Short-term Insurance Schedule reflecting the risk address</p> <p>Documentation must be less than 3 months' old</p>
<p>For each natural person who has been authorised to establish a business relationship or enter into a single transaction on behalf of the Legal person</p>	<p>Resolution or Mandate confirming such authorisation or appointment</p>	<p>Resolution or Mandate confirming such authorisation or appointment</p>	<p>Original or Certified copy of Resolution or Mandate confirming such authorisation or appointment</p>

Annexure S – Illustration of the Due Diligence Process



Annexure T : Glossary

Abbreviations

AI	Accountable Institution
AML	Anti Money Laundering
BN	Board Notice
CDD	Customer Due Diligence
CFT	Combating the Financing of Terrorism
CTR	Cash Threshold Report
DPIP	Domestic Prominent Influential Person
FIC	Financial Intelligence Centre
FPPO	Foreign Prominent Public Officials
FSCA	Financial Sector Conduct Authority
goAML	An integrated software solution developed for use by Financial Intelligence Units
ML	Money Laundering
MLTFC	Money Laundering and Terrorist Financing Control Regulations
RMCP	Risk Management and Compliance Programme
STR	Suspicious and Unusual Transactions
TF	Terrorist Financing
UN	United Nations
UNSC	United Nations Security Council

Legislation

FAIS	Financial and Intermediary Services Act, 37 of 2004
FICA	Financial Intelligence Centre Act, 38 of 2001
POCA	Prevention of Organised Crime Act, 121 of 1998
POCDATARA	Protection of Constitutional Democracy Against Terrorism and Related Activities, 33 of 2004