

Secure Payments by

RAPIDPAYMENTS™

ONLINE PAYMENTS SIMPLIFIED

**RISK MANAGEMENT & COMPLIANCE PROGRAMME
["RMCP"]**

**RAPID FINANCIAL SERVICES (PTY) LTD T/A RAPID
PAYMENTS**

Policy Name:	FICA RMCP
Policy Owner:	RAPID FINANCIAL SERVICES (PTY) LTD
Signed-Off By:	JUSTIN PAULSE – DIRECTOR
Approved By:	THABISO RAMAHOTSOA – COMPLIANCE OFFICER – RORI CONSULTING (PTY) LTD
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1. Acronyms

Acronym	Meaning
“AML”	Anti-Money Laundering
“CDD”	Client Due Diligence
“CFT”	Combatting Financial Terrorism
“CTR”	Cash Threshold Report
“CTRA”	Series of aggregated transactions report
“DPEP”	Domestic Politically Exposed Person
“FATF”	Financial Action Task Force
“FAIS”	Financial Advisory and Intermediary Services Act, 2002
“FIC”	Financial Intelligence Centre
“FICA”	Financial Intelligence Centre Act
“GAFI”	General Authority For Investment and free zones
“GN”	Guidance Note
“KYC”	Know Your Client
“ML”	Money Laundering
“MLTFC”	Money Laundering and Terrorist Financing Control (Regulations)
“POCA”	Prevention of Organised Crime Act
“PIP”	Prominent Influential Person
“RBA”	Risk Based Approach
“RMCP”	Risk Management Compliance Program
“STR”	Suspicious and unusual Transaction Report
“SAR”	Suspicious Activity Report
“TF”	Terrorist Financing
“TFAR”	Terrorist Financing Activity Report

“TFTR” Terrorist Financing Transaction Report
“TFS” Targeted Financial Sanctions
“UBO” Ultimate Beneficial Owner

2. Definitions

Name / Client

Definition

Any individual or legal entity (corporations, non-profit entities, partnership, trust, funds, correspondent banks, investment managers, etc.). Any person on whose behalf a Client is acting and the person acting on behalf of such any person or entity, who has entered into a relationship or single transaction, is opening an own account or an account for another individual who lacks legal capacity, or contracting directly with a financial institution for the provision of financial products and services;

Prospective Client

Any individual or legal entity (corporations, non-profit entities, partnership, trust, funds, correspondent banks, investment managers, etc.) who intends on entering into a relationship or single transaction, is opening an own account or an account for another individual who lacks legal capacity, or who intends on contracting directly with a financial institution for the provision of financial products and services.

This definition specifically includes a nominated beneficiary on a life insurance policy.

Unlawful activity

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 activity

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.

Beneficial Owner

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

Single Transaction

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).

3. Introduction

Money laundering (ML) is the practice of disguising illegally obtained funds so that they appear to be legally acquired. Money laundering is the manipulation of illegally acquired wealth to hide its true nature or source. Money Laundering is a criminal offense in South Africa as in other jurisdictions with similar anti-money laundering (AML) laws. FICA (Financial Intelligence Centre Act) is South Africa's anti-money laundering legislation.

Rapid Financial Services (Pty) Ltd t/a Rapid Payments with company registration number: 2020/929183/07, is a legal entity registered within the laws of South Africa, as a Third Party Payments Provider (TPPP) registered, with the Payments Association of South Africa. It is important for Rapid Payments to have measures in place to manage the risk of money laundering. Rapid Payments is not an Accountable Institution and therefore does not need to register with the FIC. Rapid Payments is sponsored by an Accountable Institution and has endeavored to put control in place to manage the risk of money laundering.

The entity will manage the risk of money laundering through a thorough understanding of its own business activities and by addressing the potential money laundering risks associated with such activities.

4. Objective

The objective of this document is to provide a framework for the management of money laundering risks. It enables the organisation to identify, assess, mitigate, manage and monitor the risk that the provision by the organisation of its products or services may involve or facilitate money laundering activities or the financing of terrorist and related activities.

5. Application

This FICA RMCP is applicable to:

- The governing body
- Where applicable, all branches, business units and divisions of the entity
- All employees

6. Regulatory Framework

The point 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 enacted 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 (AI). It also regulates the reporting of terrorist related activities.

- The main objective of the amendments is to place a Risk Based Approach at the centre of South Africa's anti-money laundering and combating of financing of terrorism framework. This gives financial institutions the flexibility to determine and manage the risks in their businesses. Failure to comply 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 offenses, 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

- This Act provides for new reporting obligations under FICA. The reporting of suspicious and unusual transactions was extended to cover transactions that relate 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.

7. Responsible Persons

Board of Directors

The board of directors, senior management or the person with the highest level of authority is responsible for ensuring that Rapid Payments maintain an effective internal Anti-Money Laundering and Combatting Financial Terrorism control structure through this Risk Management Compliance Program (“RMCP”).

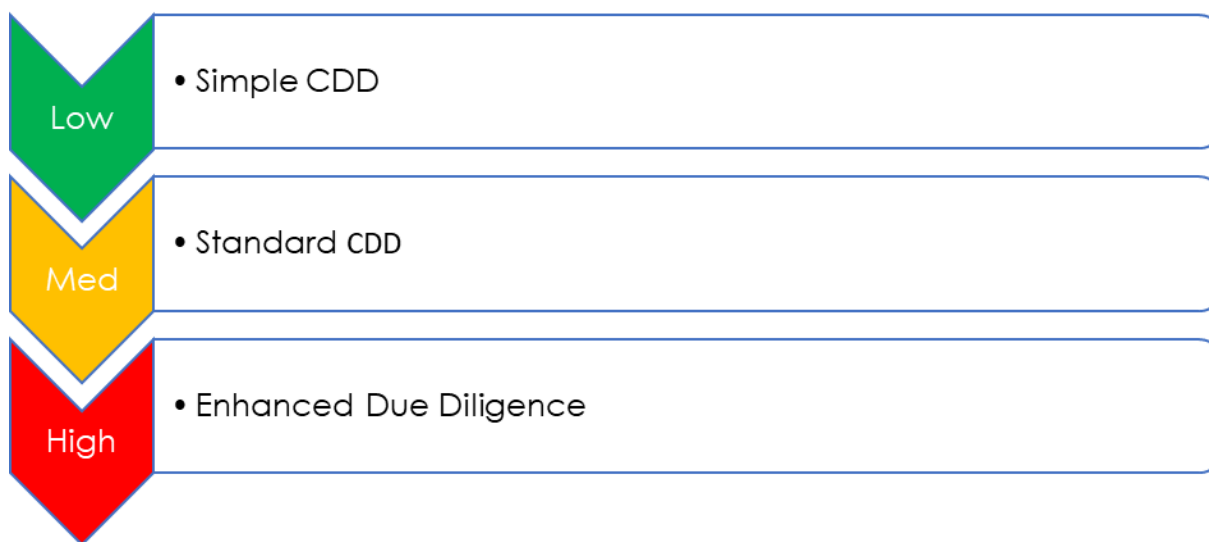
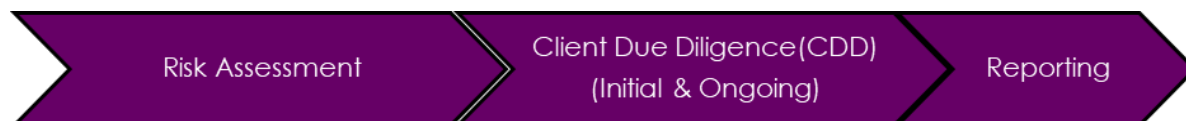
Compliance Officer

Rapid Payments confirms that the Compliance Officer will exercise oversight and management of the practice’s AML duties and obligations to ensure effective management and anti-money laundering and terrorist financing proof of the entity.

8. AML Risk Management

Rapid Payments only conducts business with South African juristic persons.

The AML Risk Management Process can be illustrated as per the below:



Additional Risk Measures

Additional risk management measures that have been implemented are that Rapid Payments:

- ensures that the first payment of funds withdrawn by a client is carried out through an account opened in the client's name within a bank located in a FATF/ GAFI country.
- does not make the bank details for investments available to parties who have not completed the onboarding process.

- require senior management approval prior to:
 - finalisation of transactions under investigation;
 - entering into a relationship with:
 - Domestic Politically Exposed Person
 - Foreign Politically Exposed Person
 - Prominent Influential Person

- does not accept business relationships from clients for which the full KYC procedure cannot be performed (e.g., anonymous clients).
 - Shell banks i.e., a credit institution or similar entity incorporated in a jurisdiction in which it has no physical presence, which is unaffiliated with a regulated financial group, or with any bank or similar entity known to permit its accounts to be used by shell banks.
 - Persons or entities listed that are sanctioned
 - Clients from countries classified by Financial Action Task Force (“FATF”) as presenting substantial and strategic failures to the AML/CTF regulations.

Risk Indicators and Scores

We have considered each risk factor and identified risk indication that fall within each risk factor. These risk indicators and descriptions are found in **Annexure(s) 1 – 5** attached hereto.

Due to our exposure to ML/TF risk, Rapid Payments has classified each risk indicator as being either low, medium, or high.

Risk Level	Explanation
Low	A low-risk measure is used where the likelihood and impact of money laundering and/or terrorist financing is extremely low. Where the overall risk profile of the client is low, a simplified due diligence process will be followed.
Medium	A medium-risk measure is used where the likelihood and impact of money laundering and/to terrorist financing is average. Where the overall risk profile of the client is medium, a standard due diligence process will be followed.
High	A high-risk measure is used where the likelihood and impact of money laundering and/to terrorist financing is extremely high. Where the overall risk profile of the client is low, an enhanced due diligence process will be followed.

9. Client Due Diligence – Know Your Client (KYC)

Rapid Payments shall at the time of commencement of the relationship and before the conclusion of a transaction, identify, verify and obtain information on the purpose and intended nature of the business relationship with clients.

9.1 Verification and Screening

Rapid Payments will establish and verify the identity of every client. The nature and extent of verification of the client's identity is determined by taking the assessed ML/TF risk associated with the relevant business relationship or single transaction into account.

It is important that verification (where required) be done using information obtained from a reliable and independent third-party source and, as far as possible, the original source of the information.

Rapid Payments will conduct appropriate client due diligence as follows, in order to reduce the risk of facilitating money laundering:

- Prior to entering a new business relationship , Rapid Payments will carry out a Client Take-On Due Diligence Process which involves obtaining and evaluating information.
- At regular intervals during a business relationship, we will carry out an Ongoing Due Diligence Process.
- Sanctions screening on all clients against the FIC Targeted financial sanctions list. If a prospective client or existing client appears on a sanctions list, Rapid Payments will not establish a business relationship or conclude a single transaction with that client. Rapid Payments will follow the reporting process by reporting such a person to the Sponsor and Funds of such client will be frozen and reported to the Sponsor for them to submit a report to the FIC.

9.2 Ongoing Due Diligence

Rapid Payments will continue to scrutinize the transaction undertaken by the client throughout the course of the business relationship to verify that transactions are consistent with our knowledge of the client, risk profile and source of funds.

If the transactions are not consistent with the above-mentioned factors, we will submit a report to our sponsoring bank.

Re- screening of clients will be conducted as follows:

SCREENING	
Client profile	Frequency
Low	Annually
Medium	Quarterly
High	Monthly

Refresher

Depending on the risk profile of the client, the client will be required to go through ongoing due diligence. This will include gathering the client due diligence documents again.

The ongoing due diligence will be conducted as follows:

Client risk profile	Ongoing due diligence	Frequency
Low	Simplified	5 years
Medium	Standard	3 years
High	Enhanced	Annually

9.3 When is CDD (Client Due Diligence) not required.

In terms of FICA, a single transaction is a transaction other than a transaction concluded during a business relationship and where the value of the transaction is not more than R5 000.00. In terms of FICA, the full scope of client due diligence measures is not required in respect of clients concluding single transactions below the value of R5 000.

Although the full scope of CDD is not required, we may be called upon to provide the FIC with confirmation that we have or have not dealt with a certain client. Therefore, we must be able to provide at least some information if requested to do so. We will obtain at least some information describing the identity of the client.

We will not, despite a single transaction, deal with an anonymous client or a client with an apparent false or fictitious name and should we come across such client, we **will report them to the Sponsor, to be reported to the FIC.**

We will obtain the following information:

- Full Name / Full Registered Corporate Name
- ID number/ Company Registration Number
- Landline Number / Mobile Number
- Residential/Corporate Address Proof
- UBO Information and UBO declaration form

9.4 When the Client's identity cannot be verified

In the instance when a client does not provide the requested documentation or information within **30 (thirty)** days of being requested to do so, the client will be notified that the business relationship will not be established. This will be reported as a suspicious transaction.

Applications of clients failing to provide the required documentation or information will be escalated for review by the Compliance department and a supervisor, who will then consider the relevant circumstances and apply their discretion in delaying the discontinuation of the business relationship while Rapid Payments facilitates the client's efforts to rectify the failure.

The (potential) business relationship may be discontinued if the decision by the Compliance department and supervisor is the same, and once the client has been informed of the potential implications and given time to respond accordingly.

Rapid Payments will not enter a business relationship or conclude a single transaction with or on behalf of an anonymous client, or any client who provides insufficient or false information.

9.5 Documentation

The followings requirements must be followed regarding client documentation:

- Documentation provided by clients should be legible, have a valid expiry date and a distinguishable picture;
- SA ID documentation should be a bar-coded or Smart ID Card in a colour copy;
- Proof of Residence/ Proof of Address documentation should be no older than 3 months.

9.6 When doubts exist about the veracity of previously obtained information

If doubts arise about the veracity of previously obtained documentation or information post CDD, this should be reported to the Compliance Officer, who will request that the responsible person repeat certain or all the CDD steps as outlined in this RMCP or who will contact an independent third party(s) to verify the information.

Where the Compliance Officer cannot arrange for successful verification, the Compliance Officer must investigate further to determine if a suspicious activity / transaction report should be lodged to the sponsoring bank.

The client should be notified that their account will be frozen until verification could take place. Decisions to terminate the business relationship will be taken in

conjunction with senior management of the company.

9.7 Ultimate Beneficial Owner (UBO)

Rapid Payments is required to identify the natural person who ultimately owns or controls a client and/or the natural person on whose behalf a transaction is being conducted. Rapid Payments will require clients to declare the identity of the UBO and provide evidence to the effect.

The UBO is the:

- person who holds 25% or more of share capital; or
- person who exercises 25% or more of the voting rights; or
- a beneficiary of 25% or more of the legal entity's capital; or
- a '*nominee director*' appointed on behalf of another person and used to conceal the identity of the true owner of the company or some illicit activity; or
- a company or other legal entity who is a '*corporate director*', who may be used to construct complex and opaque corporate structures across multiple jurisdictions to facilitate illicit activity; or
- a holder of 'bearer shares' which do not require registration of the owner and can be transferred simply with changing hands of the share certificate. This anonymous ownership may be used for tax evasion, money laundering or illegal activities.

Rapid Payments will determine the UBO in the following manner:

Step 1 – Identify every natural person who has controlling ownership interest in the legal person (e.g., shareholding), if in doubt. (Move to step 2 if the UBO could not be identified.)

Step 2 – Identify every natural person who exercises control over that legal person through other means (e.g., proxy).(Move to step 3 if UBO could not be identified)

Step 3 – Identify every natural person who exercise control over the management of that legal person (management, directors).

Rapid Payments will require a UBO declaration (as part of the CDD process) from each entity / legal person with whom it concludes a business relationship as envisaged in this document.

9.8 DPEP, PIPs and FPEP

In the process of establishing a business relationship with a prospective client, we will determine whether such client is a DPEP, PIP or FPEP. Senior management approval is required in order to accept business with such clients.

Employees

The company will determine the level of ML/TF/PF risk an employee's role in the organisation presents and accordingly attend to the proportionate screening of each employee in accordance with the level of risk identified. Sanction screening will be done on all prospective and current employees.

Employee Risk Determination

The below indicators will be used to indicate the level of risk an employee's role presents for both prospective and current employees.

Employee Risk Indicators		Yes	No
Does the role form part of senior management?			
Does the role entail the involvement in deciding whether or not to take on a high-risk client as required?			
Does the role entail decision making which could alter the AML, CTF and/or CPF regime of the organisation?			
Does the role entail access to privileged/confidential information?			
Does the role entail deciding who to onboard as a client and who not?			
Does the role entail the signing-off of important company documentation?			
Total			
LOW	MEDIUM	HIGH	
0	1-2	3-6	

Employee's Role Risk Level	Frequency of Competency and Integrity Screening
Low (0)	5 Years
Medium (1-2)	3 Years
High (3-6)	Annually

10. Financial Intelligence Centre Reports (FIC)

10.1 Types of Reports

The following types of reports must be lodged with the FIC:

- a) **Activity reports which include:**
 - Suspicious activity report ; and
 - Terrorist financing activity report.

- b) **Transaction reports which include:**
 - Suspicious and unusual transaction report ; and
 - Terrorist financing transaction report.

- c) **Cash Threshold Reports which include:**
 - Cash threshold report.

10.2 Reporting Obligation

10.2.1 Suspicious Transactions

The obligation to report arises when a person knows of certain facts, on the one hand, or in circumstances in which a person **ought reasonably to have known** or suspected that certain facts exist on the other. This means that any person associated with a business, as described above, must report his or her knowledge or suspicion to the sponsoring bank, to be reported to the FIC whenever:

- He or she becomes aware of something; or circumstances arise in which a person can reasonably be expected to be aware of something; or
- Circumstances arise in which a person can reasonably be expected to suspect something.

The requirement to report also applies to situations where the business or transaction has been turned down or has not proceeded if the circumstances were suspicious.

10.2.2 Cash Threshold Reports

As a general rule, Rapid Payments prohibits cash remittance by customers and advises its customers to use acceptable cashless modes of payment (wire transfer, demand draft and/or credit card) to settle their due and/or overdue merchant fees.

The obligation to report in terms of section 28 of the FIC Act arises when a transaction (“CTR”), is concluded with a client by means of which cash in excess of the prescribed amount, that is, R49 999, 99:

- is paid to the client, or to a person acting on behalf of the client, or to a person on whose behalf the Client is acting; or
- is received by the entity from the client, or from a person acting on behalf of the client, or from a person on whose behalf the client is acting.

Cash is defined in section 1 of the FIC Act as:

a) Coin and paper money of the Republic of South Africa or of another country that is designated as legal tender and that circulates as, and is customarily used and accepted as, a medium of exchange in the country of issue; and

b) Traveler's cheques.

Cash threshold reports should be submitted to the FIC within 3 days of the transaction.

Rapid Payments will submit the report to the sponsor bank within 2 days of such transactions.

10.2.3 Terrorist Property Reports

The Section 28A "TPR" obligation of the FIC Act applies to a purely factual situation. The fact that an accountable institution has for example the property of a sanctioned entity in its possession or under its control is enough to prompt a report and no activity relating to that property is required to trigger the reporting obligation.

A report made in terms of Section 29 of the FIC Act would refer to a particular transaction or activity which is found to be suspicious or unusual in nature ("TFTR/TFAR"), while a report in terms of Section 28A of the FIC Act ("TPR") relates to property which is under

an accountable institution's control and is known to be connected to the financing of terrorist activities.

Rapid Payments is required to "screen" all/certain client(s) against the UN1267 list. Should a client's name be found to match an entity or individual on the UN1267 list, the Compliance Officer will make every effort to ensure that this is in fact an exact match. The Compliance officer will make use of the information available and conduct further research if so required, to make this determination.

Rapid Payments should submit the report to the Sponsor bank within 3 (three) days in order for the sponsor bank to report the transaction to the FIC within the 5 (five) day deadline.

10.3 Transactions under investigation / Reported on

Suspicious transactions under investigation must be delayed if possible and without tipping off the relevant client. If the transaction cannot be delayed, it must be approved by senior management and the Compliance Officer before finalization.

If a Terrorist Property Report is made to the Centre, it is an offence (by virtue of Section 4 of the POCDATARA Act) to continue dealing with that property in any way. No further transactions on behalf of the client may be undertaken.

All transactions under investigation, must be reported by the company to the sponsoring bank.

10.4 Confidentiality

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

Section 29 of the FIC Act prohibits any reporter as well as any other person who knows or suspects that a report has been made from disclosing any information regarding that report except for information disclosed:

- within the scope of the powers and duties of that person in terms of any legislation;
- for the purpose of carrying out the provisions of the FIC Act;
- for the purpose of legal proceedings, including any proceedings before a judge in chambers;
- in terms of an order of court.

Communication within Rapid Financial Services (Pty) Ltd t/a Rapid Payments, will be limited to appropriate persons necessary to finalize this process.

10.5 FIC Reports Register

Transactions escalated for investigation as well as transactions submitted to the sponsoring bank by the company, such sponsoring bank shall submit same to the FIC and it must be recorded in the relevant FIC Reports register.

11. Proliferation Financing

Proliferation financing refers to an activity which has or is likely to have the effect of providing property, a financial or other service or economic support to a non-state

actor that may use the finance to manufacture, acquire, possess, develop, transport, transfer or use of nuclear, chemical or biological weapons and their means of delivery and includes activities which constitute offences in terms of section 49A of FICA.

Indicators of possible proliferation financing:

- parties that are in proliferating countries.
- end user not identified.
- cash used in transactions for industrial items.
- parties involved in activity that is not in line with their profile.
- details of parties are similar to parties listed under the Weapon of Mass Destruction sanctions or trade controls.

12. Record keeping

All records will be stored securely in a manner that allows for easy retrieval.

Records referred to in this document will be kept for the following periods:

Record Description	Period
Records of a transaction or activity which gave rise to a suspicion, escalated internally for investigation and if relevant the sponsoring banks FIC report.	at least 5 years from the date on which the report was submitted to the FIC, by the sponsoring bank

Records confirming the identity of Clients and details of Client transactions.	will be retained for at least 5 years or longer after the business relationship has been terminated.
Records relating to an on-going Investigation.	will be retained until it is confirmed that the case has been closed by the relevant authorities.

13. Training

Employees must fully understand Rapid Payments' AML/CFT obligations and have access to this RMCP.

Rapid Payments will ensure that all employees receive relevant AML/CFT training at least once a year. The Rapid Payment's FICA RMCP is always accessible to all staff. Attendance registers will be kept as proof of training.

Monitoring will be conducted at least annually, to ensure all relevant staff participate in AML/CFT training and have access to the AML/CFT and all other policies and procedures manuals held with respect to AML/ CFT.

14. Adoption

This RMCP has been approved by the Board of Rapid Financial Services (Pty) Ltd t/a Rapid Payments.

Signed:



Justin Paulse – Director – Rapid Financial Services (Pty) Ltd t/a
Rapid Payments

15 November 2023

Date

Annexure 1

Risk Rating Matrix

Risk classification	Risk Score
Low	1
Medium	2
High	3

Risk Rating Framework			
Type of product		Risk Rating	Rationale
	Juristic Person	2	Difficulty in establishing beneficial ownership.
	Prominent Influential Person	3	Vulnerable to abuse by or of senior officials. May have adverse media.
	Domestic Politically Exposed Person	3	Vulnerable to abuse by or of senior officials. May have adverse media.
	Foreign Politically Exposed Person	3	Vulnerable to abuse by or of senior officials. May have adverse media.
	Sanctioned	Do not do business.	

Distribution channel	Face to face	1	Identification can be easily verified.
	Online channels	2	Difficulty in verifying identity.
Geographic location	Local	1	In terms of sector risk assessment South African citizens are regarded as low risk.
	Foreign client	2	Cross border transfers Difficulty in verifying residence.
	High Risk jurisdiction	3	High risk of money laundering and terrorist financing Sanctioned countries

Annexure 2

Matrix

Sum of risk score	Risk Classification	Information obtained	Documents required to verify.	Screening	Adverse media
1-5	Low risk Simplified CDD	Company name Company registration Country of incorporation Registered address Tax number Company structure Director name Director date of birth Residential address Shareholder name Shareholder date of birth	Certificate of Incorporation Memorandum and Articles of Association Register of directors ID of directors Director's proof of address UBO ID UBO proof of address Register of members Declaration of trust (if applicable)	X	

		Shareholder residential address Corporate shareholder name Shareholder registration address UBO(above 25% shareholding) name UBO date of birth UBO residential address			
6-10	Medium: Standard CDD	Company name Company registration Country of incorporation Registered address Tax number Company structure Director name Director date of birth Residential	Certificate of Incorporation Memorandum and Articles of Association Register of directors Id of directors Director's proof of address UBO ID UBO proof of address Register of members Declaration of trust (if applicable)	X	X

		address Shareholder name Shareholder date of birth Shareholder residential address Corporate shareholder name Shareholder registration address UBO (above 25% shareholding) name UBO date of birth UBO residential address			
11 -15	High: Enhanced Due Diligence	Company name Company registration Country of incorporation Registered address Tax number Company structure	Certificate of Incorporation Memorandum and Articles of Association Register of directors Id of directors Director's proof of address UBO ID UBO proof of address Register of members	X	X

		Director name Director date of birth Residential address Shareholder name Shareholder date of birth Shareholder residential address Corporate shareholder name Shareholder registration address UBO(above 25% shareholding) name UBO date of birth UBO	Declaration of trust (if applicable)		
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Annexure 3

Domestic Politically Exposed Persons

In terms of the FIC Act, A Domestic Politically Exposed Person is an individual who, holds, including in an acting position for a period exceeding six months, or has held a prominent public function in the Republic, 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 (Act No. 117 of 1998).
- a leader of a political party registered in terms of the Electoral Commission Act, 1996 (Act No. 51 of 1996).
- a member of a royal family or senior traditional leader as defined in the Traditional Leadership and Governance Framework Act, 2003 (Act No. 41 of 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 (Proclamation No. 103 of 1994);
- the municipal manager of a municipality appointed in terms of section 54A of the Local Government: Municipal Systems Act, 2000 (Act No. 32 of 2000), or a chief financial officer designated in terms of section 80(2) of the Municipal Finance Management Act, 2003 (Act No. 56 of 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 (Act No. 1 of 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 (Act No. 32 of 2000);
- a constitutional court judge or any other judge as defined in section 1 of the Judges' Remuneration and Conditions of Employment Act, 2001 (Act No. 47 of 2001).
- An officer of the South African Defense Force above the rank of major-general.

Annexure 4

Foreign Politically Exposed Person

In terms of FICA, a foreign prominent public official is an individual who holds, or has held, in any foreign country a prominent public function including that of a—

- Head of State or head of a country or government.
- member of a foreign royal family.
- government minister or equivalent senior politician or leader of a political party.
- senior judicial official.
- senior executive of a state-owned corporation; or
- high-ranking member of the military

Annexure 5

Prominent Influential Person

In terms of FICA A prominent influential person is an individual who holds, or has held at any time in the preceding 12 months, the position of–

- chairperson of the board of directors;
- chairperson of the audit committee;
- executive officer; or
- chief financial officer,

of a company, as defined in the Companies Act, 2008 (Act No. 71 of 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.

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