



GHT (PTY) LTD — RISK MANAGEMENT AND COMPLIANCE PROGRAMME (RMCP)

In terms of Section 42 of the Financial Intelligence Centre Act, No. 38 of 2001 (as amended)

Entity Name: GHT (Pty) Ltd

FSP Category: Category I (Long-term Insurance)

FIC Org ID: 66904

Date of Adoption: 21 August 2026

Next Mandatory Review Date: 21 August 2027

1. RMCP ADOPTION & STATUTORY GOVERNANCE

This Risk Management and Compliance Programme (RMCP) constitutes the formal Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), and Counter-Proliferation Financing (CPF) control framework for GHT (Pty) Ltd ("GHT").

- **Highest Level of Authority:** Nicole du Plooy (Chief Executive Officer / Key Individual).
- **FICA Compliance Officer & MLRO:** Nicole du Plooy.
- **Internal Compliance Monitoring:** Karl Sapire.
- **External Compliance Advisory:** Moonstone Compliance (Pty) Ltd.

2. INSTITUTIONAL RISK ASSESSMENT & RISK-BASED APPROACH (RBA)

GHT applies a Risk-Based Approach (RBA) in accordance with FIC Guidance Note 7. Because GHT's core business involves low-premium funeral and long-term insurance policies distributed to individual policyholders, the institution's overall inherent exposure to illicit financial flows is structurally low.

Risk Rating Classification

- **Low Risk:** South African citizens and residents acquiring standard funeral or life cover funded via direct debit or automated grant deductions.
- **Medium Risk:** Third-party premium payers or cross-border Southern African Development Community (SADC) transactions.

- High Risk: Politically Exposed Persons (PEPs, DPIPs, and FPEPs), high-value single premiums, unverified third parties, or entities associated with adverse media.

3. CUSTOMER DUE DILIGENCE (CDD) PROTOCOLS

3.1 Standard Due Diligence (Natural Persons)

Prior to entering into a single transaction or establishing a business relationship, GHT verifies:

- Full name, surname, and South African Identity Number (or valid Passport details for foreign nationals).
- Residential address or verified contact details.
- Confirmation of the client's source of funds (e.g., formal employment, grant disbursement, or pension).

3.2 Simplified Due Diligence (SDD)

- Applied to low-risk, small-scale life and funeral products where premium amounts are strictly limited.
- Requires basic identity verification against national population registers or automated validation databases before policy activation.

3.3 Enhanced Due Diligence (EDD)

Mandatory when dealing with High-Risk scenarios:

- **Senior Management Approval:** Written sign-off from Nicole du Plooy before onboarding.
- **Source of Wealth & Funds:** Verification of documented origin of total wealth and ongoing premium funding.
- **Ongoing Transaction Monitoring:** Bi-annual review of policy maintenance, beneficiary amendments, and payout destinations.

4. PEP SCREENING & TARGETED FINANCIAL SANCTIONS (TFS)

- **Politically Exposed Persons Screening:** All prospective clients, policyholders, and nominated beneficiaries are screened at inception against Domestic Prominent Influential Person (DPIP) and Foreign Politically Exposed Person (FPEP) databases (Schedule 3A & 3B of FICA).
- **Targeted Financial Sanctions (Sections 26A–26C):** GHT maintains zero tolerance for sanctioned entities. Real-time screening is executed against the **United Nations Security Council Consolidated Sanctions List** and FIC TFS notices.
- **Mandatory Prohibition:** GHT will not establish a relationship, execute a transaction, or process a claim involving any person or entity listed on a TFS list.



5. STATUTORY FIC REPORTING OBLIGATIONS

All regulatory reports are submitted electronically via the FIC's secure **goAML** portal under **Org ID 66904**:

Report Type	FICA Section	Operational Trigger	Statutory Timeline
Cash Threshold Report (CTR)	Section 28	Cash transactions (received or paid) of R49,999.99 and above (effective threshold).	Within 3 business days of becoming aware.
Suspicious & Unusual Transactions (STR / SAR)	Section 29	Any transaction or interaction suspected to involve proceeds of crime, tax evasion, money laundering, or structuring to avoid detection.	Within 15 business days of forming the suspicion.
Terrorist Property Report (TPR)	Section 28A	Possession or control of property linked to a sanctioned individual, terrorist entity, or PF offense.	Within 5 business days of identification; asset must be frozen immediately.

- **Tipping-Off Prohibition:** In terms of Section 29, employees are strictly prohibited from informing the client, policyholder, or any unauthorized third party that an STR or SAR has been lodged with the FIC.

6. RECORD KEEPING & DATA RETENTION (SECTIONS 22–24)

- **Retention Period:** GHT retains all Customer Due Diligence (CDD) records, identification documents, transactional logs, call recordings, and copies of FIC reports for a minimum of **5 years** from the date a business relationship is formally terminated, or a single transaction is concluded.
- **Storage & Security:** Records are archived in secure, encrypted cloud environments and backed up to the dedicated Disaster Recovery (DR) server every 2 hours (databases) and 12 hours (media/documents).

7. EMPLOYEE SCREENING & MANDATORY TRAINING (DIRECTIVE 8 & SECTION 43)

- **Pre-Employment Screening:** Prospective employees and field sales representatives undergo verification for criminal history, credit checks, qualification authenticity, and TFS sanctions screening prior to formal appointment.
- **Annual FICA Training:** All customer-facing agents, administrative staff, and management undergo annual AML/CTF/CPF training covering red-flag identification, CDD capture, and reporting protocols. Training attendance and comprehension records are maintained in the compliance repository.



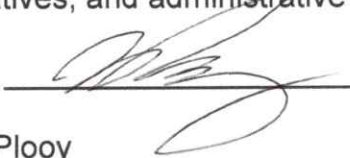
8. NON-APPLICABLE SECTIONS (SECTION 42(2A))

Pursuant to Section 42(2A) of the Act, the following provisions are declared non-applicable to GHT's operations:

- **Section 42(2)(q):** Foreign branch/subsidiary governance is non-applicable as GHT operates exclusively within the Republic of South Africa and has no foreign entities.
- **Correspondent Banking Requirements:** Non-applicable as GHT does not provide correspondent banking or inter-bank payment clearance services.

EXECUTIVE ADOPTION DECLARATION

I, Nicole du Plooy, in my capacity as the Chief Executive Officer and designated FICA Compliance Officer of GHT (Pty) Ltd, hereby approve, adopt, and enforce this streamlined Risk Management and Compliance Programme across all operations, representatives, and administrative divisions.

Signature:  _____

Nicole du Plooy

Chief Executive Officer & FICA Compliance Officer

GHT (Pty) Ltd