

**Risk Management and Compliance Programme
for
Econo Group Schemes**



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Definitions:

FICA: Financial Intelligence Centre Act

Accountable Institution – A registered institution in terms of FICA

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 (as amended) 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.

Beneficial Ownership register: The register to be kept is for the applicable companies and close corporations to submit any beneficial ownership information relating to that entity. Anyone with more than 5% beneficial ownership of a company or close corporation must submit (file) with the CIPC, the requisite information as per updated General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Act (General Laws Amendment Act)

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).

Cash Physical cash in notes and coins

Money Laundering activities:

Cash Threshold Report (CTR): Report that must be made to FIC on the Go-AML system when an amount of more than R49999.99 in cash is paid or received by Econo Group Schemes. (Refer to Annexure A Amendments to Money Laundering and Terrorist Financing Control Regulations, 2002)

Cash Threshold Report Aggregate (CTRA): More than one payment amounting to more than R49 999.99 cash in 24 Hours received or paid that must be reported to the FIC within 3 days on the Go-AML system. (Refer to Annexure A Amendments to Money Laundering and Terrorist Financing Control Regulations, 2002)

DPEPs – Domestic Politically Exposed Persons FPEPs – Foreign Politically Exposed Persons

PIPs – Prominent Influential Persons

CDD – Customer due diligence. CDD information comprises the facts about a customer that should enable an organisation to assess the extent to which the customer exposes it to a range of risks. The steps and procedures taken to identify and verify clients

MLRO – Money Laundering Reporting Officer

Proliferation Financing: The FAFT defines proliferation financing as raising, moving, or making available funds or other economic resources/assets to assist for, in whole or in part, with the proliferation of nuclear, chemical, or biological weapons, i.e., weapons of mass destruction (WMDs).

1. Introduction

The RMCP was implemented after the FIC Amendment Act was promulgated and gave all accountable institutions the responsibility to have a RMCP that outlines their risk-based approach. Econo Group Schemes has implemented this RMCP and it was signed off by Johan van Niekerk in his capacity as sole member of Econo Group Schemes.

2. Background of the Accountable Institution (AI)

2.1 The AI is Econo Group Schemes a Closed Corporation with registration number 2005/019760/23 and Accountable institution nr AI/110324/00034. The sole member of the FSP is Johan van Niekerk. The AI Currently has 4 key individuals to wit:

- 2.1.1 Johan van Niekerk
- 2.1.2 Elizabeth van Niekerk
- 2.1.3 Riaan Douglas
- 2.1.4 Vincent Nkotsi Mathebula

The AI operates from:

**BOARDWALK OFFICE PARK,
PHASE 5,
BLOCK A SUITES
1ST FLOOR,
HAYMEADOW STREET
FAERIE GLEN
PRETORIA**

2.2 The AI has five administrative staff members with duties that include:

- Capturing new policy data
- Assistance to juristic representatives with regard to claims
- Capturing of claim documents
 - Handling of enquiries
 - Updating of the monthly schedules
 - Submitting of debit orders

2.3 The AI is licensed as a long-term insurance Category 1 Subcategory A financial service provider with FSP no: 13413. The AI is also registered as a Category 4 assistant business financial service provider. The AI is registered with the Financial Intelligence Centre with Org ID number AI/110324/00034.

2.4 The AI has the following clients:

2.4.1 Natural Persons – Juristic representative's owners and clients on ground level

2.4.2 Juristic Persons – Juristic representatives

2.5 The AI provides administrative services to clients/juristic representatives as authorized in the FAIS licence.

3 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 section 4, 5 or 6 of the Prevention of Organised Crime Act 121 of 1998 (POCA).

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.

4 General Duties

Section 42 of the FIC Act (as amended) requires Econo Group Scheme 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 FIC Act (as amended), 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 FSP must ensure compliance with applicable laws, including the FIC Act (as amended) and other applicable anti-money laundering or terrorist financing legislation. Therefore, the RMCP forms part of our Governance and Risk Management Framework.

As an accountable institution, we have a duty to:

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

5 Objective

The RMCP is a powerful document that contains information regarding ML/TF activities, reporting and recognition. The manual also provides for training of staff members and provides guidelines about record keeping.

6 Risk Management

The AI will not enter a business relationship with an anonymous client or a client with an apparent false or fictitious name. This will be done by face-to-face onboarding of natural clients and contractual arrangements with juristic representatives as well as face to face onboarding with juristic representatives.

7 Governance

7.1 Accountability

Johan van Niekerk will be responsible for ensuring that the AI maintain an effective control structure through the RMCP in terms of the requirements of the FIC ACT. A culture of compliance must be created within the AI. Johan van Niekerk accepts responsibility in terms of the RMCP.

7.2 Compliance function

Johan van Niekerk has the following responsibilities:

Johan van Niekerk – MLRO
Johan van Niekerk – FICA Compliance Officer
Nela Andrade – Assistant FICA Compliance Officer

7.3 Implementation of the RMCP

Section 42(2)(q) of the FIC Act (as amended) requires the RMCP to include the way in which the RMCP will be implemented to enable compliance with its obligations. Econo Group Schemes only operates from the address as provided in 2 above.

7.4 Review of the RMCP

Johan van Niekerk will be responsible for reviewing the RMCP on an annual basis or when there is a change in legislation or when there are changes in the business functions. Every review will be saved separately and signed off.

7.5 Availability of the RMCP to all staff

RMCP will be available to all staff and online. Any alterations made to the RMCP will be highlighted and pointed out to the representatives when a new RMCP is loaded online. Hardcopies will also be available.

8 Scope

The RMCP applies to all staff members of Econo Group Schemes as well as all representatives and juristic representatives. The only exception will be staff members who do not handle any transactions, applications, or claims. These will include staff such as tea ladies and general admin staff that do not sell policies or handle claims.

9 Consequences of Non-Compliance

Non-compliance to the RMCP will lead to a disciplinary process being initiated. The disciplinary process must be up to date and every staff member must be aware thereof. In the event of someone being found guilty in terms of the disciplinary procedure then such person will face a written warning or even dismissal taking into account the seriousness of the non-compliance. If a representative is guilty of an offence in this regard, then such representative may face being debarred.

10 Registration

10.1 Changes to Information

Johan van Niekerk must inform the Centre of any changes to Econo Group Schemes' details by updating the accounts online within **15 (fifteen) days** of such change, as required in terms of section 43B(4) of the FIC Act (as amended) or at least 15 days prior to the effective date of Johan van Niekerk's resignation.

10.2 Penalties

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

11 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 affected 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.

Directive 8 of 2023- Screening of employees for competence and integrity and scrutinising of employee information against applicable targeted financial sanctions lists as money laundering, terrorist financing and proliferation financing control measures. (Refer Annexure B)

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)

- 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.

12 Approach to Risk

Econo Group Schemes' approach

To identify money laundering and terrorist financing risks by considering the financial product, size of the transaction, services and geographical location of the client or business

a. Risk factors:

We use the following risk factors to determine the client's risk profile:

- Product and size of transaction
- Delivery methods like face-to-face interaction or direct sales via electronic sales
- Client type
- Geographic location

b. Risk Indicators:

We have adopted a low risk on natural persons because of the size of the transaction which is exceptionally small and the fact that we only deal with South African citizens.

Products:

- Funeral Cover
- Product cannot be converted into cash to fund terrorism.
- Exceptionally low-value product.
- The product does not provide anonymity to the client.

Geography:

- South African Citizens
- SA citizens are regarded as low risk in terms of the sector risk assessment

Nature of Clients:

Natural Persons (Only principal members are screened)

- Can easily be identified
- Face-to-face onboarding
- Easy screening against watchlists

Juristic Persons

- Easily identified and verified through means of contractual agreement and registration documents.
- Face-to-face onboarding with a juristic representative

- Easy screening against watchlists

Premiums:

- Exceptionally low amounts - Recurring premiums varying between R8.50 and R350.00 with an average of R39.00

13 Risk Assessment

As indicated above all transactions with regard to new policies are of low risk and Standard needs must be applied. The only exception will be if a prospective client is screened and found to be a DPEP.

Econo Group Schemes will then regard such client as medium risk and standard CDD will be applied. When Econo Group Schemes signs up a new juristic representative a low-risk approach will be followed.

Econo will be using the DocFox system for screening purposes and through this technology be able to screen each client be it natural or juristic daily. Should any changes occur, or a person be flagged against any of the necessary screening lists, we will be notified by the system and appropriate measures will be taken.

This screening includes a comprehensive Watchlist (UN list 1267) Screening solution while identifying DPEPss (Domestic Politically Exposed Persons), FPEPs (Foreign Politically Exposed Persons), PIPs (Prominent Influential Persons) including sanctioned individuals and organizations, in real-time and on a nightly basis.

During onboarding the following Risk Rating will be done on each prospective client.

	1	2	3
Interaction with Client	Face- to- Face	Non- Face to Face	-
Geographical Location	SA	SA	-
Size of transaction	R10-R350	R350+	-
Client type	Individual	Juristic Representative	DPEPs, FPEPs, PIPs
Type of Product	Funeral	-	-

14 Risk

Natural clients:

New clients must complete an application form containing the following info:

- Full names and surname
- Date of birth
- Country of Birth
- Identity No
- Residential address
- Country of Residence
- Nationality
- Method of Transaction
- Value of Transaction (monthly premium amounts)
- Relationship to clients
- Source of Funds
- Contact number

Legal persons:

A contract needs to be signed containing the following info:

- Registered name of the Company
- Registration number under which the Company is incorporated
- Name (Trading) under which the Company conducts business
- Most recent version of the CM1 or CK1 or applicable COR Forms
- Registered address of the Company or Close Corporation
- Name and surname of the natural person responsible
- Id number
- Original or Certified copy of Identity Document

15 Customer Due Diligence (CDD)

Customer due diligence (CDD) refers to the knowledge that an accountable institution has about its client and the institution's understanding of the business that the client is conducting with it. This starts with knowing the identity of the client. Verification of clients' names against given identification numbers/registration numbers will be done by Econo Group Schemes on the DocFox platform at onboarding stage and before acceptance. This will allow Econo Group Schemes to screen every natural person and juristic representative against all the watchlists.

15.1 Econo Group Schemes contracts with the juristic representative and offers to administrate its members (Book/Group) (clients). Econo Group Schemes renders the intermediary services between the juristic representative and the underwriter which implies the following processes:

- a. The collection of members' details as per the standard acceptance form.
- b. Capturing of details onto the system.
- c. Updating of schedules with new members, additional members, cancelled members and deceased members.
- d. At the end of the month, the juristic representative receives an updated schedule for the month which indicates all members that paid.

15.2 Procedures in place for each risk assessment:

Low Risk:

All transactions with clients on ground level (policies) are low risk as indicated above due to the product being of a very low value, only South African citizens are signed up, and only natural persons can obtain a funeral policy.

New juristic representatives will also be rated as low risk. CDD will be done on an ongoing basis by using the platforms.

Medium Risk due to DPEP:

In the unlikely event that a client is flagged as a DPEP, Econo Group Schemes will treat such client as medium risk. Standard due diligence will be done.

15.3 Econo Group Schemes does not conduct business with partnerships or any trusts.

15.2 All cash transactions above the prescribed amount will be reported to the FIC by way of the formal online process (GO-AML).

15.3 Should any information/document seem to be fraudulent at application stage no policy will be issued.

15.4 Since Econo Group Schemes only does business with South African Residents and not with foreigners.

15.5 Any new business by juristic representatives will be sent to Econo Group Schemes and this will then be screened before acceptance of the policy. The necessary information given by the juristic representative to Econo Group Schemes will be used for the screening of every prospective client against all the watchlists. Should a client's Risk profile change due to screening, Econo Group Schemes will enhance the CDD on such client.

- 15.9 Screening of every prospective main member will always be done before onboarding and acceptance of the policy. Relevant information such as full names and surname, identity number and address. Where applicable or in the case of a juristic person the registration number, address, identity number of the person in charge and also his or her full name and surname will be sent to Econo Group Schemes. This information will be loaded to screen the individuals against the watchlists and adverse media. Every client must be approved on these platforms before onboarding and acceptance of the policy.

16 Establishing the Identity of a Juristic Representative

The AI will only do business with legal entities such as juristic representatives if there is a binding agreement between the AI and the entity and also when the AI is in possession of a copy of the entity's registration documents. These documents should reflect the name under which the legal person has been incorporated as well as the physical address. The identity of the owner of each legal person should be verified by means of an ID document. In the case where CDD is done on a juristic representative and the veracity of documents cannot be confirmed or the juristic representative is reluctant to provide the CDD documents, Econo Group Schemes will issue a warning in writing to such a representative and allow for two weeks to correct the aforementioned. Should the representative not comply within the said timeframe, Econo Group Schemes will initiate proceedings to cancel the agreement between them.

17 Record Keeping

All new documents are sent to the AI by the representatives for screening and acceptance. These documents are then printed and stored as hard copies. The soft copies are stored off-site by a 3rd party company, RubiBlue.

Econo Group Schemes has a contractual relationship with RubiBlue to store its data. RubiBlue is an IT company that specializes in off-site storage of data. All data is immediately accessible when needed. IT window does the backups on office data and all the data that is not covered by Rubi Blue

All documents will be kept for a period of five years after the policy lapses or if the policy is paid out. Documents must be stored for a minimum period of 5 years from the date when the business relationship is terminated, or the transaction is concluded. All records of CTR and CTRA will be saved after reporting and entered into a register that will be kept up to date by the compliance department. Unusual patterns of transactions which have no apparent business or lawful purpose will be identified by Econo Group Schemes if they arise and written findings will be kept relating thereto as directed in FICA Sec 42(2)(h).

It should be noted that due to the low amount of premiums in the industry there will seldom to never be any complex or unusually large transactions.

18 Reporting

Econo Group Schemes will, within three business days, report to the Centre the prescribed particulars concerning an unusual or suspicious transaction or activities or a transaction concluded with a client if in terms of the transaction an amount of cash in excess of the prescribed amount that is received by Econo Group Schemes from the client, or from a person acting on behalf of the client, or from a person on whose behalf the client is acting. Detection will be done on bank statements or by means of a report given by one of the representatives to the MLRO.

The MLRO will then report the unusual or suspicious transaction or cash deposit above the prescribed amount to the FIC. CTR's and CTRA's will be reported within 3 days and suspicious and/or unusual transactions will be done within 15 days.

Econo Group Schemes does not have under its control or in its possession property owned or controlled by or on behalf of, or at the direction of –

- any entity which has committed, attempted to commit, or facilitated the commission of a specified offence as defined in the Protection of Constitutional Democracy against Terrorist and Related Activities Act, 2004. DocFox will screen all clients daily and ongoing basis after being uploaded to the system.
- a specific entity identified in a notice issued by the President, under section 25 of the Protection of Constitutional Democracy against Terrorist and Related Activities Act, 2004; or
- a person or an entity identified pursuant to a resolution of the Security Council of the United Nations contemplated in a notice referred to in section 26A(1), must within the prescribed period report that fact and the prescribed particulars to the Centre. . (Refer to Annexure A Amendments to Money Laundering and Terrorist Financing Control Regulations, 2002)

19 Unusual or suspicious transactions

Any transaction that is unusual or suspicious in nature will be reported through the Go-AML system to the FIC. The MLRO will report these transactions within 3 business days. Unusual or suspicious transactions include but is not limited to:

- Unusually large amounts being paid into Econo Group Schemes Account
- Request for reversal of transactions
- Request for usage of account to store money
- Unknown single transactions
- Transactions that are structured in an extraordinary or unusual way.

These transactions must be reported whether it was paid in cash or not.

Cash Threshold is currently R49 999.99 . (Refer to Annexure A Amendments to Money Laundering and Terrorist Financing Control Regulations, 2002)

20 Implementation

- a. RMCP will be presented online, via email, face-to-face to all staff and juristic representatives..
- b. RMCP will be implemented into the organization through constant training and several awareness exercises as well as online tests to test the representatives' knowledge of the RMCP and FICA.
- c. RMCP will be updated on a yearly basis unless legislation changes within the period between updates.

21 Termination of business relationship

A business relationship will always be cancelled when a client provides false information or fraudulent documentation. Econo Group Schemes will also terminate the business relationship in any case where it is impossible to identify the client or do the necessary CDD or screening. If a transaction or attitude of a client is suspicious and/or unusual, Econo Group Schemes will report it to the FIC within the relevant timeframe of 15 days as a suspicious activity.

22 Training

FICA training and in-house training will provide for staff readiness for picking up on AML issues and suspicious or unusual transactions such as listed under 19 above.

Training will take the form of online training and email with hard copies when online facility is not available. Some of the training material will be supported with tests to test the candidate's knowledge and compliance with the subject.

23 Go-AML

Johan van Niekerk will have access to the Go-AML and it will be monitored monthly. A register will be kept for all CTR and CTRA reports.

24 Business day

For all general purposes, a business day will be any day Monday to Friday between 08h00 and 16h00 excluding public holidays.

25 Business relationships

- The second that Econo Group Schemes accepts a client, after the verification process, a business relationship is formed between Econo Group Schemes and the client. Safrican will however have the final say in accepting the client.
- Regarding juristic representatives a business relationship is formed as soon as the agreement between Econo Group Schemes and the juristic representative is signed and the relevant registration documents are received, and screening is done.

26 Nature and intended purpose of the business relationship

Section 21A of the FIC Act requires accountable institutions to ascertain from a prospective client what the nature and intended purpose of the business relationship will be, as well as to obtain information on the source of funds that the prospective client expects to use during the business relationship. This is however self-evident given the nature of the product we provide.

27 Screening of prospective clients

Every prospective client will be entered into the DocFox system and screened against the Sanction lists (Including UN list 1267), DPEP and FPEP's lists. This will be done before acceptance of the business relationship. No policy will come into effect before such screening is done.

Should a person be flagged against any of the sanction lists, Econo Group Schemes will not enter into a business relationship with that person. If a person is flagged as a DPEP, Econo Group Schemes will still do business with such a person, but the Risk Rating will be medium on such a person and management must sign off on the establishment of the business relationship.

Econo Group Schemes does not do business with foreigners and thus will not do business with any FPEP's

28 Acceptance of funds before verification of client

The acceptance of funds by Econo Group Schemes from a prospective client prior to completing the client identification and verification requirements is in contravention of

section 21 of the FIC Act and will not be done. Econo Group Schemes will first complete the identification and verification and accept the client before accepting any funds from said client.

29 Accountability

Johan van Niekerk is appointed as MLRO (Money Laundering Reporting Officer). As sole member of Econo Group Schemes he has adequate seniority and experience to assist with ensuring compliance with the FIC Act. He will be accountable for reporting all CTR and Suspicious or Unusual transactions to the FIC as soon as possible and always within 3 days of incident. Nela Andrade is been appointed as the assistant MLRO. Econo Group Schemes strives to run a business that has no such reports and works towards limiting the possibilities thereof.

30. Beneficial Ownership Register

The recently enacted General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Act (General Laws Amendment Act) has introduced several changes to the beneficial ownership framework including by harmonising the concept of a beneficial owner across key pieces of legislation, namely the Financial Intelligence Centre Act (FIC Act), the Companies Act and the Trust Property Control Act. These Acts now all contain definitions of a beneficial owner that refer to a natural person who directly or indirectly ultimately owns or exercises effective control of a legal person or a trust.

The Econo Group has implemented a Beneficial Ownership Register and the beneficial member is Johan Van Niekerk with 100% ownership of the Econo Group. See Annexure D attached)

31. Proliferation Financing

See detailed explanation in Annexure C

The Risk Management and Compliance Programme has been approved by Johan van Niekerk in his Capacity as Member at Pretoria on this 12/09/2023



Johan van Niekerk