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1. OVERVIEW

Hollard Investments has implemented a Risk Management & Compliance Programme ("RMCP") and encompasses the processes and procedures employed by Hollard Investments to identify, assess, monitor, mitigate and manage any risks related to money laundering and the financing of terrorist activities.

The purpose of this document is to list the documents required for Hollard Investments to conduct its Customer Due Diligence requirements as required in terms of the:

- a) Financial Intelligence Centre Act No 38 of 2001 as amended by the Financial Intelligence Centre Amendment Act of 2017;
- b) associated regulations and guidance notes;
- c) the Prevention of Organized Crime Act No 24 of 1999.

Customer Due Diligence relates to the steps and procedures taken to identify and verify clients. For the purposes of abbreviation, it is also referred to as "CDD". During the CDD process we will risk rate clients as either low, medium or high risk and based on these risk ratings we will carry out different forms of identification and verification. We will call for documentation in addition to the standard new business pack requirements where applicable.

In addition to the documents required to identify and verify clients, Hollard Investments shall screen prospective clients against a number of watch lists. Such screening aims to identify whether the prospective client is one of the following:

- a) Sanctioned individuals;
- b) Organized crime and threat finance; and
- c) Politically Influential Person relationships.

Screening is a vital first step in the client on-boarding process. Failure to screen prospective clients materially impacts the ability of Hollard Investments to effectively meet the requirements imposed by the Act and could potentially expose Hollard Investments to money-laundering and terrorist related offences.

Hollard Investment may request additional requirements not contained in this document should it be required to successfully identify and verify a client as well as determine the source of funds used for investment purposes.



2. CUSTOMER DUE DILIGENCE DOCUMENTATION REQUIREMENTS

2.1 RETIREMENT FUNDS EXEMPTION

Registered retirement funds are exempted from all CDD procedures and document requirements.

2.2 2.2 RETIREMENT PRODUCTS CDD REQUIREMENTS

Clients investing in a Living Annuity, Retirement Annuity and/or Preservation Fund will undergo a Customer Due Diligence and may not be required to provide additional CDD documents (other than those listed in the application form). Where applicable we will call for additional documentation should this be required.

2.3 ONGOING CDD MEASURES

Hollard Investments clients will be actively monitored and be required to provide up-to-date contact details and CDD Documentation via electronic communication on an ongoing basis as detailed in the table below to ensure that the risk ratings and information on record are accurate.

Client Risk Category	Frequency of Updated CDD Documentation Required
Low Risk	Every 5 years
Medium Risk	Every 3 Years
High Risk	Every 18 Months

In addition to the above ongoing CDD measures, should a client transact on their investments, updated CDD documentation may be requested.



3. "CUSTOMER DUE DILIGENCE" DOCUMENTATION

In order to adhere to CDD requirements, prospective and existing client details will be verified against acceptable forms of documentation. Failure to provide the requested documentation and verify the client's identity will result in no transactions being processed and no business relationship being formed.

3.1 SOUTH AFRICAN CITIZENS

Investments made by a Natural Persons and their Representatives

NATURAL PERSONS	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT
Identification:	ID Document / Passport / Driver's License
Income Tax Number:	SARS Document / Salary Slip
Residential Address:	Proof of Address (not older than 3 months)
Source of Funds	As per confirmation in Application

REPRESENTATIVE OF A NATURAL PERSON	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT
Proof of Representation:	Letter of authority, Court order etc.
Identification:	ID Document / Passport / Driver's License
Income Tax Number:	SARS Document / Salary Slip
Residential Address:	Proof of Address (not older than 3 months)

Investments made on behalf of a Minor by a Parent or Legal Guardian

- Verified copy of South African green bar-coded ID/new smart card ID or valid passport of the Natural Parent as Guardian of the Minor Client.
- Verified copy of the minor's birth certificate stipulating the name(s) of the natural parent(s).

If the name(s) of the natural parent(s) is not stated on the birth certificate, the following documents will be required:

- Copy of sworn Affidavit from the natural parent confirming that the guardian is the natural parent of the minor, signed in front of an independent commissioner of oaths.
- Copy of the natural parents' marriage certificate or copy of Sworn Affidavit from the natural parent confirming the marriage (signed in front of an independent commissioner of oaths).

If the investment is made by a court appointed Guardian and not the natural parent(s) of the minor, the following documents must be provided:

- Verified copy of proof of guardianship from the Master of the Supreme Court.
- Verified copy of the minor's birth certificate.



3.2 FOREIGN NATIONALS

Investments made by a Natural Persons and their Representatives

NATURAL PERSONS			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Identification:	Passport		
South African Income Tax Number (if issued):	SARS Document / Salary Slip		
Residential Address:	Proof of Address (not older than 3 months)		
Source of Funds	As per confirmation in Application		
REPRESENTATIVE OF A FOREIGN NATIONAL			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Proof of Representation:	Letter of authority, Court order etc.		
Identification:	Passport		
Residential Address:	Proof of Address (not older than 3 months)		

3.3 LEGAL ENTITIES: SOUTH AFRICA

Investments made by South African Companies

If a company is listed on a recognised security exchange, no FICA documentation (apart from **Proof of Listing**) is required. This exemption does not apply to subsidiaries of a listed company, whether wholly owned or not. For all unlisted South African companies, the following documents will be required:

SA COMPANIES		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	CM1 & CM2 / CoR 14.1, CoR 14.3 & CoR 15.1	
Registered Address:	CM1 & CM2 / CoR 21 or Confirmation Certificate.	
	Proof of Address (not older than 3 months)	
Name under which Conducting Business:	Corporate Letterhead if not included on the company	
	registration documents or proof of bank account	
Income Tax & VAT Numbers:	SARS Documents	
Ownership Structure:	Company Share Register / Corporate Organogram	
	/CoR	
	RESENTATIVES:	
For each Authorised Inc	dividual of the Company	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	ID Document / Passport / Driver's License	
Residential Address:	<u>Proof of Address</u> (not older than 3 months)	
Proof of Representation:	Resolutions / Letter of Authorization	
INDIVIDUAL SHAREHOLDERS OVER 25%		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Proof of Shareholding:	Share Certificate / Company Share Register / CoR	
Identification:	ID Document / Passport / Driver's License	
CORPORATE SHAREHOLDERS OVER 25%		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Proof of Shareholding:	Share Certificate / Company Share Register	
Identification:	CM1 & CM2 / CoR 14.1, CoR 14.3 & CoR 15.1	
Registered Address:	CM1 & CM2 / CoR 21 or Confirmation Cert.	
	Proof of Address (not older than 3 months)	
Name under which Conducting Business:	Corporate Letterhead / CoR	



3.4 PARTNERSHIPS

The FICA Amendment Act of 2017 subjects Partnerships to enhanced Customer Due Diligence procedures in terms of Section 21B. The following documents will be required:

PARTNERSHIPS		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Partnership Agreement	
Registered Address:	Partnership Agreement	
	Proof of Address (not older than 3 months)	
PART	TNERS	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Number & Identity of Partners	Partnership Agreement	
Identification of Partners:	ID Document / Passport / Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	
Income Tax Number:	SARS Document	
REPRESENTATIVES OF PARTNERS		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Proof of Representation:	Letter of authority, Court order etc.	
Identification:	ID Document / Passport / Driver's License	
Income Tax Number:	SARS Document	
Residential Address:	Proof of Address (not older than 3 months)	
Contact Particulars:	Telephone number / Cell Number / Email	

3.5 CLOSED CORPORATIONS

CLOSED CORPORATIONS			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Identification:	CK1 & CK2		
Registered Address:	CK1 & CK2		
	Proof of Address (not older than 3 months)		
Name under which Conducting Business:	Corporate Letterhead		
Income Tax & VAT Numbers:	SARS Documents		
CORPORATION REPRESENTATIVES:			
For each Member and Authorised Individual of the Company			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Identification:	ID Document / Passport / Driver's License		
Residential Address:	Proof of Address (not older than 3 months)		
Proof of Representation:	Resolutions / Letter of Authorisation		



3.6 TRUSTS

The FICA Amendment Act of 2017 subjects Trusts to enhanced Customer Due Diligence procedures in terms of Section 21B in addition to those stipulated in the Regulations. The following documents will be required:

TRUSTS		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Trust Deed / Founding Document	
Address of the Master of the High Court:	Letter of Authority	
Income Tax Number:	SARS Document	
TRUSTEES OF A TRUST		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	ID Document / Passport / Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	
Authority to Act:	Letter of Authority	
BENEFICIARIES OF A TRUST		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	ID Document / Passport / Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	
FOUNDER OF A TRUST		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	ID Document / Passport / Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	

3.7 LOCAL RETIREMENT FUNDS

All retirement funds are required to provide a registration certificate issued by an authorised regulatory body. Depending on the provision of the certificate, the retirement fund will also be required to provide the following:

REGISTERED RETIREMENT FUND (REGISTRATION CERTIFICATE AVAILABLE)		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Registration Certificate	
RETIREMENT FUND REPRESENTATIVES		
For each authorised Individual of the Retirement Fund		
IDENTIFICATION TYPE DOCUMENT VERIFICATION REQUIREMENT		
Identification:	ID Document / Passport / Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	
Authority to Act:	Letter of Authority	

If a Retirement Fund is unable to provide a Registration Certificate:

The "retirement fund" will be required to provide full FICA, including:

- Full FICA on the retirement fund.
- Full FICA on each board member, trustee and signatory.
- Full FICA on beneficial ownership and shareholding.



3.8 FOREIGN RETIREMENT FUNDS

All retirement funds are required to provide a registration certificate issued by an authorised regulatory body. Depending on the provision of the certificate, the retirement fund will also be required to provide the following:

REGISTERED RETIREMENT FUND (REGISTRATION CERTIFICATE AVAILABLE)		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Registration Certificate	
RETIREMENT FUND REPRESENTATIVES		
For each authorised Individual of the Retirement Fund		
IDENTIFICATION TYPE DOCUMENT VERIFICATION REQUIREMENT		
Identification:	ID Document / Passport / Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	
Authority to Act:	Letter of Authority	

If a Retirement Fund is unable to provide a Registration Certificate:

The "retirement fund" will be required to provide full FICA, including:

- Full FICA on the retirement fund.
- Full FICA on each board member, trustee and signatory.
- Full FICA on beneficial ownership and shareholding.

3.9 LEGAL ENTITIES: FOREIGN CORPORATIONS

Investments made by a Foreign Corporations

FOREIGN COMPANIES			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Identification:	Business Registration Documents		
Registered Address:	Business Registration Documents		
Name under which Conducting Business in Country of Incorporation:	Corporate Letterhead		
Operating Address in Country of Incorporation:	Proof of Address (not older than 3 months)		
Name under which Conducting Business in South	Corporate Letterhead		
Africa:			
Operating Address in South Africa:	Proof of Address (not older than 3 months)		
Income Tax & VAT Numbers (if issued):	SARS Documents		
COMPANY REPRESENTATIVES:			
For each Authorised Individual of the Company			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Identification:	Passport		
Residential Address:	Proof of Address (not older than 3 months)		
INDIVIDUAL SHARE	HOLDERS OVER 25%		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Proof of Shareholding:	Share Certificate / Company Share Register		
Identification:	ID Document / Passport / Driver's License		
CORPORATE SHARE	HOLDERS OVER 25%		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Proof of Shareholding:	Share Certificate / Company Share Register		



Identification:	Business Registration Documents
Registered Address:	Business Registration Documents

4. ACCEPTABLE DOCUMENTS FOR PROOF OF RESIDENTIAL ADDRESS

For documents issued on a monthly basis, the document provided to Hollard Investments cannot be older than 3 months. For documents issued on an annual basis, the document provided to Hollard Investments cannot be older than 12 months. The items below are acceptable in terms of proof of residential address.

- A lease/rental agreement.
- Affidavit from a CC/Company/Partnership or Mandated Official.
- Affidavit from a person co-habiting with the client.
- Affidavit from clients Employer.
- Bank Statements, must evidence an official bank stamp.
- Declaration from the clients Financial Advisor after an on-site visit within 3 months of the on-site visit.
- Long term/short term insurance policy document issued by an insurance company.
- Mortgage /home loan statement.
- Motor vehicle license documentation.
- Municipal rates and taxes invoice.
- Retail store statement of account.
- Telephone or Cellular account.
- Utility Bill reflecting Erf/stand no if sent to a P O Box.
- Valid TV License.

5. DOUBTS CONCERNING DOCUMENT VERACITY

Should Hollard Investments at any time doubt the veracity of the provided CDD Documentation for a given client, Hollard Investments shall contact the client using the contact information on file and request that new CDD Documentation be provided as soon as possible. Hollard Investments may also make use of external Credit Bureaus and Home Affairs to verify the data.

6. HOLLARD INVESTMENTS CONTACT DETAILS

Hollard Investments

Email: customercare@hollardinvestments.co.za

Website: www.hollard.co.za

Physical Address: Hollard Villa Arcadia, 22 Oxford Road, Parktown, 2193

Postal Address: PO Box 87419, Houghton, Johannesburg, 2041 **Tel:** 0860 202 202 (If you are calling from within South Africa)

Tel: +27 (0)11 351 5000 (If you are calling from outside South Africa)

Fax: +27 (0)11 351 3816

Hollard Compliance: compliance@hollard.co.za

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