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#### 1. OVERVIEW

Hollard Investments has implemented a Risk Management & Compliance Programme ("RMCP") and it 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 RETIREMENT PRODUCTS CDD REQUIREMENTS

Clients investing in a Living Annuity, Retirement Annuity and/or Preservation Funds 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:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport / Driver's License
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:	Green Barcoded ID Document / Both sides of the Smart
	ID card/ Valid Passport / Driver's License
Residential Address:	Proof of Address (not older than 3 months)

Please note: Hollard Investments may require information as provided above for beneficiaries nominated on a policy.

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

- Verified copy of South African green bar-coded ID, both sides of the 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:	Valid Passport / Valid Refugee Permit/ Valid Work permit	
Residential Address:	<u>Proof of Address</u> (not older than 3 months)	
Source of Funds	As per confirmation in Application	
REPRESENTATIVE OF A FOREIGN NATIONAL		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
<b>Proof of Representation:</b>	Letter of authority, Court order, Power of Attorney etc.	
Identification:	Valid Passport / Valid Refugee Permit/ Valid Work permit	
Residential Address:	Proof of Address (not older than 3 months)	

Please note: Hollard Investments may require information as provided above for beneficiaries nominated on a policy.

### 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:

SOUTH AFRICAN COMPANIES		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Launched pre 11 May 2011	
	<ul> <li>Certificate of Incorporation (CM1)</li> </ul>	
	<ul> <li>Certificate of change of name of company (CM9) (if applicable)</li> </ul>	
	<ul> <li>Notice of Registered Office and Postal Address (CM22)</li> </ul>	
	<ul> <li>Contents of Register of Directors, Auditors and Officers (CM29).</li> </ul>	
	Launched after 11 May 2011	
	The new Companies Act came into effect on 1 May 2011. For all companies	
	incorporated prior to 1 May 2011, i.e. before the new Companies Act came into	
	effect, the old forms will still apply, i.e. the old CM forms. Those companies	
	incorporated in terms of the new Companies Act; the new forms will apply. These	
	are listed below as follows:	
	Notice of Incorporation (CoR 14.1)	
	<ul> <li>Certificate of Registration (CoR 14.3)</li> </ul>	
	<ul> <li>Certificate of name change (CoR 14.3) where the company has changed</li> </ul>	
	its name	
	<ul> <li>Notice of registered office and postal address (CoR 21.1)</li> </ul>	
Registered Address:	Proof of business address of the company e.g. utility bill (not older than 3	
	months) reflecting the name and business address.	
Name under which	Corporate Letterhead if not included on the company registration documents or	
Conducting Business:	proof of bank account	
Ownership Structure:	Company Share Register / Corporate Organogram /CoR	



COMPANY REPRESENTATIVES:		
	orised Individual / Director / CEO / CFO / COO / MD of the Company	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport / Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	
<b>Proof of Representation:</b>	Resolutions / Letter of Authorization	
	INDIVIDUAL SHAREHOLDERS OVER 25%	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Proof of Shareholding:	Share Certificate / Company Share Register / CoR	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport / Driver's License	
Residential Address and contact details:	Written confirmation of the residential address and contact particulars of the authorised signatories individuals holding 25% or more of the voting rights	
	CORPORATE SHAREHOLDERS OVER 25%	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Proof of Shareholding:	Share Certificate / Company Share Register	
Identification:	Launched pre 11 May 2011	
	Certificate of Incorporation (CM1)	
	<ul> <li>Certificate of change of name of company (CM9) (if applicable)</li> </ul>	
	<ul> <li>Notice of Registered Office and Postal Address (CM22)</li> </ul>	
	<ul> <li>Contents of Register of Directors, Auditors and Officers (CM29).</li> </ul>	
	Launched after 11 May 2011	
	Notice of Incorporation (CoR 14.1)	
	<ul> <li>Certificate of Registration (CoR 14.3)</li> </ul>	
	<ul> <li>Certificate of name change (CoR 14.3) where the company has changed its name</li> </ul>	
	Notice of registered office and postal address (CoR 21.1)	
Registered Address:	<u>Proof of Address</u> (not older than 3 months)	
Name under which	Corporate Letterhead if not included on the company registration documents or	
Conducting Business:	proof of bank account	
Authorised / Controlling	For each Authorised Individual / Director / CEO / CFO / COO / MD / of the	
Persons	Company	
	<ul> <li>Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport / Driver's License</li> </ul>	
	<ul> <li><u>Proof of Address</u> (not older than 3 months)</li> </ul>	
	Resolutions / Letter of Authorization	

# 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:	Certificate of incorporation, Trust Deed or Partnership Agreement	
Registered Address:	Certificate of incorporation, Trust Deed or Partnership Agreement <u>Proof of Address</u> (not older than 3 months)	
Control over Partnership:	Certificate of Incorporation, Trust Deed or Partnership Agreement of the legal person(s) who exercise executive control over the Partnership.	
<b>Proof of Representation:</b>	Resolutions / Letter of Authorisation	

PARTNERS		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
<b>Identification of Partners:</b>	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport /	
	Driver's License	
Residential Address:	<u>Proof of Address</u> (not older than 3 months)	
REPRESENTATIVES OF PARTNERS		
IDENTIFICATION TYPE DOCUMENT VERIFICATION REQUIREMENT		
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport /	
	Driver's License	
Residential Address:	Proof of Address (not older than 3 months)	

### 3.5 CLOSED CORPORATIONS

CLOSED CORPORATIONS		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	<ul> <li>Founding Statement or Certificate of Incorporation (CK1)</li> <li>Amended Founding Statement (CK2) (if the member of the CC has changed).</li> </ul>	
Registered Address:	Proof of Address (not older than 3 months)	
Name under which	Corporate Letterhead or CK documents	
<b>Conducting Business:</b>		
<b>Proof of Representation:</b>	Resolutions / Letter of Authorisation	
CORPORATION REPRESENTATIVES:		
For each Memb	er and Authorised Individual /CEO / CFO / COO / MD of the Company	
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport /	
	Driver's License	
Residential Address:	<u>Proof of Address</u> (not older than 3 months)	

Please note: Hollard Investments may require information as provided above for beneficiaries nominated on a policy.

### 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	Letter of Authority signed by the Master of the High Court	
the High Court:		
Authority to Act:	Letter of Authority	
TRUSTEES OF A TRUST		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport /	
	Driver's License	
Residential Address:	<u>Proof of Address</u> (not older than 3 months)	



BENEFICIARIES OF A TRUST		
<b>IDENTIFICATION TYPE</b>	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport / Driver's License. If the beneficiary is a legal person, please see the requirements applicable for the said entity type.	
Residential Address:	Proof of Address (not older than 3 months)	
FOUNDER OF A TRUST		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport / Driver's License	
If deceased:	Death certificate	
Residential Address:	<u>Proof of Address</u> (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	
	Trustee Register	
	Board Resolution	
RETIREMENT FUND REPRESENTATIVES		
For each authorised Individual of the Retirement Fund		
<b>IDENTIFICATION TYPE</b>	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid 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.

Please note: Hollard Investments may require information as provided above for beneficiaries nominated on a policy.



### 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	
	Trustee Register	
	Board Resolution	
RETIREMENT FUND REPRESENTATIVES		
For each authorised Individual of the Retirement Fund		
<b>IDENTIFICATION TYPE</b>	DOCUMENT VERIFICATION REQUIREMENT	
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport /	
	Driver's License	
<b>Residential Address:</b>	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.

Please note: Hollard Investments may require information as provided above for beneficiaries nominated on a policy.

# 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	Corporate Letterhead / Business Registration Documents	
Conducting Business in		
Country of Incorporation:		
Operating Address in	Proof of Address (not older than 3 months)	
Country of Incorporation:		
Name under which	Corporate Letterhead	
Conducting Business in		
South Africa:		
Operating Address in	Proof of Address (not older than 3 months)	
South Africa:		
<b>Proof of Shareholding:</b>	Share Certificate / Company Share Register	
<b>Proof of Representation:</b>	Resolutions / Letter of Authorisation	



COMPANY REPRESENTATIVES:			
For each Authorised Individual / Director / CEO / CFO / COO / MD of the Company			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Identification:	Valid Passport		
Residential Address:	<u>Proof of Address</u> (not older than 3 months)		
INDIVIDUAL SHAREHOLDERS OVER 25%			
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Proof of Shareholding:	Share Certificate / Company Share Register		
Identification:	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid Passport /		
	Driver's License		
Residential Address:	Written confirmation of the residential address and contact particulars of the		
	authorised signatories individuals holding 25% or more of the voting rights		
	CORPORATE SHAREHOLDERS OVER 25%		
IDENTIFICATION TYPE	DOCUMENT VERIFICATION REQUIREMENT		
Proof of Shareholding:	Share Certificate / Company Share Register		
Identification:	Business Registration Documents		
Registered Address:	Business Registration Documents / Proof of business address of the company e.g.		
	utility bill (not older than 3 months) reflecting the name and business address.		
Authorised / Controlling	For each Authorised Individual / Director / CEO / CFO / COO / MD / of the		
Persons	Company		
	Green Barcoded ID Document / Both sides of the Smart ID card/ Valid		
	Passport / Driver's License		
	<ul> <li><u>Proof of Address</u> (not older than 3 months)</li> </ul>		
	Resolutions / Letter of Authorization		

#### 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 (on an official bank letterhead)
- 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

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Hollard Compliance: compliance@hollard.co.za

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