Financial
Intelligence Centre

COMPLIANCE IN PRACTICE - SAICA

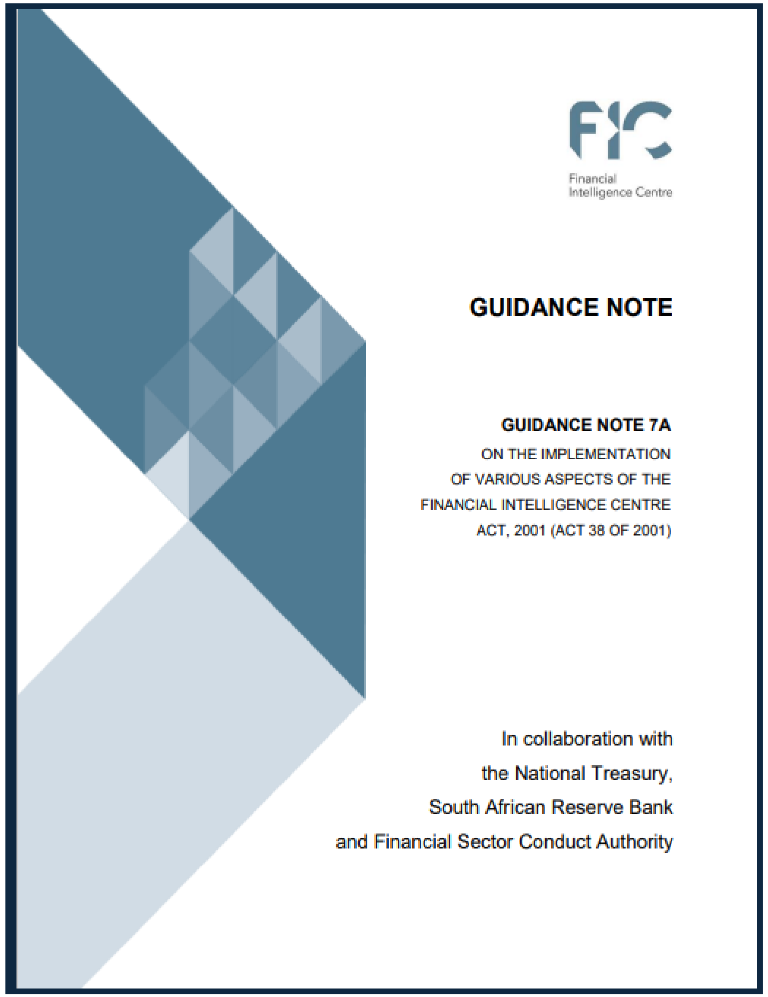
15 May 2025

ACRONYMS

AML	Anti-money laundering	**RMCP**	Risk management and Compliance Programme
FATF	Financial Action Task Force	**RCR**	Risk and Compliance Return
FIC	Financial Intelligence Centre	**DNFBPs**	Designated non-financial businesses and professions
PF	Proliferation financing	**POCA**	Prevention of Organised Crime Act, 121 of 1998
ML	Money laundering	**POCDATARA**	Protection of Constitutional Democracy Against Terrorist and Related Activities Amendment Act, 2022 (Act 23 of 2022)
TF	Terrorist financing	**GLAA**	General Laws Amendment Act 22 of 2022
GN	Guidance Note	**PCC**	Public Compliance Communication
DPEP	Domestic Politically Exposed Person	**FPEP**	Foreign Politically Exposed Person

Guidance note 7A

- Issued February 2025
- **Replaces chapter 4 on the RMCP only**
- Discusses the role of directors/ the board and the approval of the RMCP.
- Discusses the adequacy of the RMCP.
- Elements of an effective RMCP and the documentation of an RMCP.
- Risk identification of the entity
- Documentation of the RMCP


Financial Intelligence Centre

GUIDANCE NOTE

GUIDANCE NOTE 7A
ON THE IMPLEMENTATION
OF VARIOUS ASPECTS OF THE
FINANCIAL INTELLIGENCE CENTRE
ACT, 2001 (ACT 38 OF 2001)

In collaboration with
the National Treasury,
South African Reserve Bank
and Financial Sector Conduct Authority

Guidance note 7A: Role of the board of directors, senior management, or the persons with the highest level of authority in the accountable institution

- The accountable institution’s board of directors, or senior management, or the person(s) with the highest authority must approve the RMCP and ensure compliance by the accountable institution and its employees with the provisions of the FIC Act and its RMCP.
- The obligation to approve the RMCP and accountability cannot be delegated and must be approved by them.
- Where the accountable institution is a sole proprietor, the obligation for approval of the RMCP and accountability of the person(s) with the highest authority cannot be delegated.

Guidance note 7A: Role of the board of directors, senior management, or the persons with the highest level of authority in the accountable institution

- The RMCP must adequately address the full scope of section 42 of the FIC Act. The board of directors, senior management or other person(s) with the highest authority should ensure that the RMCP is **adequate**, **suitable** and **effective** for the accountable institution.
- The RMCP must be described comprehensively in the documentation tabled for approval by the board of directors, senior management or person(s) with the highest authority. The RMCP documentation should not merely reference other documents but must include an adequate and substantial description of the elements of the RMCP.
- The board of directors, senior management and person(s) with the highest authority is solely responsible for the adequateness of the RMCP and will be held accountable if the RMCP is found to be inadequate.

Role of the board of directors, senior management, or the persons with the highest level of authority in the accountable institution

- Example 1: Obligation and accountability of the board cannot be delegated

The board of directors of Bank K must approve the RMCP, the board cannot delegate its obligations in terms of the FIC Act. The board may have a committee that ***provides advice on the suitability*** *of the RMCP, however, the committee* ***cannot take the decision to approve*** *the RMCP. The obligation to approve the RMCP remains with the board.*

Elements of an effective RMCP and the documentation of an RMCP

- Sections 42(1), 42(2) and 42(2A) of the FIC Act indicates what must be included in an accountable institution's RMCP. The Centre recommends that the RMCP documentation includes the following three parts as a minimum:

Part 1

Identification and assessment of the risk the accountable institution faces of being abused for ML, TF and PF (e.g. the risk-based approach assessment, methodology, framework, entity, product and service offerings, developing technologies, delivery mechanisms, enablement processes, business processes and client risk assessments etc.) as well as an indication of the accountable institution's risk tolerance level or appetite.

Part 2

Mitigation and management of risks identified through applying appropriate controls, including customer due diligence (CDD), reporting and record keeping, etc.

Part 3

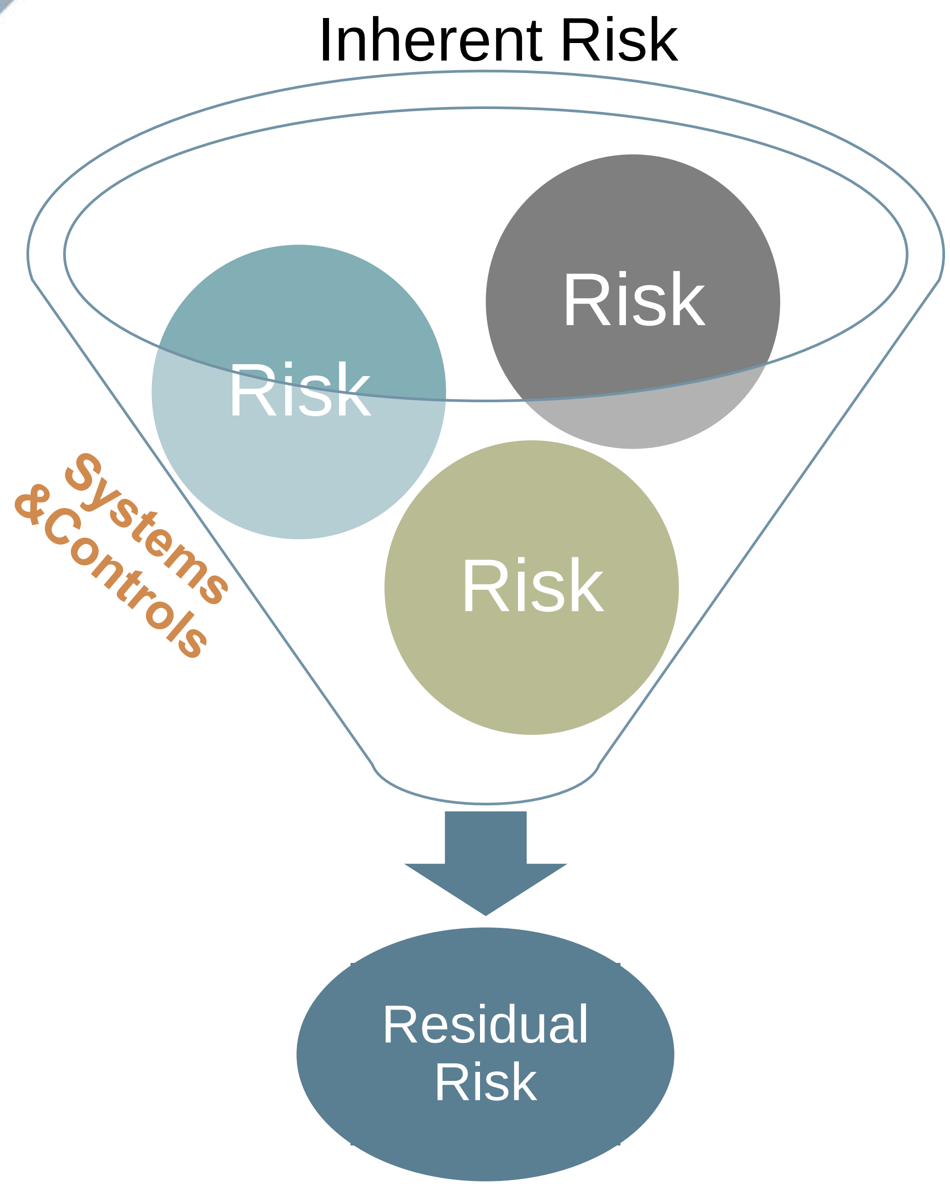
Monitoring whether the controls implemented are adequate and effective to mitigate and manage the risks as identified and assessed.

Entity wide AML/CTF/CPF risk assessment

- Accountable institutions must first conduct an entity wide AML/CFT/CFP risk assessment to identify the ML, TF and PF risks the accountable institution faces, before determining the controls required to mitigate the risk, which controls form part of the RMCP.
- Before the board approves the RMCP, the board must consider whether the RMCP adequately mitigates the ML, TF and PF risk, therefore the board must be satisfied that an entity wide AML/CFT/CFP risk assessment has been conducted, and all the relevant risk factors have been taken into account

Risk-based approach

Risk-based approach: inherent and residual risks



Risk management – identify, assess and implement methods to treat & manage risk

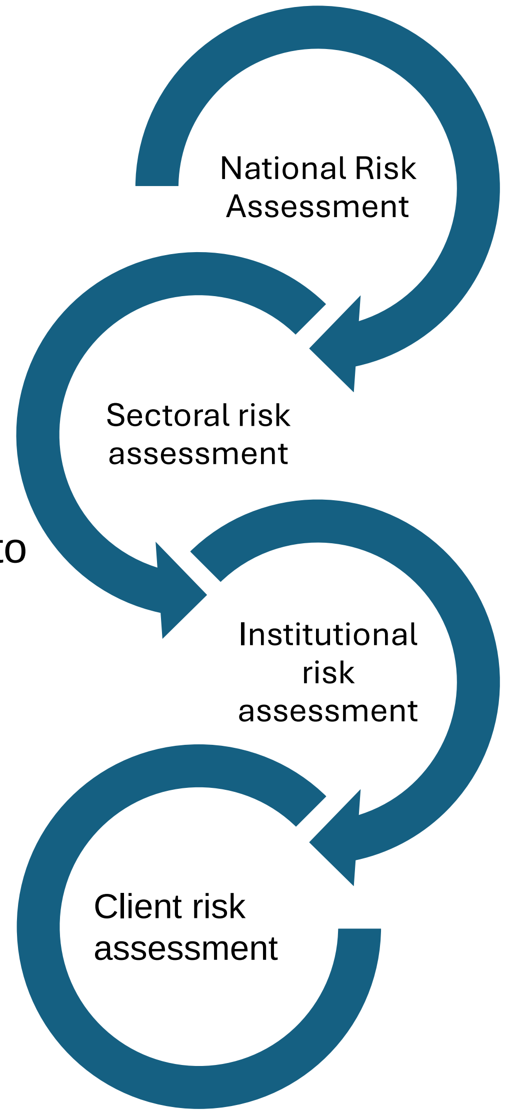
- Treatment of risk = systems and controls developed to manage the identified money laundering and terror financing risks i.e. clients and products
- Risk will be adequately treated = level of **residual risk** is acceptable & within the risk appetite of the accountable institution

Determine risk tolerance / risk appetite

- Aid in extent to which resources will be applied,
- Must have stance on level of tolerance towards certain risks, or avoid/terminate these risks
- I.e. Systems & controls (e.g. CDD, monitoring etc) are dependent on risk appetite

Risk-Based Approach: Risk assessments

- **National risk assessments** detail the ML/TF risks from an SA perspective. Could highlight areas of concern (e.g. Corruption)
- Sectoral risk assessments have been performed by the SBs based on feedback received from industries. The result aids in identifying areas of focus (e.g. abuse of cash or corporate structures)
- **Institutional risk assessments** allow for a risk framework to be implemented. Will aid in understanding what the ML/TF risks are that face your entity, what is the level of risk you are willing to take (risk tolerance) and what management and mitigation will be in place for the risks you chose to accept.
- **Institutional risks must be understood before client risk assessments can commence**
- These assessments should be included in the institution's RMCP. For further information regarding an RMCP, refer to Guidance Note 7A and PCC 53.
- Only from here, can you apply a **risk-based approach**



Money laundering, proliferation financing and terrorist financing TF risk assessment and rating

ML, TF and PF risk assessment and risk rating framework

Products and services	Delivery channels	Geographic area	Client type	Other factors
• Third-party payments • Cash/EFT • Cross-border flow of money • Duration of relationship/ transaction	• Direct relationship • Working through intermediary • Face to face or non-face to face	• SA/foreign jurisdiction • High-risk countries • Client confidentiality in foreign jurisdiction • Weak regulatory oversight	• Natural/legal person • Complex structures • Politically exposed • Prominence • Adverse information • Negative media • ML findings • Transactional pattern	• ML approach • Sanctions • Strategy of entity • Regulatory fines in similar industries • Learnings/typologies

ML/PF/TF Risk assessment and rating

Risk matrix – ENTITY-WIDE BUSINESS LEVEL **Illustrative only, not actual risk scores suggested by the FIC*

	Client	Products /services	Geographic factors	Delivery channel	Other	Overall risk
Trust creation unit	low number of high-risk clients	Registration of trust at Masters	Predominantly Northern Cape	Face to face meetings	No negative media reports	**Low**
Company creation unit	High number of high-risk clients (FPEP)	Registration of company	In Gauteng, JHB CBD – high level of crime	Non - face to face	Media reports – e.g., high levels of persons involved in predicate crime	**High**

Entity wide ML/PF/TF Risk assessment
Consider your business units?

Risk matrix – Entity wide risk assessment

- Consider the different business units in your institutions.
- Consider the different clients, products, delivery channels, and areas within which that business units operate?
- Consider what unique risks of money laundering, terrorist financing and proliferation financing that unit may face?
- Does the unit need enhanced monitoring due to heightened risks?
- Should you request additional information for clients of a certain business unit based on the heightened risks?
- What additional measures can be applied to mitigate the risk of being misused for money laundering, terrorist financing and proliferation financing?

ML/PF/TF Risk assessment and rating

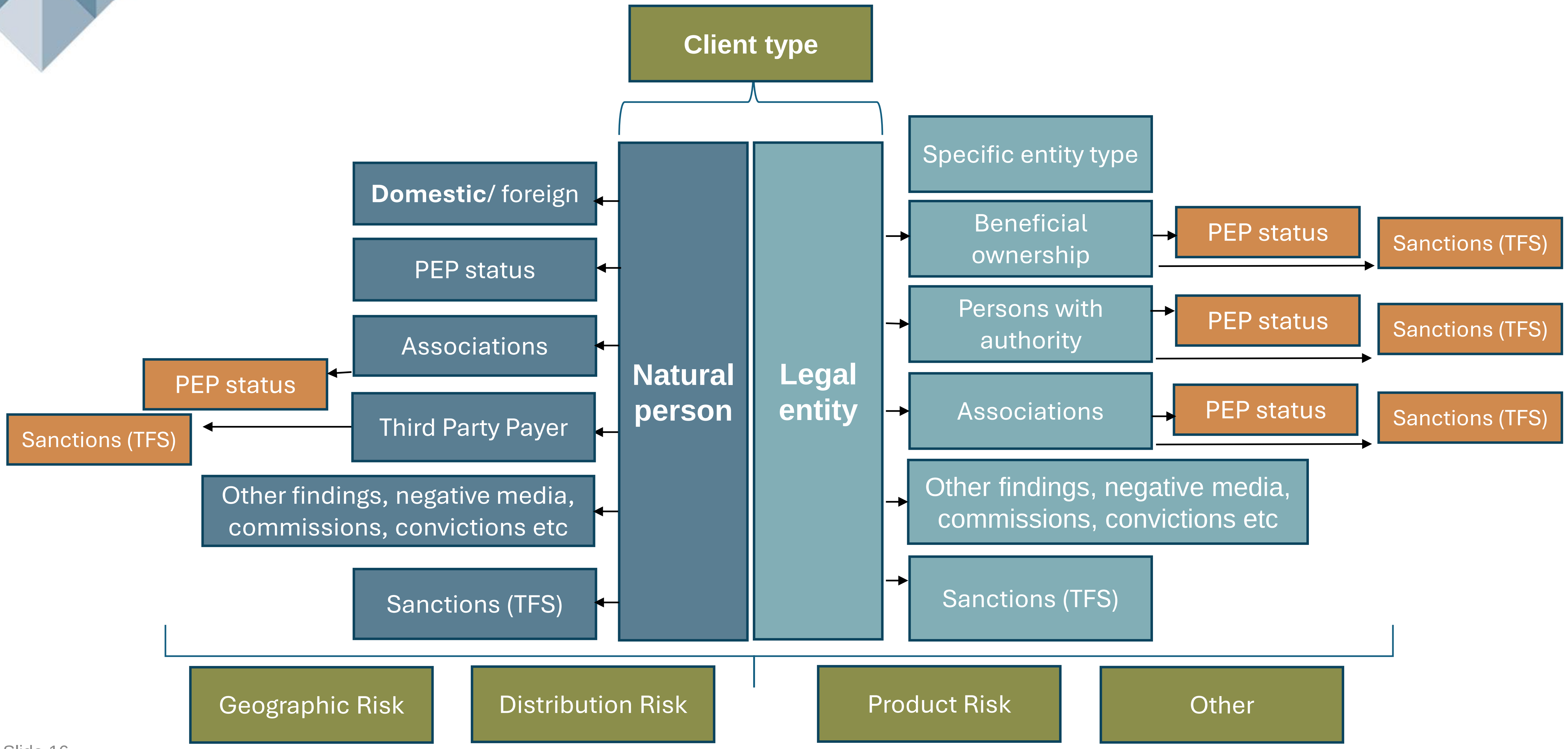
Risk matrix – CLIENT LEVEL

- For example, 5 factors, Higher risk (3), medium risk (2), low risk (1)
- Risk rate at onboarding and ongoing due diligence stages

Client type		Product type		Geographic area		Delivery channel		Other factors - Occupation/ sector		Overall rating
Natural person	1	Numerous trusts with links to companies	3	Foreign high-risk country	3	Non face to face	3	unemployed	3	13 high risk
Legal entity	2	Update beneficial ownership info	3	South Africa	2	Face to face	1	Technology sector	1	9 medium risk

**Illustrative only, not actual risk scores suggested by the FIC*

Client risk considerations



How to assess ML/PF/TF client risk and assign ratings?

Accountable institution lists Indicator and characteristic examples:	Accountable institutions Assessment of inherent risk – unpacking/understanding the risk Examples:	Rating assigned
Client type - natural person - employed	Where client is full-time employed, **historical trends** indicate lower possibility of ML/TF/PF risk	e.g., 1
Client type - legal person – company	**FATF guidance**, Trends indicate higher susceptibility to ML/TF/PF risks, beneficial owner?	e.g., 5
Client type - legal arrangement – trust	**International trends** indicate higher susceptibility to ML/TF/PF risks, beneficial owner. E.g., Panama papers	e.g., 6
Client type - legal person – company – dealing with tenders	Subject to more abuse by criminals, domestic trends indicate higher susceptibility to ML/TF/PF risks, **consider commission reports** etc.	e.g., 6
Client type – immediate family member of FPEP/High risk DPEP/PIP	Subject to more abuse by criminals, **international and domestic trends** indicate higher susceptibility to ML/TF/PF risks, risk similar to that of FPEP / high risk DPEP/PIP. See **FIC PCC 51, PCC 53**	e.g., 5
Client type - FPEP/High risk DPIP	**FATF guidance**, Trends indicate higher susceptibility to ML/TF risks	e.g., 6

** Illustrative only, not mandatory assessment considerations*

How to assess ML/PF/TF client risk and assign ratings?

Indicator example	Accountable institutions Assessment of inherent risk – unpacking/understanding the risk	Rating assigned
Client type - natural person – unemployed	Where client is unemployed, **trends** indicate lower possibility of ML/TF/PF risk, consider source of funds. E.g., **FIC published trends and typologies**	e.g., 3
Client type – natural person – TFS listed	**Section 26B** of the FIC Act, **PCC 44A -** Designated person or entity (this would be a clear indicator that the business relationship or single transaction poses a high PF risk)	e.g., 6 Freeze
Client type – legal person – Complex foreign entity	**Sector risk assessments** on company service providers indicates heightened risk	e.g., 5
Client type – Non-profit entity with international operations	**NPO risk assessment** indicates heightened risk of abuse for diverting funds to terrorist organisations	e.g., 5
Client type -	**TF National risk assessment** findings highlights certain client type to be high-risk from a terrorist financing perspective	e.g., 6
Client type – foreign national – North Korea	**PCC 44A -** National of or based in a geographic area that is subject to PF TFS (e.g., Consider the UNSCR 2397(2017), which requires member states to repatriate income earning North Koreans, with few exemptions)	e.g., 6

** Illustrative only, not mandatory assessment considerations*

Risk-based approach: Treatment of risk

Risk monitoring, mitigation and management – treatment of risk

- The control must be in proportion to the risk i.e.
  - **Higher ML and TF risk** – enhanced due diligence
  - **Medium ML and TF risk** – standard due diligence
  - **Lower ML and TF risk** – simplified due diligence

Risk will be adequately treated – level of residual risk is acceptable and within the risk appetite of the accountable institution.

ML/TF/PF Indicators

When assessing the ML/TF/PF risks posed by products and services risk, consider:

- To what extent does the product provide anonymity to the client?
- Does the product enable third parties who are not known to the institution to make use of it?
- Does the product allow for third party payments?
- Is another accountable institution involved in the usage of the product?
- Can the product be funded with cash or must it be funded only by way of a transfer to or from another financial institution?
- How easily and quickly can funds be converted to cash?
- Does the product facilitate the cross-border transfer of funds?
- Is the offering of the product subject to regulatory approval and/or reporting?
- What does the product enablement processes entail and to what extent does it include additional checks such as credit approvals, disclosure of information, legal agreements, licensing, regulatory approvals, registration, involvement of legal professionals, etc?

ML/TF/PF Indicators relating to products and services

When assessing the ML/TF/PF risks posed by products and services risk, consider:

- To what extent is the usage of the product subject to parameters set by the institution that e.g. value limits, duration limits, transaction limits, etc. or to what extent is the usage of the product subject to penalties when certain conditions are not adhered to?
- Is the usage of the product subject to reporting to regulators and/or to “the market”?
- Does historic transaction monitoring information indicate a lower or higher prevalence of abuse of the product for money laundering or terrorist financing purposes?
- What is the intended target market segment for the product for example:
  - “entry-level”, “retail” or “high net worth individuals”,
  - larger corporates, SME’s, SOC’s, etc, specific industries, sectors or professions
  - salaried vs self-employed individuals
  - minors

ML/TF/PF Indicators relating to products and services

When assessing the ML/TF/PF risks posed by products and services risk, consider:

- Is the usage of the product subject to additional scrutiny from a market abuse or consumer protection perspective?
- What is the time duration for the conversion of funds, property etc. through the usage of the product?
- Is the product an industry regulated product?
- Does the product allow for the flow of physical cash?
- Are there specific conditions that must be met or events that must happen for clients to have access to funds, property etc.?
- Does the usage of the product entail structured transactions such as periodic payments at fixed intervals or does it facilitate an unstructured flow of funds?
- What is the transaction volume facilitated by the product?
- Does the product have a "cooling off" period which allows for a contract to be cancelled without much formality and a refund of moneys paid?
- Are the products offered short term or longer-term contractual relationships?
- Do products require a payment from a same name account/facility to facilitate the opening of a product

RBA: Products and Services Risks

Accountable institution lists Indicator and characteristic examples:	Accountable institutions Assessment of inherent risk – unpacking/understanding the risk Examples:	Rating assigned
Product type – financing of companies	**FATF guidance**, Trends indicate higher susceptibility to ML/TF/PF risks. Subject to more abuse by criminals, etc. Company service providers involved in the raising of capital for new and existing companies should verify the origins of the capital, establish the identity of the investors in the case of potentially higher risk and verify the need and use of the capital/	e.g., 3
Product type – create and assist in managing complex, legal structures or shell companies	**FATF guidance**, Trends indicate higher susceptibility to ML/TF/PF risks due to the complexity of the structuring is aimed at and/or result in the true ownership of assets being hidden through various layers or legal structures. beneficial owner -	e.g., 3

Illustrative only, not mandatory assessment considerations

RBA: Products and Services Risks

Accountable institution lists Indicator and characteristic examples:	**Accountable institutions** **Assessment of inherent risk – unpacking/understanding the risk** **Examples:**	**Rating assigned**
Service type - Trustees or directors of companies	**FATF guidance**, Trends indicate higher susceptibility to ML/TF/PF risks. Subject to more abuse by criminals, etc. Company service providers acting in the capacity of independent trustees or directors, are required to obtain the necessary information about the nature of the transactions of the company, the natural persons or legal persons that are parties to transactions with the company and ascertain whether the transactions make economic or commercial sense.	e.g., 3
Product type – create and assist in managing different trust structures.	Inter Vivos Trust vs Special Trust and Testamentary Trust. An Inter Vivos Trust receives income regularly therefore susceptible to ML. Special/Testamentary Trusts on the other hand are either court ordered or activated upon the death of the owner of the will. These kinds of trusts have a low risk to ML because funds cannot be invested into them, there's only the withdrawal/transfer of funds.	e.g., 3

**** Illustrative only, not mandatory assessment considerations***

RBA: Delivery channel risks

Accountable institution lists Indicator and characteristic examples:	Accountable institutions Assessment of inherent risk – unpacking/understanding the risk Examples:	Rating assigned
Delivery type – non-face-to-face	**FATF guidance**, Trends indicate higher susceptibility to ML/TF/PF risks. Subject to more abuse by criminals, etc as this could be used to disguise the true identity and/or beneficial owner of the transaction. Such as where a “selfie” is used to open the account. AIs must be aware of the delivery channels they use to attract and deal with clients.	e.g., 3

***Illustrative only, not mandatory assessment considerations**

RBA: Delivery channel risks

Accountable institution lists Indicator and characteristic examples:	Accountable institutions Assessment of inherent risk – unpacking/understanding the risk Examples:	Rating assigned
Delivery type – using alternative types of onboarding, for example social media	It is important to conduct proper due diligence when using alternative methods to promote and/or onboard clients because it could lead to transacting with an anonymous/fictitious client.	e.g., 3
Onboarding client through an intermediary The product is only offered through intermediaries / The client does not interact with the institution directly	Where an intermediary is conducting the onboarding for customer due diligence, the accountable institution needs to ensure that the intermediary is identifying and verifying the client, as it could lead to transacting with a fictitious client, or a further layer of obstruction between the accountable institution and the client. For example conveyancing transactions with an estate agents, and a conveyancing firm, with the firm representing their client.	e.g., 3

Illustrative only, not mandatory assessment considerations

How to assess ML/PF/TF Geographic Risk, and assign ratings?

Accountable institution lists Indicator and characteristic examples:	Accountable institutions Assessment of inherent risk – unpacking/understanding the risk Examples:	Rating assigned
Geographic area type – country North Korea	**UNSC sanctions, FATF guidance**, **FIC PCC 44A** Trends indicate higher susceptibility to ML/TF/PF risks. Subject to more abuse by criminals, etc.	e.g., 3
Geographic area type – country Panama	**International and domestic trends** indicate higher susceptibility to ML/TF/PF risks, beneficial owner. Subject to more abuse by criminals, domestic trends indicate higher susceptibility to ML/TF/PF risks.	e.g., 3
Geographic area type – town – Johannesburg CBD	**Historical trends** indicate higher crime rate therefore higher susceptibility to ML/TF/PF risks, domestic trends etc.	e.g., 2
Geographic area type – country Iran	FATF Black-listed country	e.g., 3

** Illustrative only, not mandatory assessment considerations*

What sources can be used when assessing risk?

- Trends and typologies
- FATF Guidance on risk factors
- FIC guidance on a factor e.g., Guidance Note 7A
- FIC PCC 6A, PCC 49
- FIC sector risk assessment information
- International and domestic trends
- Accountable institutions knowledge of a product or client type or geographic area
- Open-source information, e.g., commission reports, media reports etc.
- Supervisory body advice
- Any other considerations

FIC Public Compliance Communication 49 Geographic area risk considerations

- The accountable institution could consider the below features or activities when reviewing a particular geographic area:
  - **AML/CTF/CPF regulatory framework**
  - The **quality** of the AML/CTF/CPF regulatory framework
  - **Perceived level of adherence** to compliance and enforcement of the AML/CTF/PF regulatory framework by accountable institutions
  - **Country membership** to an AML/CTF/CPF organization
  - **Perceived compliance** to AML/CTF/CPF regulatory framework and the quality of supervision by regulatory bodies;
  - **Perceived level of crimes**
  - **Perceived level of prosecutions**
  - **Perceived levels of bribery and corruption**

FIC Public Compliance Communication 49 Geographic area risk considerations

- Perceived levels of influence of the **abuse of public office** by criminal entities;
- **Secrecy and protection of information**, and access to information regulatory regimes;
- Perceived **tax havens**;
- Listing of a geographic location on **a sanction listing** eg UNSCR listing, as well as countries subject to restrictions such as trade or arms embargoes
- Proximity to geographic area, such as bordering geographic areas that may serve as **nodal points** for ML/TF/PF activities or states known to have a **sympathetic stance towards** ML/TF/PF activity;
- Countries with **porous borders** including sea borders
- **Efficiency of independent state agencies** in carrying out their respective mandates
- Perceived level, **activity or support of efforts aimed at undermining** AML/CTF/CPF measures and interventions; and
- Presence of **high- risk products** that may facilitate the movement of funds anonymously.

Guidance note 7A: Drafting considerations for an RMCP

- An accountable institution's RMCP must be commensurate with the size, complexity and the nature of the institution's business.
- This implies that the RMCP for an accountable institution which does not provide a wide range of products and/or services, or which does not deal with a diverse range of clients, could be relatively simple.
- Complex financial institutions which provide a wide range of products and services or that deal with a diverse range of clients would be expected to have a much more complicated and multi-faceted RMCP.

Guidance note 7A: Documentation considerations

- The RMCP documentation constitutes the identifiable and readily accessible information that comprehensively records the RMCP.
- The accountable institution must make the RMCP available to employees and also use it for training. Importantly, it would be the documentation provided to the FIC or other supervisory body, on their request, for examination purposes in terms of the FIC Act.
- RMCP documentation must reference related documentation that constitutes and enables the full implementation of the RMCP.
- Documentation that is not referenced in the RMCP is not considered to be part of the RMCP.

Guidance note 7A: Documentation considerations

- The accountable institution's RMCP documentation should also cover, among other aspects:
- Appropriate training on ML, TF and PF to ensure that employees are aware of and understand their legal and regulatory responsibilities and their role in handling possible criminal information or property and ML, TF and/or PF risk management.
- Appropriate provision for regular and timely information to the board of directors, senior management or person(s) with the highest authority relevant to the management of the institution's ML, TF and PF risks.
- Appropriate documentation of the institution's risk management policies, risk assessment methodologies and risk profile in relation to ML, TF and PF, including documentation of the institution's application of those policies.
- Appropriate descriptions of decision-making processes regarding different categories of customer due diligence and other risk management measures, including escalation of decision-making to higher levels of seniority in the accountable institution where necessary.

Guidance note 7A: Documentation considerations

- Appropriate measures to ensure that ML, TF and PF risks are escalated and considered in the day-to-day operation of the institution, including in relation to:

✓ The development of new products, services, delivery mechanisms, practices and technologies

✓ Taking on or onboarding of new clients

✓ Ongoing monitoring of business relationships

✓ Changes in the institution’s entity wide AML/CFT/CFP risk assessment profile

Guidance note 7A: Where the institution is operating in other countries

- Accountable institutions situated in South Africa and operating in foreign jurisdictions should also be aware of the local AML, CFT and CFP obligations in all jurisdictions where they operate. This should be reflected in the accountable institution’s RMCP document.
- Procedures should be in place to meet local AML, CFT and CFP obligations in each jurisdiction where an accountable institution operates.
- If there are conflicts between the South African and the foreign jurisdiction’s AML, CFT and CFP compliance requirements, and if the foreign jurisdictions requirements would result in a lower standard than in South Africa, the accountable institution must implement measures which meet the South African requirements.

Risk management & compliance programme Guidance note 7A and PCC 53

Guidance note 7A and PCC 53

Subject to updates in line with General Law (anti-money laundering and combatting terrorist financing) Amendment Act 2022

Annexure B: Example of an RMCP document template for DNFBPs

IMPORTANT TO NOTE

Annexure B provides a proposed template framework, which accountable institutions that are specifically DNFBPs as stated in paragraph 1.4 above must customise and enhance to suite the ML/TF/PF risk unique to the accountable institution's business.

It is vital to understand that Annexure B does not provide a ready-to-use RMCP, but merely a basic framework from which accountable institutions can build. The Centre **strongly cautions** against accountable institutions copying this document as is without changes.

Where an accountable institution has not customised the RMCP template, that accountable institution would be non-compliant with the FIC Act obligations as it would not be able to demonstrate that it has adequately identified, assessed, monitored, mitigated or managed their ML/TF/PF risks.

A reminder that an RMCP is a programme that consist of various controls that must be implemented and that needs to be documented. The template below can assist in how to describe a programme, and also serves to guide accountable institutions as to what their RMCP document should consist of.

Insert title i.e. RISK MANAGEMENT AND COMPLIANCE PROGRAMME FOR (insert accountable institution DNFBP name e.g., XYZ)

(DATE)

RMCP governance

1.1. The directors or senior management of XYZ include:

a. Y with the following role and responsibilities __________ (*e.g. review and approval of RMCP*)

b. Z __________ (*e.g. review and approval of RMCP*)

Compliance function

1.2. The compliance function at XYZ comprises:

FIC
Financial Intelligence Centre

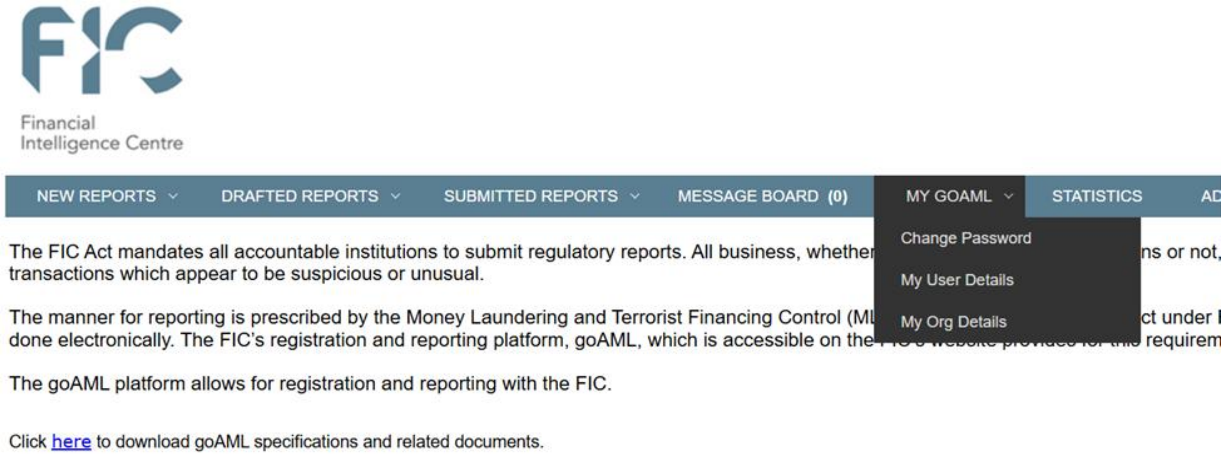
PUBLIC COMPLIANCE COMMUNICATION

PUBLIC COMPLIANCE COMMUNICATION No 53

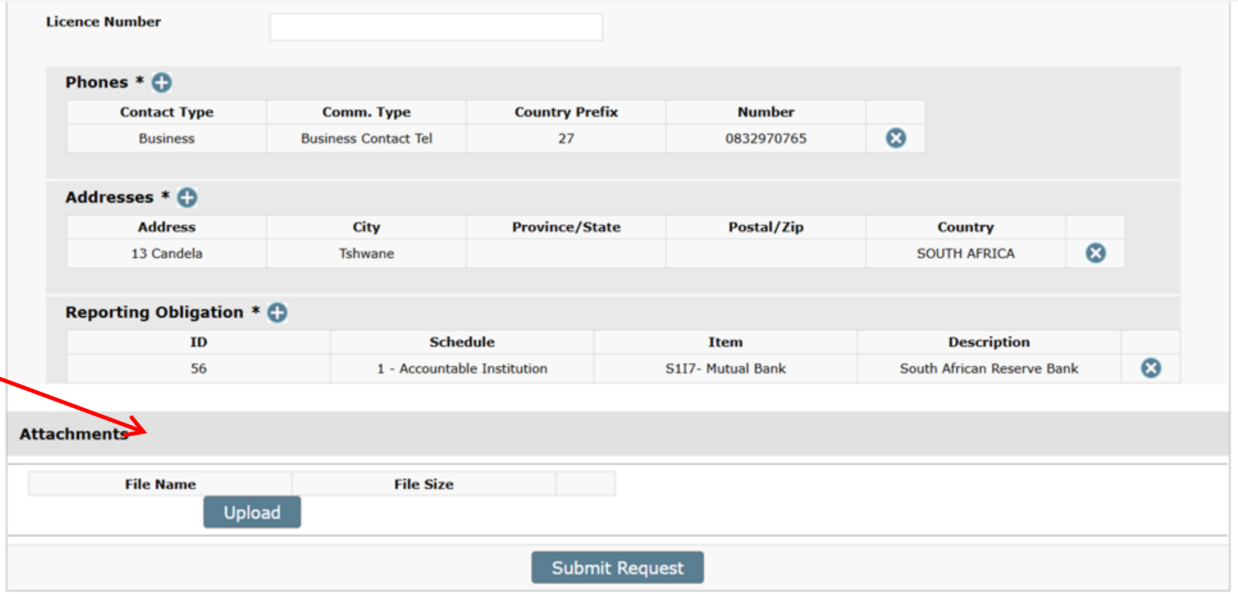
ON THE RISK MANAGEMENT AND COMPLIANCE PROGRAMME IN TERMS OF SECTION 42 OF THE FINANCIAL INTELLIGENCE CENTRE ACT, 2001 (ACT 38 OF 2001) FOR DESIGNATED NON-FINANCIAL BUSINESSES AND PROFESSIONS

RMCP Submission on GoAML

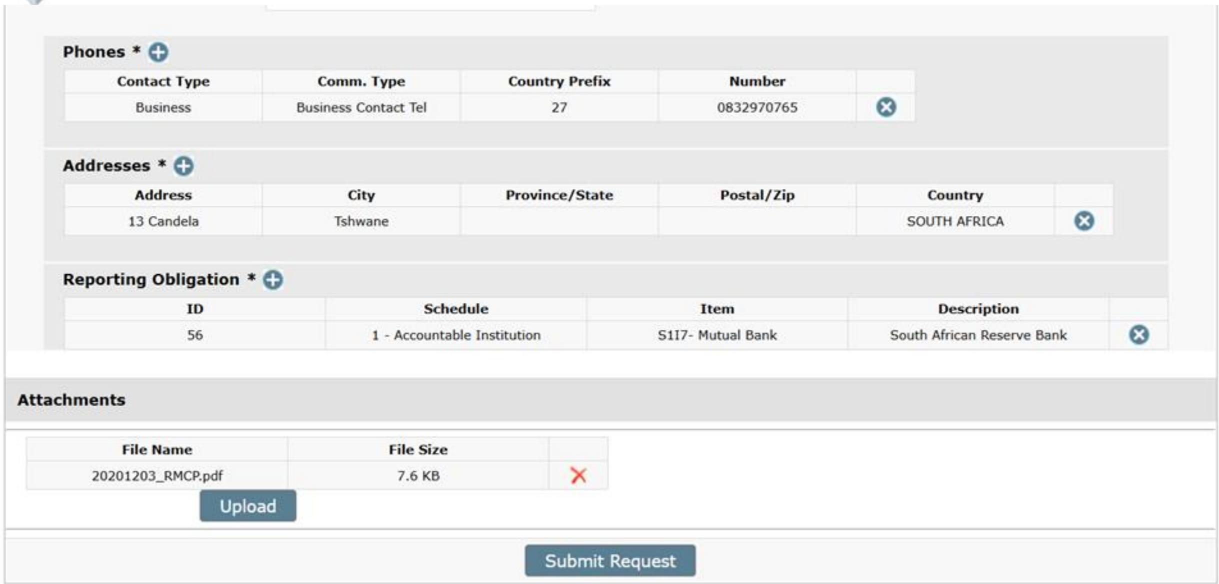
1) Log on to goAML, using the URL: https://goweb.fic.gov.za/goAMLWeb_PRD/Home
2) Click on the **“MY GOAML”** Dropdown Menu.
3) Click on **“My Org Details”**.



4) Scroll down to the **“Attachment”** section and click on the **“Upload”** button.
5) Browse to where you have saved your RMCP document on your computer and click on **“Open”**.



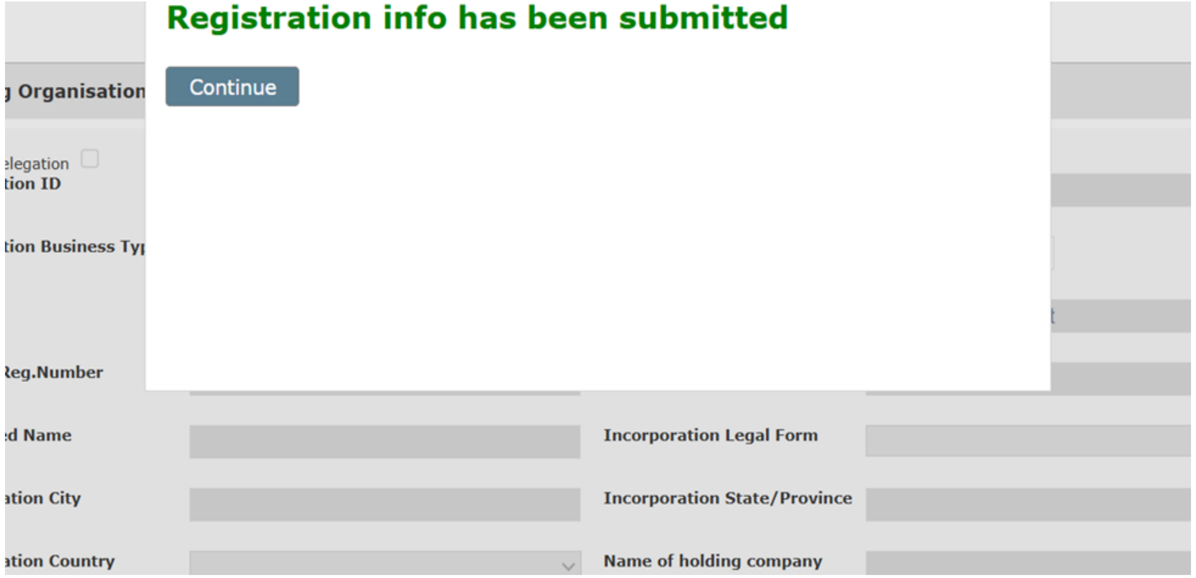
RMCP Submission on GoAML



6) Click on **"Submit Request"**.

NOTE:
Save the latest version of your RMCP document in PDF format on your computer with the following filename ***YYYYMMDD_RMCP.pdf (YYYYMMDD must reflect the date of approval of your latest RMCP).***
For example, 20250304_RMCP.pdf.

7) Click on **"Continue"** – which is the last step in your RMCP submission to the FIC.



Further information for Guidance Note 7A

Sector Risk Assessment: Accountants	✓ SRA Accountants
Public compliance communication 53	✓ PCC 53
Guidance Note 5C: Cash Threshold Reporting	✓ GN 5C
Guidance Note 7A	✓ GN 7A
Public compliance communication 6A: Trust and company service providers	✓ PCC 6A

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THANK YOU