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Private Bag X177, Centurion, 0046

T +27(0)12 641 6000

F +27(0)12 641 6251

Christopher.Malan@fic.gov.za

Christopher Malan, Compliance and Prevention

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Financial
Intelligence Centre

URGENT REMINDER FOR IDENTIFIED ACCOUNTABLE INSTITUTIONS TO REGISTER WITH THE FINANCIAL INTELLIGENCE CENTRE

The 90-day non-penalty window for various new and other identified accountable institutions to register with the Financial Intelligence Centre (FIC) closed at end of business on Monday, 20 March 2023. Amendments to Schedule 1 to the Financial Intelligence Centre Act, 2001 (Act 38 of 2001) (FIC Act), came into effect from 19 December 2022. The amendments included the requirement for new and other identified categories of persons that were added to the list in Schedule 1, to register with the FIC within 90 days of being added to the list.

It has come to our attention that **not all** identified accountable institutions in designated sectors, have as yet registered with the FIC as required. The items required to register include: item 1 as legal practitioners (inclusive of trust advocates), item 2 as trust and/or company service providers, item 11 as credit providers, item 19 as money or value transfer service providers, item 20 as high value goods dealers, including precious metals dealers (such as Krugerrand dealers) and precious metals and stones dealers (such as jewellers), item 22 as crypto asset service providers and item 23 as clearing system participants.

Accountable institutions that have not yet registered with the FIC in respect of all the items in which they conduct business, are currently non-compliant with the FIC Act and are required to immediately register with the FIC to avoid attracting increasing administration sanctions for non-compliance and late registration. It is important to note that some entities may be required to register more than once with the FIC, should they perform activities in more than one item as listed in schedule 1 of the FIC Act.

As communicated by the FIC and in media, registration with the FIC is compulsory for these sectors. Kindly follow this link for information on the requirement and how to register with the FIC <https://www.fic.gov.za/amendments/Pages/registeramendments.aspx>.

As new and designated categories are aware, South Africa was recently grey listed by the Financial Action Task Force (FATF). Registration with the FIC commences and enables the

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fulfilment of your regulatory reporting obligations, as well as other risk and compliance obligations with the FIC Act. Registration with the FIC is a foundational requirement in addressing the deficiencies identified by the FATF.

We require that all identified accountable institutions in the various designated sectors listed in this correspondence complete their outstanding registration as may be required under the abovementioned items in Schedule 1 to the FIC Act, before close of business on **Friday, 31 March 2023**, as this is the year end date recorded for reporting on the state of compliance with the FIC Act to the FATF.

The FIC reserves its right to issue the appropriate administrative sanction in respect of non-registration and late registration, as the circumstances may warrant.

Yours sincerely

Christopher Malan

CHRISTOPHER MALAN
EXECUTIVE MANAGER: COMPLIANCE AND PREVENTION
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