

KALLITO CASH SOLUTIONS (PTY) LTD
FICA COMPLIANCE POLICY MANUAL

(Issued under the Financial Intelligence Centre Act 38 of 2001, as amended)

Company Name: Kallito Cash Solutions (Pty) Ltd

Registration Number: 2023/723562/07

NCRCP Number: 22010

Physical Address: Unit 22, 02 Sand Olive, Arboretum, Richards Bay, 3900

Contact: 087 803 0082 | info@kallitocash.co.za | www.kallitocash.co.za

Effective Date: 23 October 2025

Approved By: Mxolisi Godfree Ntshangase (Managing Director & Compliance Officer)

1. PURPOSE

This policy establishes procedures and controls to ensure that Kallito Cash Solutions (Pty) Ltd complies fully with the Financial Intelligence Centre Act 38 of 2001 (FICA) and its regulations.

Objectives:

- Prevent and detect money laundering and terrorist financing.
- Verify the identity of clients before establishing a lending relationship.
- Maintain accurate records for regulatory and audit purposes.
- Report suspicious and unusual transactions to the Financial Intelligence Centre (FIC).

2. SCOPE

This policy applies to all employees, contractors, and representatives of KCS involved in client onboarding, loan processing, payments, collections, and record-keeping.

3. COMPLIANCE FRAMEWORK

KCS is classified as an Accountable Institution under Schedule 1, Item 11 of FICA (Credit Providers). Compliance is managed through controls including a Compliance Officer, CDD, record keeping, reporting, and training.

4. CUSTOMER DUE DILIGENCE (CDD)

Before granting any loan, KCS must obtain:

- Proof of Identity (Valid SA ID/Passport).
- Proof of Address (Utility Bill/Bank Statement <3 months old).

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- Proof of Income (3 payslips or bank statements).

- Signed Loan Application & POPIA Consent.

- Photo Verification (optional).

5. RISK-BASED APPROACH (RBA)

KCS applies proportional risk management:

- Low Risk: Employed local clients, standard CDD.

- Medium Risk: Self-employed, irregular income, enhanced verification.

- High Risk: Non-resident or suspicious behaviour, escalate to Compliance Officer.

6. REPORTING TO THE FIC

Reports to the Financial Intelligence Centre (via goAML):

- Suspicious Transaction Report (STR) within 15 days of detection.

- Cash Threshold Report (CTR) for cash transactions \geq R49,999 within 2 days.

7. RECORD KEEPING

All FICA and client records (physical or digital) must be retained for 5 years after the relationship ends.

8. STAFF TRAINING & AWARENESS

All employees must undergo FICA/AML training before handling client info and annual refreshers thereafter.

9. BREACHES & DISCIPLINARY ACTION

Failure to comply may result in disciplinary action, civil/criminal penalties, or NCR deregistration.

10. REVIEW & UPDATES

This policy is reviewed annually or when legislation changes. Approved by the Managing Director.

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Mxolisi Godfree Ntshangase

Managing Director & FICA Compliance Officer

Date: 23 October 2025