



BOLAND WINELANDS

BUSINESS NAME	Latjieskloof Beleggings (Pty) Ltd
TRADING AS	Seeff Boland Winelands
REGISTRATION NUMBER	1997/007630/07
BUSINESS ADDRESS	42 A Main Street, Paarl
BUSINESS EMAIL ADDRESS	bolandwinelands@seeff.com
ADDRESSES OF ADDITIONAL OFFICES	Listed at clause 1.41
FFC NUMBER	F109426

FINANCIAL INTELLIGENCE CENTRE ACT RISK MANAGEMENT AND COMPLIANCE PROGRAMME (RMCP)

MAY 2023

CLIENT FICA RISK RATING

In the event that this Assessment is automated, the automation will be implemented in line with the below questions and criteria

EMPLOYEE/AGENT DETAILS:	Nikita van Wyk
TRANSACTION DETAILS:	Erf 9772 Olifantskop
TRANSACTION VALUE:	R 6 450 000.00

SELLER/DEVELOPER/LANDLORD Paul James Joseph Rauch, 076 060 7502, paul@conferencedynamics.co.za

1. Nature of client		2. Strength of relationship		3. Origin of client		4. Location of client		5. Wealth Profile/Source of funds of the client	
Individual	1 X	New client	4	Unsolicited Service Request	4	Within general location of office	1 X	In line or below social status/occupation	1 X
Company/CC	4	Socially known client	2 X	Client request via social media	4	Outside normal operational area/border	2	Exceeds social status/occupation	2
Trust/Partnership	4	Regular or well known client	1	Prospect approached by business	1 X	Foreigner	3	Surprisingly high relative to social status/occupation	4
Represented by another	4	Family member of known client	2	Referral	2	Local or foreign, face- to-face verification	1	Income generated from Technology employment or business association	3
Listed or Public Company	2	Family member of regular client	1	Referral from business partner/another accountable institution	1	Local or foreign, no face-to-face with client	5	Unemployed	4
Alternative entity	3	Family member of agent or employee	2	Existing/Long standing client	1			Cannot determine	3
Estate Late	3					No direct contact with the heirs	3		



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					Direct contact with the heirs	1			6
Total		Total		Total	Total		Total		

BUYER/TENANT

1. Nature of client	2. Strength of relationship	3. Origin of client	4. Location of client	5. Wealth Profile/Source of funds of the client					
Individual	1	New client	4	Unsolicited Service Request	4	Within general location of office	1	In line or below social status/occupation	1
Company/CC	4	Socially known client	2	Client request via social media	4	Outside normal operational area/border	2	Exceeds social status/occupation	2
Trust/Partnership	4	Regular or well known client	1	Prospect approached by business	1	Foreigner	3	Surprisingly high relative to social status/occupation	4
Represented by another	4	Family member of known client	2	Referral	2	Local or foreign, face- to-face verification	1	Income generated from Technology employment or business association	3
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Alternative entity	3	Family member of agent or employee	2	Existing/Long standing client	1			Cannot determine	3
Estate Late	3					No direct contact with the heirs	3		
Total		Total		Total		Total		Total	

GRAND TOTAL



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	YES	NO
<p>VERY HIGH RISK</p> <p>1. Despite the above score, does the client's details appear on either the TFS or UN1267 list?</p>		
<p>HIGH RISK</p> <p>2. Is the total score above 20?</p> <p>3. Does the total value of the transaction exceed R8,000,000.00 in total?</p> <p>4. Is there more than R2,000,000.00 cash involved in the transaction (paid either via EFT or otherwise)?</p> <p>5. Is either or both of the clients a politically influential person or a local or foreign prominent person as defined in the PIP/PEP list?</p> <p>6. Is either or both of the clients an entity where the corporate vehicle's structure is multi layered and if so a. has the client supplied a full ORGANOGRAM of the ownership structure and financial structure of such company to your satisfaction?</p> <p>7. Was there a deposit of funds in the transaction with a request for their immediate transfer elsewhere?</p> <p>8. Was there an unwarranted and unexplained international transfer of funds during the transaction without any or little explanation?</p> <p>9. Is the transaction unnecessarily complex without the structure of the funding being completely clear?</p> <p>10. Has either or both of the clients in the transaction supplied vague or incomplete information about their proposed trading activities, and a reluctance to provide financial details?</p> <p>11. Has either or both of the clients <i>refused</i> to deal with THE BUSINESS in person or avoided video calls or such type of personal verification?</p> <p>12. Is there a connection to a country on the Grey-List, except South Africa - without the source of funds, industry of trade and occupation being completely clear with no concern?</p> <p>13. Is there a connection with a country which is known for its aversion to anti-proliferation financing, such as China, Russia, Egypt, India, Libya, Pakistan, Syria and Iraq <i>without</i> the source of the funds being clear to THE BUSINESS;</p> <p>14. Is there a connection of a FATF Black-Listed Country? (North Korea, Iran, Myanmar)</p> <p>15. Has either or both of the clients indicated dealings with dual-use goods, controlled goods subject to export control or complex equipment for which they lack the technical background?</p> <p>16. Is there involvement in complex trading with numerous third-party intermediaries in lines of business that are not linked to their stated business profile?</p> <p>17. Do either or both of the clients conduct transactions that suggest that they are acting as a money-remittance business or a pay-through account?</p> <p>18. Are any accounts being used for rapid, high-volume and / or complex payments, without any clear business reasons for such activity. Or are accounts being used that are dormant for a long time before sudden surges in activity?</p> <p>19. Is either or both of the clients affiliated to a university or research institution involved in the trading of</p>		



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<p>dual-use goods or goods subject to export control?</p> <p>MEDIUM RISK</p> <p>20. Is the total score below 20 but higher than 10?</p> <p>21. Is either or both of the clients an entity which where the shareholding or controlling shareholding remains unverified?</p> <p>22. Is the total value of the transaction more than R4,000,000.00 but less than R8,000,000.00 despite where the funds or how the funds are being paid?</p> <p>23. Do you feel that something in the transaction may be suspicious or unusual?</p> <p>24. Is there a concern about the ultimate beneficial ownership in the transaction?</p> <p>25. Has either or both of the clients provided insufficient, vague or suspicious information concerning the transaction or the funding in the transaction?</p> <p>26. Is either or both of the clients a foreigner who has not disclosed his/her/its industry of trade, occupation or source of income?</p> <p>27. Have you received unusually big credit card payments?</p> <p>28. Have payments been made by a third party, not named in the transaction, without a reasonable explanation?</p> <p>29. Have funds been received from any countries viewed by the UN as lacking transparency in terms of the money controls and who are known to be associated with war-crimes or terrorism activity?</p> <p>30. Was either or both of the clients born in any of the Grey listed countries, other than South Africa?</p> <p>31. Are any of the parties resistant to the supply of more detailed information requested by you?</p> <p>32. Are any of the parties aggressive when requested for further proof documents?</p>		
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RATING: * notes**

Low Risk

Should the file be rated MEDIUM, MEDIUM-HIGH OR HIGH MLTF & PF RISK, then notes are to be made below of the additional measures which are to be taken/were taken by THE BUSINESS in deciding whether to report or not to report the file to FIC.

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DATE	16 August 2023
EMPLOYEE / AGENT SIGNATURE	
MANAGER	