QUICKSURE

RISK MANAGEMENT PLAN - ANNEXURES

FOR

QUICKSURE COMMERCIAL (PTY) LTD

FSP NO: 16903

VERSION_20260201

ANNEXURES

RISK AREA: FAIS ACT & SUBORDINATE LEGISLATION	CONTROL ISSUES	RECOMMENDED ACTIONS / PROCESSES	RISK RATING	RESPONSIBLE PERSON	MONITORING / REVIEW FREQUENCY
License Categories: Sec 7: FAIS	The FSP must only provide advice and/or Intermediary Services on Financial products that fall within the license categories.	Check to ensure that each KI / Representative is licensed/authorised correctly in terms of categories vs product advising/selling. If not, then the correct categories are to be applied.	High	Key Individual	Ongoing
		Implement a KI? Representative Register	High	Key Individual	Ongoing
Subscription / Levies: Sec 8: FAIS	The FSP is obligated to pay all applicable levies to remain authorised to provide advice and/or intermediary services.	Ensure that all relevant levy invoices generated by the FSP are paid on the due date.	High	Key Individual	Annually
Advisory and/or Intermediary Services: Sec 7: FAIS	The FSP must provide financial services strictly within the framework of the financial product categories for which it is licensed.	Obtain the license and scrutinise it thoroughly.	High	Key Individuals	Ongoing
		The FSP must ensure that only authorised people provide advice and intermediary services.	High	Key Individuals	Ongoing
		The FSP must ensure that no financial services are rendered in respect of additional license categories until approval has been granted by the FSCA and the The relevant license has been updated.	High	Key Individuals	Ongoing
	Implementation of templates for the advice- giving process	Ensure that the following documents are implemented: - Disclosure Letter - Letter of Authority / Copy of License - Letter of Engagement / Broker Appointment - Needs Analysis - Risk Profile - Client Advice Record - Final Letter	High	Key Individual	Ongoing

Client Service Level Agreement: Sec 3(2)(1)(d): General Code of Conduct	Service Level Agreements / Contracts must be in place with all clients to properly manage the relationship.	Ensure that appropriate SLAs are concluded with every client.	Medium	Key Individual	Annually, / As or when required
Financial Products: Sec 4: General Code of Conduct	The FSP must only advise on and market products of approved product providers.	Ensure that a proper due diligence process is followed before new product providers are contracted.	Medium	Key Individual	Ongoing
	The FSP must have a mandate/contract with every product provider	Check on the license categories and how they Compared to the products that the FSP is selling.	Medium	Key Individual	Ongoing
		Maintain a contract file for all the product providers	Medium	Key Individual	Ongoing
RISK AREA: FAIS ACT & SUBORDINATE LEGISLATION	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW FREQUENCY**
Maintenance of Records: Sec 18: FAIS Sec 3(2): General Code of Conduct	Records must be kept of the following: - All written and verbal communication to clients relating to the rendering of financial services (including emails). - New Business - Surrenders / Replacements - Premature Cancellations - Non-Compliance Issues - Original Documents - Complaints	The FSP must have a procedure in place to ensure that a record is kept of all important documentation. The following must be implemented to assist with the maintenance of records: - New Business Register - Surrender / Replacement Register - Cancellation Register - Complaints Register - Receipts for original documents	High	Key Individual	Weekly
	The FSP must keep these records for 5 years after the termination of the product or after the rendering of the financial service	The FSP must ensure that the CO is consulted before documents are destroyed.	High	Key Individual	Weekly
		Ensure that files are kept in a fireproof safe, or all documents must be scanned and backed up regularly.	High	Key Individual	Ongoing
Client Exit Process: Sec 20: General Code of Conduct	Upon termination of services, the correct termination process must be followed.	Ensure that all pending/unfinished transactions are finalised.	Low	Key Individual	As and when
		Confirm with the client that the agreement is terminated and, where necessary, inform the product provider too.	Low	Key Individual	As and when
		Inform the client in writing of the termination of the service	Low	Key Individual	As and when

		Maintain the necessary records as prescribed.	Low	Key Individual	As and when
Fit & Proper Status of Key Individuals and Representatives: Sec 8: FAIS Sec 13: FAIS Board Notice 105 of 2008 Board Notice 106 of 2008-12-18	Any KI of an FSP must be approved by the Registrar before performing any management and/or overseeing functions, and the KI must ensure that a Representative is competent before being authorised to represent the FSP.	Ensure that all KIs have been approved by the Registrar before he/she can participate in management / overseeing functions.	High	Key Individual	Once Off / as and when
		Establish a process for informing the Registrar of changes in the KI's circumstances that will affect his/her fit and proper status within 15 days.	High	Key Individual	As and when
RISK AREA: FAIS ACT & SUBORDINATE LEGISLATION	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW FREQUENCY**
Fit & Proper Status of Key Individuals and Representatives: continues Sec 8: FAIS Sec 13: FAIS Board Notice 105 of 2008 Board Notice 106 of 2008-12-18		Perform quarterly checks on KIs and ensure that the Fit and Proper declaration is signed.	High	Key Individual	Quarterly
		Assessment and confirmation of the operational ability of the Key Individual.	High	Key Individual	Annually
		Financial records must be kept up to date and reflect financial soundness.	High	Key Individual	Ongoing
		KI's and Representatives must conform to the Determination for Fit & Proper requirements, 2008	High	Key Individual	Ongoing
		The Honesty & Integrity Declaration is to be signed by all KI's and Representatives.	High	Key Individual	Quarterly
Representative Mandates: Sec 13: FAIS Act Sec 20(c): General Code of Conduct	There must be a mandatory service contract entered into with all representatives of the FSP.	Ensure that all representatives are furnished with a certificate/disclosure letter confirming his/her status as representatives, and the KI accepts responsibility for the representative's actions.	High	Key Individual	As and when
		Ensure that if a representative's mandate of a representative is terminated, the client is informed about the termination, and also inform the client who will be servicing them.	High	Key Individual	As and when
Representative Mandates: Sec 13(3) & (4): FAIS	A register of representatives must be kept and updated with the FSCA.	Ensure that the representative register is updated within 15 days with the information that has changed.	High	Key Individual	Ongoing
Training Requirements of Representatives: Sec 13 (2): FAIS	The FSP must ensure that appropriate training is given to the representatives about products and compliance issues.	Ensure that a training register is kept to record all training activities.	Medium	Key Individual	Ongoing

FSP's Responsibilities to Representatives: Sec 13(2)(b): FAIS	The KI of the representatives must ensure that the representatives adhere to the provisions of the FAIS Act and the General Code of Conduct during the advice-giving process.	Ensure that the advice-giving process complies with the requirements of the General Code of Conduct.	High	Key Individual	Monthly
	Representatives must limit their advice-giving to the products that they are licensed for	Establish a process to ensure that the representatives only operate within their license categories	High	Key Individual	Monthly
RISK AREA: FAIS ACT & SUBORDINATE LEGISLATION	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW FREQUENCY**
Representatives Under Supervision: Board Notice 104 of 2008 Board Notice 106 of 2008	The supervision KI / Representative for a representative under supervision must be suitably qualified and competent, and a formal supervision program must be adhered to.	Appoint a qualified and competent supervisor: - Implement an agreed training and progress monitoring program. - Conduct regular performance appraisals, as well as continuously review and assess services rendered by the representative under supervision. - Disclose to clients that the representative is acting under supervision. - Implement a supervision process if the supervisor is a different person from the KI. - Ensure that a written supervision agreement is concluded with every representative.	Medium	Key Individual	Ongoing
Debarment: Sec 14: FAIS	Any representative of the FSP who no longer complies with the requirements in Sec 13(2)(a) must be debarred.	Establish an appropriate debarment process that includes the immediate withdrawal of authority.	High	Key Individual	Ongoing
		Establish a disciplinary process for acceptable labour law practices.	High	Key Individual	Ongoing
		Ensure that debarred KIs and representatives are removed from the register and advise the Registrar of The debarment within 30 days.	High	Key Individual	Ongoing
		Establish a process whereby the client is informed of a debarment.	High	Key Individual	Ongoing
		Ensure that any outstanding business is concluded	High	Key Individual	Ongoing

Professional Indemnity Cover: Sec 5(c): General Code of Conduct Sec 13: General Code of Conduct	The FSP must disclose to all clients whether PI Cover is held or not.	Obtain a copy of the certificate and monitor the expiry/renewal date, if applicable.	Low	Key Individual	Annually
Compliance Function: Sec 17(3): FAIS Sec 5: FAIS Regulations	Any FSP must establish and maintain a procedure to ensure compliance with the FAIS Act and subordinate legislation.	Ensure that the staff receive regular training on compliance functions.	High	Key Individual / Compliance Officer	Ongoing
		The appointed Compliance Officer must perform appropriate monitoring procedures and provide feedback/recommendations as stipulated in the SLA	High	Key Individual / Compliance Officer	Ongoing
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Custody of Financial Products / Client Funds: Sec 10: General Code of Conduct Sec 45: Short-Term Insurance Act Regulation 4 of the Short-Term Insurance Act	Any FSP that receives funds or financial products from clients must account for the funds or financial products.	Establish a procedure to ensure that written confirmation of receipt is issued when funds or financial products are received.	High	Key Individual	Ongoing
		Check that there is a separate account for client funds (take note of the exemptions concerning Short Term Insurance Premiums.	High	Key Individual	Ongoing
		Establish if the FSP receives short-term insurance funds and ascertain whether the FSP is authorised in terms of Sec 45 (STIA) and complies with the section, including an IGF guarantee.	High	Key Individual	Ongoing
		Establish whether the FDP receiving Short Term Insurance Funds utilises the services of a collection agency. If they do, obtain a copy of the contract and ensure that the collection agency is appropriately licensed.	High	Key Individual	Ongoing
		The assets of the FSP must exceed the liabilities at all times.	High	Key Individual	ongoing
	The FSP must keep monthly accounting records up to date.	Establish and maintain an appropriate accounting system	High	Key Individual	Monthly

Auditing and Financial Requirements: Sec 19: FAIS Act	The FSP must submit the Financial Statements to the FSCA within 6 months of the financial year-end.	Ensure that the appropriate financial statements are submitted to the FSCA when due.	High	Key Individual	Annually
Conflict of Interest and Noncash Incentives: Sec (b) & (c): General Code of Conduct, Sec 4(d): General Code of Conduct	The FSP must disclose all non-cash incentives, any other indirect consideration, or any situation that can give rise to a conflict of interest.	Implement a Conflict of Interest document. Ensure that this document includes a policy on how to deal with non-cash incentives.	High	Key Individual	Ongoing
		Implement a Gift Register.	Medium	Key Individual	Ongoing
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Conflict of Interest and Noncash Incentives: continues Sec (b) & (c): General Code of Conduct Sec 4(d): General Code of Conduct		Ensure that the disclosure document includes the following: - If the FSP holds more than 10% of any insurer's shares. - If the FSP received more than 30% commission from any insurer. - If the FSP received any non-cash incentives or indirect consideration from any other person. - The existence of any personal interest in the relevant service, or any circumstances that give rise to an actual/potential conflict of interest.	High	Key Individual	Ongoing
Client Complaints: Sec 16 – 19: General Code of Conduct	All FSPs are required to obtain a complaint resolution process and an appropriate procedure	Ensure that an appropriate complaints procedure has been implemented and disclosed to the clients.	High	Key Individual	Ongoing
		Ensure that a complaints register is opened and Maintained.	High	Key Individual	Ongoing
Advertisements: Sec 14: General Code of Conduct	All advertisements and marketing material must comply with the relevant provisions	Establish a process to ensure that all advertisements and marketing materials comply with the provisions of the General Code of Conduct.	Low	Key Individual	As and when
		Ensure that the Compliance Officer signs off on all new advertisements or marketing materials.	Low	Key Individual	As and when
Premature Cancellations /	The FSP must comply with the relevant	Establish and monitor a replacement/cancellation register.	High	Key Individual	Ongoing / as and when

Replacements: Sec 8(1)(d) and 8(3): General Code of Conduct	provisions about premature cancellations/replacements	Ensure that an appropriate RPAR is used in the event of any replacements	High	Key Individual	Ongoing / as and when
Direct Marketing: Sec 15: General Code of Conduct	The FSP / direct marketer must comply with all the relevant provisions of the FAIS Act and the General Code of Conduct	Implement an appropriate voice logging system	High	Key Individual	Ongoing
		Ensure that a quality assurance process applies to all direct marketing issues	High	Key Individual	Ongoing
		Implement a procedure for storing and retrieving recordings	High	Key Individual	Ongoing
		Ensure that pre-prepared documents are checked by the Compliance Officer	High	Key Individual / Compliance Officer	ongoing
RISK AREA: FAIS ACT & SUBORDINATE LEGISLATION	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW FREQUENCY**
Business Continuity and Succession Planning: Board Notice 106 of 2008: Sec 6 – Operational Ability	The FSP must have a business continuity and succession plan in place	Ensure that appropriate business continuity and succession planning arrangements are implemented.	High	Key Individual	Annually
Communication with Registrar: Sec 8: FAIS	The FSP must inform the Registrar timeously about all relevant changes within the business	Establish a process to ensure that the Registrar is informed timeously about changes to the information submitted during the license application process.	Medium	Key Individual	Ongoing
SLA with Third Parties: Board Notice 106: Sec 8 – Operational Ability	The FSP must have an appropriate SLA with any third party that is utilised to render administrative or system functions concerning rendering financial services	Ensure that an appropriate SLA specifies the agreed services, time standards, roles and responsibilities, and any penalties that might be applicable.	Medium	Key Individual	Ongoing
Segregation of Duties, Roles, and Responsibilities: Board Notice 106: Sec 8- Operational Ability	The FSP must ensure that there is a segregation of duties, roles, and responsibilities where such segregation is appropriate (where applicable)	Ensure that there is a defined process for the segregation of duties, roles, and responsibilities implemented (see SOP).	Medium	Key Individual	Ongoing
Access Rights and Data Security: Board Notice 106: Sec 8 – Operational Ability	The FSP must ensure that there are proper access right controls and data security on electronic data	Ensure that there is a defined process in place for access right controls and data security on electronic data (see SOP).	Medium	Key Individual	Ongoing

System Application Testing: Board Notice 106: Sec 8 – Operational Ability	The FSP must ensure that there is a proper system application testing (where applicable).	Ensure that there is a defined process in place to ensure proper system application testing (see SOP).	Medium	Key Individual	ongoing
RISK AREA: FINANCIAL INTELLIGENCE CENTRE ACT	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW FREQUENCY**
FICA Internal Rules: Sec 42: FICA	The FSP is obligated to implement an appropriate set of internal rules.	Ensure that FICA Internal Rules are implemented.	High	Key Individual	Ongoing
		Provide copies to all staff members.	High	Key Individual	Ongoing
Client Due Diligence: Sec 21: FICA	Proper due diligence must be applied to all new clients taken on per the provisions of FICA and the Regulations.	Obtain appropriate FICA declarations from new clients.	High	Key Individual	Ongoing
		Obtain proof of employment.	High	Key Individual	Ongoing
Client Verification: Sec 25: FICA Regulations	The FSP must verify relevant client information as per FICA.	Establish a process to ensure that the required Documentation is obtained from all active clients as per the FICA Internal Rules	High	Key Individual	Ongoing
Recordkeeping: Sec 22 – 26: FICA Sec 26: FICA Regulations	The FSP must ensure that proper recordkeeping is in place according to the provisions of FICA.	Ensure that records will be kept for 5 years after the termination of the product or after the rendering of the financial service. If the records are stored by a third party, the FIC must be informed.	High	Key Individual	Ongoing
Source of Funds Verification: Sec 21(3): FICA Regulations	The FSP must take reasonable steps to establish any client's source of income	Ensure that a process is implemented to establish the source of a client's funds.	High	Key Individual	Ongoing
		Implement a source of funds register.	High	Key Individual	ongoing
Staff Training: Sec 43: FICA Internal Rules	The FSP is obliged to give training to staff on all relevant provisions of FICA	Establish a process that will ensure that all staff receive the relevant training.	Medium	Key Individual	Annually
		Ensure that a Money Laundering Officer is appointed (preferably the KI of the FSP).	Medium	Key Individual	Annually
RISK AREA: INCOME TAX ACT	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW FREQUENCY**
Record Keeping	The FSP must keep all income tax records safe from destruction for 5 years	Consider implementing a process for scanning / appropriate backups of all relevant documentation.	Medium	Key Individual	Monthly
VAT	The FSP must keep all VAT records safe from destruction for 5 years.	Consider implementing a process for scanning / appropriate backups of all relevant documentation.	Medium	Key Individual	Monthly

Submission of Returns	The FSP must timeously submit tax and VAT Returns.	Establish a procedure that will ensure the timely submission of VAT and tax returns.	Medium	Key Individual	Annually / Every 2 months
SK AREA: BASIC CONDITIONS OF EMPLOYMENT ACT	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW FREQUENCY**
Staff Employment Contracts	The FSP must have an employment contract in a place with all the employees.	Ensure that appropriate written employment contracts are in place and concluded with all employees.	High	Key Individuals	As and when
Employment Terminations	The FSP must have a proper procedure for the termination of employment in place.	Establish a process that will ensure the correct procedures are followed when employment is terminated.	Medium	Key Individual	As and when
		Establish an appropriate process for disciplinary hearings of Employees.	Medium	Key Individual	As and when
RISK AREA: INFORMATION TECHNOLOGY	**CONTROL ISSUES**	**RECOMMENDED ACTIONS / PROCESSES**	**RISK RATING**	**RESPONSIBLE PERSON**	**MONITORING / REVIEW REQUENCY**

Recordkeeping of Data & Transactions	The FSP must have a documented policy about electronic recordkeeping, data integrity, backups, and electronic communication.	Establish a policy document that provides for the following: - All electronic records are to be easily accessible and readily reduced to print. - All business processes and electronic workflow procedures. - Ensure that a confidentiality agreement is concluded with clients when appropriate. - Confidentiality clauses must form part of staff employment contracts and representative mandates. - Regular backups must be made of electronic records and emails. - Backups must be tested to ensure that information was correctly backed up and that it can be easily retrieved. - Backups should be stored off-site, and they must be easily accessible. - Where the IT function is outsourced, it is advisable for a staff member to be trained in terms of emergency backups, information retrieval, etc. - Appropriate virus protection and firewall programs are included in the contract from the internet service provider. - Email correspondence must include a disclaimer as well as the information required in terms of FAIS.	High	Key Individuals	Ongoing