

December 14, 2023

NBFIRA 3/3/5-II (53)

To: AML/CFT Compliance Officers/Principal Officers - NBFIs

URGENT ACTION REQUIRED: IMPLEMENTATION OF UNITED NATIONS SANCTIONS LISTS DURING THE HOLIDAY SEASON

The Non-Bank Financial Institutions Regulatory Authority (NBFIRA) would like to emphasize the critical importance of maintaining robust mechanisms to receive and promptly act upon United Nations Sanctions lists during the holiday season.

It is imperative to recognize that financial crime is a dynamic threat, and criminals do not adhere to holiday schedules. In fact, historical data suggests an increased likelihood of illicit activities during festive periods when vigilance might be compromised due to reduced staffing levels and increased transaction volumes.

To safeguard the integrity of the financial system, NBFIRA hereby directs all Non-Bank Financial Institutions (NBFIs) to reinforce and enhance their procedures for monitoring and responding to UN Sanctions lists. This includes but is not limited to:

1. Ensuring real-time integration of UN Sanctions lists into your monitoring systems.
2. Conducting regular training sessions for relevant staff to stay abreast of the latest developments in sanctions regimes.
3. Establishing a dedicated team or point of contact responsible for immediate action upon receiving updates or alerts related to sanctioned entities.
4. Conducting thorough customer due diligence, especially during the onboarding process and when processing transactions with potential high-risk counterparties.

All NBFIs are urged to remain vigilant and report any suspicious activities/transactions to the Financial Intelligence Agency promptly. The cooperation of each stakeholder is crucial in maintaining the integrity of our financial system and fulfilling our commitment to combating financial crime.

Your cooperation in implementing and reinforcing these measures is vital in ensuring the continued effectiveness of our anti-money laundering, countering the financing of terrorism and proliferation and sanctions compliance efforts.

Thank you for your attention to this matter.

Sincerely

Signed
Mooketsi Ramanteba
Director- AML/CFT