

10th ANNIVERSARY



Annual Report 2018

NBFIRA

Non-Bank Financial
Institutions Regulatory
Authority





10th Anniversary

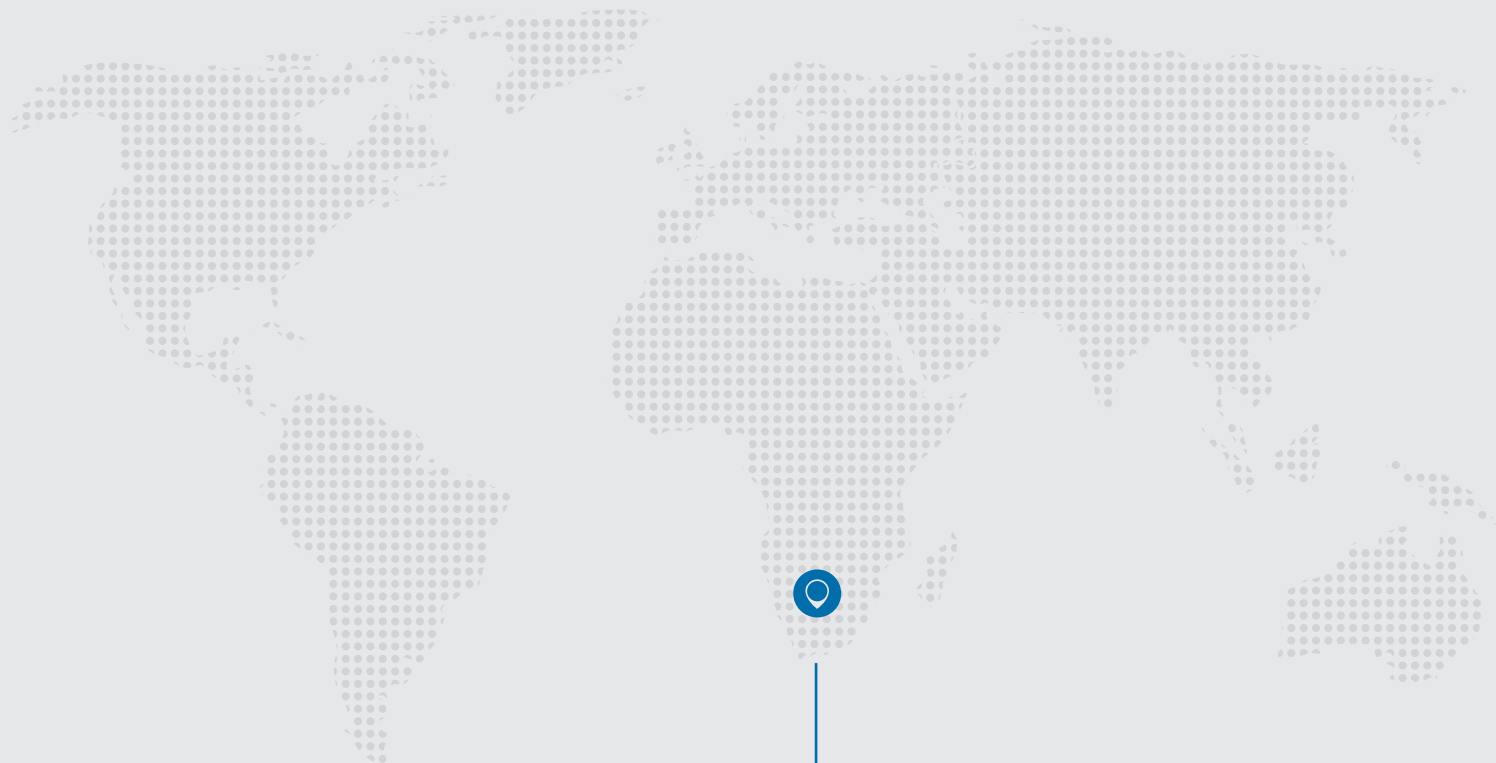
Preamble

The Non-Bank Financial Institutions Regulatory Authority (NBFIRA), also known as *the Regulatory Authority* is required under Section 34 of the NBFIRA Act, 2016 (CAP 46:08) to publish an Annual Report for its financial year.

The 2018 Annual report is published in fulfilment of the statutory requirements and highlights *the Regulatory Authority's* financial and operational performance for the financial year 2017/18. Financial performance of regulated entities is however based on the audited financial statements for the calendar year ended December 31, 2017. Historical data is reported for purposes of emphasis of developments pertaining to the review period.

2018
Annual Report
is available @
www.nbfira.org.bw

Our Geographic Location





Abbreviations used in the Annual Report

AML/CFT	Anti-Money Laundering/Combating the Financing of Terrorism
AUM	Assets Under Management
BDC	Botswana Development Corporation
BPOPF	Botswana Public Officers' Pension Fund
BSE	Botswana Stock Exchange
CISNA	Committee of Insurance, Securities and Non-Banking Authorities
CIU	Collective Investment Undertakings
CLI	Credit Life Insurance
CMI	Capital Market Intermediaries
CSDB	Central Securities Depository (Botswana) Pty Limited
DPF	Debswana Pension Fund
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group
GDP	Gross Domestic Product
IAIS	International Association of Insurance Supervisors
IFRS	International Financial Reporting Standards
IFSC	International Financial Services Centre
IMF	International Monetary Fund
IOPS	International Organization of Pension Supervisors
IOSCO	International Organization of Securities Commission
IT	Information Technology
KYC	Know- Your- Customer
MVAF	Motor Vehicle Accident Fund
ML	Money Laundering
NRA	National Risk Assessment
NBFI	Non-Bank Financial Institution
NBFIRA	Non-Bank Financial Institutions Regulatory Authority
RBSS	Risk Based Supervisory System
SADC	Southern African Development Community
SIBs	Securities Infrastructure Businesses
TF	Terrorist Financing

Glossary of terms

Asset manager: *means* a person who, under an agreement with another person, applies assets of the other person by way of investment, whether the asset manager makes those investments in its own name or not but does not include a custodian or a trustee.

Administrator of a retirement fund: *means* a person who provides administration or similar services to the fund.

Beneficiary fund: *means* a fund which is established with the object of receiving, administering, investing and paying benefits on behalf of beneficiaries.

Central securities depository: *means* a facility for the deposit of securities, clearing and settlement of securities transactions, whether physically, electronically or otherwise.

Collective Investment Undertaking: *means* an arrangement, where the principal object of which is the collective investment of its funds in real or personal property of whatever kind, including securities and other liquid financial assets, with the aim of giving its members, or unit holders the benefit of the result of the management of its funds and, subject to any prescribed exemptions, spreading investment risks; and subject to any prescribed exemptions the units of which are, at the request of holders, purchased, directly or indirectly, out of those undertakings assets. Such an undertaking may be constituted as – a unit trust; or an investment company with variable capital whose articles provide that – the actual value of the paid up share capital of the company shall at all times be equal to the net asset value of the company; and the shares of the company shall have not par value.

Custodian: *means* a person who holds property of another person for safekeeping.

Finance or leasing company: *means* a body corporate that provides loans, advances or leasing products, but does not include a bank or a deposit taking institution.

Friendly society: *means* an association of persons established with no share capital for the purpose of aiding members of the association or their dependents, being an association that does not employ a person whose main occupation is canvassing for members of, or collecting contributions or subscriptions for, the association.

Insurance agent: *means* a person who solicits applications for insurance, collects monies by way of premiums and acting in accordance with his agency agreement may bind the licensed insurer for whom he acts in the issuance of insurance cover.

Insurance Broker: *means* persons, who acting with complete freedom as to their choice of undertaking, and for commission or other compensation and not being an agent of the insurer, bring together, with a view to the insurance or reinsurance of risks, persons seeking insurance or reinsurance and insurance or reinsurance undertakings, carry out work preparatory to the conclusion of contracts of insurance or reinsurance, and, where appropriate, assist in the administration and performance of such contracts, in particular in the event of a claim.

Insurer: *means* a person carrying on an insurance business, otherwise than as a broker or agent, and includes, an association of underwriters.

International Insurance Firm: *means* an undertaking which carries on international insurance business and includes an insurance manager, a principal insurance representative and an insurance agent.

Investment Adviser: means a person who gives advice on the placement of monetary resources into the creation or acquisition of assets as specified by *the Regulatory Authority*, including the purchase of real and personal property and securities.

Management Company for a Collective Investment Undertaking: *means* an incorporated body responsible for the establishment, promotion, management and administration of a collective investment undertaking as laid down in the Collective Investment Undertaking Act (1999) and regulation or in any other conditions prescribed by the Minister, after consultation with *the Regulatory Authority*.

Member of the Insurance Industry: *means* an insurer, reinsurer, broker, agent, insurance surveyor, a risk manager, a loss assessor, a loss adjuster or a claims settlement agent whether or not licensed under the Insurance Industry Act (1987).

Micro Lender: *means* a person who advances loans to persons, where the loans do not exceed a prescribed amount, but does not include a person licensed in terms of the Banking Act or the Building Societies Act.

Pension Fund: *means* any fund of which, its principal object is to provide for the payment of a pension to a person, who is or has been a member of the fund, on his retirement.

Preservation Fund: *means* a pension or provident funds into which the accrued funds benefits of employees who leave the service of the employer due to dismissal (including retrenchment), or resignation, or in the event of the dissolution of the employers pension and provident fund, may be invested.

Provident fund: *means* a fund which is not a pension fund, which permits a person who is or has been a member of the fund, on his or her retirement, to take his or her benefits as a cash lump sum.

Risk Based Supervisory Model: *means* a forward looking approach designed to assist the regulator to allocate its resources more effectively, prioritising supervision to those firms presenting greatest risk.

Securities Broker/Dealer: *means* a member of a securities exchange who - carries on the business of purchasing and selling or purchasing or selling listed securities on behalf of other persons; regularly purchases and sells or purchases or sells listed securities on his own behalf; and trades in commodities.

Securities Exchange: *means* a market, exchange, place or facility that provides for bringing together, on a regular basis, buyers and sellers of securities to negotiate or conclude sales of securities.

Trustee of a Collective Investment Undertaking: *means* a person or body of persons who meets the qualifying conditions set out in the Collective Investment Undertakings Act (2002), is a party to a trust deed which establishes a unit trust scheme, is intended under the terms of the trust deed to stand possessed of the deposited property of the unit trust scheme upon trust to the unit-holders in proportion to the number of units held by them respectively, and holds the deposited property as a single common fund, no unit of which shall confer any interest or share in any particular part of the deposited property and in relation to a collective investment undertaking may also include where the content so requires, a custodian.

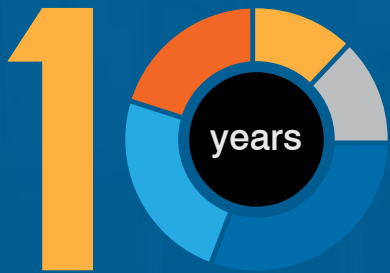
Trustee of a retirement fund: *means* a board member of a fund.

Multi-Employer (Umbrella Funds): *means* a fund which is established for the benefit of employees of different employers who are not associated employers.

Financial Group: *means* a group of companies under common control, comprised of one or more prudentially regulated non-bank financial institutions and their subsidiaries.

Financial Services Laws: *means* any of the following – NBFIRA Act, Insurance Industry Act, International Insurance Act, The Retirement Funds Act, Botswana Stock Exchange Act, Part XVI of the Income Tax Act, so far as it relates to non-bank financial institutions, The Securities Act, A law that declares itself as a financial services law for the purposes of this definition or such legislation as the Minister may, by Order, prescribe.

Umbrella Act: *means* The Non-Bank Financial Institutions Regulatory Act (2016)



“Continuing to do more; A decade of financial stability”



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MANDATE

The Regulatory Authority derives its mandate to regulate and supervise the non-bank financial institutions (NBFIs) from Section 4 of the NBFIRA Act, 2016 (CAP 46:08). The principal objective of **the Regulatory Authority** is to foster the following:-

- Safety and soundness of the NBFIs;
- The highest standards of conduct of business by the NBFIs;
- Fairness, efficiency and orderliness of the Non-Bank Financial sector;
- Stability of the financial system; and
- Reduction and deterrence of financial crime.

VISION, MISSION AND VALUES

To support its fundamental and principal objective, **the Regulatory Authority** subscribes to the following vision, mission and values statement in order to embrace a culture of a high performance organization.

VISION

To be an efficient and effective regulatory and supervisory authority in line with international best practices.

MISSION

To regulate and supervise the Non-Bank Financial Institutions for the purpose of contributing towards financial stability.

VALUES

Integrity

Adherence to the highest ethical standards.

Transparency

Openness and frankness in operations.

Fairness

Consistent promotion of equal treatment in dealings with all stakeholders.

Accountability

Responsibility to stakeholders.

Diligence

Thoroughness and persistence in the execution of duties.

The Regulatory Framework for the NBFi Sector

The legislative framework governing the operations of both **the Regulatory Authority** and the regulated NBFIs is known as the “financial services laws”. The NBFIRA Act (2016) is the umbrella Act of the financial services laws for regulation of the NBFi sector. The NBFIRA Act (2016) prescribes the operations, responsibilities and accountabilities of **the Regulatory Authority**, including corporate governance, staffing, finances, and reporting to stakeholders. It also

provides a comprehensive licensing regime for supervised entities and provides **the Regulatory Authority** with powers to remedy imprudent practices, unethical conduct, and contraventions of the law.

The regulated NBFIs and activities in Table 1 below are listed in Section 2 of the NBFIRA Act (2016).

Table 1: Financial Services Laws and their application to the Regulated NBFIs

Umbrella Act - The Non-Bank Financial Institutions Regulatory Authority Act, 2016 (Cap 46:08)		
Name of the Industry Act	Supporting Rules and Regulations	Types of NBFIs
INSURANCE INDUSTRY		
Insurance Industry Act (1987).	Insurance Industry Regulations (1992); Insurance Prudential Rules (2012).	Re-insurer; Insurer; Insurance Broker; Insurance Corporate Agent and Representatives (natural persons)
International Insurance Act (2008).		Global Insurance Firm Medical Aid Funds
RETIREMENT FUNDS INDUSTRY		
Retirement Funds Act (2014). Part XVI of the Income Tax Act.	Pensions Prudential Rules, 2012; Retirement Fund Regulations (2017)	Pension or Provident Funds; Trustees of Pension or Provident Funds; and Pension Fund Administrators
CAPITAL MARKETS INDUSTRY		
Securities Act (2014)	NBFIRA Commodities Exchange Licensing Regulations (2008); Securities (Institutions Licensing) Regulations (2017) Securities (Persons Operating a securities infrastructure business) regulations (2017)	The operator of a securities exchange; A person operating a central securities depository (CSD);and A securities Dealer/Broker International Financial Services Centre (IFSC) Accredited NBFIs A trustee of a collective investment undertaking; A collective investment undertaking that is an investment company with variable capital; A person operating a collective investment undertaking other than one described above; A custodian; Management Company for a collective investment undertaking (MANCO); An Asset Manager; and Investment Adviser.
Botswana Stock Exchange Act (1994). Income Tax Act Part XVI. Collective Investment Undertaking Act (2001).	NBFIRA Market Intermediaries Licensing Rules(2012); NBFIRA Securities Business Corporate Governance Rules (2012) CIU Regulations; NBFIRA Market Intermediaries 'Conduct of Business Rules (2012) NBFIRA Persons Operating a Securities Infrastructure Business Rules, (2012)	
LENDING ACTIVITIES INDUSTRY		
The Collective Investments Undertakings Act (2001).	Micro Lending Regulations (2012)	Micro Lenders; Finance or Leasing Companies

Note: Other laws applicable to all NBFIs include, inter alia, the Companies Act, the Income Tax Act, the Financial Intelligence Act, Competition Act, Financial Reporting Act and their supporting regulations.



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It is an honour and a privilege to assume this responsibility at a time when **the Regulatory Authority** is celebrating an exciting milestone of 10 years in existence.

Chairperson's Report

During the 2017/18 financial year, Mrs. Mmatlala Dube and Dr. Tebogo T.K. Matome, being the Chairperson and Vice Chairperson, respectively, retired as Board members of the Non-Bank Financial Institutions Regulatory Authority, also known as **the Regulatory Authority**. Having assumed the Vice Chairperson position in November 2017, I also acted as Board Chairperson to the end of the financial year under review.

It is thus an honour and a privilege for me to assume this responsibility at a time when **the Regulatory Authority** is celebrating an exciting milestone of 10 years in existence. The non-bank financial sector is counted amongst significant contributors to the economic growth of Botswana, outside the mining sector. As this chapter closes, the Board and Management reflect upon **the Regulatory Authority's** 10-year regulation and supervisory journey in a supplementary publication annexed to this statutory annual report.

I therefore present, on behalf of the Board of Directors, the 2018 special issue of the annual report of **the Regulatory Authority**. The statutory annual report is prepared in accordance with the provisions of Section 34 of NBFIRA Act (2016).

Strategic Plan 2016 - 2021

The year 2017/18 marks the second year of the implementation of **the Regulatory Authority's** strategic plan covering the years 2016 - 2021. The Board continued to drive its strategic objectives of building capacity to implement its risk based supervisory approach which is more pre-emptive and pro-active in identifying and mitigating emerging risks. To that end, **the Regulatory Authority** strengthened its effectiveness by improving its risk management, enforcement of compliance to prudential limits, prudent market conduct and the anti-money laundering and the combatting of financing of terrorism (AML/CFT) functions. For the period under review key deliverables under the current strategy were, inter alia, ensuring a robust and flexible non-bank financial market, improvement of regulation and supervision by continuous development of legal frameworks and contributing effectively to financial stability.

Financial Performance

The Regulatory Authority recorded an increase in the operating deficit to P6.5 million in 2017/2018 financial year from a deficit of P0.3 million in 2016/2017. This was as a result of an increase in operational costs by 17% in the year under review. However, total revenue increased to P70 million compared to P65 million recorded in the previous year. This was underpinned by a combination of restructuring of the model of levy rates and inclusion of new sectors in the collection of levies.

Total expenditure was higher at P76.9 million in 2017/2018 financial year compared to P65.8 million in the previous year. During the year **the Regulatory Authority** experienced high operating costs at P12.2 million compared to P8.2 million in the 2016/2017. This was mainly due to Legal cost amounting to P3.5 million compared to P0.2 million in the previous financial year. The high legal costs were a result of litigation cases that necessitated the use of external legal services. **The Regulatory Authority** was also operating near full staff capacity.

The Regulatory Authority remains a going concern, considering the strong balance sheet with positive cash flows. The current assets were P12.2 million as compared to current liabilities of P6.7 million.

Performance of Regulated Entities

During the review period, the NBFIs operated in a restrained macro - economic environment, which saw a marginal rise in global economic growth to 3.2% in 2017 from 3.1% in 2016. While the domestic real GDP grew at a slower pace of 2.4 percent in 2017 compared with 4.3 percent in 2016. The inflationary environment, remained subdued with global inflation increasing slightly to 3.2 % in 2017 from 3.1 % in 2016. Domestic inflation also increased to 3.2 % in 2017, compared to 3% in the previous year. However, the NBFi sector remained profitable registering a decrease in profits to P1.6 billion in 2017, compared to P1.8 billion in 2016. Total assets of the NBFi sector, excluding assets of retirement funds (P79 billion) increased by P4 billion from P31 billion in 2016 to P34 billion in 2017. The capital position of the NBFIs increased to P7.1 billion in 2017 from P6 billion in 2016. In turn, profitability and safety ratios expressed as the net income to assets and capital to assets ratios, were 4.3% and 20.3% in 2017. Both ratios registered increases from 4.2% and 19.4% in 2016 attesting to the financial soundness of the NBFi sector.

The retirement funds investment assets increased by 9.2% to P82 billion in 2017 from P75.1 billion in 2016. The growth in retirement funds assets was mainly due to increases in the performance of investment markets. As at December 31, 2017 offshore investments of retirement funds were P53.7 billion while local assets accounted for P28.3 billion or 66/34 foreign/local asset split.

Legislative Reforms

The Regulatory Authority collaborated with Government in improving the regulatory framework to ensure its alignment to international best practices. Following the promulgation of the NBFIRA Act (2016), the NBFIRA board is now fully constituted. During the year under review, the NBFIRA Act (2016) commenced, which repealed and replaced the NBFIRA Act (2006).



Chairperson’s Report (cont.)

Regional and International Cooperation

The Regulatory Authority capitalises on its affiliation to various regional and international standard setting bodies in the regulation of the financial services sector to adopt and benchmark on best practice. This has enabled **the Regulatory Authority** to keep up with the latest developments in the regulation of the financial services sector. To date, **The Regulatory Authority** has entered into 13 Memoranda of Understanding with both local, regional and international organizations.

Acknowledgements

I wish to extend my appreciation to the Ministry of Finance and Economic Development for their guidance and continued support to **the Regulatory Authority**.

A special thanks goes to my colleagues on the Board of Directors for their commitment, dedication and contribution to the growth of **the Regulatory Authority**. In particular, I wish to recognise and appreciate the leadership and commitment of both the immediate past Chairpersons, Mr. Kenneth Matambo and Ms. Mmatlala Dube, respectively, who had steered the Board of **the Regulatory Authority** at different periods since its inception to its 10th year of operation - well done and thank you.

During the year under review, Mrs Mmatlala Dube, Dr Tebogo Matome and Mr Solomon Sekwakwa retired as Board Members. Their immeasurable contribution is much appreciated.

Further, **the Regulatory Authority** welcomed new Board Members, being, Ms Motlalepula Kabomo, Mrs Patrinah Masalela, Mr Kelotsositse Olebile, Dr Lesedi Senatla and Ms Ivy Ramalohanye. We welcome them, and look forward to their contribution towards taking **the Regulatory Authority** to new heights.

I also wish to thank NBFIRA management and staff for their continued hard work and diligence in ensuring that **the Regulatory Authority** remains a regulatory body of repute.

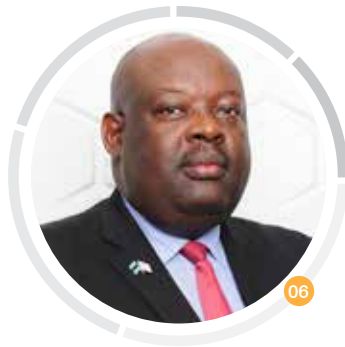
It will be remiss not to extend my acknowledgement to the regulated entities who continue to cooperate with **the Regulatory Authority** in the execution of its mandate.

A handwritten signature in blue ink, appearing to read 'Ludo Tema'.

Ludo Tema (Ms)

Acting Board Chairperson

Board of Directors team



01 Ms. L.T. Tema
Acting Chairperson

02 Ms. M.V. Kabomo
Member

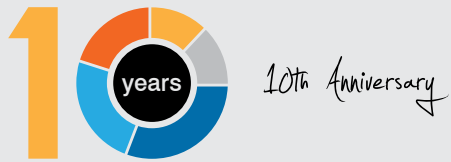
03 Ms. P. Masalela
Member

04 Mrs. A.T. Khunwana
Member

05 Dr. L.S. Senatla
Member

06 Mr. K. Olebile
Member

07 Ms. I. Ramalohanye
Member



Corporate Governance

Corporate Governance

COMPOSITION AND ROLE OF THE BOARD OF DIRECTORS

The Board of **the Regulatory Authority**, as established in terms of Section 5 of the NBFIRA Act (2016), is the governing body of **the Regulatory Authority**. The Board is responsible for setting the overall tone, and monitoring the standards of governance of **the Regulatory Authority**. The membership of the Board is presented in Table 2 and the outgoing Board Members are represented in Table 3 below

Table 2: Board of Directors

Name	Nature of Membership	Date of Appointment	End of Tenure
Ms. Ludo T. Tema*	Acting Chairperson	15/05/2015	14/05/2019
Ms. Mottlalepula V. Kabomo	Board Member	01/11/2017	31/10/2021
Ms. Agnes T. Khunwana	Board Member	01/10/2015	30/09/2019
Dr. Lesedi S. Senatla	Board Member	01/09/2017	31/08/2021
Ms. Patrinah Masalela	Board Member	01/09/2017	31/08/2021
Ms. Ivy M. Ramalohanye	Board Member	01/10/2017	30/09/2021
Mr. Keletsositse Olebile	Board Member	01/10/2017	30/09/2021

Note:* Acted Board Chairperson from 01-12-2017 to 31-03-2018

Table 3: Outgoing Board of Directors

Name	Nature of Membership	Date of Appointment	End of Tenure
Ms. Mmatlala Dube	Outgoing Chairperson	01/10/2014	30/09/2017
Dr. Tebogo T. K. Matome	Outgoing Board Member	01/03/2015	13/11/ 2017
Mr. Solomon M. Sekwakwa	Outgoing Board Member	01/10/2008	30/09/2017

COMMITTEES OF THE BOARD

The Board has established three (3) committees to assist it in carrying out its mandate. The committees are the Finance and Audit Committee (FAC), the Human Resources Committee (HRC) and the Licensing and Enforcement Committee (LEC). Table 4 below represents the constitution of each committee.

Table 4: Constitution of Committees of the Board

	FAC	HRC	LEC
Chairperson	Ms. Agnes T. Khunwana	Dr. Lesedi S. Senatla	Dr. Lesedi S. Senatla
Committee Member	Ms. Patrinah Masalela	Ms. Patrinah Masalela	Ms. Agnes T. Khunwana
Committee Member	Mr. Keletsositse Olebile	Ms. Ludo T. Tema	Mr. Keletsositse Olebile
Committee Member	Ms. Mottlalepula V. Kabomo	Ms Ivy M. Ramalohanye	–

Finance and Audit Committee

The Finance and Audit Committee ensures that **the Regulatory Authority** is in a sound financial position and remains a going concern. The Committee further provides the Board with advice on the operations of the system of internal controls, compliance with the relevant legislative requirements, implementation of risk management, and oversight of the procurement function in line with delegated responsibilities. The Committee had four meetings and one extraordinary meeting during the financial year.

Human Resource Committee

The Human Resource Committee provides recommendations on **the Regulatory Authority's** human resources strategy and supporting policies, manpower plans, remuneration policies and recommendation for appointment of executive management positions to **the Regulatory Authority**. The Committee met four times during the financial year.

Licensing and Enforcement Committee

The Licensing and Enforcement Committee, established during the period under review, is responsible for overseeing the licensing process in line with the governing legislature. It is also responsible for the enforcement of legislation in the event of non-compliance of a grave nature. The Committee met four times during financial year as scheduled.

Board Meetings

Section 13(2) of the NBFIRA Act (2016) mandates that the number of Board Meetings to be conducted in a financial year is four (4). Table 5 below indicates the number of meetings conducted in the period 2017/18.



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Corporate Governance (cont.)

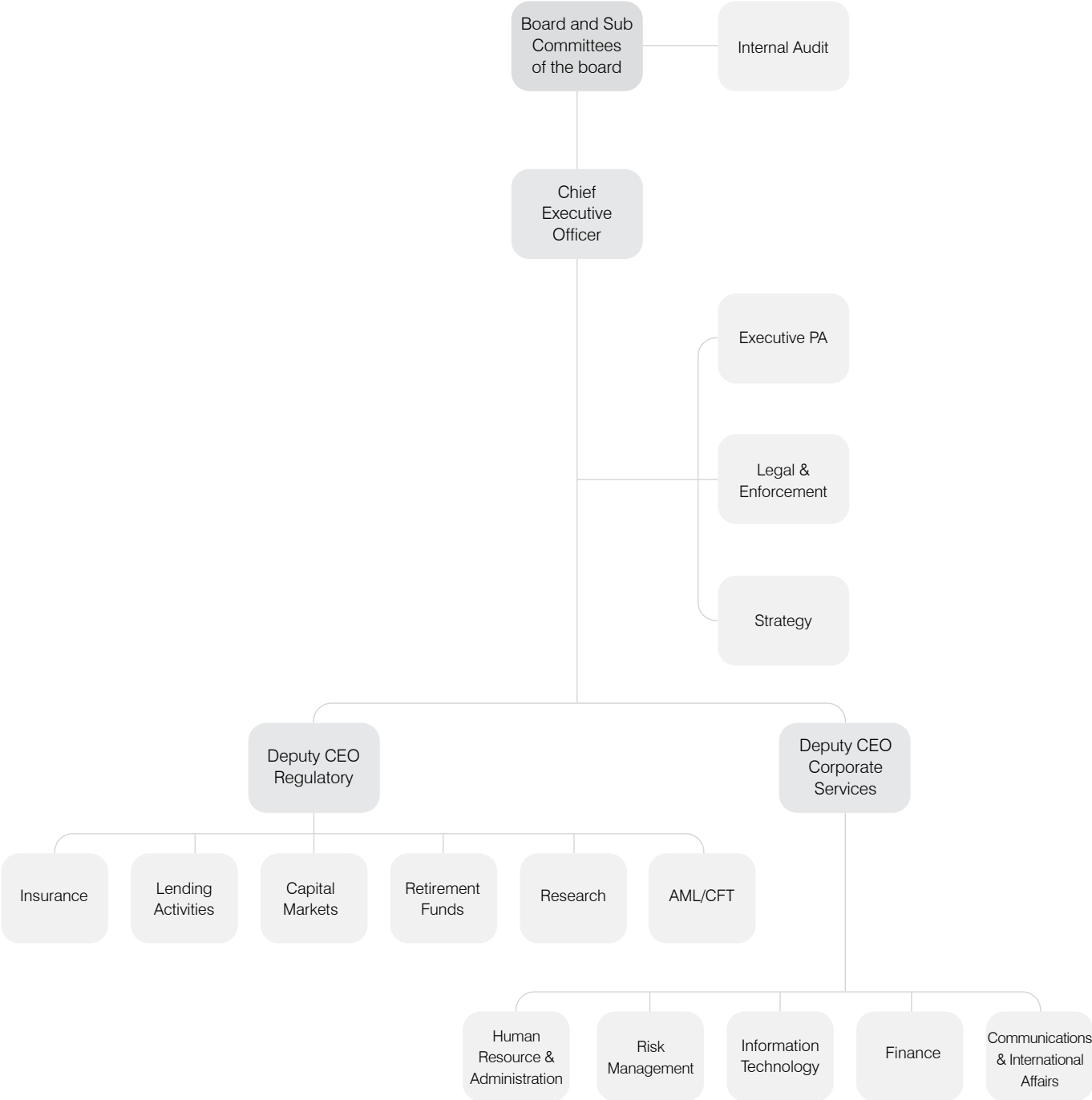
Table 5: Number of Meetings

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Main Board	5/05/2017 22/05/2017	4/08/2017 29/08/2017	9/11/2017	30/01/2018 29/03/2018	7
Human Resource Committee	18/04/2017	14/07/2017	13/10/2017	18/01/2018	4
Finance & Audit Committee	18/04/2017 28/06/2017	14/07/2017		19/01/2018 20/03/2018	5
Licensing & Enforcement	17/05/2017 31/05/2017	26/07/2017		19/01/2018	4



Corporate Governance (cont.)

Figure 1: Organizational Structure





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The Regulatory Authority continued to foster the safety and soundness of NBFIs through the implementation of the Risk Based Supervisory (RBS) model, hence ensuring the stability of financial system.

Chief Executive Officer's Overview

The Regulatory Authority continued to exercise its powers and functions with a view to improving fairness, efficiency and orderliness of the non-bank financial sector and contributing to the stability of the financial system as a whole, through effective supervision and regulation of the regulated entities. During the year under review, emphasis was placed on the implementation of the 2016 – 2021 five year strategic plan, which focused on promotion of financial soundness and good market conduct, improving stakeholder confidence and improving operational efficiency by remaining adaptable and responsive to regulatory changes and standards, as well as improving compliance with local and international AML/CFT requirements.

Under the review period, **the Regulatory Authority** achieved 87% of the overall strategy performance against a target of 92%, and was supported by **the Regulatory Authority's** Risk Management Policy, Framework and Strategy, which ensured that risk management is embedded in **the Regulatory Authority's** strategy and operations. The focus, during the year, was on assessing and updating identified risks and training staff members on the risk policy and consistent application of the risk toolkit. Furthermore the Internal audit function was insourced by establishment of a department in July 2017 to provide advisory and assurance services to **the Regulatory Authority**.

Supervisory Developments

The Regulatory Authority continued to foster the safety and soundness of NBFIs through the implementation of the Risk Based Supervisory (RBS) model, hence ensuring the stability of financial system. The RBS model entails deployment of resources to high risk entities. In addition, **the Regulatory Authority** deployed more resources towards creating awareness of AML/CFT legislation and monitoring of compliance by regulated entities, in pursuit of the objective of deterring financial crimes and suspicious financial transactions.

The Regulatory Authority engaged non-compliant entities and took necessary regulatory actions, which included, amongst others, imposition of administrative and civil penalties, suspension of licenses, and appointment of statutory managers or equivalent care takers, as necessary. **The Regulatory Authority** developed and documented a ladder of supervisory intervention with the view to promoting consistency of application of supervisory powers across the industries and assuring transparency of the regulatory actions to the regulated entities. Implementation of the document was pending Board approval by year end March 2018.

In an effort to improve efficiency in supervision and regulation, **the Regulatory Authority** has further improved utilization of information technology through Risk Based Supervisory System and Enterprise Resource Planning programme. This enabled a web based system, which remains key as it allows the regulated entities to be able to submit their returns online. The system has brought about the much needed streamlining and efficiency in **the Regulatory Authority's** service provision and effective reporting.

Human Capital Development

The Regulatory Authority continued its drive to attract and retain skilled staff, improve employee competencies and the promotion of a high performance culture. During the year under review, **the Regulatory Authority** was at a headcount of 88, compared to 80 in the previous year, against an approved structure of 94. The staff compliment included one (1) expatriate staff member at executive level. **The Regulatory Authority's** attrition rate was 3.4 % for the financial year 2017/18, which was an increase from 2% reported in the previous year.

Stakeholder Engagement and International Affairs

During the year under review, **the Regulatory Authority** continued to pursue its role of stakeholder engagement through participation in interactive sessions, such as industry meetings, presentations, trade fairs and exhibitions. It held financial literacy campaigns throughout the country, where the roles played by the non-bank financial institutions were simplified for better appreciation and understanding by the consumers. These campaigns enabled the public to make informed decisions when dealing with the regulated entities and this in turn reduced the number of complaints received by **the Regulatory Authority**.

As a member of International Standard Setting Bodies, **the Regulatory Authority** continued to participate in the relevant technical committees. While these engagements expose the staff to best regulatory practices, they also ensure that **the Regulatory Authority** participates in multilateral agreements. As at the end of the reporting period, **the Regulatory Authority** signed a total of 13 MOUs with both international and local organisations, of which two (2) were signed in the period under review.

Acknowledgements

I wish to thank the Board for their strategic leadership and commitment to **the Regulatory Authority**. Let me also take this opportunity to wish farewell to Ms. M Dube, Dr. T.T.K. Matome, and Mr S.M. Sekwakwa whose tenures as Board members ended during 2017/18. Moreover, I wish to welcome new Board members, Ms M. Kabomo, Dr. L.S. Senatla, Mrs P. Masalela, and Mr K. Olebile.

Lastly, I wish to appreciate the Management and Staff of NBFIRA for their contributions towards fulfilling **the Regulatory Authority's** mandate.

Invitation to Celebrate 10 Year Anniversary

I invite the reader to celebrate our ten years anniversary by reading the achievements and challenges that we chronicle in the supplementary document appended hereof.

Ramasedi O.M. (Mr)
Chief Executive Officer

Executive Management team



01



02



03



04



05



06



07



08



09

01 Mr. O.M. Ramasedi
Chief Executive Officer

04 Mrs. J. White
Director - Capital Markets

07 Mrs. G. Seromelo
Chief Internal Audit Executive

02 Mr. M. Segage
Deputy CEO - Corporate Services

05 Ms. B. Soko
Director - Retirement Funds

08 Mrs. D.K. Makepe
Director - Legal and Enforcement

03 Mr. S. Gade
Deputy CEO - Regulatory

06 Mrs. M.V. Raphaka
Director - Insurance

09 Ms. N. Modongo
Director - Lending Activities

Senior Management team



- 01 **Mr. M.P. Rampha**
Head of Information Technology
- 02 **Ms. O. Modisa**
Head of Research
- 03 **Mr. D.M. Dumedisang**
Head of Human Resource
- 04 **Ms. V. Namate**
Deputy Director - Insurance
- 05 **Ms. G. Masike**
Head of Strategy
- 06 **Mr. K. Radira**
Deputy Director - Legal & Enforcement
- 07 **Ms. A. Mpe**
Deputy Director - Legal & Enforcement
- 08 **Mr. P. Sesinyi**
Deputy Director - Retirement Funds
- 09 **Mr. K. Balopi**
Head of Risk
- 10 **Ms. M. Kwerepe**
Deputy Director - Capital Markets
- 11 **Mr. M. Kebelefetse**
Deputy Director - Lending Activities
- 12 **Mrs. M. Mongati**
Head of AML/CFT
- 13 **Ms. M. Mpai**
Acting:Head of Communications & International Affairs
- 14 **Mr. E. Ncaagae**
Head of Finance

Staff group photos



Staff group photos (cont.)



Strategy Overview

The Strategic Plan: 2016 - 2021

The Regulatory Authority ensures effective and efficient discharge of its mandate through the consistent development, implementation and review of its strategic plan. **The Regulatory Authority** is committed to implementation of its strategic plans through regular reviews and quarterly reporting of performance to the Board of Directors.

The Regulatory Authority is in its 2nd year of implementation of the 2016 to 2021 Strategic Plan.

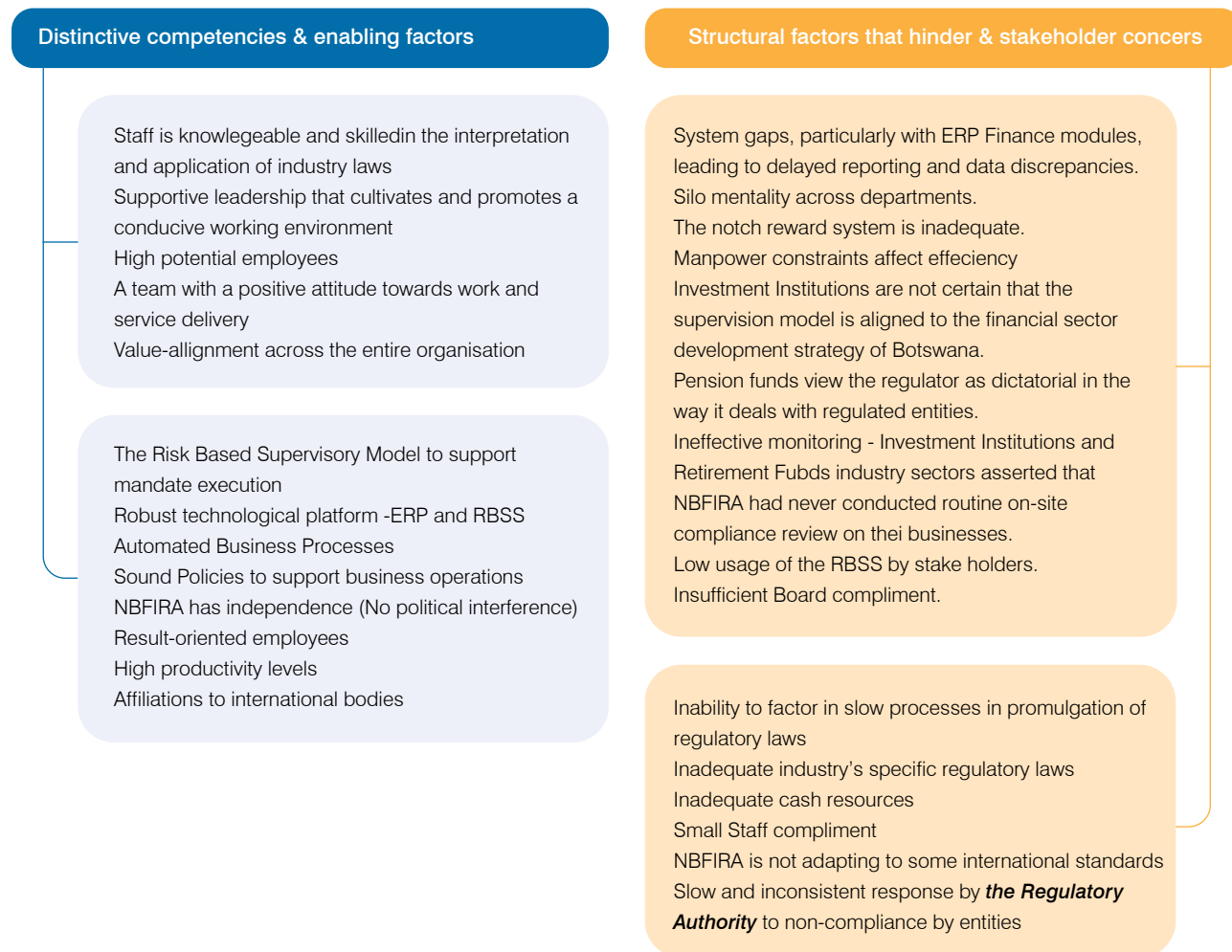
The Strategy Review

In positioning itself to respond to and address the challenges posed by the ever evolving and changing environment in which

the Regulatory Authority operates, management reviewed the Strategic Plan in August 2017. This was preceded by extensive engagement with key stakeholders mainly the Board of Directors, staff, regulated entities and the Ministry of Finance and Economic Development to obtain their input on **the Regulatory Authority's** ability to deliver on its mandate.

The situational analysis depicted in Figure 2 below is part -representation issues arising from the stakeholder engagement process.

Figure 2: Situational Analysis Summary

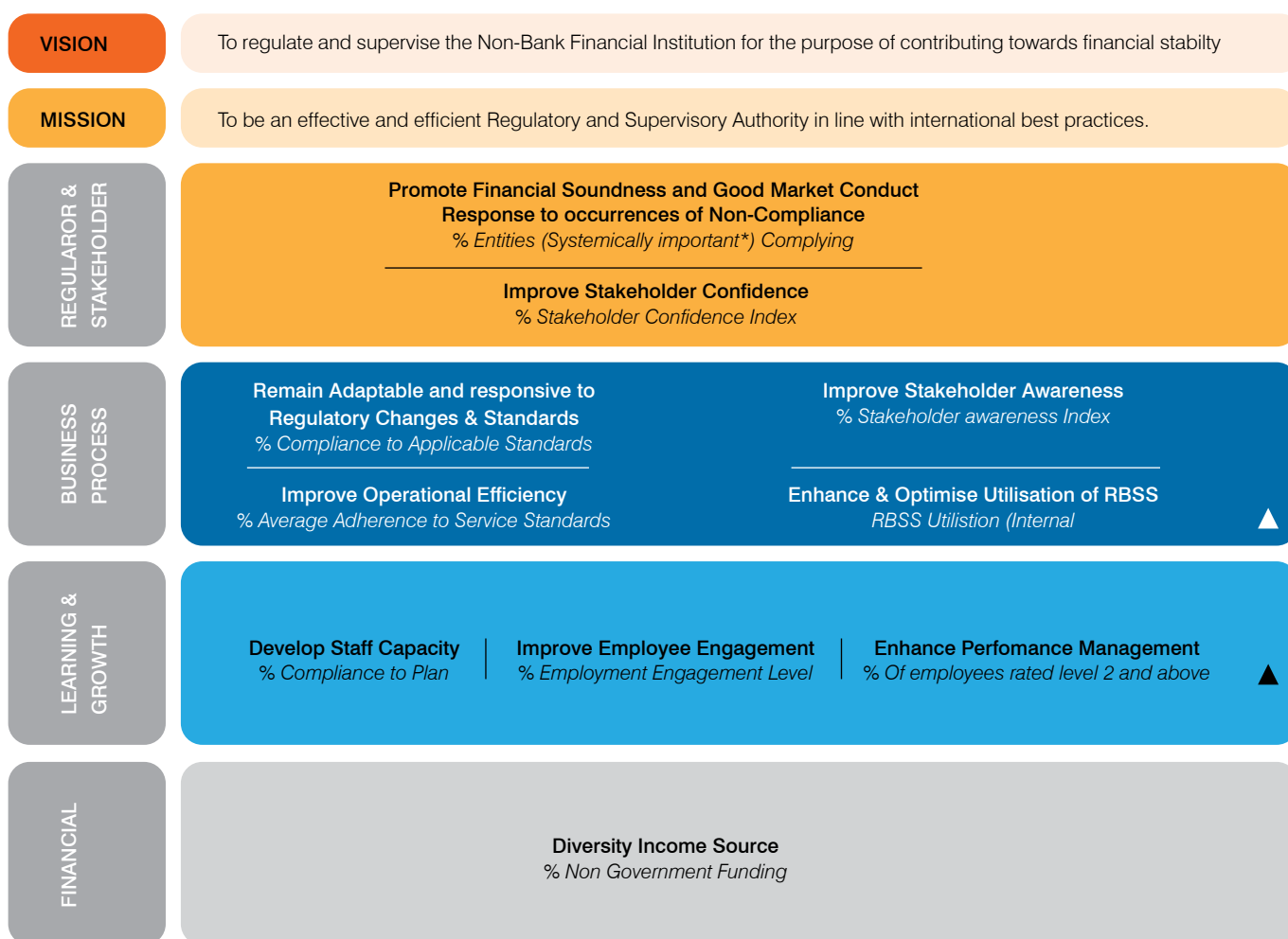


Strategy Overview (cont.)

The outcome of the strategy review process is captured in the following strategy map below (Figure 3) and articulates **the Regulatory Authority's** focus area during the 2017/18 financial year.

- The need to address diverse stakeholder expectations and concerns as depicted in the situational analysis outlined above
- An appreciation of changes in the financial services and regulatory landscape with emerging financial products and rapid technological advances requiring adaptability and agility
- The need to adhere to principles set by international and regional standard setting bodies for regulation and supervision
- The need to remain financially sustainable in the face of limited financial resources

Figure 3: The NBFIRA Strategy Map



Summary Of Performance

Table 6 below presents a high level overview of **the Regulatory Authority's** performance against the targets as set in the strategic plan.

Strategy Overview (cont.)

Table 6: Summary Of Performance







	Strategic Objective	Measure	Initiative	Performance Update	Performance Status
Regulatory & Stakeholder 25%	Promote Financial Soundness and Good Market Conduct	Timely Response to Occurrences of Non-Compliance	Define Resolution & Timeframes requirements for all Departments	The Regulatory Authority devoted a significant amount of time in developing a supervisory ladder of intervention guidance manual. The aim of which is to ensure a systematic application of supervisory intervention in a timely, consistent and equitable manner. Enshrined in the manual are resolution timeframes and requirements for all sectors to enable the Regulatory Authority to also monitor its own response times against set standards. The manual is expected to be in use by the 2nd Quarter of 2018/19. Implementation of the complaints management procedure is ongoing.	
		% Entities (Systemically Important*) Complying	Develop and implement prudential limits and/or supervisory processes, and industry-specific guidelines Implement Complaints Management Procedure		
	Improve Stakeholder Confidence	Stakeholder Confidence Index	1. Conduct Surveys 2. Implementation of recommendations from the Surveys	A stakeholder confidence survey was conducted in the insurance industry in June 2017 and an execution plan developed to address issues arising from the survey. The Regulatory Authority continues to monitor implementation of issues arising from past surveys undertaken in other sectors.	

Note: *includes AML/CFT




Business Processes	Improve Operational Efficiency	% Average Adherence to Service Standards	1. Identify and implement business process improvement opportunities 2. Quarterly Service Delivery Reports	The Regulatory Authority continues to monitor adherence to set service standards and performance against the set standards is reported to the Board of Directors on a quarterly basis. These are reviewed to improve operational efficiency.	
	Enhance & Optimise Utilisation of RBSS Systems	RBSS Systems Utilisation (Internal)	1. Conduct Refresher Training on the System 2. Develop a policy to ensure compliance 3. Review RBSS Processes	In an effort to address low utilisation of the RBSS particularly by the Retirement funds sector, a refresher training on the use of the system was undertaken in December 2017. utilisation of RBSS is expected to improve following this intervention.	

Strategy Overview (cont.)

Table 6: Summary Of Performance (continued)

	Strategic Objective	Measure	Initiative	Performance Update	Performance Status
Business Processes	Improve Stakeholder Awareness	% stakeholder Awareness Index	Conduct Stakeholder Awareness Surveys	Due to budgetary constraints, a stakeholder awareness survey could not be undertaken during the period. However issues raised from the stakeholder awareness survey that was conducted in 2015 continue to be addressed.	
	Remain Adaptable and Responsive to Regulatory Changes & Standards	% Compliance to Applicable Standards	Implement Consumer Financial Literacy Strategy Annual review of the Regulatory Framework to Identify Gaps	The Regulatory Authority continued to engage with various stakeholders on various consumer outreach campaigns throughout the country The Regulatory Authority continues to review its regulatory framework to close existing gaps	
			Annual Review of Alignment to International Standards to identify Gaps	A continuous review of the Regulatory Authority's compliance to international standards is undertaken through ongoing self-assessments. During the period, the Regulatory Authority presented a self-assessment report at the IOPS meeting held in October 2017. The Capital Markets is currently in discussions with IOSCO to exploit avenues of improving self-assessment ratings.	
Learning & Growth	Develop Staff Capability	% Compliance to Plans	Develop Staff Training Plans	Capacity building is a very critical component in equipping staff with the skills and competencies required for regulation and supervision. To this end, staff are offered opportunities of attachment and familiarisation programs with more experienced regulatory authorities regionally and internationally, as well as continuous development and training programmes.	
	Improve Employee Engagement	Employee Engagement Level	Implement Human Capital Strategies (Review General Conditions of Employment, Wellness Policy, Training Policy, etc)	The Regulatory Authority participates in the annual Best Company to work for Survey. Through feedback obtained from the surveys management has been to the extent possible reviewed the general conditions of service to align with employee concerns.	
	Enhance Performance Management	% of employees rated level 2 and above *	1. Review and Close Gaps in the PMS System 2. Training for Staff on PMS	In an effort to ensure consistent application of the performance management system and to address gaps with the current system, the Regulatory Authority will conduct training for all staff on PMS in the 2018/19 financial year. The training is further expected to bridge existing gaps in the PMS system.	
Financial Perspective	Diversify Income Sources	% Non-Government Funding	1. Transition to operating within a self-sustaining funding model framework 2. Identify and negotiate with Potential Donors	the Regulatory Authority continues to implement the financial sustainability strategy, as at reporting period government funding stood at 26% of the Regulatory Authority's total revenue in comparison with 29% in the previous financial year. the Regulatory Authority envisages a reduction of government funding to a target of 15% by financial year ending 2021.	

LEGEND

-  80-100%
-  65-79%
-  0-64%



Risk Management

Introduction

The Risk Department is responsible for coordination of risk management activities for the purpose of ensuring efficiency and efficacy on operations with the objective of ensuring that **the Regulatory Authority** achieves its mandate and strategic objectives. This include risk identification, analysis and evaluation, treatment, monitoring and reporting. All specific risks related to NBFIRA's strategic objectives, division and projects are identified and managed. **The Regulatory Authority** has developed a risk management framework, policy and strategy to ensure that risk management is effective, proactive, interlinked and is consistently applied across **the Regulatory Authority**.

Risk Management

The Regulatory Authority's Risk Management Policy, Framework and Strategy has played a crucial role in ensuring that risk management is embedded in **the Regulatory Authority's** strategy and operations. As a result, **the Regulatory Authority** has noted an improvement in embracing risk management, this has had a positive impact in managing the risk at departmental and corporate level. Initiatives have been undertaken by the risk owners to lead discussions and guide their teams in selection of effective risk mitigation strategies and implementing them. Risk Management has become an agenda item at both operational and strategic meetings, this has promoted risk management practices which have propelled **the Regulatory Authority** towards an enhanced risk culture in line with the Risk Management Strategy.

Risk Management Governance

The Regulatory Authority's Board has the overall responsibility for risk governance and it directs **the Regulatory Authority** to becoming a risk intelligent organization. The Board further sustains and strengthens the risk intelligent tone and promotes

a risk intelligent culture within **the Regulatory Authority**. The Board of Directors govern risk through the structures in place, in such a way that supports **the Regulatory Authority** in setting and achieving its strategic objectives within the determined acceptable risk appetite levels. The Board, in discharging its risk management responsibilities is supported by the Finance and Audit Committee, where risks are deliberated at greater detail.

A Risk Management Committee has been introduced to improve the monitoring of risks faced by **the Regulatory Authority**. The committee is constituted by the Executive Management and meets on a monthly basis. Departments meet on a quarterly basis to assess their risks in line with the risk management framework.

The Regulatory Authority has carried out internal training programs for the staff members to ensure that a common risk language is spoken and consistent application of the risk toolkit. The topics imparted with staff members related to Risk Universe, Risk Ownership, Key Risk Indicators, Barriers to Strategy Implementation and Definition of Risk.

The focus during the year was on identifying relevant Key Risk Indicators which will signal potential areas which require greater attention and adequate response with the implementation of key controls. Risk indicators have been of assistance in providing light on the likelihood of the risk actualizing, and thereby having adverse impact on the set objectives.

Key Risks

The Regulatory Authority's strategic risks are aligned to its mandate and strategic objectives. Table 7 below shows the key risks and their responses.

Table 7: The key risks and their responses.

Strategic Objective	Strategic Risk	Existing Control	Management Response
Promote financial soundness and good market conduct – Response to occurrences of Non-Compliance	Ineffective Regulation on Money Laundering/Terrorist Financing	<ul style="list-style-type: none"> • AML/CFT Guidelines • Training • AML/CFT champions 	<ul style="list-style-type: none"> • Upskilling or capacity building of regulatory departments on AML/CFT matters • Awareness of industry players on their AML/CFT obligations • Imposition of sanctions for non-compliance on key areas

Risk Management (cont.)

Table 7: The key risks and their responses. continued

Strategic Objective	Strategic Risk	Existing Control	Management Response
Improve Stakeholder Confidence	Market credibility risk	<ul style="list-style-type: none"> • Training • Regulatory and Enforcement guidelines • Risk Based Supervision 	<ul style="list-style-type: none"> • Develop and implement prudential rules and regulations of unregulated sector (Medical Aid Funds, Financing & Leasing companies).
Diversify income sources	Inadequate funding to implement the strategy.	<ul style="list-style-type: none"> • Financial stability status • Prudent cost management • Annual review of the levies frameworks • Optime return for investments • Request for funding of specific projects or activities 	<ul style="list-style-type: none"> • Annual review of Supervisory Levies (an increase of 5% per annum across board) • Adding new regulated sectors to the Supervisory Levies instrument, to broaden the collection and cost-recovery base • Identify and request for funding for special projects from government and donors • Intensify collection efforts through constant engagement with regulated billed entities
Improve Operational Efficiency	Cyber Attack	<ul style="list-style-type: none"> • Firewall • Anti-virus systems • Security policies • Security awareness • Security updates and patches • Currently using the latest operating systems 	<ul style="list-style-type: none"> • Cyber security training • Strict Adherence to the IT Policies
Improve Operational Efficiency	Inadequate goal alignment	<ul style="list-style-type: none"> • Scorecard cascading • Quarterly Performance Reviews • Fortnightly strategy meetings • (DCEOs and CEO) 	<ul style="list-style-type: none"> • Monitoring of the strategy implementation • Quarterly performance reviews for staff.

10 YEARS MILESTONE - ENTERPRISE - WIDE RISK MANAGEMENT

Risk Management Strategy

A Risk Management Department in NBFIRA was populated in 2016, since then, there has been significant improvements on the risk management landscape. **The Regulatory Authority** has developed the Enterprise-wide Risk Management Framework and Risk Management Strategy.

The Regulatory Authority's risk management strategy is to become a Risk Intelligent enterprise. Moderate strides have therefore been accomplished. As at March 31st 2018, the Risk Maturity Assessment revealed that **the Regulatory Authority** was at Systematic Level

(4th level out of 5 levels). At this level, the following activities were achieved in managing the risk profile:

- Coordination of risk management activities across the departments
- Risk appetite is fully defined
- Enterprise-wide risk monitoring, measuring and reporting is executed in line with the risk framework
- Dedicated risk team is in place
- There is knowledge sharing across the risk functions
- Communication of strategic risks to the Board; and
- Risk Management training is in place

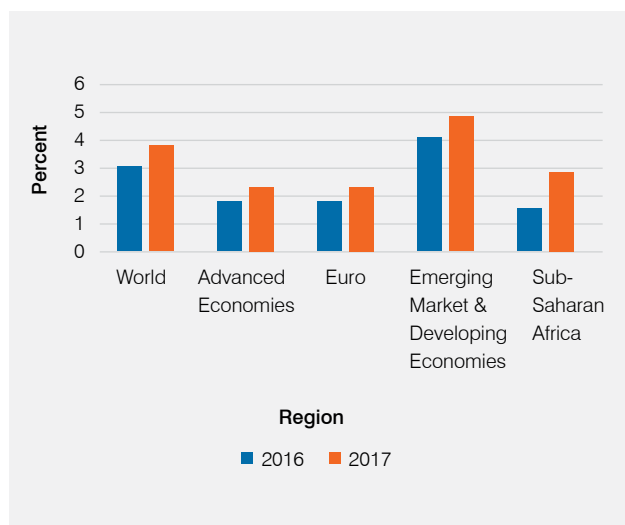
General Overview of the Economic Environment, Regulatory and Supervisory Activities

The Regulatory Authority, through the Research Department, seeks to conduct market intelligence within the NBFIs sector. This is achieved by tracking recent developments in the economy, and most importantly, in the financial sector, for the purpose of informing policy formulation, review and implementation. Thus facilitate strategic and operational decision making for supervision and regulation of the non-bank financial sector.

Global Economic Overview

Global economic growth strengthened to 3.8 % in 2017 from 3.1 % in 2016. This was driven by investment recovery in advanced economies and continued strong growth in emerging markets. Advanced economies and the Euro area recorded a notable upswing from 1.7 % in 2016 to 2.3 % in 2017. Emerging Markets and Developing Economies grew from 4.1% in 2016 to 4.8 % in 2017. Economic growth for Sub-Saharan Africa also increased significantly from 1.5 % in 2016 to 2.8 % in 2017 (see Figure 4).

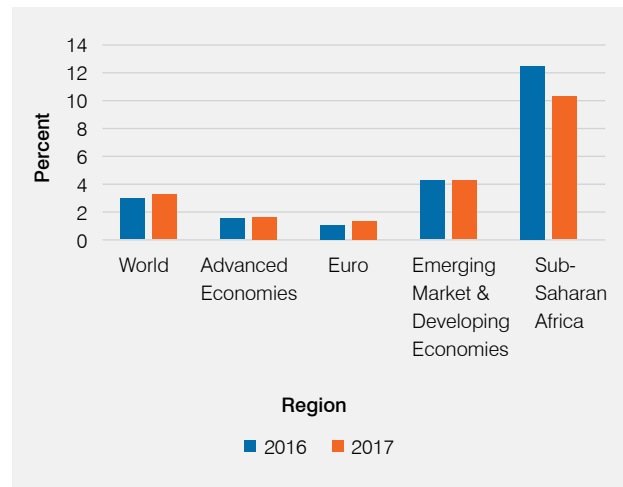
Figure 4: Global Real GDP Growth for Year – ending December 31



Source: IMF World Economic Outlook

Global inflation remained benign, recording a marginal increase to 3.2% in 2017 from 3.1% in 2016, as the effect of fuel prices was offset by restrained global aggregate demand and slow wage growth in advanced economies. Looking forward, global inflation is expected to increase on the back of expected rise in commodity prices. Global inflation is expected to increase to 3.5% in 2018, which could slightly increase interest rates and result in tightening of monetary policy stance. Figure 5 below shows global inflation.

Figure 5: Global Inflation for Year ending December 31

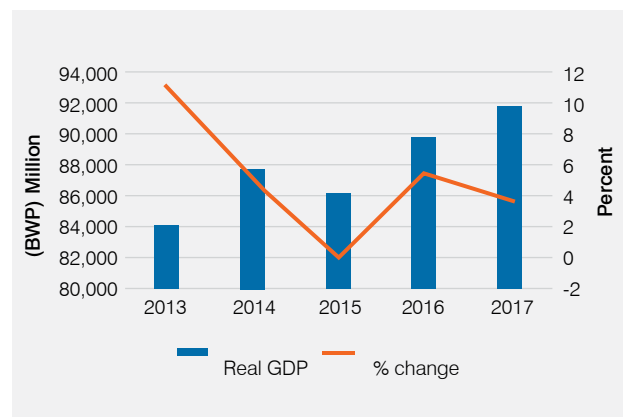


Source: IMF World Economic Outlook

Domestic Economic Overview

Domestic real GDP grew at a slower pace of 2.4 percent in 2017 compared with 4.3 % in 2016. Growth was undermined by the mining sector, which declined by 11.2 % in 2017, compared to a decline of 3.5 % in 2016 (see Figure 6).

Figure 6: Domestic Real GDP Growth for Year –ending December 31



Source: Bank of Botswana, Botswana Financial Statistics April 2018

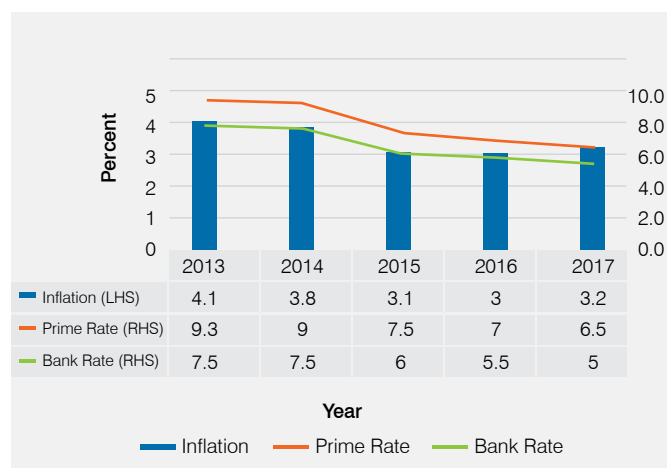
Domestic Inflation and Interest Rate Developments

Domestic Inflation increased to 3.2 percent in 2017 from 3 percent in 2016. The rate of increase in prices was modest for most categories of goods and services, with fuel prices dominating the upward movement. Monetary Policy continued

General Overview of the Economic Environment, Regulatory and Supervisory Activities (cont.)

to be accommodative and the state of the economy remained stable but below the 7 percent target for SADC member countries. The bank rate was reduced by 50 basis points to 5 percent in 2017, from 5.5 percent at the end of prior year. Consequently, the prime lending rate for commercial banks decreased from 7 percent in 2016 to 6.5 percent in 2017 (see Figure 7).

Figure 7: Domestic Inflation and Interest Rates for the Year –ending December



Source: Bank of Botswana, Botswana Financial Statistics April 2017

Table 8: Selected Botswana Annual Macro-Economic Indicators as of December 31

Indicator	2016	2017
Gross Domestic Product (GDP) in Millions of Pula		
Real GDP (P' Million)	89,775	91,917
% Annual Growth	4.3	2.4
Nominal GDP (P' Million)	169,688	180,113
% Annual Growth	16.3	6.1
Inflation (% Annual Growth)		
CPI (End of Period)	3.0	3.2
CPI (Average)	2.8	3.3
Interest Rates (%)		
Bank Rate	5.5	5.0
Prime Rate	7.0	6.5

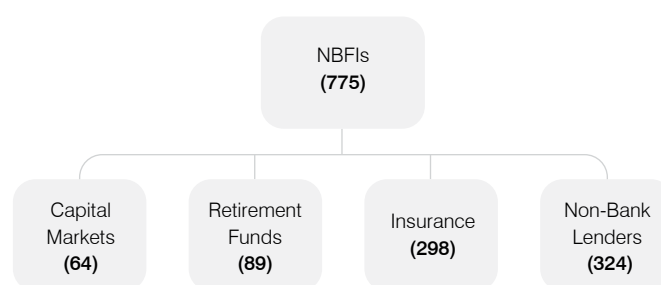
Source: Bank of Botswana, Botswana Financial Statistics March 2017

Structure of the Non-Bank Financial Institutions by Industry

As at March 31, 2018, the non-bank financial institutions sector recorded a total of 775 active entities, reflecting a growth of 11% from 698 entities recorded in the previous year. The net increase in regulated entities is mainly due to the positive movement in all

industries, with the Micro Lending industry dominating the sector with 324 players in 2018 from 311 players in 2017, followed by the Insurance industry recording 298 players in 2018 from 246 players in 2017, then Capital Markets industry with 64 players in 2018 from 53 in 2017 and, lastly, the Retirement Funds industry with 89 players in 2018 from 88 in 2017 (see figure 8).

Figure 8: Structure of the Non-Bank Financial Institutions by Industry as of March 31, 2018



Source: NBFIRA

Importance and Role of the Non-Bank Financial Institutions Sector (NBFIs) in Botswana

The NBFIs sector continued to be dominant in the financial system with its market share of financial system assets remaining unchanged at 57%. All sectors, save for Capital Markets, recorded a positive growth in assets (see Table 9).

General Overview of the Economic Environment, Regulatory and Supervisory Activities (cont.)

Table 9: Structure of the Botswana Financial System Assets, as at December 31.

Financial Institution	Number of institutions	2016 P' Million	2017 P' Million	% of Total Assets	Annual % Change
Banking Sector*1	14	88,180	91,390	42.7	3.6
Commercial Banks		80,694	83,468	39.0	3.4
Statutory Banks*2	3	7,486	7,922	3.7	5.8
Non-Bank Sector		114,278	122,789	57.3	7.4
Life Insurance	8	19,294	21,425	10.0	11.0
Non-Life Insurance	11	1,938	1,874	0.9	(3.3)
Re-Insurer	3	249	254	0.1	2.0
Investment Institutions *3	31	5,420	6,216	2.9	14.7
AUM for Retail & Private*4	n/a	7,478	8,390	3.9	12.2
Retirement Funds *8	87	75,129	78,855	36.8	5.0
Capital Markets*7	6	167	162	0.1	(3.0)
Micro Lenders (Top 20)*5	20	3,287	4,232	2.0	28.7
Others (Estimate) *6	>250	1,316	1,381	0.6	4.9
Financial Sector Grand Total		202,458	214,179	100.0	5.8

Note:*1 The financial system figures exclude the Bank of Botswana (BOB), the Citizen Entrepreneurial Development Agency (CEDA), Motor Vehicle Accidents Fund (MVAf), Botswana Development Company (BDC), Savings and Credit Cooperatives (SACCOS) and the International Financial Services Centre (IFSC), which are represented below.

Financial Institution	2016 P' Million	2017 P' Million	Year – on -Year Percent Change
Bank of Botswana (Central bank)	77,593.3	74,330.7	(4.2)
Botswana Development Corporation	2,550.4	2,377.8	(6.8)
Motor Vehicle Accident Fund	3,817.4	-	-
SACCOS and IFSC (estimate)	0.5	0.5	-
Total	83,961.6	76,709	(8.6)

***2** Includes: Botswana Savings bank (P2, 217 million in 2016 and P2, 515 million in 2017), National Development Bank (P1, 654 million in 2016 and P1, 145 in 2017 million) and Botswana Building Society (P3, 765 million in 2016 and P4, 261 million in 2017).

***3** Investment Institutions figures reflects own company assets for Asset Managers (22) and Mancos (9).

***4** Assets managed by Investment Institutions on behalf of retail and private clients.

***5** Top 20 Micro Lenders by loan portfolio value.

***6** Includes Medical Aid Funds (P875 million- 2016 and P944 million- 2017); Insurance Brokers (P393 million – 2016 and P388 million - 2017), Micro Lenders other than top 20 by portfolio values plus Pawn shops, Finance and Leasing Companies (P48 million – 2016 and P49 million in 2017).

***7** Capital Markets includes four brokers, Securities exchange and Central Securities Depository Botswana

***8** Audited figures during 2017; Management alc as at December 31, 2017 recorded P82 billion

Source: NBFIRA, Bank of Botswana

NBFIRA Supervisory Approach and Process

The Regulatory Authority utilizes both on-site and off-site supervisory processes to execute its mandate, with the latter providing early warning signals for pro-active regulatory actions. The off-site process combines the qualitative and quantitative information to profile and rate the entities according to their

level of risks. The risk scoring methodology provides for the determination of a Supervisory Attention Index, which is ranked from normal, watch list, remedial action, onsite supervision and restructure.

General Overview of the Economic Environment, Regulatory and Supervisory Activities (cont.)

As at December 2017, a total number of 117 entities were profiled, reflecting a decline of 3 % from the 121 entities profiled the previous year. During the year under review, 61 entities were considered be normal, 47 entities were on watch list, five (5) entities required remedial action, three (3) required onsite inspection, while only one (1) required restructuring.

Table 10: Supervisory Attention Index

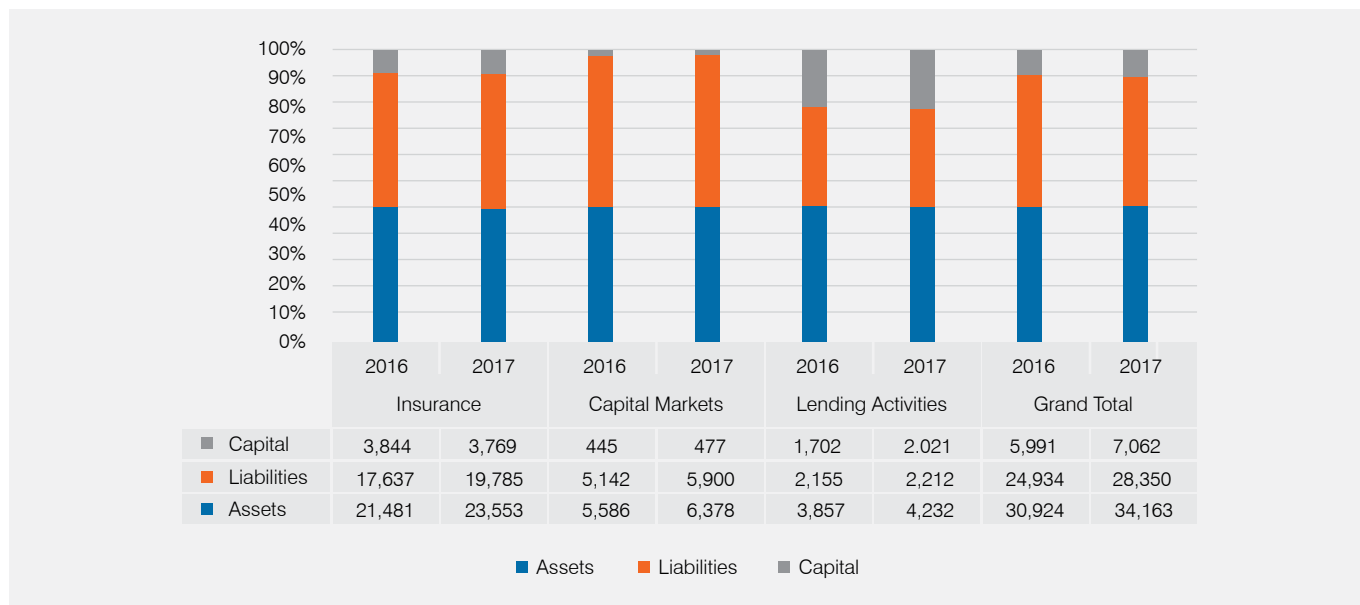
Status	2016	2017	% Change
Normal	60	61	1.7
Watch list	49	47	(4.1)
Remedial Action	8	5	(37.5)
Onsite Supervision	4	3	(25)
Restructure	0	1	-
Total	121	117	(3.3)

Source: NBFIRA

The Statement of Financial Position of the NBFI Sector

Figure 9 below shows the structure of the statement of financial position of the NBFI sector expressed in terms of total assets of the respective businesses. During the year ended December 2017, the assets of the businesses operating in the sector increased by 9.6% to P34 billion, from P31 billion recorded in 2016. The capital to assets ratio of the sector registered a slight increase to 19.9 % in 2017 from 19.3% the previous year, reflecting a slight improvement in the solvency of the non-bank sector.

Figure 9: Abridged Statements of Financial Position of NBFIs for the Year ending December 31



Source: NBFIRA

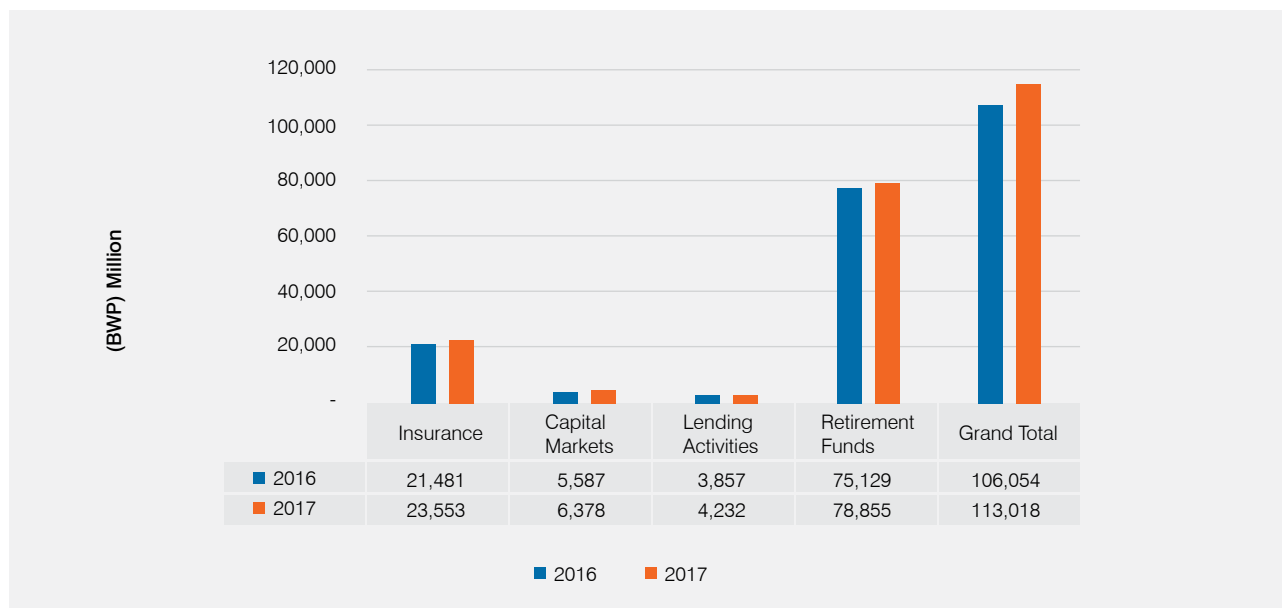
Note: The retirement funds, Assets under Management and medical aid funds are excluded as they are off balance sheet items. Insurance brokers assets, on the other hand, are excluded to avoid double counting.

Figure 10 below presents overall sector assets, including retirement funds and other entities (but excludes AUM of the NBFIs on behalf of retail and private sector P8 Billion) during the review period. The NBFI sector own company assets increased to P113 Billion in 2017

from P106 Billion in 2016. Retirement Funds remained dominant in the NBFI sector, with a market share of total assets of 70% in 2017, compared to 71% the previous year.

General Overview of the Economic Environment, Regulatory and Supervisory Activities (cont.)

Figure 10: Total Assets of NBFIs for the Year ending December 31

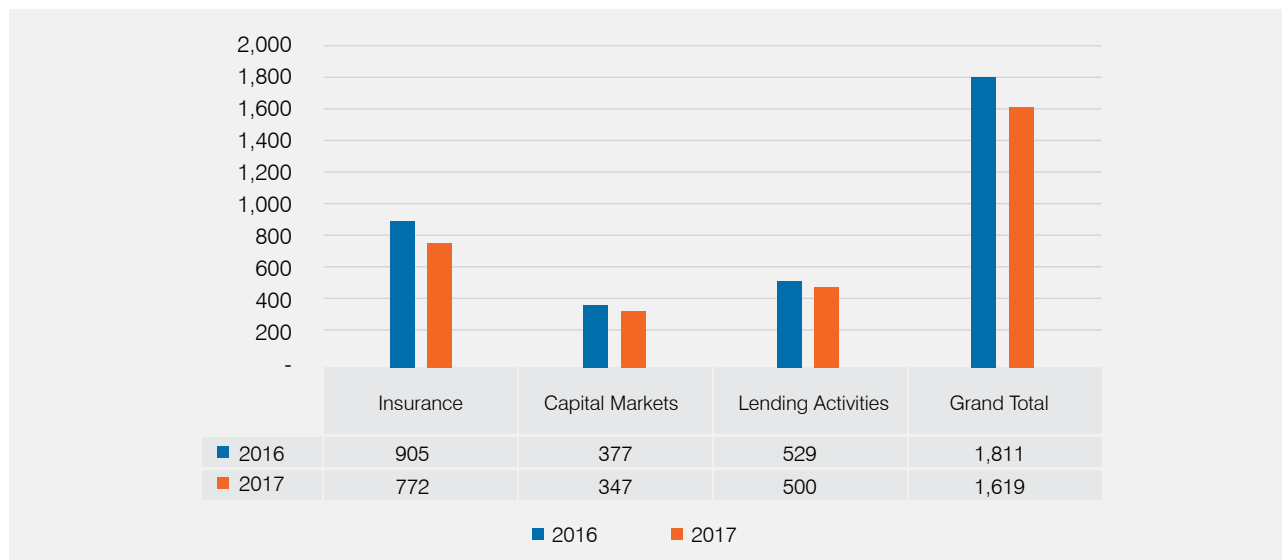


Source: NBFIRA

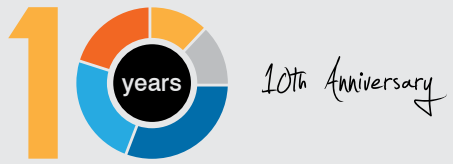
The NBFi sector remained profitable, recording a decrease in profits to P1.6 billion in 2017, compared to P 1.8 billion in 2016 (see Figure 11). Profits in 2017 were mainly attributed to the Insurance industry, which contributed 52% of profits, followed

by lending Activities with 25% and lastly capital markets with 23%. Returns made in the investment of retirement funds are not included.

Figure 11: Profit and Loss Statement of NBFIs for the Year ending December 31



Source: NBFIRA



Insurance

Insurance

INSURANCE

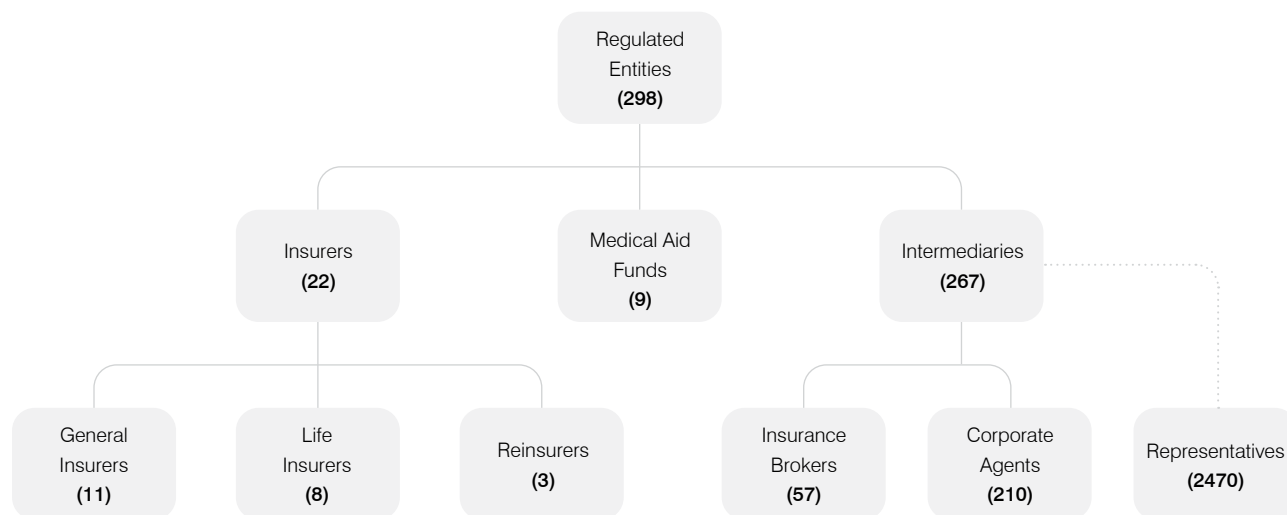
The Regulatory Authority, through the Insurance Department, supervises and regulates insurers, reinsurers, medical aid funds and insurance intermediaries. **The Regulatory Authority** is guided by the NBFIRA Act (2016), the Insurance Industry Act (1987) and the International Insurance Act (2005). Currently, there is no Medical Aid legislation, but the medical aid funds have been given exemptions to allow them to operate the business of medical aid, whilst awaiting the promulgation of the regulatory framework for the sector.

life insurers, 11 non-life insurers and three (3) non-life reinsurers. In addition, there were nine (9) medical aid funds, with one medical aid having had their exemption revoked. There are also intermediaries, which consist of 57 insurance brokers, and 210 corporate agents. However, there were 2,470 individual representatives which were engaged by the insurers, but monitored by **the Regulatory Authority** through quarterly submissions of register of representatives. The composition of the insurance industry is illustrated in Figure 12 below.

Industry Overview

As at March 31, 2018, **the Regulatory Authority** regulated 298 entities which comprised of 22 insurers, of which eight (8) were

Figure 12: Structure of the Insurance Industry as at March 31, 2017.



Source: NBFIRA

Licensing

During the period under review, **the Regulatory Authority** licensed, six (6) insurance brokers and 50 corporate insurance agents. Table 11 below shows the total number of licensed entities during the period under review and the prior year.

funds. Of the nine (9) medical aid funds, one of them is under curatorship due to issues of capitalization. In addition, two (2) insurers merged their insurance business in both life sector and non-life insurance.

The insurance sector has experienced 21% growth, recording a net increase of 52 entities from 246 in 2017 to 298 in 2018. This includes the revoked medical aid fund which reduced the number of licensed medical aids slightly from 10 to 9 medical

Insurance (cont.)

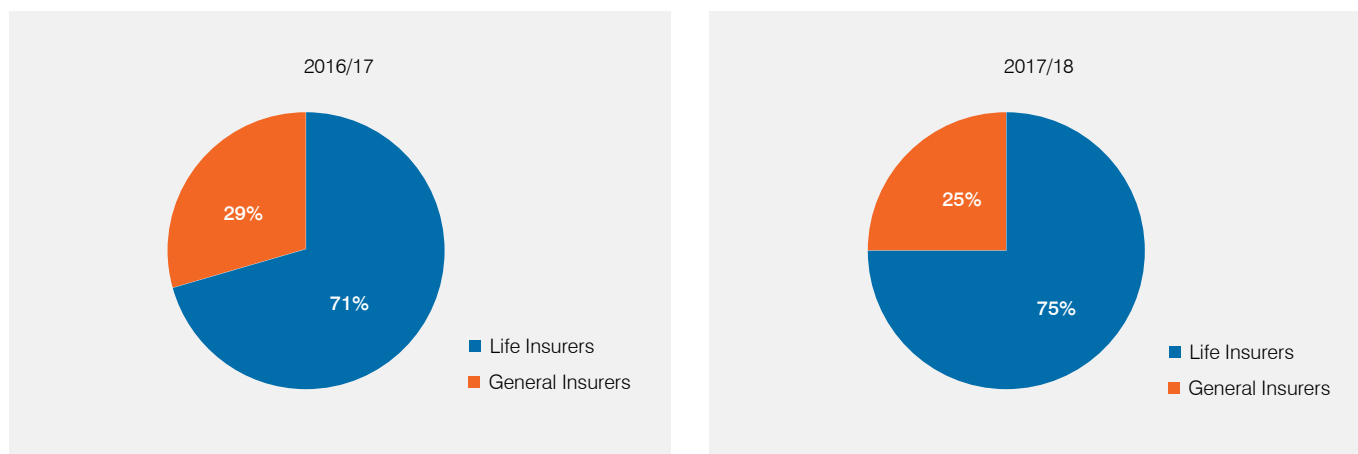
Table 11: Number of Licenses Issued in the Financial Year

Type of NBFI	2017	New licenses	Withdrawals/ Dissolutions	2018	% Change
Insurers					
Reinsurers	3	0	0	3	0
Life Insurers	9	0	1	8	-11
General Insurers	12	0	1	11	-8
Sub Total (Insurers)	24	0	2	22	-8
Medical Aids Funds	10	0	1	9	-10
Intermediaries					
Insurance Brokers	51	6	0	57	12
Corporate Insurance Agents	161	50	1	210	30
Sub Total (Intermediaries)	212	56	1	267	26
Grand Total	246	56	4	298	20

Source: NBFIRA

Financial Overview of the Insurance Sector Segmentation between General and Life

Figure 13: Market share of Gross Written premium (%)



Source: NBFIRA

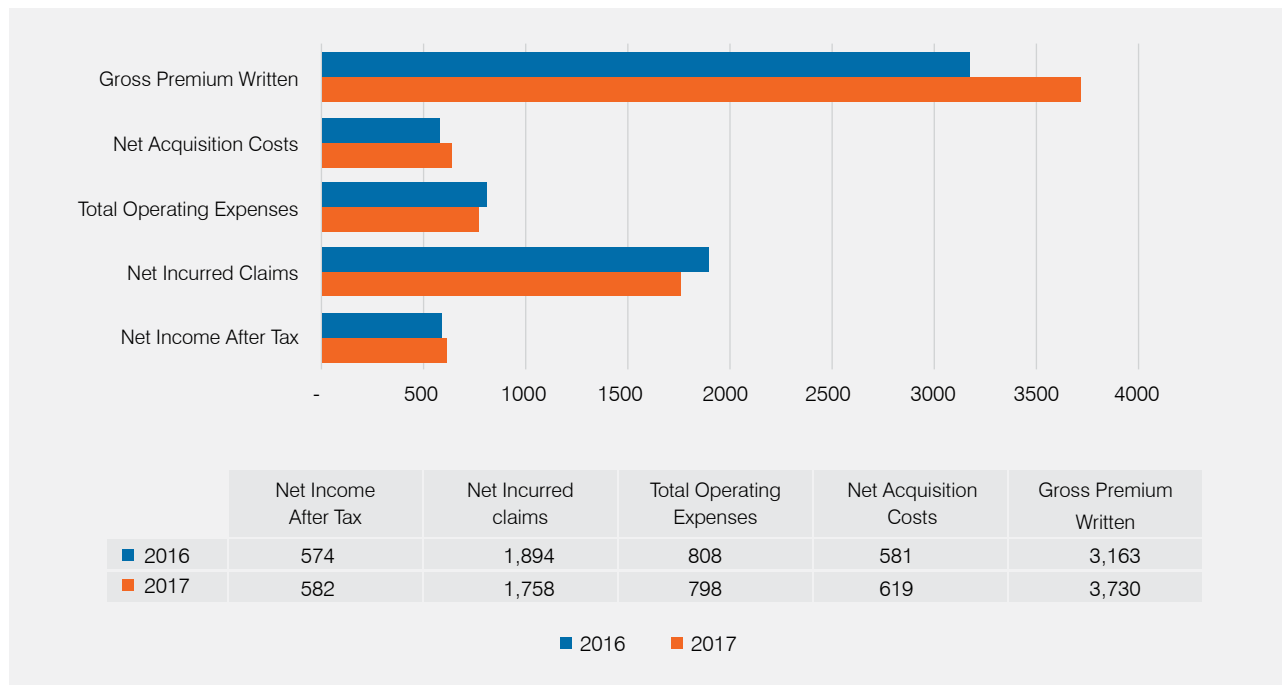
Life Insurance

The total gross written premium generated through the life insurance sector amounted to P3.7 billion in 2017 compared to P3.2 billion in 2016, an increase of 16%. Income After Tax for the life sector during

the fiscal year is reported at P582 million, being a slight increase of 1.4% from P574 million in the previous reporting period (see Figure 14).

Insurance (cont.)

Figure 14: Abridged Statement of Comprehensive Income for Life Insurance Sector



Source: NBFIRA

Life and Annuity accounts for 99.9% of the P 3.7 billion Gross Premium written during the year under review. Table 12 below shows the year on year change in the different classes of life insurance business written during the year.

compared to 15.1% in the prior year. Figure 15 below depicts the compressed statement of financial position for the life insurance sector as at December 2017.

Table 12: Gross Written Premium of Life Insurers per Class (P000)

Class	2017	2016	% Change
Life and Annuity	3,727,695	3,161,136	18
Linked Long Term	0	613	(-100)
Permanent Health	2055	974	110
Total	3,729,750	3,162,724	18

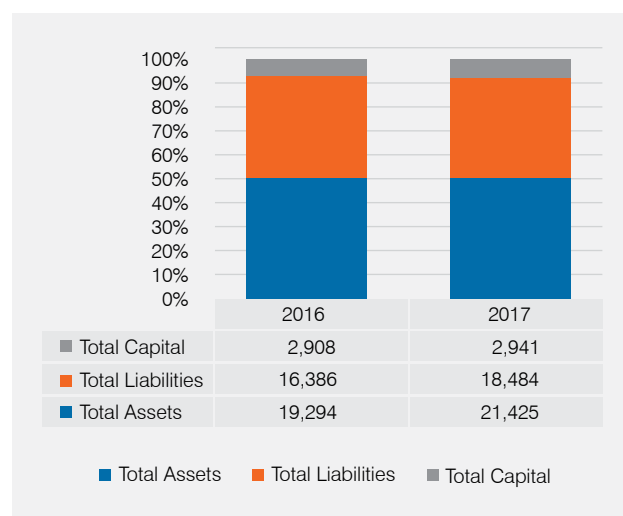
Source: NBFIRA

Life Insurance Financial Performance

Statement of Financial Position

The total assets held by Life insurance companies as at the end of the current financial year has increased as compared to the prior year to P21.4 billion from P19.3 billion, which is an increase of 11%. Total liabilities constituted 86.3% of total assets as at December 2017, compared to 84.9% in the prior year, while capital and reserves accounted for 13.7% of total assets

Figure 15: Compressed Statement of Financial Position for the Life Insurance Sector (BWP Millions)



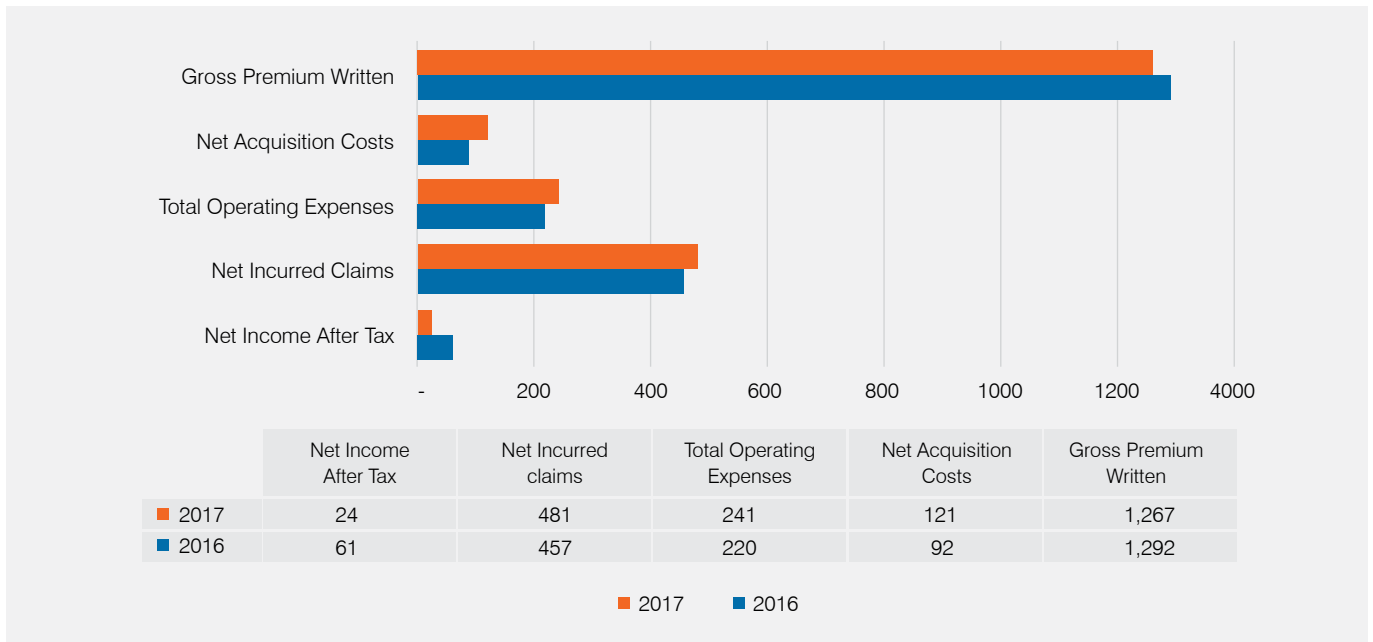
Insurance (cont.)

Non-Life Insures

The gross premium written was relatively stable at P1.3 billion in 2016 and 2017. Net income after tax decreased from P61.1 million in 2016 to P23.6 million in the year under review as a result of losses made by some of the large industry players. This is a significant

drop of 61.4%. Factors that contributed to this drop in net income after tax were an increase in claims, net acquisition costs and other expenses. Figure 16 below shows the compressed statement of comprehensive income for the non-life sector.

Figure 16: Abridged Statement of Comprehensive Income for Non-Life Sector (BWP Millions)

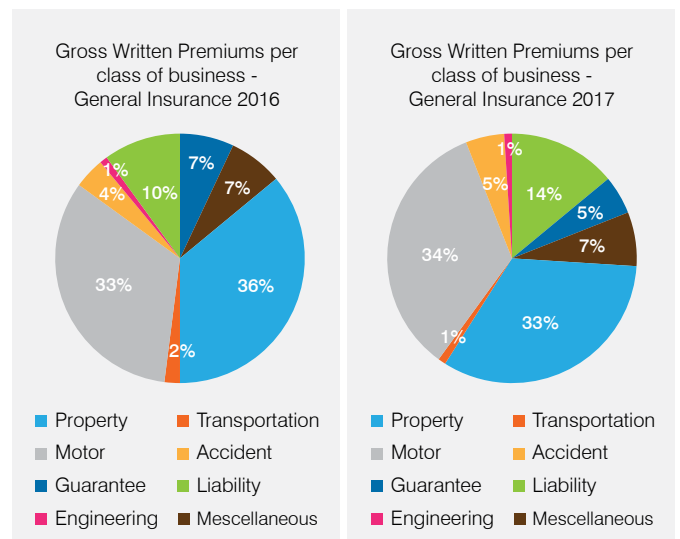


Source: NBFIRA

Gross Written Premiums by Class of Business

During the review period, Motor business accounts for the largest share in terms of the gross written premiums by class of business at 34%, compared to a share of 33% in the prior year, followed closely by Property at 33%, compared to a share of 36% in the prior year. Liability is at 14% compared to 10% in the prior year. Other businesses shared the remaining 19%. The market share of gross written premiums by individual classes is presented in Figure 17 below:

Figure 17: Gross Written Premiums by Class of Business



Source: NBFIRA

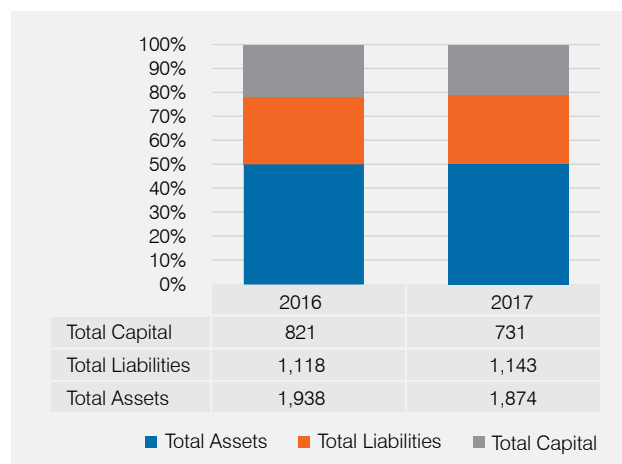
Insurance (cont.)

Statement of Financial Position

During the period under review, the non-life total assets remained at P1.9 billion as was recorded in the prior year. As at the end of the year, the total liabilities accounted for 61% of the total assets whereas total capital and reserves comprised 39% of the total assets.

The proportion of capital to total assets has worsened over the last two years and the proportion of liabilities to capital has increased at a rate of 1.9%. Figure 18 below presents the position of non-life insurers' condensed balance sheet on a year to year basis.

Figure 18: Abridged Statement of Financial Position for Non-Life Sector (BWP Million)



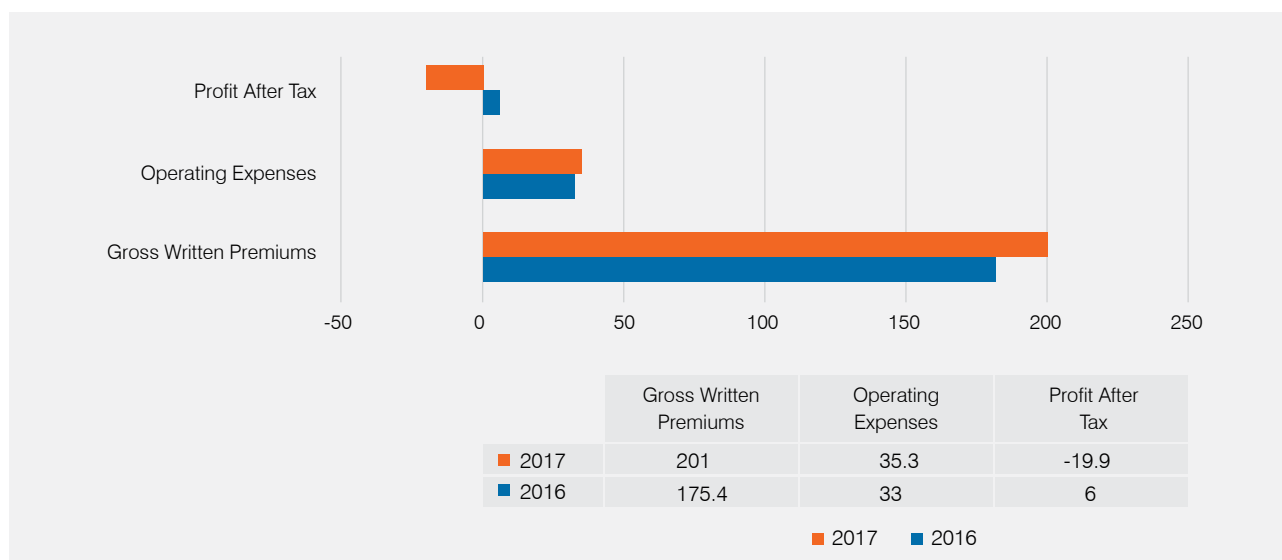
Source: NBFIRA

Reinsurers

All the three (3) reinsurers currently licensed in Botswana are non-life reinsurers. The gross written premiums generated in 2017 by reinsurers amounted to P201 million compared to P175.4 million in the prior year, which is an increase of 14.6%. This indicates that the local reinsurers continue to grow in capacity to absorb more risk. The Profit after tax continued the downward spiral, decreasing to a loss of P19.9 million in 2017

compared to a marginal profit of P6 million in 2016. The loss was due to underwriting losses made by some of the industry players. This indicates that a substantial amount was recovered from reinsurers. Total operating expenses increased marginally to P35.5 million in 2017 compared to P33 million in 2016. Figure 19 below shows a compressed statement of comprehensive income for reinsurers:

Figure 19: Abridged Statement of Comprehensive Income for Reinsurers

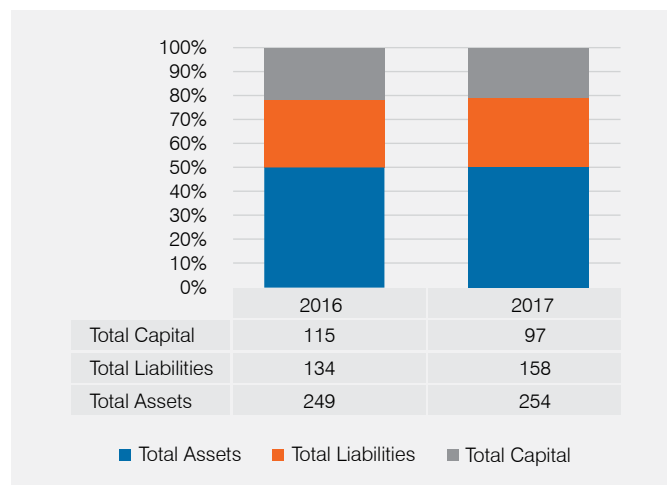


Source: NBFIRA

Insurance (cont.)

The total assets of non-life reinsurers increased marginally by 2% in 2017 compared to an increase of 6.4% recorded in the previous review period. Total liabilities saw an 18% increase from P134 million in 2016 to P158 million during the current reporting period. Reserves grew by 14.8% from P12.4 million in 2016 to P14.3 million during the current review period, while retained earnings decreased by 199% from P11.1 million in 2016 to a loss of P10.9 million in 2017. The proportion of total liabilities to total assets increased from 54% in 2016 to 62% in 2017, while the proportion of total capital to total assets declined from 46.4% in 2016 to 38% during the current review period. Figure 18 below shows a condensed statement of financial position for reinsurers.

Figure 20 Abridged Statement of Financial Position for Reinsurers



Source: NBFIRA

Insurance Brokers

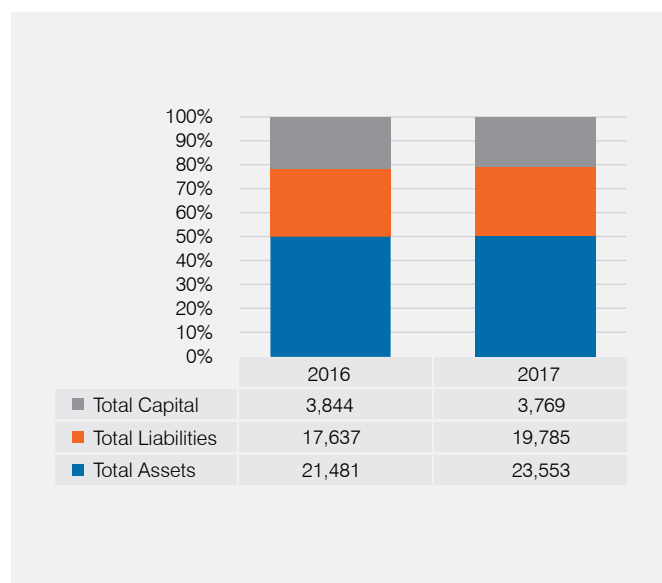
Total revenue generated by insurance brokers amounted to P365.2 million, which comprises commission earned and additional revenue. The total revenue decreased by 4.9% from P384 million in the prior year. Commission earned by insurance brokers increased by 11.2% from P232 million in 2016 to P258 million in 2017. An additional revenue, which is mainly income earned from other sources, decreased by 28.9% from P152 million in 2016 to P108 million in 2017. Profit after tax decreased by 60% from P91.7 million in 2016 to P36.3 million in the current review period. The reason for the decrease in profit after tax could be attributed to reduced profit by the big industry players.

The total assets of insurance brokers showed a decline from P393 million as reported in 2016 to P380 million as reported during the period under review.

Insurance Industry Financial Position Summary

The life insurance sector continues to dominate the insurance industry as it accounts for the largest share of assets as well as the gross written premiums. Total liabilities account for 84% of total assets held by the insurance industry in 2017, compared to 82% in the prior period whereas capital and reserves account for 15.9% of the total assets held in 2017 compared to 17.9% in the prior year (see Figure 21).

Figure 21: Abridged Financial Position of Insurance Industry



Source: NBFIRA

Market Impact Assessment

The contribution of the insurance sector to the economy remained constant at 3% as there was a nominal increase in the gross written premium from P4.5 billion in 2016 to P5 billion in the current year. In addition, the total asset base for the insurance sector (reinsurers and insurers) increased nominally from P21.5 billion in 2016 to P23.6 billion in the year under review.

Capital Requirements

The Insurance Industry Act (1987) requires that Insurance entities maintain a minimum capital requirement of P2 million for insurers/reinsurers and P30 thousand for insurance brokers. A life insurer is considered financially sound when its assets exceed liabilities, whereas, a short term insurer is considered to be financially sound when its solvency ratio is 125%. Corporate agents are not required to maintain a minimum statutory capital.



Insurance (cont.)

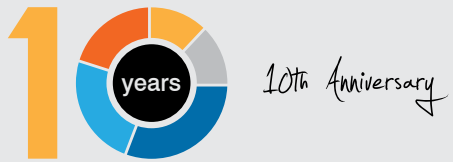
During the year under review, the insurance players maintained a good level of capital adequacy and solvency except for a three (3) entities which fell below the expected levels. However, all those that were below the required levels corrected their situation except for one which had to be closed.

Medical Aid Funds:

During the reporting year, *the Regulatory Authority* did not register any new Medical Aid Fund, instead one Fund had its exemption revoked for failure to abide by the conditions set out in the exemption letter. The Medical Aids Funds are currently regulated and supervised under the NBFIRA Act (2016) and are classified as non-bank financial institutions, hence, the need for the development of the regulations of the sector. The development of the Medical Aid Funds regulations is still in progress.

The principal membership of these funds stood at 140,182 compared to 150,997 reported during the prior year, a decrease of 7.2%. The sector also recorded a reduction in total membership base of 328,788 lives covered as compared to 346,399 lives reported in the prior year reflecting a 5.1% decrease from the prior year. This decrease in membership could be as a result of the closing down of some mining operations around the country as well as retrenchments by other significant employers.

As at the end of the financial year, medical aid funds recorded total asset base of P943.4 million against P875.4 million in the previous review period. This was an increase of 7.8%. Total liabilities decreased to P221 million in the current year against P298 million recorded in the prior period.



Retirement Funds

Retirement Funds

RETIREMENT FUNDS

The Regulatory Authority, through Retirement Funds Department, regulates and supervises Retirement Funds (Pension and Provident Funds) and related businesses (Fund Administrators). These financial institutions are regulated and supervised in terms of the NBFIRA Act (2016); the Retirement Funds Act (2014) and its Regulations of 2016, which repealed the Pension and Provident Funds Act (1987). The Retirement Funds Act (2014) and its Regulations were effected in April 2017.

Licensing Status

As at the financial year end of March 31, 2018, the number of licensed Retirement Funds remained at 86, despite the licensing of three (3) new retirement funds, which included an Umbrella

Fund, a Preservation Fund and a Beneficiary Fund. Three (3) Standalone Funds were transferred to existing Umbrella Funds during the period under review, hence, the constant figure of 86 Retirement Funds. The aforementioned number of Retirement Funds includes, six (6) Umbrella Funds, which had collectively registered 285 sub-funds as at March 31, 2018 from 267 recorded in March 31, 2017 (see Table 13).

As at March 31, 2018, there were three (3) pension fund administrators operating in Botswana, of which one of the three administrator’s application for licensing is still being assessed, following the commencement of the new Retirement Act (2014), which required the licensing of fund administrators.

Table 13: Number of Licensed Entities of Retirement Funds Sector as at March 31, 2018

Funds	March 2017	New Licenses	Dissolution/Voluntary Withdrawals	Transfers Out to Umbrella Funds	March 2018	% Change
Stand Alone Funds	81	2	0	3	80	(1)
Umbrella Funds	5	1	0	N/A	6	20
Sub-total	86	3	0	3	86	0
Fund Administrators	0*	2	0	N/A	2	100
Sub Funds of Umbrella Funds	267	21	3	N/A	285	7

Note: *The two Fund administrators that were reported in March 2017 were operating under a waiver and not licensed.

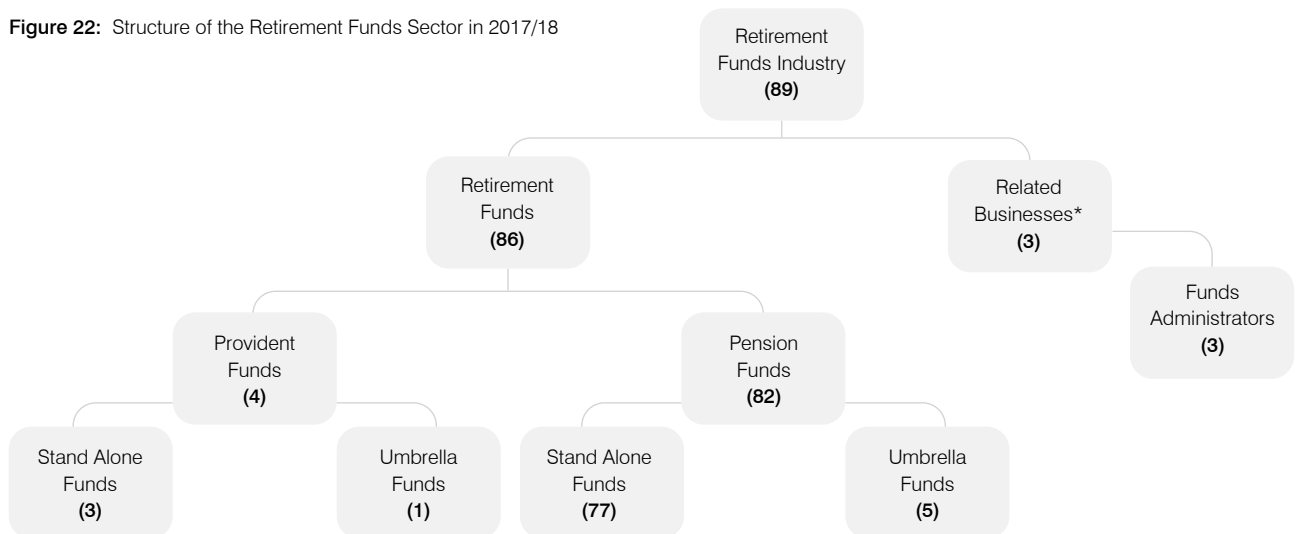
Source: NBFIRA

Relicensing of Retirement Funds under the New Act

During the review period **the Regulatory Authority** commenced the relicensing of existing pension funds in terms of Section 54 of the Retirement Funds Act (2014). The relicensing exercise involved re-issuing new licenses to existing funds (previously licensed

under the repealed Pension and Provident Act (1987)), revision and updating of pension fund rules, policy documents and other reforms to enhance fund governance, including pension fund boards restructuring.

Figure 22: Structure of the Retirement Funds Sector in 2017/18



Note: * other related businesses are regulated Fund Administrators. One of the three Fund Administrators is operational but not yet licensed.

Source: NBFIRA

Retirement Funds (cont.)

Membership Status

The total membership of Retirement Funds as at December 2017 was 259,301, being an increase of 8.9 %, compared to the previous year of 238,025 (see Table 14). This was mainly due to an increase in the number of participating funds (sub-funds) under umbrella funds which grew by 6.7% during the review period. The membership comprised of 230,006 active members, 17,326 deferred members and 11,969 pensioners (see Figure 23).

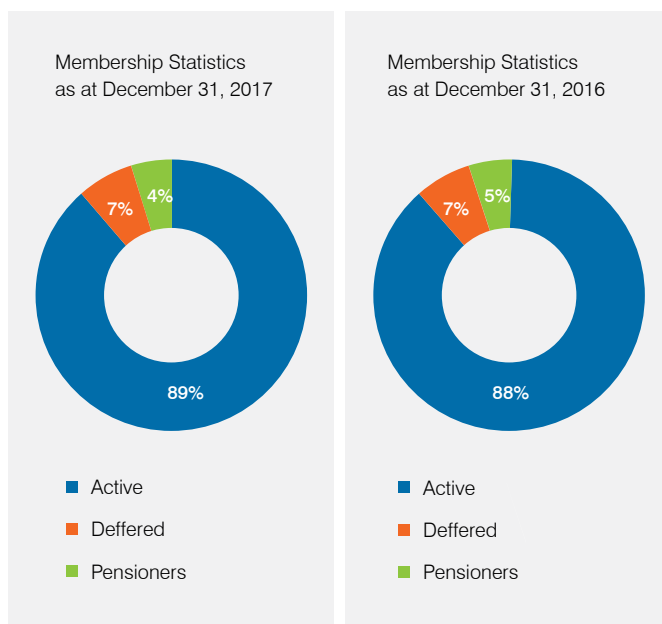
Table 14: Membership Statistics

Membership Status	Membership as December at 2017	Membership as December at 2016	% Change
Active	230 006	209 629	9.7
Deferred	17 326	16 734	3.5
Pensioners	11 969	11 662	2.6
Total*	259 301	238 025	8.9

Note * Total membership is slightly overstated as it includes deferred members who may still be active members, as well as members who are active in more than one fund.

Source: NBFIRA

Figure 23: Share of Membership Status as at December 31



Source: NBFIRA

Market Performance

During the period under review, the Retirement Funds Sector financial position remained healthy, with an increase in total income of 10.8%. This amounted to a total income of P 8.4 billion in 2017, compared to P7.6 billion recorded in 2016. Total contributions by both the employee and the employer increased slightly by 6% from P3.7 billion in 2016 to P4 billion. This was as a result of a combination of an increase in both memberships by 8.9% and general pensionable salary increases in the same period. Income on investments also increased by 23% from P3 billion in 2016 to P4 billion in 2017. The increase in investment income was mainly attributable to the continued improvement of performance in the global equities and bonds markets, which recorded growth rates of 8.3% and 21.5%, respectively, from the prior year. Benefit payments made to members and beneficiaries, on the other hand, decreased by 25% from the previous year, due to a collective effect of liquidations and exits of some sub-funds in 2017. General expenses and other fees recorded an increase of 8% from P0.6 billion in the previous year to P0.7 billion in 2017. Though there is an increase of 8% in the aforesaid expenses, **the Regulatory Authority** continues to ensure that the Retirement Funds employ cost efficient measures to keep the costs minimal and in line with the inflationary pressures (see Table 15 below).

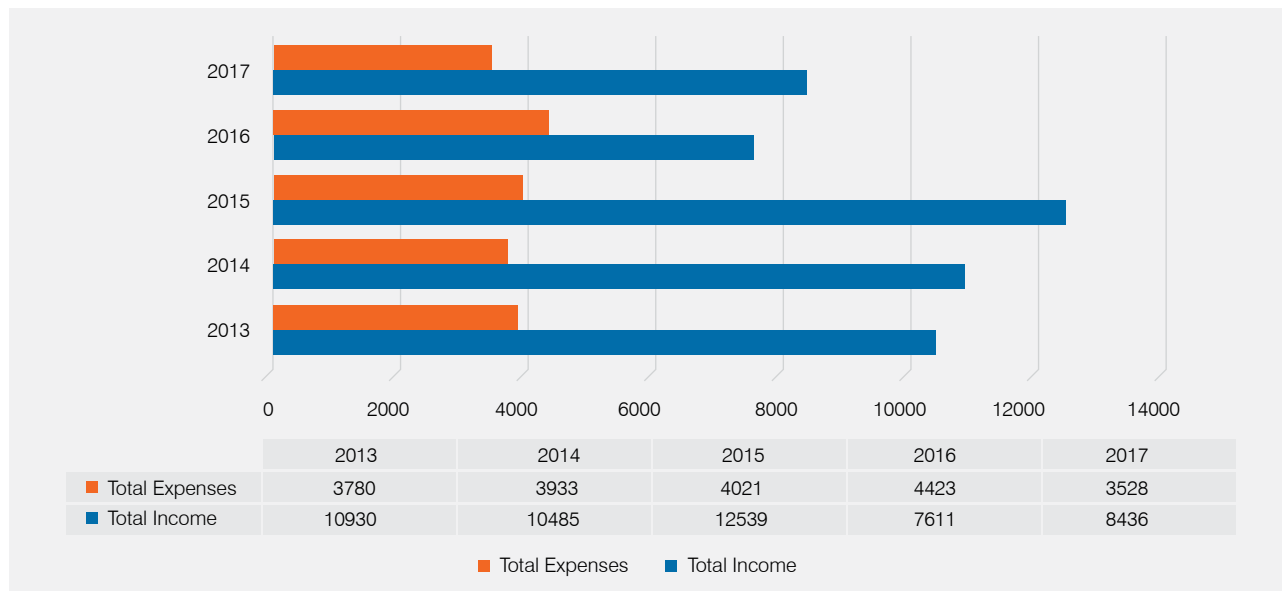
Table 15: Abridged Income and Expenditure For Retirement Funds for the period ended 31 December 2017

Income	Amount (BWP Millions) 2017	Amount (BWP Millions) 2016	% Change
Members Contributions	1,066	1,013	5.2
Employer Contributions	2,925	2,765	5.8
Amounts received on life insurances	14	7	100
Investment Income	4,108	3,328	23.4
Other Income	323	498	(35.1)
Total Income	8,436	7,611	10.8
Expenditure			
Benefit Payments	2,816	3,764	(25.2)
Administration, Management Expenses and other Fees	695	641	8.4
Insurance Premiums	17.8	18	18.7
Total Expenditure	3,528	4,423	(20.2)

Source: NBFIRA

Retirement Funds (cont.)

Figure 24: Retirement Funds Income and Expenses

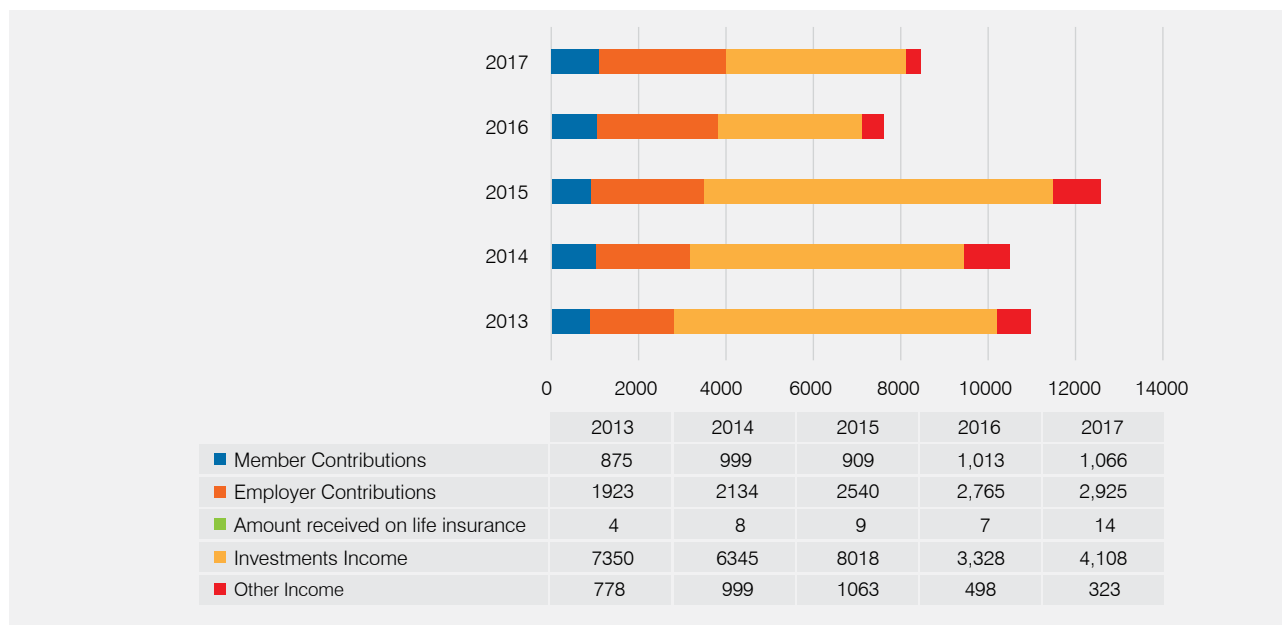


Source: NBFIRA

Figure 24 above shows a comparison between total income and expenses over the five year period from 2013 to 2017. The total income relative to total expenditure have a positive correlation save for 2017, of which such relationship was negative. Over a

two year period from 2016 to 2017, total income increased by 11% whilst total expenditure decreased by 20%. This could be due to cost containment measures employed by pension funds in 2017.

Figure 25: Retirement Funds Income



Source: NBFIRA

Retirement Funds (cont.)

Figure 24 above depicts the total income allocations for the five year period from 2013 to 2017. In 2016 and 2017, total income increased by 11%. Investment Income constitutes a larger proportion of income earned by pension funds over the periods in comparison to other income sources, followed by employer and employee contributions respectively. This shows the rigorous investment management practices that are adopted by Pension Funds in an effort to grow the industry.

Retirement Funds Investment Assets

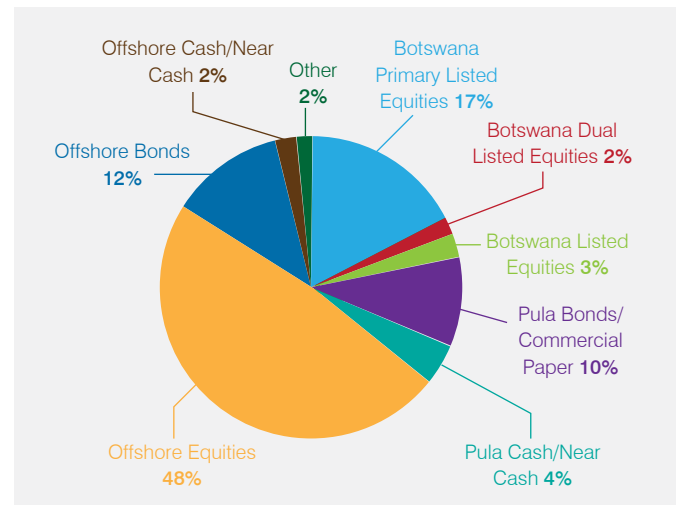
The Retirement Funds Sector continues to contribute significantly to the economy of Botswana, with a total assets to GDP ratio of 45% as at December 2017, compared to 44% the previous year. Table 16 below shows that the assets held by Retirement Funds as at December 31, 2017 amounted to P82 billion being an increase of 9.2% from the previous year of P75.1 billion. The growth in retirement funds assets was mainly due to an increase in the performance of investment markets, together with the growth in membership and contributions. Offshore Cash assets increased by nine (9) fold due to introduction of offshore limits within Pension Fund Rule 2(PFR2).

Table 16: Retirement Funds Assets Allocation as at December 31

	BWP (Million) 2017	BWP (Million) 2016	% Change
Botswana Primary Listed Equities	14,189	13,898	2.1
Exchange Traded Funds	411	409	0.3
Botswana Unlisted Equities	2,070	2,082	(0.6)
Pula Bonds/Commercial Paper	8,021	8,169	(1.8)
Pula Cash/Near Cash	3,596	2,760	30.3
Botswana Property	370	371	(22)
Sub-Total Domestic Investments	28,657	27,690	3.5
Offshore Equities	39,418	36,795	7.1
Dual Listed Equities	1,527	2,281	(33.1)
Offshore Bonds	9,934	8,176	21.5
Offshore Cash/Near Cash	1,874	187	904.7
Alternative Investment	594	0	100
Sub-Total Offshore Investments	53,346	47,438	12.5
TOTAL	82,004	75,129	9.2
Offshore/onshore asset split	65/35	63/37	-

Source: NBFIRA

Figure 26: Percentage share of Retirement Funds Assets as at December 2017

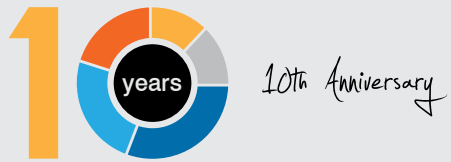


Source: NBFIRA

Total equities accounted for 70% of the pension fund assets under management, comprising Botswana listed equities of P14.2 billion, Botswana unlisted equities of P2.1 billion, Botswana dual listed equities of P1.5 billion and offshore equities of P 39.4 billion. Total bonds accounted for 21.9% comprising of domestic Bonds of P 8 billion and offshore bonds of P 9.9 billion. Cash and near cash accounted for 6% of funds comprising of P 3.6 billion in domestic currency and an equivalent of P1.9 billion in foreign currencies, while the remaining P 1.4 billion or 2% of total assets were held in Exchange Traded Funds, Local Property and Alternative Investments. The assets allocation pattern has changed for offshore investments, with an increase in allocation of offshore cash by more than 100% in 2017, while allocation to offshore equities have increased by 7% in the same review period. This reflects growth across the global economy compared to the local market. The increase in allocation to offshore investments was mainly due to expansion in the global economy which resulted in an improvement in performance of offshore equity.

Offshore/Onshore Asset split

On December 1, 2000, an Investment Rule which allowed Pension Funds to invest up to 70% of their assets offshore was introduced through a Directive by the then Ministry of Finance and Development Planning. The provisions of the PFR2 also allow Retirement Funds to invest up to 70% of their assets in offshore markets. As at December 31, 2017 offshore investments of retirement funds were P53.3 billion or 65% of total pension assets while local assets accounted for P 28.7 billion or 35%. As at December 31, 2016, offshore investments of retirement funds were P 47.4 billion or 63% of total pension assets while local assets accounted for P 27.8 billion or 37%.



Capital Markets

Capital Markets

CAPITAL MARKETS

The Regulatory Authority through Capital Market Department regulates and supervises securities businesses and collective investment undertakings and is empowered by the NBFIRA Act (2016), the Securities Act (2014) and the Collective Investment Undertakings (CIU) Act (1999). Following the commencement of the Securities Act (2014), Securities (Institutions Licensing) Regulations (2017) and Securities (Persons Operating a Securities Infrastructure Business) Regulations (2017), on April 1st 2017, **the Regulatory Authority** replaced all the exemption letters with temporary licenses. This exercise was aimed at preventing contraventions to Section 3 of the Securities Act (2014) and Regulation 4 of the Securities (Persons Operating a Securities Infrastructure Business) Regulations (2017), which requires entities to be licensed. The temporary licenses were issued for a period of 12 months, to accord regulated entities to prepare for application of licenses.

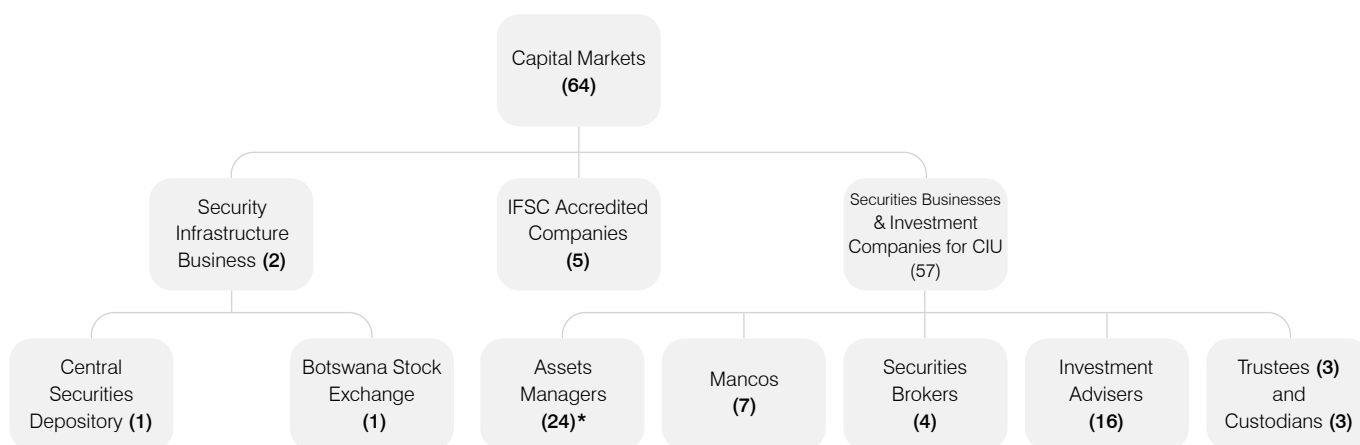
Industry Overview

The Regulatory Authority, under Capital Markets sector, adopted a regulatory framework which includes; the CIU Act (1999) and

Securities Act (2014). The CIU Act (1999) oversees Management Companies for CIUs (Mancos), Foreign licensed funds, Trustees for CIUs, CIU custodians, and Investment Companies. On the other hand, the Securities Act (2014) oversees the Securities Businesses and the Securities Infrastructure Businesses (SIBs). Securities Business includes Asset Manager, Securities Brokers, Investment Advisers, Transfer Secretaries, Custodians and Market Markers, while the Securities Infrastructure Business comprises Securities Exchanges, Central Securities Depositories, Central Counterparty and Clearance and Settlement Systems, other than the central securities depositories.

Figure 27 below shows the Capital Markets Structure, which comprises two (2) SIBs, which are; the BSE and the CSDB, four (4) securities brokers that are members of the BSE. **The Regulatory Authority** had seven (7) licensed Mancos, three (3) trustees and three (3) custodian banks, sixteen (16) investment advisers, twenty four (24) asset managers, and five (5) IFSC accredited entities as at March 31st 2018 (see Figure 27).

Figure 27: Capital Markets structure



* Includes two (2) Private Equity firms and 2 Investment company with variable capital

Source: NBFIRA

Capital Markets (cont.)

Licenses and Exemptions

Table 17: Licences Issued as at March 31, 2018

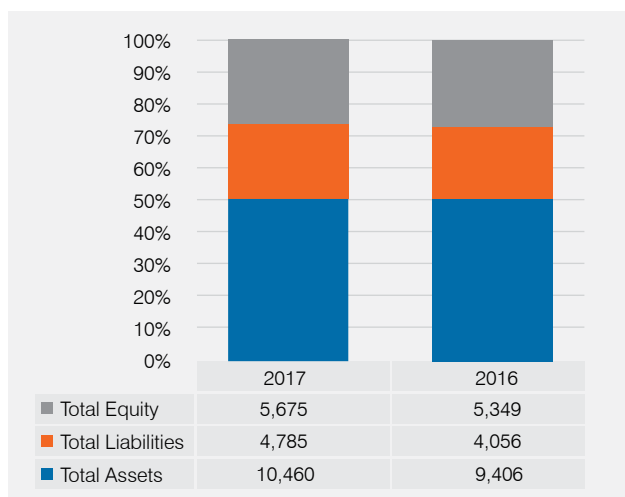
Type of Securities Business	2016	New Licence and Exemption	Withdrawals / Dissolutions	2017	(%) Change
Securities Brokers	4	0	0	4	0
Securities Exchange	1	0	0	1	0
Central Securities Depository	1	0	0	1	0
IFSC accredited entities	7	0	2	5	29
Asset Managers	14	8	0	22	57
Investment Advisers	13	3	0	16	23
Management Companies for CIUs	5	2	0	7	40
Investment Company with Variable Capital	2	0	0	2	0
Trustees for CIUs	3	0	0	3	0
Custodians	3	0	0	3	0
Market Maker	0	0	0	0	0
Total	53	13	2	64	21

Source: NBFIRA

The number of licensed entities in the year under review is 64 as compared to 53 licenses issued in 2017, resulting in 21% increase. This increase is as a result of a significant record of new licenses by Asset Managers following an introduction of the BPOPF incubation program that promoted participation of locally owned asset managers in the market. Two (2) IFSC accredited companies voluntarily exited the market during the reporting period.

IFSC Accredited Entities

Figure 28: Abridged Statement of Financial Position for IFSC Accredited Entities (BWP Million)

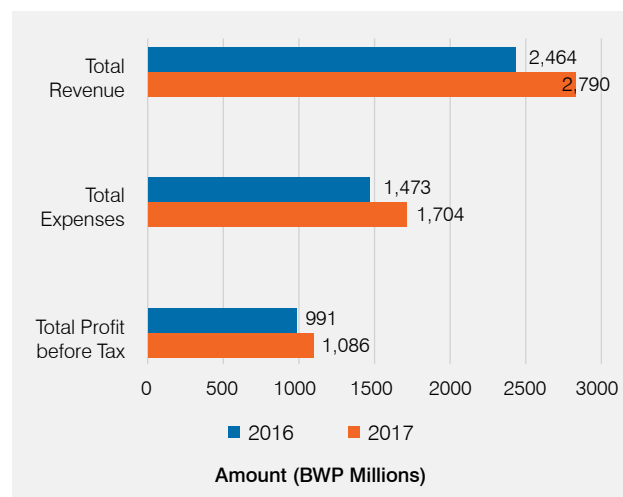


Note: The 2016 figures have been restated and therefore differ from the previous publication

Source: NBFIRA

The consolidated Balance sheet for IFSC accredited entities depicted in Figure 28 shows a strengthening of their asset base, having recorded an 11% increase. This is despite one of the entities being wound up during 2017. This increase in assets was financed through a combination of liabilities and equity, as can be seen by the 6% increase in equity, and an 18% increase in liabilities. The liabilities are largely due to increases in borrowings during the 2017 financial year from P3.39 billion to P3.98 billion. The borrowings are mainly from one entity for purposes of expanding their business throughout Africa.

Figure 29: Abridged Statement of Comprehensive Income for IFSC Accredited Entities (BWP Million)



Note: The 2016 figures have been restated and therefore differ from the previous publication

Source: NBFIRA

Capital Markets (cont.)

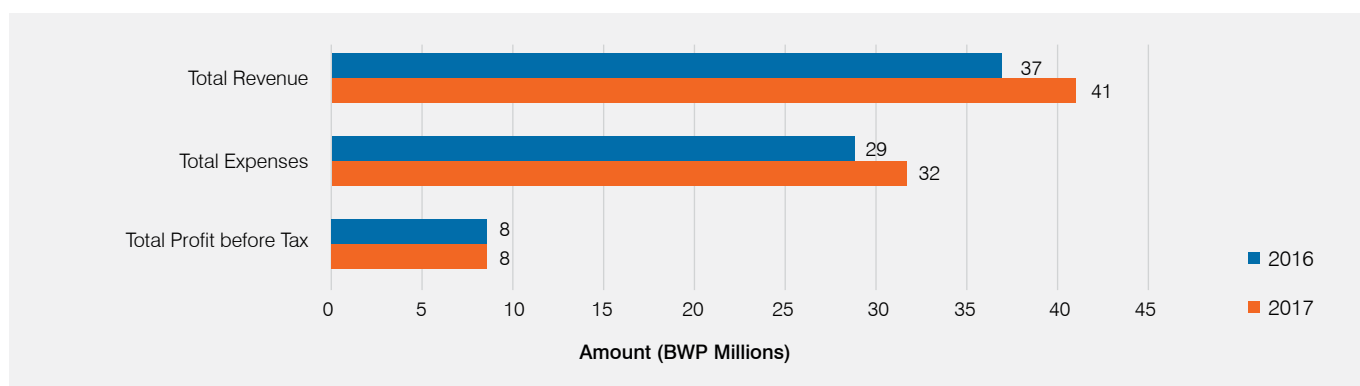
The consolidated statements of comprehensive income for IFSC accredited entities show slight improvement in profitability during 2017. As can be seen in Figure 29 above, total revenue increased by 13.2% from P2.5 billion in 2016 to P2.8 billion in 2017. Similarly, profits before tax increased by 9.6% from P 1 billion in 2016 to P1.1 billion in 2017. In 2017, expenses were 15.7% higher than in 2016 mainly due to higher employee benefits as well as consultancy and professional fees, which grew by 18.8% and 39.0% respectively.

Securities Infrastructure Businesses (SIBs)

Whilst the CSD recorded a decrease in both revenues and profit for the financial year 2016/17, the BSE on the other hand, recorded

an increase in both revenues and profit for the same review period, improving the collective performance of the SIBs. Total income for the SIBs increased by 10.2%, from P36.9 Million in 2016 to P40.7 Million in 2017, with the BSE contributing 81% of the total income while the CSD constituted 19%. The SIBs' good performance can be attributed to a number of developments, amongst others; increase in Listing and annual sustaining fees for the BSE. Figure 30 below shows the statement of comprehensive income for SIBs.

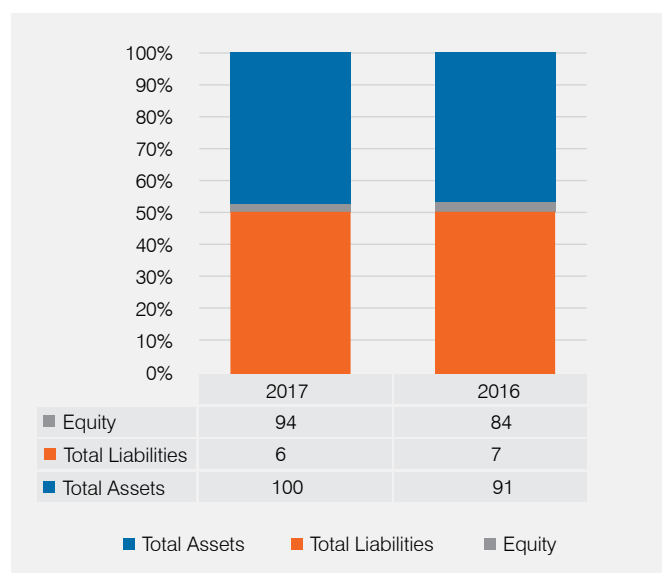
Figure 30: Compressed Statement of Comprehensive Income for SIBs (Millions)



Source: NBFIRA

The consolidated statement of financial position for the SIBs remained healthy, with total assets exceeding total liabilities by a significant margin, of P94 Million. Current assets increased while current liabilities decreased which resulted in a positive development for the liquidity of the SIBs, hence a 14% increase in current ratio in the year under review, compared to 12.2% in the previous year. Figure 31 below shows the statement of Financial Position of SIBs

Figure 31: Abridged Statement of Financial Position of SIBs as at December 31



Capital Markets (cont.)

Assets Under Management (AUM) of Investment Institutions (Asset Managers and Management Companies)

As shown in Figure 32 below, total Assets Under Management (“AUM”) of Investment Institutions as at December 31, 2017 amounted to P52.5 billion, which is a slight increase of 4% from the P50.5 billion recorded in the previous year. Moreover, both CIU and Non-CIU assets under management increased by 9% and 3%, respectively.

Figure 32: AUM of Investment Institutions by type for the Year Ending December 31

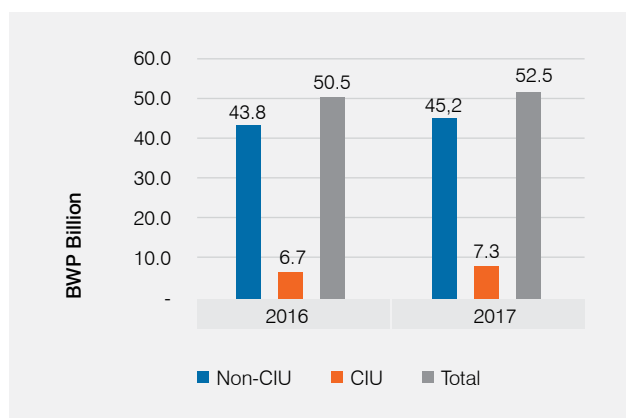
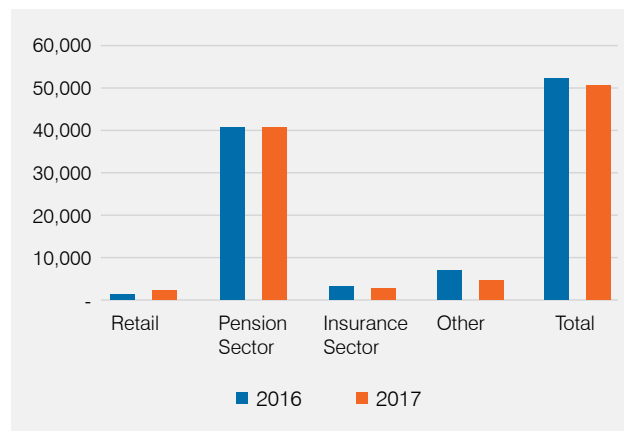


Figure 33 below shows the distribution of AUM of Investment Institutions by Client Type as at December 31, 2017. The 4% increase in total AUMs of Investment Institutions was a result of 49% increase in AUMs of other institutions, 20% increase in insurance and a significant decline in retail sector by 49%. Although Pension recorded an insignificant increase, it holds a major share of 78% of total AUM as at December 31, 2017.

The total assets for the Pension increased to P40.8 billion in 2017, from P40.7 billion in 2016. On the other hand, the Insurance sector experienced an increase of 20% from P2.8 billion in 2016 to P3.3 billion during the 2017 financial year which is placed in the second position. Furthermore, the retail sector decreased by 41% from P2.3 billion to P1.4 billion in the reporting period. Other institutional clients' AUM increased by 49% from P4.7 billion recorded in the previous year to P7.0 billion in the current year. Non-CIU AUM's experienced a growth of 3% during the current review period from P43.8 billion in 2016 to P45.2 billion in 2017. The growth is attributed to local asset managers securing mandates from local investors as well as growth in the number of licensed asset managers.

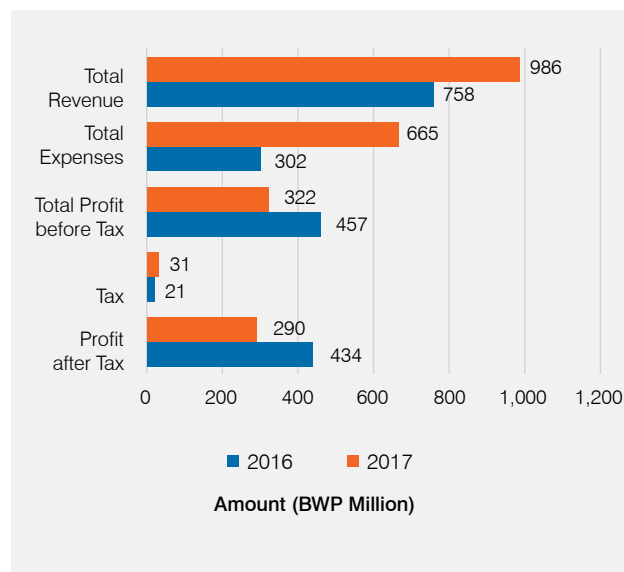
Figure 33: Distribution of AUM of Investment Institutions by Client Type as at December 31



Financial Performance of Investment Institutions (Asset Managers and Management Companies)

Figure 34 below shows that the Investment Institutions sector's total revenue increased by 30% from 758 million in the previous year to P986 million in the current period. On the other hand total expenses increased from P302 million in 2016 to P665 million in 2017, a 120% increase. The increase in expenses led to net profit after tax for the sector declining drastically by 33% from P434 million in 2016 to P290 million.

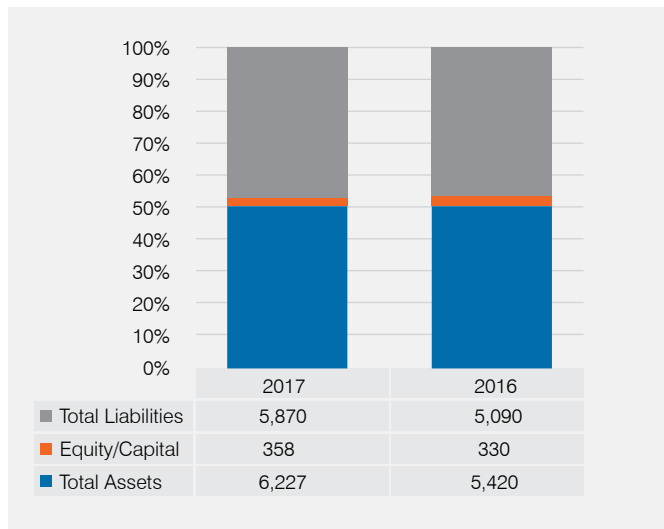
Figure 34: Abridged Statement of Comprehensive Income for Investment Institutions for the Year Ending



Capital Markets (cont.)

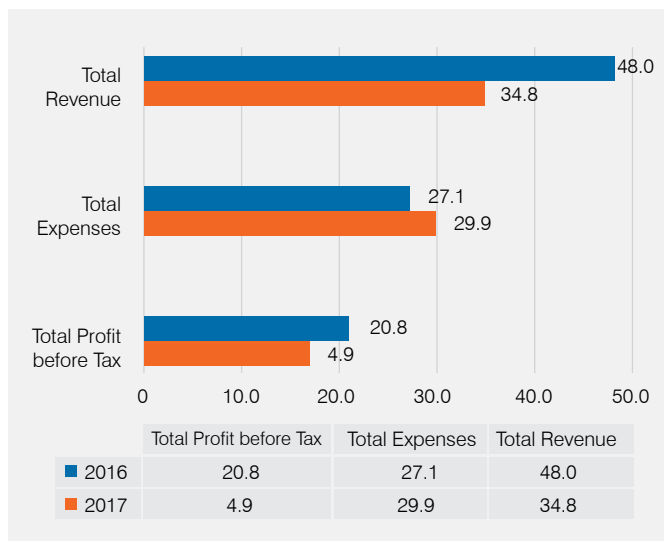
The general Investment Institutions sector recorded an increase of 15% in total assets from P5.4 billion in the previous year to P6.2 billion in the current review period. The increase in total assets is mainly attributed to market growth. The total liabilities also increased by 15% to P5.9 billion in 2017, from P5.1 billion recorded in 2016. During the reporting period, capital for the sector increased by 9% from P0.3 billion in 2016 to P0.4 billion during the period under review.

Figure 35: Abridged Statement of Financial Position of Investment Institutions (BWP Million)



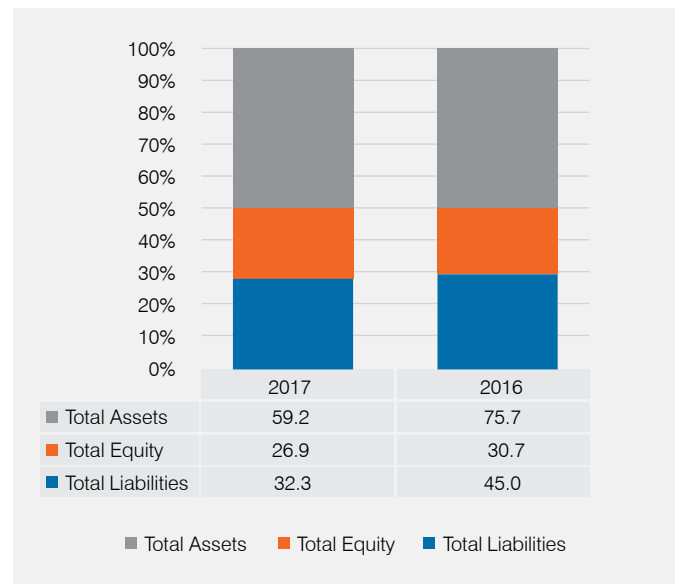
Brokers

Figure 36: Abridged Statement of Comprehensive income for Securities Brokers (BWP Million)

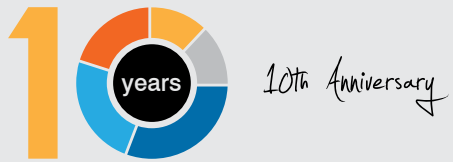


There was considerable decline in revenue from P48.0 million in 2016 to P37.8 million in 2017. In the course of 2017 expenses increased by 10.3% to P29.9 million as compared to P27.1 million in the previous year. The overall profit for the year declined by 76.5% from P20.8 million in 2016 to P4.9 million in 2017. The significant decline in profit was mainly due to higher profit based resulting from the issuers of BTC shares in 2016.

Figure 37: Abridged Statement of Financial Position for Securities Brokers (BWP Millions)



In comparison to 2016, the consolidated assets for brokers decreased by 21.8 % from P75.7 million to P59.2 million in 2017. On the positive, liabilities declined by 28.2% from P45.0 million in 2016 to P32.3 million in the period under review. The combined equity for the brokers dropped by 12.5% from P30.7 million in 2016 to P26.9 million in 2017 (see Figure 37).



Lending Activities

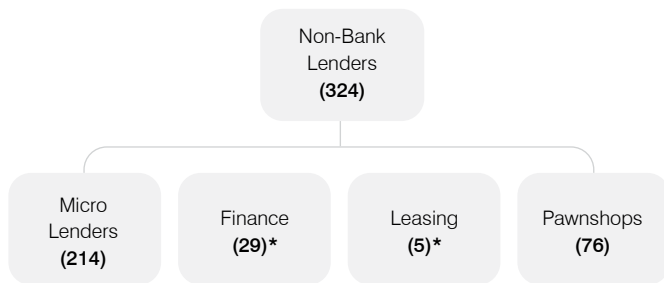
Lending Activities

LENDING ACTIVITIES

Under Lending Activities, **the Regulatory Authority** is responsible for the regulation and supervision of Micro-Lenders, Pawnshops, Finance and Leasing Companies as mandated by the NBFIRA Act (2016). In addition, **the Regulatory Authority** derives its powers to license the Micro Lenders from the Micro Lending Regulations (2012).

The lending industry comprises of 324 non-bank lenders, of which, 214 are Micro Lenders, 29 Finance companies, five (5) are leasing companies and 76 Pawnshops.

Figure 38: Structure of the Non-Bank Lending Activities Industry in 2017/18



Note: * Four (4) entities are doing both Finance and leasing business

Table 18: The Licensing Status of the Lending Sector

Type of NBF	2017	New licenses/ exemptions	Withdrawals/ Dissolutions	2018	% Change
Micro Lenders	219	15	20	214	2.3
Pawnshops	72	8	4	76	5.6
Financing	19	10	0	29	52.6
Leasing	5	0	0	5	0
Grand Total	315	33	24	324	10.6

Performance of Micro Lending Businesses

The Total Revenue for the sector increased by 8.3%, from P1.2 billion in 2016 to P1.3 billion in 2017. This is as a result of an increase in Interest Income by 10%, while other income remained constant. There was no change in the Profit before tax for the sector.

Table 19 and Figure 39 below show the Income Statement of the Micro Lending sector

Licensing Status of Lending Activities

The number of licensed Micro Lenders decreased by 2.3% to 214 in 2018, from 219 the previous year. The reduction emanated from entities that ceased operations during the year under review. On the other hand, Pawnshops, Finance and Leasing companies are exempted from licensing, pending the promulgation of the industry specific legislation. The number of exempted Pawnshops increased by 5.6% from 72 in 2017 to 76 in 2018, whilst Finance companies increased by 52.6% from 19 to 29 companies. There was no change on the portfolio size of Leasing companies. Table 18 below shows the licensing status of the lending sector.

Table 19 : Abridged Statement of Comprehensive Income of Micro Lending Sector

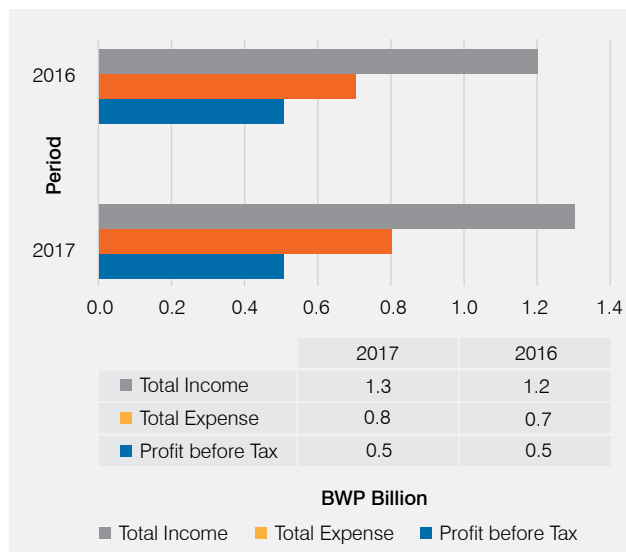
Description	Year 2017 (Billion)	Year 2016 (Billion)	% Change
Total Revenue	1.3	1.2	8.3
Total Expenses	0.8	0.7	14.3
Profit Before Tax	0.5	0.5	0%

Source: Micro Lenders Financial Statements

Note: The analysis focused on the top twenty (20) Micro Lenders who account for ninety eight percent (98%) of the industry market share.

Lending Activities (cont.)

Figure 39: Abridged Statement of Comprehensive Income for Micro Lenders



Source: NBFIRA

Total assets of the Micro Lending Sector strengthened by 10.5% from P3.8 billion in 2016 to P4.2 billion in 2017. The increase in total assets was mostly attributable to a growth in other assets and the Loan Book Value. Other assets increased by 16.7%, from P0.6 billion in 2016 to P0.7 billion in 2017 and Loan Book Value also increased by 12.5% from P3.2 billion to P3.6 billion in 2017.

Micro Lending Sector Statement of Financial Position

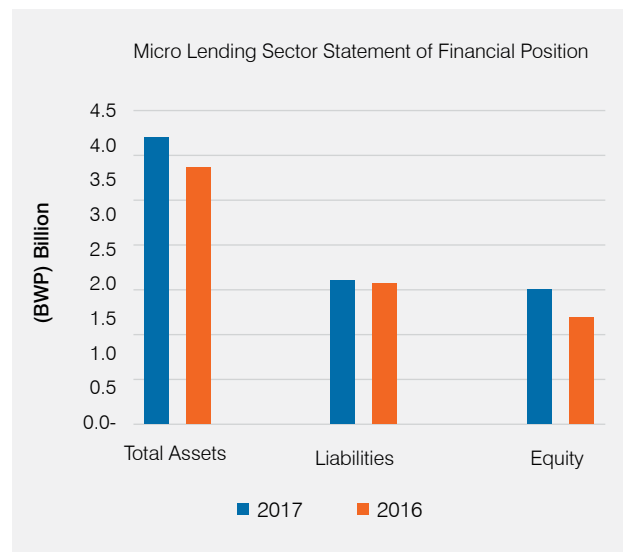
Total Equity increased by 17.6% from P1.7 billion in 2016 to P2.0 billion in 2017, and Liabilities increased by 4.8%, that is from P2.1 billion in 2016 to P2.2 billion in 2017 (see Table 20).

Table 20: Abridged Statement of Financial Position of Micro lenders

Description	Year 2017 (Billion)	Year 2016 (Billion)	% Change
Loan Book Value	3.4	3.2	12.5
Other Assets	0.7	0.6	16.7
Total Assets	4.2	3.8	10.5
Equity	2.0	1.7	17.6
Liabilities	2.2	2.1	4.8

Source: NBFIRA

Figure 40: Abridged Statement of Financial Position for the Micro Lenders



The Return on Average Assets (ROAA) decreased from 11.3% in 2016 to 9.5% in 2017, indicating that the industry assets contributed less to industry profitability compared to the previous year. Return on Equity (ROE), which measures the ability of a firm to generate profits from shareholders investments in the company, decreased to 19% in 2017, compared to 23.5 in 2016. Table 21 below shows the business performance of the micro lending sector.

Table 21:- Business Sector Performance of the Micro Lenders

Business Sector Performance	Year 2017 (Billion)	Year 2016 (Billion)	% Change
Total Assets	4.2	3.8	10.5
Total Revenue	0.7	0.6	16.7
ROA	4.2	3.8	10.5
ROE	2.0	1.7	17.6
Portfolio Value as Percentage of Total Assets	2.2	2.1	4.8

Anti-Money Laundering & Combating The Financing of Terrorism

The Regulatory Authority, having established its Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) department in the financial year 2016/2017, has continued to assert its role in deterring financial crimes during the year under review. In fulfilling this statutory mandate as defined under the Non-Bank Financial Institutions Regulatory Authority Act, 2016 (NBFIRA Act) and the Financial Intelligence Act, 2012 (FI Act), the department coordinates **the Regulatory Authority's** initiatives, to standardise preventative measures and issue guidance to the regulatory departments and the non-bank financial institutions (NBFIs).

Following on the aforementioned statutes, strategic measures were adopted in a bid to strengthen the AML/CFT regulatory framework and enforce compliance by the NBFIs. The strategic outcomes of these measures included an adequately capacitated AML/CFT function within **the Regulatory Authority**, improved AML/CFT legislation in line with international standards as well as improved NBFIs' awareness of and compliance to the same legislation, amongst others.

Monitoring and Assessing Compliance

The Regulatory Authority continues with its monitoring exercises to assess the strength of NBFIs processes, procedures and controls to protect the financial system against possible money laundering and terrorist financing activities in line with AML/CFT legislation. The monitoring includes offsite and onsite inspection of NBFIs' internal AML/CFT programmes.

Inspections

For the twelve month period under review, **the Regulatory Authority** conducted thirty (30) prudential inspections, which combined prudential issues and AML/CFT related issues.

Non-Compliance and Sanctions

Following these combined inspections, there were varied findings with some entities showing high levels of compliance, while others had weak AML/CFT preventative controls. In light of these, **the Regulatory Authority** issued recommendations, guidance and sanctions to non-compliant entities.

BUILDING AWARENESS AND PROMOTING COMPLIANCE CULTURE

Industry Workshops

The Regulatory Authority proceeded with its intent to raise awareness and promote AML/CFT compliance culture in the NBFIs sector during the year under review. A workshop was conducted for the designated AML/CFT Compliance Officers (AMLCOs) of Insurance and International Financial Services Centre (IFSC) entities – the two sectors considered to be of high risk following National Risk Assessment (NRA). The workshop was aimed at sensitising the respective sectors of the identified and potential risks relating

to the nature of their products and customers. It also deliberated on controls that entities must internalise and implement in line with AML/CFT legislation and international standards.

Guidance Notes and other Publications

The Regulatory Authority also encouraged understanding of the AML/CFT legal framework by issuing guidance notes and other related publications to the industry in general. In this case, it has issued Suspicious Transaction Report (STR) Guidance Notes to all sectors under its purview during the twelve month period. The guidance notes were issued in line with the FI Act and specifically aimed at guiding the sectors on compliance with their legal obligation of reporting suspicious transactions and matters related thereto.

Compliance to International Standards and Special Projects Mutual Evaluation Report

Botswana being a member of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), a regional body, underwent a periodic mutual evaluation during the 2015/16 financial year. Mutual Evaluation ("MEV") is a peer review exercise where member countries' AML/CFT regulatory frameworks, and their effectiveness are comprehensively assessed against FATF recommendations and potential AML/CFT risks.

The MEV Report which was released during the year under review found Botswana to be 5% largely compliant, 92.5% non-compliant, within the remaining 2.5% being marked non-applicable. These results necessitated an in-depth review of Botswana's AML/CFT regulatory framework – the legislation in particular. **The Regulatory Authority** as a designated AML/CFT supervisor and member of the National Coordinating Committee on Financial Intelligence (NCCFI) exercised its advisory role through participation and submission of recommendations in the drafting of the FI Amendment Bill with the objective of aligning it with international standards, and improve its effectiveness.

National Risk Assessment

Botswana underwent National Risk Assessment (NRA) during the 2016/17 financial year and the report was released during the year under review. The NRA, which was conducted by a select committee from member supervisors of the NCCFI, is an assessment intended to help a country to identify, assess and ultimately understand its potential money laundering/terrorist financing (ML/TF). The NRA is also a crucial part in the 40 FATF Recommendations. The findings of the NRA will assist **the Regulatory Authority** to allocate its limited resources efficiently and increase its regulatory focus on areas identified to be of high risk. **The Regulatory Authority** has also developed and disseminated a summary of the NRA report to the NBFIs with expectation that the entities will use it as a reference point to their own institutional risk assessment which should ultimately help them allocate resources accordingly and ensure full compliance.



LEGAL & ENFORCEMENT

LEGAL & ENFORCEMENT

The Regulatory Authority, through the Legal and Enforcement Department (LED), ensures strict compliance with the NBFIRA Act (2016) and all financial services laws.

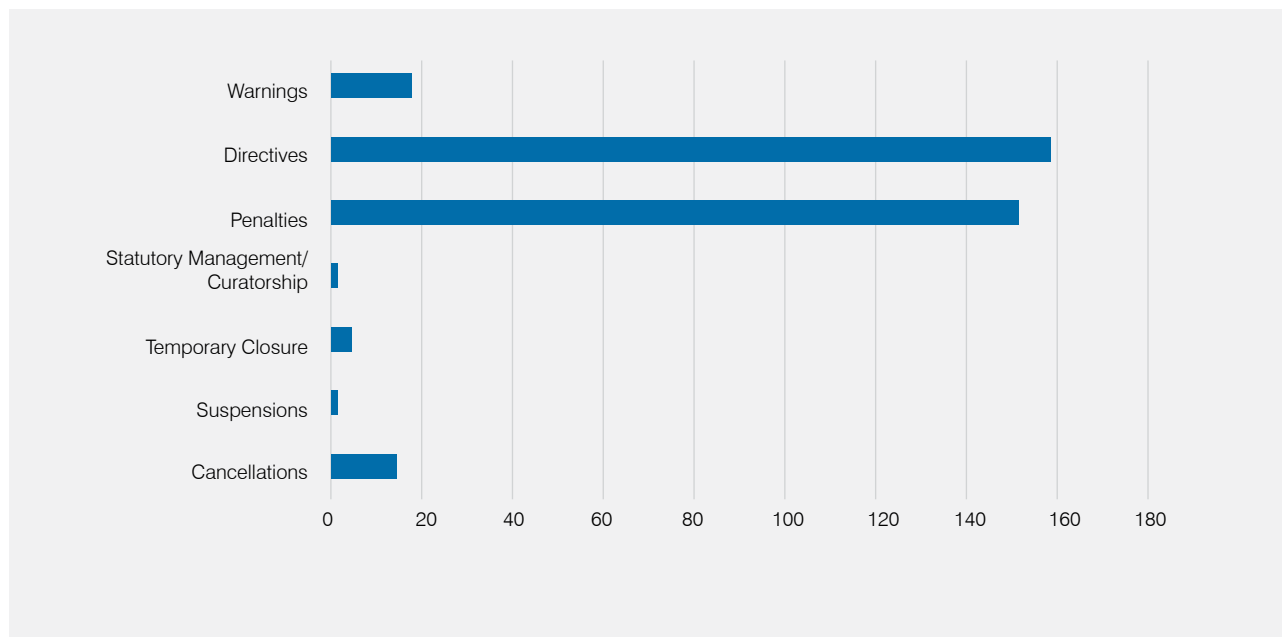
The powers bestowed on **the Regulatory Authority** mandating it to enforce financial services laws include the following:

- Issuance of directives to regulated entities
- Disqualification of a licensee from holding a licence
- Suspension of licenses
- Variation of license conditions
- Disqualification of controller of a licensee
- Imposition of administrative penalties
- Request of information and production of such records or documents by a licensee as required

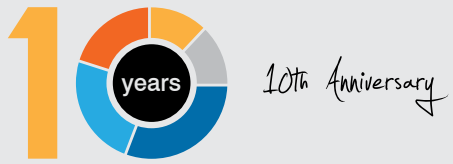
- Temporary closure and freezing of accounts of a licensee
- Carrying out on-site inspections and investigations on the business premises of a licensee
- Appointment statutory managers
- Application to Courts of Law for a winding up order

During the period under review, majority of offences were minor, with 159 directives issued and 152 penalties imposed. However, there were two (2) suspensions and statutory management/curatorship each, while cancellations and temporary closures were 15 and 5, respectively. **The Regulatory Authority**, is committed to balancing market development and compliance as evident from the issuance of 18 warnings during the review period. The table below indicates the number of enforcement actions taken during the financial year 2017/18.

Figure 41: Enforcement Actions as at March 31, 2018



Source: NBFIRA



Corporate Services

Corporate Services (cont.)

HUMAN RESOURCES & ADMINISTRATION DEPARTMENT

The Department is responsible for both the implementation of **the Regulatory Authority’s** Human Capital strategy and the provision of Administrative Services.

Our Staffing

The Regulatory Authority’s headcount increased by 10% during the period under review from eighty (80), to eighty eight (88), against an approved structure of ninety four (94). The staff compliment included one (1) expatriate staff member at executive level.

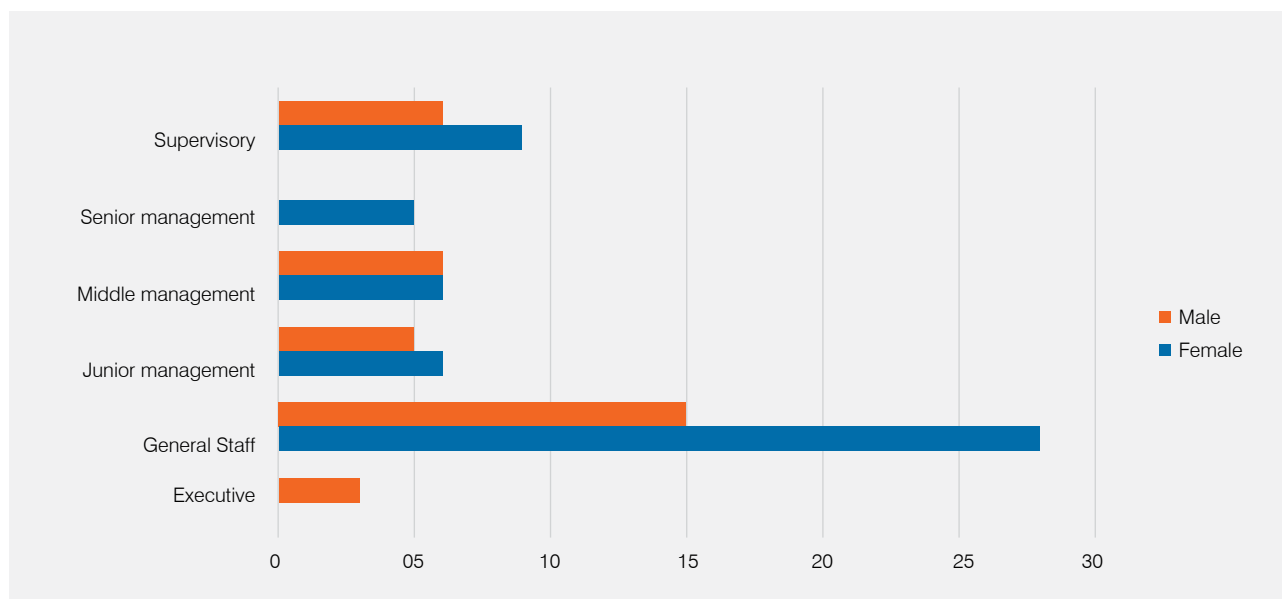
In addition, **the Regulatory Authority** engaged ten (10) graduate interns as a national contribution towards preparing graduates

for employment positions in the job market. **The Regulatory Authority** absorbed 80% as Assistant Analysts.

The Regulatory Authority’s attrition rate was 3.4% for the financial year 2017/18, which was a marginal increase from 2% reported in the previous year. The turnover rate is within the tolerance level.

The Regulatory Authority embraces non-discriminatory employment policies and procedures such that employees are not marginalised on the basis of gender or disability. Appointments in all positions is based on competence and qualification. The figure below depicts **the Regulatory Authority’s** employment profile.

Figure 42: Establishment by Position Level and Gender



Employee Engagement

In its quest to improve employee engagement and consequently inculcate a high performance culture, **the Regulatory Authority** participated in the redesigned Deloitte’s Best Company to Work for Survey which measured four dimensions. The results showed that while there are fairly good ratings in two dimensions which **the Regulatory Authority** can leverage on and manage, the other two dimensions require a great deal of improvement as reflected in the table below

Table 22: 2017 Engagement Survey Results

Description	Impact	Delight	Dissapoint	Priority
Accomplishment & Growth	0.37	68.33	11.67	Leverage
Care & Feedback	0.23	41.67	21.67	Focus
Values & Culture	0.07	85.00	1.67	Maintain
Fairness & Integrity	0.04	52.54	28.81	Manage

Corporate Services (cont.)

A five (5) – point measurement scale was used to measure the engagement level. This gave respondents two levels to rate the dimension positively, two levels to rate the dimension negatively and one mid-level for a neutral rating. Each dimension was further measured on the effect it had on individuals, referred to as the impact score. Anything over 0.1 was considered impactful or critical to employees.

Furthermore the Delight and Disappointment scores represented the percentage of respondents who selected the top two dimensions and the bottom two dimensions respectively, in the performance rating scale. These were plotted against the priority quadrant which gave an indication on items according to how critical they are and where to focus first as indicated in the priority column in Table 1 above.

The Regulatory Authority will continue to work closely with staff in the year 2018/19 to leverage on celebratory areas and manage dimensions where the ratings were below par to improve organisational attractiveness and engagement levels.

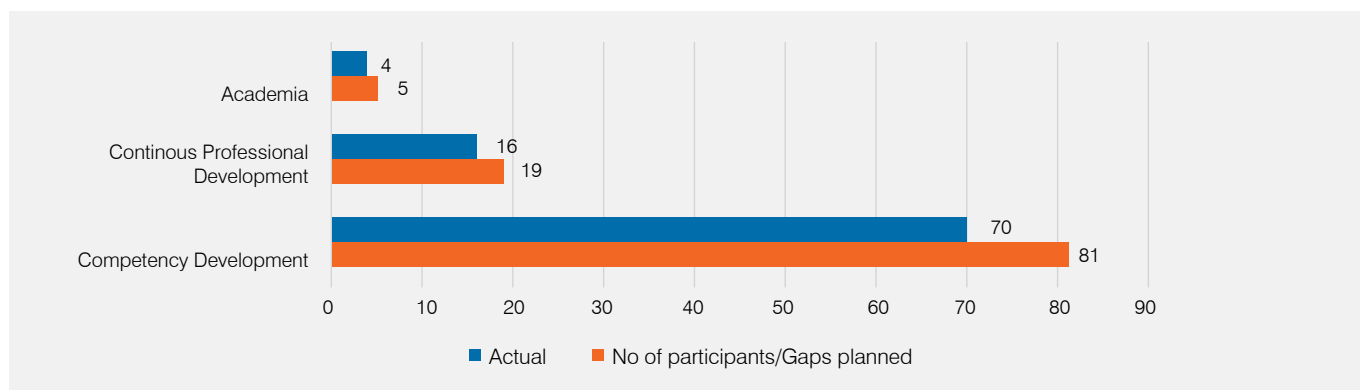
Wellness Programs

The Regulatory Authority recognizes that in order to achieve its mandate the wellness of its employees must be taken seriously. The Regulatory Authority, through the Staff Wellness Committee, organizes annual activities that impact positively on the physical and psychosocial wellbeing of employees. Employees are encouraged to participate in physical wellness activities and to that extent **the Regulatory Authority** has a gym benefit extended to all staff at no cost to individual members.

Learning and Development

In optimising **the Authority's** strategic objective of improving employee and organisational performance, the Board approved a training budget of P2.0 million for the year 2017/18 to invest in staff training with specific reference to closing core competency gaps identified through competency assessments and performance reviews. The chart below indicates the type of programs that were planned and the actual attendance during the year under review (see Figure 22).

Figure 43: Training Programs Attended – Planned and Actual



Source: NBFIRA

COMMUNICATIONS AND INTERNATIONAL AFFAIRS

The Regulatory Authority, in pursuit of promoting stakeholder engagement, continues to coordinate and facilitate the communications plans and activities as guided by the corporate communication strategy and objectives of **the Regulatory Authority**. This is achieved by the available multi-functional support services; being communications guidance, branding and execution of the Authority's consumer education strategy. The stakeholder engagement strategy, thereby, enhances consumer awareness,

protection and satisfaction, aimed at promoting the nation's financial stability. Through regulatory public notices, the public is made aware of regulated entities' statuses and developments.

The Regulatory Authority broadened its outreach spectrum by increasing participation in interactive events, such as, trade fairs, workshop presentations, international activities, benchmarking activities, informative adverts, and dissemination of financial services

Corporate Services (cont.)

information in the 2017/18 financial year. This saw growth in the number of activities increasing by 10.3%, from 57 in 2016/17 to 70 activities reported in 2017/18. The activities' objectives centered around educating the general public and users on financial products and services, thus enabling them to make informed decisions.

Table 23: Activities of the Regulatory Authority's campaigns and publications 2017/18

Events	Number of Activities		
	2017/18	2016/17	% Change
Stakeholder events	15	7	6.3
Local councils	3	5	-1.6
Trade Fairs	4	4	0
Tertiary institutions / Schools	7	5	1.6
Public notices	25	23	1.6
Financial services	14	11	2.4
Stakeholder survey	1	1	0
International Affairs activities	1	1	0
Total	70	57	10.3

Source: NBFIRA

The Regulatory Authority's financial consumer education initiatives serve to ensure;

- **Financial Inclusion**, where *the Regulatory Authority* is reaching out to all Batswana, educating them on money matters such as the importance of budgeting and saving. This is shared through the NBFIRA 'I plan for my Money' website link accessible to future generations as financial consumers and investors. To achieve this, *the Regulatory Authority* undertakes public and school financial education, road shows, mall activations and engagement with various local authorities in the country. The financial inclusion initiative also provides requirements towards licensing Batswana and encouraging ownership of financial institutions businesses.
- **Promotion of consumer confidence**, which empowers and develops a culture of consumer responsibility;
- **Improvement of consumer awareness** and promotion of informed consumer choice and behaviour. This will be achieved by provision and transfer of information to the consumers, which will improve their knowledge and skills, resulting in consumer's protection from fraudulent practices and exploitative market operations. The approach recognizes

the importance of the unequal power relations between consumers and service providers and the importance of regulation;

- **Responsiveness:** responding to all stakeholder inquiries and also providing access to information, tools and ongoing support systems relating to financial products and services.
- **Stakeholder Engagement:** promoting the importance of financial literacy, in the belief that even small enhancements to literacy levels make a real difference if done regularly. *The Regulatory Authority* engages in regional consumer fairs and exhibitions, informing and educating the public about the Authority's mandate and their rights and responsibilities in the financial sector. It also broadens its footprint and ensure that consumer education messages reach the length and breadth of the country through discussions and interviews

Information Dissemination Platform

Website and social media campaigns

The Regulatory Authority continues to utilize the website and Facebook page to convey information about its mandate and receive information regarding its services offerings. These communication channels are also used to publish statutory public notices, financial services information, UNSC sanctions list, regulated entities, public chat services and events. In addition, the website is used to publish statutory public notices and events. The website traffic continues to show positive growth with increased visitations. Table 21 below demonstrates a significant growth of 190%, where total usage was at 10,687 in 2016/17, as compared to 31,036 in 2017/18 users of *the Regulatory Authority's* website page.

Table 24: Website Usage

Year	New Users	Returning Users	Total Users
2016/2017	17,529	4,952	10,687
2017/2018	25,439	5,597	31,036
%change	45	13	190

Source: NBFIRA

Publications

The Regulatory Authority strengthens its visibility by providing publications, which includes, inter alia, corporate brochures, press notices, communiqués, annual report, bi-annual newsletters and updates about its mandate.

Corporate Services (cont.)

INTERNATIONAL AFFAIRS

International and Regional Collaborations

The Regulatory Authority, being a member of international standard setting bodies, regularly engages with a wide range of international stakeholders, through bilateral and multilateral forums.

The Regulatory Authority recognises the risk associated with the regulation of entities that are part of international conglomerates. To mitigate this risk, **the Regulatory Authority** actively engages

in, and fosters information sharing on a multilateral, bilateral, and ad hoc basis. Multilateral sharing mechanisms are encompassed under the MMOU in place between member countries of international organisations. Additionally, bilateral MoUs detail the scope and terms of information-sharing between regulators and provide a framework for consistent cooperation

Table 25: Memoranda of Understanding as at March 31, 2018

Local	SADC Regional	International
Statistics Botswana (March 15, 2017)	Committee for Insurance, Securities & Non-Banking Authorities (September 18, 2009)	Retirement Benefits Authority, Kenya (28th May 2018)
Botswana Investment and Trade Centre (February 25, 2017)	Commissao do Mercado de Capitais (CMC), Angola (April 10, 2014)	Securities & Exchange Board of India (May 22, 2014)
Financial Intelligence Agency (October 5, 2015)	Financial Services Board ,South Africa (September 18, 2009)	
Botswana Accounting Oversight Authority (April 1, 2014)	The Office of the Registrar of Insurance & Retirement Funds ,Swaziland (April 25, 2013)	
Botswana Unified Revenue Services (March 31, 2014)	Financial Services Commission, Mauritius (April 19, 2012)	
Bank of Botswana (March 14, 2014)		
Competition Authority Botswana (September 2013)		

Membership of International Standard Setting Bodies

The Regulatory Authority needs international partnerships to assist in achieving **the Regulatory Authority's** mandate through benchmarking of legislation and processes that are of international best practice.

The risks of not adhering to the local and international standards would be, consumers prejudiced by unscrupulous financial service providers, not keeping abreast of regulatory developments, weak

regulatory reforms, lack of cross-border cooperation and assistance, non-compliance with international standards and reputational risks.

The Regulatory Authority engages the international bodies through consultative documents such as surveys, conferences and attending meetings of international standard-setting bodies.

The Regulatory Authority participates in the activities of the following international and regional bodies:

Corporate Services (cont.)

Table 26: Participation in International Organisations as at March 31, 2018

Standard setting Bodies	Purpose and Participation
<p>ESAAMLG</p>	<p>Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), is a regional organisation founded to combat money laundering through implementation of anti-money laundering strategies on member countries.</p> <p>The strategies of ESAAMLG include implementation of the Financial Action Task Force (FATF) recommendations with particular focus on the Eastern and Southern Africa regions</p>
<p>IAIS</p>	<p>International Association of Insurance Supervisors (IAIS), established in 1994, with a mission to promote effective and globally consistent supervision of the insurance industry in order to develop and maintain fair, safe and stable insurance markets for the benefit and protection of policyholders and to contribute to global financial stability.</p> <p>The International Association of Insurance Supervisors (IAIS) Annual Conference mission is “to promote effective and globally consistent supervision of the insurance industry in order to develop and maintain fair, safe and stable insurance markets for the benefit and protection of policyholders, thereby contributing to the global financial stability”. The Regulatory Authority attended the 2017 annual conference themed “Insurance Supervision: Looking Beyond”.</p>
<p>IOSCO</p>	<p>International Organisation of Securities Commissions (IOSCO), is the leading international policy forum for securities regulators and is recognised as the global standard-setting body for securities. The Authority has in this regard obtained a confirmed assurance from IOSCO to provide technical assistance to progress application for Ordinary membership in 2018/19.</p> <p>The Regulatory Authority has been a member since August 2015 as an associate member and it is priority for the Regulatory Authority to attain a full Ordinary membership with IOSCO. This will be achieved by addressing some priority needs of the Regulatory Authority, in line with the IOSCO strategic direction of 2015-2020. Through this membership the Regulatory Authority also became a member of the African Middle East Regional Committee (AMERC), a subcommittee of IOSCO that is focused on issues of securities in the emerging and growing markets.</p> <p>During the 2017/2018 financial year, the Regulatory Authority showed commitment and participation in IOSCO events and participated where possible.</p> <p>In May 2017, the Regulatory Authority attended the 42nd IOSCO Annual Conference which focused on the challenges of strengthening market resilience, addressing financial misconduct and financing the real economy through capital markets and the role of international standards in securities markets and how regulators can support market development</p> <p>In September 2017, the Authority attended the 10th IOSCO AMCC Training Seminar with the main focus being; Market surveillance, enforcement and investigation, cyber resilience, SME financing, RegTech and Corporate governance.</p> <p>In December 2017, the Authority attended IMF-IOSCO training and workshop. Training was in relation to regulation and supervision of exchanges and self-regulatory organizations while the workshop was in relation to the IOSCO MMoU application.</p>
<p>IOPS</p>	<p>International Organisation of Pension Supervisors (IOPS), is an independent international body representing those involved in the supervision of private pension arrangements. Formed in July 2004, the major objective of IOPS is to improve the quality and effectiveness of the supervision of private pension systems throughout the world.</p>

Corporate Services (cont.)

Table 26: Participation in International Organisations as at March 31, 2018 (continued)

Standard setting Bodies	Purpose and Participation
CISNA	<p>Committee of Insurance, Securities and Non-banking Financial Authorities (CISNA), is made up of non-banking financial institutions authorities from the SADC region and reports to the SADC Committee of Ministers of Finance. Its aim is to promote and maintain financial stability and growth in the SADC region through a process of co-operation, exchange of information and engagement between regional regulators.</p> <p>The Regulatory Authority participated in the two meeting of 2017, one being in Swaziland and the other in Zimbabwe.</p>

Global Financial Partnership Centre (GLOPAC)

The Financial Services Agency of Japan (FSA) established GLOPAC as a successor organization of the Asian Financial Partnership Centre (AFPAC). The objectives of the GLOPAC program are to address issues related to the global financial markets, effectively conduct financial sector technical assistance for infrastructure development and further strengthen cooperative relationships with financial authorities around the world.

To pursue its objectives, GLOPAC offers a fellowship program and invites financial regulators and supervisors around the world as "Visiting Fellows" to participate in the diverse programs provided by the program. **The Regulatory Authority** participated in the fellowship programme since 2016. To date, three staff members have attended the programme.

Complaints Status

The Regulatory Authority continued to receive complaints from the public against regulated entities. As at March 31st, 2018, 177 complaints were received being a decline of 8.3% from 193 complaints received. The decline can be attributed to consumer's awareness of complaints procedures and improvement of conduct by regulated entities.

Table 27 Number of Complaints Received as at March 31.

Nature of Complaints	2018	2017	% Change
Lending Activities	77	84	(8.3)
Insurance Department	46	51	(9.8)
Capital Markets	7	2	250
Retirement Funds Department	47	56	(16.1)
Total	177	193	(8.3)

INFORMATION TECHNOLOGY

The Regulatory Authority's is reliant on Information Technology (IT) services for all its operations. The network and server infrastructure only experienced minimal disruptions in the past year. The key systems such as the mailing system, Enterprise Resource Planning (ERP) and Risk Based Supervision System (RBSS) were at 99% availability for the entire year, which is within acceptable limits.

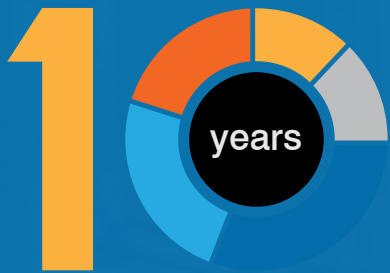
Enterprise Resource Planning (ERP)

The Regulatory Authority went live with all the ERP modules in August of 2016. In its second year the system has progressively stabilised. The users are getting more comfortable and fewer incidents have been recorded in the current financial year. All the self-services processes are now done online and none carried out manually and as a result **the Regulatory Authority** is starting to realise the benefit of its investment. One of the highlights for this year was the enhancement of the finance module, to allow for easier financial reporting.

Risk Based Supervision System

The Regulatory Authority continues to make system more user friendly and more intuitive. This year, **the Regulatory Authority** has streamlined some processes to shorten the time taken to complete the processes and its effect is still under observation.

The system currently does not have modules for medical aid funds, pawnshops, finance and leasing companies, amongst others, due to ongoing legislative developments. Once the legislation are in place, the system will be expanded to include additional data parameters, which are currently not being collected.



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Annual Financial Statements

for the year ended 31 March 2018





“Continuing to do more; A decade of financial stability”

General Information for the year ended 31 March 2018

Country of domicile	Botswana
Nature of operations and principal activities	Safeguard the fairness, stability and efficiency of the non-bank financial sector.
Directors	Mrs. L.T. Tema (Acting Chairperson) Mrs. A.T. Khunwana Mrs. P. Masalela (appointed 01 September 2017) Dr. L. Senatla (appointed 01 September 2017) Mr. K. Olebile (appointed 01 October 2017) Ms. I.M. Ramalohanye (appointed 01 October 2017) Ms. M.V. Kabomo (appointed 01 November 2017) Mrs. M. Dube (Chairperson, retired 30 September 2017) Dr. T.T.K. Matome (retired 13 November 2017) Mr. S.M. Sekwakwa (retired 31 August 2017)
Chief Executive Officer	Mr. O.M. Ramasedi
Registered office	3rd Floor Exponential Building Plot 54351 Central Business District Off P G Matante Gaborone Botswana
Business address	Plot 54351 Central Business District Off PG Matante Gaborone Botswana
Bankers	Stanbic Bank of Botswana Limited
Auditors	Grant Thornton Chartered Accountants Plot 50370, Acumen Park Fairgrounds Office Park Gaborone Botswana
Functional currency	Botswana Pula (BWP)



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The following supplementary information does not form part of the annual financial statements and is unaudited:

- 100** Detailed Income Statement



Board Responsibilities and Approval of the Annual Financial Statements

The directors are required in terms of the Non-Bank Financial Institutions Regulatory Authority Act, 2016 to maintain adequate accounting records and are responsible for the content and integrity of the annual financial statements and related financial information included in this report. It is their responsibility to ensure that the annual financial statements fairly present the state of affairs of the authority as at the end of the financial year and the results of its operations and cash flows for the period then ended, in conformity with International Financial Reporting Standards. The external auditors are engaged to express an independent opinion on the annual financial statements.

The annual financial statements are prepared in accordance with International Financial Reporting Standards and are based upon appropriate accounting policies consistently applied and supported by reasonable and prudent judgements and estimates.

The directors acknowledge that they are ultimately responsible for the system of internal financial control established by **the Regulatory Authority** and place considerable importance on maintaining a strong control environment. To enable the directors to meet these responsibilities, the board of directors sets standards for internal control aimed at reducing the risk of error or loss in a cost effective manner. The standards include the proper delegation of responsibilities within a clearly defined framework, effective accounting procedures and adequate segregation of duties to ensure an acceptable level of risk. These controls are monitored throughout **the Regulatory Authority** and all employees are required to maintain the highest ethical standards in ensuring **the Regulatory Authority's** business is conducted in a manner that in all reasonable circumstances is above reproach. The focus of risk management in **the Regulatory Authority** is on identifying, assessing, managing and monitoring all known forms of risk across **the Regulatory Authority**. While operating risk cannot be fully eliminated, **the Regulatory Authority** endeavours to minimise it by ensuring that appropriate infrastructure, controls, systems and ethical behaviour are applied and managed within predetermined procedures and constraints.

The directors are of the opinion, based on the information and explanations given by management, that the system of internal control provides reasonable assurance that the financial records may be relied on for the preparation of the annual financial statements. However, any system of internal financial control can provide only reasonable, and not absolute, assurance against material misstatement or loss.

The directors have reviewed **the Regulatory Authority's** cash flow forecast for the year to 31 March 2019 and, in light of this review and the current financial position, they are satisfied that **the Regulatory Authority** has or had access to adequate resources to continue in operational existence for the foreseeable future.

The external auditors are responsible for independently auditing and reporting on **the Regulatory Authority's** annual financial statements. The annual financial statements have been examined by **the Regulatory Authority's** external auditors and their report is presented on page s 71 to 73.

The annual financial statements set out on pages 74 to 99, which have been prepared on the going concern basis, were approved by the board of directors on and were signed on their behalf by:

Approval of financial statements

Chairperson Finance and Audit Committee

Acting Board Chairperson

23 August 2018

Gaborone

Independent Auditor's Report



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TO THE MEMBERS OF NON-BANK FINANCIAL INSTITUTIONS REGULATORY AUTHORITY

Opinion

We have audited the accompanying annual financial statements of Non-Bank Financial Institutions Regulatory Authority set out on pages 74 to 99, which comprise the statement of financial position as at 31 March 2018, and the statement of profit or loss and other comprehensive income, statement of changes in funds and statement of cash flows for the year then ended, and notes to the annual financial statements, including a summary of significant accounting policies.

In our opinion, the annual financial statements give a true and fair view of, the financial position of Non-Bank Financial Institutions Regulatory Authority as at 31 March 2018, and its financial performance and cash flows for the year then ended in accordance with International Financial Reporting Standards and in the manner required by the Non-Bank Financial Institutions Regulatory Authority Act, 2016.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the audit of the annual financial statements section of our report. We are independent of **the Regulatory Authority** in accordance with the International Ethics Standards Board for Accountants Code of Ethics for Professional Accountants (Parts A and B) (IESBA Code) and other independence requirements applicable to performing audits of annual financial statements in Botswana. We have fulfilled our other ethical responsibilities in accordance with the IESBA Code and in accordance with other ethical requirements applicable to performing audits in Botswana. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the annual financial statements of the current period. These matters were addressed in the context of our audit of the annual financial statements as a whole, and in forming our opinion thereon, and the report below is not intended to constitute separate opinions on those key audit matters.

Key audit matter	How the matter was addressed in our audit
<p>Recognition of revenue</p> <p><i>The Regulatory Authority</i> relies on Supervisory levies and Government grants to sustain its activities. The activities include those that are recurrent in nature for administrative purpose and for the remuneration of its employees.</p> <p>The recognition of Supervisory levies is done in accordance with the principles outlined in IAS 18: Revenue.</p>	<ul style="list-style-type: none">• We have performed walkthroughs on the revenue cycle to gain an understanding of when the revenue is recognised.• We obtained the invoice listing from the operating system and determined that income has been appropriately recorded in the general ledger. We selected a sample of invoices raised from each category to verify that the levy has been appropriately recognised in the system and compare the details of the invoice to the information in <i>the Regulatory Authority's</i> system.

Independent Auditor’s Report (cont.)

Key audit matter	How the matter was addressed in our audit
	<ul style="list-style-type: none"> We have reviewed <i>the Regulatory Authority’s</i> credit policy on receivables and assessed that appropriate provision is made on overdue accounts where the recoverability of the balances was doubtful.
<p>Valuation of the intangible asset</p> <p><i>The Regulatory Authority</i> has invested significant amount in the development and implementation of its systems namely the Risk Based Supervisory System (RBSS) and Enterprise Resource Planning (ERP). The total amount of intangible assets of <i>the Regulatory Authority</i> is stated at P 13 964 776 as at the year-end.</p>	<ul style="list-style-type: none"> We have also verified the workings and computations of the management to determine the amortization of the intangible assets recognized in the books. We have evaluated the assumptions used by the management to assess the useful lives of the intangible asset and satisfied with the assumption used and observed that the management are consistent with <i>the Regulatory Authority</i> accounting policies.
<p>Occurrence of expenses</p> <p>The operations of <i>the Regulatory Authority</i> are supported by significant expenditure. As at 31 March 2018, the total administrative and payroll expenditure incurred was P 76 878 573.</p>	<ul style="list-style-type: none"> Our audit procedures included obtaining an understanding of the nature of the expenditure. On an account to account basis, we performed analytical procedures comparing incurred expenditures to expectation and obtained sufficient explanation and evidence for significant variances. We obtained the schedule of expenditure for the period and using monetary unit sampling technique, we selected a sample for testing for compliance. We obtained the schedule of payables related to the operations of <i>the Regulatory Authority</i> and have verified the balances to supporting documents or details to satisfy ourselves on the balances due to them.

Responsibilities of the directors for the Annual Financial Statements

The directors are responsible for the preparation and fair presentation of the annual financial statements in accordance with International Financial Reporting Standards, and for such internal control as the directors determine is necessary to enable the preparation of annual financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the annual financial Statements, the directors are responsible for assessing *the Regulatory Authority’s* ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate *the Regulatory Authority* or to cease operations, or have no realistic alternative but to do so.

Those charged with governance are responsible for overseeing *the Regulatory Authority’s* financial reporting process.

Auditor’s responsibilities for the audit of the Annual Financial Statements

Our objectives are to obtain reasonable assurance about whether the annual financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor’s report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these annual financial statements.

Independent Auditor's Report (cont.)

As part of an audit in accordance with International Standards on Auditing, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the annual financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of **the Regulatory Authority's** internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the directors.
- Conclude on the appropriateness of the directors' use of the going concern basis of accounting and based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on **the Regulatory Authority's** ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the annual financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause **the Regulatory Authority** to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the annual financial statements, including the disclosures, and whether the annual financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with the directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

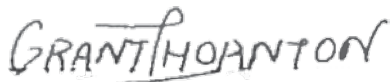
We also provide the directors with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the directors, we determine those matters that were of most significance in the audit of the annual financial statements of the current year and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Reporting on Other Legal and Regulatory Requirements

As required by the Non-Bank Financial Institutions Regulatory Authority Act, 2016. we report to you , based on our audit, that:

- All the information and explanation which, to the best of the auditor's knowledge and belief, were necessary for the performance of the auditor's duties;
- The accounts and related records of **the Regulatory Authority** have been properly kept
- **The Regulatory Authority** has complied with all the financial provisions of this Act with which it is its duty to comply with: and
- The statement of accounts prepared by **the Regulatory Authority** was prepared on a basis consistent with that of the preceding year and represents a true and fair view of the transactions and financial affairs of **the Regulatory Authority**.



Chartered Accountants
Certified Auditor: Mr. Aswin Vaidyanathan (Memb No:19980110)
Certified Auditor of Public Interest Entity
Certificate Number: CAP 0016 2018

23 August 2018

Gaborone



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Statement of Profit or Loss and Other Comprehensive Income for the year ended 31 March 2018

Figures (BWP)	Note	2018	2017
Government grants	3	16 360 914	15 934 537
Amortisation of Government grants	4	6 498 304	7 533 512
Other operating income	5	2 264 305	2 415 198
Supervisory levies	6	45 039 485	39 192 611
Total revenue		70 163 008	65 075 858
Staff costs	7	(46 421 316)	(38 959 883)
Consultancy costs	8	(2 190 072)	(2 228 290)
Administrative expenses	9	(16 068 681)	(16 374 052)
Other operating expenses	10	(12 198 504)	(8 203 472)
Total operating expenses		(76 878 573)	(65 765 697)
Operating deficit		(6 715 565)	(689 839)
Finance income	11	175 395	369 597
Deficit before taxation		(6 540 170)	(320 242)
Taxation	20	-	-
Total operating deficit		(6 540 170)	(320 242)

Statement of Financial Position as 31 March 2018

Figures in (BWP)	Note	2018	2017
Assets			
Non-Current Assets			
Property, plant and equipment	12	4 528 568	5 250 036
Intangible assets	13	13 964 776	19 383 934
		18 493 344	24 633 970
Current Assets			
Trade and other receivables	14	631 727	1 514 913
Cash and cash equivalents	15	11 617 945	16 231 143
		12 249 672	17 746 056
Total Assets		30 743 016	42 380 026
Equity and Liabilities			
Funds			
Statutory reserves		3 390 792	5 765 793
Accumulated loss		(2 500 240)	1 664 929
		890 552	7 430 722
Liabilities			
Non-Current Liabilities			
Government grants	16	19 755 669	24 274 269
African Development Bank grant	17	3 320 867	4 853 575
		23 076 536	29 127 844
Current Liabilities			
Trade and other payables	18	3 458 795	3 046 911
Short term employee benefits	19	3 303 154	2 327 745
Operating lease liability	22	13 979	446 804
		6 775 928	5 821 460
Total Liabilities		29 852 464	34 949 304
Total Funds and liabilities		30 743 016	42 380 026



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Statement of Changes in Equity for the year ended 31 March 2018

Figures (BWP)	Statutory Reserve	Accumulated Funds	Total Funds
Balance at 01 April 2016	5 765 793	1 985 171	7 750 964
Deficit for the year	-	(320 242)	(320 242)
Balance at 01 April 2017	5 765 793	1 664 929	7 430 722
Deficit for the year	-	(6 540 170)	(6 540 170)
Transfer between reserves	(2 375 001)	2 375 001	-
Total contributions by and distributions to owners of company recognised directly in equity	(2 375 001)	2 375 001	-
Balance at 31 March 2018	3 390 792	(2 500 240)	890 552

Statutory Reserve

Section 23 (2) of the Non-Bank Financial Institutions Regulatory Act, 2016, requires that an annual estimate not exceeding 10 per cent (10%) of the total expenditure provided for in the estimates, be provided for as a reserve. The Statutory Reserve provided is adequate for the level of expenditure incurred. The purpose of the reserve is to be utilised for unforeseen regulatory expenditure. During the current year, **the Regulatory Authority** transferred an amount of P 2 375 001 from its statutory reserve to the accumulated funds account for the purpose of regulatory expenses.

The Regulatory Authority believes that based on the current budget, the statutory reserve is adequate and in compliance with section 23(2) of the Non-Bank Financial Institutions Regulatory Act, 2016.

Statement of Cash Flows for the year ended 31 March 2018

Figures in (BWP)	Note	2018	2017
Cash flows from operating activities			
Cash utilised in operations	21	(7 081 073)	(11 000 009)
Cash flows from investing activities			
Purchase of property, plant and equipment	12	(446 995)	(873 373)
Sale of property, plant and equipment		-	32 070
Sale of investment property		108 451	214 878
Disposal of leasehold property		236 333	-
Sale of other intangible assets	13	1 919 521	2 173 320
Development costs incurred		-	(2 102 890)
Interest Income		175 395	369 597
Net cash from investing activities		1 992 705	(186 398)
Cash flows from financing activities			
Government grants		475 170	868 303
Total cash and cash equivalents movement for the year		(4 613 198)	(10 318 104)
Cash and cash equivalents at the beginning of the year	15	16 231 143	26 549 247
Total cash and cash equivalents at end of the year		11 617 945	16 231 143



Accounting Policies for the year ended 31 March 2018

1. SIGNIFICANT ACCOUNTING POLICIES

The annual financial statements have been prepared in accordance with International Financial Reporting Standards. The annual financial statements have been prepared on the historical cost basis, except for certain financial instruments measured at fair value, and incorporate the principal accounting policies set out below. They are presented in Pula.

These accounting policies are consistent with the previous period.

1.1 Significant accounting judgements and estimates

The preparation of financial statements in conformity with the International Financial Reporting Standards requires the use of certain critical accounting estimates and judgements concerning the future. Estimates and judgements are continually evaluated and are based on historical factors coupled with expectations about future events that are considered reasonable. In the process of applying *the Regulatory Authority's* accounting policies, management has made the following estimates that have a significant risk of causing material adjustment to the carrying amounts of assets and liabilities within the next year.

Key Areas of estimation and judgement

The key assumption concerning the future and other key sources of estimation uncertainty and judgements at the reporting date, that have a significant risk of causing material adjustment to the carrying amounts of assets and liabilities within the next financial year as this involves assessments or decisions that are particularly complex or subjective, are discussed below:

Depreciation charges and residual values

For depreciation purposes, a significant component is defined as equal to or greater than 20% of total cost of the asset and each significant component with different useful lives is depreciated separately. The depreciation methods reflects the pattern in which economic benefits attributable to the assets flow to the entity. The useful lives of these assets can vary depending on a variety of factors, including but not limited to the technological obsolescence, maintenance programs, refurbishments, product life cycles and the intention of management. Residual values of assets are determined by estimating the amount that the entity would currently obtain from the disposal of the asset already of age and in the condition expected at the end of its useful life. The estimation of the useful life and residual values of an asset is a matter of judgement based on the past experience of *the Regulatory Authority* with similar assets and the intention of management. Assessment of the asset condition and usefulness are key assumptions used to determine the assets' useful lives and residential values.

Supervisory Levies

Where supervisory levies are calculated on information that has not been audited, *the Regulatory Authority* assumes that estimates have been used and will place reliance on the information submitted by the regulated entities as a basis for calculation.

Impairment testing

The recoverable amounts of cash-generating units and individual assets have been determined based on the higher of value-in-use calculations and fair values less costs to sell. These calculations require the use of estimates and assumptions. It is reasonably possible that the assumption may change which may then impact our estimations and may then require a material adjustment to the carrying value of assets.

The entity reviews and tests the carrying value of assets when events or changes in circumstances suggest that the carrying amount may not be recoverable. Assets are grouped at the lowest level for which identifiable cash flows are largely independent of cash flows of other assets and liabilities. If there are indications that impairment may have occurred, estimates are prepared of expected future cash flows for each group of assets. Expected future cash flows used to determine the value in use of assets are inherently uncertain and could materially change over time. They are significantly affected by a number of factors including supply and demand, together with economic factors such as exchange rates, inflation and interest.

Accounting Policies (cont.) for the year ended 31 March 2018

Provisions

Provisions were raised and management determined an estimate based on the information available.

1.2 Statement of Compliance

The financial statements have been prepared in accordance with the International Financial Reporting Standards (IFRS) and the Non-Bank Financial Institutions Regulatory Authority Act, Chapter 46:08.

1.3 Intangible assets

An intangible asset is recognised when:

- it is probable that future economic benefits associated with the asset will flow to the entity; and
- the cost of the asset can be measured reliably.

Intangible assets are initially measured at costs.

An intangible asset arising from development (or from the development phase of an internal project) is recognised when:

- it is technically feasible to complete the asset so that it will be available for use or sale.
- there is an intention to complete and use or sell it.
- there is an ability to use or sell it.
- it will generate probable future economic benefits
- there are available technical, financial and other resources to complete the development and to use or sell the asset.
- the expenditure attributable to the asset during its development can be measured reliably.

The amortisation period and the amortisation method for intangible assets are reviewed every period-end.

Amortisation is provided to write down the intangible assets, on a straight line basis, to their residual values as follows:

Item	Useful life
Risk Based Supervisory System (RBSS)	5 years
Enterprise Resource Planning (ERP)	5 years

1.4 Property, plant and equipment

Property, Plant and Equipment is stated at cost, net of accumulated depreciation and / or accumulated impairment losses, if any. All plant and equipment are measured at historical cost less depreciation and impairment losses. Historical costs includes expenditure that is directly attributable to the acquisition of the items.

Subsequent costs such as replacement parts and major inspections are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to **the Regulatory Authority** and the cost of the item can be measured reliably. All day-to-day repairs and maintenance are charged to the surplus or deficit during the financial period in which they are incurred.

Depreciation is charged so as to write off the cost of the assets over their estimated useful lives on a straight-line basis, to estimated residual values. Where significant parts of an item have different useful lives to the item itself, these parts are depreciated separately over their useful lives. The methods of depreciation, useful lives and residual values are reviewed annually, with the effect of any change in estimates accounted for prospectively.

Accounting Policies (cont.) for the year ended 31 March 2018

The following methods and rates were used during the period to depreciate plant and equipment to estimated residual values:

Item	Depreciation method	Average useful life
Leasehold property	Lease term	Lease term
Furniture and fixtures	Straight line	10 years
Motor vehicles	Straight line	5 years
Office equipment	Straight line	6- 7 years
Computer equipment	Straight line	3 - 7 years

An item of property, plant and equipment is derecognised upon disposal or when no future economic benefits are expected from its continued use or disposal. Any gain or loss arising from the derecognition of an item of property, plant and equipment, determined as the difference between the net disposal proceeds, if any, and the carrying amount of the item, is included in profit or loss when the item is derecognised.

1.5 Impairment of non-financial assets

At each financial reporting date, **the Regulatory Authority** reviews the carrying amount of its tangible assets to determine whether there is any indication that those assets have suffered an impairment loss. If any such indications exist, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any). Where it is not possible to estimate the recoverable amount of an individual asset, **the Regulatory Authority** estimates the recoverable amount of the cash generating section to which the asset belongs.

Recoverable amount is the higher of fair value less costs to sell and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

If the recoverable amount of an asset (or cash-generating section) is estimated to be less than its carrying amount, its carrying amount is reduced to its recoverable amount. Impairment losses are recognised in the surplus or deficit in those categories consistent with the function of the impaired asset.

Where an impairment loss subsequently reverses, the carrying amount of the asset (cash-generating-section) is increased to the revised estimate of its recoverable amount. This is done so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognised in the prior years. A reversal of an impairment loss is recognised in the surplus or deficit.

1.6 Revenue

Revenue is recognised to the extent that it is probable that the economic benefits will flow to **the Regulatory Authority** and the revenue can be reliably measured. Revenue is measured at the fair value of the consideration received, excluding discounts and rebates. **The Regulatory Authority** assesses its revenue arrangements against specific criteria in order to determine if it is acting as principal or agent. **The Regulatory Authority** has concluded that it is acting as a principal in all of its revenue arrangements. The following specific revenue recognition criteria must also be met before revenue is recognised:

The supervisory levies

The supervisory levies and licence fees were promulgated into law through Statutory Instrument No.34 of 2016 of the Republic of Botswana, which was published in the Government Gazette of the 18 March 2016. Supervisory levies are charged and are payable in two equal portions, on or before the 30th April and 31st October of each financial year. Registered non-bank financial institutions are required to pay levies on an annual basis in terms of the Non-Bank Financial Institutions Regulatory Authority Act 2016. Supervisory levies are recognised on an accrual basis. **The Regulatory Authority** may, on application, waive payment of some or all of a supervisory levy, penalty levy or a fee.

Accounting Policies (cont.) for the year ended 31 March 2018

License fees

License fees are recognised on licensing of the relevant supervised entities. Some classes of regulated entities are charged annual licence fees, such fees are recognised by *the Regulatory Authority* as revenue.

Penalties

Penalties are recognised in the surplus or deficit on penalizing those regulated entities that have defaulted in meeting the necessary regulatory guidelines.

Finance income

Revenue is recognised as interest accrues (using the effective interest method). Finance income is recognised in the surplus or deficit.

Government Grant

Government grants are recognised where there is reasonable assurance that the grant will be received and all attached conditions will be complied with. When the grant relates to an expense item, it is recognised as income over the period necessary to match the grant on a systematic basis to the costs that it is intended to compensate. Where the grant relates to the purchase of an asset, it is recognised as capital grant in the statement of financial position and released to the statement of comprehensive income in equal amounts over the expected useful life of the related asset. Where *the Regulatory Authority* receives a non-monetary grant, the asset and the grant are recorded at nominal amounts and released to the total surplus or deficit over the expected useful life of the relevant asset by equal annual installments.

1.7 Foreign currency translation

Transactions in foreign currencies are initially recorded at the functional currency rate ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are retranslated at the functional currency rate of exchange ruling at the reporting date.

Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions. Foreign exchange translation gains or losses arising on the settlement of monetary items or on translating monetary items or on translating monetary items at rates different from those used when translating at initial recognition during the period or in the financial statements are taken to the statement of comprehensive income in the period they arise.

1.8 Borrowing costs

Borrowing costs directly attributable to the acquisition, construction or production of an asset that necessarily takes a substantial period of time to get ready for its intended use or sale are capitalised as part of the cost of the respective assets. All other borrowing costs are expensed in the period they occur. Borrowing costs consist of interest and other costs that an entity incurs in connection with the borrowing of funds. *The Regulatory Authority* had no eligible assets or borrowing costs for the period reported.

1.9 Employment benefits

Pension

The Regulatory Authority operates a defined contribution scheme for the employees. Payments to the scheme are charged as an expense to the statement of comprehensive income as they fall due.

Gratuity

The Regulatory Authority provides for gratuity benefits for employees on fixed term contracts in line with the Employment Act Chapter 47:01 and the relevant employment contracts. Gratuity expenses are recognised immediately, to the extent that the benefits are amortised on a straight-line basis over the period of service, until the benefits become payable. The charge is made to expenses in the statement of comprehensive income and a separate provision in the statement of financial position.

Leave pay provision

The Regulatory Authority recognises, in full, employee's right to annual leave entitlement in respect of past service. The recognition is made each year and is calculated based on accrued leave days not taken during the year. The charge is made to expenses in the statement of comprehensive income and a separate provision in the statement of financial position.

Accounting Policies (cont.) for the year ended 31 March 2018

1.10 Government grants

Government grants are recognised when there is reasonable assurance that:

- **the Regulatory Authority** will comply with the conditions attaching to them; and
- the grants will be received.

Government grants are recognised as income over the periods necessary to match them with the related costs that they are intended to compensate. A government grant that becomes receivable as compensation for expenses or losses already incurred or for the purpose of giving immediate financial support to **the Regulatory Authority** with no future related costs is recognised as income of the period in which it becomes receivable.

Government grants related to assets, including non-monetary grants at fair value, are presented in the statement of financial position by setting up the grant as Government grants under liabilities or by deducting the grant in arriving at the carrying amount of the asset.

Grants relating to the acquisition of property, plant and equipment are credited to the income statement on a straight line basis over the expected useful lives of the related assets. The related costs are shown at cost less accumulated depreciation. When an asset financed through grants is disposed of, the total unamortised portion of the grant relating to the asset is recognised in profit and loss in the year of disposal.

1.11 Financial instruments

Cash and cash equivalents

For the purpose of the cash flow statement, cash and cash equivalents consist of cash, cash deposits on call and short-term fixed deposit accounts in banks. Cash and cash equivalents are subsequently carried at amortised cost. Due to the short-term nature of these, the amortised cost approximates its fair value.

Initial recognition

Financial assets within the scope of IAS 39 are classified as loans and receivables. When financial assets are recognised initially, they are measured at fair value, including transaction costs except for instruments at fair value through surplus or deficit. All regular way purchases and sales of financial assets are recognised on the trade date, which is the date that **the Regulatory Authority** commits to purchase the assets. Regular way purchases and sales are purchases or sales of financial assets that require delivery of assets within the period generally established by regulation or convention in the marketplace.

The Regulatory Authority's financial assets include cash and cash equivalents and trade and other receivables.

Financial assets

Subsequent measurement

The subsequent measurement of financial assets depends on their classification as follows:

Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. After initial measurement loans and receivables are carried at amortised cost using the effective interest method less any allowance for impairment. Gains and losses are recognised in the surplus or deficit when the loans and receivables are derecognised or impaired, as well as through amortisation process.

Loans and receivables consist of trade and other receivables and cash and cash equivalents.

Accounting Policies (cont.) for the year ended 31 March 2018

1.11 Financial instruments (continued)

Impairment of financial assets

The Regulatory Authority assesses at each reporting date whether a financial asset or group of financial assets is impaired.

If there is objective evidence that an impairment loss on assets carried at amortised cost has been incurred, the amount of the loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows (excluding future expected credit losses that have not been incurred) discounted at the financial asset's original effective interest rate (i.e. the effective interest rate computed at initial recognition). The carrying amount of the asset is reduced through use of a separate allowance account, namely provision for doubtful debts accounts. The amount of the loss is recognised in surplus or deficit. In relation to financial assets, a provision for impairment is made when there is objective evidence (such as the probability of insolvency or significant financial difficulties of the debtor) that *the Regulatory Authority* will not be able to collect all of the amounts due under the original terms of the invoice. The carrying amount of receivable is reduced through use of an allowance account. Impaired debts are derecognised when they are assessed as uncollectable.

Financial liabilities

Initial recognition

Financial liabilities within the scope of IAS 39 are classified as loans and borrowings. *The Regulatory Authority* determines the classification of its financial liabilities on initial recognition. Loans and borrowings are carried subsequent to initial measurement at amortised cost using the effective interest method. Gains and losses are recognised in surplus or deficit when the loans and borrowings are derecognised as well as through the amortisation process. *The Regulatory Authority's* financial liabilities include trade and other payables.

Amortised cost

Amortised cost is computed using the effective interest method less any allowance for impairment and principal repayment or reduction. The calculation takes into account any premium or discount on acquisition and includes transaction costs and fees that are an integral part of the effective interest rate.

Offsetting

Financial assets and liabilities are offset and the net amount reported in the statement of financial position when there is a currently legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

Derecognition of financial instruments

Financial assets

A financial asset (or, where applicable a part of a financial asset or part of a group of similar financial assets) is derecognised when:

The rights to receive cash flows from the asset have expired.

The Regulatory Authority has transferred its right to receive cash flows from the asset or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a 'pass-through' arrangement; and either

- a. *the Regulatory Authority* has transferred substantially all the risks and rewards of the asset, or
- b. *the Regulatory Authority* has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

When *the Regulatory Authority* has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement, and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognised to the extent of *the Regulatory Authority's* continuing involvement in the asset.



Accounting Policies (cont.) for the year ended 31 March 2018

1.11 Financial instruments (continued)

Financial guarantee contracts

Financial guarantee contracts issued by *the Regulatory Authority* are those contracts that require a payment to be made to reimburse the holder for a loss it incurs because the specified debtor fails to make a payment when due in accordance with the terms of a debt instrument. Financial guarantee contracts are recognised initially as a liability at fair value, adjusted for transaction costs that are directly attributable to the issuance of the guarantee. Subsequently, the liability is measured at the higher of the best estimate of the expenditure required to settle the present obligation at the reporting date and the amount recognised less cumulative amortisation.

Offsetting

Financial assets and liabilities are offset and the net amount reported in the statement of financial position when there is a currently legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

In that case, *the Regulatory Authority* also recognises an associated liability. The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that *the Regulatory Authority* has retained. Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying amount of the asset and the maximum amount of consideration that *the Regulatory Authority* could be required to repay.

Financial liabilities

A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the statement of comprehensive income.

1.12 Provisions

Provisions are recognised when *the Regulatory Authority* has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources will be required to settle the obligation; and a reliable estimate of the amount can be made. Provisions are measured at the directors' best estimate of expenditure required to settle the obligation at the reporting date, and are discounted to present value where the effect of the time value of money is material.

1.13 Leases

The determination of whether an arrangement is, or contains, a lease is based on the substance of the arrangement at inception date: whether fulfillment of the arrangement is dependent on the use of a specific asset or assets or the arrangement conveys a right to use the asset.

Minimum operating lease payments of an operating lease are recognised as an expense in the surplus or deficit on a straight line basis over the lease term.

2. NEW STANDARDS AND INTERPRETATIONS

2.1 Standards and interpretations not yet effective

The Regulatory authority has chosen not to early adopt the following standards and interpretations, which have been published and are mandatory for **the Regulatory Authority's** accounting periods beginning on or after 01 April 2018 or later periods:

IFRS 16 Leases

IFRS 16 Leases is a new standard which replaces IAS 17 Leases, and introduces a single lessee accounting model. The main changes arising from the issue of IFRS 16 which are likely to impact **the Regulatory Authority** are as follows:

Authority as lessee:

- Lessees are required to recognise a right-of-use asset and a lease liability for all leases, except short term leases or leases where the underlying asset has a low value, which are expensed on a straight line or other systematic basis.
- The cost of the right-of-use asset includes, where appropriate, the initial amount of the lease liability; lease payments made prior to commencement of the lease less incentives received; initial direct costs of the lessee; and an estimate for any provision for dismantling, restoration and removal related to the underlying asset.
- The lease liability takes into consideration, where appropriate, fixed and variable lease payments; residual value guarantees to be made by the lessee; exercise price of purchase options; and payments of penalties for terminating the lease.
- The right-of-use asset is subsequently measured on the cost model at cost less accumulated depreciation and impairment and adjusted for any re-measurement of the lease liability. However, right-of-use assets are measured at fair value when they meet the definition of investment property and all other investment property is accounted for on the fair value model. If a right-of-use asset relates to a class of property, plant and equipment which is measured on the revaluation model, then that right-of-use asset may be measured on the revaluation model.
- The lease liability is subsequently increased by interest, reduced by lease payments and re-measured for reassessments or modifications.
- Re-measurements of lease liabilities are affected against right-of-use assets, unless the assets have been reduced to nil, in which case further adjustments are recognised in profit or loss.
- The lease liability is re-measured by discounting revised payments at a revised rate when there is a change in the lease term or a change in the assessment of an option to purchase the underlying asset.
- The lease liability is re-measured by discounting revised lease payments at the original discount rate when there is a change in the amounts expected to be paid in a residual value guarantee or when there is a change in future payments because of a change in index or rate used to determine those payments.
- Certain lease modifications are accounted for as separate leases. When lease modifications which decrease the scope of the lease are not required to be accounted for as separate leases, then the lessee re-measures the lease liability by decreasing the carrying amount of the right of lease asset to reflect the full or partial termination of the lease. Any gain or loss relating to the full or partial termination of the lease is recognised in profit or loss. For all other lease modifications which are not required to be accounted for as separate leases, the lessee re-measures the lease liability by making a corresponding adjustment to the right-of-use asset.
- Right-of-use assets and lease liabilities should be presented separately from other assets and liabilities. If not, then the line item in which they are included must be disclosed. This does not apply to right-of-use assets meeting the definition of investment property which must be presented within investment property. IFRS 16 contains different disclosure requirements compared to IAS 17 leases.

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

2.1 Standards and interpretations not yet effective (continued)

Authority as lessor:

- Accounting for leases by lessors remains similar to the provisions of IAS17 in that leases are classified as either finance leases or operating leases. Lease classification is reassessed only if there has been a modification.
- A modification is required to be accounted for as a separate lease if it both increases the scope of the lease by adding the right to use one or more underlying assets; and the increase in consideration is commensurate to the stand alone price of the increase in scope.
- If a finance lease is modified, and the modification would not qualify as a separate lease, but the lease would have been an operating lease if the modification was in effect from inception, then the modification is accounted for as a separate lease. In addition, the carrying amount of the underlying asset shall be measured as the net investment in the lease immediately before the effective date of the modification. IFRS 9 is applied to all other modifications not required to be treated as a separate lease.
- Modifications to operating leases are required to be accounted for as new leases from the effective date of the modification. Changes have also been made to the disclosure requirements of leases in the lessor's financial statements.

Sale and leaseback transactions:

- In the event of a sale and leaseback transaction, the requirements of IFRS 15 are applied to consider whether a performance obligation is satisfied to determine whether the transfer of the asset is accounted for as the sale of an asset.
- If the transfer meets the requirements to be recognised as a sale, the seller-lessee must measure the new right-of-use asset at the proportion of the previous carrying amount of the asset that relates to the right-of-use retained. The buyer-lessor accounts for the purchase by applying applicable standards and for the lease by applying IFRS 16
- If the fair value of consideration for the sale is not equal to the fair value of the asset, then IFRS16 requires adjustments to be made to the sale proceeds. When the transfer of the asset is not a sale, then the seller-lessee continues to recognise the transferred asset and recognises a financial liability equal to the transfer proceeds. The buyer-lessor recognises a financial asset equal to the transfer proceeds.

The effective date of the standard is for years beginning on or after 01 January 2019.

The Regulatory Authority expects to adopt the standard for the first time in the 2020 annual financial statements.

It is unlikely that the standard will have a material impact on **the Regulatory Authority's** annual financial statements.

IFRS 9 Financial Instruments

IFRS 9 issued in November 2009 introduced new requirements for the classification and measurements of financial assets. IFRS 9 was subsequently amended in October 2010 to include requirements for the classification and measurement of financial liabilities and for derecognition, and in November 2013 to include the new requirements for general hedge accounting. Another revised version of IFRS 9 was issued in July 2014 mainly to include a) impairment requirements for financial assets and b) limited amendments to the classification and measurement requirements by introducing a “fair value through other comprehensive income” (FVTOCI) measurement category for certain simple debt instruments.

IFRS 9 Financial Instruments (continued)

Key requirements of IFRS 9:

- All recognised financial assets that are within the scope of IAS 39 Financial Instruments: Recognition and Measurement are required to be subsequently measured at amortised cost or fair value. Specifically, debt investments that are held within a business model whose objective is to collect the contractual cash flows, and that have contractual cash flows that are solely payments of principal and interest on the outstanding principal are generally measured at amortised cost at the end of subsequent reporting periods. Debt instruments that are held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets, and that have contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on outstanding principal, are measured at FVTOCI. All other debt and equity investments are measured at fair value at the end of subsequent reporting periods. In addition, under IFRS 9, entities may make an irrevocable election to present subsequent changes in the fair value of an equity investment (that is not held for trading) in other comprehensive income with only dividend income generally recognised in profit or loss.
- With regard to the measurement of financial liabilities designated as at fair value through profit or loss, IFRS 9 requires that the amount of change in the fair value of the financial liability that is attributable to changes in the credit risk of the liability is presented in other comprehensive income, unless the recognition of the effect of the changes of the liability's credit risk in other comprehensive income would create or enlarge an accounting mismatch in profit or loss. Under IAS 39, the entire amount of the change in fair value of a financial liability designated as at fair value through profit or loss is presented in profit or loss.
- In relation to the impairment of financial assets, IFRS 9 requires an expected credit loss model, as opposed to an incurred credit loss model under IAS 39. The expected credit loss model requires an entity to account for expected credit losses and changes in those expected credit losses at each reporting date to reflect changes in credit risk since initial recognition. It is therefore no longer necessary for a credit event to have occurred before credit losses are recognised.
- The new general hedge accounting requirements retain the three types of hedge accounting mechanisms currently available in IAS 39. Under IFRS 9, greater flexibility has been introduced to the types of transactions eligible for hedge accounting, specifically broadening the types of instruments that qualify for hedging instruments and the types of risk components of non-financial items that are eligible for hedge accounting. In addition, the effectiveness test has been replaced with the principal of an "economic relationship". Retrospective assessment of hedge effectiveness is also no longer required. Enhanced disclosure requirements about an entity's risk management activities have also been introduced.

The effective date of the standard is for years beginning on or after 01 January 2018.

The Regulatory Authority expects to adopt the standard for the first time in the 2019 annual financial statements.

It is unlikely that the standard will have a material impact on **the Regulatory Authority's** annual financial statements.

IFRS 15 Revenue from Contracts with Customers

IFRS 15 supersedes IAS 11 Construction contracts; IAS 18 Revenue; IFRIC 13 Customer Loyalty Programmes; IFRIC 15 Agreements for the construction of Real Estate; IFRIC 18 Transfers of Assets from Customers and SIC 31 Revenue - Barter Transactions Involving Advertising Services.

The core principle of IFRS 15 is that an entity recognises revenue to depict the transfer of promised goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. An entity recognises revenue in accordance with that core principle by applying the following steps:

- Identify the contract(s) with a customer
- Identify the performance obligations in the contract
- Determine the transaction price
- Allocate the transaction price to the performance obligations in the contract
- Recognise revenue when (or as) the entity satisfies a performance obligation.

IFRS 15 also includes extensive new disclosure requirements.

The effective date of the standard is for years beginning on or after 01 January 2018.

The Regulatory Authority expects to adopt the standard for the first time in the 2019 annual financial statements.

It is unlikely that the standard will have a material impact on **the Regulatory Authority's** annual financial statements.

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
3.	GOVERNMENT GRANTS		
	Revenue grants	16 360 914	15 934 537
	The total grant received from the government are as follows:		
	Revenue grants	16 360 914	15 934 537
	Capital grants	446 996	873 373
		16 807 910	16 807 910
4.	AMORTISATION OF GOVERNMENT GRANTS		
	Amortisation of property, plant and equipment	1 079 146	2 114 353
	Amortisation of intangible assets	5 419 158	5 419 159
		6 498 304	7 533 512
5.	OTHER OPERATING INCOME		
	Interest and penalties, registration and renewals	1 919 521	2 173 320
	Bad debts recovered	236 333	-
	Profit on sale of plant and equipment	-	27 000
	Sundry income	108 451	214 878
		2 264 305	2 415 198
6.	SUPERVISORY LEVIES		
	Supervisory levies- Capital Markets	190 560	211 750
	Supervisory levies- Lending	17 960 500	16 305 069
	Supervisory levies- Finance and leasing companies	517 050	-
	Supervisory levies- Insurance	9 555 036	9 367 327
	Supervisory levies- Retirement fund and investment institutions	14 486 838	13 308 465
	Supervisory levies- Medical Aid	2 329 501	-
	Total supervisory levies	45 039 485	39 192 611
7.	STAFF COSTS		
	Employee costs		
	Basic salaries	25 769 982	22 161 340
	Allowances	14 894 742	12 514 182
	Defined contribution plan expense	5 756 592	4 284 361
		46 421 316	38 959 883
8.	CONSULTANCY COSTS		
	Other consultancy costs	2 190 072	2 228 290

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
9.	ADMINISTRATION EXPENSES		
	Advertising	67 175	137 887
	Audit fees	254 809	104 976
	Bad debts	1 244 458	252 900
	Bank charges	65 780	57 799
	Depreciation	1 168 463	2 114 353
	Amortisation of RBSS and ERP	5 419 158	5 419 158
	Insurance	533 048	562 513
	Motor vehicle expenses	23 469	29 060
	Office expenses	54 966	490 955
	Operating lease expenses	3 129 227	3 173 046
	Postage	-	8 160
	Printing and stationary	509 100	268 186
	Recruitment	234 527	209 607
	Telephone and fax	599 624	749 466
	Travel	1 800 278	1 834 041
	Uniform	537 847	549 129
	Utilities	426 852	412 816
		16 068 781	16 374 052
10.	OTHER EXPENSES		
	Board costs	790 946	221 825
	Branding and communication	799 751	903 252
	Cleaning	180 819	191 450
	Computer expenses	613 536	575 736
	Legal fees	3 539 071	289 011
	Repairs and maintenance	27 487	84 531
	License fees	3 406 592	2 891 591
	Security	255 655	264 160
	Subscriptions	977 818	708 934
	Seminar and exhibitions	-	21 247
	Strategy expenses	91 464	-
	Training	1 515 265	2 051 735
		12 198 404	8 203 472
11.	FINANCE INCOME		
	Interest income		
	From investments in financial assets:		
	Bank	175 395	369 597

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018			2017		
		Cost	Accumulated depreciation	Carrying value	Cost	Accumulated depreciation	Carrying value
12.	PROPERTY, PLANT AND EQUIPMENT						
	Leasehold improvements	125 714	(125 714)	-	125 714	(125 710)	4
	Furniture and fixtures	5 202 343	(2 554 209)	2 648 134	5 249 519	(2 073 664)	3 175 855
	Motor vehicles	827 468	(687 485)	139 983	799 362	(581 494)	217 868
	Office equipment	563 430	(556 493)	6 937	563 430	(486 923) (1	76 507
	IT equipment	3 726 458	(1 992 944)	1 733 514	3 276 693	496 891)	1 779 802
	Total	10 445 413	(5 916 845)	4 528 568	10 014 718	(4 764 682)	5 250 036

Reconciliation of property, plant and equipment - 2018

	Opening balance	Additions	Transfers	Depreciation	Total
Leasehold improvements	4	-	-	(4)	-
Furniture and fixtures	3 175 855	-	(2 769)	(524 952)	2 648 134
Motor vehicles	217 868	-	-	(77 885)	139 983
Office equipment	76 507	-	-	(69 570)	6 937
IT equipment	1 779 802	446 995	2 769	(496 052)	1 733 514
	5 250 036	446 995	-	(1 168 463)	4 528 568

Reconciliation of property, plant and equipment - 2017

	Opening balance	Additions	Disposals	Depreciation	Total
Leasehold improvements	41 909	-	-	(41 905)	4
Furniture and fixtures	3 879 637	363 416	-	(1 067 198)	3 175 855
Motor vehicles	503 760	-	(5 070)	(280 822)	217 868
Office equipment	389 594	-	-	(313 087)	76 507
IT equipment	1 681 186	509 957	-	(411 341)	1 779 802
	6 496 086	873 373	(5 070)	(2 114 353)	5 250 036

Other information

Fully depreciated property, plant and equipment still in use 865 072 611 820

13. INTANGIBLE ASSETS

	Cost	Accumulated depreciation	Carrying value	Cost	Accumulated depreciation	Carrying value
Enterprise Resource Planning (ERP)	13 339 605	(5 335 842)	8 003 763	13 339 605	(2 667 921)	10 671 684
Risk Based Supervisory System (RBSS)	13 756 184	(7 795 171)	5 961 013	13 756 184	(5 043 934)	8 712 250
Total	27 095 789	(13 131 013)	13 964 776	27 095 789	(7 711 855)	19 383 934

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
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13. INTANGIBLE ASSETS (continued)

Reconciliation of intangible assets - 2018

	Opening balance	Amortisation	Total
Enterprise Resource Planning (ERP)	10 671 684	(2 667 921)	8 003 763
Risk Based Supervisory System (RBSS)	8 712 250	(2 751 237)	5 961 013
Total	19 383 934	(5 419 158)	13 964 776

Reconciliation of intangible assets - 2017

	Opening balance	Transfers	Amortisation	Total
Enterprise Resource Planning (ERP)	-	13 339 605	(2 667 921)	10 671 684
Risk Based Supervisory System (RBSS)	11 463 487	-	(2 751 237)	8 712 250
Total	11 463 487	13 339 605	(5 419 158)	19 383 934

❖	Figures In (BWP)	2018	2017
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14. TRADE AND OTHER RECEIVABLES

Supervisory levies receivables	380 602	1 278 033
Deposits	224 209	224 209
Other receivables	26 916	12 671
Total	631 727	1 514 913

Trade receivables relate mainly to Supervisory Levies outstanding from regulated entities. Receivables are measured at amortised cost using the effective interest method, less any impairments.

Other receivables are non-interest bearing and are generally on 30 days terms. Other receivables comprise interest receivable on term deposits. Staff advances are receivable over three months and do not attract any interest.

Fair value of trade and other receivables

The carrying amount of trade and other receivables approximate its fair value.

Trade and other receivables past due but not impaired

Trade and other receivables which are less than 3 months past due are not considered to be impaired. At 31 March 2018, P 7 601 (2017: P 11 250) were past due but not impaired.

The ageing of amounts past due but not impaired is as follows:

3 months past due	7 601	11 250
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Trade and other receivables impaired

As of 31 March 2018, trade and other receivables of P 1 785 299 (2017: P 1 190 565) were impaired and provided for. The amount of the provision was P 1 785 299 as of 31 March 2018 (2017: P 1 190 565).

The ageing of these loans is as follows:

Over 6 months	1 785 299	1 190 565
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Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
14.	TRADE AND OTHER RECEIVABLES (continued)		
	Reconciliation of provision for impairment of trade and other receivables		
	Opening balance	1 190 565	923 372
	Provision for impairment	1 244 459	252 900
	Amounts written off as uncollectable	(413 391)	-
	Unused amounts reversed	(236 334)	-
	Other	-	14 293
		1 785 299	1 190 565

15. CASH AND CASH EQUIVALENTS

Cash and cash equivalents consist of:

Cash on hand	742	3 845
Bank balances	5 496 929	4 055 348
Short-term deposits	6 120 274	12 171 950
	11 617 945	16 231 143

The cash and cash equivalents are earning interest at the floating rate based on a daily bank deposit rates. **The Regulatory Authority** has maintained separate gratuity account to ring-fence the post employment benefits relating to gratuity. Furthermore a separate Supervisory Levies Account is maintained from that of the Government Subvention Account.

The short term deposits investments comprise of highly liquid investments with maturity periods from three months or less.

The Regulatory Authority has maintained a short term deposit of P 6 120 274, which constitutes P 6 111 734 and accrued interest, towards statutory reserve and this deposit is not used for general operations of the organisation.

Credit quality of cash at bank and short term deposits, excluding cash on hand

The credit quality of cash at bank and short term deposits, excluding cash on hand that are neither past due nor impaired can be assessed by reference to historical information about counterparty default rates. Commercial Banks in Botswana are not rated, however, these financial institutions are subsidiaries of rated bank in South Africa.

16. GOVERNMENT GRANTS

Opening balance	24 274 269	33 608 748
Received during the year	447 064	873 373
Disposals during the year	-	(5 070)
Amount utilised recurrent expenses	-	(4 201 977)
Amortisation of government grants	(4 965 596)	(6 000 805)
	19 755 737	24 274 269

During the prior year, **the Regulatory Authority** received permission from the Ministry of Finance & Economic Development to utilizes an amount of (2017:P 4 201 977) from the funds which were advanced for the implementation of IT systems in financial year 2013/2014, which is equivalent to the 4th quarter subvention for 2016/17.

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
17.	AFRICAN DEVELOPMENT BANK GRANT		
	Opening balance	4 853 578	6 386 283
	Amortisation of African Development Bank grants	(1 532 711)	(1 532 705)
		3 320 867	4 853 578

African Development Bank has provided assistance to **the Regulatory Authority** in developing a Risk Based Regulatory System (RBSS). **The Regulatory Authority** recognises the assistance received from the African Development Bank of the model, the grant was capitalised as intangible asset and amortised over the useful lives of the 2018 2017 as a grant, and upon completion asset.

18.	TRADE AND OTHER PAYABLES		
	Trade payables	3 073 548	2 793 186
	Other payables	385 247	253 725
		3 458 795	3 046 911

Fair value of trade and other payables

The carrying amount of trade and other payables approximate its fair value.

19. SHORT TERM EMPLOYEE BENEFITS

Reconciliation of short term employee benefits - 2018

	Opening balance	Additions	Utilised during the year	Total
Gratuity accruals	333 615	784 283	(309 870)	808 028
Leave accruals	1 994 130	585 226	(84 230)	2 495 126
	2 327 745	1 369 509	(394 100)	3 303 154

Reconciliation of short term employee benefits - 2017

	Opening balance	Additions	Utilised during the year	Total
Gratuity accruals	1 406 757	848 816	(1 921 958)	333 615
Leave accruals	2 057 857	86 270	(149 997)	1 994 130
	3 464 614	935 086	(2 071 955)	2 327 745

20. TAXATION

No provision for taxation is required as **the Regulatory Authority** is exempt from taxation in terms of the Second Schedule of the Income Tax Act (Chapter 52:01).

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
21.	CASH USED IN OPERATIONS		
	Deficit for the year	(6 540 170)	(320 242)
	Adjustments for:		
	Depreciation	6 587 621	7 533 511
	Loss on disposal of assets	(2 264 305)	(2 415 198)
	Amortisation of government grants	(6 526 477)	(7 533 513)
	Finance income	(175 395)	(369 597)
	Deferred operating lease	(432 825)	(261 467)
	Movements in short term employee benefits	975 409	(1 136 869)
	Capital grant utilised for recurrent budget	-	(4 201 977)
	Changes in operating funds:		
	Trade and other receivables	883 185	(1 217 261)
	Trade and other payables	411 884	(1 077 396)
		(7 081 073)	(11 000 009)
22.	OPERATING LEASE LIABILITY		
	Current liabilities	(13 979)	(446 804)
23.	COMMITMENTS		
	Operating lease commitments		
	<i>The Regulatory Authority</i> has entered into a commercial property lease with Exponential Building for a period of five (5) years to February 2021, with an escalation of 6% annually. The future aggregate minimum lease rentals as at 31 March 2017 are as follows:		
	Minimum lease payments due		
	- within one year	2 754 745	3 355 429
	- in second to fifth year inclusive	5 743 210	-
		8 497 955	3 355 429

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
24. RELATED PARTIES			
Relationships			
<p><i>The Regulatory Authority</i> was set up by the Non-Bank Financial Institutions Regulatory Authority Act, 2016 and is therefore related to the Government of the Republic of Botswana. Transactions with related parties are in the normal course of business. The following transaction were carried out with related parties;</p>			
Members of key management			
Mr Ramasedi			
Mr Segage			
Mr Gade			
Mrs Seromelo			
Ms Modisa			
Mrs Masike			
Mrs Makepe			
Mr Balopi			
Mr Dumedisang			
Mr Ncaagae			
Mr Rampha			
Mrs Mpai			
Ms Modongo			
Mrs White			
Mrs Raphaka			
Ms Soko			
Ms Mongati			
Related party balances			
Amounts included in Trade receivable (Trade Payable) regarding related parties			
Botswana Telecommunications Corporation- Internet, telephone & fax		-	10 319
Related party transactions			
Grants received			
Government of the Republic of Botswana		16 807 910	16 807 910
Transactions with other parastatals			
Botswana Telecommunications Corporation- Internet, telephone & fax		245 622	363 413
Compensation to directors and other key management			
Short term employment benefits		12 014 789	12 398 093
Gratuity & pension benefits		1 986 055	1 581 703
Other benefits		1 575 943	729 262
		15 576 787	14 709 058

Compensation paid to key personnel of *the Regulatory Authority*. The amounts presented comprise 17 executive staff members (2017: 17 executive staff members). Two of the members were on acting appointments.

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018					Total
		Note	Loans and receivables	Financial liabilities at amortised cost	Leases	Equity and non financial assets and liabilities	
25.	CATEGORIES OF FINANCIAL INSTRUMENTS						
	Categories of financial instruments - 2018						
	Assets						
	Non-Current Assets						
	Property, plant and equipment	12	-	-	-	4 528 568	4 528 568
	Intangible assets	13	-	-	-	13 964 776	13 964 776
			-	-	-	18 493 344	18 493 344
	Current Assets						
	Trade and other receivables	14	631 727	-	-	-	631 727
	Cash and cash equivalents	15	11 617 945	-	-	-	11 617 945
			12 249 672	-	-	-	12 249 672
	Total Assets		12 249 672	-	-	18 493 344	30 743 016
	Funds and Liabilities						
	Funds						
	Equity Attributable to Equity Holders of Parent:						
	Statutory reserves		-	-	-	3 390 792	3 390 792
	Accumulated funds		-	-	-	(2 500 240)	(2 500 240)
			-	-	-	890 552	890 552
	Total Funds		-	-	-	890 552	890 552
	Liabilities						
	Non-Current Liabilities						
	Government grants	16	-	-	-	19 755 669	19 755 669
	African Development Bank grant	17	-	-	-	3 320 867	3 320 867
			-	-	-	23 076 536	23 076 536
	Current Liabilities						
	Trade and other payables	18	-	3 458 795	-	-	3 458 795
	Operating lease liability	22	-	-	13 979	-	13 979
	Short term employee benefits	19	-	-	-	3 303 154	3 303 154
			-	3 458 795	13 979	3 303 154	6 775 928
	Total Liabilities		-	3 458 795	13 979	26 379 690	29 852 464
	Total Funds and liabilities		-	3 458 795	13 979	27 270 242	30 743 016

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)		2018	2017	2016	2015	2014
	Note	Loans and receivables	Financial liabilities at amortised cost	Leases	Equity and non financial assets and liabilities	Total	
25.	CATEGORIES OF FINANCIAL INSTRUMENTS (continued)						
Categories of financial instruments - 2017							
Assets							
Non-Current Assets							
	12	-	-	-	5 250 036	5 250 036	
	13	-	-	-	19 383 934	19 383 934	
					24 633 970	24 633 970	
Current Assets							
	14	1 514 913	-	-	-	1 514 913	
	15	16 231 143	-	-	-	16 231 143	
		17 746 056	-	-	-	17 746 056	
		17 746 056	-	-	24 633 970	42 380 026	
Total Assets							
Funds							
Equity Attributable to Equity Holders of Parent:							
		-	-	-	5 765 793	5 765 793	
		-	-	-	1 664 929	1 664 929	
		-	-	-	7 430 722	7 430 722	
		-	-	-	7 430 722	7 430 722	
Liabilities							
Non-Current Liabilities							
	16	-	-	-	24 274 269	24 274 269	
	17	-	-	-	4 853 575	4 853 575	
		-	-	-	29 127 844	29 127 844	
Current Liabilities							
	18	-	3 046 911	-	-	3 046 911	
	22	-	-	446 804	-	446 804	
	19	-	-	-	2 327 745	2 327 745	
		-	3 046 911	446 804	2 327 745	5 821 460	
		-	3 046 911	446 804	31 455 589	34 949 304	
		-	3 046 911	446 804	38 886 311	42 380 026	

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
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26. RISK MANAGEMENT

Capital risk management

Capital includes all funds and reserves as per the face of the statement of financial position. **The Regulatory Authority's** objective when managing capital are to safeguard its ability to continue as a going concern in order to perform the mandate for which it was created for. Management is of the view that these objective are being met. During 2018, **the Regulatory Authority** did not have borrowings. **The Regulatory Authority** is supported by the licensed Non-Bank Financial Institutions and the Government of the Republic of Botswana, currently the necessary support is provided to sustain the operations of **the Regulatory Authority**. The NBFIRA Act stipulates that an annual estimate of **the Regulatory Authority's** expenditure for a financial year shall include provision for a Statutory Reserve of not more than 10% of the total expenditure provided in the estimate.

Based on **the Regulatory Authority** Act the current statutory reserve is adequate and in line with the provisions of the Act.

Financial risk management

Liquidity risk

The Regulatory Authority's approach to managing liquidity is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities when due, without incurring losses or risking damage to **the Regulatory Authority's** reputation. The ultimate responsibility for liquidity risk management procedures for the management of **the Regulatory Authority's** funding and liquidity management requirements.

The Regulatory Authority manages liquidity risk by maintaining adequate cash and cash equivalents to settle liabilities when they become due, by continuously monitoring forecasts actual cash flows, and by matching the Government Subvention to the maturity profile of the financial liabilities.

The following table summarises the maturity profile of **the Regulatory Authority's** financial liabilities as at 31 March 2018 based on contractual undiscounted payments:

At 31 March 2018	Less than 1 year
Trade and other payables	3 458 795
At 31 March 2017	Less than 1 year
Trade and other payables Interest rate risk	3 046 911

Interest rate risk

Financial instruments that are sensitive to interest rate risk are bank balances and cash (refer to note 7). Interest rates applicable to these financial instruments compare favourably with those currently available in the market. The following table demonstrates the sensitivity to a reasonable possible change in interest rates at reporting date, with all other variables held constant, of **the Regulatory Authority's** (deficit)/surplus for the year (through the impact on floating rate financial instruments), funds and reserves at reporting date. The reasonable possible change is based on past trends of interest and expected future changes. The impact was calculated by applying the reasonable changes to the exposures at reporting date, and with reference to the next 12 months. There is no other direct impact on **the Regulatory Authority's** funds and reserves.

Increase of 0.5% in interest rate	58 086	77 900
Decrease of 2% in interest	(232 344)	(311 601)
	(174 258)	(233 701)

Notes to the Annual Financial Statements (cont.) for the year ended 31 March 2018

❖	Figures In (BWP)	2018	2017
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26. RISK MANAGEMENT (continued)

Credit risk

The Regulatory Authority has exposure to credit risk, which is the risk that a counterparty will be unable to pay amounts in full when due. Credit risk is the risk that the regulated and supervised Non-Bank Financial Institutions and other counter parties will not be able or willing to pay or fulfil their obligations in accordance with Non-Bank Financial Institutions Regulatory Authority Act. **The Regulatory Authority** uses reputable financial institutions for investing purposes.

All cash and cash equivalents are placed with financial institutions registered in Botswana.

The maximum exposure to credit risk is represented by the carrying amount of accounts receivable and cash and cash equivalents, as shown in the statement of financial position.

Significant concentration of credit

The Regulatory Authority is currently funded by the Government of Botswana and the regulated entities through Supervisory Levies and License Fees. **The Regulatory Authority's** credit risk is primarily attributable to its cash and cash equivalents, and receivable from regulated entities. Financial assets that potentially subject the Board to concentration of credit risk consists primarily of cash and cash equivalent as well as accounts receivable. Cash and cash equivalents are placed with reputable financial institutions in the normal trading course. Expenditure and controls have been put in place to manage credit risk. **The Regulatory Authority** has no significant concentration of credit risk as its exposure is spread over a number of counterparties.

The Regulatory Authority does not have any significant credit risk exposure to any single counterparty. As at year end there was no significant credit risk, the cash position as at year end was P 11 617 945 (2017 : P 16 227 298)

Financial instrument

Stanbic Bank of Botswana Limited- bank balances Stanbic Bank of Botswana	5 496 929	4 055 348
Limited- short term deposits	6 120 274	12 171 950



“Continuing to do more; A decade of financial stability”

Detailed Income Statement for the year ended 31 March 2018

Figures In (BWP)	Note	2018	2017
Revenue			
Government grants		16 360 914	15 934 537
Supervisory levies	6	45 039 485	39 192 611
Total revenue		61 400 399	55 127 148
Other operating income			
Fees Earned		1 079 146	2 114 353
Amortisation of Capital Grants		5 419 158	5 419 159
	4	6 498 304	7 533 512
Other operating gains (losses)			
Gains on disposal of assets or settlement of liabilities		2 264 305	2 415 198
Expenses (Refer to page 35)		(76 878 573)	(65 765 697)
Operating loss		(6 715 565)	(689 839)
Investment income	11	175 395	369 597
Deficit for the year		(6 540 170)	(320 242)

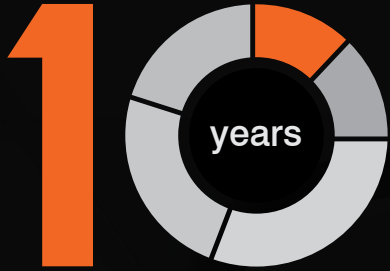
The supplementary information presented does not form part of the annual financial statements and is unaudited

Detailed Income Statement (cont.) for the year ended 31 March 2018

Figures In (BWP)	Note	2018	2017
Other operating expenses			
Advertising		(67 175)	(137 887)
Amortisation		(5 419 158)	(5 419 158)
Auditors remuneration - external auditors		(254 809)	(104 976)
Bad debts		(1 244 458)	(252 900)
Bank charges		(65 780)	(57 799)
Board fees		(790 946)	(221 825)
Branding and communications		(799 751)	(903 252)
Cleaning		(180 819)	(191 450)
Computer expenses		(613 536)	(575 736)
Consulting and professional fees		(2 190 072)	(2 228 290)
Consulting and professional fees - legal fees		(3 539 071)	(289 011)
Depreciation		(1 168 463)	(2 114 353)
Employee costs		(46 421 316)	(38 959 883)
Insurance		(533 048)	(562 513)
Lease rentals on operating lease		(3 129 227)	(3 173 046)
License fees		(3 406 592)	(2 891 591)
Motor vehicle expenses		(23 469)	(29 060)
Office expenses		(54 966)	(490 955)
Postage		-	(8 160)
Printing and stationery		(509 100)	(268 186)
Recruitment		(234 527)	(209 607)
Repairs and maintenance		(27 487)	(84 531)
Security		(255 655)	(264 160)
Seminars and exhibitions		-	(21 247)
Strategy expenses		(91 464)	-
Subscriptions		(977 818)	(708 934)
Telephone and fax		(599 624)	(749 466)
Training		(1 515 265)	(2 051 735)
Travel		(1 800 278)	(1 834 041)
Uniform		(537 847)	(549 129)
Utilities		(426 852)	(412 816)
		(76 878 573)	(65 765 697)

The accounting policies on pages 78 to 84 and the notes on pages 85 to 99 form an integral part of the annual financial statements.

The supplementary information presented does not form part of the annual financial statements and is unaudited



Appendices



Appendix 1: 2017 Financials for Life Insurers

INSURER PERIOD END	BARCLAYS LIFE 31-Dec	BIFM 31-Dec	BLIL 31-Dec	BONA LIFE 31-Mar	HOLLARD LIFE 30-Jun	LIBERTY LIFE 31-Dec	METROPOLITAN LIFE 30-Jun	REGENT LIFE 30-Jun	OLD MUTUAL LIFE	TOTALS *****
	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)
INCOME STATEMENT										
Gross Premium Written	175,216,000	-	2,351,260,000	335,747,265	45,602,781	113,582,314	553,873,000	150,766,077	3,703,074	3,729,750,511
Premiums Ceded	14,958,000	-	31,214,000	727,312	18,527,590	8,481,128	19,072,000	10,120,404	3,703,074	106,803,508
Net Premiums Written	160,258,000	-	2,320,046,000	335,019,953	27,075,191	105,101,186	534,801,000	140,645,673	-	3,622,947,003
Change in UPR	21,219,000	-	585,800,000	329,764,988	(2,322,399)	5,504,834	90,374,000	(4,436,738)	-	1,025,903,685
Net Premiums Earned	139,039,000	-	1,734,246,000	5,254,965	29,397,590	99,596,352	444,427,000	145,082,411	-	2,597,043,318
Gross incurred claims	52,543,000	-	1,381,519,000	17,557,725	29,633,090	34,205,668	287,542,000	27,998,809	2,297,715	1,833,297,007
less Reinsurance share of claims	11,119,000	-	6,992,000	-	19,276,095	4,221,765	30,927,000	921,863	2,297,715	75,755,438
Net incurred claims	41,424,000	-	1,374,527,000	17,557,725	10,356,995	29,983,903	256,615,000	27,076,946	-	1,757,541,569
Gross Acquisition Costs	45,433,000	-	338,712,000	2,098,082	5,458,403	22,429,956	143,824,000	64,177,737	386,237	622,518,415
less Reinsurance commission	-	-	-	-	3,621,959	-	-	-	386,237	4,008,196
Net acquisition costs	45,433,000	-	338,712,000	2,098,082	1,836,444	22,428,956	143,824,000	64,177,737	-	618,510,219
Operating Expenses	44,324,000	316,851,860	266,090,000	17,695,890	20,816,302	26,179,803	72,591,000	22,583,700	10,646,580	797,779,135
Underwriting Expenses	131,181,000	316,851,860	1,979,329,000	37,351,697	33,009,741	78,592,662	473,030,000	113,838,383	10,646,580	3,173,830,923
Total Underwriting Income	7,858,000	(316,851,860)	(245,083,000)	(32,096,732)	(3,612,151)	21,003,690	(28,603,000)	31,244,028	(10,646,580)	(576,787,605)
Investments Income	7,594,000	452,710,744	567,146,000	31,037,868	1,037,256	3,179,158	68,323,000	17,807,442	213,339	1,149,048,807
Other Income	-	88,700,125	12,254,000	3,902,650	4,189,319	1,543,943	20,053,000	372,363	(734,482)	130,280,918
Net Profit Before Taxes	15,452,000	224,559,009	334,317,000	2,843,786	1,614,424	25,726,791	59,773,000	49,423,833	(11,167,723)	702,542,120
Tax	1,837,000	24,847,033	67,804,000	(48,832)	(48,832)	5,748,314	10,608,000	10,109,899	-	120,905,414
Net Income After Tax	13,615,000	199,711,976	266,513,000	2,843,786	1,663,256	19,978,477	49,165,000	39,313,934	(11,167,723)	581,636,706
BALANCE SHEET										
Cash and Equivalents	10,538,000	4,963,606	180,917,000	307,957,579	46,125,455	6,094,596	211,501,000	209,107,585	10,874,904	988,079,725
Fixed Assets	5,608,000	296,037,811	11,557,272,000	232,053,769	1,158,540	1,789,669	5,801,000	384,944	287,210	12,100,392,943
Other Current Assets	238,620,000	5,733,344,913	282,371,000	907,260	34,260,169	101,890,342	1,903,822,000	36,162,009	4,917,481	8,336,295,174
Total Assets	254,766,000	6,034,346,330	12,020,560,000	540,918,608	81,544,164	109,774,607	2,121,124,000	245,654,538	16,079,595	21,424,767,842
Insurance Liabilities	176,433,000	5,659,717,102	9,392,358,000	373,274,906	65,069,151	28,782,668	1,649,668,000	37,372,944	4,483,337	17,387,159,108
Long-term Liabilities	11,719,000	-	2,767,000	45,437	3,025,234	-	3,693,000	84,598,163	347,759	106,195,593
Other Current Liabilities	3,460,000	97,739,122	587,635,000	137,507,026	8,395,657	24,670,226	123,590,000	1,815,894	5,552,793	990,365,718
Total Liabilities	191,612,000	5,757,456,224	9,982,760,000	510,827,369	76,490,042	53,452,894	1,776,951,000	123,787,001	10,383,889	18,483,720,414
Share Capital	21,370,000	38,806,269	79,772,000	50,000,000	3,490,000	10,000,000	83,271,000	15,887,895	20,000,000	322,597,164
Reserves	-	51,423,319	910,532,000	710,946	891,186	23,694,706	18,917,000	103,869,207	-	1,110,038,364
Retained Earnings	41,784,000	186,660,518	1,047,496,000	(20,619,707)	672,936	22,627,007	241,985,000	2,110,435	(14,304,294)	1,508,411,895
Total Capital	63,154,000	276,890,106	2,037,800,000	30,091,239	5,054,122	56,321,713	344,173,000	121,867,537	5,695,706	2,941,047,423
Total Liabilities & Equity	254,766,000	6,034,346,330	12,020,560,000	540,918,608	81,544,164	109,774,607	2,121,124,000	245,654,538	16,079,595	21,424,767,842

Source: Audited financial statements and statutory returns from insurers

Appendix 2: 2017 Financials for General Insurers

INSURER	ALPHA DIRECT	BECI	BIC	LEGAL GUARD	HOLLARD GENERAL	OLD MUTUAL SHORT TERM INSURANCE	PHOENIX	PREFSURE	REGENT GENERAL	SESIRO	SUNSHINE	BRYTE	TOTALS
PERIOD END	30-Jun	30-Jun	31-Dec	31-Dec	30-June	31-Dec	31-Dec	31-Dec	30-Jun	31-Dec	30-Jun	31-Dec	*****
INCOME STATEMENT	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)	(Pula)
Gross Premium Written	23,094,512	12,633,981	286,285,968	44,892,014	159,910,946	167,809,000	16,130,755	-	257,124,203	118,339,557	10,512,806	164,958,000	1,261,691,742
Premiums Ceded	7,429,510	4,788,448	133,522,077	-	56,767,000	63,388,000	8,264,525	-	35,091,191	96,796,932	2,116,080	37,533,000	445,696,763
Net Premiums Written	15,665,002	7,845,533	152,763,891	44,892,014	103,143,946	104,421,000	7,866,230	-	222,033,012	21,542,625	8,396,726	127,425,000	815,994,979
Change in UPR	(2,006,932)	-	-	-	(850,427)	(123,000)	3,455,564	2,016,403	7,018,634	(1,272,852)	-	(3,775,000)	4,462,390
Net Premiums Earned	17,671,934	7,845,533	152,763,891	44,892,014	103,994,373	104,544,000	11,321,794	2,016,403	215,014,378	20,269,773	8,396,726	123,650,000	812,380,819
Gross Incurred Claims	22,264,409	8,805,690	98,724,794	16,752,675	90,269,637	120,650,000	3,777,108	47,388	130,380,626	39,031,648	7,071,004	93,452,000	631,226,979
less Reinsurance share of claims	11,333,428	2,511,058	27,788,300	-	31,743,264	39,487,000	-	-	4,734,323	13,548,094	-	19,143,000	150,288,467
Net incurred claims	10,930,981	6,294,632	70,936,494	16,752,675	58,526,373	81,163,000	3,777,108	47,388	125,646,303	25,483,554	7,071,004	74,309,000	480,958,512
Gross Acquisition Costs	906,822	-	41,970,171	944,748	28,867,071	31,954,000	1,547,018	5,751,177	44,614,936	-	844,623	26,745,000	184,145,566
less Reinsurance commission	2,540,654	92,921	-	-	13,133,772	15,300,000	798,754	-	7,833,038	7,551,916	1,261,414	8,697,000	57,209,469
Net acquisition costs	(1,633,832)	(92,921)	41,970,171	944,748	15,733,299	16,654,000	748,264	-	36,781,898	(7,551,916)	(416,791)	18,048,000	121,184,920
Operating Expenses	13,846,421	12,533,186	51,619,631	26,414,149	34,735,284	19,585,000	8,306,113	5,751,177	39,104,465	6,577,368	5,163,978	18,269,000	241,405,772
Underwriting Expenses	22,843,570	18,734,897	164,546,296	44,111,572	106,994,956	117,402,000	12,831,485	5,798,565	201,532,666	24,509,006	11,818,191	110,626,000	843,549,204
Total Underwriting Income	(4,971,636)	(10,889,364)	(11,782,405)	780,442	(5,000,583)	(12,858,000)	(1,509,691)	(3,782,162)	13,481,712	(4,239,233)	(3,421,465)	13,024,000	(31,168,385)
Investments Income	(8,173)	160,460	1,878,157	522,152	3,331,965	4,167,000	23,578	147,017	9,611,051	1,748,999	802,194	7,757,000	30,141,400
Other Income	-	6,016,980	14,278,714	137,704	2,338,830	12,000	259,625	-	70,000	7,692,857	3,286,509	2,960,000	37,053,219
Net Profit Before Taxes	(4,979,809)	(4,711,924)	4,374,486	1,440,298	670,212	(6,679,000)	(1,226,488)	(3,695,145)	23,162,763	5,202,623	667,238	23,741,000	36,026,234
Tax	1,083,415	1,026,380	5,719,353	(47,199)	146,853	(173,000)	297,613	(669,636)	5,106,229	2,092	10,858	4,749,000	17,251,958
Net Income After Tax	(3,896,394)	(3,685,544)	(1,344,887)	1,487,497	523,359	(6,506,000)	(928,875)	(2,965,509)	18,056,534	5,200,531	656,380	18,992,000	23,589,092
BALANCE SHEET													
Cash and Equivalents	1,628,234	15,727,142	76,082,693	12,507,719	86,587,303	98,674,000	9,645,031	28,523,612	34,513,389	102,063,742	12,725,587	80,712,000	559,340,392
Fixed Assets	3,549,026	9,727,749	44,230,275	4,057,478	10,432,814	12,551,000	1,902,939	1,832,215	17,661,974	-	2,518,678	2,716,000	111,180,148
Other Current Assets	26,019,014	27,240,095	319,839,758	37,681,444	126,557,977	106,127,000	9,430,298	147,390	256,762,518	59,410,424	8,774,716	225,284,000	1,203,274,634
Total Assets	31,196,274	52,694,986	440,102,666	54,246,641	223,578,094	217,352,000	20,978,267	30,503,217	308,937,881	161,474,166	24,018,981	308,712,000	1,873,795,173
Insurance Liabilities	9,088,643	27,461,368	224,253,571	14,249,149	117,828,236	121,759,000	6,084,381	12,367	134,459,788	16,177,563	5,708,121	161,376,000	898,458,187
Long-term Liabilities	-	-	8,917,355	-	839,639	5,092,000	-	-	7,834,143	20,333	620,330	2,296,000	25,619,800
Other Current Liabilities	15,308,048	4,363,760	29,040,282	8,383,122	26,881,461	12,664,000	9,838,470	5,009,549	45,870,559	97,263,698	9,457,350	14,694,000	278,774,299
Total Liabilities	24,396,691	31,825,128	262,211,208	22,632,271	145,549,336	139,515,000	15,922,851	5,021,916	188,164,490	113,461,594	15,795,801	178,366,000	1,142,852,286
Share Capital	15,000,000	14,583,855	52,292,664	64,882,401	65,301,700	35,537,000	8,152,698	9,941,016	9,530,000	8,050,092	5,000,000	19,105,000	307,376,416
Reserves	1,767,968	8,241,243	103,748,602	3,373,810	12,180,963	29,058,000	518,383	10,843,703	95,267,119	6,027,441	1,368,228	44,023,000	316,418,460
Retained Earnings	(9,968,385)	(1,955,241)	21,850,202	(36,641,841)	546,095	13,242,000	(3,615,661)	4,696,582	15,976,272	33,935,039	1,864,952	67,218,000	107,148,014
Total Capital	6,799,583	20,869,857	177,891,458	31,614,370	78,028,758	77,837,000	5,055,420	25,481,301	120,773,391	48,012,572	8,233,180	130,346,000	730,942,890
Total Liabilities & Equity	31,196,274	52,694,985	440,102,666	54,246,641	223,578,094	217,352,000	20,978,267	30,503,217	308,937,881	161,474,166	24,018,981	308,712,000	1,873,795,172

Source: Audited financial statements and statutory returns from insurers

Appendix 3: 2017 Combined Short Term Reinsurers Financial Analysis

	CONTINENTAL-RE	EMERITUS	FMRE	TOTALS
PERIOD	31-Dec	31-Dec	31-Dec	*****
INCOME STATEMENT	(Pula)	(Pula)	(Pula)	(Pula)
Gross Premium Written	96,641,485	21,682,204	71,645,546	189,969,235
Premiums Ceded	25,361,421	8,905,009	23,084,263	57,350,693
Net Premiums Written	71,280,064	12,777,195	48,561,283	132,618,542
Change in UPR	-	(312,205)	2,707,706	2,395,501
Net Premiums Earned	71,280,064	13,089,400	45,853,577	130,223,041
Gross Incurred Claims	48,828,429	8,200,396	12,345,759	69,374,584
Less Reinsurance share of claims	-	4,931,891	(5,868,724)	(936,833)
Net claims	48,828,429	3,268,505	18,214,483	70,311,417
Gross Acquisition Costs	25,437,970	6,917,155	17,296,439	49,651,564
Less Reinsurance commission	-	-	6,086,131	6,086,131
Net acquisition costs	25,437,970	6,917,155	11,210,308	43,565,433
Operating Expenses	18,886,826	5,369,105	11,280,377	35,536,308
Underwriting Expenses	93,153,225	15,554,765	40,705,168	149,413,158
Total Underwriting Income	(21,873,161)	(2,465,365)	5,148,409	(19,190,117)
Investments Income	1,614,305	385,534	355,014	2,354,853
Other Income	(4,970,253)	3,279,344	-	(1,690,909)
Net Profit Before Taxes	(25,229,109)	1,199,513	5,503,423	(18,526,173)
Tax	(32,244)	285,767	1,191,119	1,444,642
Net Income After Tax	(25,196,865)	913,746	4,312,304	(19,970,815)
BALANCE SHEET				
Cash and Equivalents	38,919,180	15,343,224	42,938,777	97,201,181
Fixed Assets	1,644,352	261,795	1,918,825	3,824,972
Other Current Assets	91,871,002	13,659,502	47,637,795	153,168,299
Total Assets	132,434,534	29,264,521	92,495,397	254,194,452
Insurance Liabilities	71,780,765	16,910,802	43,032,597	131,724,164
Long-term Liabilities	233,170	-	102,273	335,443
Other Current Liabilities	10,417,286	12,771	15,030,446	25,460,503
Total Liabilities	82,431,221	16,923,573	58,165,316	157,520,110
Share Capital	65,450,569	5,000,001	22,932,490	93,383,060
Reserves	2,906,447	6,991,990	4,386,922	14,285,359
Retained Earnings	(18,353,703)	347,957	7,010,669	(10,995,077)
Total Capital	50,003,313	12,339,948	34,330,081	96,673,342
Total Liabilities & Equity	132,434,534	29,263,521	92,495,397	254,193,452

Appendix 4: List of Licensed and Exempted NBFIs by Industry

The following lists are available on the NBFIRA website under the respective industries (www.nbfira.org.bw)

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|--------------------------------------------------------------------------|----------------------------------------------------------------------|
| 4 A: List of insurance brokers | 4 K: Licensed Trustees for Collective Investment Undertakings |
| 4 B: List of Life, General and Reinsurances | 4 J: Botswana IFSC Accredited Companies |
| 4 C: Licensed Retirement Funds | 4 L: Exchange and Brokers |
| 4 D: Stand Alone Pension Funds | 4 M: List of Micro Lenders |
| 4 E: Sub-Funds Under Umbrella Funds | 4 N: List of Exempted Pawnshops |
| 4 F: Management Companies and Funds Licensed to Botswana | 4 O: List of Exempted Finance and Leasing Companies |
| 4 G: Externally Licensed Funds Approved for Marketing in Botswana | 4 P: Licensed Investment Advisors |
| 4 H: Registered Assets Managers | 4Q: List of Exempted Leasing Companies |
| 4 I: Investment Companies with Variable Capital | 4R: Medical Aid Players-Contact Details |

Appendix 4A: List of Insurance Brokers as at 2017

	NAME	CONTACT PERSON	CONTACT NO	CONTACT ADDRESSES
1	Alto Assurance Company (Pty) Ltd	Elliot Moshoke	3922146	P.O Box AD 30 ACG Gaborone
2	Absolute Insurance Brokers (Pty) Ltd	Prudent Katsidzira	3161243	P O Box V2094,Ramotswa
3	“Alexander Forbes Financial Services Botswana (Pty) Ltd”	Paul Masie	3651948	P/Bag 00410 Gaborone
4	Aon Botswana (Pty) Ltd	Barnabas Mavuma	3617300	PO Box 624 Gaborone
5	AT & T Insurance Brokers (Pty) Ltd	Segolame Lisenda	3938788	P. O. Box 60474 Gaborone
6	Babereki Insurance Brokers (Pty) Ltd	Sharla Egner	3922526	P. O. Box 1708 AAD Gaborone
7	“Blue Meadows (Pty) Ltd t/a Fides Insurance Brokers”	Carla M. Kokabi	74267311	P. O. Box 201 000 Bontleng Gaborone
8	“BOC Consulting (Pty) Ltd t/a BOC Insurance Brokers”	Barry John O’Connell	3959505	P.O. Box AB64 ABC Gaborone
9	Bofus Insurance Brokers (Pty) Ltd	Tlhopho Biggie Marungu	3105837	P.O Box 404341 Gaborone
10	“Bombshell Investments (Pty) Ltd t/a Flexi-Link Insurance Brokers”	Cosmas Nechiturike	3165262	PO Box AE 62 AEH Gaborone
11	CBAE (Pty) Ltd t/a Spectrum Insurance Brokers	Charles Tapiwa Kadenge	3500266	P/Bag BR 351 Suite 189 Gaborone
12	Complete Insurance Brokerfs (Pty) Ltd	Charles Modisenyane	3111705	PO Box 1030AAD Poso House
13	Complete Insurance Brokerfs (Pty) Ltd	Charles Modisenyane	3111705	PO Box 1030AAD Poso House
14	Coversure Insurance Brokers (Pty) Ltd	Aaron Jairos	2415986	PO BOX 11813, Francistown
15	Dokata Investments (Pty) Ltd t/a Coverlink Insurance Brokers	Thekiso Mothibi	3182471	P O BOX 211043 Gaborone
16	Dynamic Insurance Brokers (Pty) Ltd	Tapiwa Lawrence Mutangadura	3916490	P. O. Box 128, Gaborone
17	First Heritage (Pty) Ltd	Prosper Changamire	73779920	P O BOX 1973 ABG, Sebele Mall, Gaborone
18	First Sun Alliance (Pty) Ltd	Paul Shamiso Chitane	3913666	PO Box 404349Gaborone
19	FNB Insurance Brokers (Botswana) (Pty) Ltd	Kgomotso Mokokonyane	3706000	P.O Box 1552, Gaborone
20	Heritage Risk Services (Pty) Ltd	Tendai Nyakaswa	3105616	P O BOX AD296ADD Gaborone

Appendix 4A: List of Insurance Brokers as at 2017

NAME	CONTACT PERSON	CONTACT NO	CONTACT ADDRESSES
21 "Himalaya Investments (Pty) Ltd t/a Falcon Insurance Brokers"	Mr. Wonder Mhaka		P O Box 121 Gaborone
22 Hirsch Vic Insurance Brokers (Pty) Ltd	Victor Hirschfeldt	3951520	PO. Box 201491, Bontleng, Gaborone
23 "Huraya Holdings (Pty) Ltd t/a Apex Insurance Brokers"	Muyamwa Muyamwa	3102369	P O Box 1751 Gaborone
24 Insure Rite (Pty) Ltd	Ridwana Moorad	71391600	PO. Box 2452 Gaborone
25 Investment House (Pty) Ltd	Douglas Nkiwane	2413637	P O Box 500053 Francistown
26 Kalahari Insurance Brokers (Pty) Ltd	Jerome Byron	2413838	P.O. Box 24 Francistown
27 Kebonang Holings (Pty) Ltd t/a Lebone Insurance Brokers	Pierre-Yves Blasco	2410475	P.O. Box 30549 Francistown
28 Kgare Insurance Brokers (Pty) Ltd	Walter Matapuri	3930024	P O Box 404349 Gaborone
29 "Legal Expenses Insurance Botswana (Pty) Ltd t/a Leza Legalwise Botswana"	Etienne Malan	3951560	Private Bag 00489, Gaborone
30 Letsema Insurance Brokers (Pty) Ltd	Gobona Tobetsa	2673166176	PO Box 80045, Gaborone
31 "Luxiant Services (Pty) Ltd t/a Exclusive Insurance Solutions"	Thomas Moipolai	2673182030	P O Box 404268 Gaborone
32 Marsh (Pty) Ltd	Fritzgerald Dube	2673993100	Private Bag 103 Gaborone
33 "Matrix Risk Management Services (Pty) Ltd t/a Matrix Insurance Brokers"	Maxwell Meke	3919586	P. O. Box 3447 Gaborone
34 "Mercantile & General Insurance Brokers (Pty) Ltd"	Coram Mushuta	3919429	P.O. BOX 401297, Gaborone
35 "Mothotota Investments (Pty) Ltd t/a Key Insurance Solutions"	Mogomotsi France	"3980314/ 3980321"	P O Box 660 ABG Gaborone
36 Nnawalt Holdings (Pty) Ltd	Onward Chiteura	"3133742/ 3915729"	P O Box 602396 Gaborone
37 Pearson Hardman Insurance Brokers (Pty) Ltd	Segwara Serufho	3133827	P. O. Box 3751, Gaborone
38 Penrich Insurance Brokers (Pty) Ltd	Robert Holgate	2673973692	Private Bag X017, Gaborone
39 Quality Services (Pty) Ltd t/a Chartered Insurance Brokers	Kgomotso Ratlhaga	3924516	P O Box AD 828 ADD, Kgale View, Gaborone
40 "Royal shield (Pty) Ltd t/a Grace Short Term Insurance"	Boitumelo Rejoice	75009053	P O Box 123 Metsimothabe

Appendix 4A: List of Insurance Brokers as at 2017

	NAME	CONTACT PERSON	CONTACT NO	CONTACT ADDRESSES
41	“Rugged Cross Investments (Pty) Ltd t/a Rugged Cross Insurance Brokers”	Lenyalo Notice	3170089	P O Box 20992 Gaborone
42	Saley’s Agencies (Botswana) (Pty) Ltd t/a Saley’s Insurance Brokers	Yunus Yunus Mayet	3913804	P.O. Box 1317, Gaborone
43	Satib Africa (Botswana) (Pty) Ltd t/a Safari and Tourism Insurance Brokers	Seamus O’Neil	3170574	P.O. Box AB 129 ABC, Gaborone
44	Shangor Insurance Brokers Pty Ltd	Marvelous Shangare	3971244	P.O. Box 402716, Gaborone
45	Silverminds (Pty) Ltd	Tebatso Rasebokoana	72584764	P.O.Box 1899 ABGGaborone
46	Southsure Insurance Brokers (Pty) Ltd	Shadrack Moeti Molefhabangwe	72104067	PO Box AD 367 ADD, Gaborone
47	Strategic Wealth (Pty) Ltd	Nadine Davies	3916675	P O Box AD872 ADD, Postnet, Kgaleview, Gaborone
48	“Streamline Investments (Pty) Ltd t/a Federated Insurance Brokers”	Rodney Botau	3903982	P.O. Box 874, Postnet Kgale View, Gaborone
49	Super Insurance Brokers (Pty) Ltd	Alfred Fredie Otlukile	71763386	P.O. Box 201095, Bontleng, Gaborone
50	Tadzata Construction Company (Pty) Ltd t/a Botshabelo Insurance Brokers	Clever Mukombe	2406419	P.O. Box 10697, Tatitown, Francistown
51	The Intrepid Group (Pty) Ltd	Comfort Makubaro	3185846	P.O.Box AD37ADC Gaborone
52	Trilogy Insurance Brokers	Stanley Dalziel	3903321	P.O. Box 47605, Gaborone
53	Tsagae Promotions (Pty) Ltd	Kabalano Mojalemotho	3932399	P O BOX 201042, Gaborone
54	“U & Me Investments (Pty) Ltd t/a U & Me Insurance Brokers”	Danwell Kapitolo	3909546	Private Bag BR 165, Gaborone
55	Ultimate Care Insurance Brokers (Pty) Ltd	Maalila Malambo	3181308	P O Box 81169 Gaborone
56	VFS (Botswana) (Pty) Ltd	Noel Strugnell	6860891	P.O. Box 251 Maun
57	Wealth Cover Insurance (Pty) Ltd	Shakespear Kupemba	3928754	P. O. Box AD47ABE Gaborone

Appendix 4B: List of Life, Non-life and Re-insurers

LIST OF LIFE INSURERS AS AT 31 MARCH 2018			
ENTITY NAME	CONTACT PERSON	TELEPHONE	POSTAL ADDRESSES
1 Barclays Life Botswana (Pty) Ltd	Ratanang Tsayang	3625911	P O Box 45277, Gaborone
2 Bona Life Insurance (Pty) Ltd	Keaobaka Ramolemoge	3981800	Private Bag 001 ADD, Gaborone
3 Botswana Insurance Fund Management Limited	Neo Bogatsu	3951564	Private Bag BR 185
4 Botswana Life Insurance Limited	Patricia Raditholo	3645100	P/Bag 00296 Gaborone
5 Hollard Life Botswana (Pty) Ltd t/a Hollard Life Botswana	Odirile Metsi	3633000	Private Bag BR 203 Gaborone
6 Liberty (Botswana) (Pty) Ltd t/a Liberty Life Botswana	Leungo Rasebotsa	3910310	Private Bag 00168, Gaborone
7 Metropolitan Life of Botswana Limited	Boikobo Itshepeng	3624400	Private Bag 00231 Gaborone
8 Old Mutual Life Insurance Company (Botswana) (Pty) Ltd	Large Charumbira	3995700	P/Bag 00347 Gaborone

LIST OF NON-LIFE INSURERS AS AT 31 MARCH 2018			
ENTITY NAME	CONTACT PERSON	TELEPHONE	POSTAL ADDRESSES
1 Alpha Direct Insurance Company (Pty) Ltd	Khumo Phatshwane	3928264	Po Box 26 Adc, Gaborone
2 B.I.C.B Limited t/a Bryte Risk Services Botswana	Modipane Rakwadi	3188888	Po Box 1221, Gaborone
3 BHL Insurance Company Limited t/a Legal Guard	Chaha Skelemani	3634700	P O Box 405744
4 Botswana Insurance Company Limited	Newton Jazire	3600500	P.o. Box 715 Gaborone
5 Export Credit Insurance & Guarantee Company (Botswana) (Pty) Ltd	Rocky Ramalefo	3188015	Private Bag Bo 279 Gaborone
6 Liberty General (Botswana) (Pty) Ltd	Goitseone Molaodi	3180262	P. O. 601661 Gaborone
7 Old Mutual Short-Term Insurance Company Botswana Limited	Thebe Modikwa	3995700	Private Bag 00347, Gaborone
8 Phoenix of Botswana Assurance Company (Pty) Ltd	Carlson Chiswo	3161322	P O Box 361, Masa Centre, New Cbd, Gaborone
9 Sesiro Insurance Company (Pty) Ltd	Malebogo Gabonowe	3648838	P O Box 329 Gaborone
10 Sunshine Insurance Company of Botswana (Pty) Ltd	James Keobake	3105137	Private Bag Br15, Gaborone
11 The Hollard Insurance Company of Botswana (Pty) Ltd	Paul Beka	3958023	P O Box 45029, Gaborone

LIST OF REINSURERS AS AT 31 MARCH 2018			
ENTITY NAME	CONTACT PERSON	TELEPHONE	POSTAL ADDRESSES
1 Continental Re-Insurance Company Limited	Samuel Rimai	3974384	P.O.Box 698 ABG, Sebele, Gaborone,
2 First Reinsurance (Pty) Ltd	Mrs. Patience Marwiro	3121041/2	P.O. Box 404271 Gaborone
3 FMRE Property & Casualty (Pty) Ltd	Bongani M. Muhau	3934287	P.O. Box 47202 Gaborone

Appendix 4C: List of Retirement Funds

	NAME OF FUND	FISCAL YEAR	MEMBERS AS AT 31ST DEC 2016	MEMBERS AS AT 31ST	TOTAL ASSETS AS AT 31ST DEC 2017
1	Africa 53 Provident Fund	30th Sept.	457	421	60,407,015
2	Air Botswana Pension Fund	31st Mar.	357	355	107,303,640
3	Akani Botswana Retirement Fund	30th June	-	-**	-
4	Alexandra Forbes Beneficiary Fund	31st Mar.	-	-	-
5	Alexander Forbes Retirement Fund	30th June	23,621	30,235	1,135,830,081
6	Alexander Forbes Individual Member Retirement Fund	30th Sept	454	454*	63,852,972
7	AON Botswana Staff Pension Fund	31st Dec.	170	170	64,829,393
8	AON Preservation PF	31st Dec.	1,732	4,176*	313,570,124
9	Apostolic Faith Mission Pension Fund	31st Mar.	42	49	7,504,433
10	Apex Pension Fund	30th June	38	38*	25,943,155
11	Bank of Botswana Defined Contribution Fund	30th Sept.	707	724	812,227,442
12	Barclays Bank of Botswana Ltd. Staff Pension Fund	31st Dec.	2089	2,091	705,544,556
13	Barloworld Botswana Retirement Fund	30th Sept.	913	913*	182,734,613
14	BCL Staff Pension Fund	31st Mar.	4,301	4,301*	233,911,523
15	BDO Spencer Staff Pension Fund	30th June	36	48	6,924,990
16	BOCODOL Staff Pension Fund	31st Mar	165	158	63,753,225
17	Bolux Pension Fund	31st Jan.	28	26	13,838,298
18	Botswana Agricultural Marketing Board Pension Fund	31st Mar.	177	216	19,046,244
19	Botswana Ash Staff Pension Fund	31st Mar	654	654	140,372,164
20	Botswana Building Society Defined Contribution Pension Fund	31st Mar.	253	262	84,839,806
21	Botswana Bureau of Standards Staff Pension Fund	31st Mar.	140	145	73,836,026
22	Botswana College of Agriculture Pension Fund	31st Mar.	390	390*	261,964,187

Appendix 4C: List of Retirement Funds

NAME OF FUND	FISCAL YEAR	MEMBERS AS AT 31ST DEC 2016	MEMBERS AS AT 31ST	TOTAL ASSETS AS AT 31ST DEC 2017
21 Botswana Development Corporation Pension Fund	30th June	39	44	29,041,065
22 Botswana Examinations Council Pension Fund	31st Mar	192	191	60,059,295
23 Botswana Housing Corporation Pension Fund	31st Mar.	445	410	130,511,726
24 Botswana Insurance Company limited Pension Fund	31st Mar.	68	68*	20,629,360
25 Botswana Insurance Holding Ltd Pension Fund	31st Dec.	399	399*	110,261,816
26 Botswana Meat Commission Pension Fund	30th Sept.	672	672*	123,694,045
27 Botswana Medical Aid Society Pension Fund	31st Dec.	79	79*	36,378,782
28 Botswana Post Pension Fund	31st Mar.	616	616*	60,063,060
29 Botswana Power Corporation Staff Pension Fund	31st Mar.	1,998	1,969	752,797,787
30 Botswana Public Officers Pension Fund	31st Mar.	154,266	165,973	58,520,760,284
31 Botswana Railways Staff Pension Fund	31st Mar.	810	810*	346,550,393
32 Botswana Savings Bank Pension Fund	31st Mar.	136	146	34,571,718
33 Botswana Telecommunication Authority Pension Fund(BOCRA)	31st Mar.	76	80	38,376,389
34 Botswana Telecommunications Corporation Staff Pension Fund	31st Mar.	1,454	1,454	466,185,232
35 Botswana Unified Revenue Service Employees Pension Fund	31st Mar.	1922	1,911	530,894,070
36 Botswana International University of Science and Technology Staff Pension Fund	31st Mar.	224	224	31,635,909
37 Botswana Vaccine Institute Pension Fund	31st Mar.	89	89	44,832,555
38 Caltex Botswana Pension Fund/ Chevron Pension Fund	31st Dec.	21	21*	5,961,526
39 Citizen Entrepreneurial Development Agency Staff Pension Fund	31st Mar.	242	251	74,054,989
40 Civil Aviation of Botswana Pension Fund	31st Mar	865	913	105,796,631
41 Debswana Pension Fund	31st Dec.	11,646	12,066	7,048,070,026
42 Deferred Pensioners Pension Fund	31st Mar.	4,591	4,591	574,687,502
43 Deloitte and Touché Staff Pension Fund	31st Dec.	78	91	18,035,013
44 Engen Botswana Retirement Fund	30th Oct.	42	42	16,800,275
45 Ernst & Young Pension Fund	30th June	38	36	8,578,550
46 Fedics Botswana Pension Fund	31st Oct.	5	-	-
47 Fiducia Preservation Retirement Fund	31st Dec.	-	-	-
48 Fiducia Umbrella Pension Fund	30th June	-	-	-

Appendix 4C: List of Retirement Funds

NAME OF FUND	FISCAL YEAR	MEMBERS AS AT 31ST DEC 2016	MEMBERS AS AT 31ST	TOTAL ASSETS AS AT 31ST DEC 2017
49 Fincraft Retirement Fund	31st Mar.	66	67	3,298,594
50 First National Bank of Botswana Pension Fund	31st Dec.	1,713	1,801	333,881,722
51 Free Standing Additional Voluntary Contributions Retirement Fund	30th June	132	132*	35,716,247
52				
53 FSN Retirement Plan	31st Mar.	173	173	40,013,815
54 G4S Staff Pension Fund	30th June	1,435	1,431	28,444,981
55 Glenrand MIB Botswana Pension Fund	30th June	24	24	7,673,493
56 Glenrand MIB Orphans Fund	30th June	367	381	21,846,165
57 Hollard Insurance Botswana Pension Fund	30th June	54	55	11,530,925
58 Institute of Development Management Pension Fund	30th Sept.	55	58	8,477,356
59 J. Haskins & Sons Pension Fund	30th June	34	34	18,344,432
60 Kgalagadi Breweries Limited Pension Fund	30th Sept.	1,456	1,439	181,549,016
61 Lenmed Bokamoso Private Hospital Staff Pension Fund	31st Dec	359	359*	13,984,350
62 Lenmed Provident Fund	31st Dec	88	88*	8,721,471
63 Local Enterprise Authority Pension Fund	31st Dec.	460	460*	85,683,878
64 Alexandra Forbes Beneficiary Fund	31st Mar.	-	-	-
65 Majwe Mining Provident Fund	31st Dec	201	201*	27,154,137
66 Maru-a-pula School Staff Provident Fund	31st Dec.	64	64*	8,096,406
67 Mascom Wireless Staff Pension Fund	31st Aug.	472	480	160,047,021
68 Metropolitan Staff Pension Fund	31st Mar.	258	182	14,932,123
69 Metropolitan Staff Provident Fund	31st Mar.	258	157	20,952,389
70 Millennium Retirement Fund	30th Aug	3,015	3015*	346,651,853
71 Motor Vehicle Accident Pension Fund	31st Aug.	89	89	30,693,028
72 National Development Bank Staff Pension Fund	31st Mar.	239	239	71,527,921
73 National Food & Technology Research Centre	31st Oct.	47	47	22,827,587
74 Orange Botswana Pension Fund	31st Dec.	283	290	55,888,991
75 Puma Energy Staff Pension Fund	31st Dec.	88	88	48,408,425
76 Scales and Associates Pension Fund	31st Mar	16	16	3,191,319
77 Sentlhaga Pension Fund	30th June	1,033	2,354	215,100,493

Appendix 4C: List of Retirement Funds

NAME OF FUND	FISCAL YEAR	MEMBERS AS AT 31ST DEC 2016	MEMBERS AS AT 31ST	TOTAL ASSETS AS AT 31ST DEC 2017
78 Sefalana Group Staff Pension Fund	30th Sept.	3432	4,114	261,149,346
79 Shell Oil Botswana Pension Fund	31st Dec.	81	75	61,161,051
80 Stanbic Bank Botswana Pension Fund	31st Dec.	932	1,050	240,465,509
81 Standard Chartered Bank Botswana Pension Fund	31st Dec.	1276	1,302	318,611,249
82 Tosas Botswana Staff Pension Fund	30th June	8	8	1,746,424
83 Total Botswana Pension Fund	31st Dec.	15	12	5,863,143
84 University of Botswana Defined Contribution Staff Pension Fund	31st Mar.	1,829	1,897	1,900,647,463
85 Water Utilities Corporation Staff Pension Fund	31st Mar.	3,035	3,031	682,147,639

Appendix 4D: List of Standalone Pension Funds

FUNDS NAME	FINANCIAL YEAR END	PHYSICAL ADDRESS	POSTAL ADDRESS	TELEPHONE	CONTACT PERSON
Africa 53 Provident Fund	30-Sep	Plot 203 Independence Avenue, Gaborone	Private Bag 00410, Gaborone, Botswana	3651901/48	Mr Paul Masie
Air Botswana Pension Fund	31-Mar	Air Botswana Head Office, Sir Seretse Khama Airport	P O Box 92, Gaborone, Botswana	3952812/ 3688400	Ms Leditkwa Mosadame
Alexander Forbes Beneficiary Fund	31-Mar	Plot 203 Independence Avenue, Gaborone	Private Bag 00410, Gaborone, Botswana	3651901	Mr Paul Masie
Alexander Forbes Individual Member Retirement Fund	30-Sep	Plot 203 Independence Avenue, Gaborone	Private Bag 00410, Gaborone, Botswana	3651901	Mr Paul Masie
Alexander Forbes Retirement Fund	30-Jun	Plot 203 Independence Avenue, Gaborone	Private Bag 00410, Gaborone, Botswana	3651901/48	Mrs Nina Sephuma
Aon Defined Contribution	31-Dec	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Peter Hikhwa
Aon Preservation Fund	30-Sep	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Peter Hikhwa
Apex Pension Fund	30-Jun	New Lobatse Road, 14400/1, Gaborone 1751, Botswana	P O Box 1751 Gaborone, Botswana	3617300	Mrs T Mookodi
Apostolic Faith Mission	31-Mar	C/O AON Botswana ,Plot 203 Independence Avenue, Gaborone	P O Box 1886, Gaborone, Botswana	3959811/ 3904784	Pastor Johannes Kgwarapi
Bank of Botswana Defined Contribution Staff Pension Fund	30-Sep	Plot 17938, Khama Crescent, Gaborone	Private Bag 154, Gaborone, Botswana	3606000	Mr Daniel Loeto
Barclays Bank of Botswana Limited Pension Fund	31-Dec	Barclays Bank of Botswana, 6th Floor Barclays House, Khama Crescent, Gaborone	P O Box 478, Gaborone, Botswana	363 3951	Ms Wilheminah Ditiwa
Barlworld Botswana Retirement Fund	30-Sep	Plot 50368, Gaborone Business Park, Showgrounds, Gaborone	P O Box 1616, Gaborone, Botswana	3973917	Mr Peter Stevenson
BCL Staff Pension Fund	31-Mar	KPMG Chartered Accountants	P.O. Box 1519 Gaborone Botswana	3912400	Ms. Natasha Mulenga
BDO Spencer Staff Pension Fund	30-Jun	BDO House, 28 Kgale Mews, Gaborone International, Finance Park	P O Box 1839, Gaborone, Botswana	390 2779	Mr Chris Bray
BOCODOL Staff Pension Fund	31-Mar	Plot 39972 cnr Western-Bypass	Private Bag Bo 187, Bonitleng, Gaborone, Botswana	3181470/ 3646000	Mr Mokeresete Boima
Bolux Group Pension Fund	31-Jan	Plot 127/8 Ramotswa Station Industrial Site	Private Bag X01, Ramotswa, Botswana	5390275	Ms Portia Chipalaza-Tobedza
Boswe Construction Pension Fund	31-Mar	C/O AON Botswana ,3rd Fl Block A, Fairgrounds Office park, Gaborone	P O Box 624, Gaborone, Botswana	3617300	Mr Lemogelang Ebineng

Appendix 4D: List of Standalone Pension Funds

FUNDS NAME	FINANCIAL YEAR END	PHYSICAL ADDRESS	POSTAL ADDRESS	TELEPHONE	CONTACT PERSON
Botswana Agricultural Marketing Board Pension Fund	31-Mar	Plot 130 Unit 3&4, Nkwe Square, GIFF, Gaborone	Private Bag 0053, Gaborone, Botswana	3951341	Mr Elvis Ncaagae
Botswana Ash Limited Staff Pension Fund	31-Mar	Botswana Ash (Pty) Ltd, Private Bag SOW 7. Sowa Town, Botswana	Private Bag SOW 7. Sowa Town, Botswana	621 4243	Ms Tuduetso Rampart
Botswana Building Society Defined Contribution Pension Fund	31-Mar	BBS Computer Center Plot 54347 Central Business District	P O Box 40029 Gaborone Botswana	3164253	Mr Isaac Ifheetseng
Botswana Bureau of Standards Staff Pension Fund	31-Mar	Plot 55745, Block 8, Main Airport rd, Gaborone	Private Bag BO 48, Bontleng, Gaborone, Botswana	3971396	Mr Mokwadi Moitoi
Botswana College of Agriculture Pension Fund	31-Mar	Botswana College of Agriculture, Content Farm, Sebele, Gaborone, Botswana	Private Bag 0027, Gaborone, Botswana	3651300	Mr Ditshoke L Monametsi
Botswana Development Cooperation Contributory Staff Pension Fund	30-Jun	Plot 50380 Moedi House, Fairgrounds, Gaborone, Botswana	Private Bag 160, Gaborone, Botswana	3651300	Ms Boipelo Gaeetswe
Botswana Examinations Council Pension Fund	31-Mar	Plot 54682 K. T. Motsete Road, Gaborone	Private Bag 0070, Gaborone, Botswana	3650700	Mr Letlhokwa Galekhutle
Botswana Housing Corporation Staff Pension Fund	31-Mar	Botswana Housing Corporation Head Office Cnr Mmaraka & Station Road Gaborone	P O Box 412, Gaborone, Botswana	360 5220	Mr Sekgele Ramahobo
Botswana Insurance Company limited Pension Fund	31-Mar	Plot 50372, BIC House, Gaborone Showgrounds	P O Box 715, Gaborone, Botswana	3600500	Mr Kago Kimane
Botswana Insurance Holding Ltd Pension Fund	31-Dec	Plot 50676, Fairgrounds Office Park, Gaborone	Private Bag 00296, Gaborone, Botswana	3645100	Mr Haig Ndzinge
Botswana International University of Science And Technology	31-Mar	BIUST Campus Palapye	Private Bag 16 Palapye	4900117	Ms Gaafele Mochobo
Botswana Meat Commission Pension Fund	30-Sep	Plot 621, Khama 1 Avenue, Lobatse	P O Box 624, Gaborone, Botswana	5430000	Mr. Billy Mauco
Botswana Medical Aid Society Pension Fund	30-Sep	Plot 50638, Fairgrounds, Gaborone	P O Box 632, Gaborone, Botswana	3184210/ 3633100	Mrs. Goitsewang Rampa
Botswana Postal Services Pension Fund	31-Mar	Poso House Khama Crescent, Gaborone, Botswana	P O Box 100, Gaborone, Botswana	3953131	Ms Thato Pone
Botswana Power Corporation Staff Pension Fund	31-Mar	Motlakase House, Macheng Way	P O Box 48, Gaborone, Botswana	3607011	Mr. Matong Danny Matong
Botswana Public Officers Pension Fund	31-Mar	Plot 203, Independence Avenue, Gaborone	Private Bag 00195, Gaborone, Botswana	3617000	Ms Boitumelo Molefe

Appendix 4D: List of Standalone Pension Funds

FUNDS NAME	FINANCIAL YEAR END	PHYSICAL ADDRESS	POSTAL ADDRESS	TELEPHONE	CONTACT PERSON
Botswana Railways Staff Pension Fund	31-Mar	Along A1, Mahalapye Main Road	Private Bag 0052, Mahalapye Botswana	4711375	Ms Julia Thekiso
Botswana Savings Bank Pension Fund	31-Mar	Tshomarelo House, Plot 53796, Corner Lekgarapa/Letswai rd	P O Box 1150, Gaborone, Botswana	3670079/ 72110536	Mr Moremedi Modise
Botswana Telecommunication Authority Pension Fund	31-Mar	Plot 206/7 Independence Ave, Gaborone	Private Bag 00495, Gaborone, Botswana	3957755	Mrs Kebareileng Seane
Botswana Telecommunications Corporation Limited	31-Mar	BTC Limited Megaleng House Khama Crescent Gaborone	P O Box 700 Gaborone, Botswana	3958000	Mrs Naledi Mabena
Botswana Unified Revenue Service Employees Pension Fund	31-Mar	Plot 53976 Kudumatse Road, Gaborone	Private Bag 0013, Gaborone, Botswana	3638000	Ms. Grace Siamisang.
Botswana Vaccine Institute Pension Fund	31-Mar	Plot 638590, Lejara rd B/hursti, Gaborone	Private Bag 0031, Gaborone, Botswana	3912711	Mr Mophuting Gaonakgang
Caltex Botswana Pension Fund/ Chevron Pension Fund	31-Dec	Plot 1220, Industrial Site, Nkurumah rd, Gaborone	P O Box 47, Gaborone, Botswana	3914777/ 3617300	Ms Lucrecia Masupe
Citizen Entrepreneurial Development Agency Staff Pension Fund	31-Mar	Plot 50368, Gaborone Business Park, Showgrounds, Gaborone	P/Bag 00504, Gaborone, Botswana	3170895/ 3617300	Mr Tiroyamodimo Kayawe
Civil Aviation Authority of Botswana	31-Mar	Plot 61920 Letsena Office Park, Fairgrounds Gaborone	P O Box 250, Gaborone, Botswana	3688283	Ms Boitumelo Kgame
Debswana Pension Fund	31-Dec	Plot 50361, Block D, Carlton House, Fairgrounds	Private Bag 00512 Gaborone, Botswana	3614267	Ms Gosego January
Deferred Pensioners Pension Fund	31-Mar	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Lemogelang Ebineng
Deloitte and Touché Staff Pension Fund	31-Dec	Deloitte Office, Fairgrounds., Gaborone, Botswana	P O Box 778, Gaborone, Botswana	395 1611	Mr Max Marinelli
Engen Botswana Retirement Fund	31-Oct	Plot 54026, Western Bypass, Gaborone	P O Box 867, Gaborone, Botswana	3635300	Ms Francinah Tswai
Ernst & Young Pension Fund	30-Jun	Plot 22 Khama Crescent, 2nd floor	P O Box 41015, Gaborone, Botswana	3654000	Mr Bakani Ndwapi
Fedics Botswana Pension Fund	31-Oct	C/O AON Botswana, Plot 203 Independence Avenue, Gaborone	P O Box 624, Gaborone, Botswana	3617300	Mr Lemogelang Ebineng
Fiducia Preservation Retirement Fund	30-Sep	Plot 125, Unit 11, Gaborone International Finance Park	P O Box 70409, Gaborone Botswana	3190898	Mr Abisha Ndoro

Appendix 4D: List of Standalone Pension Funds

FUNDS NAME	FINANCIAL YEAR END	PHYSICAL ADDRESS	POSTAL ADDRESS	TELEPHONE	CONTACT PERSON
Fiducia Umbrella Provident Fund	30-Sep	Plot 125, Unit 11, Gaborone International Finance Park	P O Box 70409, Gaborone Botswana	3190898	Mr Lemogang Masuku
Fiducia Umbrella Retirement Fund	30-Jun	Plot 125, Unit 11, Gaborone International Finance Park	P O Box 70409, Gaborone Botswana	3190898	Mr Abisha Ndoro
Fincraft Retirement Fund	31-Dec	Unit 12, Lot 125, Kgale Terrace, Gaborone International Finance Park, Gaborone	Private Bag Bo665, Botleng, Gaborone, Botswana	3901106/9	Ms. Oarabile Tshimologo.
First National Bank Botswana Pension Fund	31-Dec	First National Bank Botswana Central Business District First Place, Plot 54362, Gaborone	P O Box 1552, Gaborone, Botswana	370 6022	Mr. Tefo Mmopi
Free Standing Additional Voluntary Contributions Retirement Fund	30-Jun	3rd Fl Block A, Fairgrounds Office park, Gaborone	Private Bag Br 284, Gaborone, Botswana	3181870/ 3603000	Mr Lemogelang Ebineng
FSN Retirement Plan	31-Mar	American Embassy, Gaborone	P O Box 90, Gaborone, Botswana	3953982	Ms Lesego Seema
G4S (Botswana) Limited Pension Fund	30-Jun	G4S (Botswana) Limited, Plot 20584, Western Bypass, Gaborone	P O Box 1488, Gaborone, Botswana	369 8000	Mr Thabani Balang
Glenrand MIB Botswana Pension Fund	30-Jun	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Lemogelang Ebineng
Glenrand MIB Orphans Fund	30-Jun	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Lemogelang Ebineng
Hollard Insurance Botswana Pension Fund	30-Jun	Plot 50676, Fairgrounds Office Park, Block D, Gaborone	P O Box 45029, Gaborone, Botswana	3958023	Mr Tebogo Ramsden
Institute of Development Management Pension Fund	30-Sep	Babuto & Tlokwenng rd Circle, Gaborone	P O Box 1357, Gaborone, Botswana	3612100	Mr. Siphho Mbebe
J. Haskins & Sons Pension Fund	30-Jun	Sam Nujoma dr, Light Industrial Site	P O Box 1, Francistown, Botswana	3914911	Mr George Haskins
Kgalagadi Breweries Limited Pension Fund	30-Sep	Kgalagadi Breweries Corner Kubu/Mandela Drive Broadhurst Industrial Gaborone	P O Box 706, Gaborone, Botswana	3634124	Mr Edward Mokgadi
Lenmed Bokamoso Private Hospital Pension & Provident Fund	30-Sep	3rd Fl Block A, Fairgrounds Office park, Gaborone	Private Bag 00205, Gaborone, Botswana	3694122	Mr Bernard Moalusiw
Local Enterprise Authority Pension Fund	31-Dec	Local Enterprise Authority 2nd Floor Plot 50676 Block A Fairgrounds Office Park Gaborone	Private Bag 191, Gaborone, Botswana	3644000	Mr Bitsang Kgosi
Majwana Umbrella Fund	31-Mar	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Lemogelang Ebineng
Majwe Mining Pension Fund	31-Dec	Plot 503, Jwaneng Industrial Site, Jwaneng Botswana	Private Bag 0012	580 4300	Ms Sesolo Robert

Appendix 4D: List of Standalone Pension Funds

FUNDS NAME	FINANCIAL YEAR END	PHYSICAL ADDRESS	POSTAL ADDRESS	TELEPHONE	CONTACT PERSON
Marsh Pension Fund	31-Dec	Gaborone Business Park, Showgrounds, Plot 50362	Private Bag 103, Gaborone, Botswana	3188000	Mr Fitzgerald Dube
Maru-a-pula School Staff Provident Fund	31-Dec	Plot 4725, Maruapula Way	Private Bag 0045, Gaborone, Botswana	391 2953	Mr Dominic Mutso
Mascom Wireless Staff Pension Fund	31-Aug	Mascom Wireless, Tsholetsa House, Plot 4705/6, Botswana Road Main Mall	Private Bag B0298 Bontleng, Gaborone	3903396	Mr Gape Sebonego
Metropolitan Staff Pension Fund	31-Mar	Head Office, Standard House Main Mall, Gaborone	Private Bag Bo 235, Gaborone, Botswana	3624400/ 3624451	Ms Choice Pitso
Metropolitan Staff Provident Fund	31-Mar	Head Office, Standard House Main Mall, Gaborone	Private Bag Bo 235, Gaborone, Botswana	3624400/ 3624451	Ms Choice Pitso
Millennium Retirement Fund	31-Aug	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Lemogelang Ebineng
Motor Vehicle Accident Pension Fund	31-Aug	Plot 50367, 3rd Fir MVA House, Fairground Office Park, Gaborone	Private Bag 00438, Gaborone, Botswana	3188533/ 3600100	Mrs Onthatile Tiny Ogoiseng
National Development Bank Staff Pension Fund	31-Mar	Plot 1123 Queens rd, Development House The Mall, Gaborone	P O Box 225, Gaborone, Botswana	3952801	Mrs T Madeswi
National Food Technology Research Centre (NFTRC) Pension Fund	31-Oct	Plot 1840 Lobatse Road	Private Bag 008, Kanye, Botswana	5445500	Mr Mompoti Ditaolana
Orange Botswana Pension Fund	31-Dec	Plot 166, Cnr Queen rd & Pilane rd, Gaborone	Private Bag BO 64, Gaborone, Botswana	3693700/800	Mr Mooketsi Maphane
Puma Energy Staff Pension Fund	31-Dec	Plot 682/3 Botswana rd, Main Mall, Gaborone	P O Box 183, Gaborone, Botswana	3951077	Ms Pearl Nnyenyiwa
Scales and Associates Pension Fund	31-Mar	Plot 20688, Sekotlo Rd, Broadhurst Ind Est, Gaborone, Botswana	P O Box 401907, Gaborone, Botswana	397 3386/ 395 3609	Mr Vaughan Strugnell
Sefalana Group Staff Pension Fund	30-Sep	Plot 20608/9 Off Western By Pass, Broadhurst Ind, Gaborone, Botswana	Private Bag 0075, Gaborone, Botswana	397 3866	Mr Mohamed Osman
Sentlhaaga Pension Fund	30-Jun	Plot 50368, Gaborone Business Park, Showgrounds	P O Box 624, Gaborone, Botswana	3617300	Mr Peter Hikhwa
Shell Oil Botswana Pension Fund/VVO Energy Pension Fund	31-Dec	Plot 50369, Shell House, Fairgrounds Office Park, Gaborone	P O Box 334, Gaborone, Botswana	3953025/ 3951691	Ms Gertrude Muzola
Stanbic Bank Botswana Pension Fund	31-Dec	Stanbic Botswana, Stanbic House, Plot 50672, Off Machel Drive, Fairgrounds	Private Bag 00168, Gaborone, Botswana	3618274	Mrs Chedza Balopi

Appendix 4D: List of Standalone Pension Funds

FUNDS NAME	FINANCIAL YEAR END	PHYSICAL ADDRESS	POSTAL ADDRESS	TELEPHONE	CONTACT PERSON
Standard Chartered Bank Botswana Pension Fund	31-Dec	Standard House, The Mall Gaborone	P O Box 496, Gaborone, Botswana	3601628	Ms. Shirley Pine
Tosas Botswana Staff Pension Fund	30-Jun	Plot 21312, Phakalane, Gaborone	Private Bag 00409, Gaborone, Botswana	3914957	Ms Margery Qobo
Total Botswana Pension Fund	31-Dec	Plot 22010 Kgomokasitwa Road	P O Box 624, Gaborone, Botswana	3956673	Mr Kabo Semausu
University of Botswana Defined Contribution Staff Pension Fund	31-Mar	Corner of Mabutho & Notwane	Private Bag 0022, Gaborone, Botswana	3552031	Mr. Lopang Mosupi.
Water Utilities Corporation Staff Pension Fund	31-Mar	Sedibeng House, Plot 17530 Luthuli rd, Gaborone	Private Bag 00276, Gaborone, Botswana	3604400	Mrs Taboka Muke

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
1	ABM University	Millennium Botswana Retirement Fund
2	BOCCIM	Sentlhaga Pension Fund
3	SMC BRANDS	Sentlhaga Pension Fund
4	CLOVER	Millennium Botswana Retirement Fund
5	MR PRICE	Sentlhaga Pension Fund
6	INVESTEC	Africa 53 Provident Fund
7	GABORONE SUN	Millennium Botswana Retirement Fund
8	GLOBAL HOLDINGS	Millennium Botswana Retirement Fund
9	PPADB	Millennium Botswana Retirement Fund
10	ACKERMANS	Millennium Botswana Retirement Fund
11	PEP	Sentlhaga Pension Fund
12	PEP	Millennium Botswana Retirement Fund
13	SANDVIK	Africa 53 Provident Fund
14	MULTICHOICE	Africa 53 Provident Fund
15	SKIP HIRE	Sentlhaga Pension Fund
16	EDCON-JET & EDGARS	Millennium Botswana Retirement Fund
17	COLLINS	Sentlhaga Pension Fund
18	UCCSA	Africa 53 Provident Fund
19	ALLAN GRAY	Millennium Botswana Retirement Fund
20	BOPEU	Africa 53 Provident Fund
21	BPOPF SECRETARIAT	Millennium Botswana Retirement Fund
22	AFFS	Millennium Botswana Retirement Fund
23	SEABELO'S EXPRESS	Africa 53 Provident Fund
24	LETSHEGO HOLDINGS LTD	Africa 53 Provident Fund
25	YARONA FM	Africa 53 Provident Fund
26	PCI	Millennium Botswana Retirement Fund
27	PRIMEDIA	Sentlhaga Pension Fund
28	SCANIA	Africa 53 Provident Fund
29	BAMALETE	Africa 53 Provident Fund
30	NTS PICK & PAY	Millennium Botswana Retirement Fund
31	ORTHOSURGE	Africa 53 Provident Fund
32	KINGDOM BANK	Millennium Botswana Retirement Fund
33	GABORONE CONTAINER TERMINAL	Sentlhaga Pension Fund
34	ST. JOSEPH	Millennium Botswana Retirement Fund
35	MAGNUM FREIGHT	Africa 53 Provident Fund
36	UPT	Africa 53 Provident Fund
37	CHOPPIES	Millennium Botswana Retirement Fund
38	CHESHIRE	Sentlhaga Pension Fund

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
39	GPH	Sentlhaga Pension Fund
40	EUROSTAR	Sentlhaga Pension Fund
41	LEO SCHACHTER	Millennium Botswana Retirement Fund
42	TIME PROJECTS	Africa 53 Provident Fund
43	TIME PROJECTS	Millennium Botswana Retirement Fund
44	ABSA LIFE	Sentlhaga Pension Fund
45	JOHNSON CRANE HIRE	Millennium Botswana Retirement Fund
46	JOHNSON CRANE HIRE	Sentlhaga Pension Fund
47	MASS MART	Africa 53 Provident Fund
48	AIR LIQUIDE	Africa 53 Provident Fund
49	HORN OF AFRICA	Millennium Botswana Retirement Fund
50	ATLAS COPCO	Millennium Botswana Retirement Fund
51	LAS	Millennium Botswana Retirement Fund
52	MG PROPERTIES	Africa 53 Provident Fund
53	KUDU COMMUNICATIONS	Millennium Botswana Retirement Fund
54	SEKOLO SA ANNE-STINNE	Sentlhaga Pension Fund
55	TYRES SERVICES	Africa 53 Provident Fund
56	OTRACO BOTSWANA	Sentlhaga Pension Fund
57	AFRISURE	Sentlhaga Pension Fund
58	BNPC	Sentlhaga Pension Fund
59	HAIR SOLUTIONS	Sentlhaga Pension Fund
60	MARSH	Millennium Botswana Retirement Fund
61	UNITRANS	Sentlhaga Pension Fund
62	ACE GIBB	Millennium Botswana Retirement Fund
63	BIDVEST	Sentlhaga Pension Fund
64	BOGOPA, MANEWE & TOBEDZA	Africa 53 Provident Fund
65	ERB	Millennium Botswana Retirement Fund
66	JOY GLOBAL	Millennium Botswana Retirement Fund
67	MULTOTEC	Sentlhaga Pension Fund
68	STEFANNUTTI	Sentlhaga Pension Fund
69	NBL BOTSWANA	Millennium Botswana Retirement Fund
70	ERICSSON BOTSWANA	Sentlhaga Pension Fund
71	DYNAMIC ROAD SERVICES	Sentlhaga Pension Fund
72	HORIZON OGILVY & MATHER	Africa 53 Provident Fund
73	WILDERNESS SAFARIS	Africa 53 Provident Fund
74	CAN MANUFACTURERS	Millennium Botswana Retirement Fund
75	BOBONONG MULTIPURPOSE CORP	Millennium Botswana Retirement Fund
76	WEEKEND POST	Millennium Botswana Retirement Fund

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
77	MEDPLUS	Africa 53 Provident Fund
78	RIVERSIDE HOSPITAL	Africa 53 Provident Fund
79	AFROX (PTY) LTD	Sentlhaga Pension Fund
80	CONTINENTAL REINSURANCE	Millennium Botswana Retirement Fund
81	PST SALES & DISTRIBUTION	Sentlhaga Pension Fund
82	VEOLIA WATER TECHNOLOGIES BOTSWANA	Millennium Botswana Retirement Fund
83	KANYE SDA COLLEGE OF NURSING	Millennium Botswana Retirement Fund
84	FUTURE SUSTAIN INTERNATIONAL (FSI)	Millennium Botswana Retirement Fund
85	NGAMILAND ADVENTURE SAFARIS	Millennium Botswana Retirement Fund
86	PREFSURE	Sentlhaga Pension Fund
87	PREFSURE	Africa 53 Provident Fund
88	NAMPAK DIVFOOD	Africa 53 Provident Fund
89	MEDLANE HEALTHCARE	Millennium Botswana Retirement Fund
90	FRANKILN COVEY	Sentlhaga Pension Fund
91	FRANKILN COVEY	Sentlhaga Pension Fund
92	BONA LIFE PENSION PLAN FUND	Millennium Botswana Retirement Fund
93	EXCLUSIVE INSURANCE SOLUTIONS	Africa 53 Provident Fund
94	EXPRESS CREDIT	Africa 53 Provident Fund
95	GIZ	Sentlhaga Pension Fund
96	Prehold Botswana	Millennium Botswana Retirement Fund
97	Pricewaterhouse Coopers	Millennium Botswana Retirement Fund
98	Regent Insurance Botswana (Pty) Ltd	Sentlhaga Pension Fund
99	Rural Industries Promotions Company Botswana	Africa 53 Provident Fund
100	Securicor Botswana (Pty) Ltd	Sentlhaga Pension Fund
101	Stobech Facilities Management	Sentlhaga Pension Fund
102	Tak Investments (Pty) Ltd	Sentlhaga Pension Fund
103	Teemane Pension Fund	Majwana Umbrella Fund
104	Transunion ITC	Millennium Botswana Retirement Fund
105	University of Botswana	Africa 53 Provident Fund
106	University Research	Africa 53 Provident Fund
107	William Lee Associates	Millennium Botswana Retirement Fund
108	Zimbabwe Embassy	Africa 53 Provident Fund
109	Zismo Engineering	Africa 53 Provident Fund
110	Botgood Investments Provident Fund	Africa 53 Provident Fund
111	C.E.B Maintenance Staff Pension Fund	Africa 53 Provident Fund
112	Genesis Orthodontics Staff Pension Fund	Millennium Botswana Retirement Fund
113	Lerala Diamonds Mine	Millennium Botswana Retirement Fund
114	More Power Investments Staff Pension Fund	Millennium Botswana Retirement Fund

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
115	Thito Holdings Staff Pension Fund	Millennium Botswana Retirement Fund
116	Metropolitan Life Botswana Pension Fund	Millennium Botswana Retirement Fund
117	JD GROUP	Alexander forbes Retirement Fund
118	BOCCIM	Alexander forbes Retirement Fund
119	FLEMING	Alexander forbes Retirement Fund
120	DISTELL	Alexander forbes Retirement Fund
121	SMC BRANDS	Alexander forbes Retirement Fund
122	CLOVER	Alexander forbes Retirement Fund
123	MR PRICE	Alexander forbes Retirement Fund
124	INCREDIBLE CONNECTION	Alexander forbes Retirement Fund
125	INVESTEC	Alexander forbes Retirement Fund
126	STYLE CLOTHING	Alexander forbes Retirement Fund
127	FOSCHINI	Alexander forbes Retirement Fund
128	GABORONE SUN	Alexander forbes Retirement Fund
129	GLOBAL HOLDINGS	Alexander forbes Retirement Fund
130	PPADB	Alexander forbes Retirement Fund
131	ACKERMANS	Alexander forbes Retirement Fund
132	PEP	Alexander forbes Retirement Fund
133	SANDVIK	Alexander forbes Retirement Fund
134	SHOPRITE	Alexander forbes Retirement Fund
135	MULTICHOICE	Alexander forbes Retirement Fund
136	SKIP HIRE	Alexander forbes Retirement Fund
137	EDCON-JET & EDGARS	Alexander forbes Retirement Fund
138	COLLINS	Alexander forbes Retirement Fund
139	UCCSA	Alexander forbes Retirement Fund
140	ALLAN GRAY	Alexander forbes Retirement Fund
141	BOPEU	Alexander forbes Retirement Fund
142	KOMATSU	Alexander forbes Retirement Fund
143	GAME STORES	Alexander forbes Retirement Fund
144	MULTIWASTE	Alexander forbes Retirement Fund
145	BANK GABORONE	Alexander forbes Retirement Fund
146	BPOPF SECRETARIAT	Alexander forbes Retirement Fund
147	AFFS	Alexander forbes Retirement Fund
148	BOTSWANA TOURISM ORGANISATION	Alexander forbes Retirement Fund
149	SEABELO'S EXPRESS	Alexander forbes Retirement Fund
150	LETSHEGO HOLDINGS LTD	Alexander forbes Retirement Fund
151	YARONA FM	Alexander forbes Retirement Fund
152	PCI	Alexander forbes Retirement Fund

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
153	PRIMEDIA	Alexander forbes Retirement Fund
154	SCANIA	Alexander forbes Retirement Fund
155	BAMALETE	Alexander forbes Retirement Fund
156	NTS PICK & PAY	Alexander forbes Retirement Fund
157	Botswana Accountancy College	Alexander forbes Retirement Fund
158	ORTHOSURGE	Alexander forbes Retirement Fund
159	KINGDOM BANK	Alexander forbes Retirement Fund
160	GOLDER ASSOC.	Alexander forbes Retirement Fund
161	GABORONE CONTAINER TERMINAL	Alexander forbes Retirement Fund
162	ST. JOSEPH	Alexander forbes Retirement Fund
163	MAGNUM FREIGHT	Alexander forbes Retirement Fund
164	UPT	Alexander forbes Retirement Fund
165	CHOPPIES	Alexander forbes Retirement Fund
166	EASIGAS	Alexander forbes Retirement Fund
167	NAMPAK	Alexander forbes Retirement Fund
168	CHESHIRE	Alexander forbes Retirement Fund
169	GPH	Alexander forbes Retirement Fund
170	TURNSTAR	Alexander forbes Retirement Fund
171	EUROSTAR	Alexander forbes Retirement Fund
172	AEL MINNING	Alexander forbes Retirement Fund
173	LEO SCHACHTER	Alexander forbes Retirement Fund
174	TIME PROJECTS	Alexander forbes Retirement Fund
175	ABSA LIFE	Alexander forbes Retirement Fund
176	JOHNSON CRANE HIRE	Alexander forbes Retirement Fund
177	DUNNS	Alexander forbes Retirement Fund
178	MASS MART	Alexander forbes Retirement Fund
179	MOCHUDI RESOURCE CTR	Alexander forbes Retirement Fund
180	CADBURY	Alexander forbes Retirement Fund
181	AIR LIQUIDE	Alexander forbes Retirement Fund
182	HORN OF AFRICA	Alexander forbes Retirement Fund
183	LAURELTON DIAMONDS	Alexander forbes Retirement Fund
184	PUMP SERVICES	Alexander forbes Retirement Fund
185	ATLAS COPCO	Alexander forbes Retirement Fund
186	LAS	Alexander forbes Retirement Fund
187	MG PROPERTIES	Alexander forbes Retirement Fund
188	KUDU COMMUNICATIONS	Alexander forbes Retirement Fund
189	CHOBE HOLDINGS	Alexander forbes Retirement Fund
190	SEKOLO SA ANNE-STINNE	Alexander forbes Retirement Fund

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
191	TYRES SERVICES	Millennium Botswana Retirement Fund
192	OTRACO BOTSWANA	Millennium Botswana Retirement Fund
193	AFRISURE	Alexander forbes Retirement Fund
194	BNPC	Alexander forbes Retirement Fund
195	HAIR SOLUTIONS	Alexander forbes Retirement Fund
196	HOMEC INVESTMENTS	Alexander forbes Retirement Fund
197	MARSH	Alexander forbes Retirement Fund
198	PARMALAT	Alexander forbes Retirement Fund
199	UNITRANS	Alexander forbes Retirement Fund
200	KGORI CAPITAL	Alexander forbes Retirement Fund
201	VDDDB	Alexander forbes Retirement Fund
202	ACE GIBB	Alexander forbes Retirement Fund
203	KALCON	Alexander forbes Retirement Fund
204	PLUCZENIK BOTSWANA	Alexander forbes Retirement Fund
205	SYMPHONIC	Alexander forbes Retirement Fund
206	BIBLE SOCIETY	Alexander forbes Retirement Fund
207	BIDVEST	Alexander forbes Retirement Fund
208	KROMBERG & SCHUBERT	Alexander forbes Retirement Fund
209	LIMKOKWING	Alexander forbes Retirement Fund
210	NEW ERA	Alexander forbes Retirement Fund
211	BOGOPA, MANEWE & TOBEDZA	Alexander forbes Retirement Fund
212	ERB	Alexander forbes Retirement Fund
213	MANCOSA	Alexander forbes Retirement Fund
214	BOFWA	Alexander forbes Retirement Fund
215	JOY GLOBAL	Alexander forbes Retirement Fund
216	MULTOTEC	Alexander forbes Retirement Fund
217	STEFANNUTTI	Alexander forbes Retirement Fund
218	BOTSWANA OIL	Alexander forbes Retirement Fund
219	NBL BOTSWANA	Alexander forbes Retirement Fund
230	REAL PAY	Alexander forbes Retirement Fund
231	MASTER PRODUCTS	Alexander forbes Retirement Fund
232	BONA LIFE	Alexander forbes Retirement Fund
233	ERICSSON BOTSWANA	Alexander forbes Retirement Fund
234	DYNAMIC ROAD SERVICES	Alexander forbes Retirement Fund
235	HORIZON OGILVY & MATHER	Alexander forbes Retirement Fund
236	STATE BANK OF INDIA	Alexander forbes Retirement Fund
237	DIMENSION DATA	Alexander forbes Retirement Fund
238	ANGLICAN BOTSWANA	Alexander forbes Retirement Fund

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
239	WILDERNESS SAFARIS	Alexander forbes Retirement Fund
240	CAN MANUFACTURERS	Alexander forbes Retirement Fund
241	BOBONONG MULTIPURPOSE CORP	Alexander forbes Retirement Fund
242	WEEKEND POST	Alexander forbes Retirement Fund
243	GIA BOTSWANA	Alexander forbes Retirement Fund
244	MEDPLUS	Alexander forbes Retirement Fund
245	PUDULOGONG REHAB CENTRE	Alexander forbes Retirement Fund
246	DATA NETWORKS	Alexander forbes Retirement Fund
247	RIVERSIDE HOSPITAL	Alexander forbes Retirement Fund
248	AFROX (PTY) LTD	Alexander forbes Retirement Fund
249	TRIOPTIMUM LOGISTICS	Alexander forbes Retirement Fund
250	VIRGIN ACTIVE	Alexander forbes Retirement Fund
251	BOITEKANELO GROUP	Alexander forbes Retirement Fund
252	PENRICH INSURANCE BROKERS	Alexander forbes Retirement Fund
253	TESCARECO BOTSWANA	Alexander forbes Retirement Fund
254	CONTINENTAL REINSURANCE	Alexander forbes Retirement Fund
255	PST SALES & DISTRIBUTION	Alexander forbes Retirement Fund
256	VEOLIA WATER TECHNOLOGIES BOTSWANA	Alexander forbes Retirement Fund
257	COMPANIES & INTELLECTUAL PROPERTY AUTHORITY (CIPA)	Alexander forbes Retirement Fund
258	KANYE SDA COLLEGE OF NURSING	Alexander forbes Retirement Fund
259	PEERMONT GLOBAL	Alexander forbes Retirement Fund
260	FUTURE SUSTAIN INTERNATIONAL (FSI)	Alexander forbes Retirement Fund
261	KANYE HOSPITAL	Alexander forbes Retirement Fund
262	MAPLETON GROUP	Alexander forbes Retirement Fund
263	NGAMILAND ADVENTURE SAFARIS	Alexander forbes Retirement Fund
264	GAMBLING AUTHORITY	Alexander forbes Retirement Fund
265	PREFSURE	Alexander forbes Retirement Fund
266	Cashbuild	Alexander forbes Retirement Fund
267	NAMPAK DIVFOOD	Alexander forbes Retirement Fund
268	BOOKBINDER BUSINESS LAW	Alexander forbes Retirement Fund
269	ALPHA DIRECT	Alexander forbes Retirement Fund
270	LEWIS GROUP BOTSWANA	Alexander forbes Retirement Fund
271	MEDLANE HEALTHCARE	Alexander forbes Retirement Fund
272	FRANKILN COVEY	Alexander forbes Retirement Fund
273	NON-BANK FINANCIAL INSTITUTIONS REGULATORY AUTHORITY	Alexander forbes Retirement Fund
274	DESERT SECRETARIAL SERVICES	Alexander forbes Retirement Fund
275	RTT LOGISTICS	Alexander forbes Retirement Fund
276	BONA LIFE PENSION PLAN FUND	Alexander forbes Retirement Fund

Appendix 4E: List of Sub Funds Under Umbrella Funds

	NAME OF SUB-FUND	UMBRELLA FUND
277	BONA LIFE PENSION PLAN	Millennium Botswana Retirement Fund
278	EXCLUSIVE INSURANCE SOLUTIONS	Millennium Botswana Retirement Fund
279	MOTSWEDI SECURITIES	Alexander forbes Retirement Fund
280	BOTSWANA QUALIFICATIONS AUTHORITY	Alexander forbes Retirement Fund
281	DANHOER CONTRACTING BOTSWANA & DANHOER	Alexander forbes Retirement Fund
282	BOTSWANA PLANT	Alexander forbes Retirement Fund
283	EXPRESS CREDIT	Alexander forbes Retirement Fund
284	GIZ	Alexander forbes Retirement Fund
285	NTT Nissan Group	Alexander forbes Retirement Fund
286	ALPHA DIRECT Insurance Company	Africa 53 Provident Fund
287	Amp Control Botswana	Africa 53 Provident Fund
288	Bidvest Group Limited	Africa 53 Provident Fund
289	Rural Metro Botswana	Africa 53 Provident Fund
290	BRITISH HIGH COMMISSION	Alexander forbes Retirement Fund
291	STOCKFORT HEALTH	Alexander forbes Retirement Fund
292	ICL BOTSWANA	Alexander forbes Retirement Fund
293	Capital Bank	Alexander forbes Retirement Fund
294	DESAI LAW GROUP	Alexander forbes Retirement Fund
295	CASH BAZAAR HOLDINGS GROUP	Alexander forbes Retirement Fund
296	NTT Nissan Group	Africa 53 Provident Fund

Appendix 4F: Management Companies and Funds Licensed to Botswana

COMPANY NAME	FUND NAME	CONTACT PERSON	CONTACT DETAILS
African Alliance Botswana Management Company (Pty) Ltd	Botswana Global Allocation Fund Botswana Global Income Fund Botswana Value Fund Botswana Global Income Fund Botswana Liquidity Fund	Sean Rasebotsa	PO Box 2770, Gaborone
Botswana Insurance Fund Managers Unit Trust (Pty) Ltd	BIFM Balanced Prudential Fund BIFM Global Growth Fund BIFM Global Balanced Fund BIFM Pula Money Market Fund BIFM US Dollar Money Market Fund BIFM Local Equity Fund BIFM Liquidity Fund	Neo Bogatsu Baledzi Makobo	Private Bag BR185, Gaborone
Ipro Umbrella Fund	Ipro Money Market Fund	O'neal Kgetse Clair Lesenda Mathe	Private Bag 351 Suite No. 472 Gaborone
Investec Fund Managers Botswana (Pty) Ltd	Investec Botswana Managed Fund	Martinus Seboni Tapiwa Kwerepe	PO Box 49, Gaborone
Stanlib Investment Management Services (Pty) Ltd	Stanlib Money Market Fund Stanlib Equity Fund Stanlib Managed Prudential Fund Stanlib Cash Plus Fund	Thabo Moipolai Phodiso Malope	Private Bag 00168, Gaborone
Prescient (Pty) Ltd	Kgori Capital Enhanced Cash Fund Kgori Capital Money Market Fund Kgori Capital Balanced Fund	Ephraim Letebele	P.O. Box 3576 Gaborone
Prime Collective Investments (Pty) Ltd	Prime International Commodities Active	Christopher Bray	P. O. Box 1839, Gaborone

Appendix 4G: Externally Licensed Funds Approved for Marketing in Botswana

COMPANY NAME	FUND NAME	CONTACT PERSON	CONTACT DETAILS
Orbis Investment Management Ltd	Orbis Global Equity fund US Dollar Orbis Global Equity fund Euro Orbis Japan Equity Funds US Dollar Orbis Japan Equity Funds Yen Orbis Japan Equity Funds US Dollar Orbis Japan Equity Funds Euro Orbis Asia ex-Japan Equity Fund Orbis Optimal Euro Fund Orbis Optimal US Dollar Fund Orbis Optimal YenFund	James Dorr	PO Box HM 571, Hamilton CX Bermuda Allan Gary Botswana
Allan Gray International Proprietary Ltd	Allan Gray Equity Fund (formerly Orbis Africa Equity Fund)	Onkabetse Bodigelo Phatshimo Ncube	Private Bag 149, Suite No. 107, Kgale View Allan Gary Botswana

Appendix 4G: Externally Licensed Funds Approved for Marketing in Botswana

COMPANY NAME	FUND NAME	CONTACT PERSON	CONTACT DETAILS	
Allan Gary Unit Trust Management Ltd South Africa	Allan Gray Equity Fund Allan Gray Balanced Fund Allan Gray Stable Fund Allan Gray Optimal Fund Allan Gray Bond Fund Allan Gray Money Market Fund Allan Gray-Orbis Global Equity Feeder Fund Allan Gray-Orbis Global Fund of Funds Allan Gray-Orbis Global Optimal Fund of Funds	Tapologo Motshubi	PO Box 457Add, Gaborone	Allan Gary Botswana
Ashburton Investments	Ashburton Sub Funds Sterling Asset Management Fund Dollar Asset Management Fund Euro Asset Management Fund Global Defensive Sterling Feeder Fund formerly Sterling Advanced Portfolio – Lower Risk) Global Balanced Sterling Feeder Fund formerly Sterling Advanced Portfolio – Moderate Risk) Global Balanced Dollar Feeder Fund (formerly Dollar Advanced Portfolio – Moderate Risk) Global Balanced Euro Feeder Fund (formerly Euro Advanced Portfolio – Moderate Risk) Global Growth Sterling Feeder Fund (formerly Sterling Advanced Portfolio – Higher Risk)	Moetedi Legae	PO Box 239, 17 Hillary Street, St Helier Jersey Channel Island Tel +44(0)1534513377	First National Bank Botswana
Investec Asset Management Ltd	Investec Global Strategy Fund All China Bond All China Equity American Franchise Asia Local Currency Bond Asia Pacific Equity Opportunities Asia Pacific Quality Equity Asian Equity Emerging Markets Blended Debt Emerging Markets Corporate Debt Emerging Markets Equity Emerging Markets Hard Currency Debt Emerging Markets Investment Grade Corporate Debt Emerging Markets Local Currency Debt Emerging Markets Local Currency Dynamic Debt Emerging Markets Local Currency Total Return Debt Emerging Markets Multi-Asset Enhanced Natural Resources European Equity	Martinus Seboni Tapiwa Kwerepe	P.O. Box 49 Gaborone	Investec Asset Management Botswana (Pty) Ltd



Appendix 4G: Externally Licensed Funds Approved for Marketing in Botswana

COMPANY NAME	FUND NAME	CONTACT PERSON	CONTACT DETAILS	
Investec Asset Management Ltd	European High Yield Bond	Martinus Seboni Tapiwa Kwerepe	P.O. Box 49 Gaborone	Investec Asset Management Botswana (Pty) Ltd
	Global Diversified Growth			
	Global Diversified Growth Fund (Euro)			
	Global Dynamic			
	Global Endurance Equity			
	Global Energy			
	Global Equity			
	Global Franchise			
	Global Gold			
	Global High Yield Bond			
	Global Multi-Asset Income			
	Global Multi-Asset Total Return			
	Global Natural Resources			
	Global Quality Equity			
	Global Quality Equity Income			
	Global Real Estate Securities			
	Global Strategic Equity			
	Global Strategic Managed			
	Global Total Return Credit			
	Global Value Equity			
	Investment Grade Corporate Bond			
	Latin American Corporate Debt			
	Latin American Equity			
	Latin American Investment Grade Corporate Debt			
	Latin American Smaller Companies			
	Sterling Money			
	Target Return Bond			
	UK Alpha			
US Dollar Money				
Sanlam Asset Management (Ireland)	Sanlam BIFM Global Fixed Income Fund	Neo Bogatsu	Private Bag BR185, Gaborone	BIFM (Pty) Ltd
	Sanlam BIFM World Equity Fund			
	Sanlam BIFM Emerging Markets Equity Fund			
FNB Insurance Brokers Botswana (Pty) Ltd	Ashburto Fund	Kotlu Matlape	P. O. Box 1552, Gaborone	FNB

Appendix 4H: Licensed Asset Managers

	COMPANY NAME	CONTACT PERSON	CONTACT DETAILS
1	African Alliance Botswana Management Company (Pty) Ltd	Sean Rasebotsa	PO Box 2770, Gaborone
2	Africa Lighthouse Capital t/a BLP Capital	Bame Pule	P O Box 118 Gaborone
3	Aleyo Capital (Pty) Ltd	Mosimanegape Mogegeh	PO. Box 2518, Gaborone
4	Allan Gray Botswana (Pty) Ltd	Onkabetse Bodigelo Phatshimo Ncube	Private Bag 149, Suite No. 107, Kgale View
5	AME Capital (Pty) Ltd	David Premeji	Private Bag 10, Gaborone
6	BIFM Botswana Limited	Neo Bogatsu Baledzi Makobo	Private Bag BR185, Gaborone
7	BlackThread Capital (Pty) Ltd	Maleho Mothibatsela Kalyan Gogoi	PO Box 20534, Gaborone
8	Capital Management Botswana (Pty) Ltd	Rapula Okaile	PO Box 202548, Bontleng
9	Confianza (Pty) Ltd	Don Gaetsaloe	P/Bag 262 Gaborone
10	Confianza Capital Private Equity (Pty) Ltd	Don Gaetsaloe	P/Bag 262 Gaborone
11	FinCraft (Pty) Ltd	Gao Seleka-Sekonopo Monica Moalosi	Private Bag BO 65, Bontleng, Gaborone
12	Fleming Asset Management Botswana (Pty) Ltd	Karabo Petto Brandeon Hartney	PO Box 2111, Gaborone
13	Impact Investment Africa (Pty) Ltd	Chris Hart	Private Bag 4 Pitsane
14	Investec Asset Management Botswana(Pty) Ltd	Martinus Seboni Tapiwa Kwerepe	PO Box 49, Gaborone
15	Inkunzi Investments (Pty) Ltd	Father Maphongo	Plot 1078, Selokwana, Tlokweng Gaborone
16	Ipro Botswana (Pty) Ltd	O'neal Kgetse Claire Mathe Lisenda	Private Bag 351, Suite No 472, Gaborone
17	Kgori Capital Botswana (Pty) Ltd	Alphonse Ndzinge	PO Box 1253, ABG, Sebele
18	Morula Capital Partners (Pty) Ltd	Boikanyo Mogami	Plot 1131-7, Queens Road, Main Mail, P.O. Box 2770, Gaborone
19	Musa Capital Botswana	Lesego Selotate	C/O P O Box 406
20	Prime Collective Asset Management (Pty) Ltd	Christopher Bray	P. O. Box 1839, Gaborone
21	Stanlib Investment Management Services (Pty) Ltd	Thabo Moipolai Phodiso Malope	Private Bag 00168, Gaborone
22	VPB (Pty) Ltd	Anthony Siwawa	Private Bag 00304, Gaborone
23	Ecsponent Asset Management (Pty) Ltd	Joseph Mosimane	P.O. Box 382 AAH, Gaborone
24	Ipro Ponelepele (Pty) Ltd	Clair Lesenda Mathe	Private Bag 351 Suite No. 472 Gaborone

Appendix 4I: Licensed Trustees and Custodians for Collective Investment Undertakings

	COMPANY NAME	CONTACT PERSON	CONTACT DETAILS
1	First National Bank Botswana	Dintle Samborna Stephen Bogatsu	P.O. Box 1552 Gaborone
2	Stanbic Bank Botswana	Maduo Thebe Vincent Baituti	Plot 50672, Stanbic House, Off Machel Drive, Fairgrounds Private Bag 00168, Gaborone
3	Standard Chartered Bank Botswana	Otlasala Khan	Standard Chartered Bank, Standard House, Main Mall, P.O. Box 496, Gaborone

Appendix 4J Licensed Investment Advisors

	COMPANY NAME	CONTACT PERSON	CONTACT DETAILS
1	Alexander Forbes Asset Consultants (Pty) Ltd	Ati Mannathoko Keneilwe Ramonaka	Private Bag 00410, Gaborone
2	Alexander Forbes Financial Services Botswana (Pty) Ltd	Poloko Masitara Keneilwe Ramonaka	Private Bag 00410, Gaborone
3	Carrick Wealth (Pty) Ltd	Kevin Day	Office 3a, Third Floor, Masa Centre, Plot 54353, Gaborone, Botswana
4	DeVere Acuma Botswana (Pty) Ltd	Richard Gartland	P O Box 505200 Gaborone
5	Exclusive Insurance Solutions (Pty) Ltd	Thomas B. Moipolai	P. O. Box 404268, Gaborone
6	Fiducia Advisory Services (Pty) Ltd	Kabo Kgopo	P.O. Box 70409, Gaborone
7	FNB Insurance Brokers (Pty) Ltd	Richard C. Wright Thabo Gaadingwe	P. O Box 1552, Gaborone
8	Key Intelligent Solutions (Pty) Ltd t/a Key Wealth	France Mogomotsi	P O Box 660ABG Sebele
9	Malaczynski Burn (Pty) Ltd	Cornelius Ramatlhakwane Baboloki Mothuti	PO Box 1839 Gaborone
10	Novare Actuaries and Consultants Botswana (Pty) Ltd	Ivan Mosothoane	P O Box 485 AAH Gaborone”
11	Riscura Botswana (Pty) Ltd	Neville Stewart Blake Field	P O Box 294, Gaborone
12	S.C.I Financial (Pty) Ltd	James Fern	PO. Box AE628, AEH, Gaborone
13	Standard Chartered Investment Services (Pty) Ltd	Esther Mokgatlhe Otsile Mabeo	P O Box 496, Gaborone
14	Strategic Wealth (Pty) Ltd	Nadine Davies	PO Box AD 872 ADD, Postnet Kgaleview, Gaborone
15	Thuma Advisors (Pty) Ltd	Thuto Mahlanza	PO Box 70144, Gaborone
16	Ticano Group (Pty) Ltd	Opelo Motswagae	P. O Box V380, Ramotswa

Appendix 4K: Licensed Stockbrokers

	COMPANY NAME	CONTACT PERSON	CONTACT DETAILS
1	Imara Capital Securities (Pty) Ltd	Gregory Matsake	Unit 6, 2nd Floor, Morojwa Mews Plot 74770 Western Commercial Road New CBD, Gaborone, Private Bag 173 Gaborone, Tel: 3188886 Fax: 3188887
2	African Alliance Botswana Securities Limited	Kabelo Mohohlo Chazha Balule	Ground Floor, Exchange House Plot 64511 Fairgrounds P. O. Box 2770 Gaborone. Tel: 3643900 Fax: 3910636
3	Stockbrokers Botswana Limited	Hajira Sethole Bokete Mokgosi	Plot 74358, Morula Building, North Wing, Prime Plaza, CBD Gaborone, Private Bag 00113 Gaborone, Tel: +267 3957900 Fax: +267 3957901
4	Motswedi Securities (Pty) Ltd	Kelemosadi Gaorengwe	Plot 113 Unit 30 Kgale Mews, Gaborone, Private Bag 00223. Tel: 3188627 Fax: 3188

Appendix 4L: Licensed Securities Infrastructure Businesses

	COMPANY NAME	CONTACT PERSON	CONTACT DETAILS
1	Botswana Stock Exchange	Tidimalo Poonyane	Fairscape Precinct, Plot 70667, Fairgrounds Office Park, Private Bag 00417, Gaborone. Tel: 3180201 Fax: 3180175
2	Central Securities Depository Company Of Botswana Limited	Tidimalo Poonyane	Fairscape Precinct, Plot 70667, Fairgrounds Office Park, Private Bag 00417, Gaborone. Tel: 3180201 Fax: 3180175

Appendix 4M: Registered International Financial Services Centre (IFSC's)

	COMPANY NAME	CONTACT PERSON	CONTACT DETAILS
1	Emeritus International Reinsurance Limited	Leo Huraya	Unit 3, Block A, Plot 117, Millennium Office Park, Kgale Hill, Private Bag 00186, Gaborone Tel: 3188710 Fax: 3191767
2	Imara Holdings Limited (Pty) Ltd	Hector Flemming Harry Wulssogn	Morojwa Mews, Plot 74770, Western Commercial Tel: +267 318 8710
3	Letshego Holdings Limited	Stephen Price Chris Low	First Floor, Letshego Place, Khama Crescent, P.O. Box 381, Gaborone Tel: 3643008 Fax: 3957959
4	Norsad Finance Limited	Gosegomang Modise	P.O. Box 1476 ABG, Plot 74770, Western Commercial Road, CBD, Gaborone. Tel: 3160860 Fax: 3160782
5	Aon Risk Management (Pty) Ltd	Paul Ramokgalo	P.O. Box 624, Gaborone

Appendix 4N: List Of Micro Lenders

	NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
1	Abakwa Investments (Pty) Ltd	Plot 54483 Molapo Crossing Gaborone P O Box AE 514 AEU Gaborone	Tel: 3922398	Alen Isaac Achu
2	Abercorn (Pty) Ltd	Mogoditshane Nkoyaphiri Mall Shop 24 P O Box 501412 Gaborone	Tel: 3158118	Desma Elivils-Ncaagae
3	AdimaMorokotso O Monnye (Pty) Ltd	Dabo House Office Unit 2, Francistown P O Box 40127 Francistown	Tel: 241970 Cell: 72601809	Franciois Jacobs
4	Adimanang (Pty) Ltd	P O Box 1450 Gaborone	Tel: 3974774	Susanna Gouws
5	Advance Lender Cash Loans (Pty) Ltd	Moshawana Ward P O Box 201130 Mochudi	Tel: 777438 Fax: 5777438 Cell:71383802	Elma Ditshego
6	Afritec (Pty) Ltd	Magochanya road Block 3 Private Bag BR 60 Gaborone	Tel: 3670702 Fax: 3190096	Christo Klopper
7	Akum Building and Construction t/a Impala Cashloan & Pawnshop	Office 111 Kollenberg Center Main mall Gaborone, P O Box 5546 Gaborone	Tel: 3909651 Fax: 3909641	John Taolo
8	Alafisa (Pty) Ltd	P O Box 126 Gaborone	Tel: 3901165	Cornelias Baboloki Nkane
9	Amour Micro Lenders (Pty) Ltd	Plot 1051 Extension 2 Gaborone P O Box 80489 Gaborone	Cell: 76369903/ 73865070	Beauty Tshuma
10	Antonio Bush Gardens Investments (Pty) Ltd	Plot 12114 Block 4 Francistown P O Box 343 Masunga	Tel: 2405996	Antony Masalila
11	Apple Craft Investments (Pty) Ltd	Plot 19300 Gaborone west phase 2 Gaborone P O Box 133ABE Gaborone	Cell: 72916445	Masalela Bino Maleka
12	Aster Reefs Investments (Pty) Ltd	Pitse – Sereto Complex Mmadinare P O Box 1241 Mmadinare	Cell:71971434/ 77095739 Tel: 3663244	Letsweletse Gaoboditswe
13	AT & T Monnakgotla Transport (Pty) Ltd T/A Macheng Cashloans	Plot 182, Queens Road Main Mall P.O. Box 60474 Gaborone	Tel: 3938788 Fax: 3500419	Abel Monnakgotla
14	Babereki Investments (Pty) Ltd	Lot 931, Extension 2 African Mall P O Box 1708 AAD Poso House Gaborone	Tel: 3922526/3916219 Fax: 3181646	Edith T. Motshegare
15	Bamenda Holdings (Pty) Ltd t/a Alo Fastcash	K- Garments Plot 15065/001/0 Francistown P O Box 11829 Tatitown	Tel: 74573979	Thabiso Manyepeza
16	Baraldman Investments (Pty) Ltd t/a Morph Cash Loans	First Floor, Unit 13 Plot 79, Makwapa Complex, P O Box 596 Palapye	Tel: 4920068 Fax: 4920076	Moreri U Nwako
17	BK Ventures (Pty) Ltd	Unit 13134, Bestways Building, Broadhurst, P.O. Box 403236 Gaborone	Tel: 3903075 Fax:3903075 Cell: 72120251	BG Malan
18	Black and Blu (Pty) Ltd t/a Kopano Kwik Cash	Plot 2147A Woodhall Industrial Lobatse, P O Box 744 Gaborone	Tel: 5334780	Gary Edgar Johns
19	Blue Berry Hairsaloon t/a Blue Berry Cash Loan	Plot 797 Unit G Khama 1st Avenue Lobatse	Tel: 5334758 Cell: 73230691	Eric Danso
20	Blue Employee Benefits (Pty) Ltd	Plot 205 Extension 3, Independence Avenue Gaborone, Private Bag 351 Gaborone	Tel: 3954053 Fax: 3909180	Morwadi Morwadi
21	Boletso Cash Loan (Pty) Ltd	Old Mall Rusiana's complex P O Box 588 Maun	Tel: 6861415	Mompoloki Loso

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NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
22 Bomoms Cash Loan (Pty) Ltd	Thagana Ward Maunatlala P O Box 373 Maunatlala	Cell:72736696 Tel:54605116	Kereeditse S. Mokopakgosi
23 Bophirima Investments (Pty) Ltd	Unit 8 Carbo Center River walk Gaborone P/Bag BR 154 Gaborone	Tel: 3903720 Fax: 3190696	Sadie Serokane
24 Botheb's Cash Loan (Pty) Ltd	P O Box 361 Orapa	Tel: 2976720 Fax: 2976200	Kabo Molelwane
25 Bothale Investments (Pty) Ltd	Northgate Mall Unit 10 Francistown P/Bag 727 Francistown	Tel: 2417474/2147770 Fax: 2410898	Judith Ntelecha
26 Brains (Pty) Ltd t/a The Loan Room	Plot 117 Unit 3 Kgale Mews Gaborone	Tel: 3185575	Vincent Mosweu Koloba
27 Bramm's Investments (Pty) Ltd t/a Update loan Investments	Plot 2537 Unit 40 Selibe Phikwe Square P O Box 2395 Selibe Phikwe	Tel: 2610720 Fax: 2610720	Kearabile Phutego
28 Bright Employee Benefits (Pty) Ltd	1ST Floor Capricorn House Plot 165 Pilane Road Gaborone Private Bag 00348 Gaborone	Tel: 3188001 Fax: 3188003	Kealeboga Santsoma
29 Business Giants (Pty) Ltd	Shop No. 17, Plot 17945, Kagiso Centre, Broadhurst, Private Bag BR 351, Suite 276, Gaborone	Tel: 3158466 Fax: 3915691	Adolph Jacobs Jans van Rensburg
30 Caftan (Pty) Ltd	Plot 684 Botswana Road Gaborone P O Box 45889 Riverwalk Gaborone Botswana	Tel: 3925344 Cell: 3925223	Gaboetelwe Moloji
31 Calvom Investments (Pty) Ltd	Plot 59524 Gaborone P O Box 201686 Gaborone	Tel: 3186929 Cell: 71539386	Calvin Moilwa
32 Capristone Investments (Pty) Ltd	Plot 1239/6 Haile Selassie Road	Cell: 72448370	Sanini Moyo
33 Cash Briefcase	Broadhurst Industrial Gaborone Plot 5665 Unit 11B P O BOX 3540 Molepolole	Tel: 3912783	Phillip Ntokwane
34 Cash Corp Investments (Pty) Ltd	Plot 1140 Main Mall Gaborone P O Box 21408 Bontleng Gaborone	Tel: 3903616 Cell: 71378936	Martin De Kock
35 Catbok Investments (Pty) Ltd	2nd Floor Suite 205 Blue Jacket Square Francistown, P O Box 244 Francistown	Cell: 71625256	Cathrine Mokgopo
36 Chad Aurica (Pty) Ltd t/a Dunchad Cash loan	Plot 310 Grand plaza Francistown P O Box 301763 Francistown	Tel: 2416377 Fax: 2416377	Retlhabiseng Mosinyi
37 Chaffinch Investments (Pty) Ltd t/a Cashpower	Office No 2 Block 1 The Mall Selibe Phikwe Private Bag 075 Selebi Phikwe	Tel: 2611832 Fax: 2611832	Cindy Swarts
38 Chibaco Cash Loan (Pty) Ltd	Tawana ward Letlhakane P O Box 2846 Serowe	Tel: 2976585	Kefilwe Motswasele
39 Citizen Efforts (Pty) Ltd t/a Tlhabatsi	Plot 50667 Unit 4 First Floor Blue Mango, Fairgrounds, Gaborone	Tel: 3112971	Mosimanegape Mothibi
40 Clemmar Services (Pty) Ltd	Plot 1251 Haile Selassie Road Gaborone P O Box 40785 Gaborone	Tel: 3170632	Pule Moreri
41 Close Friends Investments (Pty) Ltd	Plot 1239/6 Haile Selassie Road Gaborone, P O Box 404065 Gaborone	Tel: 3933513	Lucky Khatazo

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NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
42 Con Amor 1 (Pty) Ltd	Lot 5681, Kudu Road, Broadhurst Industrial Site, PostnetKgale View, P O Box 8ADD, Gaborone	Tel: 3162111 Cell: 71441500 Fax: 3182787	Cornelia Blokker
43 Cono Enterprises (Pty) Ltd	Mokgobelele Ward Letlhakane P O Box 30847 Francistown	Tel: 2419705	Collet Oagile
44 Coracle Investments (Pty) Ltd	Plot 13128 & 13120, Unit 1 BBS Mall Private Bag BR 270 Gaborone	Tel: 3925755 Fax: 3925755	Adrian J. Scharnick
45 Coventry (Pty) Ltd t/a Loanstar	Plot D25/D26 Old Mall Maun P O Box 2845 Gaborone	Tel: 6861843	Monica Kruger
46 Currency Links (Pty) Ltd	Unit 6, Office 11; Haille Selasie Road P O BOX 402709, Gaborone	Tel: 3114253 Fax: 3163107	Witness Tobaka
47 Damont Holdings (Pty) Ltd	Plot 50667 Medical Mews Fairgrounds Gaborone	Tel: 3913276	Morwadi Adrienne Morwadi
48 Derunde Capital Funding (Pty) Ltd	P O Box 11829 Tati town	Tel: 2413068	Alonjang C. Andrew
49 Destination Reached (Pty) Ltd T/A M & R Eazy-Get-Loans	Plot 6164, Ramfurwa, Tlokweng P.O.Boc AD50 AAF,Southing,Gaborone	Tel: 3960056 Fax: 3917573	Maria Dambuzza
50 Dobe and Shobe Enterprises (Pty) Ltd	Plot 1094, Embassy Chambers, Unit 23, Mail Mall, Gaborone P O Box 4593 Gaborone	Cell: 72642865 Tel: 3934621	Opelo Gabaatholwe
51 Drizzles (Pty) Ltd	Optical Centre Botswana, Unit 4B, Main Mall Gaborone P O Box 81008 Gaborone	Tel: 3953073 Fax: 3959940 Cell: 73670607	Marguerite Serema
52 Duhamel Investments (Pty) Ltd t/a SBB Cashloan	Plot 9943 Block 3 Francistown P O Box 11469 Tatitown	Tel: 2421361	Sebonye Randall
53 Eagle Point (Pty) Ltd	Nigerian High Commission, First Floor, Main Mall, Plot 1086, Extension 3 P. O. Box 2784, Gaborone	Tel: 3957466 Fax: 3957477	Ferdinand J. Niehaus
54 Ecomon Services (Pty) Ltd	Plot 129, Unit D Gaborone International Finance Park, P.O.Box AE474AEH	Tel: 3903849	Montle Phuthego
55 Emisang Investments (Pty) Ltd	Plot no 6878 Extension 20 Gaborone, P O Box 70022 Gaborone	Tel: 71798714	Gabarate Rachiel Mandevu
56 Empire State (Pty) Ltd T/A Vix Cashloan	Plot 2871 Unit 3 Ext 11 Gaborone Postal Address: P O Box 53470 Gaborone	Tel: 3933912 Fax: 3933912	Geraldine Nkombeledzi
57 Equin Group (Pty) Ltd	Plot 1277 Clover House, Unit 5 Old Lobatse Road	Cel: 71848152 Tel: 3500163	Gabriel Israel Banda
58 Fermamo Investments (Pty) Ltd t/a Fertema	Shop No 24 F, KB MALL, PLOT 28582 P O Box AD 98 AAF, Gaborone	Tel: 3105428 Fax: 3105510	Tsetse Mpopisa
59 Feron Investments (Pty) Ltd	Nigerian High Commission, First Floor, Main Mall, Plot 1086, Extension 3 P. O. Box 2784, Gaborone	Tel: 3181246/7 Fax: 3181210	Ferdinand J. Niehaus
60 Fin- All Enterprises (Pty) Ltd	Plot 17974 Gaborone P O Box 20076	Tel: 3924923 Fax: 3922795	Kabelo Plato Gaoboi
61 Finaid Botswana (Pty) Ltd	Plot 188 Town center P O Box 2784 Gaborone	Tel: 5300180	Ferdinand J. Niehaus

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NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
62 Finchoice (Pty) Ltd	Plot 50362 Showgrounds Office Park	Tel: 3188988	Paul Burnett
63 Finfirm (Pty) Ltd	Plot 1322 Mafatswa ward Tlokweng P O Box 1156 Gaborone	Cell: 71416000	Mercy Marieta Puso
64 Fringilla (Pty) Ltd	Plot 17847 G/West Industrial Gaborone P O Box 602400	Tel: 3918031 Fax: 3918019	Janson c. Smith
65 Get Bucks(Pty) Ltd	Unit 8, Plot 126 Millennium Office Park Private Bag 19 Gaborone	Cell: 76102712	A.M. De Kock
66 Glambuh Enterprises (Pty) Ltd	Office 75 level 7 Barclays Piazza Francistown, P O Box 30352 Francistown	Tel: 2419409	Gladys Mbulayi
67 Global Credit Solutions (Pty) Ltd	Plot 199 Unit 29 Gaborone International P O Box 26384 Gaborone	Tel: 3951363 Fax: 3951368	Thapelo Letsholo
68 Global Way (Pty) Ltd	Plot 178 Unit 3 Commerce Park	Tel: 3932399 Fax: 3932390	Mothataesi Casalis
69 Goldshire Botswana (Pty) Ltd	Plot 2644 Extension 9 Phuti Road Gaborone	Tel: 3111362	Armstrong Richard
70 Gomela (Pty) Ltd	Plot 8884, Shop 3, Rizka House, African Mall, P O Box AE 77 AEH Gaborone	Tel: 3158516 Fax: 3909313	Franci Barwise
71 Goldscreen (Pty) Ltd	Office #37 Plot 4790 Electron House Gaborone Postal address: P. O. Box 50394, Gaborone	Tel: 71790834	Gladys Feke
72 Green Flap (Pty) Ltd T/A Green Flap Cash Loan	Plot 1174-1177, Main Mall, P O Box 25ABFGaborone	Cell: 75952906 75952905	Giveus Mathe
73 Grey Wings Enterprises (Pty) Ltd T/A Grey Wings Cashloans	Plot 1156, Office 202 Nkoyaphiri, Mogoditshane P O Box 60383 Gaborone	Tel: 3924616 Cell: 73361215	Galeme Sosome
74 Guile & Khoisan Capital (Pty) Ltd	Lot 8824 Khama Crescent Barclays House Government Enclave Gaborone P O Box 3751 Gaborone	Tel: 3133827 Fax: 3133839	Peter Kgomotso
75 Hi-Rated (Pty) Ltd	Phikwe square, office 38 P O Box 3299, Gaborone	Cell: 71655721	Mbuya Ntabe
76 Idah-Kan Investments (Pty) Ltd	Plot 1300 Block 9 Francistown P O Box 2927 Francistown	Cell: 77094548	Idah Ikanyeng
77 Ikaego Investments (Pty) Ltd	Maboledi Ward Tonota	Cell: 73433151	Leruo Serufo
78 Cash Connexions Microlenders	Plot 81300 Gaborone	Cell: 71328112/ 71328134	Collen K. Masala
79 Inspire Capital Investments (Pty) Ltd	Plot 1840 Unit 15A Mebala House, Opposite Western Union Mainmall	Tel: 3170663	Bando Tlhomani
80 The Feel Bay Investments (Pty) Ltd t/a Kay & Ree Services	Plot 24538 Gaborone West P O BOX 602327 Gaborone	Cell: 71847270/ 74649449	Kagiso David Motswagae
81 Incibo Wire t/a Incibo Wire Money	Plot 2991, Bokaa P O BOX 22 Bokaa	Cell: 73292917/ 71915059	Bumo Boemo Nthoiwa

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	NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
82	Jago Investments (Pty) Ltd	Jago House, Boikago Ward, P O Box 1002 Palapye	Tel: 4920026 Fax: 4920049	Joseph B. Gampone Andrew Mmopelwa
83	JAJ Investments (Pty) Ltd t/a Mozeks	Shop 1 Riverwalk Shopping Centre Tlokweng Rd Gaborone P O Box 3424 Francistown	Cell: 74371816/ 75646282	Goitsewang Sekeseke
84	Jarona investments (Pty) Ltd	Tawana Ward, Letlhakane P O Box 338 Orapa	Tel: 2978733 Fax: 2978733 Cell: 71417867/71727380	Onthametse Ratsie
85	Jat Cashloan (Pty) Ltd	P O Box 731, Jwaneng	Cell: 73818283/ 71211037	Kgakgamatso Mogorosi
86	Jentles Investments (Pty) Ltd t/a Mbakiso Micro lenders	Tati siding P O Box 68 Tati siding	Tel: 72260333/ 71581896	Chatapiwa Molapisi
87	Jogasi Investments (Pty) Ltd	Suite 3 first floor Nswazwi mall Francistown P O Box 301106 Francistown	Tel: 2440023 Fax: 2440024	Alex Okoche
88	JRS Venture (Pty) Ltd	Plot 687 Extension 2 Gaborone P O Box 403360 Gaborone	Tel: 3181079 Fax: 3934346	Winnifred Fanyane
89	Jufel (Pty) Ltd t/a Jufel Micro lending Services	P.O Box 2130, Mogoditshane	Cell: 71326471	Judith Duduzile Mulenga
90	Kamogano Rahube t/a Morakamo Investments	Lot 691 Extension 2 Gaborone P O Box 2015	Cell: 73861002/ 71373820	Kamogano Rahube
91	Kewillmart Investments (Pty) Ltd T/A WilmartCashloan	Plot No. 831 Jwaneng Main Mall P O Box 1653 Jwaneng	Tel: 5883869 Fax: 5883569 Cell: 71268030	Keemenao Matutu
92	KG Money Center (Pty) Ltd	Mamre Holdings, Plot 1838, P O Box 429 Palapye	Tel: 4923383 Fax: 4923383 Cell: 72577538	Kagelelo Goleanye
93	Kodwa Munthu Cashloan (Pty) Ltd	Monathoko Ward, Masunga P.O. Box 151 Masunga	Tel: 2489593 Cell: 71536409	Sicinoso Malabe
94	Kredicell (Pty) Ltd	Plot 891 Kunda road Gaborone P O Box 00224 Gaborone	Tel: 3682006 Fax: 3972034	Douglas Mophuti
95	Lamuse (Pty) Ltd	Itowers CBD Plot 54368 First Floor	Tel: 2610495	Amu Chilani
96	Legald Investments (Pty) Ltd T/T Unald Loans	Unit 17, First Floor, Plot 79, Makwapa Complex P O Box 10733 Palapye	Tel: 4920081 Fax: 4920682 Cell: 75928767	Tapela Basiti
97	Lego Investments (Pty) Ltd t/a Mabo's Cashloan	Plot 308/9 CBD Haskins Street Francistown, P O Box 1754 Francistown	Cell: 71754449 Tel: 2402213	Andina Dikgale
98	Frijo Court (Pty) Ltd	Plot 50161 Section 7 Building 2 Keko Ground Park Offices Block 5	Cell: 76191712	Mike Hiniye Heniye
99	Letlotlo la Khumo Investments (Pty) Ltd	Plot 3993/ M169 Minestone Francistown P O Box 301782	Cell: 74302792 Fax: 2420608	Kelebogile Morei
100	Letshego Financial Services (Pty) Ltd	Ground & First Floor, Letshego Place, Plot 22, Khama Crescent P O Box 381 Gaborone	Tel: 3643300 Fax: 3190418	Legae Mboni Moetedi
101	Lilly – Tee and Sech Investments (Pty) Ltd	Auto lot house Plot 694 CBD Haskins Street P O Box 20938 Monarch Francistown	Tel: 2405321	Oeme Schele

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	NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
102	Lims Consortium Botswana	Plot 5251 Lesedi Mall Selibe Phikwe	Tel: 3981953 Fax: 3981901	Ntungamili Malima
103	Lindenvilla Holdings (Pty) Ltd t/a S& T Micro lenders	Plot 6036 Floor 1 Office 07 Gaborone	Tel: 3114106 Cell: 71608820	Mmoloki Scooter Mokgwatlhe
104	Lobmicrofin (Pty) Ltd	Plot 126 Kgale View 2ND Floor Unit 17 Gaborone International Finance Park P O Box 46534 Gaborone	Tel: 3914762 Fax: 3914762	Barulaganyi Keadikang
105	Lomme Cash Loans (Pty) Ltd	Plot 6402, Tlhwane Road, Broadhurst Industrial, P.O. Box 40985 Gaborone	Tel: 3936514 Fax:3936514 Cell:73700270	Sibongile Molalapata
106	Lotus Enterprises (Pty) Ltd	Thito house Nekedi Road Broadhurst P O.Box 2368 Gaborone	Tel: 3170480	Haim Smadja
107	Luisa Enterprises (Pty) Ltd	Tawana Extension Letlhakane P O Box 1206 Orapa	Tel: 72645445	Aluisia Mahowe
108	Mabote Investments (Pty) Ltd	Plot 846, Jwaneng Main Mall P O Box 120 Jwaneng	Tel: 5883433 Fax: 5883433	G.G.Mabote
109	Madi Madi Investments (Pty) Ltd	Plot 2577 Block 1 P/Bag 0041 Selibe Phikwe	Tel: 2614907 Fax: 2914917	Rene De Wall
110	Maisonette Investments (Pty) Ltd	Unit 3, Plot 1247, Xhosa 1 Ward P O Box 602400 Mahalapye	Tel: 3918031 Fax: 3922710 Cell: 7178204	Martha Matsebe Mokgohloa
111	Malinic Investments (Pty) Ltd	Plot 6575/1Tshekedi Road Selibe Phikwe Private Bag 00150 Selibe Phikwe	Tel: 2611744 Fax: 2611744	Jacques Malan
112	Mankge Holdings (PTY) Ltd T/A Maatla Cashloans	Life and Pensions House, Kgosing Ward, Thamaga, P.O. Box 686 Moshupa	Tel: 5999801 Fax: 5999801 Cell: 72393096/ 76071443	Oteng Nkge
113	Manual Workers Union Benefits Scheme	Plot 131 Unit 5, Kohinoor Park Offices Plot no. 17847	Tel: 3933316 Fax: 3933317	Ndapiwa Judith Kesalefa
114	Mapleton (Pty) Ltd	Tasva House 1ST floor Gaborone West Industrial new road, P O Box 602400 Gaborone	Tel: 3922710 Fax: 3930505	Martha M. Mokgohloa
115	Mapororo Cash Loan (Pty) Ltd	Plot No. 3193 (Office No. 15) Union House Meepong road P O Box 1205 Selibe Phikwe	Cell: 73947338 Fax: 2600457	D Segakise
116	Mapula (Pty) Ltd	Plot 173, Khama 1 Avenue P. O. Box 271 Lobatse	Tel: 5306879 Fax: 5306879	Moemi Nthapelo
117	Max-Aur Marketing Services (Pty) Ltd	Plot 21100 Gaborone P O Box 301723 Tlokweng	Tel: 3164623	Martin Ragontse
118	Mbaki&Bofelo Holdings (Pty) Ltd	Plot 5251, Shop No. 01 P O Box 1298. S/Phikwe	Tel: 2622226 Fax: 2622226	Patricia Nkhwanana
119	Meadow Investments (Pty) Ltd	Plot 3423, Matima Crescent, Extension 12, P O Box 46449 Gaborone	Cell: 72106997	Patrick C Honnet
120	Melubotah Investments (Pty) Ltd	Saoshoko Ward P O Box 162 Shakawe	Cell: 76232138	Lucia Moswela
121	Meriting (Pty) Ltd	Plot 28582, KB Mall, Unit 23B, Gaborone P. O. Box 46205 Gaborone	Tel:3924223 Cell:76693533/73558589	Idah Masalila

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122	MFS Investments (Pty) Ltd	Nwako Complex Shop no.11 Old Mall Palapye, P O Box 3081 Mahalapye	Tel: 4924869 Fax: 4924869	Mangisi Segadimo
123	Mindwalk Investments (Pty) Ltd	Plot 20620 Acts House Unit 20 Block 3 P O Box 54 Mompame	Tel: 3112308 Fax: 3112308	Mogi Mophuti
124	MMD Investments (Pty) Ltd T/A Lulu Cashloan	Blue Jacket Street, Suite 112 P.O. Box 1038, Francistown	Tel: 29810303 Cell:71310598	David Mbaakanyi
125	Momatts Investments (Pty) Ltd	Plot 54611 Block 5 Gaborone P O Box 30218 Tlokweng Gaborone	Tel: 392897 Fax: 3901198	Mompoloki Segokgo
126	Money Quest Investments (Pty) Ltd t/a Bayport Financial Services	1st Floor, 204 Independence Avenue Opposite Time Square) P O Box 2748 Gaborone	Tel: 3936504 Fax: 3180831	Father Maphongo
127	Moneywise Botswana (Pty) Ltd	Plot 5643 Unit 15 Broadhurst Gaborone P O Box 8 ADD Gaborone	Tel: 3182787 Cell: 71389094	C. Blokker
128	Moola Group (Pty) Ltd t/a Moola Microlender	Plot 3391 Extension 12 Gaborone	Tel: 3933785	Mpho Donnell
129	Mopani Investors (Pty) Ltd	Plot 383-845 Blue Jacket street Francistown, Private Bag F388	Tel: 2417199 Fax: 2416474	Robert G. DeKlerk
130	Mossmat (Pty) Ltd	Plot 1146 Unit 10 Koih-Nor House, Main Mall Gaborone, P O Box 4026 Gaborone	Cell: 72444913	Moses Matomela
131	More Mula (Pty) Ltd	Serorome Ward Palapye P.O. Box 5 Marobela	Cell: 72491298 /79210370	Timuno Ndiye Timuno
132	Motlhobo Investments (Pty) Ltd	Letsibogo Ward, Letlhakane P.O. Box 871 Orapa	Tel: 2976618 Fax: 2976618 Cell: 71698580	Tlhomamiso Mogaetsho
133	Mumsey Investments (Pty) Ltd	Makgobelelo Ward, Letlhakane P.O. Box 338 Orapa	Tel: 2976078 Fax: 2976078	Gladys Mothei
134	Muscat (Pty) Ltd	Haleys Comet Complex, Mmalekwa Ward, Kanye P O BOX Box 2845, Gaborone	Tel: 5442852 Fax: 5442852	Mrs. M. E. Kruger
135	My Guy General Dealers	Plot 93, Unit 6, Office 6Gaborone International Commerce Park	Cell: 72691865	Tlanelo Ramodisa
136	Nat-Gat (Pty) Ltd	P O Box 2426 Jwaneng	Tel: 73555872	Gadibotsile Modise
137	New waves Investments (Pty) Ltd t/a Camela	Plot 2068, Behind S Spar P O Box 2457, Mahalapye	Tel: 4720430	Ulinda Smit
138	Ngotwane Investments (Pty) Ltd	Barclays Plaza Office 44 Francistown P O Box 2057 Francistown	Tel: 2412858	Mbako Nfila
139	Nicho'sCashloan (Pty) Ltd	Tawana Ward,Letlhakane P O Box 599 Orapa	Tel: 2978133 Cell: 75518137	N. Moikwathai
140	North Star Enterprises (Pty) Ltd	Plot 13119, BBS Mall, Broadhurst P O Box 2845 Gaborone	Tel: 3933256 Fax: 3162102	Marthiam J. Ferreira
141	Northern Sparrow (Pty) Ltd	Plot 6144 Unit 15 Swap Complex, Francistown, P O BOX 1860 F/ Town	Tel: 2420836 Fax: 2417992	Patience lthuteng Samuel
142	Northring Complex (Pty) Ltd T/A NorthringCashloan	Blue Jacket Square, Office 105, First Floor, P O Box 301642 Francistown	Tel: 2404350 Fax: 2404350 Cell: 73357213	Gomotsang Rampart

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143 Notewise (Pty) Ltd	Lot 838-841, Blue Jacket Square, Shop 5A Francistown P/Bag F388 Francistown	Tel: 2417027 Fax: 2416474	Barend H. Verwey
144 Nuff Cashloans (Pty) Ltd	Suite 126, Plot 17950, Haile Selassie Road, Gaborone. PO Box V2094 Ramotswa	Tel: 3974637 Fax: 3974637	Kgomotso Nakedi
145 Nyika Investments (Pty) Ltd	The Mall 1ST Floor Serowe	Tel: 4638119 Fax: 4638119	Lorraine Bezuidenhout
146 Obmass (Pty) Ltd	Plot 171 Sowa Town P O Box 138 Sowa Town	Tel: 6213200	Obert Masilo
147 O'FM Investments (Pty) T/A Dlamini's Services	Plot 5415, Main Mall Jwaneng P O Box 210, Jwaneng	Tel: 5880604 Cell: 5880607	Victor Makuku
148 Express credit (Pty) Ltd	Fairgrounds Gabz FM Building Plot 64516 P O BOX 2322 AAD Gaborone	Tel: 3110937 Fax: 3160394	Onkabetse Mphoeng
149 Onma Investments (Pty) Ltd T/A GwiziCashloan	Town Center Building, Plot 6144, Guy Street, P.O. Box 2001 Francistown	Tel: 2418992 Fax: 2418991	Ontibile Peo
150 Ooslo Investments (Pty) Ltd	P.O Box 338 Orapa Letlhakane Village, Tawana Ward	Cell: 71417867	Thatayaone Lephodisa
151 Optic (Pty) Ltd	Molepolole Kgosing Ward Older COOP Building, P O Box 3622 Molepolole	Cell:72822415/ 71358026	Kabelo Regoeng
152 Zufire & Co (Pty) Ltd	Plot 54368 West Commercial Road ITowers – First Floor, Office 114 The Hub – CBD	Tel:3981925 Cell: 74090789	Michael Mandla Hirschfield
153 Pathways Business Ventures (Pty) Ltd t/a Pathfin	Office 43 Lot 4790 Electro House Gaborone Industrial P O Box 20812 Gaborone	Tel: 3934508 Fax: 3934508 Cell: 72114280	Collen Moses
154 Pectin Investments (Pty) Ltd	Unit 8 & 16B Carbo Centre Private Bag BR 154 Gaborone.	Tel: 3190680 Fax: 3190696	Gaone Malebogo Ketshabile
155 Pentagon Cross (Pty) Ltd t/a KPX	Unit 3 Floor 1 Beares Building, Lobatse, CBD P.O. Box 1072 Lobatse.	Tel: 5300188 Cell: 74949600	Kgosisekgabo Phoi
156 People's House Jwaneng (Pty) Ltd	Unit 10A Lot 5422, Diamond Mall Private Bag 73 Jwaneng	Tel: 5881611 Fax: 5881611	Paul Jacobs DuPlessis Kruger
157 Peubo Investments (Pty) Ltd	1st Floor-Office No.15 Plot 871/2/3/4 African Mall Babereki House P O Box 404341 Gaborone	Tel: 3105837 Fax: 3105745 Cell:73105745	Gofaone Johane
158 Phana Romic (Pty) Ltd	Cash Bazaar Holding Buildings First Floor Room 8 Selibe Phikwe P O Box 36340 Selibe Phikwe	Tel: 2610844 Cell: 71543769 Fax: 2610844	Kereeditse Marope
159 Phangwagwa Enterprises (Pty) Ltd t/a ADB Micro Lending	P.O. Box 905 Kasane	Tel/Fax: 6250935 Cell: 76433050	Tiny Chika
160 Phillodovica Cash Loan (Pty) Ltd	Plot 13969 Block 5 P.O. Box 1635 Francistown.	Cell: 72409553	Jeffrey Phillimon.
161 Polonic Investments (Pty) Ltd T/A PolonicCashloan	Tawana Ward, Plot 3674 Letlhakane P.O. Box77 Orapa	Tel: 2978120 Fax: 2978120 Cell: 71865997/73595176	Nicollet M. Morobane
162 Pomma (Pty) Ltd t/a Precise Wealth Cash Loan	Plot No. 171 Unit 10 Oasis Motel Tlokweng P O Box 3249 Gaborone	Tel: 3911822 Fax: 3911822	Joel Mothabane

Appendix 4N: List Of Micro Lenders

	NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
163	Powmo Investments (Pty) Ltd	Madikwe Ward Tutume P O Box 183 Tutume	Tel: 2987830	Matildah Mbenga
164	Puku Holdings (Pty) Ltd t/a Imali Cashloan	Shop No: 7 Teemane Mall P.O. Box 774 Jwaneng	Tel: 5881554 Fax: 5881553	William Hampton.
165	Pure Partners (Pty) Ltd	P O Box 944 Maun	Tel: 6863224	Moitse Popo Maruping
166	Quick Start Services (Pty) Ltd	Plot 529 Mophane Avenue, P.O. Box 839 Maun	Tel: 686 5566 Fax: 686 5566	Batshegi Sarefo
167	Rachelwa Investments (Pty) Ltd	Unit 4, Lot 17973, Setswana Print Complex, Gaborone West Industrial P O Box 504136 Gaborone	Tel: 3936046 Cell: 71268013 Fax: 3936046	Neo Gosekwang
168	Realdics (Pty) Ltd	2786 Office 7, Serorome Ward Palapye. P/Bag 007 Sefhare	Cell:72897746/ 75509564	Neo G. Modise
169	Reathusa (Pty) Ltd	Unit 1 & 2 First Floor, Plot No. 21328, Lobengula Avenue, P O Box 1204 Francistown	Tel: 2416392	Lucas J. Groenwald
170	Reeboz (Pty) Ltd t/a PromptDeal	FNB Complex, Shop NU 8, Old Mall, Palapye, P.O. Box 10653 Palapye.	Tel: 4900266	Caroline William
171	Reliance Holdings (Pty) Ltd	P O Box 1158, Francistown	Cell: 71483656 Tel :2415469	John Kgaje
172	Rise & Shine Budget Beaters (Pty) Ltd	Mafikana Ward, Kanye	Cell: 71232745	Lesole Katlholo
173	Robustic Investments (Pty) Ltd t/a Harmite Cashloan	Unit 5 Plot 6163 Swap Complex Nswasi Mall P O Box 500195 Francistown	Cell:77601986/ 74329946	Clara Boniface Phiri.
174	Rosherville Investments (Pty) Ltd	Plot 66 P O BOX 602400 Kanye	Tel: 5480426 Fax: 5480436	Kabelo Golekanye
175	Sapele Holdings (Pty) Ltd	Plot 2851 Block 8 P O Box 404027 Gaborone	Tel: 3924074 Fax: 3924074	Augustin Njei Acho
176	Sarakie Investments (Pty) Ltd T/A Sarakie Micro Lending	Plot 2891, Unit 4, Jwaneng P. O. Box 2303, Jwaneng	Tel: 71720000	Golebaone Keitshokile
177	Sebatex Investments (Pty) Ltd	West Ward, Commercial Plots, Pitsane P O Box 463 Kanye	Cell: 73466643/ 72192858	Tshepo Motse
178	Sentle Central (Serowe, Palapye	Barhnot Complex, Near Markus Filling Station, P O Box 839 Maun	Tel: 6870032 Fax: 6861656	David Nicolaas Van Rensburg
179	Sentle Investments (Pty) Ltd	Barhnot Complex, Near Markus Filling Station, P O Box 839 Maun	Tel: 6870032 Fax: 6861656	David Nicolaas Van Rensburg
180	Sibonda Investments (Pty) Ltd	Plot 15988 Ledumang P O Box 504220	Tel: 3924968	Ephi Simon
181	SilverDollar Investments (Pty) Ltd	Plot 685 Botswana Road, Main Mall Gaborone, Private Bag 00467 Gaborone	Tel: 3906581 Fax: 3906561	Bonita Smit
182	Sizewell (Pty) Ltd	Plot 1268, Thusanyo House, Old Lobatse Road, Gaborone West Industrial P O Box 602400 Gaborone	Tel: 3902873 Fax: 3902873	Jason Craven Smith

Appendix 4N: List Of Micro Lenders

	NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
183	Sloca Enterprises (Pty) Ltd T/A Bonno CashLoans	Plot 17854 Unit 2, Tshipidi House P O Box 405222 Gaborone	Tel: 3926986 Fax: 3916325 Cell: 716244334	Kerwele Carol Seloilwe
184	Smartribe (Pty) Ltd	P. O. Box 502793, Gaborone	Tel: 3918857	Bontle Charles
185	Sonaga Investments (Pty) Ltd	Plot 16186, Unit 5 NBC Developments Blue Jacket Street P/Bag F150 Francistown	Tel/Fax: 2416917	Mpho Sethole
186	Spicewekz Cash Loan (Pty) Ltd	Xhosa 2 Ward P.O. Box 2018 Mahalapye	Tel: 4712725 Fax: 4712726	Kesogofetse Tshegang
187	Stims Enterprises (Pty) Ltd	Plot 1225, Unit 8 Haile Selasie Road, Gaborone	Tel: 3111592	Mamello Ramakele
188	Sunset Letsatsi (Pty) Ltd t/a Boop Kono Cashloan	Plot 2576 CB Building Unit 8 Block 4 P.O Box 2012 Selebi-Phikwe	Tel: 2615506 Fax: 2615503 Cell: 71449669	Boitumelo Magibisela
189	SureChoice Botswana (Pty)Ltd	5 Matante Mews, Plot 54373,CBD, Private Bag 19 Gaborone	Tel: 3932443 Fax: 3932654 Cell: 71334195	Andre Heunes
190	Suzu- Rih Enterprises (Pty) Ltd t/a Immediate Cashloan	Serorome Ward Palapye P O Box 1426 Palapye	Cell: 75202673/ 71521537	Resego Mpule
191	Sytic (Pty) Ltd	Lot 50667, Unit 1 , Fairgrounds Office Park, Gaborone, Box 2639, Gaborone	Tel: 71547830	Tebogo Moribame-Setiko
192	Tanapo Investments (Pty) Ltd T/A BroliCashloan	Fastlane Premises, Reserura Ward, Pilane, P O BOX 1954 Mogoditshane	Tel: 5750053 Fax: 5750054 Cell: 74513712	Elizabeth Tiroyamodimo
193	Tellimark Investments (Pty) Ltd	Kanye Brigade Offices, Office No. 6, Kanye Mall, Box 11757 Kanye	Cell: 73939891	Johannes P. Suping
194	The Feel Bay Investments (Pty) Ltd	Plot 24538 Gaborone West	Cell: 71847270/74639449/ 76247729	Kagiso David Motswagae
195	Thitma Quantum (Pty) Ltd	Mokgobebele Ward Letlhakane P O Box 1693 Orapa	Tel: 2978143	Portia Petso
196	Thito Holdings (Pty) Ltd	Plot 5624, Real Estate Park, Broadhurst Industrial, Lejara Road P.O.Box 404515 Gaborone	Tel: 3909319 Fax: 3902025	Kgomotso Kgabi
197	Tide Waters Investments (Pty) Ltd	Tawana Ward Letlhakane P O Box 338 Orapa	Tel: 2978636 Cell: 71417867/71628797	Temo Ratsie
198	Kerediretse Tiego t/a Tiego's Cash loan	P O Box 301470 Francistown	Tel: 71683449 Fax: 2442076	Kerediretse Tiego
199	Tietic Investments (Pty) Ltd	Plot CBD 3746 Extension 2,Jwaneng	Cell: 73432792/ 74242027	Thuso Peter Ramono
200	Top Ted Investments (Pty) Ltd	Gasiko Ward, Gabane Plot number 2985	Tel: 72556618	Tlhagiso Ernest Dintwe
201	Tose Enterprises (Pty) Ltd	Tawana Ward Letlhakane P O Box 181 Orapa	Cell: 75145768	Portia Tabona
202	Traceline (Pty) Ltd	Plot 54483 Molapo Business Centre P O Box 47419 Phakalane	Tel: 3957430 Fax: 3957430	Joseph Hall
203	Trash Cash Loan	Mokgobebele Ward P.O. Box 255 Mopipi	Cell: 75972885	Kebofilwe Kelattheletswe

Appendix 4N: List Of Micro Lenders

	NAME OF MICRO LENDER	ADDRESSES	TEL/FAX	CONTACT PERSON
204	Tshepo Mosinyi T/A Ezweleni Cash Loan	Office 3 Lot 8934 Extension 2 African Mall, P O Box 601501 Gaborone	Tel: 3132952 Cell: 72660353	Tshepo Mosinyi
205	TU loans (Pty) Ltd	Plot 126 Unit 18 Gaborone International Finance Office Park Kgale Court Private Bag 19 Mogoditshane	Cell: 76102712 Tel: 3973644	Martin De Kock
206	Tuck and Turner Enterprises (Pty) Ltd	P.O. Box 1279, Letlhakane	Tel: 71988239	Topololo C. Modiri
207	Tudumase (Pty) Ltd	Plot 2564 P O Box 350083 Maun	Cell: 74370948	Tudueto Masene
208	Tuk-Tuk Botswana (Pty) Ltd	Plot 54368 Ground & First Floor The Hub iTowers Gaborone CBD, P O Box 4896 Gaborone	Tel: 3981923 Fax: 3981901	Abueng Jenamo
209	Twinkle Waves (Pty) Ltd	Plot 1094, Embassy Chambers, Unit 4, Main Mall, Gaborone, P. O. Box 1929, Mogoditshane, Gaborone	Cell: 72642865/ 71269580 Fax: 3917723	Thibela Setimela
210	Versagold (Pty) Ltd t/a Day Service Cash Loan	Plot 37483, Block 8 Gaborone	Tel: 3112890	Francis Seelo
211	Wakalevike (Pty) Ltd	Ikago Business Enclave Plot 114 Tawana Ward, P O Box 3424 Letlhakane	Cell: 72605217/ 72294694	Wame Jimson
212	Watdon (Pty) Ltd t/a NK 2011 micro lenders	Lotsane Ward Palapye P O Box 11419 Palapye	Tel: 4970100 Fax: 4970101	Donald Seko Nkete
213	Whitsun (Pty) Ltd t/a Yours and Mine	Plot 2577 Unit 6 CB Building Cash Bazaar Selibe Phikwe P O Box 1095 Selibe Phikwe	Tel: 2614786 Cell: 72620782	Tabona Elias
214	Wallet Care (Pty) Ltd	Shop 23, KB Mall Gaborone	Tel: 3113877 Cell: 75980301	Tshepiso Arrisa

Appendix 40: List of Exempted Pawnshops

COMPANY NAME	LOCATION	PLACE OF BUS	TELEPHONE	CONTACT PERSON	STATUS
Freeman Pawnshop	Gaborone	P O BOX 150152, Mogoditshane	3165441	Benjamin K Boadi	Exempted
Two Plus One Pawn Shop	Francistown	Plot 31071, Francistown	2413231/ 71612761	Christopher Musa	Exempted
Abuti,s Pawn Shop	Gaborone	"Plot 8354 Lenganeng, Tlokweng"	3121260/ 3973157	D O Boateng	Exempted
Bright Pawn Shop	Francistown	Plot 9433, Block 2, Francistown	74273811	Gabaithuti Mafoko	Exempted
Anthoniorose (Pty) Ltd	Gaborone	Plot 320, Mogoditshane	73554796/ 76123402	Prof Abosi	Exempted
Kagiso Pawn shop (Pty) Ltd	Gaborone	Box 1733, Mogoditshane		Michael T. Ahulu	Exempted
Petrous Investment (Pty) Ltd	Seleka	Seleka, Private Bag 0039 Seleka	72417587/ 73887382	Petrous Tshabang	Exempted
Resostore (Pty) Ltd	Palapye	Serorowe Ward Palaye P. O. BOX 10062 Palapye	74101783/ 72146060	Koziba Oitsile	Exempted
City Pawn Shop	Gaborone	P. O. BOX 211173, Gaborone	3133812	Sarah Adakwa	Exempted
Loapi Pawn Shop (Sober Deals Investments) (Pty) Ltd	Gaborone	P. O. BOX 60234 Gaborone	71601217	Onkabetse Mogae	Exempted
Gracious Concept	Gaborone	Plot 2887 Unit 1B Ext 10 PO BOX 503236 Gaborone	73958662	Boyce Ngwako	Exempted
Bojanour Pawn Shop	Francistown	Extension 5465Francistown Francistown, P.O. Box 2729	77145416	Bongani Solomon	Exempted
Ben Pawn Shop	Gaborone	Bontleng Tlokwelo P O BOX 201366	71494592/ 76153883	Benjamin Kwarare	Exempted
Thari ya Ngwana Centre Pawn Shop	Serowe	P.O Box 2633 Serowe	71746582	Basimolodi Gabaikannngwe	Exempted
Town Brand (Pty) Ltd.	Gaborone	Kay Selina Ogenna P O. Box 53255, Gaborone	76854455/ 74544512	Selina Ogenna	Exempted
Nomek Holdings (Pty) Ltd	Lobatse	Ishmael Chukwuemeka Nwosu, P O BOX 792 Lobatse	73965391	Ishmael Chukwuemeka Nwosu	Exempted
KG Aabobe Investments (Pty) Ltd	Gaborone	Plot 8305,Tlokweng, Gaborone, P O Box 403220 Gaborone	72337492	Kagiso Aobobe	Exempted
Jatinwa Investments (Pty) Ltd t/a Jatinwa Pawn Shop	Palapye	P. O. Box 594, Palapye	71630274/ 71697685	Jane Nwako	Exempted
Daniel Miracle Holdings (Pty) Ltd	Serowe	P O Box 3253, Serowe	73287694/ 74146356	Daniel Ugachukwu Iwuchukwa	Exempted
Ikyco Investments (Pty) Ltd	Selibe Phikwe	P O Box 2559, Selibe Phikwe	71430609/ 72503309	Innocent Nwosu	Exempted

Appendix 40: List of Exempted Pawnshops

COMPANY NAME	LOCATION	PLACE OF BUS	TELEPHONE	CONTACT PERSON	STATUS
Ndozy Sir Holdings (Pty) Ltd	Gaborone	P O Box47350, Gaborone	72155688	Jean-Marie Kabalisa	Exempted
Jobest Holdings (Pty) Ltd	Selebi Phikwe	P O BOX 2679, Selibe Phikwe	71925082	James Nwosu	Exempted
Blue Steel (Pty) Ltd	Francistown	P O Box 3179, Francistown	71973878/ 71207660	Michelle Blasco Jungo	Exempted
Ikago Property Holdings (Pty) Ltd	Lethakane	P O Box 580 Lethakane	71303884, 71301230	Tshekatsheko Setlhom	Exempted
Novel Vision Projects (Pty) Ltd t/a Pula Pawnshop	Gaborone	P O Box 26344 Gaborone	71676989	Lekgotla David Mmakgotso	Exempted
Green Flap (Pty) Ltd t/a GF Pawnshop	Gaborone	P O Box 25ABF, Gaborone	75952906/ 75952905	Giveus Mathe	Exempted
G_Amour Investments (Pty) Ltd	Gaborone	P O BOX 47567, Gaborone	73222111/ 74280870/ 3934523	Tebogo Moshashane	Exempted
Lient Pawn Shop (Pty) Ltd	Gaborone	P O Box 2661, Gaborone	71262558/ 73545485	Mpho Keboathloetswe	Exempted
Tulpwood Investments (Pty) Ltd t/a Full Moon Pawn Shop	Francistown	P O Box 500223, Francistown	75976537/ 77141386	Cynthia Nswazwi	Exempted
Thobela Pawn Shop	Gaborone	P O BOX V2094, Gaborone	71685639/ 3974637	Kgomotso Nakedi	Exempted
Cash Crusaders (Pty) Ltd	Gaborone	P/Bag 351, Suite 498 Gaborone	3910801	Herman Kitshoff	Exempted
Baymol Investments (Pty) Ltd t/a Bassie Pawn Shop	Gaborone	P O Box 211316, Bontleng	71698232	Bassie	Exempted
Wellness Consultants (Pty) Ltd t/a First Supply	Gaborone	P O Box 81896, Gaborone	3911943	Andrew Tlokwe	Exempted
Melikh Pawn Shop (Pty) Limited	Francistown	P O Box 2621, Francistown	71443397/ 76239416	Matntsee Kuswani	Exempted
Pawn It (Pty) Ltd	Gaborone	P O Box 46750, Gaborone	3918724/ 71804680	Reuben Kaizer	Exempted
Moosad Group (Pty) Ltd t/a Last Dice Pawn Shop	Jwaneng	Private Bag 12, Jwaneng	71785597/ 73529598	Israel Kgosidiile	Exempted
Med-tint group (Pty) Ltd	Gaborone	P O Box 211395, Gaborone	3931969/ 71449971	Magare Masilonyane	Exempted
Hartlane projects (Pty)	Gaborone	P O Box 1202, Gaborone	71723891/ 75704521	Berandon Bakwena	Exempted
Smega Investments (Pty) Ltd	Gaborone	P O Box 82277, Gaborone	72445289	Pako Nchupetsang	Exempted
Othugeoff (Pty) Ltd t/a Pen & Geof pawnshop	Maun	P O BOX 20348, Maun	72559713/ 6861038	Othusitse Sekeletu	Exempted
Easy way out Pawnshop	Gaborone	P O Box 70802, Gaborone	73901666/ 71510616	Kindwani Chatsama	Exempted

Appendix 40: List of Exempted Pawnshops

COMPANY NAME	LOCATION	PLACE OF BUS	TELEPHONE	CONTACT PERSON	STATUS
Elijah Pawnshop	Ramotswa	P O Box 492, Tobane	71642523/ 74933277	Baboloki	Exempted
Fair Deal Pawn shop (Pty) Ltd	Gaborone	P O Box 601148, Gaborone	71282621/ 76548013	Benny Selebe	Exempted
Sacals (Proprietary) Limited	Maun	P O Box 366, Maun	76031523/ 71237031	Hlompho Sentsho	Exempted
Springle Front logistics (Pty) Ltd	Mahalapye	Private Bag 001, Mahalapye	71977997/ 72570608	Kekgabile Tshoko	Exempted
Zanny OEE (Pty)Ltd	Gaborone	P O Box 635, Gaborone	73136655/ 3121178	Zannel Sealotsa	Exempted
Kolojane Holdings	Otse	P O Box 229,Otse	71743074/ 72975773	Kgosietsile Kolojane	Exempted
Lanny Holding Pawnshop	Gaborone	P O Box AD 782 ADD, Gaborone	76000069/ 3167168	Kim Lanny	Exempted
Cash Ride Pawnshop	Gaborone	P O Box 501618, Gaborone	3936649	Morulaganyi Tshitoeng	Exempted
Lacox Holdings (Pty) Ltd	Francistown	P O Box 153, Francistown	72169425/ 76684536	Siphiwe Cox	Exempted
Top Ten Hair Salon	Gaborone	P O Box 201888, Gaborone	72393081	Frimpong Therisanyo	Exempted
Boileng Multi Constructions (Pty) Ltd	Maun	P O Box 151, Maun	73841846/ 72841846	Kgosietsile Kebuileng	Exempted
Martim (Pty) Ltd	Gaborone	P O Box 1243, Gaborone	72105137	David P Muir	Exempted
Lizah's pawnshop	Palapye	P O Box 65, Palapye	71520570/ 72783656	Kgotlaetsile Omphemetse	Exempted
Water Solution Mining Botswana (Pty) Ltd	Gaborone	P O Box 598 AEH, Gaborone	72879172	Kabelo Mohohlo	Exempted
Rhomma Hodlings (Pty) Ltd	Gaborone	P O Box 1544 ABG, Gaborone		Victoria Nkokwe	Exempted
Ethical Supremacy Investments (Pty) Ltd	Francistown	P O Box 3314, Francistown	72475702	Antony Kenosi	Exempted
Naibosa Investments (Pty) Ltd	Gaborone	P O Box 503124, Gaborone	74787525/ 71425136	Setswakae Nagole	Exempted
Unifocus Investments (Pty) Ltd	Francistown	P O Box 36103, Francistown	77189385/ 75776247/ 2417300	Stephen Machinya	Exempted
KG John Investments (Pty) Ltd	Francistown	P O Box 1158 Francistown	2415941/ 71483656	John Kgaje	Exempted
Frontier Pawnshop	Gaborone	P O Box 229, Gaborone	73495494/ 77024047	Gaone Keoagile	Exempted
Dynex Two Pawnshop	Palapye	P. O. Box 1074, Palapye	75419884	Julia Mosinki	Exempted

Appendix 4O: List of Exempted Pawnshops

COMPANY NAME	LOCATION	PLACE OF BUS	TELEPHONE	CONTACT PERSON	STATUS
Donwel (Pty) Ltd T/A Cash-X-Change Pawn Broker	Gaborone	P. O. Box AD 102, Mogoditshane	76763161	Ipotseng N. Keleofile	Exempted
Weverly Holdings (Pty) Ltd T/A Weverly Pawn Shop	Gaborone	P. O. Box 73 ABE, Postnet Broadhurst, Gaborone	76000350	Obi Chigbo Ngwigbo	Exempted
Core Matrix (Pty)Ltd T/A core matrix pawn shop	Gaborone	P.O.Box 41, Molepolole	72894292	Johannes January	Exempted
Empire State (Pty)Ltd T/A Exchange Pawnshop	Gaborone	P.O.Box 53470 Gaborone	72680891	Lebegang Sebusang	Exempted
Overseas Group (Pty) Ltd	Francistown	PO Box 11135 Tatitown,Francistown	75504035/ 74695574	Thato Dikgakgamatso	Exempted
Green Pass Tradings (Pty) Ltd	Gaborone	P.O Box 301195, Tlokweng	75537780/ 71267780	Thatayaone Mokobi	Exempted
The Elect PawnShop (Pty) Ltd	Gaborone	PO Box 345, Gaborone	74419890	Khumo James	Exempted
Lanny Capital (Pty) Ltd t/a Pawn Express	Gaborone	P.O. BOX AD 782 ADD, Gaborone	76000069	Kim Lanny	Exempted
Purple Bee (Pty) Ltd t/a Perfect Peace Pawnshop	Mogoditshane	P.O. Box 82013, Gaborone	72612522	Emmanuel Ansu/ Sherry T. Ntshole	Exempted
Lowani Investments (Pty) Ltd	Mmopane, Block 1	P.O. Box 477 BCR, Mogoditshane	7322 7759/ 7462 0496	Tshenolo Mabone	Exempted
Kleinview Holdings (Pty) Ltd	Mogoditshane	P. O. Box 4390, Gaborone	76374797	Bofelo Ngake	Exempted
The Almo Services (Pty) Ltd	Mahalapye	P O BOX 1705, Mahalapye	77057711	Kebaabetswe Phuthego	Exempted
Team Fusion t/a Prestige Pawnshop	Metsimotlhabe	P O Box 2095 Gaborone	72932898	Tebogo Ramaloko	Exempted
Longest Group (Pty) Ltd T/A Wealthy Pawn Shop	Tlokweng	P O Box 301676, Tlokweng	74178147	Pelonomi Gabosekwe	Exempted

Appendix 4P: List of Exempted Finance Companies

NAME	CONTACT PERSON	ADDRESS	TELEPHONE
African Gateways (Pty) Ltd	Victor Wilfred Mpai	wilfredmpai@gmail.com	Tel: 3980379 Cell: 71311777
Caftan (Pty) Ltd	Shaun Sello	shaun@caftan.co.bw	Tel: 3925344
Capital Masters Holdings (Pty) Ltd	Khumoetsile Nawa	capitalmastersbw@gmail.com	Cell: 73599262/71493184
Capital Value (Pty) Ltd	Nikunj Mehta	nikunjmehta@gmail.com	Tel:3181512
Empire State (Pty)Ltd T/A Empire firm	Lebegang Sebusang	empirestatefirm@gmail.com	Cell: 72680891 Tel: 3933912
Export Credit Insurance & Guarantee Company Botswana (Pty) Ltd	Harold Kuvenga	Haroldk@beci.co.bw	Tel: 3188015 Fax: 3188017

Appendix 4P: List of Exempted Finance Companies

NAME	CONTACT PERSON	ADDRESS	TELEPHONE
Fima Enterprises (Pty) Ltd	Itumeleng Ednah Maphongo	itumelengm@fimacapital.co.bw	Tel: 3938359 Cell: 71636252
Kemello Group (Pty) Ltd	Tiholego Mugomba	tlholegomogapi@yahoo.com	Cell: 75002552/71209483
KhenJully Holdings (Pty) Ltd	Julie Mmabasadi Keaosentse	Khenjully2012@gmail.com julliekeosentse@yahoo.com	Tel: 71879961/75731576
Ladude Invet t/a Ticano Strategy and Pro	Opelo Tiro Motswagole	calvomoppie@yahoo.co.uk	Cell: 76922999 Tel: 3618280
Langford Holdings (Pty) Ltd t/a Langford and David	D.S Ngwanaamotho	Langford390@gmail.com	Tel: 72972022
Lanny Holdings (Pty) Ltd	Amantle Monametsi	ama@lanny.co.bw kim@lanny.co.bw	Tel: 3167186 Cell: 71853030
Letshego Financial Services	Mr. Lawrence Ntshabele	lawrencen@letshego.com	Tel: 3643312 Cell: 72290553
Lupos Investments (Pty) Ltd T/A Lupos Capital	Uyapo Letsholo	sidouyapo@gmail.com	Cell: 72473303 Tel: 3186679
MaxAur Marketing Services	Martin Ragontse	martinr@mams.co.bw	Tel: 391 2079
Mic Fin (Pty) Ltd	Thembisile Phuthego	tphuthego@btcmil.co.bw kennedy@creditfactors.co.bw	Tel: 3910243/4 Cell: 72100812
Moitiri Capital (Pty) Ltd	Maureen Makati	maureen.makati@moitiricapital.co.bw	Tel: 3907020
Moola Group (Pty) Ltd t/a Moola Capital	Mrs. Mpho Donnell	moolafinance@gmail.com	Cell: 77793900 Tel: 3933785
MyGuy General Dealers (Pty) Ltd	Tlanelo Ramodisa	tlaneloramodisa@yahoo.com	Cell: 72691865
Norsad Finance Ltd	Jonathan Davies	jonathan.davies@norsadfinance.com	Tel: 3160860
Olympia Factors Commerciale (Pty) Ltd	William Mwirisi	William.murwisi@gmail.com	Cell: 75458855
Profirst (Pty) Ltd	Nthisana M Phillips	Profirst.investments@gmail.com	Tel: 3909228
Savanna Land (Pty) Ltd	Martin Tini Silongo	Info.savannaland@gmail.com	72912792/3114788
Sytic (Pty) Ltd T/A The Cash Source	Tebogo Setiko-Moribame	tebogomoribame@gmail.com	Cell: 71381410
Topmarket Capital (Pty) Ltd	Pauline Gagoitseope	pauline@topmarketcapital.co.bw	Cell: 72666616 Tel: 3162642
VBP Home Investments (Pty) Ltd	Anthony Siwawa	bakani@venture-p.com	Tel: 3181012 Fax: 3181038
Versagold (Pty) Ltd	Francis Seelo	francisseeelo@gmail.com	71305512/3115640
Water Solutions Mining Botswana (Pty) Ltd	Kabelo N. Mohohlo	Kabelo.wcmb@gmail.com	Cell: 72879172 Tel: 3190895
Ecsponent Projects (Pty) Ltd	Andre Heunes	Andreh2211@gmail.com	Tel: 3918754 Cell: 71334195

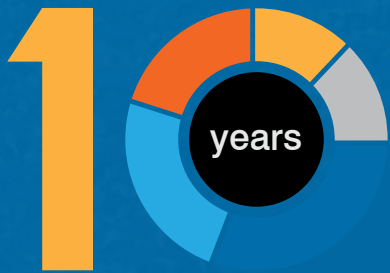
Appendix 4Q: List of Exempted Leasing Companies

NAME	CONTACT PERSON	ADDRESS	TELEPHONE
Empire State (Pty)Ltd T/A Empire firm	Lebegang Sebusang	empirestatefirm@gmail.com	Cell: 72680891 Tel: 3933912
Kemello Group (Pty) Ltd	Tiholego Mugomba	tlholegomogapi@yahoo.com	Cell: 75002552/71209483
Ladude Invet t/a Ticano Strategy and Pro	Opelo Tiro Motswagole	calvomoppie@yahoo.co.uk	Cell: 76922999 Tel: 3618280
Mic Fin (Pty) Ltd	Thembisile Phuthego	tphuthego@btcmil.co.bw kennedy@creditfactors.co.bw	Tel: 3910243/4 Cell: 72100812
Scania Finance Southern Africa (Pty) Ltd	Bruno de Mattos	Nicolette.james@scania.co.za	Tel: 3912244



Appendix 4R: Medical Aid Players - Contact Details

ENTITY NAME	CONTACT PERSON	TELEPHONE	POSTAL ADDRESS
Botlhe Medical Aid Scheme	Mr. Gotsilekgosi Gagosi	3132465	Private Bag BR 143, Gaborone
Botswana Medical Aid Society (Bomaid)	Mr. Moraki Mokgosana	3633100	P. O Box 632, Gaborone
Botsogo Health Plan	M. Lesego Pule	3624700	Private Bag 00391, Gaborone
Botswana Public Officers Medical Aid Scheme	Mr. Thulaganyo Molebatsi	3972418/71784230	P O Box 1212 Gaborone
Doctors (Pty) Ltd T/a Doctor's Aid Medical Aid Scheme	Dikgato Derrick Tlhowe	3904924/ 73737373	P O Box 70587, Gaborone
Pula Medical Aid Fund	Dr. Thato Moumakwa	3650500	P O Box 1212, Gaborone
Call A Doctor (Pty) Ltd T/a Itekanele Health Scheme	Mr. Solly Reikeletseng	72869999	Private Bag 00208, Gaborone
Wastikc Consortium (Pty) Ltd T/A Etudiant Medical Aid	Mr. Kabo Letlhare Wastikc	76879202	P. O Box 530 BCR SSKB Gaborone



“Continuing to do more; A decade of financial stability”

INBFIRA
NON-BANK FINANCIAL INSTITUTIONS
REGULATORY AUTHORITY

2010 ANNUAL REPORT

Annual Report
2014



ANNUAL REPORT
2015

INVESTMENT

NBFIRA reflects on its first ten years of operation

to 31 March 2018



2016
ANNUAL
REPORT



3rd floor Exponential Building
Plot 54351 CBD, Off PG Matante Road
Gaborone
Private Bag 00314, Gaborone, Botswana
Tel: +267 310 2595 / 368 6100
Fax: +267 310 2376 / 310 2353
Website: www.nbfira.org.bw



Dear Valued Stakeholder

It is my privilege and honour to present highlights of **the Regulatory Authority's** journey since its establishment in 2008. The NBFIs regulated by NBFIRA operated for the most part of the last 10 years in a low growth and subdued inflationary environment both domestically and in the international financial markets. It is on this background that we report the developments in the NBF sector over the past decade.

The Regulatory Authority has developed a financial sustainability strategy with a view of achieving self-financing in the long-term; viz, less reliance on Government financing of its operations and more self-financing primarily through the collection of supervisory levies. We also present a synopsis of NBFIRA's financial performance over the review period.

This section is followed by a reflection of NBFIRA's ten year journey in the execution of its mandate and the developments that took place in the various industries and / or departments.

Yours sincerely,

Oaitse M. Ramasedi (Mr)
Chief Executive Officer

NBFIRA TIME LINE OF MAJOR EVENTS

Date	Event Description
2006	Promulgation of NBFIRA Act, 2006
2007	Inaugural Board Appointments
2008	Commencement of NBFIRA Operations outside MFED.
2009	Publication of the first NBFIRA Annual Report celebrating, inter alia, the development of layman's draft of the Micro-lending regulations
2011	A sub-committee of the Board – the Finance and Audit Committee- (FAC) was set up. Development and implementation of the 2010-2013 Strategic Plan
2012	A sub-committee of the Board – the Human Resource Committee (HRC) was set up. Implementation of Prudential Rules for insurance, retirement funds and capital markets. Promulgation and commencement of the Micro lending Regulations, 2012
2013	Development and implementation of the 2013 – 2016 Strategic Plan Launch of the NBFIRA brand.
2014	Establishment of the Research Department to lead in market research in order to provide insights into the developments of the NBFI sector. NBFIRA hosted CISNA bi-annual meeting Parliament passes the Securities Act, 2014 Parliament passes the Retirement Funds Act, 2014.
2015	The Risk Based Supervisory System (RBSS) was launched. The project was co-sponsored by the African Development Bank and the Regulatory Authority. Parliament passed the Insurance Industry Act The Enterprise Resource Planning (ERP) System was launched. The Intranet aka Lekgotla was launched for internal communications
2016	The NBFIRA Act, 2016 commenced and the NBFIRA Act, 2006 was repealed. Development and Implementation of the 2016-2021 Strategic Plan
2017	Commencement of the Retirement Funds Act, 2014; Securities Act, 2014 and their supporting Regulations. The Board established the Licensing and Enforcement Committees (LEC) AML/CFT Department was established Fit and Proper Rules were implemented. The Risk Management Department was established in pursuit of the Regulatory Authority's operational efficacy in maximizing enterprise-wide risk management. The internal audit function was in sourced and an Internal Audit Department established.

DEVELOPMENTS IN THE LEGAL AND ENFORCEMENT FUNCTION

The Regulatory Authority, in 2012, took a decision to centralise and specialise the provision of legal services, which services include the provision of legal advice, the drafting and review of legal agreements, service level agreements and memoranda of understanding, as well as providing input in the development of legislation governing the non-bank financial sector. Prior to 2012, **the Regulatory Authority** outsourced its legal function to external legal counsel.

Through the years, **the Regulatory Authority** increased its legal specialist human resources, standing with a complement of six (6) staff members, in line with the organisational structure, from one (1) staff member.

Enforcement

In consequence of increasing its capacity, **the Regulatory Authority** further centralised the enforcement of financial services laws on the entities it regulates in 2015. Enforcement services constitute **the**

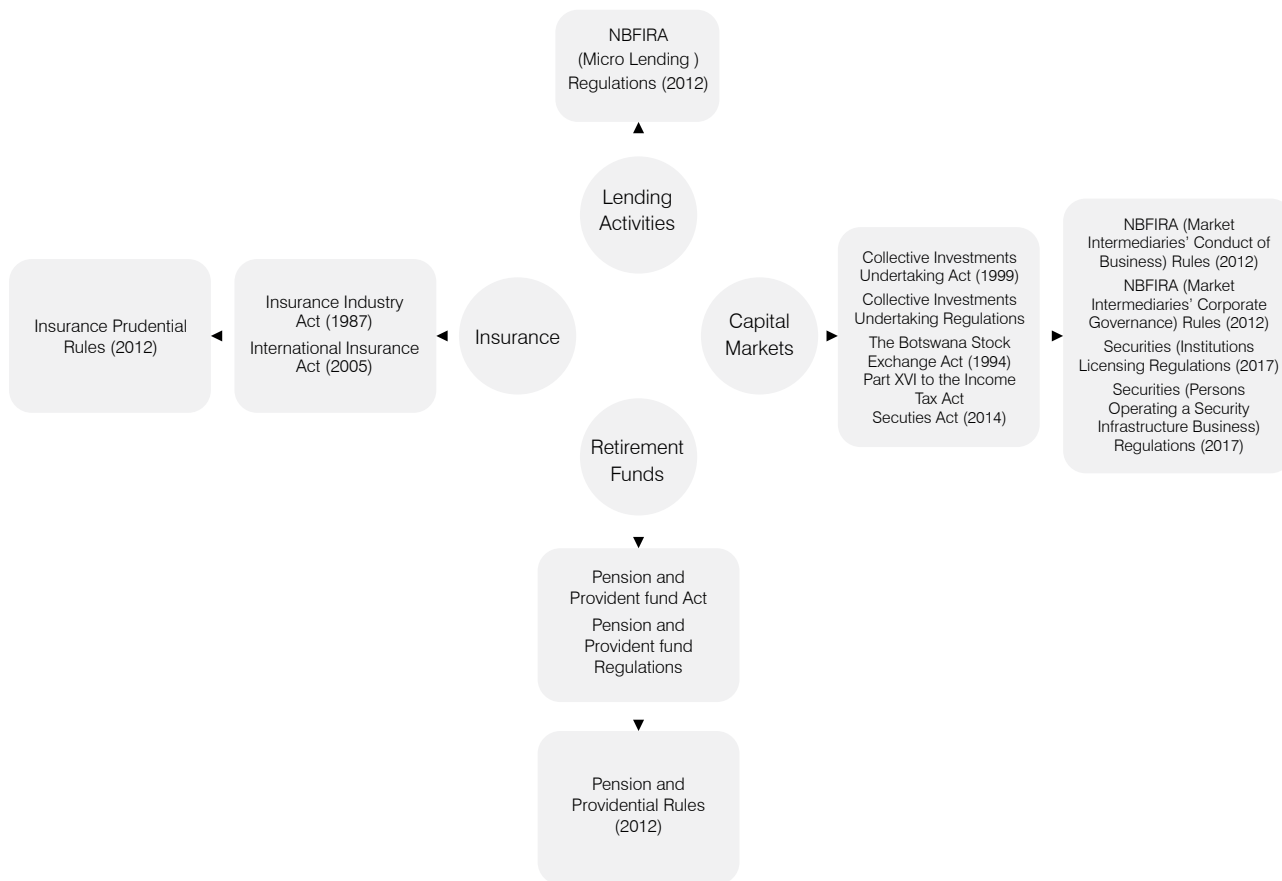
Regulatory Authority taking appropriate action against NBFIs which are in breach of the requirements issued to them in line with relevant statutes.

Legislative Developments

The Regulatory Authority has continued to assist in the development and improvement of the legislative frameworks governing both itself as well as the NBFIs which it regulates. At its commencement, **the Regulatory Authority**, utilized the NBFIRA Act (2006), which established it and gave it its mandate.

The NBFIRA Act (2006) was repealed and replaced with the NBFIRA Act (2016), which commenced in October 2016. The NBFIRA Act (2016) is structured to deal with the organization's operational issues, while the aim is to have all the regulatory provisions captured under the relevant industry specific legal frameworks.

In addition to the NBFIRA Act, the Regulatory Authority assisted in the implementation of the following:



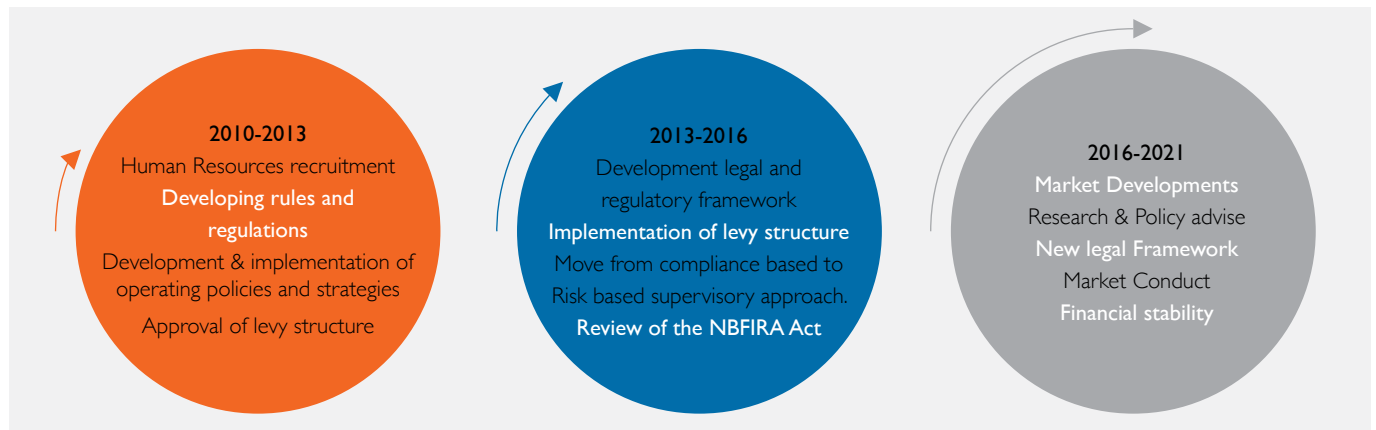
THE NBFIRA STRATEGY TRAJECTORY

Since starting operations in 2008, **the Regulatory Authority** has developed three (3) Strategic Plans. Two (2) were 3-year Strategic Plans implemented consecutively. They reflected the infancy of the Regulator and focused on priorities aimed at creating an enabling framework for operations. Over time, the non-bank financial sector has changed considerably, with an increasing complexity and breadth of challenges facing **the Regulatory Authority**, amongst others, money laundering and terrorist financing risks. The third and current Strategic Plan, which runs for five (5) years, from 2016 to 2021, was crafted to

respond to these challenges and risks, focusing on ensuring a robust and flexible organization.

Figure 1 depicts the key strategy focus areas for each Strategic Plan over the years, a reflection of the maturity levels of **the Regulatory Authority**, as well as the unique challenges in the environment during the different strategic planning periods. Notwithstanding these, the Authority has made significant progress in implementing and achieving its strategy over the years

NBFIRA Strategy Trajectory



DEVELOPMENTS IN THE ENTERPRISE RISK MANAGEMENT

The Regulatory Authority established the Risk Management Department in 2016 since then, there has been significant improvements on the risk management landscape. **The Regulatory Authority** has developed the Enterprise-wide Risk Management Framework, Risk Management Policy and Risk Management Strategy.

The Regulatory Authority's risk management strategy is to become a Risk Intelligent enterprise. Moderate strides have therefore been accomplished. As at March 31, 2018, the Risk Maturity Assessment revealed that **the Regulatory Authority** was at Systematic Level (4th

level out of 5 levels), with 5th level being the highest. At this level, the following activities were achieved in managing the risk profile:

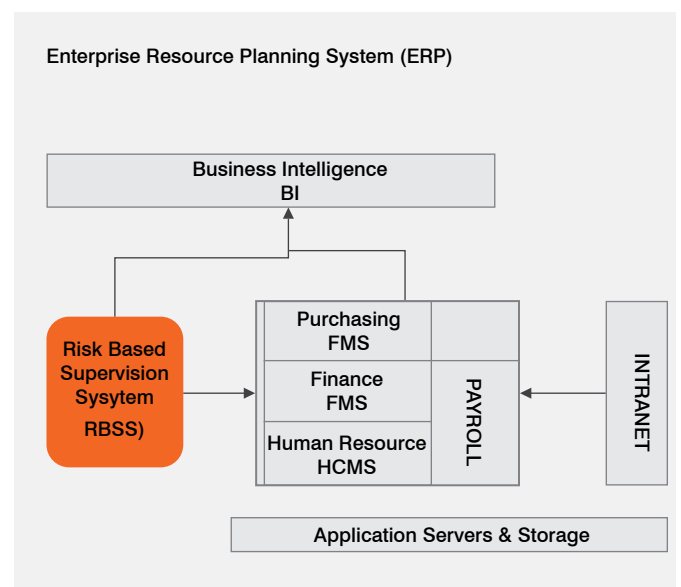
- Coordination of risk management activities across the departments;
- Risk appetite is fully defined;
- Enterprise-wide risk monitoring, measuring and reporting is executed in line with the risk framework;
- Dedicated risk team is in place;
- There is knowledge sharing across the risk functions;
- Communication of strategic risks to the Board; and
- Risk Management training is in place.

DEVELOPMENT OF INFORMATION TECHNOLOGY

The Regulatory Authority leveraged on available information technology since its inception in 2008. In the first years, **the Regulatory Authority** set up the basic infrastructure to facilitate file sharing and electronic mail services. On this note, only two servers were provided for file server and mail services respectively. Further, **The Regulatory Authority** developed the Information Technology Strategy to guide the Authority in the coordinated deployment and exploitation of Information Technology which will result in business being conducted in an efficient and effective manner.

In the subsequent years, **the Regulatory Authority** developed and implemented a risk based supervisory system to enhance the data handling in an integrated fashion in order to dynamically know the status of all the regulated entities. The system has a data management centre and allows entities to submit their returns online. In addition, **the Regulatory Authority** in its quest to become digitally driven developed and implemented an an Enterprise Resource Planning (ERP) system for an integrated automation of the Finance, Human Resources and Payroll processes. The project also included the implementation of the Intranet as a collaboration tool and Business Intelligence for data mining, analytics and reporting tool.

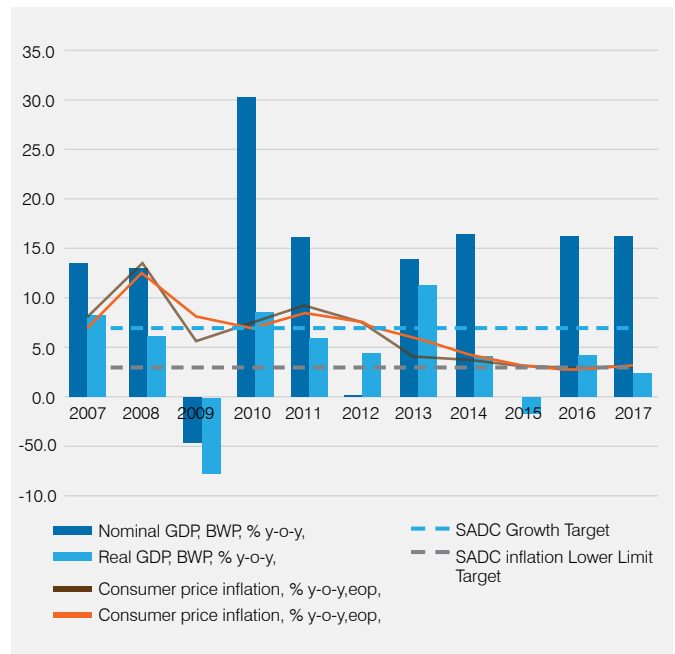
The figure below shows the implemented systems.



MACRO ECONOMIC AND INVESTMENT ENVIRONMENT

The establishment of NBFIRA in 2008 was preceded by the global financial crisis which started with the collapse in the housing and credits markets of the United States of America in late 2007. This was followed by other broad based economic crisis and negative shocks, including the European sovereign debt crisis of 2010 - 2012 and the global commodity price alignments of 2014-2016. The financial crisis led to bankruptcy of major banks and affected the industrialized countries, with a spillover to exporters of commodities, including Botswana diamonds. As a result, the first 10 years of NBFIRA existence coincided with slow global and domestic economic growth. However, the financial crisis subsided and the global economy recovered, ending the decade stronger having reached 3.1% in 2017 - the highest growth rate since 2011. Even so, the improvements in economic growth remain unevenly distributed across countries and regions, with economic prospects for commodity exporters remaining particularly challenging. In Botswana, real GDP growth, for the most part of the past 10 years, was below the SADC target growth of 7% (Finance and Investment Protocol). Inflation reached a historic low of 2.8% in 2016 and fell within the SADC 3-7 % target since 2013.

Chart 1: Botswana Economic Growth and inflation 2008-2018



Source: Bank of Botswana and Statistics Botswana

Botswana’s credit ratings (short term currency) saw a series of downgrades by both Moody’s and Standard & Poor’s on the back of falling export earnings from diamond proceeds and slow uptake of Governments economic diversification efforts. Table below shows more downgrades than upgrades but ending the decade with a rating of A-2 and A2 with a stable outlook by both S&P and Moody’s, respectively.

Chart 2: Evolution of Botswana’s Credit Ratings

Year	S & P			MOODY’S		
	Rating	Outlook	Direction*	Rating	Outlook	Direction*
2006	A+	Stable	●	A1	Stable	●
2007	A+	Negative	↓	A1	Positive	↑
2008	A-	Stable	↑	A2	Stable	↓
2009	A-	Stable	●	A2	Negative	↓
2011	A-	Stable	●	A2	Stable	●
2012	A-	Stable	↓	A2	Stable	●
2013	A-	Stable	●	A2	Stable	●
2014	A-	Stable	●	A2	Stable	●
2015	A-	Stable	●	A2	Stable	●
2016	A-	Negative	↓	A2	Stable	●
2017	A-	Stable	↑	A2	Stable	●
2018	A-2	Stable	↓	A2	Stable	●

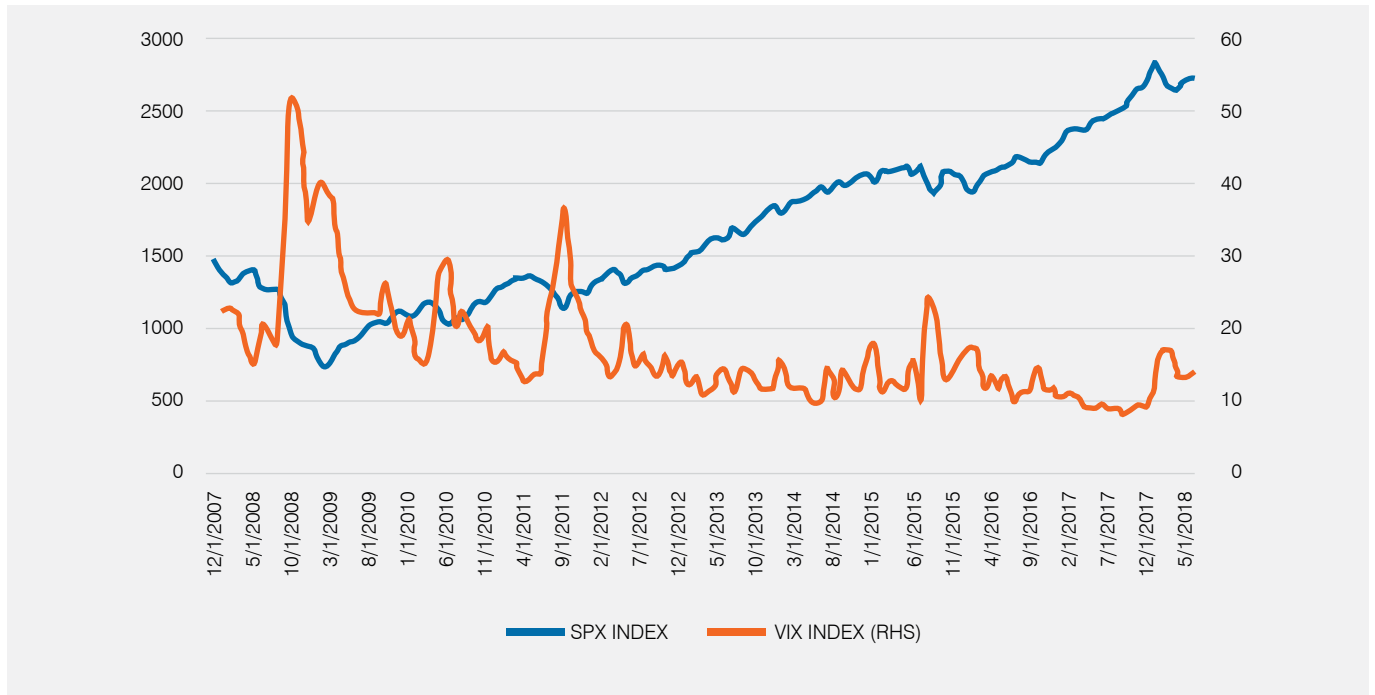
Direction* ↑ Upgrade ● No Change ↓ Downgrade

Source: Bank of Botswana

Conditions for investments were depressed and investors were fearful at the early years of *the Regulatory Authority’s* establishment. However, confidence was restore over years as reflected by the Chicago Board Options Exchange (CBOE) Volatility index (the VIX or fear index), is a key measure of expectations of near-term volatility conveyed by the S&P 500 Stock index option prices. It indicated a more bearish market at 60 in 2008, compared to a more bullish market at 10 in 2017, a total decrease of 82 % in a decade.

It is evident from the graph below that investor confidence, post the financial crisis early in the decade, turned positive and the S&P 500 ended the decade at its highest. The market had towards the end of 2015 shown panic that Britain’s much anticipated “Yes vote” in the referendum of June 23, 2016 to exit the European Union on March 29, 2019, coupled with fears that the impending election of Donald Trump as president of the USA in late 2016 were market unfriendly.

Chart 3: Performance of the S & P 500 (SPX) and VIX Indices (2008-2017).



Source: Bloomberg

Domestically both the Domestic Company Index (DCI) and the Foreign Company (FCI) Index mirrored the S&P 500 in the reaction to the 2007 financial crisis. Both indices have since recovered and

ended the decade higher than 2008 levels but with the FCI remaining much lower than the pre-crisis levels as the foreign capital remained in safer haven markets. Refer to chart below.

Chart 4: Performance of the Botswana Stock Market Indices

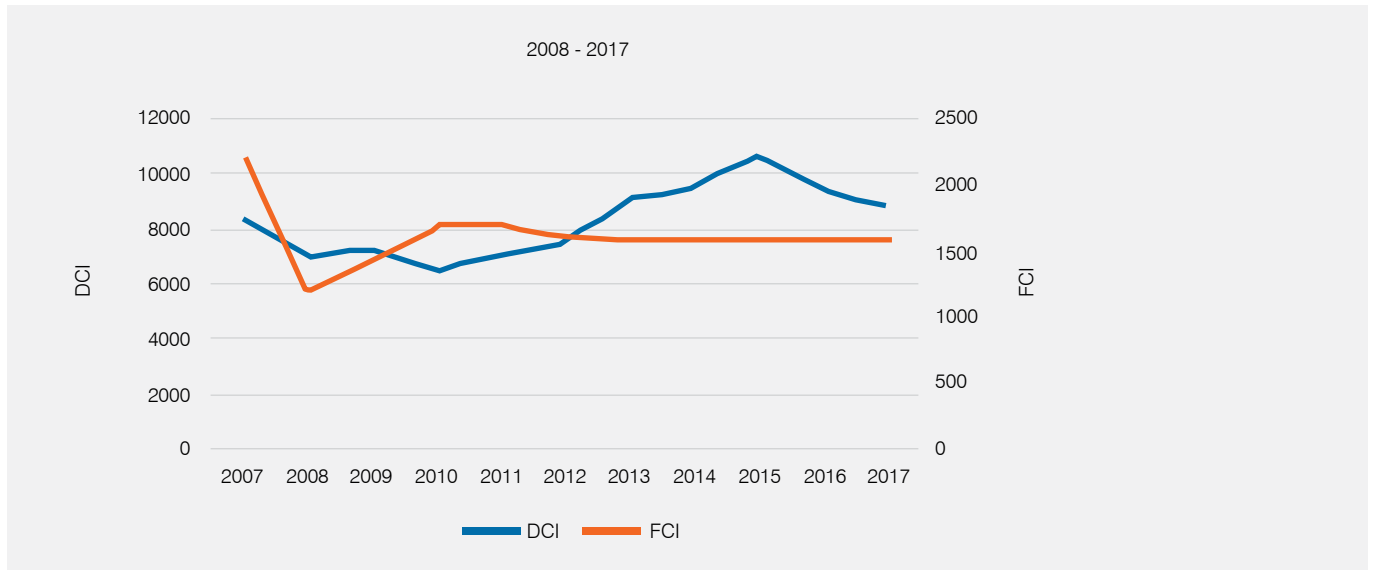
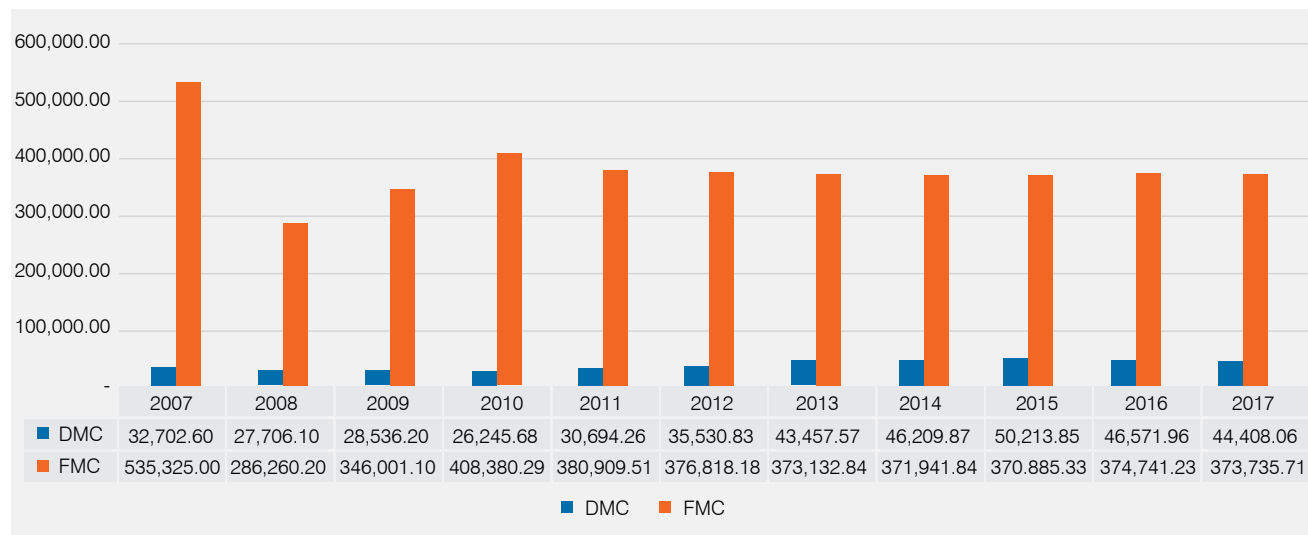


Chart 5: Botswana Stock Exchange Market Capitalization 2008-2018



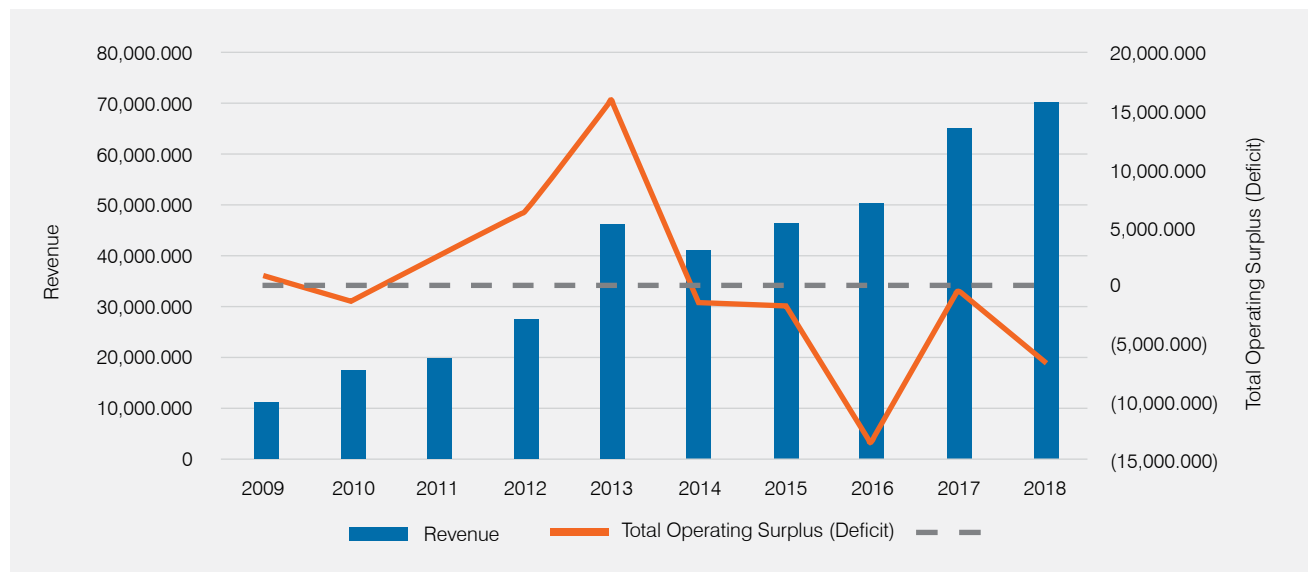
FINANCIAL PERFORMANCE OF NBFIRA

the Regulatory Authority's financial statements are prepared in accordance with the International Financial Reporting Standards (IFRS) and the provisions of the Non-Bank Financial Institutions Regulatory Authority Acts of 2006 and 2016. The annual financial statements have been prepared on the historical cost basis, except for certain financial instruments measured at fair value, and incorporate the principal accounting policies.

The revenues of *the Regulatory Authority* has over the ten years increased from P10 million to P70 million. *the Regulatory Authority* has continually reduced dependence on Government

subvention as it currently stands at 24% with 76% coming from levies the regulated entities pay. The objective of *the Regulatory Authority* is to achieve financial sustainability and operate with a self-sustaining funding model. However, *the Regulatory Authority* has been running operational deficits for the past five years; while operational surplus were recorded in the early years of its operation, save for 2010. This is a result of increases in expenditure emanating from acquisition of IT systems, increase in the staff establishment (including recruitment of senior management) supporting the risk based supervision, training and litigation costs, especially at the end of the decade.

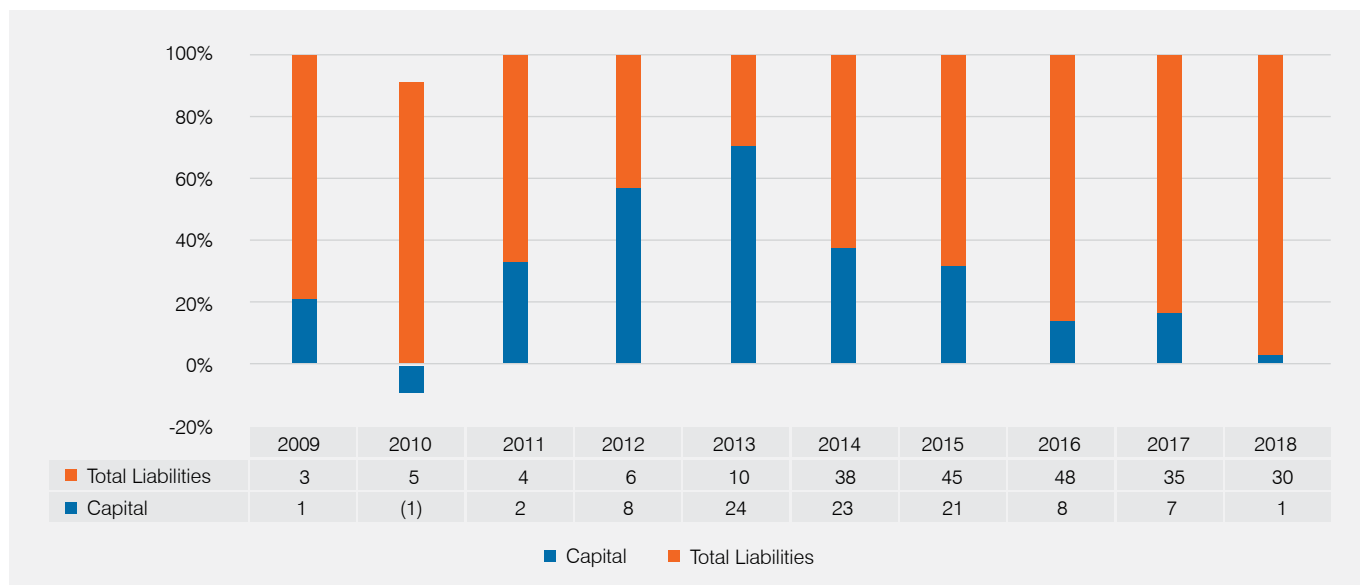
Chart 6: NBFIRA'S Comprehensive Income - Ten years to March 31, 2018.



The statement of **the Regulatory Authority's** financial position in terms of total assets grew to P31 million from P4 Million in the ten years to March 2018. **The Regulatory Authority** has built up a strong balance sheet over the years reaching P66 million in 2015 but this has since reduced to P31 million in 2018. Similarly, **the Regulatory Authority's** ratio of current assets/current liabilities has been on a nose dive since 2013. Even though the current ratio is currently sitting at 1.79 as compared to 3.05 in March 2017 the ratio is still high and will adequately cover the short term obligations of **the Regulatory Authority**. The establishment, the human capital, which is the most important resource to **the Regulatory Authority** was set at 93 staff

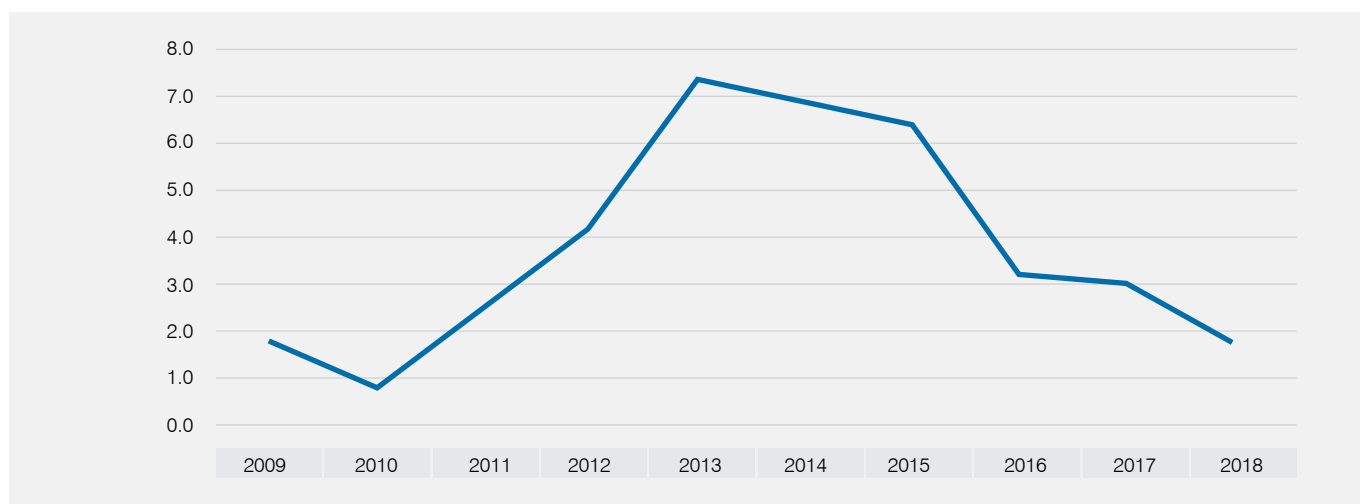
members but recruitment was gradual over the years with staff in post growing from 14 staff members at inception of **the Regulatory Authority** in April 2008 to 89 staff members as at March 31, 2018. Recently, **the Regulatory Authority** was allocated an additional post for the AML/CFT function taking the establishment to 94 and hence 5 vacancies were recorded at the end of the decade. However, staff welfare costs as a percent of total expenditure were contained below 60% over the past six years of the decade and compares favourably in relation to Mauritius, South Africa and Namibia who in 2015 recorded 70%, 63% and 62%, respectively.

Chart 7: NBFIRA Statement of Financial Position - Ten years to March 31, 2018.



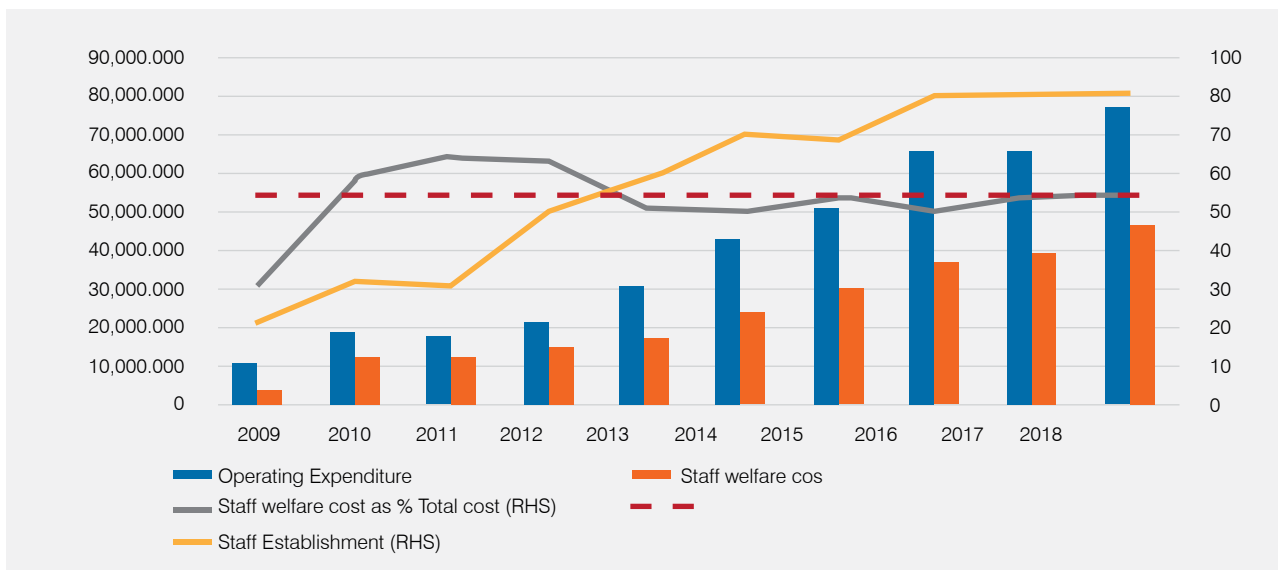
Source: NBFIRA

Chart 8: Ratio of Current Assets to Current Liabilities – 2008 - 2018



Source: NBFIRA

CHART 9: NBFIRA Staff Welfare Costs and Total Expenditure



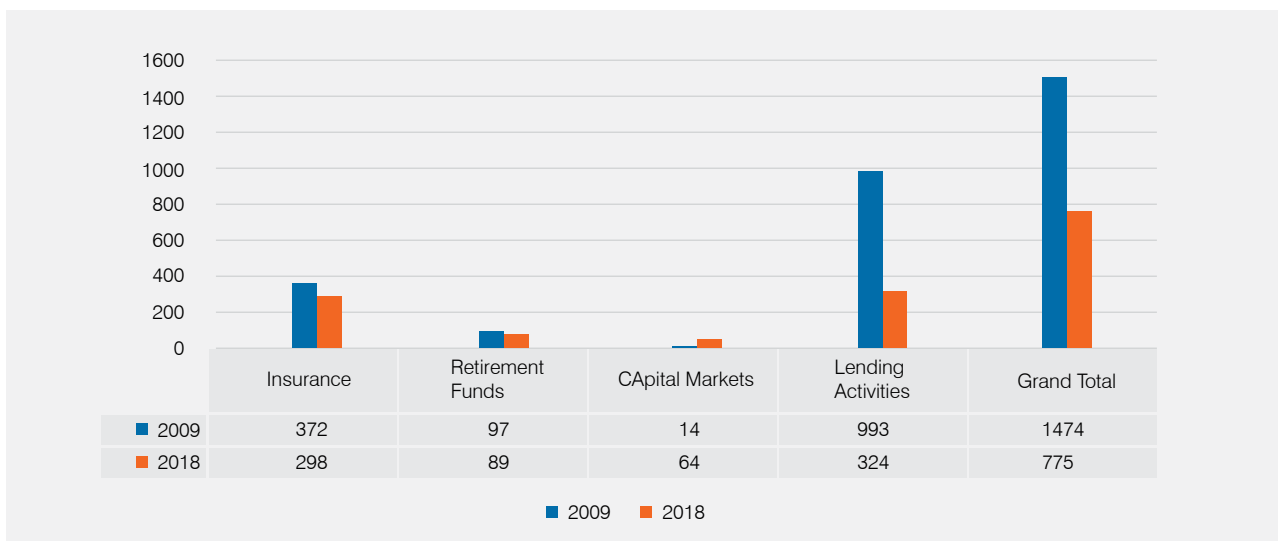
Source: NBFIRA

NUMBER OF REGULATED ENTITIES OVER THE 10 YEAR PERIOD

The NBF sector registered a decrease of 50% in the total number of entities active from 1474 entities in 2009 to 775 in March 2018. This is attributable to a slowdown in registration as well as amalgamations and withdrawals in the Insurance, Lending Activities and Retirement Funds; recording negative growth rates over the past 10 years. In the lending activities sector a significant number of micro lenders that previously

operated under a waiver did not regularize their operations when the micro lending regulations were effected in March 2012. The number of entities in the Retirement Funds industry decreased to 89 in 2018 from 97 in 2009 as some stand-alone funds joined umbrella funds and some were liquidated, while the Insurance industry decreased by 20% to 298 in 2018 from 372 in 2009. Capital Markets industry grew by 33% to 64 in 2018.

Chart 10: Number of Active NBFIs over the Past 10 Years



DEVELOPMENTS IN THE RETIREMENT FUNDS INDUSTRY

Retirement Funds Legislation

Prior to the establishment of *the Regulatory Authority* in 2008, the Retirement Funds Sector was regulated and supervised by the Ministry of Finance and Economic Development (MFED) (the then Ministry of Finance and Development Planning) under the Registrar of Insurance and Pensions division. Initially, Pensions and Provident Funds were regulated through the Pensions and Provident Fund Act 1987 and Regulations (Cap 27: 03). The said legislation was responsible for the regulation of the establishment, licensing and operation of Pension and Provident Funds in Botswana. As new developments of the Pension Funds Industry advanced, the said legislation proved to be misaligned with new developments such as pension fund governance issues, prudent investment management practices and international best practices.

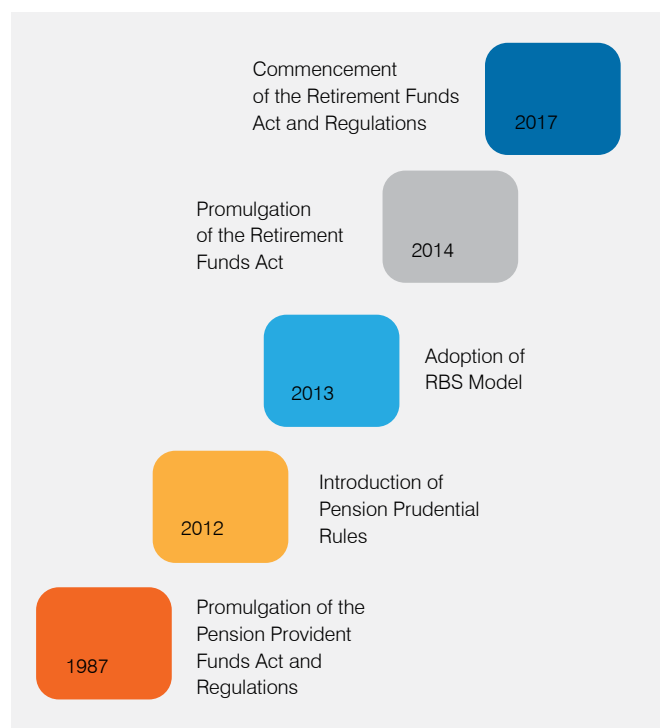
In an effort to address the above development gaps, and in order to align with international standards, *the Regulatory Authority* adopted the risk based regulatory model, introducing the NBFIRA Prudential Rules on March 1, 2012, with emphasis on pension fund governance, investments and pension fund reporting requirements. The Prudential Rules made provision for a more pronounced regulation and supervision of pension fund investments, such as the formulation of investment strategies, prescribed valuation methods for pension fund assets and limitations and spread on different kinds of assets. The Prudential Rules also addressed pension fund Governance issues, such as the minimum standards expected of a board member, performance assessment of, and by the Board, appointment of service providers and formulation of policies such as Risk management, Communication and Investment policies (which are subject to investment limits). The Prudential Rules also provided for periodic reporting to *the Regulatory Authority* in a prescribed manner, for purposes of enhancing offsite monitoring.

In April, 2017, the Retirement Funds Act (2014) ("RFA"), which repealed the Pensions and Provident Funds Act (1987), commenced. The RFA (2014) covers in detail, Fund Governance issues, which include inter alia; Licensing and Supervision of Service Providers, specific provisions for the different types of Retirement Funds, as well as, the powers to issue investment guidelines and approval. In respect to Fund Governance, the RFA (2014) prescribes the composition of the Board, appointment of an Independent Specialist, the constitution of a quorum and number of meetings to be held in a year. The RFA (2014) also provides for the licensing and supervision of Retirement Fund Administrators. In addition, it recognises the licensing and supervision of Individual Retirement Funds, Preservation Funds, Beneficiary Funds, External Funds and Multi-Employer Funds.

The Retirement Funds Regulations which support the RFA (2014) commenced and were gazetted on April, 11 2017. The Regulations

outline the licensing requirements for Retirement Fund Administrators who are now specified as regulated entities, as well as, issues of corporate governance, and supervision of service providers.

Chart 11: Legislative Reforms



Movement from Defined Benefits to Defined Contributions

There has been a continuing shift towards Defined Contributions (DC) Pension Funds from Defined Benefits (DB) Pension Funds. DC Pension Funds now account for the majority of Retirement Funds in Botswana. The number of DB Funds has since decreased to two (2) pension funds in 2018 from 10 in 2008. The transition from DB to DC Funds is in line with international trends, where the employer is discharged with post-employment liabilities.

Licensed Pension Funds

During the financial year ended March 2008, there were 97 licensed Funds in comparison to the 86 licensed Funds in March 2018, being a decrease of 5%. The decrease in the number of licensed Funds was mainly due to a combination of activities including liquidations, and transfers from Standalone funds to existing Umbrella Funds. *The Regulatory Authority* has observed a trend wherein Standalone Funds are joining Umbrella funds. The transfer of standalone pension funds to the Umbrella funds has contributed to the increase of Sub Funds from 123 in March 2008 to 285 in March 2018, representing



an increase of 132%. This development translates to an effort by Pension Funds to employ cost saving measures to benefit from the lower costs by aggregating as many funds into a single Umbrella Fund and benefiting from economies of scale.

Membership

The total membership of Retirement Funds as at March 2018 was 259,301, being an increase of 85 %, compared to approximately 140,000 membership in March 2008. The largest Fund is the Botswana Public Officers Pension Fund (BPOPF) and constitutes the largest membership. Total membership of the said fund has demonstrated growth of 65% over the period 2008 to 2018 from

96,000 members to 158, 174. The BPOPF continues to constitute over 60% of the total membership over the period. See table 1 below.

Table 1: Membership Status

	Membership 2018	Membership 2008	% Increase
Active	230 006	122 000	89
Deferred	17 326	11 000	58
Pensioners	11969	7 000	71
Total	259 301	140 000	85

Growth of Retirement Funds Assets

Chart 12: Retirement Funds Asset December 2007- December 2017

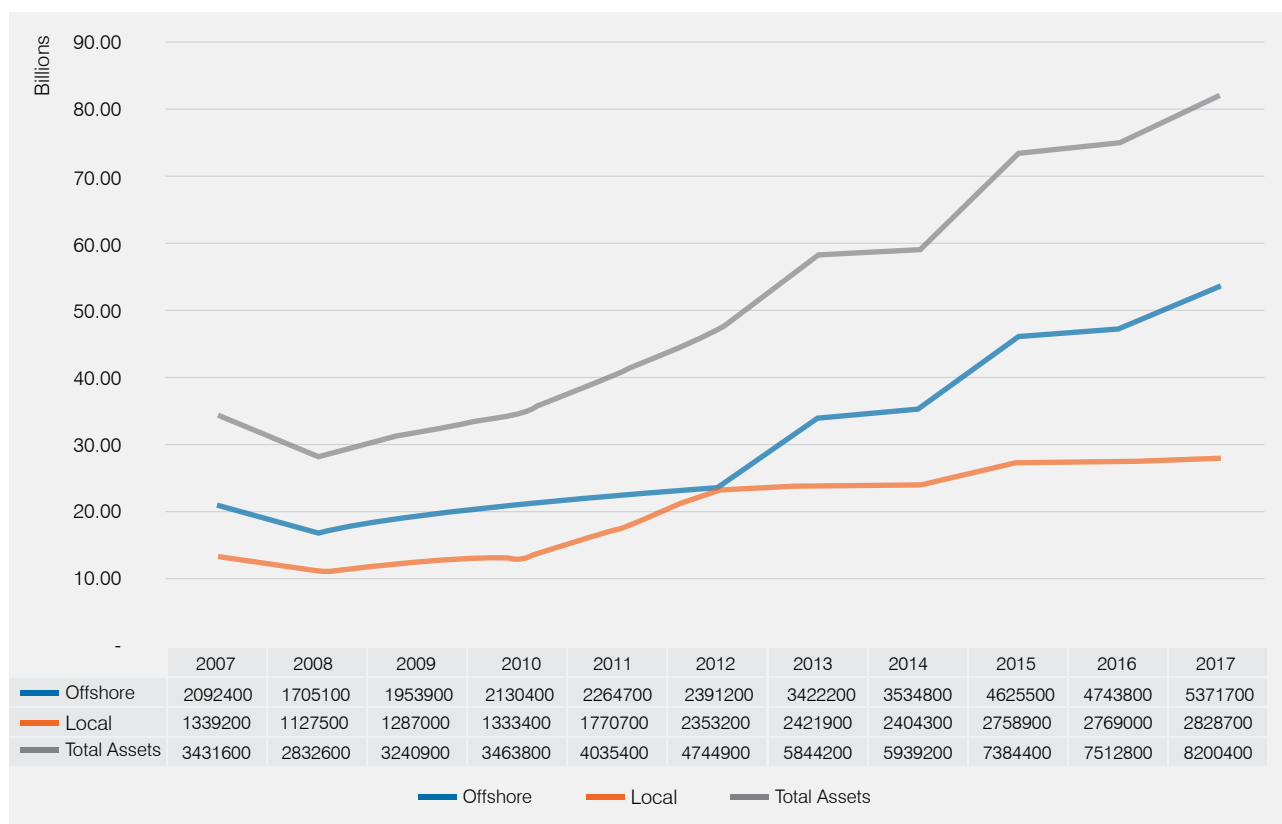


Chart 12 above shows an average growth rate of 10% for Botswana Pension Funds’ assets for the Period 2008-2017. The main driver for the growth is attributable to the increases in membership by 8.9%, income on investment and general pensionable salary. During the period 2008 /2009 and 2015/2016, there was a decline in assets due to the global economic melt-down and poor performance in the equities markets.

The chart also depicts the offshore and local asset split in absolute terms. It is worth noting that despite the decision to allow Pension Funds to invest up to 70% of their assets outside the country, total offshore investments for the period 2008-2017, had never reached 70% of total assets. From the past ten (10) years, asset split has been dominated by offshore assets with an average growth of 11%. The offshore asset split is on an upward trend whilst the onshore is on a flat, due to the lack of investment instruments in the local market and appetite for better returns from the emerging markets.

Chart 13: 2008 vs 2017 Retirement Funds Assets

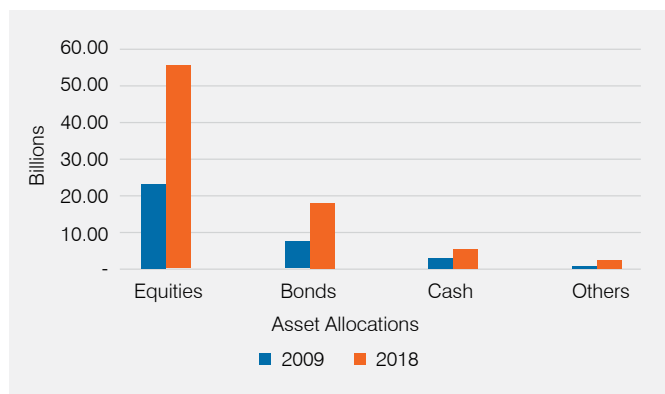


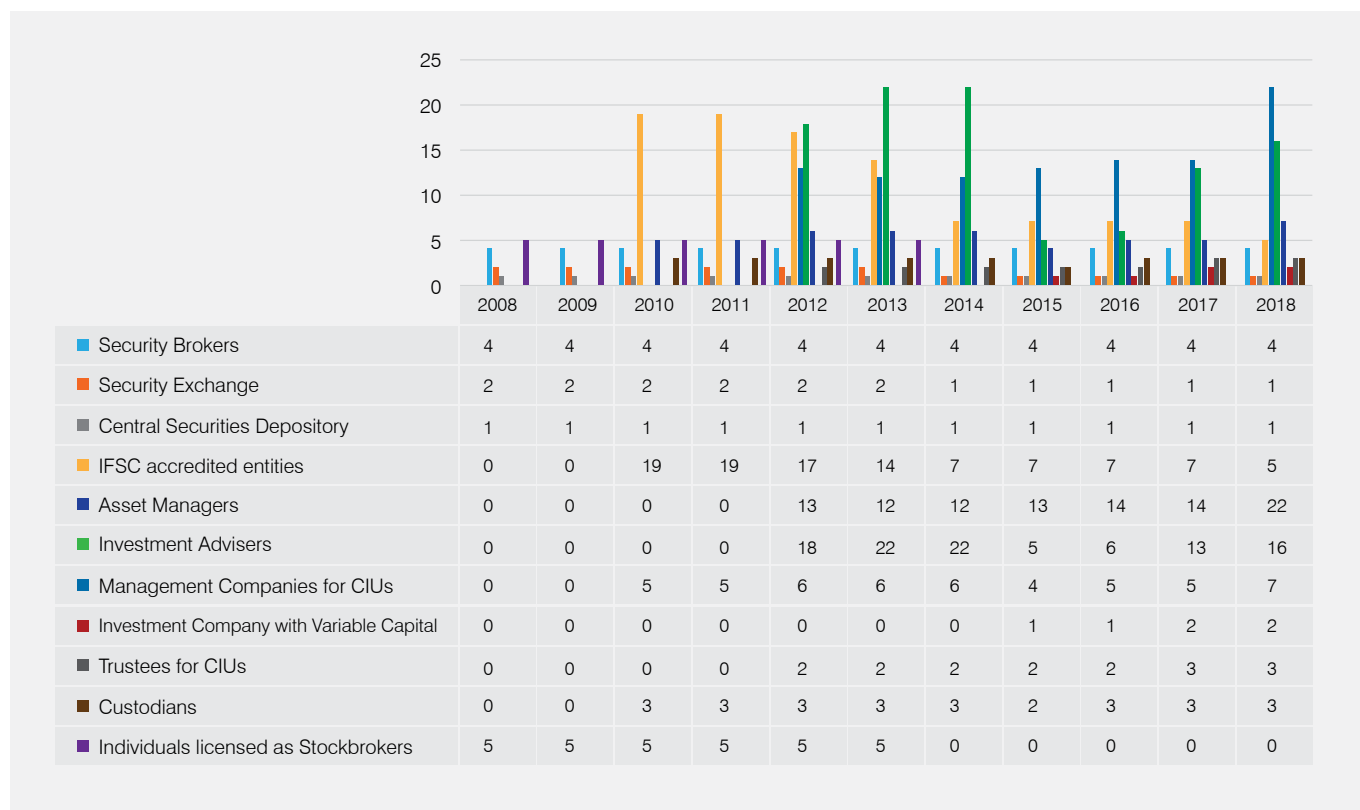
Chart 13 above shows the investment in the different asset classes for the periods 2008 and 2017. Over the period, the pension funds has been investing mainly in Equities, Bonds and cash with growth of 138%, 135% and 73% respectively. The proportion of investment in the various asset classes has increased over the 10 year period with more growth experienced in equities due to their potential to earn high returns. In addition, there is a notable increase in the proportion of non-conventional assets (equities, bonds and cash) to alternative assets such as Property and Private Equity.

DEVELOPMENTS IN THE CAPITAL MARKETS

The Regulatory Authority started by directly regulating and supervising the securities exchanges and security brokers/dealers, micro lenders and any other business that did not fall either under the insurance or pensions industries. The sectors that have been under the supervision of Bank of Botswana, including, asset managers collective investments undertakings, custodians and trustee banks, IFSC companies were transferred to **the Regulatory Authority** in 2009. During the period 2009 and 2011 **the Regulatory Authority** developed securities Act and its regulations, and reviewed the CIU Act. **The regulatory Authority** restructured the capital markets department between 2014 to 2016, but transferring asset managers and investments advisors to retirement funds, while micro lenders, finance and leasing companies were transferred to lending department. Assets managers and investments advisors have since been transferred back to capital markets.

In 2017, the Capital Markets Department had a restructuring exercise and took a decision in line with international best practice to relocate the Investment Institutions Unit, which had operated under the Retirement Funds and Investment Institutions Department as a stand-alone Department, to Capital Markets Department in order to align it to the Securities Act (2014).

Chart 14: Licensed Capital Market Players During 2008-2018



The chart and table above shows the number of entities regulated between 2008 and 2018. The table shows that the number of entities grew from 12 entities in 2008 to 64 in 2018, a 433% increase. Asset Managers and Management Companies were later migrated to NBFIRA in 2009 from Bank of Botswana, following the promulgation of the NBFIRA Act, 2006, which classified them as Non-Bank Financial Institutions. The number of Asset Managers grew rapidly by 69% from 13 in 2012 to 22 in 2018, whereas Management Companies increased by 40% from five (5) to seven (7) between 2010 and 2018. There were no investment advisors registered with NBFIRA in 2008 however in 2012 they began to register with NBFIRA with the promulgation of the Capital Market Institutions (CMI) prudential Rules. CM registered eighteen (18) investment advisors in 2012 and additional four (4) were registered in 2013. The number of Investment advisors declined drastically between 2014 and 2015 because there was a clean-up campaign undertaken to have all the registered Investment advisors to now apply for Licensing Exemptions. The recorded number of entities of investment advisors in 2014 were entities which were in the books of NBFIRA not exempted. The total number of five (5) in 2015 was the number of entities which were issued with exemptions.

IFSC accredited entities were initially nineteen (19) in 2010 and 2011 and experienced a decline of 18%, 16%, 14% and 6% between the years 2010-2018. The decline in the IFSC's is attributed to NBFIRA's decision to focus on IFSC's that carries out non-bank financial institutions activities and due to some voluntary exits by some entities.

There were two (2) exchanges registered with NBFIRA in 2008, being the BSE and Bourse Africa Limited. BSE was the securities exchange whilst Bourse Africa Limited was a commodities exchange. Bourse Africa Limited then exited the market in 2014, BSE then remained the only exchange up to date.

Capital Markets Legislation

The legislative framework that governed the operations of the Capital Markets as at 2008 were as follows;

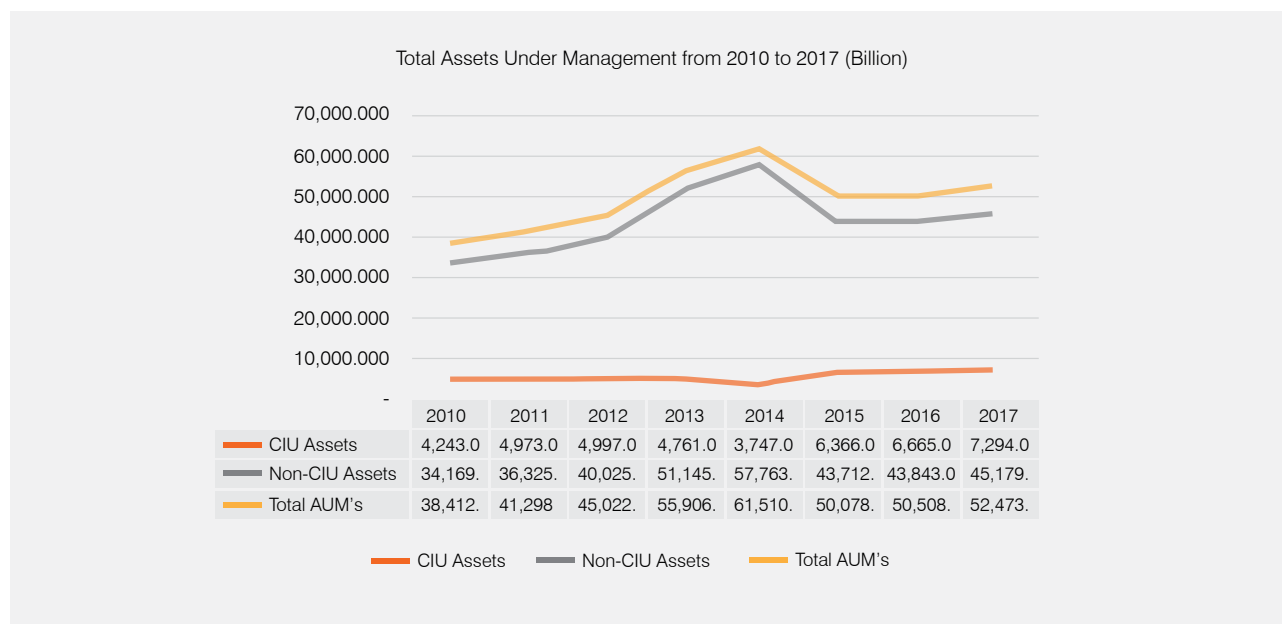
- The NBFIRA Act (2006);
- The Botswana Stock Exchange Act; The Collective Investments Undertaking Act; and, Part XVI of the Income Tax Act.

The NBFIRA Act (2006) was the umbrella statute to the financial services laws. In addition to the legislation that was in place, the NBFIRA Board of Directors approved the Capital Market Institutions (CMI) Prudential Rules in 2012 for adoption in the market, which are as follows;

- The NBFIRA (Securities Business Corporate Governance) Rules 2012;
- The NBFIRA (Market Intermediaries' Conduct of Business) Rules 2012;
- The NBFIRA (Market Intermediary Licensing) Rules 2012; and
- The NBFIRA (Persons Operating a Securities Infrastructure Business) Rules 2012.

These rules were issued in accordance with Section 50 of the NBFIRA Act (2006). NBFIRA thereafter issued a Guidance Note instructing all CMIs to submit requisite information for eligibility for exemption from licensing; pending the promulgation of the CMI Regulation

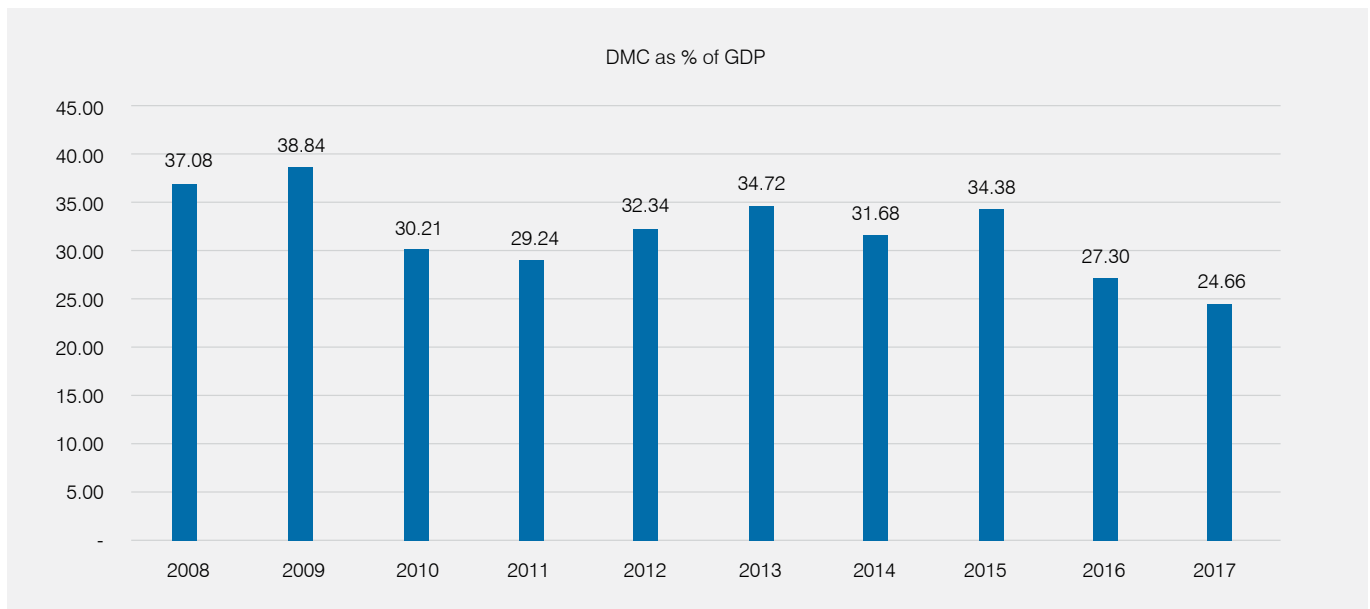
Chart 15: Assets under Management from 2010 -2017



The chart above shows the trends of the AUMs of Asset Managers and Management companies from the year 2010 when they began reporting their AUMs to 2017. CIU Assets have been relatively stable from the year 2010 to 2017 while non-CIU assets have been unstable. Non-CIU Assets saw an increase of 69% from 34 169 billion to 57 763 billion between the year 2010 and 2014. Moreover, the Non-CIU assets reached its peak in the same period, 2014. This is attributable

to the growth in the number of entities over the years and issuance of additional mandates to locally licenced Fund managers by the Botswana Public Officers Pension Fund (BPOPF). From 2014 the non-CIU Assets declined by 24.3% from 2014 to 2015 and increased slightly until to date. For all the years under consideration, non-CIU assets surpassed CIU assets by more than five times thereby the graph of total AUMs resembled the graph of the non-CIU Assets.

Chart 16: Market Capitalisation (Domestic) as % of GDP

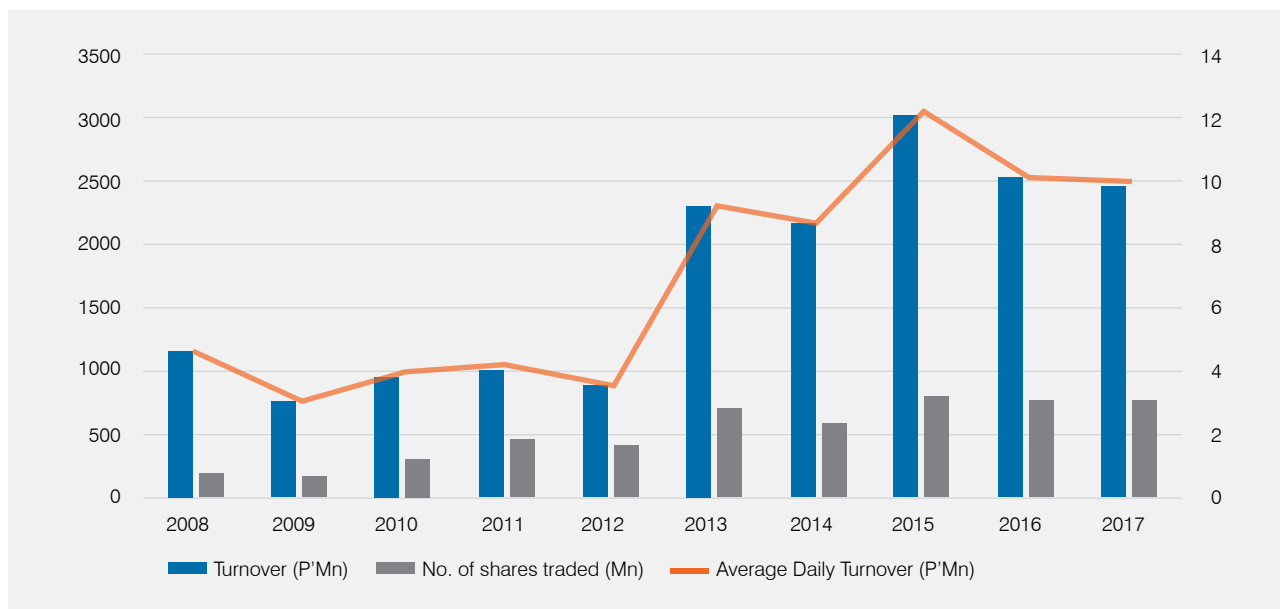


Source: 2016 BSE Annual Reports

The year 2009 reported the highest market capitalisation as a percentage of GDP while 2017 reported the lowest. The domestic market capitalisation as at the end of 2009 was P28.5billion when compared to the market capitalisation at the end of 2017 which was P44.4 billion. When comparing the two years, domestic market

capitalisation in 2017 was 55.6% higher than recorded in 2009, while GDP was higher by 134.9%. Growth in GDP at current prices has therefore outweighed growth in market capitalisation which explains why market capitalisation as a percentage of GDP is only 24.66 in 2017 compared to the 38.84 reported for the year 2009.

Chart 17: Liquidity in the BSE during 2008-2018



At the beginning of the 10 year period under review, we can see from chart 16 shows that sometime in 2009, turnover began to decline. This was the local markets response to the global financial crisis that hit financial markets in September 2008. The effects of the crisis hit the Botswana market in mid October 2008 as evidenced by the DCI which went spiralling down, although turnover remained relatively high in quarter 3 and quarter 4 of 2008. The effects are also seen in 2009 where average daily

turnover fell from P4.8million per day in 2008 to P3.8million per day. During 2010 turnover started to increase as the market was in the process of recovery and continued through to 2011. Average daily turnover declined from P4.1Mn in 2011 to P3.6Mn. The BSE stated that the decrease could be due to the uncertainty brought about by the financial crisis where investors may have been looking for alternative investment options.

Table 2: Indicators of Liquidity in the BSE

Date	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Turnover / Average Market Cap (%)	3.9	2.7	3.5	3.5	2.7	5.9	4.9	6.3	5.3	5.4
Standard Deviation	9.7	7.7	8.6	13.5	6.9	15.9	18.6	17.9	33.8	33.5
Coefficient of Variation (CoV)	2.1	2.5	2.2	3.3	1.9	1.7	2.1	1.5	3.3	3.4
Shares Traded/Shares Listed (%)	3.4	2.9	3.9	4.8	4.3	8.8	5.2	7	6.4	5.9

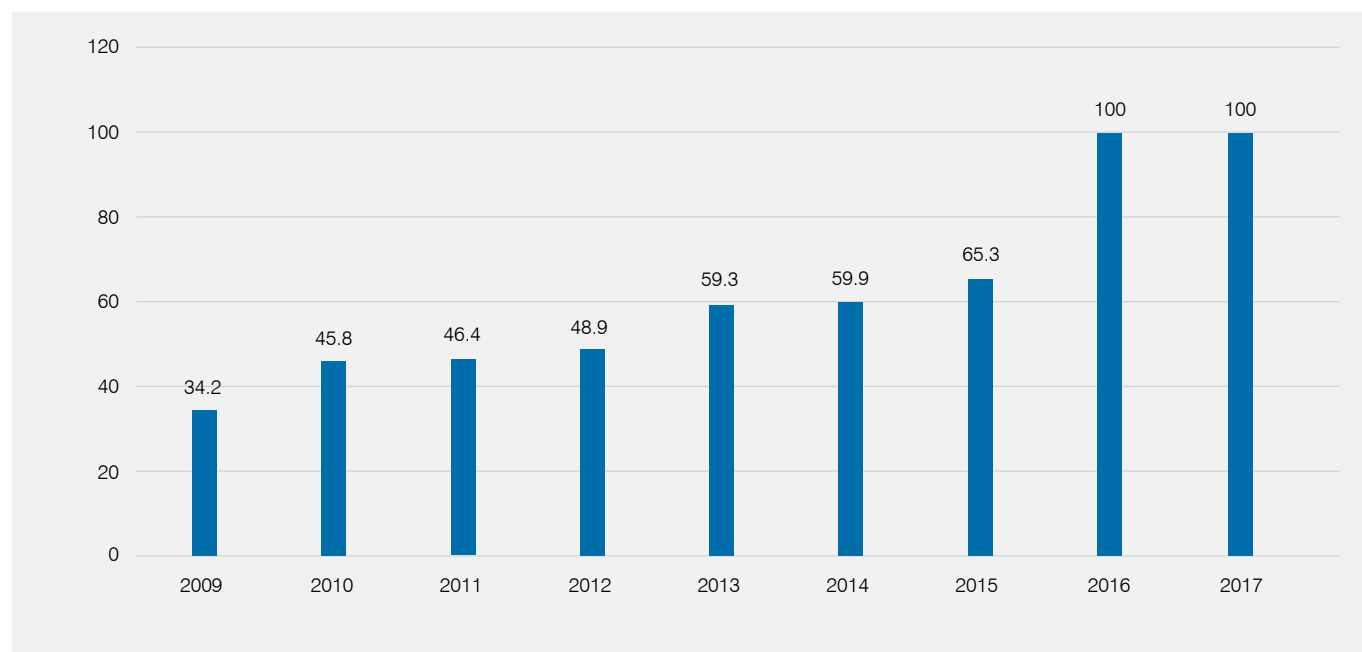
When looking at chart 16 in conjunction with table 2 across the ten year period, 2009 had the lowest shares traded as a percentage of shares listed following the global financial crisis, while 2013 stands out as the year with the highest volumes of shared traded as a percentage of shares listed. In 2012 the low standard deviation of 6.9 highlights it as the year in which turnover was more stable. 2015 stands out as the year with the highest turnover as well as highest volume of shares traded, where average daily turnover was up to P12.20 million. BSE reported that the annual turnover of P3.0billion has been the highest since the inception of the BSE in 1989. Similarly the

volume of shares traded in 2015 (P803.1Mn) was the highest since the inception of the exchange. With a coefficient of variation of 1.5%, 2015 had the lowest variation of turnover across the 10 year period. The BSE was of the view that these indicators show improved stability primarily due to the increased contribution by companies to turnover, and the reduced concentration of certain companies in respect of contribution to turnover. Turnover has been most volatile during the past two years being 2016 and 2017. From table 2 we can conclude that the latter 5 years of the 10 year period under review have shown that liquidity levels have improved when compared to the first five years. Turnover as

a percentage of average market capitalisation remained over 4.9% compared to the 3.9% which was the highest of the first five years. Similarly shares traded as a percentage of shares listed in the past

five years has remained over 5.2% reaching heights of 8.8% while the highest percentage in the first five years was 4.8%.

Chart 18: Dematerialisation of Domestic Securities



The introduction of the CSDB in May 2008 permitted the clearing and settlement of shares to take place electronically on a delivery versus payment basis, doing away with the delays experienced by investors in receiving their physical share certificates. By the end of December 2008, shares of all domestic companies listed on the BSE were transferred allowing the clearing and settlement of transactions belonging to these counters to take place through the CSD. From then, we can see a gradual increase in the percentage of dematerialised shares across the years with a significant increase in 2016. This is due to **the Regulatory Authority's** approval of the CSD's request to make dematerialisation of shares compulsory which was effected in February 2015. This was to assist in the prevention of over-the-counter trades in listed shares which adversely affect the fairness and transparency of the market as other market participants including the BSE and CSD were not privy of the transactions. After 2016, dematerialised shares will always be at 100% as it is no longer permitted to hold physical share certificates.

DEVELOPMENTS IN THE INSURANCE INDUSTRY

The Regulatory Authority took over the reins from the Ministry of Finance and Economic Development ("MFED"), the then Ministry of Finance & Development Planning, to regulate and supervise the

insurance industry with effect from 1 April 2008. In taking over from MFED, **the Regulatory Authority**, continued the regulation and supervision mandate with the aim to promote the maintenance of a fair, safe and stable insurance sector; protection of the interest of the insurance policyholders and in addition promoting the general development of the insurance sector. The legislative tools available were the Insurance Industry Act (1987) and its Regulations which centred on the compliance based type of legal framework.

As at the end of March 2009 there were 201 regulated entities comprising of 16 Insurers, 36 brokers and 149 corporate agents. In addition there were over 1000 individual agents (now called representatives) selling insurance business. As at March 31, 2018 there are 298 regulated entities comprising of three (3) reinsurers, nine (9) medical aid funds, 19 Insurers, 57 brokers and 210 corporate agents. In addition there are over 2400 representatives that are selling insurance business. The latter depicts a huge growth of almost 52% in regulated entities in the 10 year period.

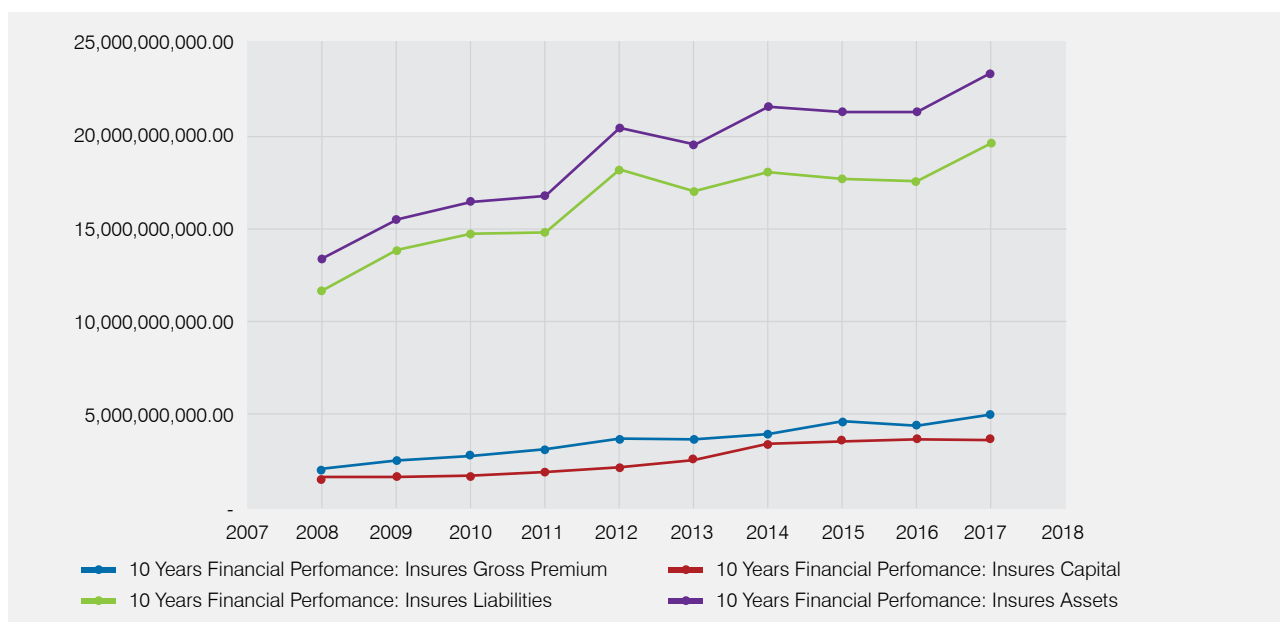
The gross written premiums grew by 138% from P2.1 billion in 2008 to P5 billion as per the financial figures of 2017. The foregoing is attributable to both the number and type of products offered together with increased appreciation by the public of the need to

have insurance cover. During the 10 year period, three short-term reinsurers joined the market, two (2) in 2009 and one (1) in 2013. The reinsurers’ gross written premiums were P4 million as per 2010 figures and grew to P190 million in 2017 which depicts an exponential growth. Their assets also grew from P10 million in 2010 to P254 million in 2017. The assets of the insurers grew by 75% from P13.3 billion in 2008 to P23.3 billion as per the financial figures as at 2018.

Table 3: 10 Years Financial Performance of Insurers in Pula Million

Date	Gross Premiums	Capital	Liabilities	Assets
2008	2,099	1,655	11,677	13,332
2009	2,549	1,648	13,802	15,451
2010	2,803	1,764	14,695	16,459
2011	3,153	1,958	14,830	16,788
2012	3,684	2,212	18,157	20,379
2013	3,741	2,584	16,975	19,549
2014	3,960	3,465	18,032	21,497
2015	4,631	3,591	17,659	21,250
2016	4,455	3,729	17,503	21,232
2017	4,997	3,672	19,627	23,299

Chart 19: 10 year Financial Performance of Insurers



The first decade of **the Regulatory Authority’s** existence has a history of seven (7) mergers and acquisitions deals involving both local and multinational companies. The mergers and acquisitions that occurred involved the already existing licensed entities, three (3) of which were insurers merger, three (3) insurance brokers mergers with the remaining one (1) being insurance corporate agents.

The insurance market embraced new distribution channels by utilizing the mobile phone services providers to reach potential customers and service the existing ones. Further there has been utilization of the post office as premium collection point as it has a countrywide foot print.

The insurance market also saw the establishment of associations such as Botswana Short-Term Insurance Underwriters Association

(BSTIUA) and Botswana Insurance Brokers Association (BIBA). The coming together of these insurance players was seen as a commendable development in that they provide platforms for but not limited to, discussion by industry stakeholders of matters of common interest; facilitate the development of the insurance industry; develop professional and ethical standards for the industry; constructively influence the environment in which the industry operates. The insurance industry had its own challenges attributable to forces of both internal and external environment. Below are some of the challenges that the industry faced;

1. Using of unregistered agents;
2. Non-compliance to requirements of the governing insurance legal framework;
3. Late submission of license renewals;

4. Late submission of Annual Returns and audited financial statements;
5. Poor customer complaints handling processes within the entities leading to such being escalated to **the Regulatory Authority**;
6. Few long-term investment instruments;
7. Closure due to economic pressures and poor governance

Notwithstanding the challenges, the department achieved the following milestones over the 10 year period;

1. Promulgation of an Insurance Industry Act (2015) which is still on notice awaiting the promulgation of its regulations;
2. Signing of various Memoranda of Understanding (MoUs) with regional insurance supervisors;
3. Issuance of various directives and circulars for the betterment of the insurance industry and encouragement of compliance;
4. Introduction of quarterly reporting by insurance companies in order to frequently gauge the market performance and detect early warnings whilst waiting for the annual submissions;
5. Development and implementation of Prudential Rules in 2012 which assisted in alignment with the risk based supervision approach;
6. The responsibility to register representatives (also known as individual agents) was given to the regulated entities through issuance of a guideline whose aim was to encourage ownership of the on boarding process by the regulated entities. The entities in turn submit the quarterly returns on representatives

On the downside, **the Regulatory Authority** had to liquidate one short-term insurer, close 17 brokers and cancel licenses of 98 corporate agents during the 10 year period due to various regulatory reasons.

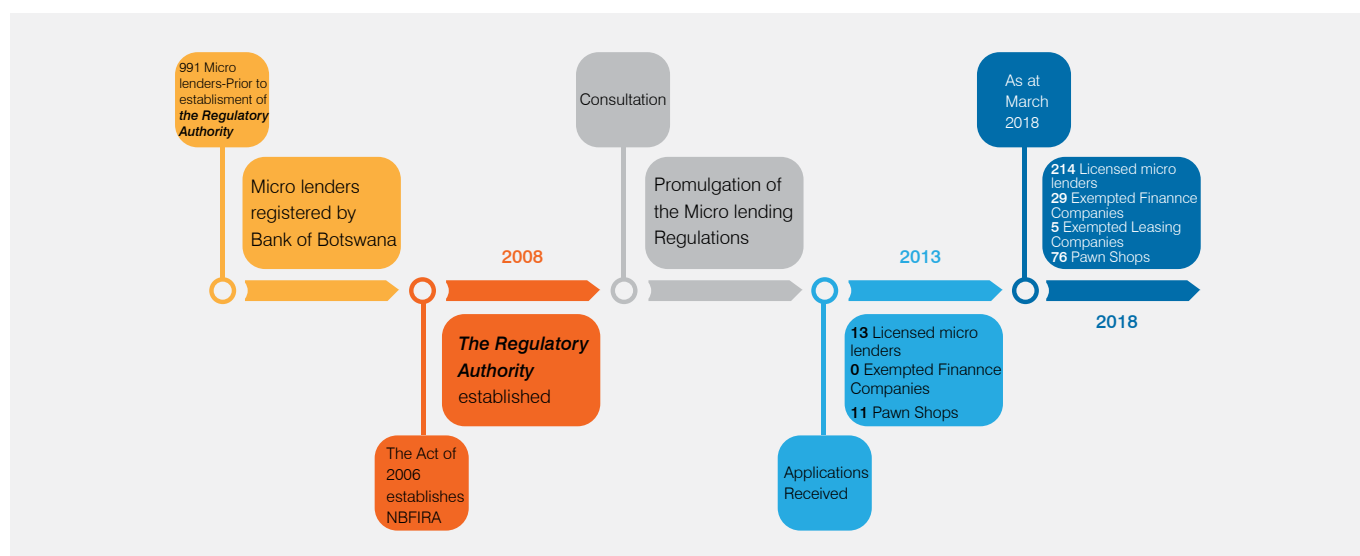
DEVELOPMENTS IN THE NON-BANK LENDING ACTIVITIES

Prior to the establishment of **the Regulatory Authority**, the micro lending sector was not actively regulated. Any person who wanted to carry out business as a micro lender was issued with a letter of no objection by Bank of Botswana. Based on consolidated data provided by the Micro Lenders Association of Botswana, Bank of Botswana, public enquiries and Ministry of Investment Trade & Industry; as at April 1 2008, the size of the micro lending sector was estimated to be 991 entities and individuals.

The Regulatory Authority and the Micro Lenders Association of Botswana worked closely together in the absence of the Micro Lending legal framework in an effort to promote good market conduct and responsible lending. The Micro Lenders Association of Botswana played a key role in the absence of the regulations by developing a code of conduct for its members.

During early 2009, **the Regulatory Authority** with the consultation of the industry developed the Micro Lending Regulations. The commencement of the Micro Lending Regulations became effective upon their publication on March 9, 2012. Micro Lending Regulations introduced market conduct requirements which intended to achieve consumer protection. A financial consumer protection framework which promotes fair and equitable financial services practises by setting minimum standards for financial services providers in dealing with consumers. This was to increase transparency in order to inform and empower consumers of financial services and foster confidence in the financial services sector. It was also meant to provide efficient and effective mechanisms for handling consumer complaints relating to the provision of financial products and services.

Chart 20: Milestones in Supervision of the Lending Activities



Source: 991 Micro Lenders statistics-Bank of Botswana, Micro Lenders Association of Botswana, Public enquiries and the Ministry of Trade Investment& Industry



“Continuing to do more; A decade of financial stability”

As at March 31, 2013 only 184 micro lenders had applied for licensing, a far less number compared to the 991 that was recorded at the time of establishment of **the Regulatory Authority**. The entry set criteria that came with the regulations was not favourable to all hence the low license applications rate.

Prior to the promulgation of the micro lending regulations there was a conduct issue where micro lenders were retaining customers’ bank cards and identity documents. This was corrected through the implementation of the Micro Lending Regulations which barred retaining such documents.

The number of licensed micro lenders increased by 1546.2% from 13 in 2013 to 214 entities in 2018 whilst Pawn Shops increased by 590.9% from 11 to 76 in 2018. Exempted finance companies saw a growth of 100%, from zero 2013 to 29 in 2018. Currently, **the Regulatory Authority** has exempted 5 leasing entities. The sector loan book has seen a 63.6% growth, from P2.2 billion in 2013 to P3.6 billion in 2018, while sector total assets increased by 55.6% in the same period.

Chart 20: Lending Activities Portfolio During 2013-2018

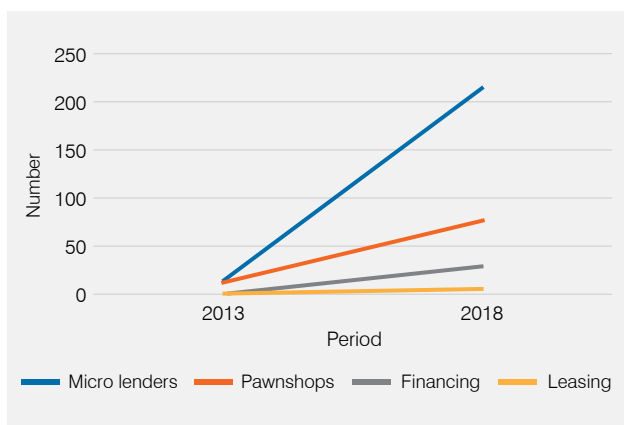


Table 4: Assets of the Micro lenders

Year	2013 (BWP Billion)	2018 (BWP Billion)	% Change
Total Assets	2.7	4.2	55.6
Loan Book Values	2.2	3.6	63.6

Chart 22: Balance Sheets of Micro Lenders

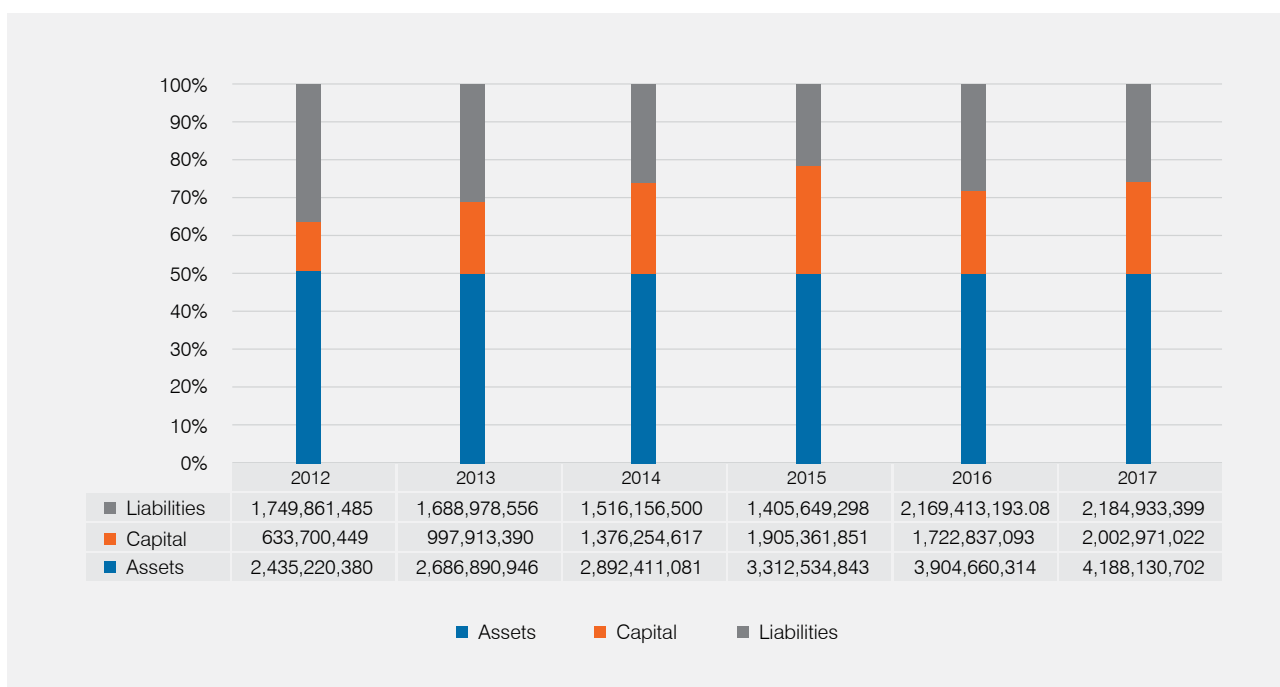
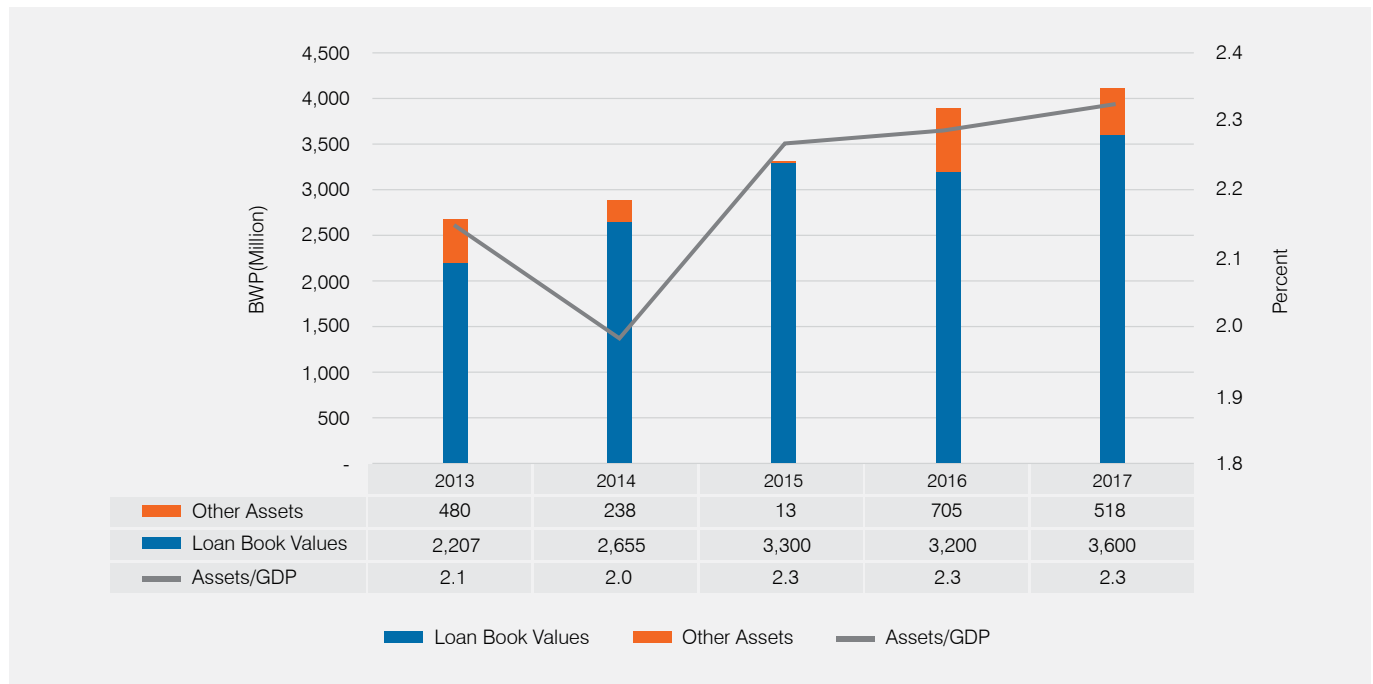


Chart 21 above shows the structure of financial position of the micro lenders in terms of total assets, equity and liabilities. The Micro lending total assets has been increasing over the years as a result of increase in loan book which is a major component of the sector. The growth

in the sector loan book was as a result of more capital injection into the business by shareholders, some entities increased their borrowing limits, new entrants into the market and government programs to stimulate the economy for example the economic stimulus package.

Chart 23: Assets of Micro lenders as a Percentage of GDP



In relation to the GDP, the total assets of micro lenders' growth decreased between 2013 and 2014. The reduction could be explained by promulgation of the Micro Lending Regulations in 2012 which resulted in a significant number of entities and individuals that deemed the regulations as unfavourable not applying for micro lending licences. It is important to note a rapid growth of the total percentage growth of assets of the GDO between 2014 and 2017. This confirms the important contribution of Micro lenders to the economy.

Micro lending entities are an important vehicle in enabling the public, in particular the vulnerable to have access to financial services. The geographic dispersion of micro lenders is wide, with micro lenders mostly concentrated in Gaborone, Francistown and Selibe-Phikwe.

RED MARK: VILLAGE WHERE THERE IS A MICRO LENDER



BOARD CHAIRPERSONS OF NBFIRA IN THE FIRST DECADE OF ITS OPERATIONS



Mr. Kenneth O. Matambo
First Board Chair
October 1, 2007 - July 31, 2009



Ms. Mmatlala Dube
Chairperson
August 1, 2009 - September 30, 2017



Dr. Tebogo T.K. Matome
Acting Chairman
October 1, 2017 - November 30, 2017



Ms. Ludo Tema
Acting Chairperson
December 1, 2017 - March 31, 2018

CEO's OF NBFIRA IN THE FIRST DECADE OF ITS OPERATION



Ms. Elaina Gonsalves
Interim Founding CEO
April 1, 2008- October 19, 2008



Robert J. Horbat
First CEO
October 20, 2008-Septemebr 30, 2009



Oaitse M. Ramasedi
Current CEO
Since March 10, 2010

FORMER BOARD MEMBERS OF NBFIRA IN THE FIRST DECADE OF ITS OPERATION



Ms. M. Dube
Member
October 1, 2007 -September 30, 2017



Mr. S.S.G. Tumelo
Member
October 1, 2007- December 31, 2008



Mrs. L.K. Mohohlo
Member
October 1, 2007 - October 2016



Mr. S. M. Sekwakwa
Member
January 1, 2009 - September 30, 2017



Dr. T.T.K. Matome
Member
March 1, 2010- November 11, 2017



Mr N.C. Greenland
Member
October 1, 2007-November 20, 2014



Mr M. Mbaakanyi (Late)
Member
October 1, 2011 - September 30, 2015



Ms. L.G. Matenge
Member
October 1, 2007 - September 30, 2011

DEPUTY CEOS OF NBFIRA IN THE FIRST DECADE OF ITS OPERATION



Mr. Oaitse M. Ramasedi
Deputy CEO
September 1, 2009 - March 9, 2010



Mr. Melville S. Brown
Deputy CEO – Regulatory
(Redesignated Advisor) July 6, 2011 -
2014



Dr. Hira Sadhak
Deputy CEO-Regulatory
June 10, 2013 - July 7, 2015



Mr. Michael Tlhagwane
Deputy CEO-Corporate Services
January 1, 2013 – September 30, 2016



Mr. Sriram Gade
Deputy CEO- Regulatory
Since September 1, 2016



Mr. Mao Segage
Deputy CEO – Corporate Services
Since September 4, 2017

NBFIRA'S DIRECTORS OF DEPARTMENTS IN THE FIRST DECADE OF ITS OPERATION



Mr. Meshack J. Tafa
 Director - Corporate Services
 October 1, 2008 - 2013



Ms. Juliana White
 Director - Capital Markets
 February 1, 2009 – February 28, 2011;
 and Since October 16, 2016



Ms Marcelina !Gaoses
 Director- Insurance and Pensions
 December 1, 2009 - February 29, 2012



Ms. MV Raphaka
 Director - Insurance
 Since October 1, 2015



Mr. Sriram Gade
 Director - Lending Activities
 October 8, 2014 - August 31, 2016



Mr. Abisha Ndoro
 Director - Retirement Funds
 October 16, 2014 - October 31, 2016



Ms. Bopelokgale Soko
 Director - Retirement Funds
 Since November 1, 2016



Ms. Ditshetsa Makepe
 Director - Legal and Enforcement
 Since August 1, 2017



Ms. Ntema Modongo
 Director - Lending Activities
 Since October 1, 2017

BOARD OF DIRECTORS AS AT MARCH 31, 2018



Ms. Ludo Tema
Member
Since May 15, 2015



Ms. Motlalepula Kabomo
Member
Since November 1, 2017



Ms. Agnes Khunwana
Member
Since October 1, 2015 & Since April 9, 2017



Dr. Lesedi Senatla
Member
Since September 1, 2017



Mr. Keletsositse Olebile
Member
Since October 1, 2017



Ms. Ivy Ramalohanye
Member
Since October 1, 2017



Ms. Patrinh Masalela
Member
Since September 1, 2017

EXECUTIVE MANAGEMENT OF NBFIRA AS AT MARCH 31, 2018



Mr. Oaitse M. Ramasedi
CEO
Since September 1, 2009



Mr. Sriram Gade
Deputy CEO - Regulatory
Since September 1, 2014



Mr. Mao Segage
Deputy CEO - Corporate Services
Since April 9, 2017



Mrs Juliana M. White
Director - Capital Markets
Since October 20, 2016



Mrs. Matlakala V. Raphaka
Director - Insurance
Since October 1, 2015



Ms. Bopelokgale Soko
Director - Retirements Funds
Since November 1, 2016



Mrs Ditshetsa Makepe
Director - Legal & Enforcement
Since August 1, 2017



Ms. Ntema Modongo
Director - Lending Activities
Since October 1, 2017



Mrs Ghadie Seromelo
Executive Chief Internal Auditor
Since July 1, 2017

DOMESTIC AND INTERNATIONAL RELATIONS

In recognition of the global nature and interconnectedness of financial markets, and in line with best international practice that aims to curb systemic risk from being transmitted across borders, **the Regulatory Authority** has embraced the coordinated action with national, regional and international authorities. During the past

ten years **the Regulatory Authority** has entered into Memorandum of Understandings (MOUs) with local and international authorities to ensure effective cooperation. Table 5 below records such arrangements during the review period.

Table 5: Memorandum of Understandings (MOUs)

Local Organisations		International Organisations
2008		
2009		<ul style="list-style-type: none"> Financial Services Board of South Africa (FSB) The Committee of Insurance, Securities and Non-banking Financial Authorities
2013	<ul style="list-style-type: none"> Competition Authority Bank of Botswana 	<ul style="list-style-type: none"> The Office of the Registrar of Insurance and Retirement Funds of Swaziland
2014	<ul style="list-style-type: none"> Botswana Unified Revenue Services Botswana Accountancy Oversight Authority 	<ul style="list-style-type: none"> Comisao Do Mercado de Capitais of the Republic of Angola Securities and Exchange Board of India
2015	<ul style="list-style-type: none"> Financial Intelligence Agency 	
2017	<ul style="list-style-type: none"> Statistics Botswana 	<ul style="list-style-type: none"> Capital Markets Authority, Kenya
2018	<ul style="list-style-type: none"> Botswana Investment & Trade Centre 	<ul style="list-style-type: none"> Retirement Benefits Authority

To further ensure efficient and effective regulate on in line with best practice **the Regulatory Authority** is also a member of various international standards setting bodies as presented in Table 6 below. The Non-Bank Financial Institutions Regulatory Authority (NBFIRA) of Botswana was first time elected to the IOPS Executive Committee

on 5 November 2013 (c.f. IOPS/AGM (2013)7) in Seoul, Republic of Korea to serve during 2014-2015. The Regulatory Authority was re-elected in Berlin, Germany on 29 October 2015 (to serve 2016-2017) and in Belle Mare, Mauritius on 24 October 2017 (to serve 2018-2019).

Table 6: Membership of International standards setting bodies and Participation

Standard setting Bodies	Committees participation	Portfolio
ESAAMLG	Expert Review Working Group	Appointed to review the Mutual Evaluation Review of Zimbabwe
IAIS	None	N/A
IOSCO		
IOPS	Technical Committee	Research and publication of technical papers for policy advice to IOPS governing members
CISNA	Insurance Retirement Funds, Medical Schemes & Financial Intermediaries Sub Committee (IRMIS)	To Harmonise and Enhance the Effectiveness of Regional Financial Regulatory and Supervisory Frameworks in Line with Applicable Global Regulatory Principles, Standards and Best Practices

STAFF WELFARE - SELECTED FEATURES

Staff Pension Fund

The NBFIRA Staff Pension Fund started as an umbrella Fund under the Senthaga Pension Fund in 2009. At commencement nine (9) staff members were enrolled and over time the number of pensionable staff increased to eighty-four (84) as at March 2018. The objective of the pension fund is to provide retirement income to employees of

the Regulatory Authority, their dependents and beneficiaries at the end of their employment.

As an Umbrella fund the Fund is managed by trustees of an appointed Fund Administrator under the relevant vehicle. A Management

Committee acts a liaison between the Fund Administrator and membership of the Fund.

As a contributory pension scheme, members contribute four percent (4%) of their monthly salary, while the employer (NBFIRA) contributes sixteen percent (16%). Pension Administration fees are borne by the employer. At the end of June 2017, the Fund assets were P22 Million.

Staff wellness

The Regulatory Authority has over the decade supported staff gain access to quality and efficient medical care by supporting their subscription to medical aids of their choice. Furthermore, there is recognition for preventative care through maintenance of a healthy lifestyle and exercise for which staff are supported in membership of gymnasiums and participation in regular wellness activities.



NBFIRA received first position award at the 2014 Botswana Consumer Fair



NBFIRA representatives at Botswana Consumer Fair

Financial Literacy Activities



Crowd gathered during NBFIRA presentation and edutainment performances



edutainment

TEN YEARS STAFF MEMBERS COMMENTS



Cathrine Ntshole

I started in the Insurance department and I also did some procurement duties and complaints resolution. I moved to Lending Activities in 2013. I see tremendous growth in **the Regulatory Authority** and very modern processes.



Morweetsana Kedisitse

The insurance department has grown a lot. We started with a team of 8, only two of us remain in the department to date, but it is now a team of 12. We used to focus on collection of data from the industry and now we actually analyse the data. Even our legislative documents have improved.



Tiroeng Makwaeba

I have served at the pleasure of three heads of **the Regulatory Authority** in my tenure. We started with very little, we didn't even have an IT officer. With an increased staff compliment over the years. We have improved our processes and I see a lot of innovation in how we do things today. I am extremely impressed with where we are today.



Queen Monyatsi

I started my career with NBFIRA since its inception, in the Insurance Department and moved to the Retirement Funds Department in 2010 to date. In January 2017, I was nominated to be part of the NBFIRA AML champions, a position that I learnt a lot of new skills. I have been a part of the RBSS implementation Team from inception as a super user of this system. With broader responsibilities and higher client expectations, I have acquired and developed the skills required, I see great growth in **the Regulatory Authority**.



Matlakala V. Raphaka

I am honoured to have been in the Insurance Department since its inception. I started as a Manager in 2008. I was appointed as Deputy Director in the Insurance and Pensions Department from September 2011-October 2013. From November 2013 to September 2015, I got the position of Deputy Director, and in October 2015 I assumed the position of Director.



Kgomotso Rammotlana

I was the first Receptionist in 2008, when **the Regulatory Authority** opened its doors. Back then we were an intimate small family of only 15 staff members. Five years later I moved to the Records and Administration office, where I currently am.

TEN YEARS STAFF MEMBERS COMMENTS (cont.)



Keneetswe M. Ntebang

Financial supervision and regulation have evolved significantly over the past 10 years in Botswana, especially looking at the capital markets sector wherein supervision/regulation was close to non-existent when NBFIRA started. I have had the opportunity to see it all happen, from no regulatory framework to the present time where we have the legislations. It was a privilege to be a part of all this, I wouldn't trade it for anything else.



Mbiganyi Modise

It's been 10 years with NBFIRA and I look back with sense of pride. I have seen majority of the developments that took place from the past 10 years within NBFIRA. In 2008, my substantive post was an Insurance Analyst and due to shortage of personnel at the time of establishment of NBFIRA, I also served as a Driver/Messenger and IT Officer. I wish NBFIRA continues to grow and effectively and efficiently supervise the NBF sector for contributing towards the financial stability in Botswana.



Thenjiwe Stephen

My career with NBFIRA started in 2008 in the Department of Insurance and Pensions. I later joined the Insurance Department as an analyst in 2011, the position which I held from 2011-July 2013. I was promoted to Senior Analyst in August 2013. I was in the Insurance Department until June 2017. I was then transferred to the Capital Markets Department in July 2017.



Social Club

The club has initiated some efforts in places of need. These include, Maun children's ward, SOS Gaborone, Sanitary pads donation to Red Cross and donations to people in Kotolaname village.

The club has on a social level travelled to Maun, Palapye, Sun City, Swaziland, Durban and Namibia.



NBFIRA PUBLICATIONS

Annual Reports - Annual reports of *the Regulatory Authority's* financial and operational performance are produced in accordance with the provisions of the NBFIRA Act.

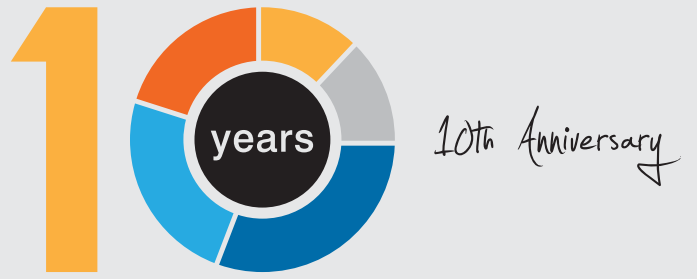
Statistical Bulletins - Statistical Bulletins are published on line to provide insights into financial performance of the NBFIR business sectors and industries and, where allowed by law, includes performance of entities.

Research Bulletins - The purpose of the Research Bulletin is to provide a forum where research relevant to the economy and the financial sector, with particular reference to the non-bank financial sector can be disseminated.

Newsletter - The publication is intended to keep clients of non-bank financial institutions and the general public informed of the financial services and products offered by regulated entities.

Flyers - Combating Money Laundering, Terrorism and Proliferation Financing, About the Non-Bank Financial Institutions Regulatory Authority (NBFIRA), Complaints Procedures







NBFIRA Annual Report 2018

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