



ASSOCIATED COMPLIANCE

FOR A COMMON PURPOSE

Instructions

All the text in red can are links, click on that text to go to relevant page.



**Click on one of the above in the top menu
(numbered arrow pointing to the icon):**

- 1 = Zoom-in
- 2 = Zoom-out
- 3 = View actual size
- 4 = Fit to page
- 5 = View full screen
- 6 = Print
- 7 = Download newsletter



**Click on one of the above in the bottom menu
(numbered arrow pointing to the icon):**

- 1 = Go back to cover page
- 2 = Go back a page
- 3 = Insert page number to go to sepcific page
- 4 = Go forward a page
- 5 = Skip to the last page

**Alternativeley, click and drag on any corner of the pages
with you mouse cursor to turn over the pages (just like you
would do if you were reading a printed magazine)**



Contents

- Click on text to navigate to the page -

From AC

Page 4

From HAS

Page 10

From FSB

Page 14

From the FIC

Page 20

From the IoD

Page 21

Interesting things we have read

Page 21



From AC

Retail Distribution Review (RDR)

We did make the offer in our December Newsletter that we would consolidate and submit all clients' feedback on the various proposals to the FSB so they would, in theory, carry more weight than individual submissions. Given all the chirping and complaining generally we have had from clients around some, or all, of the proposals, many of which are well founded issues, it is disappointing to have to say that we have not had one formal submission from a client.

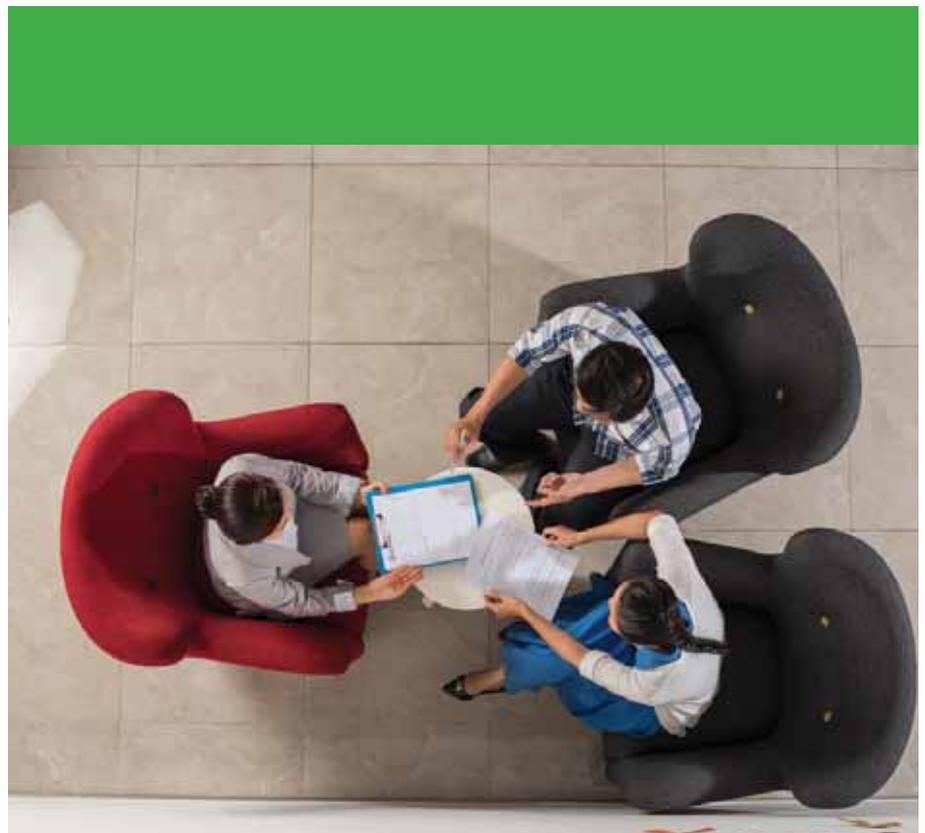
Under this heading we have also offered to assist specific market segments take the RDR opportunity to get their voice heard as to why the RDR generally does not recognise their role in the distribution channel and thus some proposals simply don't fit what they do or there should be other proposals that better cater for their role. These include:

- The Short-term administrator,
- The reinsurance broker, and
- The call centre contracted to sell financial products for a third party.

An article we read via [Insurance Gateway](#) by the FIA ([click here to view](#)) warned against any knew jerk



ASSOCIATED COMPLIANCE





reaction – well from what we see there is very little practical reaction. Are people just brow beaten from a number of years of being told what to do that they are just resolved to merely dealing with whatever comes out of RDR when it comes rather than getting involved? It's a pity if that is the case.

The financial press continue to write good articles on the subject of RDR. One was published via Risk SA under the heading of “How many intermediaries have their heads in the sand” The report was a report compiled by Core Data on the future of advice in South Africa. A sobering read indeed. Follow [this link](#) for the full article.

Another good read on RDR and the impact on the brokers income stream comes from FANews – go have a read and start thinking. [Click here](#) to read the full article which continues on our website.

And yet another article on the subject via RiskSA by Patrick Bracher under the heading RDR is not rational for brokers. [Click here](#) to read more.

By the time you read this article the deadline for submissions will have passed you by!

Also see a further article in the “From the FSB” section on their recent RDR workshop.

AC On line manual

We have started a comprehensive review and upgrade on the AC manual available on our website. This process is likely to take us a couple of months. Once complete we will provide confirmation as well as an overview of the key changes.

We would welcome any input that would help us better align the content with your requirements e.g. what do you feel is missing, what specific documents or guides do you find most useful and those you may find confusing. One thing we have realised is that providing too many examples of one aspect does not always help, as we originally intended it to do, so we will be reducing the example documents and guides and keep the additional ones for use on an ad-hoc basis.

We look forward to hearing from you.

Our newest compliance officers under supervision:

We are pleased to advise that both Phiwo Sithole and Lucia Swartz-Horne have now been approved as compliance officers by the Financial Services Board; subject, of course, to the 3 year supervision period.

FIA affiliated compliance officers

The FIA has recently started to advise its members of compliance officers that it refers to as “affiliated compliance officers”. We were unsure of what or how this affiliate status was attained and maintained, especially as we had submitted a formal application in 2012 to a “tender” put out by the FIA but had heard nothing further from them. We took the matter up with the FIA believing this was maybe the results of that tender process.

The response we received, from Joe Kotze at the FIA, was as follows:

“This initiative was considered as a result of requests from our members. We invited a number of compliance officers on referral by members to become so called affiliates. There are only 14 such compliance officers countrywide and no more will be invited for the time being. We will monitor this project to determine the value add and only then decide on further action.

The project was not advertised but handled internally. The aim was also not to create the impression that the FIA is now embarking on a compliance practice drive, therefore the small number of affiliates.

We appreciate the role your practice plays in the lives of our members and should we decide to expand this initiative we will surely approach you.”

Whilst it does not address the questions we asked around what it takes to be an affiliate we do appreciate the response.

Consumer Goods & Services Ombud

We recently attended the inaugural Consumer Goods & Services Ombud's (CGSO) forum which was very enlightening.

Given that most of you have a passing awareness of the Consumer Protection Act (CPA) we thought we would provide some clarity on how the regulations are applied and will potentially affect you.

Important definitions:

Supplier: is an entity that markets its product to consumers.

Markets: can mean 'promotes' as in advertising and/or actually handing over goods.

Consumer: is the receiver of marketing – so they don't even need to reach the point of being involved in a transaction!

We had some initial queries which were adequately cleared up during the forum:

Is participation compulsory?

Yes – provided the activities provided fall within the definition and once finally enacted. See note 4) for clarity on activities. (Note: "participation" means registration and adherence to the code – at least the terminology makes you feel like you might have had a choice!)

What is the penalty for not registering?

Upon determining that a supplier is not registered this will be handed to the Consumer Goods Commission or the Consumer Goods Tribunal for decision and issuing of a penalty.

What happens if the supplier does not adhere to the Ombud's ruling?

This will be escalated to the Commission or Tribunal to take further action. Their authority then extends to being able to institute legal proceedings.

What is the stance on an entity that is regulated elsewhere and falls under the jurisdiction of a Statutory Ombud (e.g. the Financial Services Ombud) but in some instances sells products that fall under the CGSO's jurisdiction?

Are complaints in these cases to be specifically defined by the product and applicable to the relevant Ombud or is the Statutory Ombud the correct arbiter? This would boil down to the definition of “ordinary course of business” as determined in the case of Doyle V Killeen:

- The entity must be a registered business,
- The nature of the business of the supplier (as shown in the Memorandum and Articles of Incorporation as well as where it clearly earns its income from),
- The nature of the goods,
- The frequency that the goods are sold and
- The frequency of advertising of the goods.
- Note that FAIS registered entities are explicitly excluded from the CPA – provided that financial services is their core business as shown above. On this basis it would appear that peripheral further activities would not fall under the CGSO scheme but would fall directly under CPA and unresolved issues would need to be taken directly to the Commission or Tribunal.

There is some overlap with the National Credit Act – as usual the situation would determine which body would adjudicate on the complaint of either the credit or the goods.

The various voluntary adjudication bodies would obviously also have “first dibs”.

There are currently only 22 registered participants – what is being done to develop awareness amongst providers?

Participation is voluntary at present, an awareness process will be started soon.

What is being done to develop awareness amongst consumers?

Print, radio and further avenues are being investigated once finally enacted.

Will complaints still be heard even if the provider is not a registered participant?

Complaints are currently being dealt with even if entities are not registered.

Will decisions be binding as if they were registered?

Decisions will not be legally binding as per the Financial Services Ombud but membership means you would “buy-in” to the decisions. Further avenues are the Commission and Tribunal who will impose further remedies or institute court proceedings.

What is the complaints process?

The complaints process is similar to that of FAIS – the Ombud is an avenue of last resort. Suppliers must resolve complaints within 15 days but the prescription period is 36 months from purchase/release date!

So, in short: if you are marketing and providing additional non-financial services you are still ‘in the net’ but are not compelled to register as a participant.

If you feel you fall into the category of entities that are compelled to register let us know if you need assistance.

Record keeping

At a recent monitoring visit we were interrogating the file retention standards of the FSP and got into a debate with the FSP’s book keeper on how long financial records should be kept, as the standards for these are greater than that demanded by the minimum 5 year FAIS rule. What became clear is that the standards are far greater than we both understood, with various “guides” telling you it is anything from 7 to 15 years for the retention of annual financial statements for example. It is likely that these standards may well be equally misunderstood by others so we have chosen to provide a copy of a record keeping guide issued by Deloitte & Touche which is in our AC Manual. [Click here](#) to download a copy.

Cyber-crime

We have been promoting the need for a formal fraud policy as part of FSPs' risk management framework for some time. We have also seen the increase in the offering of cyber-crime covers especially via one of our clients, Camargue. So when we were contacted by a provider of a cyber-crime and fraud assessment



service we paid it more than the usual attention as from a compliance perspective being aware of your exposures from cyber-attacks has to be of use, at least to some of our clients, especially with the increasing “paperless” environments. Our concern being that very often there is limited reference to the increased external threats in developing these environments. We are having a formal assessment of our own site and will report back next month on the findings.

Go to www.magixsecurity.co.za for more details

From HAS

The Basic Conditions of Employment Act (“BCEA”) can sometimes be quite confusing. If you read extracts from the Act, it always states “Application” at the beginning of a section. Even though we tend to skip past that and move on to the “interesting” bits, this is actually quite an important paragraph. As you may, or may not be aware, certain parts of the BCEA are, in fact, only applicable to certain members of your staff. Making sure that you are applying the Act to the correct audience that the section is intended for, is therefore vitally important. This extract will also clearly state whom the particular section does not apply to.

Let's take the example of annual leave. See below the "Application" section on annual leave:

labour
Department:
Labour
REPUBLIC OF SOUTH AFRICA

Home | About Us | Contacts | Services | Media Desk | Tenders | Vacancies | Site Map

search

you are here: home → legislation → acts → basic guides → basic guide to annual leave

Basic Guide to Annual Leave

by Zopedol — last modified 2012-08-06 12:46

Basic Conditions of Employment legislation requires that workers get a minimum of 21 consecutive days of annual leave each year. Employers can only pay workers instead of granting annual leave when employment is terminated.

Application

The Basic Conditions of Employment Act applies to all **employers and workers**, but not -members of the -

- National Defence Force,
- National Intelligence Agency, or
- South African Secret Service; or
- unpaid volunteers working for charity.

The section of the Act that regulate **working hours** does not apply to:

- workers in senior management
- sales staff who travel and regulate their own working hours
- workers who work less than 24 hours in a month
- workers who earn in excess of an amount stated in terms of section 6 (3) of the Act
- workers engaged in emergency work are excluded from certain provisions.

The provisions for annual leave do not apply to -

- workers who work less than 24 hours a month
- leave over and above that provided for by the Act

See

- [Basic Conditions of Employment Act](#)

Applies to all employers and workers and regulates leave, working hours, employment contracts, deductions, pay slips, and termination

Fraud Hotline
08600 22 194
fraud@labour.gov.za

Public Employment Service CALL CENTRE
086 0022 198
www.labour.gov.za

News

- [Private security workers call for improved working conditions in the Department of Labour hearings](#)
2015-02-10
10 February 2015
- [Three-day Thongathi \(Tongaat\) Mall Structural Collapse Commission of Inquiry session scheduled for tomorrow cancelled](#)
2015-02-09
09 February 2015
- [Matter of Dr Adams alleged to have defrauded Department of Labour's worker's fund postponed](#)
2015-02-06
06 February 2015
- [Department of Labour and CCMA initiate a national roadshow to educate on amended labour laws](#)
2015-02-05
05 February 2015

You will clearly see from the extract above, that this part of the BCEA does not apply to members of the National Defence Force, National Intelligence Agency etc. Neither does it apply to unpaid volunteers working for charity. Furthermore, you will see it states that the section of the Act regulating working hours, does not apply to – see the seven bullet points above.

For the fourth bullet point – you will also have to know what the amount is that is referred to and this amount is determined by the Minister of Labour as and when the Minister

sees fit. This amount is called the **Minimum Earnings Threshold** and currently this amount is R 205,433.30 per annum (i.e. R 17,119 per month). This implies that all your employees earning this amount or less, are entitled to the full protections and benefits under the BCEA in respect of certain sections of the Act (such as overtime, working hours per week, meal intervals, etc.). It therefore also implies that employees who earn above this threshold, will not be entitled to these stipulated protections and benefits.

To put this into context in terms of Annual leave:

- Annual leave therefore applies to **all your employees** who are not employed in any of the listed National Services.
- The BCEA therefore stipulates that an employee must get a minimum of 15 working days annual leave per annum which must be taken within 6 months after the end of the leave cycle. You can therefore not refuse an application for annual leave from an employee in the given timeframe that this leave must be taken.
- An employer can, however, reject an application for annual leave based on operational requirements, therefore the timing of the leave, but has to ensure that the employee takes that leave at an alternative agreed time within the current leave cycle.
- In addition, and unless the Company's policy provides for the carrying over of unused leave into the next leave cycle, it should be noted that annual leave that was accumulated in a previous leave cycle will expire 6 months after the end of that leave cycle. For example, if a Company's leave cycle runs from January to December of each year and an employee took 10 of the 15 days' annual leave during Leave Cycle 1, then the employee must use the balance of 5 days before June of Leave Cycle 2 or else the annual leave of Leave Cycle 1 will expire. It is advisable that this is explained to employees.
- It is also advisable that your leave policy includes a statement that leave must be taken at a time suitable to the company.
- Should you work in an industry with very specific 'up' and 'down' times, you can have an agreement with your employees that they must take leave during a certain period.

For more information on annual leave – refer to the **Guidance note on annual leave** in

the HAS Manual on the Associated Compliance website (www.associatedcompliance.co.za)

Just for interest sake

You would have noticed in the HAS section of the January newsletter, that in the explanation to the amendments in the Labour Relations Act relating to non-standard employees, a note was added that these amendments do not apply to “Workers whose earnings fall above the earnings threshold” . However, in saying that, you cannot ignore your non-standard employees who earn more than the earnings threshold,



as the amendments also included an amendment to the definition of a “dismissal” (as set out in the newsletter) and if you go to the section on ‘terminations’ in the BCEA, you will see that this section applies to all employees (and not just those earning under the earnings threshold).

Some time ago, I was presented with a sick note from an employee. The sick note was issued by a Traditional Healer. Are you as an employer obliged to accept a sick note from an alternative medicine practitioner? Watch out for more on this next month...

New documents uploaded into the HAS Manual on the AC website

[Guidance Note on annual leave](#)

[Guidance Note on Debarment](#)

From the FSB

RDR workshop

As mentioned earlier on the Newsletter we attended this workshop on 23 February. To be honest it did not provide much by way of additional information or detail. The first half merely provided a run through of the RDR document although a few snippets came out as a result as they did in the question time. Interestingly once the question time started people started to leave – we were expecting this to be the most interesting part as the audience started to debate some practical issues. Maybe they needed to avoid Sandton traffic?

In no particular order some of the issues we noted:

- An adviser firm cannot be a tied agent – only an individual can.
- Any reduction in premium is expected to result in a reduction in the cost of the product.
- Juristic Representatives will be allowed going forward but only where performing an intermediary service.
- The proposed restriction on a Representative only being able to be appointed on one FAIS licence may be relaxed to allow for Representatives to gain experience in another licence category. The lack of restrictions on KIs being on multiple licences is also now being looked at.
- The proposed restriction on premium collections – this will be restricted to entities that have the infrastructure and systems to handle such collections securely and can perform the task better than the insurers could do themselves. This is looking increasingly like the professional collection agencies will be fine but brokers will probably not get the nod.
- Fee disclosures will be done against a benchmark set by the FSB so that the client and the FSB can see who is outside that benchmark and interrogate accordingly.
- The time lines for Phase 1 – which includes any changes to commission levels were confirmed as being planned for implementation this year.
- Disclosures with the new structure will be different. A separate task team is working on making disclosure more effective - and it was stressed not longer –

as they realise disclosure for disclosure's sake will help no one – least of all the client.

- Replacement product issues within the Long-term sector was extensively debated. Many felt that limiting commission would not really solve the problem.
- One of the intentions of RDR is to create credibility for the financial planning functions as being distinct from the sales/product advice process. Clearly this is well supported by the FPI.
- It was acknowledged that within a call centre who perform a mix of advice and non-advice sales that categorising them will be something that needs looking at.



The FSB did however state that a call centre selling one product (or individual representatives doing so) would be seen as a tied agent thus insurers using this methodology would need to appoint these individuals as Representatives – this will be fun as such insurers have consistently refused to follow this route.

- Low income products may not have a simple percentage of premium as the bench mark for commission.

The actual presentation should be available via the FSB website by the time you are reading this article.

The second level Regulatory Exams and Continuous Professional Development – where are they going?

We (well it was Craig in his capacity as chair of the IISA CPD committee) attended a workshop at the Financial Services Board on CPD on 17 February.

Let us start by saying this was a very well thought out and run workshop, one of the better market consultation processes we have been involved in; well done to the FSB!

This was a full day workshop so a full summary cannot be provided in a short Newsletter; let's focus on the likely outcomes. A follow up workshop has been scheduled for 28 April once there have been formal submissions from those present on some of the issues raised. The workshop focussed on the methodology of delivering CPD rather than detail such as the number of hours needed, this will follow.

The FSB have seen, after research, a CPD model they believe can be adapted and applied in the financial services sector. This model is currently applied by SARS with tax practitioners.

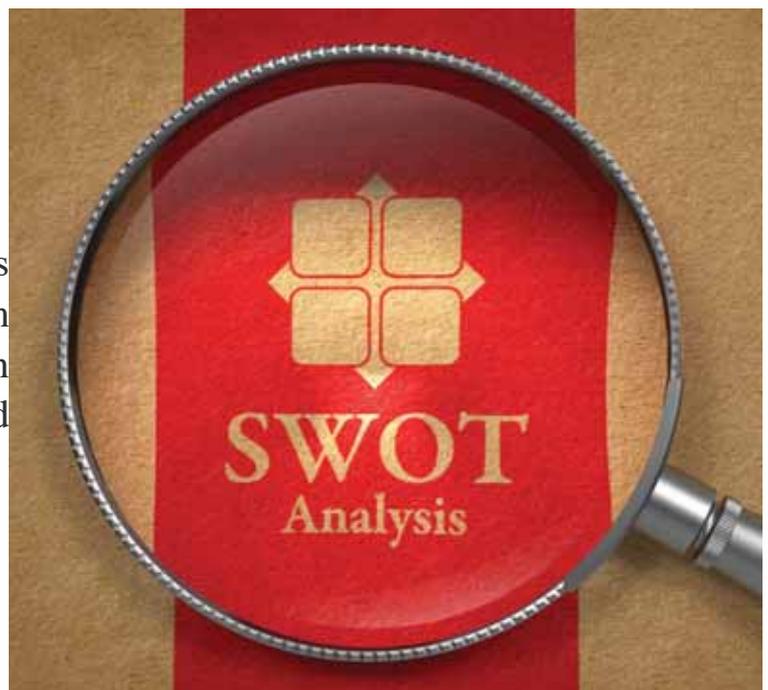
In simple terms the possible structure would see:

- A number of bodies appointed by the FSB to manage the CPD process. These bodies, referred to by SARS as Recognised Controlling Bodies (RCBs) would most likely be the current professional bodies that have a CPD capacity i.e. IISA and the FPI although application would be open to any body that met the criteria.
- All licenced individuals in the industry would need to become a member of one of these recognised bodies.
- These bodies would then apply, supply, monitor and report on the FSB's CPD program for its members.
- The FSB would then monitor the program at controlling body level and not Key Individual and Representative level.

A full SWOT analysis was done on this model. It is this analysis that will form the basis of on-going submissions with the FSB and will culminate in the second workshop in April.

Strengths

- all professional bodies know and understand their members and



- 
- their challenges in terms of being able to develop relevant,
- deals with one size fits all problem,
 - central point of control and records,
 - formal process,
 - eases burden on the FSB,
 - plays into cultural shift,
 - empowers strength of professional bodies,
 - legislative support,
 - synergy between SAQA and controlling body requirements,
 - much of the criteria are already in place,
 - co-operation for dataflow between FSB and professional body,
 - spread of skills and knowledge between FSB and professional body,
 - more cost effective compared to regulatory alternative, and
 - becomes a self-regulation matter.

Opportunities

- registration with a professional body gives a career path not just a regulatory requirement,
- allows for qualification AND experience,
- possibility to provide exemptions to certain people (funeral) or level of person i.e. clerks,
- diversifying the reach of the professional body,
- building on existing model,
- better clarity on roles,
- streamline compliance administration for FSB,
- opportunity within market conduct across other legislation,
- career paths and professional development and maintain standards,
- increases accountability of those being regulated,
- opportunity to have better take up on global development and requirements,

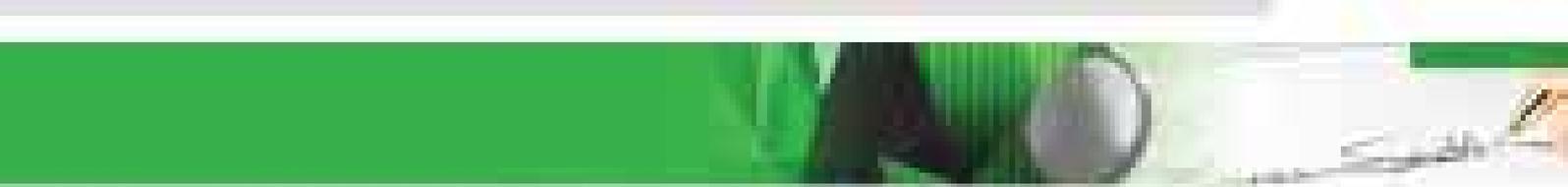
- risk based approach rather than one size fits all,
- freedom of association,
- training opportunity,
- possible model for solutions on RE2 exams, and
- effective follow through on undesirable business practices.

Threat

- fees may be an obstacle if made compulsory,
- possible relinquishing of control,
- FSP buy-in and will to do it themselves vs professional body model,
- blurring of roles on disciplinary and sanction process,
- barriers to entry and impedes freedom of association,
- conflict of interest,
- limitation on the number of professional bodies,
- inexperience of new bodies,
- not covering all areas of license categories,
- reaction time slower based on possible lag at professional body,
- cost to professional bodies,
- duplication of records, and
- impact on FSP man hours.

Weaknesses

- perceived costs,
- ‘forgotten sub-sectors’,
- Are there enough professional bodies?
- Do the entry levels of professional bodies create barriers to entry?
- possible increased employer cost,
- FSB does not see the handiwork of each Representative or KI in terms of arbitration,

- 
- professional bodies vested interest,
 - replicating an existing system,
 - professional body does not remain relevant to their industry,
 - FSB making SAQA requirement not compulsory, and
 - proliferation of controlling bodies.

So where do the second level (product knowledge) exams fit into this model?

Well with the RDR proposals around insurers (and by default UMAs) having to take responsibility for the product knowledge of their brokers which will be done by extensive and on-going training with brokers Representatives it is logical to take the view that this training could tick both the need for on-going development (CPD) and product knowledge at the same time thus negating the need for both as was originally envisaged.

We have also recently seen an increased activity from insurers on educating their brokers on regulatory matters via formal publications - the most recent of which was Zurich – and we expect to see more of this going forward.

Is it a good idea?

This structure is also far more cost effective for the brokers as they will have access to free (we assume) training on product provided by the insurer although there will be other CPD offerings available that will be provided at a cost as not all CPD need be product based. In fact we anticipate there will be a minimum of product based CPD out of a total required.

There will be an annual cost to be a member of a Controlling Body which will need to be borne either by the individual or their employer but far cheaper than the alternative of an FSB based admin structure with all the costs associated with that which would simply flow into revised annual levies.

The system would be run by bodies that have experience and systems in CPD delivery as opposed to the FSB that currently have no practical experience or infrastructure.



At this stage we believe the proposed structure, notwithstanding the threats and weaknesses highlighted above, will work and is a good solution to the likely horrors of second level REs and FSB run CPD.

Will there be an impact on the other Fit & Proper standards?

There was a hint that the current “specific” and “generic” qualifications may need to be reassessed to better fit with the proposed CPD and removed second level RE structure. Details are sketchy so best not to speculate at this stage but the end result may well be a much better aligned study program for people coming into the industry.

When will it start?

The FSB are aiming to have the system ready for implementation by the end of 2015. A tall order given everything else on their plate and past missed deadlines but there seems to be a renewed enthusiasm at the FSB that is driving the attainment of these deadlines so it may well happen.

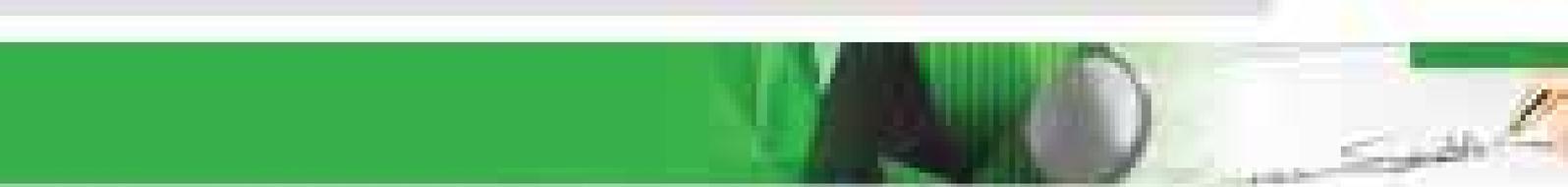
We will keep you posted.

FAIS Information circular 11/2015

The FSB have introduced an upgraded range of contact e-mail addresses to be used in differing submissions to the FSB. The detail is of more use to ourselves in processing the various submissions we undertake on behalf of clients so we are not going to reproduce them here. [Click here](#) to view the details.

From the Financial Intelligence Centre

The new CIPC electronic documents being used can now be accepted by Accountable Institutions. This follows Public Compliance Communication (PCC) number 24 having been issued by the FIC that allows the use of these new electronic documents for verification purposes for companies and existing close corporations.



And on matters FICA here is an article on two recent fines dished out locally for non-compliance with basic FICA standards. [Click here](#) to read online.

From the FAIS Ombud

A copy of the latest Ombud Newsletter can be obtained by [clicking here](#). It is a summary of some recent Ombud rulings – always useful to check your own procedures to see if you would have stood the test of the Ombud’s questions in similar circumstances. Interesting that there is a travel policy case – we don’t see too many of those.

FANews gives a summary of a recent case involving poor risk profiling by the advisor. The article also keeps referring to TCF principals but this sale was done back in 2008/9 – when TCF was but an idea in the regulators offices, but what we assume the author is trying to highlight is what would have been the effect under the now TCF regime. Have a read and assess for yourselves. [Click here](#) to read the full article which continues on their website, and [click here](#) for the full determination ADD LINK

From the Institute of Directors

To quote from a recent IoD newsletter

“The structures, by means of which the drafting of King IV will be governed, have been set up and the project plan completed. The IOD have embarked on phase 1 of the project plan, which consists of a high-level desktop analysis, as well as mapping King III to local and international developments.

The King IV Project Lead is also currently conducting informal interviews with public sector organisations, business organisations and professional institutes represented on the King Committee. These interviews aim to serve as limited testing of the direction we are taking and preliminary exploration of the matters that need to be addressed in King IV.

The IOD are also planning to conduct an electronic survey amongst a wider stakeholder base, to guide areas of focus and pre-empt opinion prior to finalisation of the drafting

process.

Working groups of technical contributors are then planned to commence in March 2015.”

With the governance components of the new market conduct regulations likely to affect a much wider spectrum of financial sector companies’ developments in King IV should be having a bigger audience than in the past.

Interesting things we have read:

Insurance Gateway

We have been encouraging all clients to read the FSB’s discussion document on complaints handling within a TCF environment as this is the future of complaints management. We are encouraging them to interact with their IT providers as the old Excel spreadsheet monitoring system will not work going forward – especially for binder holders and UMAs. Article we read from Moonstone reinforces what is going to be needed. [Click here](#) to read it online.

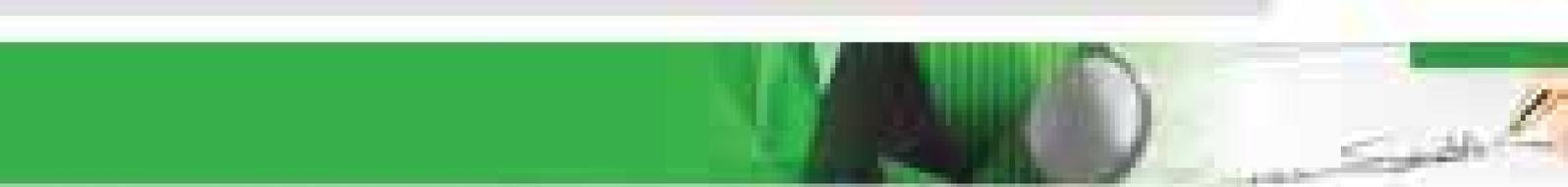


Business Day

A good article on what to do and what not to do with regards to setting up Twin Peaks legislation – let’s hope the FSB subscribe. [Click here](#) to read online.

More on Twin peaks from FA News: [Click here](#) to read the full article which continues on their website.

Yet more from FA News on how the soon to be rebranded FSCA, the Financial Sector Conduct Authority, or as some are starting to refer to it: “FiSCA” (because it’s easier to



day we assume) will actually look at market conduct. [Click here](#) to read the full article which continues on their website.

RiskSA

An article on the need for disclosure under the CPA. The case highlighted in the article involves insurance on a cell phone that was sold via a call centre and is worthy of a read by all clients involved in call centre based sales. [Click here](#) to read more.

*Johannesburg Address:
Ground and First Floor Building B,
RPA Centre,
180 Smit Street,
Fairlands, Johannesburg*

*Email:
info@associatedcompliance.co.za*

*Tel:
011 678 2533 and 011 431 1183/4*

*Fax:
011 678 7731*