



ASSOCIATED COMPLIANCE

FOR A COMMON PURPOSE

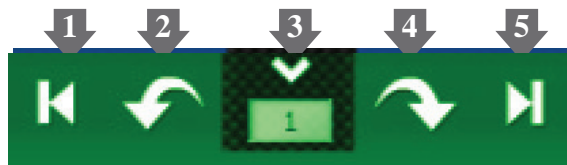
# Instructions

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## FROM AC

### Regulatory changes

We have completed our series of presentations on the proposed regulatory changes previously dealt with in our January Newsletter. The presentation can be downloaded from the News section of our website.

We have submitted our comments on the proposed changes under both the Insurance Regulations and Policy Holder Protection Rules, having already submitted commentary on both the draft Fit and Proper changes as well as the second draft of the Conduct of Business Report.

We must admit that we are a little disappointed at the lack of input from clients where we offered to submit on their behalf following discussions at the various workshops. Acceptance of the inevitable perhaps? Or reliance on others to fight the battle?

On the subject of fighting the battle, we are aware of meetings held with the FSB by both the FIA and SAIA but little has emerged into the public domain as to the content or results of the meetings. We would think the FSB is likely to await the feedback from all other quarters before committing to any formal responses.

### Exam and RE exam deadline 30 June 2017

This deadline is only four months away! We have sent reminders to affected clients and will review registers during monitoring visits. It is vital that FSPs (specifically the responsible key individuals as well as representatives themselves) conduct their own assessment. Anyone appointed before June 2015 has a RE5 deadline of June this year. Completion of a qualification will be necessary by June this year if first appointed in the first half of 2011 if the individual did not have an approved qualification.



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## Protection of Personal Information Act (POPIA)

The fifth in our series on this subject follows. Before you start reading, there have been some developments in the last few weeks that have relevance:

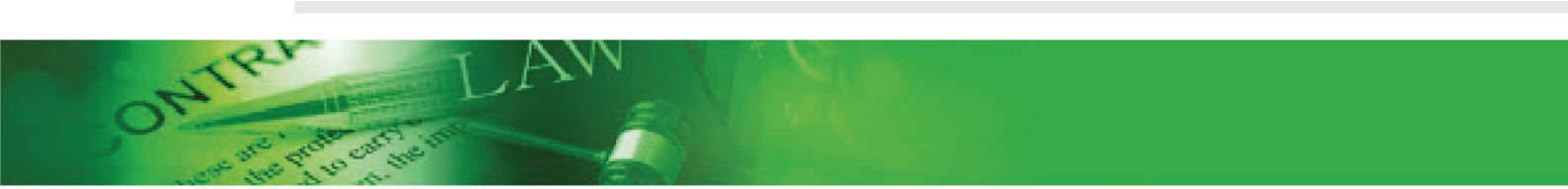
The first is that the regulator would prefer us to refer to the Act as POPIA and not POPI, so we will oblige.

The following is a release from Michalsons Attorneys:

“Michalsons has just attended the media briefing given by the Information Regulator in Cape Town. We were pleased to engage with this newly appointed, energetic and committed team.

Here are a few key points from their presentation:

- Their **website** has been launched.
- The Information Regulator has been working on draft regulations that will most likely be tabled in Parliament in around six months' time.
- They indicated that they hoped that the POPI commencement date would be before the end of 2017, but may only be in 2018. Whilst they understand the need for certainty they are unable to commit to a date at this point in time.
- They stressed the importance of the balance between PAIA and POPIA.
- The Information Regulator indicated that they would be undertaking a benchmarking exercise to look at other data protection laws, such as those in UK, Germany, Mexico and selected African countries.
- The Honourable John Jeffries, Deputy Minister of Justice, noted that with the POPIA enactment coming, both public and private bodies should prepare to comply and that there was no reason to delay compliance efforts.
- They stressed that they wanted to be transparent and open and welcomed engagement with industry sectors and other stakeholders”.



[Click here](#) for a further article on this news conference from Webber Wentzel.

The website also deals with the Promotion of Access to Information matters, which make sense given the possible conflict between the principles of the two different pieces of legislation.

We would caution against relaxing because of the “end of 2017, but may only be in 2018” statement. Developing these controls will take time so it makes sense to start to develop a framework now rather than waiting.





# PROTECTION OF PERSONAL INFORMATION ACT (POPIA): ARTICLE NO. 5

## **Quality of Information**

Condition 5 of POPIA deals with the quality of the personal information collected and processed by responsible parties.

Personal information must be complete, accurate, not misleading and up-to-date. The quality of the information processed is important to enable the responsible party to achieve the purpose for which it was collected, and to ensure that the data subject is not prejudiced because of incorrect processing of his/her personal information. For example, if the responsible party has the incorrect postal address resulting in them not receiving critical information for the fulfilment of a contractual obligation.

The commercial or financial value of data is also undermined if the quality of the information is poor. Any person or entity collecting and processing personal information should therefore be mindful of the importance of maintaining accurate and up-to-date information. Opportunities and mechanisms to verify the personal information should be sought as often as possible.

Section 16 of POPIA requires that responsible parties take reasonable steps to ensure that the personal information in their possession is accurate, complete, not misleading and up-to-date. Consideration must also be given to the purpose for which the information is collected or further processed to ensure that the personal information collected and processed is not excessive but necessary to achieve the purpose for which it was collected.



## What is good quality data?

Personal information collected and processed must be **complete** and not **misleading** as partially complete information may be misleading for parties entering into a contractual relationship where full disclosure of information is necessary.

Accurate information is essential to ensure that unnecessary mistakes are avoided such as the delivery of goods and services to the incorrect address. Outdated and irrelevant information should also be removed to ensure that only updated and accurate information is processed.

Maintaining updated personal information can be challenging especially where limited interaction takes place. Because of the nature of personal information such as addresses, phone numbers and e-mail addresses, changes may happen relatively often and personal information can become outdated quickly. It is important that reasonable steps are taken to update personal information whenever possible.

When a responsible party becomes aware that personal information is inaccurate or incomplete, steps should be taken to update it. Once again, consideration should be given to the purpose for which the information was collected, and whether such information is still required to achieve the purpose.

Data subjects are entitled to access their personal information and to request that their personal information be corrected, reduced or deleted.





## Records of Changes

POPIA requires that records of processing operations be maintained. These include records of the identity or categories of third parties who have or have had access to a data subject's personal information.

Updating personal information is also regarded as a processing activity, and therefore records of changes made to the personal information collected and processed must be maintained. It should be reflected in the records where information was inaccurate or outdated to ensure that the reason for the change is clear and not misleading.

## Steps to becoming compliant

Responsible parties in possession of personal information need to consider the quality of the personal information they have.

1. Consideration should be given to the purpose for which the personal information was collected. Is it still justifiable and necessary to keep it? If so, is it correct, complete and accurate, or does it need to be updated?
2. If the personal information processed by the responsible party is inaccurate, incomplete or outdated, what are the potential risks to both the data subject and the responsible party? If the risks are significant, urgent steps should be taken to verify the personal information.
3. Consideration needs to be given to the most effective and efficient mechanism to verify the accuracy and completeness of the personal information including direct contact with the data subjects or verification against third party databases (with the data subject's consent).



## What is a Direct Marketer?

This is a question we debated ourselves following a discussion at the Compliance Institute's FAIS forum. Surprisingly, there was little consensus on the question at the forum so input was requested from the FSB to see if they can provide any practical guidance. We have documented our own view on this question which differs from some other compliance practices/officers. We have done so from the perspective of a broker:

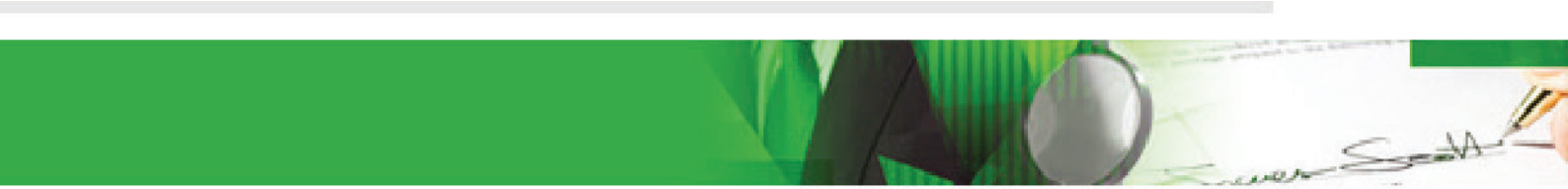
Direct Marketing includes:

- Upselling via telephone from a broker's current client base with reliance on voice logging and no subsequent section 8 and 9 General Code of Conduct follow-ups irrespective of whether the sale is successful or not
- Sales to new clients, irrespective of how and where the lead comes from, with reliance on voice logging and no subsequent section 8 and 9 General Code of Conduct follow-ups
- Other methods (as per the definition) that can be followed would include internet, media insert, direct mail or electronic mail that contain transaction requirements

We also debated the term predominant to decide whether to record the Direct Marketing status in the FAIS profile. This would have to be assessed for each client. These factors would have to be considered:

- Number of representatives, as a percentage of the total number, devoted to the above activities
- Percentage of business generated from the above activities
- Once-off marketing plans which are time related

Where appropriate, we will discuss this view with affected clients.



Following on from this we will now be discussing how best to monitor direct marketing operations, specifically the call centre format, in light of TCF standards and the possible introduction of the Execution of Sales process and Tier 2 products (See AC Special Newsletter November 2016 for details).

## **Industry FSP statistics**

We have been publishing these statistics from Pi Financial Services Intelligence for some time. The latest set can be downloaded by [clicking here](#). We are often asked if we see the results of the regulatory change in less FSPs. We have been seeing a fair amount of consolidation at broker level, but equally see lots wishing to enter the market and when reviewing the statistics, it's easy to see that those licenses "leaving" the market is less than those "entering." This is consistent across all license categories. Exactly what is behind the numbers can't be established, but on the face of it the industry, based on FSP licenses anyway, is not shrinking.

## FROM AC HAS

Most of you would have attended the workshops offered by Associated Compliance on the draft Regulatory Changes during February. Further to the January 2017 newsletter as well as the HR Action to-do-list, we will now start with the practical implementation of the changes on the HR front. This will be dealt with over the next couple of months in the newsletter.



AC HUMAN ASSETS SERVICES

These changes will by no means happen overnight. In order to try and put some structure in place, we will start to look at the changes in the licence categories. The introduction of the Tiers and some new definitions will result in your HR department having to apply some thought to several areas that may be affected by these changes.

You will have to work with your compliance officer to ensure that Representatives and Key Individuals are correctly categorised on your representative register.

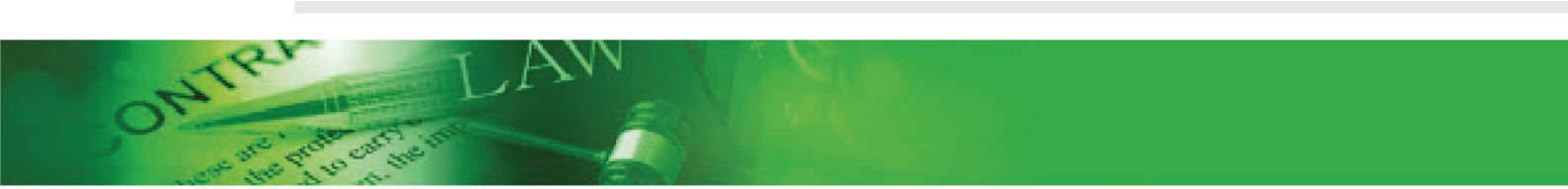


*Please refer to the AC Special Newsletter for details of the changes in the licence categories.*

For any changes to any individuals, please remember to issue new mandate letters. Please ensure that your Representatives/Key Individuals understand these changes. Copies of the mandate letters must be kept on your employee's personal file. Some of the HR implications that come to mind for these changes, are:

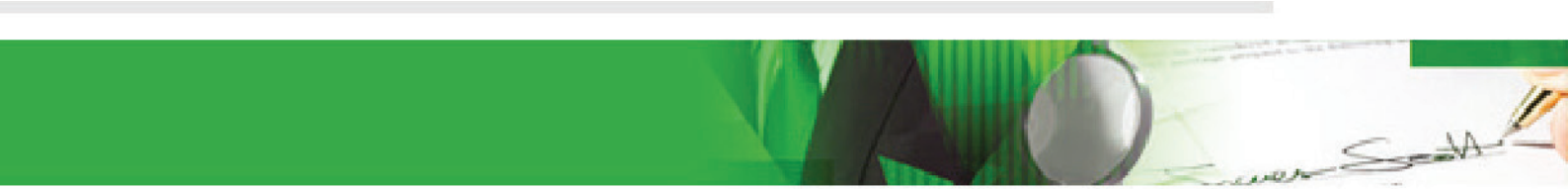
**Possible HR implications with regards to licence categories:**

Changes in role/ responsibilities	<p>The requirements for the licence categories that a representative or Key Individual are <u>currently registered</u> for, may change because of the amendments. A Representative or Key Individual may currently have experience and/or qualification requirements, but with the amendments, some or all of these could have changed and/or received exemption.</p> <p>The employer, where applicable, will have to consider the implications of these changes, and may need to look at alternatives if the requirements of the role have decreased.</p> <p>Current job descriptions will have to be amended if specific mention was made around licence categories and related requirements.</p>
Key Performance Areas	Should there be any changes in a role, these may have an impact on the individual's key performance areas, which may have to be altered.
Qualifications	The employer might find themselves in a position where a Representative or Key Individual is currently fulfilling a qualification requirement, but the qualification requirement has fallen away. The employer will have to come to a decision on how to deal with such a situation. Will the employee continue the studies and will the employer continue to pay for these studies?



<p>Skills development</p>	<p>Each licence category will be linked to CPD training. The employer will have to determine the number of hours required for each registered Representative and Key Individual. Your HR department will in all likelihood be responsible to monitor this training as the training must be included in your INSETA Workplace Skills Plan and reported on in your Annual Training Report. Do you have such a plan?</p> <p>The employer must take note as to whom the CPD exemptions apply.</p> <p>It is likely that your Representatives and Key Individuals may all have to belong to a professional body who will track all CPD activities. This could imply that your company may have to pay for all these memberships.</p> <p>The employer will have to include these required hours and costs into its annual Training budget.</p>
<p>Recruitment</p>	<p>Representatives and Key individuals on your register must actively be rendering services in the listed category. Simply being on the register, but not actively working in that category will no longer be acceptable. It is advisable that specific questions get included in your pre-employment reference checking with the previous employers that the individual has, in fact, actively operated in the areas as disclosed by the candidate. An amended sample Reference Checking document has been placed in the <b>HR Manual</b> on our website. It can be found under: <b>Recruitment and Selection/ Sample Reference Check.</b></p>





If you encounter any other challenges that have not been listed, please let us know so that we can assist and/or share the information.

Associated Compliance has recently met with the FSB and it seems that the implementation date might move back a bit – we think around about July this year. While this will be good news for some, let's not leave all the work to the last minute! This slight delay gives us adequate time to plan effectively which will ensure that our practical implementation is well structured and in place when the rules go live!

Should you have any specific questions with regards to any other HR matters, please send these to:

[bronwynn@associatedcompliance.co.za](mailto:bronwynn@associatedcompliance.co.za)

[has@associatedcompliance.co.za](mailto:has@associatedcompliance.co.za).

## FROM AC-PROOFED

### Designing an Exceptional PowerPoint Presentation

These days, presenting your case often means creating a presentation using PowerPoint. We've all seen far too many really bad presentations, and I'm going to tell you how to not be "that guy" and fall into the same trap.

The first thing you need to do is to work out what you will be telling your audience. All the bells and whistles in PowerPoint can make you forget that you still have to say something that will make them sit up and take notice. Using fancy graphics with too much animation doesn't relieve you of the responsibility to carefully plan and organise the text. Remember: the medium is not the message!

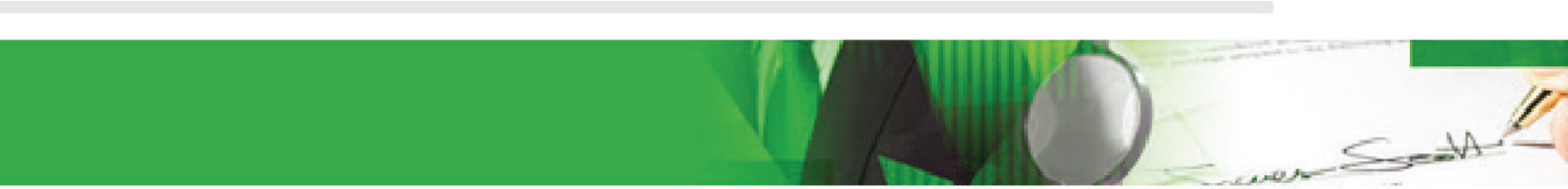
Basically, all presentations need a few things: an attention-grabbing opener, a brief overview of the topic, what your audience have come to find out, how your solution meets that need, how they can implement your solution, and a summary and conclusion.

Your presentation needs to flow logically so that you don't lose your audience. Also, what you are telling them must be simple and organised. Remember that if you want to wow them, you must know your product, service, or solution exceptionally well.

Start creating your presentation without thinking about the visuals or effects. It will be so much easier if you make it like a story with a beginning, middle and end. Kind of like a "Once Upon A Time"!



**AC-PROOFED**



Remember that your audience didn't come to read, and if that's the case then you might as well have emailed the presentation to them. We read faster than we listen, so if your slides have paragraphs of text on them, you'll lose your audience. Keep the number of words on each slide to an absolute minimum.

If you use slide transitions, stick to only one. If each slide pops up in a different way than the last, your audience may get dizzy, lose track of what you're trying to tell them, and soon they'll be taking bets on whether the next slide is going to bounce in or fly in from the left or right.

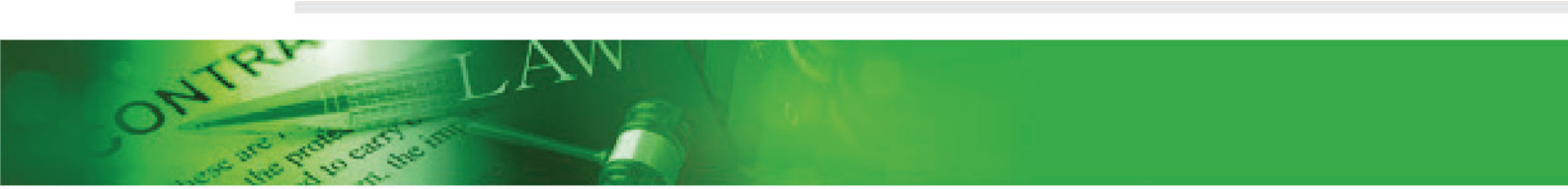
Fancy fonts do not add impact. Choose a simple font like Arial or Helvetica, and stay with it for the whole presentation. Whatever you do, DON'T use Comic Sans! It happens to be the ugliest font ever created (check out [www.comicsanscriminal.com](http://www.comicsanscriminal.com)).

You're not finished yet! Now you need to add visual elements that pack a punch.

Think about the colour first because it affects the background or template that you use for the entire presentation. Whichever colour you choose, make sure that all your text contrasts enough with your background to be easily legible.

It's generally best to use a darkish background because light colours can be too bright and may make your audience whip out their Ray Bans for the occasion. Medium backgrounds can also work when you want a softer impact. Just make sure that the guy at the back of the room can read the text.

The most professional-looking backgrounds are photographs or textures rather than solid colours. You can fiddle with photos in photo editing software to soften and colour them to your chosen background colour. Avoid cartoons and clip art, and make sure that your images aren't too low res as they'll look worse on the screen than they do on your laptop. Don't overdo the graphics, and whatever you do - don't use images that have watermarks on them.



If you need to use graphs in your presentation, please don't make them too busy. Keep it simple, and again remember the poor guy at the back of the room!

- Avoid using too many bullet points.
- Avoid using too many bullet points.
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- Avoid using too many bullet points.

Oh... and one last thing. PowerPoint has a Spell Check option. Please use it!

And if you need help with your PowerPoint presentation, I'm at the end of a phone line!  
Contact me at [ac-proofed@associatedcompliance.co.za](mailto:ac-proofed@associatedcompliance.co.za) or 083 657 3377.



## FROM THE FSB

### **Twin Peaks**

Still not clear on what this is? Or confused by what you read? Then [click here](#) to have a look at a short video clip of an interview on SABC News with Jonathan Dixon.

### **New job for Jonathan Dixon**

Mr Dixon, currently the Deputy Executive Officer for Insurance at the FSB, has been named as the next Secretary General for the International Association of Insurance Supervisors (IAIS), based in Basel, Switzerland. The IAIS is the international standard setting body for the supervision of the insurance sector and he is the first person from an emerging market country to hold this position. [Click here](#) to download the full press release.

He has been driving this relay race for the first three legs and will now be handing over to someone who will need the renewed energy to cross the finishing line.

### **Fine for not following PPR**

Lombard Life received a R150,000 fine for failing to correctly comply with PPR regulations on the content of claims repudiations. [Click here](#) to download the notice. We would imagine it is a simple process to make sure that a letter follows the required standards. We recently came across another insurer's letter that falls short of these standards, so whether you are an insurer, UMA or broker you would be wise to check the structure of letters you issue/receive to see if they do meet the necessary requirements.



## Appeal Board decision confirm the expectations on a key individual

On 18 November 2016, the Appeal Board of the FSB dismissed an appeal brought by Willem Daniel Jonker (Mr Jonker) against him in April 2016.

The Registrar debarred Mr Jonker (sole key individual) of Interneuron (Pty) Limited because he no longer met the Fit and Proper requirements contemplated in terms of section 8 of the FAIS Act.

[Click here](#) to read the full media release. The FSB's original decision upheld by the Appeal Board found that:

“following an inspection into the affairs of Interneuron during 2012, where the FSB found among other things that one of their clients sustained substantial losses after the management of the client was entrusted to a representative of Interneuron. The client experienced trading losses and substantial amounts of the client's investment were transferred to another client over the years. The representative falsified investment reports to the client regarding the performance of the investment. Interneuron also invested the client's funds in unsecured loans. These investments were outside the parameters of the client's mandate to Interneuron.

In short, the Registrar debarred Mr Jonker, not because she attributed the representative's dishonesty to him, but rather because **he had a legal duty in his capacity as key individual to manage and oversee the activities of both Interneuron and the representative. Further, that legal duty required him to act with due care skill and diligence in terms of the FAIS Act. It is the failure in that regard which contributed to the substantive losses sustained by the client.**” [AC's highlighting]

This decision clearly sets out the responsibilities that a key individual has, and while these responsibilities can never allow a person from being appointed as such as it is their role that demands appointment, it should serve to remind key individuals that the role is practical and not ceremonial.





## **FSPs licence name V FSPs registered name V FSP branding/ name used**

There has been further discussion with the FSB on this matter which can be summarised as follows:

- The FSB acknowledge that CIPC DO NOT register trading as names.
- They also acknowledge that this could raise a problem when it comes to name approval with the insurance division as any submitted documents will not refer to a trading as name. This must be countered with a fully completed FSP1 where Q1.2 has details of an intended trading as name and this would also be used for any licence application or profile change.
- Where the trading as name uses the terms Insure/Underwrite and the like and these do not form part of the registered name i.e. have not been previously approved, then this would need to be referred to the insurance division for approval.
- Where a trading as name is not included in the current licence name, a profile change must be submitted with the necessary fee of R731.
- Where multiple trading as names are used, all must be registered. This includes where the English and Afrikaans derivatives of a name are used, e.g. ABC Brokers and ABC Makelaars.

Now that we have full clarity, we will be looking at clients that may have a “missing” trading as name so that the necessary updates can be processed where needed.



## FROM THE FIC

The FIC will be hosting what they refer to as Registration sessions at the following venues;

1. Emperors Palace in Johannesburg on Tuesday, 7 March 2017, 08:30 to 15:00
2. Royal Elephant Hotel in Pretoria on Thursday, 9 March 2017 08:30 to 15:00

If you need to register or have experienced problems with your registration, this may be the ideal opportunity to resolve any problems you may have.

To quote their notification document:

### **INVITATION**

### **FIC REGISTRATION SESSIONS**

**THE FINANCIAL INTELLIGENCE CENTRE (FIC) WILL BE HOSTING TWO REGISTRATION SESSIONS IN GAUTENG FOR INSTITUTIONS TO REGISTER FOR THE FIRST TIME OR TO UPDATE THEIR REGISTRATION DETAILS WITH THE FIC, ON THE GOAML PLATFORM.**

The registration sessions will be held at

3. Emperors Palace in Johannesburg on Tuesday, 7 March 2017, 08:30 to 15:00
4. Royal Elephant Hotel in Pretoria on Thursday, 9 March 2017, 08:30 to 15:00

Each session is 30 minutes and those wishing to take advantage of this opportunity will need to book an appointment.



## IMPORTANT INFORMATION:

- Book appointment **online** only
- There are limited slots available, so book as soon as possible
- Click on the “**REGISTER HERE**” button below to book your time slot
- After making your booking, you will receive an e-mail confirming your successful booking
- Only those who have received a confirmation e-mail may attend these sessions and only they **will be assisted during their allocated time slot**
- Bring along your confirmation e-mail to the venue
- Bring with you a copy of your ID/Passport document
- Also, a signed authorisation letter containing the details of the Reporting/ Compliance Officer
- Sessions are booked by appointment, please be on time for your allocated time slot
- For any queries contact 0860 222 200

[Click here](#) to follow a link to enable you to book a session for the Invitation FIC Registration Session.



## FROM DEPARTMENT OF TRADE AND INDUSTRY

### **New regulations for the Credit Life Insurer**

What was referred to as the “Final Credit Life regulations” were published on 9 February 2017 and will become effective for all new contracts from August 2017. They effectively set the maximum rates that can be charged for a range of different credit agreements ranging from home mortgages to unsecured credit agreements. They also detail various cover provisions that must be made and what cover limitations and restrictions are allowed. This is over and above the RDR restriction of commissions to 7.5% from the lofty heights of 22.5%!

Is this a step too far from the Regulators to dictate such detail to an insurer? Or is it the expected consequence of undesirable business practices by insurers? Can we expect to see similar interventions in other sectors/products in the future given the Regulator’s focus on the Conduct of Business legislation?

[Click here](#) to download a copy of the Credit Life Regulations.



## FROM THE IISA

As we visit our clients we are often asked to explain the IISA CPD requirements and how this will be different from the FAIS CPD standards. The comparison to FAIS should start to become clearer given the recent release of the draft Fit and Proper amendments that incorporate CPD standards for FAIS.

The professional IISA member often seems at a loss to how to achieve their IISA requirements, despite ongoing communications from the IISA. As the loss of a professional designation may well cause scrutiny from the regulator soon, we would urge all key individuals and representatives who hold a professional designation (either from the IISA or the FPI) to ensure that they achieve and maintain their professional designation by making sure that they achieve their CPD requirements.

[Click here](#) to download a copy of the ongoing communication from the IISA on CPD events. Not being members of the FPI we don't have ready access to their communications but their website would indicate that they follow a similar pattern.

Access to these facilities for clients outside Johannesburg is still an issue, but we do know that the professional bodies are working on increasing remote access to all their offerings.

## INTERESTING THINGS WE HAVE READ

### Insurance Gateway

A number of articles from Moonstone.

An article on the current rigours of having a debarment lifted:

[Click here](#) to read the article.



An article on the current regulatory status on the premium collection process:

[Click here](#) to read the article.

An article dealing with how the new regulatory structures will deal with introducing new regulations:

[Click here](#) to read the article.

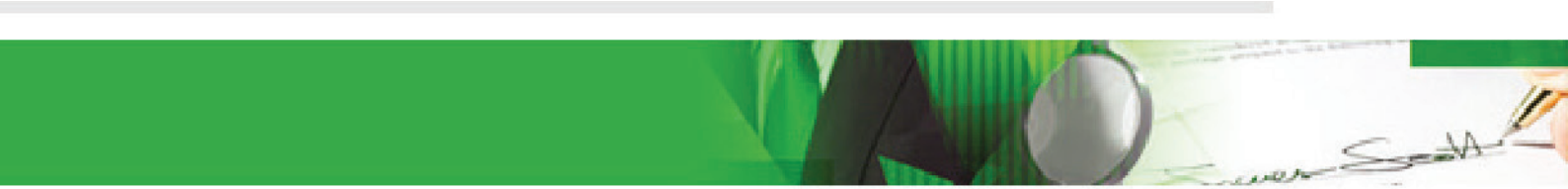
Robo-advice: the issues to think about:

[Click here](#) to read the article.

On the subject of Robo-advice, here are details of one broker going down that road:

[Click here](#) to read the article.





**King IV - a missed opportunity:** an article by Dr Eric Levenstein of Werksmans Attorneys about some of the shortfalls, in his view, of King IV. Given that all FSPs will soon be developing their own Governance framework, this is useful background reading:

[Click here](#) to read the article.

**SAIA have developed a mobile application aimed at promoting financial literacy around short-term insurance for consumers.** Something that can be used by FSPs as part of their interactions with clients maybe? Worthwhile having a look.

[Click here](#) to read the article.



## FANews

There are many general articles on the potential fallout from RDR, Twin Peaks and the like. Here is one of them, an interview with Leanne Jackson of the FSB.

[Click here](#) to read the full article which continues on our website.

The February 2017 edition of the **FANews** and **FAnuus** magazine is out and also available digitally. Simply click on the magazine name to view the magazines online or if you prefer to download simply [click here](#).

And finally an article from Patrick Bracher on **his (and we stress his)** views on the legality of the proposed PPR and Insurance regulations. We don't want to get into a debate with Mr. Bracher on these views as in our opinion they, shall we say, are not correct and maybe intentionally provocative but we hope the FSB will build their response into the feedback they provide to the market place. [Click here](#) to download a copy of the article that has been available on a number of public domains.



***Johannesburg Address:***

***Ground Floor***

***Lakeview House***

***Constantia Office Park***

***Corner 14th Avenue and Hendrik  
Potgieter Street***

***Weltevreden Park***

***Roodepoort***

***1709***

***Email:***

***[info@associatedcompliance.co.za](mailto:info@associatedcompliance.co.za)***

***Tel:***

***011 678 2533***

***Fax:***

***011 475 0096***

***This Newsletter was proofread by Kim Hatchuel of AC-Proofed.***

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