

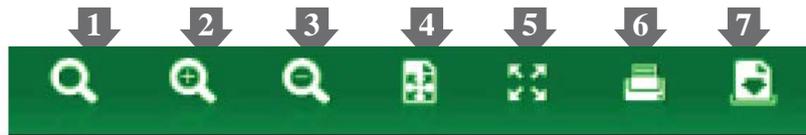


ASSOCIATED COMPLIANCE

FOR A COMMON PURPOSE

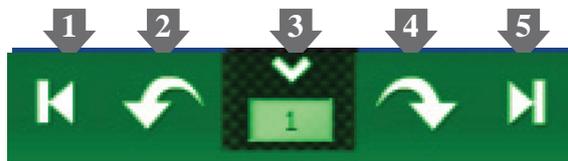
# Instructions

All the text in red are links. Click on that text to go to the 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 the specific page
- 4 = Go forward a page
- 5 = Skip to the last page

Alternatively, click and drag on any corner of the pages with your 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 AC HAS](#)  
[Page 8](#)

[From AC Proofed](#)  
[Page 11](#)

[From the FSB](#)  
[Page 16](#)

[From the FIC](#)  
[Page 18](#)

[From the Financial  
Sector Charter Council](#)  
[Page 20](#)

[From the FAIS OMBUD](#)  
[Page 22](#)

[From the FIA](#)  
[Page 22](#)

[From SAUMA](#)  
[Page 22](#)

[From the Short-term OMBUD](#)  
[Page 23](#)

[Interesting things we  
have read](#)  
[Page 24](#)



## From AC

### **Moving a book of business by a broker**

Over the past few months, you may have been following a series of articles in FAnews written by Ms Juanita Moolman, a partner at Webber Wentzel, relating to the legalities of moving a book of business.

In no way do we wish to be critical, but the articles are a little difficult to understand due to the very nature of the legalese involved. Furthermore, the article deals with all variations, including one insurer taking on the unexpired risks of another insurer. The articles are well worth a read and should be used as a point of reference whenever a broker is considering such action. [Click here](#) to read article 1, [here](#) for 2 and [here](#) for 3.

However, we thought it would be prudent to clarify the responsibilities of a broker in the most common occurrences, which are when:

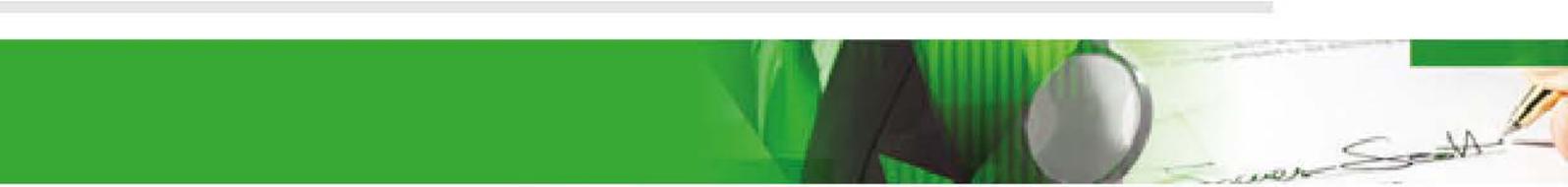
1. A broker with a binder wishes to move the business on that binder to another insurer, and
2. A broker with a portfolio of business with one insurer wishes to move that portfolio to another insurer.

Most brokers are appointed by policyholders as non-mandated intermediaries, which means the they do not have an open mandate to manage a policyholder's insurance portfolio. This further implies that any amendment to, or change in the portfolio including moving the policyholder from one insurer to another, must be specifically authorised by the policyholder.



**ASSOCIATED COMPLIANCE**

**FOR A COMMON PURPOSE**



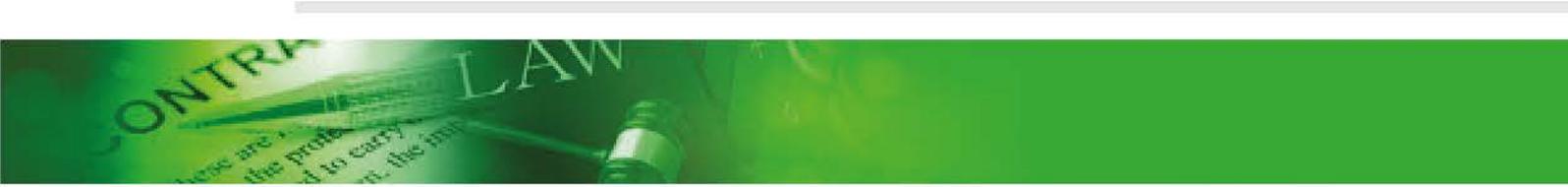
In view of the above, a broker is not entitled to move a policyholder's insurance cover from one insurer to another without obtaining specific permission from the policyholder to do so. Therefore, if a broker wants to move cover to another insurer, proof that the policyholder consented to such change must be provided by the broker.

The FSB also expects the insurer to obtain proof of such consent before the insurer allows such a cancellation of insurance cover. If a broker does not obtain the necessary consent, the insurer is entitled to contact the policyholder directly.

In addition to the above requirements, policyholders must be informed of their options, including being provided with a comprehensive comparison of the terms and conditions which apply to the old policy and the replacing policy.

The client must also be given appropriate time to be able to make an informed decision. If the policy is in the name of a natural person, the policyholder protection rules apply in this regard.

Next month we will deal with issues relating to when a UMA seeks to change risk carrier.



## The new FIC Amendment Act: What next?

There is more reading on the new amendment act under the From FIC section, but here is an overview of the processes we are engaged in to prepare for the implementation of these new standards:

- i. Initially we will assess the Guidance that is needed to ensure that we comply with our responsibilities in terms of Annexure A of our 2017 SLA. This will take the form of a summary of the key requirements of the Act that allows you to understand the new requirements and develop your own Risk Management Plan and amend your current procedures to align to the new standards. This broad overview will be specifically aimed at our Accountable and Reporting Institution clients.
- ii. A similar format will be produced for our non-accountable institution clients, who are primarily focused on Short-term Personal and Commercial Lines business. Currently (and we emphasise that this will change) they need only worry about the 'suspicious and unusual transactions' elements of the Act.
- iii. We believe that the Long-term insurers and finance houses will now be developing their own risk-based approaches, as demanded by the Act, which will flow through to our clients and therefore there should be no need for clients to develop their own generic risk rating model but rather adopt the standards that they will need to adhere to whilst transacting business with insurers and banks.
- iv. We continue with our stance that we cannot be the appointed FICA Compliance Officer or Money Laundering Control officer for clients.
- v. Our Governance and Business activity monitoring tools used to report to clients as part of their compliance risk management plans will need to be adapted to better monitor adherence to the new standards.

We will be running a series of articles from July to October (the effective date of most of the amendments) on key aspects of the changes to assist with a better understanding by all affected.

This approach will be further discussed with clients during the first monitoring quarter of 2017/18 reporting period (June to August) with the monitoring of actual implementation thereafter.



## **Can poor management of licence profile changes result in an irregularity report being submitted to the FSB?**

As you are aware, an FSP has a specific responsibility to ensure that their details are kept up-to-date with the FSB. The FSB recently reported that a failure in this regard is one of the biggest breaches of regulations they encounter.

There are various types of profile changes, but some have a greater regulatory risk for the FSP if they fail to process these changes correctly. These are:

1. New representatives (juristic or natural) being allowed to act as such without being added to the register within the 15 days permitted.
2. New Key Individuals being allowed to act as such prior to formal approval by the FSB.
3. Addition of new licence category: Trading in a new category prior to formal approval by the FSB.
4. Addition of premium handling: Collection of premiums before the necessary guarantees, insurances and insurer approval to do so are in place.

It is vital that the necessary paperwork is provided to allow us to do the necessary processing and that you await the necessary approvals or confirmation of processing before allowing the above changes to take practical effect. This is an area we will be taking a much closer look at in the future.

## **Newsletter receipt and AC manual access**

We will be conducting an audit on these two services during the first quarter of the 2017/18 reporting period (June to August) to ensure that:

1. The staff that need to receive the Newsletter are on our mailing list.
2. All your staff that require access to the AC and AC HAS manuals have the required password.

## From AC HAS

We have received several queries lately with regards to employees in their probation period, and have decided to focus this month's article on this topic.



Most employers are guilty of leaving their new employees to settle in and find their feet for the first two to three months of employment, only to discover in or after the third month of employment that some critical skills are lacking or absent.

Newly appointed employees should all be given a probation period as this is the ideal opportunity for an employer to assess the employee's suitability for the position. The employer should fully utilise the probation period to evaluate the employee, because in terms of the Labour Relations Act (LRA):

- The reasons for dismissing an employee on probation for poor performance need not be as compelling as in the case of a dismissal after the probation period.
- Less technical procedures need to be followed that would be the case of a dismissal for poor performance after the probation period.

*Please take note that the purpose of the probation period is not to deprive the employee of the status of permanent employment. A person on probation is no different from a longer serving employee and the LRA emphasises that you must justify the dismissal of a probationary employee the same way you would justify dismissing any other employee, **except** when your reason is related to **poor performance or incapacity**.*

During the probation period, these are the things that the Manager should do:

1. Assess the newly appointed employee's ability to meet the work performance standards.
2. Communicate and document the required work standards (KPAs, targets/goals) with the new employee to ensure that the new employee is aware what is required of him/her.
3. Work closely with the employee to monitor and correct areas of poor performance.
4. Set target dates by when the employee should be fully effective.
5. Give appropriate feedback on a regular basis, document this feedback and set regular dates when these performance evaluations will be done.
6. If the employee's performance is below standards, the manager should arrange a counselling session with the employee.
7. If appropriate, the manager can extend the probation period.
8. Should the employee fail to improve his/her performance prior to the expiry of the probation period, the employer may decide to dismiss the employee, **after following the required processes.**

See: *Guidance Note on Performance Management during probation* (including all the required forms) for more detailed information, which is in the HR Manual on our website under: Performance Management/Performance Management during probation.

Keep in mind that the Labour Court always urges the employer to look at alternatives prior to dismissing an employee. If there are any other possible ways to remedy the matter, please consider - in the words of the Court in a response to the case of *National Union of Mineworkers & Another v Libanon Gold Mining Co Ltd (1994) 15 ILJ 585 (LAC)* "... to what extent his post could be adapted, and to the extent to which he could be fitted into the workforce in another capacity either then or in the future".





This is not always a possibility in an organisation, but record the fact that you as an employer, considered it.

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

## From AC-PROOFED

### Correct Punctuation is so IMPORTANT

Over the years, I have come to the conclusion that: a) correct punctuation is absolutely crucial to good communication, and b) many people still struggle with it (no matter what their education level is). Punctuation tells readers not only what we are saying, but *how* we are saying it. It affects clarity, tone and personality. Used correctly, punctuation can make writing easy to understand. Used incorrectly, it makes communication confusing. Perhaps more than anything else, when punctuation is used incorrectly, it can damage your credibility, and can change the meaning of a document, sometimes to your detriment.



**AC-PROOFED**

There's more to punctuation, of course, than full stops and question marks. We can all use those with our eyes closed. But I'm amazed at how many people get apostrophes wrong, and how few people actually know what a semi colon or an ellipsis is. It's also somewhat alarming how often commas are used when a full stop is needed.

There isn't enough space here for a complete list of punctuation, so I've only included the more contentious ones, and things to watch out for.



## Apostrophes

Where do I start? This must be the most misused punctuation mark ever!

Apostrophes denote ownership (to show that something belongs to someone) *We will go in Fred's car.*

They are also used for contraction (making two words into one). *Shouldn't. Didn't. Won't.*

### *Things to watch out for*

When writing the plural form of a word, keep apostrophes out of the picture. Otherwise, your message will look silly.

Pronouns (*its, his, hers, theirs*) do not need an apostrophe to show that something belongs to something else.

## Brackets

These are used to separate information that isn't crucial to the meaning of the rest of the sentence. If you removed the bracketed material the sentence would still make perfectly good sense.

## Colons

You use a colon when you are going to introduce a list: *like this.*

Also, between independent clauses when the second explains or illustrates the first. *I have very little time to learn the procedures: my new job starts in five weeks.*

The colon can be used to emphasise something at the end of a sentence. *After three weeks of deliberation, the jury finally reached a verdict: guilty of apostrophe abuse!*



## Commas

The most common use of a comma is to separate things in a list: *policy wordings, schedules, endorsements, and renewals.*

It's also used when you want to separate two sentences with a conjunction: *Most birds have separate toes, but ducks' feet are webbed.*

To separate parts of a sentence: *Bruce, hungry as he was, was shy to come forward and have a slice of cake.*

To indicate a pause in a sentence or question: *Sharon, did you remember to submit our financials?*

### *Things to watch out for*

Don't use too many commas. They are used to indicate a brief pause; they're not as final as full stops.

## Dash

This is a mark of separation stronger than a comma, less formal than a colon, and more relaxed than brackets. You would use it when you want to tell a reader that what they will read next relates to what they have just read, in an interesting way, and that you would like to emphasise it.

*The only thing Mike could do—if he could do anything at all—was to sit and wait for his exam results.*

### *Things to watch out for*

Only use one dash per sentence. More than that causes confusion about exactly what is meant to be set off by the dashes.



## Ellipses (...)

Ellipses are used when you want to leave out words from direct quotes (not to change meaning of course, but to clarify and condense). Don't make the mistake of using an ellipsis when you want to keep someone in suspense (I'm not sure what Jenny is trying to say ...).

Please only use three dots. Trailing off with more than three is just plain tacky.

## Exclamation Marks

A general rule of thumb is to only use one exclamation mark per document, if at all. Remember, when you emphasise everything on the same document, nothing becomes emphasised anymore. Too many exclamation marks just look like you're shouting (or being obnoxious, which may be worse).

## Full Stop

A full stop is used to end a sentence. Period!

### *Things to watch out for*

There is only once space after a full stop, and none before.

## Hyphen

If you use a hyphen in the word, it can change the meaning. *Re-form means to start again, but reform means change.*

A hyphen is used to spell out some numbers. *Thirty-two, forty-nine, eighty-six.*

### *Things to watch out for*

There are no spaces before or after a hyphen, unlike the dash which has been described above.



## Question Mark

Question marks are used when you're asking something. *Johan, have you paid that claim?*

## Quotation Marks

Quotation marks have an ability to imply sarcasm or to encourage readers to interpret the information for themselves. They are used around the words that someone has said, or direct speech.

You use them inside or outside the closing quotation mark depending on whether they are part of the quoted material. *Did he say, "Good morning, Dave"? No, he said, "Where are you, Dave?"*

## Semi Colon

A semicolon has two uses; only two.

Use it to connect two independent clauses into a single sentence. *I could tell that it was getting late; it was growing darker by the second.*

You can also use it when you want to separate items in a series when the items contain parenthetical elements within themselves. *The following staff members were present: John Doe, the boss; Right Hand Man, his 2IC; Poppy Dolly, their PA; Racing Driver, the chauffeur; Yummy Food, the cook and chief bottle washer; and one or two significant others.*

## What about punctuation in abbreviations?

When a word is abbreviated after the first three letters, the rule is to put a full stop after the abbreviation. *Inc. cont.*

When a word is shortened by using the first and last letters, you don't need a full stop. *Mr Dr (Pty) Ltd*

If there is anything else that you need assistance on, I'm a phone call (083 657 3377) or email ([kimh@associatedcompliance.co.za](mailto:kimh@associatedcompliance.co.za)) away.



## From the FSB

### Exam fraud

The long referred to investigation into possible exam fraud reached a climax this month with the FSB press release on the matter. [Click here](#) to read the release.

In the same week, we came across a case where we suspect there has been fraudulent activity - not with an examining body but by the person seeking to be appointed as a representative. We had not finalised the investigation into this matter at the time of publishing.

The FSB have had a busy month with numerous notifications being issued, although not all of them are that relevant to our core client base. Some of these less useful ones included:

- [SAM CPR reporting in terms of Financial Soundness Standards.zip](#)
- [SAM CPR Risk Free Rates and Equity Symmetric Adjustment.zip](#)
- [Press Release - Bophelo Statutory Manager.pdf](#)
- [Press Release - FSB Grants Granite Central Securities Depository Licence.pdf](#)
- [Press Release - FSB warns the public against Opportunities Investments trading as Opportunities Investments Stokvel Club.pdf](#)
- [Media Release- FSB warns the public against Ms Alicia Solomons.pdf](#)
- [Press Release - FSB warns the public against Q International Ltd also trading as Q Asia Pacific Ltd.pdf](#)
- [Press Release - FSB warns the public against Financika.pdf](#)
- [Press Release - FSB warns against illegal funeral policies – thirteen schemes under investigation.pdf](#)



Some of the more important ones:

- [Media Release - Update on Licenses for Financial Services Providers 11 April - 15 May 2017.pdf](#)
- [FSB Appeal Board Hearing Schedule - June to October 2017.pdf](#)
- [Press Release - FSB fines MET R20 000 for contravening the Collective Investment Schemes Act.pdf](#)
- [Press Release - FSB warning.pdf](#)  
(relates to the illegal use of the FSB logo/letter head)
- [2017.05.10 Insurance Bill to Committee.pdf](#)
- [2017.05.12 Final Insurance Bill presentation to SCOF.pdf](#)
- [Press Release - FSB fines Smart Life R150 000 for Long-term Insurance Act Contravention.pdf](#)

Another case of claims rejections not being handled in terms of PPR standards.

- [Press Release - FSB provisionally suspends JVN Asset Management Pty Limited - JVN.pdf](#)

A suspended licence because of the appointed KI and noted supervisor of two representatives not undertaking that role. We suspect that this is a rent a KI situation and illustrates the importance of KI and supervisory roles being taken seriously.



## From the FIC

### **The FIC Amendment Act No. 1 of 2017**

As many of you will be aware, due to the intense political debate and press coverage around this piece of legislation, this Act was published in the Government Gazette on 2 May 2017 and the Minister of Finance gazetted the implementation dates on 13 June 2017. In addition, the following drafts were also published:

- A Roadmap to implementation ([Click here](#) to download)
- Draft Regulations ([Click here](#) to download)
- Draft withdrawal of exemptions ([Click here](#) to download)
- Draft Guidance on Implementation ([Click here](#) to download)

The deadline for comments on the various drafts is 12 July 2017; very tight for such a major change. The target date for final implementation is 2 October 2017. While achieving target dates has never been any Regulator's best skill, we would recommend that you do not assume this date will be pushed out.

The basic principle that has been introduced and will demand a fresh approach by one and all, is that of a Risk-Based approach to customer due diligence, amongst other things. One of the many documents issued and available on the FIC Website is one entitled "A New Approach to Combat Money Laundering and Terrorist Financing". This document gives a good overview of the changes and process already followed and to be followed. [Click here](#) to download a copy.



A few interesting aspects we have picked up initially are that amongst the three key elements of a risk-based approach is: *“More customer friendly and less costly approach to implementation of AML/CTF (combatting the financing of terrorism) in line with Treating Customers Fairly initiative”*. We assume the reference to less costly will be the actual day-to-day management of the process once the new standards have been developed, introduced and staff trained. Initially all Accountable and Reporting institutions will be spending considerable time and money (be that direct or indirect) assessing the changes, designing their risk based approaches and launching with their partners and clients.

The other aspect that the Financial Sector Regulation Bill will introduce, amongst other things, is a change to the role of the Financial Services Ombud that will allow them to deal with complaints *“relating to termination of, and refusal to enter into, business relationships in respect of individual customers, potential customers and Prominent Influential Persons”* (a new category of person introduced by the FICA Amendment Act). The various Accountable Institutions and financial companies will need to tread carefully – on the one hand they are forced to identify unlawful activity and people or organisations and on the other they are to ensure that they are not to *“deliberately and inappropriately act unfairly against (these same people) as customers”*.

What’s that old saying (suitably adapted)? Treat your friends fairly and your enemies with even more fairness! Really?

## **And the short-term industry?**

As we have reported on in the past few months, there is an investigation underway by the FIC on whether both insurers and FSPs operating exclusively in the short-term market should be upgraded to Accountable Institution status. This would be in the interests of a better all-round approach to anti-money laundering controls, which means that everything referred to above and not just suspicious and unusual transactions as at present would then apply.

The FIC recently undertook a presentation to SAIA on this as part of their consultation process. [Click here](#) to download the Information document and [here](#) for the presentation. If you read these documents, you get the distinct impression that the decision has already been made and AI status is inevitable.



## From the FINANCIAL SECTOR CHARTER COUNCIL

The following have been contacted by the Council by way of a circular dated 5 June 2017:

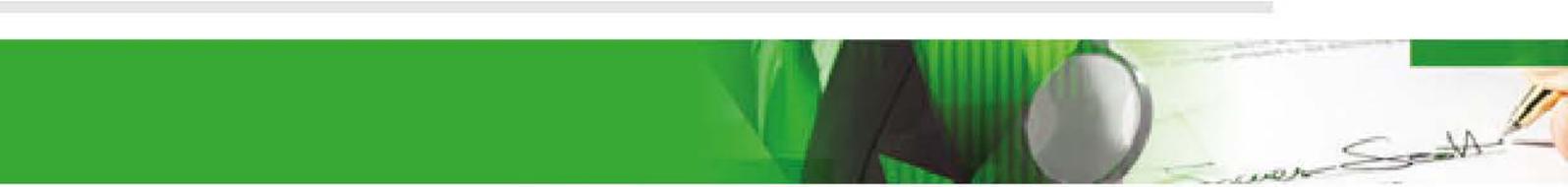
1. Banks
2. International Banks
3. Long-term Assurers
4. Short-term Insurer Schemes
5. Asset Management Companies and Other
6. Reinsurers
7. Insurance Intermediaries
8. Venture Capitalists
9. Underwriting Managers
10. Non-bank Lenders

[Click here](#) to download the circular. The communication requests that all B-BBEE measured entities submit their reports (in terms of the Charter) by 30 June 2017.

This process would have required an initial registration by 9 June 2017 – just three working days after receipt of the e-mail and then submission of the return by the end of the month. [Click here](#) to download the form.

The communication included a registration form and reporting was later confirmed as an online process. We have previously seen such a report format back in 2013 ([click here](#) to see a copy) which is quite detailed.

We have discussed this issue with the FIA to see what their understanding of this process is. Their feedback was aimed at the smaller FSP who would be exempt from formal B-BBEE and was as follows:



*“Our representative on the Charter has confirmed that this is a valid request even for individually owned intermediary businesses although in such cases all that is needed is to formally respond to them with a note to say that this is a sole proprietorship/exempt entity and they will not ask for any further details.*

*They should then confirm the level 4 status accorded to such entities”.*

We also requested clarity from the Council on a number of issues and received the following response:

- 1. Is the need to register and then submit a report an actual legislative requirement? If so under what Act?*
- 2. The Financial Sector Code gazette under Section 9(1) of the Broad-Based Black Economic Empowerment Act, Act No. 53 of 2003, hereby refers. Your attention is drawn to FS 000 Statement 000 paragraph 8.4 in the Financial Sector Code which **requires each entity conducting a business in the South African financial sector to report annually** to the Financial Sector Charter Council on its progress in implementing the provisions of the Financial Sector Code.*
- 3. If an entity falls below the BBEE threshold of R10M turnover is registration and report submission still required. Yes*
- 4. If an entity derives the majority of its income from activities outside the financial sector e.g. motor car dealers or Call centres we assume they would not be required to register and submit returns under this Sector charter but rather under the Charter that best governs their primary activity. Would this be correct? No, we would still require them to register and they will only report on 2 elements of the FS Code which are Access to financial services and Empowerment financing.*
- 5. The period of time allowed for registration was 3 working days and with no prior knowledge that this process has to be undertaken what penalties, if any, will be imposed for failure to register on time and subsequently report on time? No penalties will be imposed, please note that registration is a 2 pager on entity details such as name of entity, registration number, contact details.*

So, it is clear that you will all have to follow the registration and report submission process. Note the deadline is 30 June 2017.



## From the FAIS OMBUD

### **Ruling against Discovery Life**

The Ombud recently ruled on a case involving the sale of life cover through Discovery Life via their call centre operation. FAnews have done a good summary of the case. [Click here.](#)

It should be clear to those involved in direct marketing that ensuring clients are correctly advised and scripts aligned accordingly is vital. Always remember that the script should assume the client knows nothing and will understand even less.

## From FIA

### **The FIA Awards**

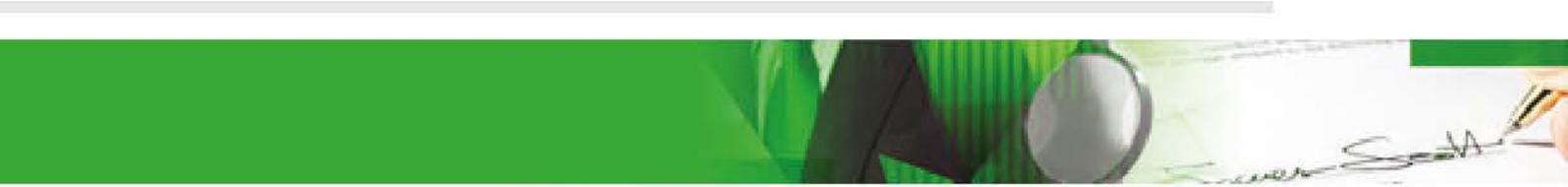
We were pleased to see that one of our clients, Leppard & Associates was voted best Underwriting Manager in this year's awards. Well done to all at Leppard!

For a full article courtesy of Insurance Gateway [click here.](#)

## From SAUMA

A newsletter from SAUMA providing input on their recent conference. [Click here](#) to download a copy. (See if you can spot AC-Proofed's Kim!)

An article from FAnews on the presentation done by Farzana Badat from the FSB at the conference. [Click here.](#)



## From the SHORT-TERM OMBUD

### **Increased limits**

The Ombud has increased the limits for both personal and commercial losses the offices will look at; the first increase since 2011. [Click here](#) to download the press release.

### **2016 annual report**

This was released late in May. [Click here](#) to download the media release and [here](#) for the full report.

A short article on the stats from Insurance Gateway. [Click here](#).

And here for a summary of the report from FAnews. [Click here](#).

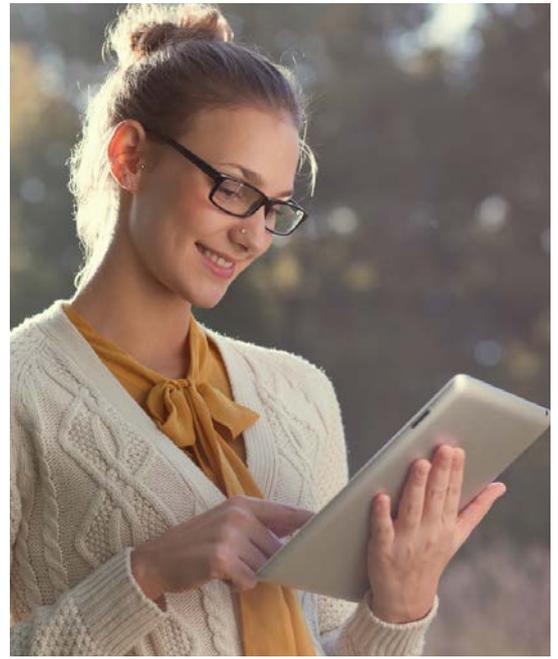


## INTERESTING THINGS WE'VE READ

### Insurance Gateway

We have been informed by the FSB that the new Regulation will be 'Principles based' rather than the current 'rules based'. But do we know what that entails? An article from our own Peter Veal. [Click here.](#)

*Insurance Brokers should review material terms with clients regularly.* An article from Moonstone dealing with two recent FAIS Ombud determinations – vital reading that should cause you to review your own Records of Advice. [Click here.](#)



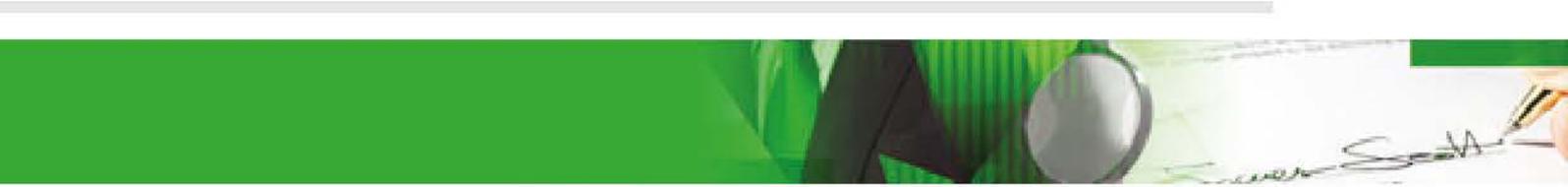
*The FSB Appeal Board.* A good article of how the Appeal Board process works – although we hope you never have to use it! [Click here.](#)

*POPI is here: are you ready?* An article from Justin Keevy of Camargue Underwriting Managers. [Click here.](#)

### FAnews

*D-Day is fast approaching.* An article on the work done by Sanlam, since 2012, to get ready for POPIA. While this is a big organisation, the principle of not waiting until D-Day is a wise one. [Click here.](#)

*Issues of ownership decided by the courts.* An article dealing with the recent Constitutional Court ruling that medical saving accounts funds of members are assets of the medical aid and not the member. [Click here.](#)



*The FAnews Insurance Apprentice.* We enjoy this project and would like to see similar initiatives throughout various sectors of the industry culminating in an overall apprentice winner – maybe even including the compliance industry. The 2018 version is well into its application stage with the application deadline being 31 August 2017. [Click here](#) to see the application form. Our clients with up-and-coming youngsters should consider getting them entered – even if they do not win they will grow immensely.

## **COVER**

*RDR – a perspective from Anton Swanepoel.* An Interview with Anton on his views of RDR and, from his perspective, its timing. [Watch Video.](#)

*RDR in the UK: The winners and losers.* Potential lessons for South Africa.

By Ingé Lamprecht via Moneyweb.

[Click here](#) to download the full article or [click here](#) to view the article online.

And a related article from Felicity Hudson Head of Reputation Management at Discovery.

[Click here](#) to download the article

And an article along a similar theme from FAnews that puts the various aspects to be considered into some perspective – not least of which is the comment in needing some assistance from the compliance industry, although some may think this is a biased opinion. [Click here.](#)



***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.***

***[Click here to download the AC-Proofed brochure](#)***

***Layout and design by Dung Beetle Creative Studio - [www.dungbeetlecs.co.za](http://www.dungbeetlecs.co.za)***