Financial Intelligence Centre

PUBLIC COMPLIANCE COMMUNICATION 60

On the format and manner of completion and submission of the 2026 risk and compliance return as contemplated by Directive 11 of 2026 by specified accountable institutions

12 June 2026

PCC SUMMARY

This Public Compliance Communication provides guidance to the specified accountable institutions, in particular items 1, 2, 3, 9, 11 (excluding banks, mutual banks, and co-operative bank credit providers), 14, 20, 21 and 22 of Schedule 1 of the Financial Intelligence Centre Act, 2001 (Act 38 of 2001) (FIC Act) on the format and manner of completion and submission of the 2026 Risk and Compliance Returns (2026 RCRs) to the Financial Intelligence Centre (Centre) by these specified accountable institutions in order to implement Directive 11 of 2026 (Directive 11), as issued by the Centre.

THE AUTHORITATIVE NATURE OF GUIDANCE

The Financial Intelligence Centre (Centre) provides the guidance contained in this PCC in terms of its statutory function in terms of section 4 (c) of the FIC Act read together with Regulation 28 of the Money Laundering and Terrorist Financing Control Regulations (the Regulations) issued in terms of the FIC Act.

Section 4(c) of the FIC Act empowers the Centre to provide guidance in relation to a number of matters concerning compliance with the obligations in terms of the FIC Act. Guidance provided by the Centre is the only form of guidance formally recognised in terms of the FIC Act and the Regulations issued in terms of the FIC Act. Accordingly, guidance provided by the Centre is authoritative in nature and must be taken into account when interpreting the provisions of the FIC Act or assessing compliance of an accountable or reporting institution with its obligations imposed on it by the FIC Act.

It is important to note that enforcement action may emanate as a result of non-compliance with the FIC Act in areas where there has been non-compliance with the guidance provided by the Centre. Where it is found that an accountable institution has not followed guidance which the Centre has issued, the institution must be able to demonstrate that it has complied with the relevant obligation under the FIC Act in an equivalent manner, nonetheless.

DISCLAIMER

The publication of a PCC concerning any particular issue, as with other forms of guidance which the Centre provides, does not relieve the user of the guidance from the responsibility to exercise their own skill and care in relation to the users' legal position. The Centre accepts no liability for any loss suffered as a result of reliance on this publication.

OBJECTIVE

The objective of this PCC is to provide practical guidance to the specified accountable institutions on how to submit in a timely manner the 2026 risk and compliance return to the Centre, in accordance with **Directive 11, which was gazetted on Tuesday, 31 March 2026.**

1. INTRODUCTION

1.1. PCC 60 provides guidance on the format and manner of completion and the manner and process of submission of the 2026 risk and compliance return (RCR) to the Centre by the specified accountable institutions in order to implement Directive 11.

1.2. Directive 11 mandates the specified accountable institutions as designated in Schedule 1 of the Financial Intelligence Centre Act, 2001 (Act 38 of 2001) (FIC Act), to complete the 2026 RCR questionnaire relevant to their operations, based on their understanding of money laundering, terrorist financing, and proliferation financing (ML, TF and PF) risks, as well as their implementation of current risk-based controls, in accordance with the requirements of the FIC Act.

2. GENERAL TERMS AND APPLICATION

2.1. Directive 11 applies to all **specified accountable institutions** referred to in items 1, 2, 3, 9, 11 (excluding banks, mutual banks, and co-operative bank credit providers),14, 20, 21, and 22 of Schedule 1 of the FIC Act.

2.2. A separate 2026 RCR must be submitted to the Centre by each specified accountable institution, and each 2026 RCR submission should reflect the specified accountable institution's unique organisation identity (Org ID) number.

2.3. The requirement to submit a 2026 RCR to the Centre applies to all specified accountable institutions, whether they have branch office networks or no branches. The branches of such accountable institutions do not have to submit a separate RCR.

2.4. The specified accountable institutions must take into account the activities of all its branches and consolidate the information into the single RCR 2026 response it submits to the Centre. This means that the activities of the head office and all other branch offices of a specified accountable institution, will be included in the single 2026 RCR that must be submitted for each designated FIC Act Schedule item category it falls within.

2.5. Accordingly, the specified accountable institution is only required to submit a single consolidated 2026 RCR, covering the business activity of its head office and all branch offices, as a commercial entity on an enterprise-wide basis.

The exception: A branch office is structured as a separate legal entity

2.6. The guidance in paragraph 2.5 above does not apply in circumstances where a branch office or certain branch offices of an accountable institution, are structured as a separate partnership or incorporated legal person or juristic person in their own right, separate from, even though associated to, the specified accountable institution. Such separate partnership, incorporated legal person or juristic partnership, constitutes a unique accountable institution, which should be registered separately with the Centre, and have its own unique Org ID, as an accountable institution.

2.7. The consequence is that such partnership, legal person or juristic person, as a separate accountable institution, should have registered separately as an accountable institution in its own right, due to its legal structure, under a particular business activity as designated in an item under Schedule 1. Such specified accountable institution will also be required to submit a single 2026 RCR to the Centre in respect of all the branch offices falling within its legal structure, as a specified accountable institution for each designated FIC Act Schedule item category it falls within.

2.8. In summation, where several branch offices are structured is a separate juristic entity, from its associate accountable institution, that structure constitutes a separate accountable institution in its own right, which must register as an accountable institution and submit a 2026 RCR to the Centre.

A franchise network of accountable institutions

2.9. A franchise network of accountable institutions, which are separate legal entities from each other, is not a branch office network, and are all required to register separately as accountable institutions with the Centre on the goAML platform and must each submit separate 2026 RCRs under their designated item in Schedule 1 to the Centre.

> **Example – Accountable institutions operating under common name and brand where one institution is an accountable institution in its own right**
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> Estate Agent A permits Estate Agent B to operate under a franchise arrangement as a business entity under Estate Agent A's name and brand.
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> Estate Agent B is a separate juristic entity and therefore operates as an accountable institution in its own right for its own account.
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> In this scenario both Estate Agent A and Estate Agent B must register separately as accountable institutions with the Centre on the goAML platform and must submit separate 2026 RCRs under their designated item in Schedule 1 to the Centre.

More than one 2026 RCR may be due by a specified accountable institution

2.10. Importantly, the Centre reminds all specified accountable institutions that where they conduct business activities across more than one FIC Act Schedule 1 item, they must submit a separate 2026 RCR to the Centre, for each business activity that specified accountable institution conducts as separate designated items of FIC Act Schedule 1.

Example – The legal practitioner that conducts business across more than one FIC Act Schedule 1 item

The legal practitioner which provides general legal services, which must then register with the Centre as an item 1 designated entity as a legal practitioner under Schedule 1 of the FIC Act (Schedule 1). This is normally its primary registration with the Centre.

The designation of items in Schedule 1 is based on business activity vulnerable to money laundering abuse, and therefore a functional activity approach is enshrined in Schedule 1. An accountable institution that conducts the functional business activity within a designated item must register with the Centre in respect of that business activity.

Accordingly, where the legal practitioner performs legal services in relation to such designated business activity under Schedule 1, that legal practitioner must in addition then register separately with the Centre under that designated item, such as when the legal practitioner provides trust services and company services to their clients. In that scenario, the legal practitioners must register with the Centre as under:

- Item 2 of Schedule 1, as the provider of trust services, as contemplated in Schedule 1 (the second registration); and
- Item 2 of Schedule 1, as the provider of company services as contemplated in Schedule 1 (the third registration).

This means that potentially, this legal practitioner should have three separate and unique registration profiles on the goAML registration and reporting platform of the Centre, which will result in the legal practitioner possessing three distinct and unique goAML Org ID numbers with the Centre.

The consequence is that such legal practitioner for each of the three separate accountable institution registrations it holds, must submit to the Centre three separate 2026 RCRs, one for each of the three designated item profiles under Schedule 1.

2.11. Directive 11 does not apply to a bank, mutual bank, and a co-operative bank that carries on business of a credit provider as contemplated in item 11 of Schedule 1 of the FIC Act.

Manner of preparation

2.12. Specified accountable institutions falling under items 1, 2, 3, and 9 of Schedule 1 to the FIC Act, must submit the completed questionnaire in the 2026 RCR in a manner that complies with the RCR data information period which covers three separate years from 1 April 2023 to 31 March 2026, both dates inclusive.

2.13. The specified accountable institution is required to gather, collate and complete the requested RCR data information as stated in paragraph 2.6, in order to submit in the same 2026 RCR form under three separate and distinct periods, as follows:

2.13.1. 1 April 2023 to 31 March 2024 (year 1)

2.13.2. 1 April 2024 to 31 March 2025 (year 2)

2.13.3. 1 April 2025 to 31 March 2026 (year 3).

Importantly, only after the accountable institution has completed the 2026 RCR with the required RCR data information separately for each of these three years, may the accountable institution, submit the 2026 RCR to the Centre.

Example – Registered with the FIC or commenced business
Where an accountable institution only registers with the Centre, within the last year (year three), however has commenced business during year 1 and year 2, then the accountable institution must submit the return for all three years (year 1, 2 and 3) with the Centre.
The accountable institution must submit a return for each year for which its business is opened. (refer to Regulation 27A of the Money Laundering and

Terrorist Financing Control regulations). The accountable institution must submit a return for each year it is required to be registered as an accountable institution. Where an accountable institution only registers in year three and only opens its business in year three, then the accountable institution only has to submit the return for year three (year 3). Accountable institutions are cautioned against falsely omitting to complete the return for all the applicable years of registration with the FIC. Similarly, accountable institutions are cautioned against falsely omitting to complete a return for all the applicable years for which its business is opened. Information submitted during the RCR submission process may be subject to inspection.

2.14. Specified accountable institutions falling under items 11 (excluding banks, mutual banks, and co-operative bank credit providers), 14, 20, 21 and 22 of Schedule 1 to the FIC Act, must submit the completed questionnaire in the 2026 RCR in a manner that complies with the RCR data information period which covers three separate years from 1 July 2023 to 31 March 2026, both dates inclusive.

2.15. The specified accountable institution is required to gather, collate and complete the requested RCR data information as stated in paragraph 2.8, in order to submit in the same 2026 RCR form under three separate and distinct periods, as follows:

2.15.1. 1 July 2023 to 31 March 2024 (period 1)

2.15.2. 1 April 2024 to 31 March 2025 (period 2)

2.15.3. 1 April 2025 to 31 March 2026 (period 3).

Importantly, only after the accountable institution has completed the 2026 RCR with the required RCR data information separately for each of these three periods, may the accountable institution, submit the 2026 RCR to the Centre. Refer to example above which deals with registration and commenced business.

3. ADHERENCE TO THE SCHEDULE GOVERNING THE 2026 RCR SUBMISSION

3.1. The commencement date of Directive 11 was Wednesday, 1 April 2026.

3.2. Specified accountable institutions may access the website of the Centre to download a sample template of the questionnaire contained in the 2026 RCR.

3.3. Accountable institutions must access the 2026 RCR submission platform in order to submit their RCRs.

3.4. It is critical to enable an adequate, correct and timely adherence to the requirements of Directive 11 and the adequate, timely and correct completion and submission of the 2026 RCRs. The specified accountable institutions must also strictly adhere to the Schedule annexed to this PCC.

3.5. The annexed Schedule below conveys the specified Schedule 1 designated items required to submit the 2026 RCR, the applicable RCR data information periods, and the RCR submission commencement and due dates.

4. METHOD FOR SUBMITTING 2026 RISK AND COMPLIANCE RETURNS

4.1. The Centre's website hosts an access link to the online 2026 RCR submission platform.

4.2. Only those specified accountable institutions that have successfully registered with the Centre on the FIC registration and reporting platform, and who have received an Org ID number may submit an online 2026 RCR to the Centre.

4.3. The Org ID number is a prerequisite for the submission of the 2026 RCR and must be first obtained from the Centre by registering with the Centre on goAML or updating the existing registration information of that entity and its users, on goAML.

4.4. Specified accountable institutions will not be able to submit the 2026 RCR online if they are not registered with the Centre and do not have an Org ID number. The Centre strongly urges all unregistered specified accountable institutions to immediately register without delay to obtain an Org ID number on the goAML platform.

4.5. Specified accountable institutions are urged to immediately access the website of the Centre using this link to download a sample template of the questionnaire contained in the 2026 RCR. The downloaded sample template should be studied to understand the questions posed, and the type of RCR data information the specified accountable institution should gather and collate for each specified RCR data information year or period, as applicable to it.

4.6. The downloaded sample template should enable an orderly preparation of the requested RCR data information sets. It is recommended that the entity complete in draft the RCR data information at hand, against each question for each RCR information year or period, to ease the time taken for the online completion of the 2026 RCR form.

4.7. The Centre recommends that only once the specified accountable institution has all the required RCR data information captured on the downloaded sample template or at hand, should the specified accountable institution proceed to transpose and complete the 2026 RCR form moving from the first year or period, to the second and then the third year or period.

4.8. Once the specified accountable institution has collated and has readily available or at hand the required RCR data information, that accountable institutions must access the online 2026 RCR form, through the Centre's online RCR submission platform.

4.9. The specified accountable institution should then proceed to complete in the online 2026 RCR all the questions for each year or period contained in the questionnaire of the 2026 RCRs, and only once each year or period is completed in the 2026 RCR, should the completed 2026 RCR be submitted to the Centre.

4.10. The compliance officer assisted by the compliance function of an accountable institution must submit the 2026 RCR. However, the board of directors, senior manager or person with the highest authority in the accountable institutions remain responsible for ensuring compliance with the obligation to complete and submit the 2026 RCR. Third-party service providers are not allowed to submit the 2026 RCR on behalf of the accountable institution.

4.11. Upon logging onto the 2026 RCR platform, users will be prompted to enter their same goAML registration and reporting platform credentials to access the RCR system. Importantly, the sharing of user credentials is prohibited in terms of Directive 2 of 2014.

4.12. The specified accountable institutions must submit a separate 2026 RCR for each Org ID number held by that accountable institution, in respect of each designated item under which that accountable institution falls under (which should give rise to a unique Org ID number for each designated item category) in Schedule 1 of the FIC Act.

4.13. Only one RCR submission is permitted by the specified accountable institution for each Org ID number held, irrespective of the number of branches or subsidiaries that specified accountable institution may register with or intend to register with the Centre.

4.14. Accountable institutions must accurately capture and state their Org ID number in the RCR. In the Org ID field, only the FIC-generated Org ID number is to be captured, and not a personal ID number nor the company registration number.

4.15. It is important to note that, while completing the online questionnaire of the 2026 RCR, the completed data may be saved several times and at any stage prior to the final submission of the 2026 RCR. This is a crucial step which the Centre urges the specified accountable institutions to apply as this enables users to log in and complete the questionnaire of the 2026 RCR, in several online sessions if they are not able to complete the questionnaire of the 2026 RCR, in one session.

4.16. Upon successful submission of the completed 2026 RCR to the Centre, the goAML system will display the completed questionnaire of the 2026 RCR as submitted.

4.17. It remains the specified accountable institution's obligation to ensure the 2026 RCR data information submission is adequate, accurate and complete, before submission on the goAML system, as changes to the submitted 2026 RCR cannot be made after submission.

4.18. The specified accountable institution will be able to download a copy of their completed 2026 RCR after submission, for record-keeping purposes.

4.19. It is important to note that once submitted, the 2026 RCRs may not be retracted, or withdrawn on goAML. Where an accountable institution finds that its 2026 RCR submission is inaccurate, it must submit a written compliance query to the Centre, advising that it has submitted an incorrect 2026 RCR.

4.20. Specified accountable institutions must ensure that they review all answers provided to the questions for adequacy, accuracy or correctness, and correct the errors, before they finally submit the 2026 RCR to the Centre.

4.21. Non-compliance with Directive 11 in all respects may result in administrative sanctions being applied by the Centre on the specified accountable institution.

5. COMMUNICATION WITH THE CENTRE

5.1. The Centre has a dedicated compliance contact centre geared to assist accountable institutions to understand their registration obligations in terms of the FIC Act. Please call the compliance contact centre number on **(012) 641 6000 and select option 1**.

5.2. Compliance Queries may also be submitted online by visiting the Centre's website and clicking on: https://www.fic.gov.za/compliance-queries/.

Issued By:
The Director
Financial Intelligence Centre
12 June 2026

SCHEDULE

(IN RESPECT OF DIRECTIVE 11 OF 2026)

Schedule 1 designated items	RCR data information periods	RCR commencement dates and due dates
Item 11 (excluding bank, mutual bank, and co-operative bank credit providers)	Saturday, 1 July 2023 to Tuesday, 31 March 2026, both dates inclusive.	RCR submission commences on 4 May 2026 and is due on 30 June 2026, no later than 17:00
Items 14, 21, and item 22 (crypto asset service providers)	Saturday, 1 July 2023 to Tuesday, 31 March 2026, both dates inclusive.	RCR submission commences on 4 May 2026 and is due on 30 June 2026, no later than 17:00
Item 2 and item 9 (casinos)	Saturday, 1 April 2023 to Tuesday, 31 March 2026, both dates inclusive.	RCR submission commences on 4 May 2026 and is due on 30 June 2026, no later than 17:00
Items 20 (high-value good dealers, including dealers in precious stones and dealer in precious metals and including Krugerrand dealers)	Saturday, 1 July 2023 to Tuesday, 31 March 2026, both dates inclusive.	RCR submission commences on 4 May 2026 and is due on 31 July 2026 no later than 17:00
Items 1, 3 and 9 (non-casinos)	Saturday, 1 April 2023 to Tuesday, 31 March 2026, both dates inclusive.	RCR submission commences on 4 May 2026 and is due on 31 July 2026 no later than 17:00