

**DRAFT DIRECTIVE IN TERMS OF SECTION 43A(3)
OF THE FINANCIAL INTELLIGENCE CENTRE ACT, 2001 (ACT 38 OF 2001)**

1. Title

Draft Directive 11 of 2026 on the submission of risk and compliance returns to the Financial Intelligence Centre (Centre) by accountable institutions specified in this Directive.

2 Purpose

2.1 This Directive is issued by the Centre in terms of section 43A(3)(a) of the Financial Intelligence Centre Act, 2001 (Act 38 of 2001) (FIC Act).

2.2 The Directive requires the accountable institutions specified in paragraph 4 of this Directive to submit their [risk and compliance return questionnaire](#) to the Centre.

3. Definitions

In this Directive the ‘Act’ means the Financial Intelligence Centre Act, 2001 (Act 38 of 2001) and includes any regulation or directive made under the Act, and, unless the context otherwise indicates, any word or expression to which a meaning has been assigned in the Act has that meaning, and:

(a) “Risk and compliance return” includes, but is not limited to, the risk and compliance return questionnaires issued by the Centre, which may be subject to change from time to time.

(b) “Risk and compliance return platform” means the electronic system designated for the receipt of risk and compliance return questionnaires by the Centre.

4. Application

4.1. Subject to paragraph 4.2, this Directive applies to every accountable institution referred to in items 1, 2, 3, 9, 11 (excluding bank, mutual bank and co-operative bank credit providers), 14, 20, 21 and 22 of Schedule 1 of the Act.

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

5. Directive

5.1 Every accountable institution specified in this Directive must submit the completed risk and compliance return to the Centre in accordance with the Schedule to this Directive.

5.2 Accountable institutions must answer all questions in the risk and compliance return questionnaire applicable based on their understanding of money laundering, terrorist financing and proliferation financing risks and its implementation of current risk-based controls in compliance with the obligations set out in the Act.

5.3 The risk and compliance return covers the specific information reporting periods and must be submitted to the Centre by the due dates, as specified in the Schedule below, as follows:

5.3.1 Accountable institutions falling under items 1, 2, 3, and 9 of Schedule 1 to the FIC Act, must submit the completed questionnaire for the information period of 1 April 2023 to 31 March 2026, both dates inclusive.

5.3.2 Accountable institutions falling under items 11 (excluding bank, mutual bank and co-operative bank credit providers), 14, 20, 21 and 22 of Schedule 1 to the FIC Act, must submit the completed questionnaire for the information period of 1 July 2023 to 31 March 2026, both dates inclusive.

5.4 The risk and compliance return is an automated return. Specified accountable institutions are required to populate the information directly via the link on the risk and compliance return platform as made available by the Centre.

SCHEDULE

Schedule 1 items	Information period	RCR due date
Item 11 (excluding bank, mutual bank, and co-operative bank credit providers)	Saturday, 1 July 2023 to Tuesday, 31 March 2026, both dates inclusive.	On 30 April 2026, no later than 17:00
Items 14, 21, and item 22 (CASPs)	Saturday, 1 July 2023 to Tuesday, 31 March 2026, both dates inclusive.	On 30 April 2026, no later than 17:00
Item 2 and item 9 (casinos)	Saturday, 1 April 2023 to Tuesday, 31 March 2026, both dates inclusive.	On 30 April 2026, no later than 17:00
Items 20 (HVGDs, including DPS and DPM (including Krugerrand dealers))	Saturday, 1 July 2023 to Tuesday, 31 March 2026, both dates inclusive.	On 30 May 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.	On 30 May 2026 no later than 17:00

6. Failure to comply with the Directive

An accountable institution that fails to comply with the provisions of this Directive is non-compliant and is subject to an administrative sanction in accordance with section 62E of the Act.

7. Commencement

This Directive takes effect on the date of publication by the Centre.

**PIETER SMIT
ACTING DIRECTOR
FINANCIAL INTELLIGENCE CENTRE
11 March 2026**