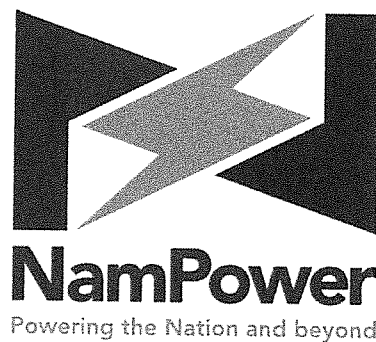


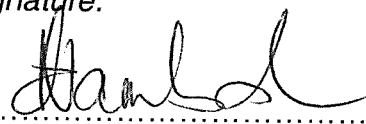
# **NAMPOWER**

# **POLITICALLY EXPOSED PERSON POLICY**

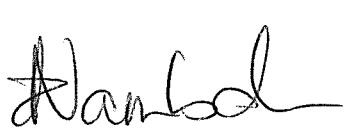



<b>Business Unit:</b>	Office of the Managing Director
<b>Section:</b>	Chief Legal, Compliance & Company Secretariat
<b>Document Name:</b>	Politically Exposed Persons Policy_v3_17/06/2021
<b>File Reference:</b>	2/P/1/1

**RESPONSIBLE PERSON:**

<b>Date of NamPower Board Resolution:</b>	
<b>Date of NamPower Executive Committee Resolution:</b>	
<b>Responsible Person (Name in Full):</b> Yvette Z. Nambahu (Mrs)	<b>Signature:</b> 
<b>Date Signed:</b> 18/10/2021	..... Chief Legal, Compliance & Company Secretariat

**SIGN OFF:**

<b>Authorised by (Name in Full):</b> Yvette Z. Nambahu (Mrs)	<b>Approved by Managing Director (Name in Full):</b> Kahenge S. Haulofu (Mr)
 ..... <b>Signature: Chief Legal, Compliance &amp; Company Secretariat</b>	 ..... <b>Signature: Managing Director</b>
<b>Date:</b> 18/10/2021	<b>Date:</b> 18/10/21
<b>Review Date:</b>	<b>Version:</b> 1.0 Revision Document  12 February 2024

<i>Every 3 years from date of signature or as and when required</i>	
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## 1. OBJECTIVE

The objective of the NamPower Politically Exposed Persons (“the Policy”) is to provide guidance and regulation on the acceptance, management and monitoring of Service Providers and customers that are prominent and/or politically influential persons in Namibia. Furthermore, the Policy provides guidance on the recruitment of prospective employees who might be PEP. The policy is based on best practices internationally and aims to bring NamPower’s compliance in line with those best practices. The Policy should be read in conjunction with Corruption Act, 2003 (Act No. 8 of 2003), the Public Procurement Act, 2015 (Act No. 15 of 2015), the Financial Intelligence Act, 2012 and any other applicable legislations, NamPower internal Policies and Procedures on procurement and recruitment.

## 2. SCOPE OF THE POLICY

This Policy is applicable to all domestic politically exposed persons, NamPower employees which includes those on contract, Service Providers and customers that may have an interest in rendering any sort of legal service to NamPower.

## 3. REFERENCE DOCUMENTS

- Anti-Corruption Act, 2003 (Act No. 8 of 2003)
- The Public Procurement Act, 2015 (Act No. 15 of 2015)
- FATF Recommendations
- Financial Intelligence Act, 2012 (Act No. 13 of 2012)
- The Namibian Constitution, 1990 (Act No. 1 of 1990)

## 4. ABBREVIATIONS

PEPs	Political Exposed Person Policy
EDD	Enhanced Due Diligence
SPDD	Service Provider Due Diligence which includes consultants, contractors, suppliers e.g.,
FIC	Financial Intelligence Centre
FATF	Financial Action Task Force
KYSP	Know Your Service Provider

## 5. DEFINITIONS

- 5.1 **"Accounting Officer"** means the Managing Director of NamPower. For purposes of this policy, Managing Director and Accounting Officer may be used interchangeably.
- 5.2 **"Bid"** means an offer or proposal submitted in response to a request to supply goods, works or services, or any combination thereof, and, where applicable, include any pre-qualification process;
- 5.3 **"Business Unit (BU)"** means a department or functional unit within NamPower.
- 5.4 **"Close Associates"** Close Associates are individuals who are closely connected to a PEP, either socially or professionally. The category of closely associated persons should include close business associates/partners (especially those that share beneficial ownership of legal entities with the PEP or who are otherwise connected e.g., through joint membership of a company board). It's also personal/ financial advisors/consultants or persons acting in a fiduciary capacity to the politically exposed person as well as any other person(s) who benefit significantly as a result of being close with such a person.
- 5.5 **"Close Family"** Close Family members are defined as individuals who are related to the PEP either directly (consanguinity) or through civil or customary marriage in terms of article 66 of the Namibian Constitution.

The following examples serve as aids in defining and identifying close family members:

- (a) Spouses and life partners;
- (b) Children and siblings;
- (c) Parents and grandparents;
- (d) Uncles and aunts;
- (e) Nephews and nieces; and
- (f) Relatives by customary or civil marriage.

5.6 **"Customer"**

Means a person that contracts directly with a NamPower for the provision of services and may include a generator, distributor, large power user, transmission customer or end-use customer.

a PEP is defined as an individual who is or has in the past been entrusted with prominent public functions in a particular country.

5.7 **"Politically Exposed Persons"**

a PEP is defined as an individual who is or has in the past been entrusted with prominent public functions in a particular country.

The following examples serve as aids in defining PEP's. The examples apply to individuals that may have previously held the said position.

- Heads of State and their deputies
- Governors;
- Heads of Government agencies and cabinet Ministers;
- Members of National Council;
- Senior Civil Servants (National/ Regional/ Provincial Government);
- Local Authorities Officials e.g., Mayors and Councillors;
- Senior Embassy and Consul staff;
- Members of Houses of Traditional Authorities (Kings, Queens and Chiefs);
- Senior members of the army and/ or influential officials, functionaries and military leaders and people with similar functions international or supernatural organizations;
- Senior members of the Police Services;
- Senior members of the National Intelligence Services;
- Senior members of the Judiciary (Judges, Magistrates and Prosecutors);
- Senior and/or influential representatives of religious organisations;
- Political Leaders;

- Labour Group Officials;
- Influential functionaries in the private sector and public services administration;
- Key leaders of State owned Enterprises;
- Private companies, trusts, foundations, or other juristic persons owned or co-owned by PEP's, whether directly or indirectly; and
- Any business/ and or joint venture that has been formed by, or for the benefit of a senior political figure.

- 5.8 **"Key leaders of State-owned Enterprises"** This is a team of individuals who exercise general control over and management of the activities of the whole or significant portion of the business, regularly participate to a material degree in the control over and general management of the business and activities of the organisation. They are responsible for ensuring that they map out values of the organisation, build the organisation's vision and set direction on the future of the organisation. These individuals include, but are not limited to, the Head/ the CEO, Chief Financial Officer, Directors, Board members, Chairman/ Chairperson etc.
- 5.9 **"Procurement Committee"** means a Committee comprising of 5 members established in accordance with Section 25(1) and Regulation 6 of the Public Procurement Act and appointed by the Managing Director.
- 5.10 **"Procurement Management Unit"** means the Section responsible for the execution of procurement functions within NamPower.
- 5.11 **"Service Provider"** means the consultants, contractors, suppliers, prospective employees. For purposes of this policy, Service Providers and clients may be used interchangeably.
- 5.12 **"Supplier"** means a person delivering goods, works, consultancy services or other services;
- 5.13 **"Works"** means any work associated with the construction, reconstruction, demolition, repair or renovation, site



preparation, excavation, erection, building, installation of equipment or materials, decoration and finishing, as well as services incidental to construction such as drilling, mapping, satellite photography, seismic investigations and similar services.

## **6. POLICY STATEMENT**

- 6.1 PEP's are high risk as they hold positions of power and influence that may be abused for private gain or to benefit family members or close associates. Family members and close associates may also be abused to conceal funds or assets that were gained corruptly.
- 6.2 Due to these inherent risks, it is imperative that the NamPower takes steps to identify whether a Service Provider, prospective Service Provider and/or a Customer is a PEP. A EDD and enhanced monitoring processes shall be applied. By setting up these processes NamPower will ensure that it is able to appropriately manage any legal and reputational risks that may arise from entering such business relationships with PEP. It will also ensure compliance with various national and international guidelines and directives issued by the FIC which are aimed at combating money laundering and the prevention and detection of fraud and other corrupt practices including financing of terrorist activities.

## **7. POLICY**

- 7.1 NamPower is not precluded from forming a business relationship with a PEP therefore the identification of a PEP does not on its own create an automatic reason to decline or reject a bid, connect a customer or refuse employment. However, when a PEP is identified an EDD should be conducted prior to a decision on whether to establish a business relationship or not.
- 7.2 According to the FATF recommendations, refusing a business relationship with a PEP based on the identification of a person as a PEP, is contrary to the letter and spirit of the recommendations. Furthermore, the FIC guidance notes on the management of PEP's are intended to assist any institution which is recognised under the Financial Intelligence Act, 2012 to develop appropriate controls to verify PEP's before establishing a business relationship with them.

## **8. OBJECTIVE IDENTIFICATION OF A PEP AND RISK CLIENTS**

- 8.1 NamPower identifies PEP's by:
  - 8.1.1 Screening application forms of service providers, customers and prospective employees against identified PEP lists;
  - 8.1.2 Establishing the identity of the service provider, customers and prospective employees;
  - 8.1.3 In the case of legal persons identifying the beneficial owners;
  - 8.1.4 Following a two-tier process consisting of ascertaining or collecting of certain identification documents and verification of these documents against reliable information.
- 8.2 Risk profiling a Service Provider or prospective employee as a PEP utilising the identity, occupation and industry of the Service Provider, customer or prospective employee;
- 8.3 Considering other reputable sources of information such as industry publications, government publications or press releases and/or company issued updates etc.

## **9. ENTITIES IN WHICH PEPS HAVE BENEFICIAL INTEREST**

- 9.1 If a PEP is an associated party to an entity and holds more than 25% voting rights in the entity, the entity itself will be regarded as high risk due to the association with a PEP. The PEP designation stems from the beneficial owner or shareholder, it is not driven by the entity itself.
- 9.2 An entity should also be considered as high risk if it a PEP has significant influence over the policy, business and strategy. To determine if a PEP exercises significant influence over the policy, business and strategy of an entity, regard needs to be had to the nature of the position held by the individual concerned i.e., day to day management position versus an individual in an isolated consultative role or a non-executive role.

## **10. KNOW YOUR SERVICE PROVIDERS REQUIREMENTS (“KYSP”)**

### **10.1 IDENTIFICATION PROCESS**

- 10.1.1 Establishing the identity of the service provider, customers and prospective employees through the request of identification documents in NamPower application forms and/or bidding documents;

- 10.1.2 Screening suppliers, contractors and consultants against identified PEP lists. In the case of legal persons identifying the beneficial owners;
- 10.1.3 In the case of legal persons identifying the legal form, address, directors, partners or senior management and establishing whether there is authority to bind the legal person;
- 10.1.4 Following a two-tier process consisting of ascertaining or collecting of certain identification documents and verification of these documents against reliable information
- 10.1.5 Human Resource is required to obtain correct information from the employee as per the applicable KYSP checklists. These checklists are contained in NamPower's internal policies, and they can also be obtained from the Compliance Officer.

## **10.2 PRE-APPROVAL - SERVICE PROVIDER/CUSTOMER DUE DILIGENCE ("SPDD")**

- 10.2.1 SPDD is the key and primary source of information used for the purposes of determining whether a Service Provider or a Customer is a PEP or not.
- 10.2.2 SPDD must be conducted when:
  - (a) establishing a new business relationship with a service provider or the prospective employee.
  - (b) there is a valid reason to doubt the authenticity of information or documentation, or data or other information previously obtained for the purpose of KYSP in question.
- 10.2.3 Employees dealing with prospective employees, customers or service provider are required to bring all the information concerning a potential transaction or business relationship to the Compliance Officer for screening in order to verify and to ensure that the Service Providers, Customer or employees are not listed on any sanctions lists, or to determine whether they or their family members, service providers or relatives or close associates or beneficial owners are PEPs.
- 10.2.4 When conducting SPDD on PEP's, beneficial owners may be uncovered and will be verified accordingly by the Compliance Officer.
- 10.2.5 In respect of bids, SPDD should be conducted by the PMU upon review of the bids at the date of opening before a bid is submitted to the Procurement Committee if it is a bid for recommendation to the MD and in the event of recruitment, the Human Resource Executive for EXCO approval, by following the process as stipulated in ANNEXURE A: PRE- APPROVAL DISCOVERY PROCESS. The process will however not suspend the procurement process

due to the stringent timelines for evaluation and award as set out in the Public Procurement Act.

- 10.2.6 Where there is a positive identification of a PEP, the Compliance Officer will complete the required form as provided in ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS and will ensure that an EDD is conducted.
- 10.2.7 Once an EDD has been conducted, the Compliance Officer will complete the ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS Form advising the relevant committees of the information discovered.
- 10.2.8 It must be noted that despite the need to ensure that an EDD is conducted on PEPs to ensure compliance with the FATF recommendations and other various guidelines, and directives issued, in the application and implementation of this policy, caution must be exercised to ensure that the basic right of all Service Provider, Customer and prospective employees to privacy are not infringed.

### **10.3 POST APPROVAL DISCOVERY - SPDD**

- 10.3.1 If any employee uncovers that a Service Provider, Customer, or prospective employee is a PEP through contract monitoring, applications for employment or network connection, the respective employee is required to inform the Compliance Office formally using the forms provided in ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS.
- 10.3.2 If there are any changes in the shareholding structure of a Service Provider, the new identification documents of the beneficial owners must be sent to the Compliance Officer in order to conduct SPDD and an EDD if necessary and the PEP register must be updated accordingly.
- 10.3.3 When a PEP has been established by the Compliance Office, which would normally occur during the pre-approval stage or through a quarterly screening of existing Service Provider 's database and sometimes on a case- by- case basis as deemed necessary, the PEP register will be updated accordingly.
- 10.3.4 Once an EDD has been conducted, the Compliance Office will complete a Politically Exposed Person's Reporting Form ("ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS form") advising the Procurement Committees, the relevant Business Unit or the Human Resource Executive about the information discovered regarding the identified PEP. A process flow diagram detailing the

processes outline above is included as ANNEXURE D: POLITICALLY EXPOSED PERSON DUE DILIGENCE AND MONITORING WORKFLOW.

## **11. PROCUREMENT MATTERS**

- 11.1 In line with NamPower's Procurement Policy, the procurement officer must ensure that shortlisted prospective Service Providers or service providers are screened accordingly.
- 11.2 When PEPs are identified at the bid opening or bid evaluation stage, the Procurement Management Unit is required to forward the details of PEP's to the Compliance Officer in order to conduct an EDD.
- 11.3 Once an EDD has been conducted, the Compliance Office will complete a Politically Exposed Person's Reporting Form ("ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS" Form") to be attached as part of submission to the Procurement Committee, advising the Committee about the information that was discovered (if any) concerning the PEP.
- 11.4 A process flow diagram detailing the processes outline above is included as ANNEXURE E: POLITICALLY EXPOSED PERSON PROCUREMENT AND RECRUITMENT SCREENING WORKFLOW.

## **12. SCREENING OF EMPLOYEES PART OF THE HUMAN RESOURCES PROCESS**

### **12.1 IDENTIFICATION OF A PEP**

- 12.1.1 PEP verification will be incorporated into the Human Resource's process and all new employees will be screened as confirmation of their PEP status.
- 12.1.2 If an employee's PEP status changes they are required to notify both Human Capital and the Compliance Office of such a change in their PEP status.

### **12.2 APPROVAL PROCESS FOR EMPLOYEES**

- 12.2.1 For the appointment of the non-executive employees with a PEP status, the Executive Human Capital will recommend the appointment of such a PEP to the Managing Director and the Managing Director will exercise his discretion taking into account good labour practices.
- 12.2.2 In the case of a senior position, such as the appointment of an Executive or a position with a direct reporting line to the Managing Director, a recommendation must be made to Board for approval.

- 12.2.3 A process flow diagram detailing the processes outline above is included as ANNEXURE E: POLITICALLY EXPOSED PERSON PROCUREMENT AND RECRUITMENT SCREENING WORKFLOW.

### 13. MONITORING AND REPORTING

- 13.1 Once the NamPower has established a business relationship with a PEP, the Compliance Office is required to conduct on-going monitoring on the PEPs and advise the business on any changes that may be identified.
- 13.2 Ongoing monitoring of PEP Service Provider, Customer or prospective employee is required to be conducted:
- 13.2.1 Every twelve (12) months (i.e., periodic review) as part of the compliance monitoring process; or
- 13.2.2 As a result of a trigger event (whichever is the sooner).
- 13.3 Periodic reviews must be completed for all Service Providers, Customers and prospective employees, identified as a PEP or those Service Providers, Customers or prospective employees with an indirect relationship through their association with a PEP. A trigger event could include, but is not limited to;
- 13.3.1 A change in the PEP's role;
- 13.3.2 A change in the PEP's residency;
- 13.3.3 A new application involving the same PEP;
- 13.3.4 Adverse media report;
- 13.3.5 The receipt of a court order/subpoena etc. against the Service Provider or the prospective employee.
- 13.4 The following information and documentation must be reviewed/ reconfirmed/ updated when conducting a periodic review of a PEP Service Provider or prospective employees:
- 13.4.1 All KYSP information;
- 13.4.2 The relevance of the EDD conducted initially;
- 13.4.3 Where adverse information such as ongoing litigation or regulatory proceedings were noted as part of the on-boarding information, further checks must be undertaken to ascertain any outcomes or obtain updated information.
- 13.5 Any amendments or deviations to this policy, together with the reasons for deviation will be announced on the Stock Exchange News Services (SENS) of

the Johannesburg Stock Exchange (JSE) and the PEP register and the relationship with NamPower will be made available on NamPower's website and the NamPower Annual Financial Statements.

#### **14. TREATMENT OF PEPS**

- 14.1 In making the decision to approve or not approve a bid or employment application, where a PEP is involved, the approving committee shall take into consideration the material information discovered at the application stage or during the monitoring stage in terms of clause 14 regarding the identified PEP due process has to be followed in accordance with Annexure E.
- 14.2 In the event where it is found through the EDD or ongoing monitoring that the PEP is high risk for money laundering, financing of terrorism or proliferation (as defined in the Financial Intelligence Act), the following steps must be taken:
  - 14.2.1 approval must be obtained by the NamPower Board of Directors to commence or continue a relationship with such person.
  - 14.2.2 Inform the Financial Intelligence Centre (the "Centre") and take measures as prescribed by the Centre.

#### **15. TRAINING AND AWARENESS**

- 15.1 The Compliance Office in consultation with the Education Training and Development Section will ensure that there is ongoing training of employees and awareness will be created around this policy to ensure that employees have a better understating of PEP's, the risks associated with PEPs and how NamPower is dealing with PEPs.

## **ANNEXURE A: PRE- APPROVAL DISCOVERY PROCESS**

The following is a step-by-step illustration of the process to be followed when a PEP has been identified in the SPDD process prior to approval of the transaction,

### **STEP 1**

- 1.1 When a PEP, family member, or associate has been discovered/ identified during the SPDD stage, responsible employee must send the information to Compliance Office using the ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS form. The responsible employee must then as part of its submission complete ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS and attach it to the report to the procurement committee or the Executive Human Resource advising all the relevant known information regarding the identified PEP.
- 1.2 The Compliance Officer in consultation with the Risk Officer should perform a risk assessment of the PEP's business relationship. The risk assessment should be a composite assessment of all the risk factors to determine if the business relationship with the PEP is of higher risk.
- 1.3 The following should be considered when conducting an assessment:
  - 1.3.1 Service Provider or prospective employee risk factors;
  - 1.3.2 Kind of facility; and
  - 1.3.3 Nature of the prominent public function that the PEP has such as the PEP's level of involvement on the transaction (is he/ she the decision maker), access to or control over public funds, history / profile of the PEP (any adverse media reports, regulatory issues or criminal record of the PEP concerned) and the nature of the position held?
- 1.4 If the risk assessment establishes that the business relationship with the PEP presents a low risk, the Compliance Office will classify it accordingly and a less stringent EDD will be conducted.
- 1.5 If the risk assessment suggests that the business relationship with the PEP will be of high risk, Compliance Office will have to ensure continuous monitoring of that account.
- 1.6 EDD will comprise of the following:
  - 1.6.1 Seeking more information from the PEP for purposes of identifying and verifying whether there are any other beneficial owners in the transaction;
  - 1.6.2 Understanding the ownership and control structure of a legal person, trust or similar arrangement where there is a PEP involvement;
  - 1.6.3 When conducting an EDD, Compliance Office should consider such factors, as whether the PEP;



- (a) has business interests which are related to his/ her public functions (conflict of interest);
- (b) whether the PEP holds several (related and unrelated) prominent public functions which may enable influence to be exerted at several key decision-making points in a process.

1.7 Once an EDD has been concluded, Compliance Office will have to complete ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS" from advising the relevant committee(s) about the information discovered regarding the identified PEP.

## **STEP 2**

2.1 Pursuant to FATF recommendations and the Financial Intelligence Act, 2012, relevant institutions are required to obtain senior management approval for establishing or continuing an existing business relationship with PEPs.

2.1.1 The approving committee will review the information at hand and decide based on all information presented to it, including any other additional information that may be presented verbally or confirmed by any member of the committee.

2.1.2 Furthermore, the committee that will recommend for approval a business relationship with a PEP, when assessing a PEP, should take into consideration the PEP's risk profile before they can approve that transaction.

## **STEP 3**

3.1 If the transaction is approved by the relevant Committees, the business unit concerned will continue with the transaction as per relevant internal processes.

3.2 If the transaction is rejected by the relevant Committees, the business unit concerned will then follow relevant processes for all rejected applications.

## ANNEXURE B: DEFINITION OF PEPS

1. "Politically Exposed Person "PEP" - definitions of Politically Exposed Persons are wide-ranging. According to the Financial Intelligence Centre (FIC) Directive No. 02 of 2020, a PEP is the term used for an individual who is or has in the past been entrusted with prominent public functions in a particular country. Due to their position and influence, it is recognised that many PEPs are in positions that potentially can be abused for the purpose of committing Money Laundering (ML) offences and related predicate offences, including corruption and bribery, as well as conducting activities related to Terrorist Financing (TF) and Proliferation Financing (PF).
2. The following examples serve as aids in defining PEPs:
  - (a) Heads of State and their deputies
  - (b) Heads and Deputies of Regional Government (Premier);
  - (c) Heads of Government agencies and cabinet Ministers;
  - (d) Regional/Provincial Government Ministers;
  - (e) Members of National Parliament;
  - (f) Members of Provincial Legislature;
  - (g) Senior Civil Servants (National/Regional/Provincial Government);
  - (h) Local Government officials (City Mayors, Councillors and Municipal Managers);
  - (i) Senior Embassy and Consul Staff;
  - (j) Members of Houses of Traditional Leadership (Kings and Chiefs);
  - (k) Senior members of the army and/ or influential officials, functionaries and military leaders and people with similar functions international or supernatural organizations;
  - (l) Senior members of the Police Services;
  - (m) Senior members of the Secret Services;
  - (n) Senior members of the Judiciary (Judges, Magistrates and Prosecutors);
  - (o) Senior and/ or influential representatives of religious organisations;
  - (p) Political Leaders;
  - (q) Labour Group Officials;
  - (r) Influential functionaries in the private sector and public services administration;
  - (s) Key leaders of State owned Enterprises;
  - (t) Private companies, trusts, foundations, or other juristic persons owned or co-owned by PEP's, whether directly or indirectly; and
  - (u) Any business/ and or joint venture that has been formed by, or for the benefit of a senior political figure.

**ANNEXURE C: POLITICALLY EXPOSED PERSON (PEPS) REPORTING FORM IDENTIFICATION PARTICULARS**

**POLITICALLY EXPOSED PERSON (PEPs) REPORTING FORM IDENTIFICATION PARTICULARS**



**PRIMARY PARTICULARS**

First Names:	
Surname:	
Middle Name:	ID/Passport Number:

**COUNTRY DETAILS**

Country of Origin:	Citizenship:
Current Country of Residence:	

**CURRENT STATUS AND BACKGROUND**

Current Occupation:		
Occupational Title:		
Status:	<input type="checkbox"/> Active	<input type="checkbox"/> None-Active
Is the Service Provider ( <i>tick whichever is applicable</i> ):		
<input type="checkbox"/> A PEP	<input type="checkbox"/> Closely related to a PEP	<input type="checkbox"/> Closely Associated to a PEP

**KNOWN BUSINESS INTERESTS**

No.	Name of Entity	Role of Entity	Shareholding %	Status	
				Active	None-Active

## POLITICALLY EXPOSED PERSON (PEP) REPORTING FORM



### MEDIA REPORTS/ OTHER SOURCES OF INFORMATION

*(Please reference all known adverse media reports associated with the PEP)*


### REPORTING PERSON/S

Full Names:

Designation:

Business Unit:

Section:

Business Unit Head:

Head of Business Unit Signature: .....

Date: .....

Reporting Person's Signature: .....

Date: .....

### COMPLIANCE VERIFICATION REPORT

*(Compliance to verify all known adverse media reports/ information associated with the PEP)*


### COMPLIANCE PARTICULARS

(Compliance Officer) Full Names:

Business Unit Head:

Head of Business Unit Signature: .....

Date: .....

Reporting Person's Signature: .....

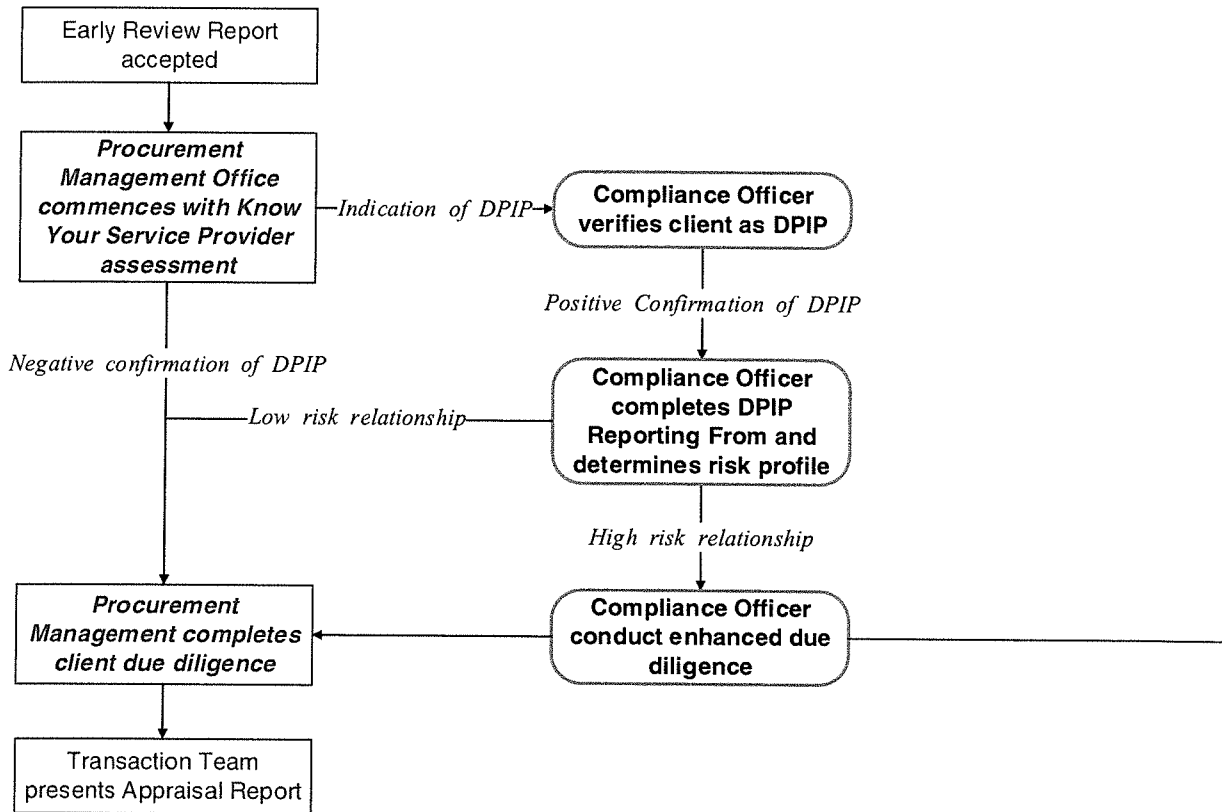
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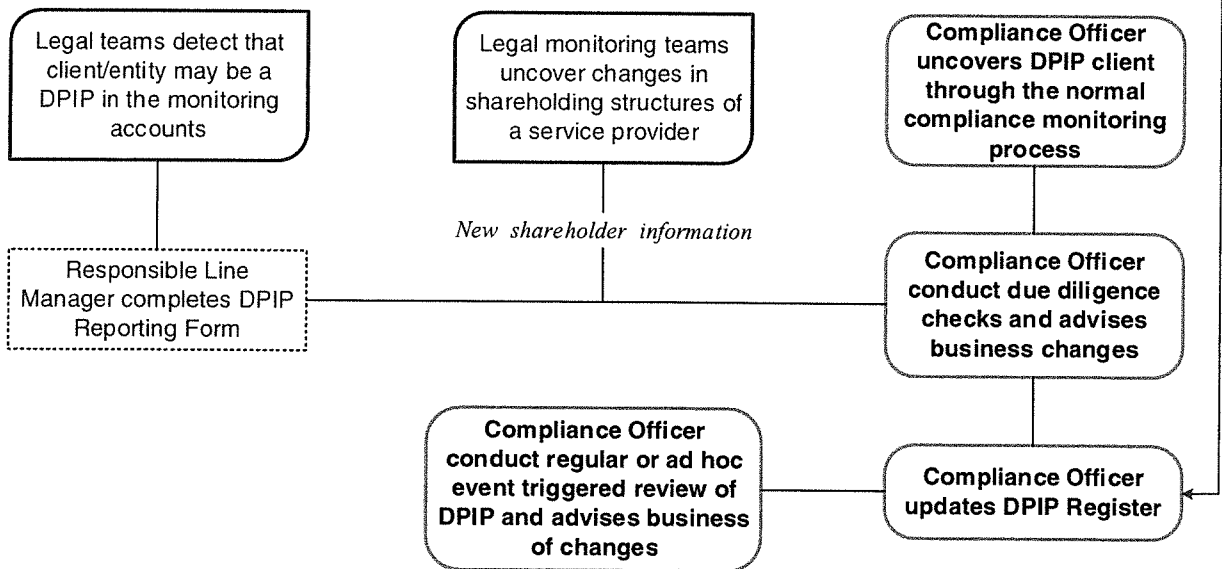
**POLITICALLY EXPOSED PERSONS – REGISTER**

Item #	Date	Full Names	Country	PEP	Status		Shareholding %	Decision	
					Active	Inactive		Approved	Not Approved

**ANNEXURE D: POLITICALLY EXPOSED PERSON DUE DILIGENCE AND MONITORING WORKFLOW**



**DPIP POST – APPROVAL MONITORING WORKFLOW**



## ANNEXURE E: POLITICALLY EXPOSED PERSON PROCUREMENT AND RECRUITMENT SCREENING WORKFLOW

