

Directive 12

What accountable institutions need to know



Financial
Intelligence Centre

The Financial Intelligence Centre (FIC) issued Directive 12, which requires specified accountable institutions to submit their risk management and compliance programmes (RMCPs) annually through the goAML registration and reporting platform, within prescribed submission periods.



Directive 12 is applicable to the following accountable institutions:

Schedule 1 items	Accountable institution category
Item 1	Legal practitioners (including attorneys, conveyancers, notaries, advocates practising with a trust account, commercial legal practices)
Item 2	Trust and company service providers
Item 3	Estate agents
Item 9	Gambling institutions
Item 11	Credit providers, excluding banks, mutual banks, and co-operative bank credit providers
Item 14	The South African Post Bank
Item 20	Dealers in high-value goods where any transaction is equal to or more than R100 000 per item, whether the payment in any form, is made in a single or in multiple operations that appear to be linked
Item 21	The South African Mint Company
Item 22	Crypto asset service providers

1. What is Directive 12 about?

Starting from 7 September 2026, specified accountable institutions are required to submit RMCPs to the Financial Intelligence Centre (FIC) through the [goAML](#) registration and reporting platform.

With the issuing of Directive 12, the submission of RMCPs is now an annual requirement. Accountable institutions must also submit updated RMCP documentation within 90 days of any material changes, while new businesses must submit within 90 days of commencing business.

2. Which accountable institutions must submit annual RMCPs?

Directive 12 applies to accountable institutions listed in items 1, 2, 3, 9, 11, 14, 20, 21 and 22 of Schedule 1 to the FIC Act. Credit providers that form part of banks, mutual banks or co-operative banks groups are excluded from the application of Directive 12.

Sub-branch operations: If a subsidiary has its own branches outside South Africa, details for each of these foreign branches must also be provided.

Note: Where an accountable institution has branches which are not accountable institutions in **their own right**, only one RMCP submission is required. Branches that are standalone accountable institutions **must submit their own RMCPs**.

3. Directive 12 requires RMCP submissions within set timelines

Accountable institutions specified by the directive must submit to the FIC a copy of the documentation describing their RMCP. Submissions open on **7 September 2026** and are due by specific deadlines.

	Schedule 1 accountable institutions	2026 deadline	Annual deadline thereafter
	Items 1, 2, 9 and 11 (excluding banks, mutual banks and co-operative bank credit providers)	9 October 2026	9 October annually
	Items 3, 14, 20, 21 and 22	31 October 2026	31 October annually

Important: Late submission, failure to submit, or failure to update an RMCP within the required period will be deemed as non-compliance with the FIC Act and may result in an administrative sanction, which may include a financial sanction.

4. Non-compliance may lead to sanctions

Specified accountable institutions must also submit updated RMCP documentation within **90 days** of any changes approved in terms of section 42(2B). New businesses that fall within the Directive 12 categories must submit RMCPs within **90 days** of commencing business.

5. How to submit an RMCP

RMCPs can only be submitted on the FIC registration and reporting platform, goAML. Follow these steps to submit your RMCP:

Step 1

Save the approved RMCP in PDF format as **YYYYMMDD_RMCP.pdf**, using the approval date by the board, senior management or highest authority. Example: **20250304_RMCP.pdf**

Step 2

Log on to goAML, click on your profile at the top right and select "My Org Details"

Step 3

In the comments section below the organisation's address, add "RMCP submission" to activate "Submit Request"

Step 4

Under "Attachment", click "Upload", select the saved RMCP PDF and click "Open"

Step 5

Click "Submit Request" and then "Continue" to submit the RMCP to the FIC

6. What is an RMCP?

An RMCP is a written document which sets out how an accountable institution identifies, manages and mitigates money laundering, terrorist and proliferation financing risks through policies, processes, systems and controls. An RMCP is a legal requirement that helps accountable institutions manage financial crime risks and protect the financial system. For more information on how to develop, maintain and implement an RMCP, read **PCC 53**.

Need help?

Call +27 12 641 6000 or submit an online compliance query

Submit or update your RMCP today.

Visit www.fic.gov.za for more information.

