To include as currently listed in Companies Act plus people who are convicted for an offence involving money laundering, corporate fraud, and tax fraud.

NPO Act currently no list of minimum requirements for being on a board! (Do they or Master have systems to enforce as required?)

Registration for all as NPOs does not assist and undermines the risk-focused approach: so much irrelevant data will make it harder to find useful information

## Attack on freedom of association

Independence of civil society underminedgovernment permission required to 'operate' in SA

Banks will police up to date disclosure and freeze accounts if non-compliant

Trusts declare named beneficiaries, founders and trustees to the Master

## AML CTF

NPCs and Trusts double whammy of registration,

NPO and systems breaks down under the admin burden

Scaring off/ donor flight for foreign organisations.

## CIPC annual returns to include disclosure of

 beneficial ownersOrganisations with members which themselves have members must list and name the actual people at the very bottom (or top) of structures

Public annual listings and disclosure of the people who ultimately control the decisions, policies and board appointments in NPCs, PTY's, trusts, and 'Public' Voluntary Associations.

Decrease in voluntary wider accountability negative impact on non-profit governance

## Consequences of Bill not being passed and South Africa failing to avoid grey-listing

All foreign funding, donations and investments slowed dramatically if not stopped entirely.


