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?)

Concept of 'Beneficial

ownership' defined

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

Expanded list of sorts of persons who cannot serve on boards (Reported by courts and enforced by CIPC, Master and NPO directorate).

NPO registration becomes compulsory for 'public purpose' NPCs, Trusts and VA's who 'operate' in South Africa (including foreign organisations)

NPCs and Trusts double

NPO and systems breaks down under the admin burden

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

whammy of registration, reports and disclosure under the Trust/ Companies Act plus NPO Act Scaring off/ donor flight for foreign organisations.

CIPC annual returns to include disclosure of

beneficial owners

Organisations 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.

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.

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