

As a result of South Africa (**SA**) being added to the UK High-Risk Third Countries list with effect from 27/06/2023, Credo – along with other market counterparties in the UK – will be required to apply enhanced due diligence (**EDD**) on all accounts where the investor (or its beneficial owner, where applicable), or the investor's source of funds (**SoF**) or source of wealth (**SoW**) is from SA.

Besides the standard customer due diligence, Credo will also be required to obtain the account purpose, evidence of the SoF and SoW. Every SA account will also have to be approved by one of Credo's senior managers and as a result the SLA to open SA accounts will increase to 10 business days.

Kindly note that for wrapper and "asset swap" accounts we do not need to conduct EDD on the underlying clients who have invested via these means as the wrapper/asset swap provider (the Provider) will be the legal and beneficial owner of the assets. In this instance and for existing Provider clients, we will only need the EDD of the Provider and where we don't already hold this, we will request this as part of a separate remediation project.

Moreover, the regulatory change means that Credo will also be required to conduct a remediation exercise on existing accounts. We will contact you in due course to discuss what is required in practice and the best way to go about the remediation.

Where there is an additional investment into an existing account, we will require evidence of SoF and SoW.