C R Trustees

Significant Improvements:
Guidance Note 7A vs Guidance Note 7

Guidance Note 7A modernizes compliance — moving from a **prescriptive checklist** to a **flexible, risk-based, governance-driven framework** aligned with FATF and UN standards.

CRT RISK

FIC Guidance Note 7A
1 September 2025

9 October 2025

CR Trustees

Maturity shift from **Guidance Note 7 (red/amber)** to **Guidance Note 7A (green)**

Area	Guidance Note 7 (Earlier)	Guidance Note 7A (2025)	Maturity Cue
Risk-Based Approach	Prescriptive, limited flexibility	Expanded definitions, inherent vs residual risk, risk matrices	🔴 → 🟢
Risk Assessment	Broad categories only	Detailed indicators, national/sectoral risks, FATF typologies	🟠 → 🟢
Risk Mitigation	Mainly CDD focus	Full suite of tools, EDD vs SDD, discourages de-risking	🟠 → 🟢
Customer Due Diligence (CDD)	Rigid ID/verification steps	Flexible, risk-based, broader scope (legal persons, trusts, PIPs)	🔴 → 🟢
Record-Keeping	General obligation	Clear standards on format, retention, audit trails	🟠 → 🟢
RMCP	Required but not structured	Comprehensive, board-approved, governance-driven	🔴 → 🟢
UN Sanctions & PF	Limited reference	Dedicated chapter, screening, freezing, PF risks	🔴 → 🟢

- **Colour coding:**
  - 🔴 = Prescriptive / underdeveloped
  - 🟠 = Partial / limited guidance
  - 🟢 = Mature, risk-based, governance-aligned

GN7A represents a **full maturity shift** — from **tick-box compliance** to a **strategic, risk-based, internationally aligned framework**.

✅ **In summary:**

GN 7A shifts from a **rules-based, prescriptive model** (GN 7) to a **flexible, risk-based, institution-specific framework**.

It strengthens governance, embeds board accountability, integrates international standards, and balances AML/CFT/CPF with **financial inclusion**.

Jan de Beer 0827761850 jan@crtrustees.co.za

THANK YOU

CR Trustees

CRT RISK