N A T I O N A L   O F F I C E
851 River View Park Street, Riverview Office Park
Halfway Gardens
Midrand 1685
Reception-010 0018500

LEGAL PRACTICE COUNCIL

Advisory Notice **Ref: AN/FIC/15052026**

15 May 2026

Submission of the 2026 Risk and Compliance Return ("RCR") in terms of Directive 11 of 2026

The Legal Practice Council (**"LPC"**) issues this Advisory Notice to ensure that all legal practitioners who qualify as accountable institutions under the Financial Intelligence Centre Act, 2001 (**"FIC Act"**) are fully informed of their mandatory obligation to submit a 2026 Risk and Compliance Return (**"RCR"**) pursuant to Directive 11 of 2026 issued by the Financial Intelligence Centre (**"FIC"**).

Directive 11 of 2026 requires specified accountable institutions to electronically submit a 2026 Risk and Compliance Return ("RCR") to the Financial Intelligence Centre through the goAML platform. The RCR is intended to assess an institution's understanding of money laundering (ML), terrorist financing (TF) and proliferation financing risks (PF), as well as the adequacy and implementation of its risk-based compliance controls.

1. Scope of Application

This Advisory Notice applies to all legal practitioners who qualify as accountable institutions under Item 1 of Schedule 1 to the FIC Act, specifically:

- Attorneys (including conveyancers and notaries) practising for their own account as contemplated in Section 34(5)(a) of the Legal Practice Act, 28 of 2014 ("LPA");
- Advocates practising with a fidelity fund certificate as contemplated in section 34(2)(a)(ii) of the LPA;
- Commercial juristic entities practising in terms of section 34(7) of the LPA.

2. Reporting Period

The 2026 RCR covers a **three-year reporting period** from **1 April 2023 to 31 March 2026 (both dates inclusive)**.

3. Submission Period and Deadline

Submission window opened: 4 May 2026;
Final submission deadline: 31 July 2026 before 17:00

Practitioners are strongly advised not to delay submission until the closing date. The RCR questionnaire is comprehensive and requires the collation of detailed information across three reporting years. Early preparation is essential.

4. Submission Platform and Technical requirements

All RCRs must be submitted exclusively via the FIC's online goAML platform. The following requirements apply:

- Manual, paper-based, or email submissions will not be accepted under any circumstances.
- The submitting practitioner or entity must be registered on the goAML platform and must hold a valid FIC Organisation Identity Number (Org ID) prior to submission.
- The RCR must be submitted under the correct Org ID. Incorrect Org IDs will render submissions invalid.
- Only one RCR submission is permitted per Org ID. Entities with branch networks, or those registered under more than one Schedule 1 item, must submit a separate RCR for each Org ID held.
- Practitioners who are not yet registered on the goAML platform must register immediately, as the registration process takes time and must be completed before submission can occur.

5. Responsibility for Accurate Submission

- The RCR must accurately reflect the institution's risk assessment and compliance environment.
- Only one submission per Organisation ID is permitted.
- Submitted RCRs cannot be withdrawn or amended after submission.

7. Consequences of Non-Compliance

Failure to submit the RCR within the prescribed period constitutes non-compliance with Directive 11 and the FIC Act and may result in administrative sanctions and other regulatory action.

8. Practice Steps for Compliance

Practitioners are advised to take the following steps without delay:

- Confirm your registration status on the goAML platform and ensure your Org ID is active and correct.
- Review the sample RCR composite questionnaire (see resources below) to understand the scope and depth of information required.
- Review Draft PCC 125 of 2026, which provides detailed practical guidance on the completion and electronic submission of the RCR.
- Ensure that your RMCP is current, implemented, and properly documented — the RCR will require detailed information about your risk management framework.
- Collate all relevant compliance records, client due diligence files, and transactional information covering the three-year reporting period (1 April 2023 – 31 March 2026).
- Designate a responsible person within your practice to coordinate and oversee the RCR submission process.
- Do not wait until the final days of the submission window.

9. Relevant FIC Resources and Reference Materials

The following official FIC resources are available to assist practitioners in fulfilling this obligation:

- Directive 11 of 2026 (full text): https://www.fic.gov.za/wp-content/uploads/2026/03/Directive-11-%E2%80%93-Risk-and-compliance-return.pdf
- FIC Web Notice – Directive 11 of 2026: https://www.fic.gov.za/2026/03/31/web-notice-directive-11-rcr/
- Draft PCC 125 of 2026 – Guidance on completion and submission of the 2026 RCR: https://www.fic.gov.za/wp-content/uploads/2026/03/2026.3-PCC-PCC-125_On-RCR-Submission-in-terms-of-Directive-11_Issue.pdf
- 2026 RCR Composite Questionnaire Sample: https://www.fic.gov.za/wp-content/uploads/2026/03/Risk-and-compliance-return-2026-Composite-questionnaire-sample.pdf
- FIC Risk and Compliance Return Information Page: 2026 Risk and compliance return – FIC

Issued by the Legal Practice Council