corruption watch

ADDRESSING ILLICIT FINANCIAL FLOWS

A civil society research analysis of illicit financial flows, enablers, case studies, legal duties, and reform priorities in South Africa

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Introduction

Illicit financial flows (IFFs) pose a significant threat to the development and growth of the global economy. They weaken economic growth and undermine the integrity of systems. In particular, they create vulnerabilities in the promotion of accountability and transparency while creating opportunities for weakened government processes, fuelling potential loss and damage to the global reputation. According to the report of the High-Level Panel on Illicit Financial Flows[1], Africa is estimated to be losing more than US$50-billion annually in IFFs as the illicit activity tends to be complex and hidden within legal transactions, creating a gap in the balancing of protection of rights and compliance with regulatory obligations.

In South Africa, the National Development Plan (NDP) Vision 2030 identifies IFFs and capital flight as major leakages of domestic wealth. It emphasizes that plugging these resource outflows is critical to retaining the capital needed to achieve its core 2030 goals of eliminating poverty, reducing inequality, and addressing unemployment. According to Sekese (2025), IFFs directly undermine economic growth, costing the South African economy the equivalent of almost 5% of the tax revenue is collected annually.

During the G20 Multi-Stakeholder Dialogue on Illicit Financial Flows (IFFs), Domestic Resource Mobilisation (DRM) and Financing for Development (FFD), hosted by SGN Grant Thornton in partnership with the Institute for Global Dialogue (IGD) in May 2025, the deputy minister of International Relations and Cooperation, Mr Alvin Botes, alluded that in 2022 South Africa received roughly US$1.1 billion in official development assistance but continues to lose an estimated US$3.5 to US$5 billion each year to tax abuse, trade mis-invoicing, illegal capital transfers and profit-shifting which ultimately erode tax bases, shrink fiscal space, weaken institutions and make true sovereignty impossible. He further indicated how Africa still receives tens of billions in development aid, yet it is estimated to lose more through illicit financial flows.

Addressing the root causes of IFFs is critical in enhancing and strengthening sustainable development, thus closing loopholes for potential vulnerabilities and risks. Additionally, addressing the illicit flow of money remains a key component in improving the effectiveness of reforms, enhancing compliance and ensuring the fair application of the rule of law. Corruption is one of the activities that may generate illicit financial flows. As an anti-corruption non-profit civil society organisation advocating for transparency, accountability, and fairness, Corruption Watch embarked on desktop research aimed at combating the risks associated with the illicit flow of money.

The purpose of the report

The purpose of this report is to:

- Identify the enablers of illicit financial flows.
- Strengthen monitoring, detection, and reporting of illicit financial flows.
- Enhance awareness and strengthen financial transparency.

[1] https://au.int/en/documents/20210708/report-high-level-panel-illicit-financial-flows-africa

Contextualising illicit financial flows

The report of the High-Level Panel on Illicit Financial Flows defines IFFs as the "money that is illegally earned, transferred, or utilized. These funds typically originate from the following sources: commercial tax evasion, trade mis-invoicing, and abusive transfer pricing; criminal activities, including the drug trade, human trafficking, illegal arms dealing, and smuggling of contraband; and bribery and theft by corrupt government officials"[2].

According to Netshisaulu and Van der Poll (5:2022), IFFs can be categorised from different perspectives, which includes motives, impacts, sources, actors involved and channels. Gumede and Fadiran (2019) posits that these may be categorised into commercial, criminal and corruption activities. For example, in the extractive sector like the petroleum and mining industries, IFFs come in manners of illegal resource exploration, tax evasion via transfer pricing and smuggling and corruption (Osman & Salifu, 4:2022). At times, the transfer mispricing comes in the form of manipulation of prices with the intention of shifting profit from host countries, usually with high taxes, to the low-tax economies (Osman & Salifu, 4:2022).

In his paper, Reuter (2017) argues that major sources of illicit financial flows which amongst others includes bribery; corporate profit shifting and currency regulation evasion, involving channels for the movement of the monies, e.g., bulk cash smuggling; criminal enterprise earnings; informal value transfer systems; tax evasion; trade-based money laundering; and the use of shell corporations. Osman and Salifu (5:2022) argue that criminal activities among parties are often a significant source of illegal financial flow which are mostly executed through trades in medicines, terrorist funding, human trafficking, drug trading, racketeering, counterfeiting, contraband etc.

What becomes clear is that there are various definitions of and approaches to measuring IFFs. The inherently secret nature of IFFs also hampers the ability to measure the outflows and ascertain their impact. Regardless of the technical difficulties, the impact of IFFs is felt by those who would benefit most from the State's additional capacity to implement development initiatives.

Drivers of IFFs

When it comes to understanding the actual drivers of IFFs there are various actors involved, according to Musseli and Bonanomi (2020:1). They argue that there are corporate groups or physical persons, public officials or private persons, there are different push and pull drivers motivating the prevalence of IFFS. On the same note there is a believe that IFFs can be understood from source to recipient country through transit countries through which illicit funds flow, ranging from simple smuggling to trade based money (Musselli & Bonanomi, 2020:1). In most cases, criminal networks use structures to evade taxes and launder money by moving funds into offshore tax havens. This can be a form of shell or shelf company, and international banks.

State capture and corruption

In an article published by Corruption Watch in 2025[3], it is argued that corruption-related IFFs can originate with corrupt elites with the emphasis that Africa has been party to this with a host of dictators, political elites, and warlords shifting their illicit funds across the globe. For example, in a South African case of the Gupta family, the excess funds were moved out of the country[4] under the leadership of the former

[2] Page 9
[3] https://www.corruptionwatch.org.za/where-do-illicit-financial-flows-out-of-africa-go-ti-follows-the-dirty-money/
[4] https://www.corruptionwatch.org.za/wp-content/uploads/2018/11/Zondo-commission-%E2%80%93-Transnet-port-contract-benefitted-Guptas.pdf

president Jacob Zuma. The looted funds are spirited away using a global banking network, often passing through secrecy jurisdictions and tax havens with the help of international financial and advisory firms.

Another interesting IFFs case was in 2023 when amaBhungane Centre for Investigative Journalism released an article about the prominent Moti Group following a major investigative leak referred to as the MotiFiles[5]. The article shared insights of various reports concerning the VBS Mutual Bank collapse which took place in 2018 following a massive fraud and corruption scandal known as "The Great Bank Heist". The bank was subsequently placed into final liquidation in November 2018, with over R2 billion looted from depositors, municipalities, and burial societies. According to the insights shared by amaBhungane, between late 2016 and up to the collapse of VBS Mutual Bank in March 2018 a colossal hawala scheme seemingly operated through three VBS accounts, receiving and rapidly paying out roughly R1.3-billion to a wide array of South African companies and individuals. It was alleged that bank records and documents from the MotiFiles were showing how suspicious accounts at the gutted VBS Mutual Bank were used on a massive scale by Zimbabweans to illicitly shift money and transact in South Africa (amaBhungane, 2023).

Hiding proceeds of crime

Criminals mix illegally obtained wealth within the legitimate global financial network, making its tracking nearly impossible. The UNODC supports the statement by describing a standard three stage laundering process as follows:

- **Placement:** Criminals distance the funds from the initial crime by buying high value assets or smuggling cash physically across borders.
- **Layering:** Laundering networks move funds globally through rapid, complex financial transactions to break the audit trail.
- **Integration:** The money is made available to the criminal from what seems to be legitimate sources. It eventually appears as legitimate commercial revenue or investment capital (UNODC).

[5] https://amabhungane.org/category/stories/motifiles/

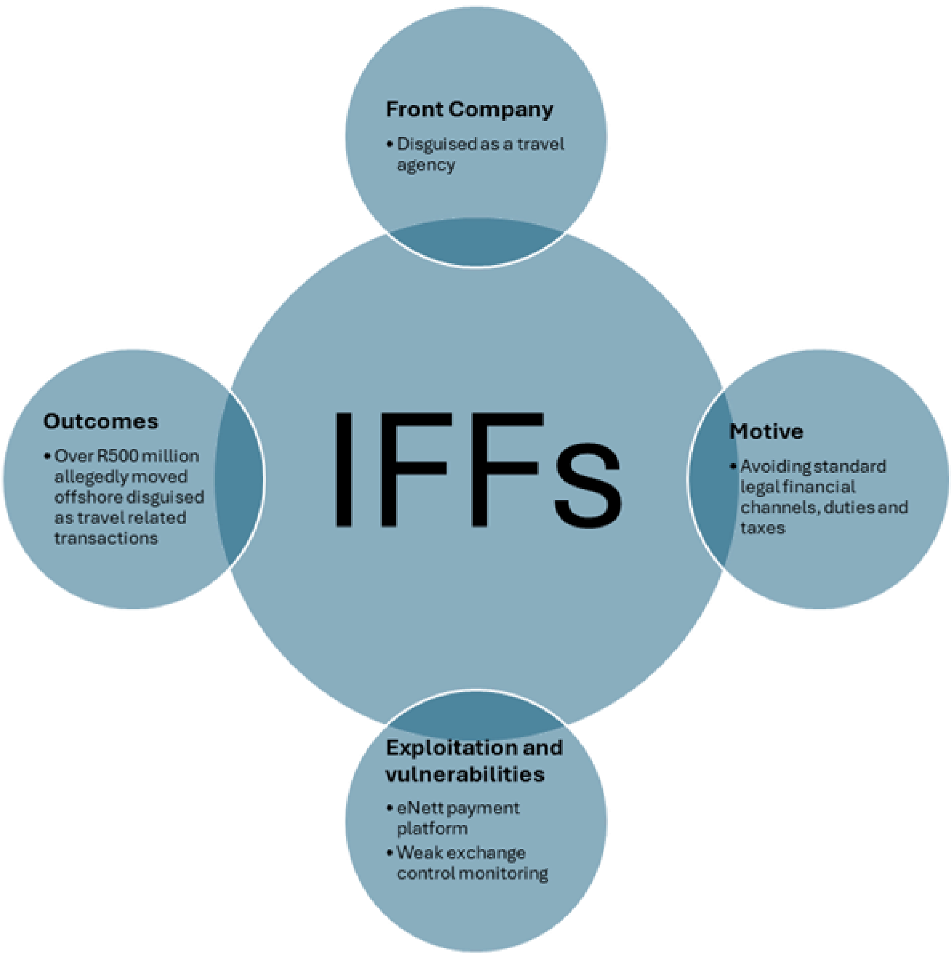
HOW DOES THE MONEY FLOW? A CASE STUDY

This case study presents the alleged use of a travel agency structure and virtual payment mechanisms to facilitate illicit cross-border financial flows out of South Africa. With the Fourth Industrial Revolution accelerating the adoption of digital payment platforms, virtual cards, automated booking systems, and non-bank payment channels, these technologies improve efficiency and convenience. However, they also create new vulnerabilities for financial crime when controls do not adequately verify the commercial purpose, beneficiary, and supporting documentation behind transactions. In March 2026, a case involving the illicit financial flows of over R500 million was presented before the Palm Ridge Magistrate's Court in Katlehong, South Africa.

The alleged modus operandi

Ms Zhang Ying Potgieter, a director of a travel agency company known as Blue Planet Travel Services allegedly siphoned over R500 million out of South Africa using her company as a front. This was reportedly conducted using the eNett payment platform which enabled generating virtual account numbers (VANS) to make fictitious travel bookings for over 150 clients, who allegedly wanted to move money abroad without using legal channels. The alleged scheme involved presenting payments as legitimate travel-related transactions and in this context, clients deposited large sums into accounts linked to Blue Planet Travel Services which were later moved off-shore successfully disguised as travel bookings.

The core risk in this arrangement was the mismatch between the stated purpose of the payment and the underlying reality where booking, passenger, ticketing, invoice, and merchant data do not align. Travel payment flows were used to obscure the true origin, purpose, and destination of funds.



The accused's movable and immovable assets

Despite siphoning millions offshore, our sources reveal that Ms Potgieter only has two (2) vehicles registered under her name and two (2) properties purchased in 2001 and 2006 respectively.

Key control weaknesses

- Loopholes in cross-border flows are weak points in the system that criminals target for exploitation. In this context, there was a weak detection of repeated or unusual payment patterns across related accounts.
- There was insufficient verification of whether travel-related payments corresponded with genuine travel activity.
- Transactions were structured to appear technically compliant to delay identification of red flags.

Lessons learned

This case highlights how legitimate commercial channels can be misused to disguise unauthorised capital movements, avoid regulatory scrutiny, and undermine exchange control compliance. The case further highlights the importance of coordinated oversight between financial institutions, payment platforms, authorised dealers, regulators, and law enforcement agencies. The importance of verifying cross-border transactions above the reporting threshold or where such cumulative transactions are above the threshold, especially where the destination of funds is not a traditional bank account or has more favourable tax regime, is underscored.

In addition, the eNett payments system is intended to curb fraud but may inadvertently become a new avenue for money-laundering and other IFFs in instances where travel bookings do not match passenger or ticket data. Cross-border transactions should be assessed against both regulatory requirements and the underlying business purpose.

- Travel-sector payment flows require enhanced monitoring where large-value transactions are linked to many unrelated customers.
- Virtual account numbers and digital payment tools should be supported by strong transaction monitoring and reconciliation controls.
- Institutions should verify inconsistencies between booking data, passenger details, merchant records, and payment instructions.
- Effective prevention requires information sharing and coordinated action between financial institutions, payment intermediaries, regulators, and law enforcement.

Conclusion

The Zhang Ying Potgieter matter illustrates how technological innovation can be exploited when transaction monitoring does not keep pace with evolving payment methods. A professional control environment must go beyond checking whether a payment appears valid on its face. It must also confirm that the transaction has a legitimate commercial basis, is supported by reliable documentation, and aligns with the customer's profile and declared purpose.

The impact of IFFs

Illicit financial flows (IFFs) negatively affect revenue collection, which limits the allocation of scarce government funds intended for public services and for initiatives aimed at uplifting youth and women (Netshisaulu and Van der Poll, 4:2022). In South Africa, the consequences of IFFs are evident in the state capture era, during which a network allegedly orchestrated primarily by the Gupta family diverted an estimated R50 billion from the state and taxpayers into private Gupta-linked entities through money laundering schemes.

Curbing IFFs

To enhance transparency and curb IFFs, Reuter (2017) suggests the four major components that can be implemented:

- **Country-by-country reporting of profits;**

Policymakers should require multinational companies to publicly disclose their revenues, profits, losses, sales, taxes paid, subsidiaries, and staff levels on a country-by-country basis (Kar and Spanjers, 24:2015).

- **Listing of beneficial ownership of assets;**

To mitigate the risks of financial crimes in south Africa, the CIPC introduced a hard stop functionality requiring each company to submit beneficial ownership declarations alongside their annual returns. "Despite the annual filing obligation, newly incorporated entities are mandated to file their BO information within 10 business days of their incorporation. All other entities are required to file amended BO declarations within 10 business days of any changes occurring to their BO information."

- **Automatic exchange of tax information and,**
- **Anti-money laundering (AML) provisions**

According to Reuter (2017), these attempt to (a) prevent offenders from turning illegally generated moneys into legal funds that can be used for any investment or consumption purpose (b) use the effort to launder moneys to apprehend and punish offenders, including those professionals who help the primary offenders move, conceal or transform the proceeds of crime.

The enablers of IFFs and their roles

Addressing IFFs requires not only holding public officials accountable but also confronting the systemic role of enablers in facilitating and profiting from the act. In most cases those entrusted with regulating certain sectors of the economy are susceptible to influence from that sector, which can control and manipulate the regulatory process and act contrary to the public interest (Pillay, Chitunhu, and Chivandire, 2023). This reflects weaker control systems with little to no accountability and raises concerns on about transparency, fairness, and consequence management.

According to the Global Initiative Against Transnational Organized Crime, South Africa's organised crime economy is not just the work of gangs and enterprise kingpins. It endures because a grey layer[6] of professional enablers – lawyers, accountants, logistics firms, security providers, and real estate companies

[6] https://globalinitiative.net/wp-content/uploads/2025/10/Raphael-Mackintosh-From-gangs-to-grey-agents-A-proposal-to-fortify-South-Africas-organized-crime-laws-against-enablers-GI-TOC-October-2025.pdf

– quietly provide the logistical and operational lifeblood that keeps criminal organisations nimble and resilient.

- **The banking industry**

In enabling IFFs, banks are central to laundering the proceeds of corruption through placement, layering, and integration into the global financial system. They often facilitate suspicious transactions, often ignoring red flags such as large deposits followed by immediate transfers to offshore accounts.

- **The auditors**

Auditors have a duty to identify and report irregularities to regulatory bodies. A conflict of interest exists where this role leads to compromised audit quality by prioritizing profits over legal and ethical obligations. This enables IFFs and undermines accountability mechanisms.

- **The lawyers**

Lawyers play a key role in drafting contracts and agreements that facilitate corruption and may help establish front companies, trusts and shell entities, which can be used to obscure beneficial ownership and facilitate money laundering. Some law firms actively defend corrupt entities, stalling investigations and legal proceedings.

The South African legal framework on illicit financial flows

- Financial Intelligence Centre Act, 38 of 2001 (FICA)
- Prevention of Organised Crime Act, 121 of 1998 (POCA)
- Prevention and Combating of Corrupt Activities Act, 12 of 2004 (PRECCA)

Financial institutions have various duties in respect of their clients and associated persons. These duties are largely articulated in the Financial Intelligence Centre Act[7] (FICA), and compliance with these duties in the spirit in which they are intended, would severely hamper the flow of illicit finance.

An unfortunate lapse in the legislative scheme designed to target or combat money laundering is the focus largely on terrorism financing and not the prevention of the flow of illicit finance with the view of ensuring development. In this regard, it appears that the legislative scheme or framework could be better used for curbing criminal activity and retaining legitimately obtained funds in the local economy.

FICA defines accountable institutions to include attorneys and conveyancers, banks and estate agents, foreign exchange services, credit providers, and those dealing in high-value goods (where the business receives payment in any form to the value of R100 000 or more)[8].

Accountable institutions must, in accordance with their Risk Management and Compliance Programmes[9]:

- Establish and verify the identity of the client.
- Where the client acts on behalf of another person, establish and verify the:
  - identity of that other person (the principal).
  - client's authority to act on behalf of the principal.

[7] Financial Intelligence Centre Act, 38 of 2001
[8] Ibid. Schedule 1.
[9] Ibid. section 21(1)

- Where another person (an agent) acts on behalf of the client, the accountable institution [10]:[11]
  - Establish and verify the identity of the agent and their authority to act on behalf of the client.
  - Obtain information describing, *inter alia*, the source of funds a prospective client expects to use in concluding transactions.

Section 21B of FICA provides that the accountable institution must establish – in the case of legal (or juristic) persons:

- The nature of the client's business.
- The ownership and control structure of the client (establish beneficial ownership) through determining the identity of each natural person who has a controlling interest in the legal person.

Section 21C of FICA clarifies that the duties of an accountable institution are continuous and require that there be ongoing due diligence which includes:

- Monitoring transactions undertaken throughout the course of the relationship, including:
  - The source of the funds to ensure these are consistent with the accountable institution's knowledge of the client, its business, and risk profile.
  - The background and purpose of all complex, unusual large transactions and all unusual patterns of transactions, which have no apparent business or lawful purpose.

Suspicious financial activity

Where an accountable institution suspects that a transaction or activity is suspicious or unusual and it reasonably believes that in performing the customer due diligence requirements it will disclose to the client that a report will be made to the Financial Intelligence Centre (FIC), it may discontinue the due diligence and make a report to the FIC.

Section 21F of FICA deals with foreign politically exposed persons (PEPs) and requires that accountable institutions must:

- Obtain senior management approval for establishing a business relationship.
- Take reasonable steps to establish the source of wealth or funds of the client.
- Conduct enhanced ongoing monitoring of the business relationship.

The accountable institution must also undertake the above exercise in respect of family members and known close associates which would include persons with whom the foreign PEP has an ongoing business relationship[12].

Accountable institutions have a duty not only to establish the necessary information outlined above but also to keep records of their customer due diligence for a period of at least five years in respect of their client's transactions and activities which give rise to a report to the FIC[13].

[11] Ibid. section 21A(c)
[12] Ibid. section 21H
[13] Ibid. section 22

In terms of section 27 the FIC is also empowered to request the accountable institution to advise whether a specified person is or has been a client or acted on behalf of a client (where the client was the principal) or is or has been a client who acted on behalf of another person (where the client was the agent)[14].

The obligation to report a transaction or series of transactions that has no apparent business or lawful purpose or may be relevant to the investigation of tax evasion extends beyond accountable institutions to any “person who carries on business or who is in charge of or manages a business or who is employed by a business and who knows or ought reasonably to have known or suspected that such business is engaged in suspicious or unusual transactions[15]. In this regard, FICA should make it clearer that the proceeds of unlawful activities or property relate not only to offences connected with financing of terrorist or related activities, to better support the measures to combat organised crime as outlined in the Prevention of Organised Crime Act[16] (POCA).

Where an accountable institution (such as a bank) sends or receives more than R20 000 through international electronic funds transfer, it must report the transfer with the prescribed particulars to the FIC[17].

FICA envisages close collaboration with the National Prosecuting Authority in investigating and prosecuting financial crimes. Section 34 provides that, if the FIC, after consulting an accountable institution, has reasonable grounds to suspect that a transaction or proposed transaction may constitute money laundering or a transaction with no apparent business or lawful purpose, it may direct the accountable institution not to proceed with carrying out the transaction for not more than 10 days to allow the FIC to make the necessary inquiries into the transaction and where appropriate, advise an investigating authority and the National Director or Public Prosecutions[18].

Section 42 of FICA provides that accountable institutions must develop, document, maintain, and implement a programme for anti-money laundering, counter-terrorist financing, and proliferation financing risk management and compliance[19]. This section applies regardless of the size of the accountable institution.

FICA also imposes various administrative sanctions for compliance failures by accountable institutions[20]. These include an administrative sanction for an accountable institution’s failure to inform the FIC of information at the request of the FIC[21]. Further, the failure to report suspicious or unusual transactions is an offence[22]. The failure to report the prescribed information in respect of an international electronic transfer of funds (in excess of R20 000) is an offence and subjects the accountable institution to an administrative sanction for non-compliance[23].

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[14] Ibid. section 27
[15] Ibid. section 29
[16] Prevention of Organised Crime Act, 12 of 1998. sections 4 – 6.
[17] Note 3 supra. section 31
[18] Ibid. section 34
[19] Ibid. section 42
[20] Ibid. Chapter 4
[21] Ibid. sections 57 and 58
[22] Ibid. section 52
[23] Ibid. section 56

IFFS THROUGH TRADE MIS-INVOICING, A CASE STUDY

The most common form of IFFs is trade mis-invoicing, which occurs when related parties misrepresent the prices or volumes of goods and services in cross-border transactions to reduce tax liabilities, avoid customs duties, and evade other eligible taxes (Osman & Salifu, 1:2022). Together with practices such as state capture, these activities undermine developing and emerging economies by weakening public revenue systems and distorting government decision-making processes (Collin, 2020).

This case study presents an analysis of Ren-Form CC and associated individuals and companies following a leaked financial report by the FIC. The case study has been limited to desktop research with data gathered from multiple sources. Furthermore, the financial analysis of this report has been limited to the FIC report which conducted an in-depth analysis of the entities and associated persons' financial records.

The contract between Ren-Form CC and the Zimbabwe Electoral Commission

Ren-Form CC, a South African printing company, has been highlighted for its involvement in potential corruption in both the South African elections and the Zimbabwe Electoral Commission's (ZEC) contract. Ren-Form CC, partnering with politically connected tenderpreneur Wicknell Chivayo, was allegedly selected by the ZEC for the supply of ballot papers, biometric voter registration kits, and other election materials.

It is alleged that invoices were inflated by up to 235%. According to an article published by the Daily Maverick[24], in one instance Ren-Form CC had invoiced the ZEC R23-million for a server that normally costs R90 000.00, and charged R68 700.00 for portable toilets which retail for about R10 000.00 per unit.

Analysis on Ren-Form CC

Ren-Form CC, with a registration number **1992/001051/23,** is a close corporation entity registered on 20 January 1992. According to our sources, the entity is under the directorship of Thomas Michel Du Sart – currently the only active member and appointed in May 1992 to date.

Company auditors

J W Dott, Profession code PA-SA based in Fontainebleau, Randburg, Gauteng.

Company assets

There are no movable or immovable assets associated with the entity. However, the entity is registered under the address 137 River Road, Fontainebleau, Randburg 2032, with their head office in Johannesburg, Gauteng.

Chain of events in the contract between Ren-Form CC and ZEC

- On 13 February 2023 Ren-Form CC entered into a contract with Better Brands Security (Pty) Ltd for the purpose of partnering in tenders in Zimbabwe for elections.
- Following the agreement, Ren-Form CC unilaterally changed the contract to partnering with Intratrek Holdings (Pty) Ltd, a company owned by Chivayo, allegedly to implement this agreement.

[24] https://www.dailymaverick.co.za/article/2025-04-08-south-africas-fic-south-african-printing-firm-paid-politically-connected-zimbabwean-agent-r800m/

- Ren-Form CC together with Better Brands Security (Pty) Ltd had already developed quotations for the ZEC as per the requirements of a call for proposals – for example, quotation **Q200220223-2111** was for the supply of Bio Rugged Mark1N biometric voter registration kits valued at **US$2 673 360.00**. However, the quotation from Ren-Form CC and Intratek Holdings (Pty) Ltd with the same products inflated the price to **US$8 964 603.80** which is approximately a 235% increment.
- The awarding of a contract took place based on the second inflated invoice and upon receiving payment from ZEC, Ren-Form CC transferred more than 66% of the money through their Standard Bank account to Intratek's bank account.

Suspicious financial flows

Sourced documents suggest that Ren-Form CC inflated the price of ballot papers, biometric voter registration kits, and portable toilets, while Chivayo, the CEO of Intratek Holdings (Pty) Ltd, made payments to mystery officials and account numbers.

An analysis of Ren-Form CC, Chivayo, and related entities' bank accounts was subsequently done by the FIC and according to the report, there have been allegations of suspicious transactions as follows:

Ren-Form CC suspicious financial flows

- **Ren-Form CC Standard Bank account #1**

Between the period of 3 May 2016 and 21 May 2024 the account was reported to have had cash threshold reporting to the value of R6 756 339.22. According to the report, these were reported on deposits and withdrawals predominantly in the Gauteng region.

- **Ren-Form CC Standard Bank account #2**

A suspicion was reported due to significant payment made to a business account. Furthermore, FIC identified two inward-bound International Funds Transfers payment totalling R180 114 650.00. A further 2 513 International Funds Transfer Reports totalling R2 620 639 856.00 were identified through the South African Reserve Bank.

A large number of payments were made to Ren-Form CC bank accounts – FIC revealed that during the period of 5 April 2023 to 16 May 2024 Ren-Form CC was credited with a grand total of R1 167 364 300.51 (in excess of R1-billion). The funds credited to Ren-Form CC were found to be emanating from the Reserve Bank of Zimbabwe account and from a FirstRand Bank account. These accounts are seemingly from the Zimbabwean Ministry of Finance and Economic Development.

Wicknell Chivayo and Intratrek Holdings (Pty) Ltd suspicious financial flows

Chivayo is a Zimbabwean businessman and socialite who also holds a Kenyan passport. He is the founder and managing director of Intratrek Zimbabwe (Pty) Ltd, an engineering, procurement and construction contractor for energy projects, specializing in delivering comprehensive and innovative energy with offices in Zimbabwe and South Africa. Chivayo allegedly acted as an agent for Ren-Form CC, in the tender with the ZEC.

- **Wicknell Munodaani Chivayo account transactions**

The documents reviewed reveal that between 10 May 2023 and 23 November 2023, a Standard Bank account linked to Chivayo was flagged for suspicious transactions involving rapid movement of funds. Furthermore, the account was credited with multiple internet banking payments from another Standard

Bank account in the name of Intratrek Holdings Pty Ltd, which were later distributed through large interbank transfers while another portion was used to purchase luxuries.

Intratrek Holdings (Pty) Ltd suspicious financial flows

The Standard Bank account belonging to Intratrek Holdings (Pty) Ltd was flagged for rapid movement of funds after the account was credited with a large number of payments from Ren-Form CC using their Standard Bank account #2. This is the Ren-Form CC account that received large amounts of payments from the Zimbabwean Ministry of Finance and Economic Development.

Upon receiving funds from Ren-Form CC, Intratrek Holdings (Pty) Ltd dispersed the money through electronic banking payments to multiple parties.

According to the findings on the FIC report, a significant payment was made to several entities which included motor vehicle dealerships and attorneys.

Funds were also transferred to various bank accounts with different company names as references and was subsequently utilised for lifestyle expenses. For an example, significant payments with references such as "Verve auto", "Vogue auto", "Daytona", and "Mercedes Benz" were made for the purpose of vehicle purchases amounting to R36 500 000.00.

Adverse news

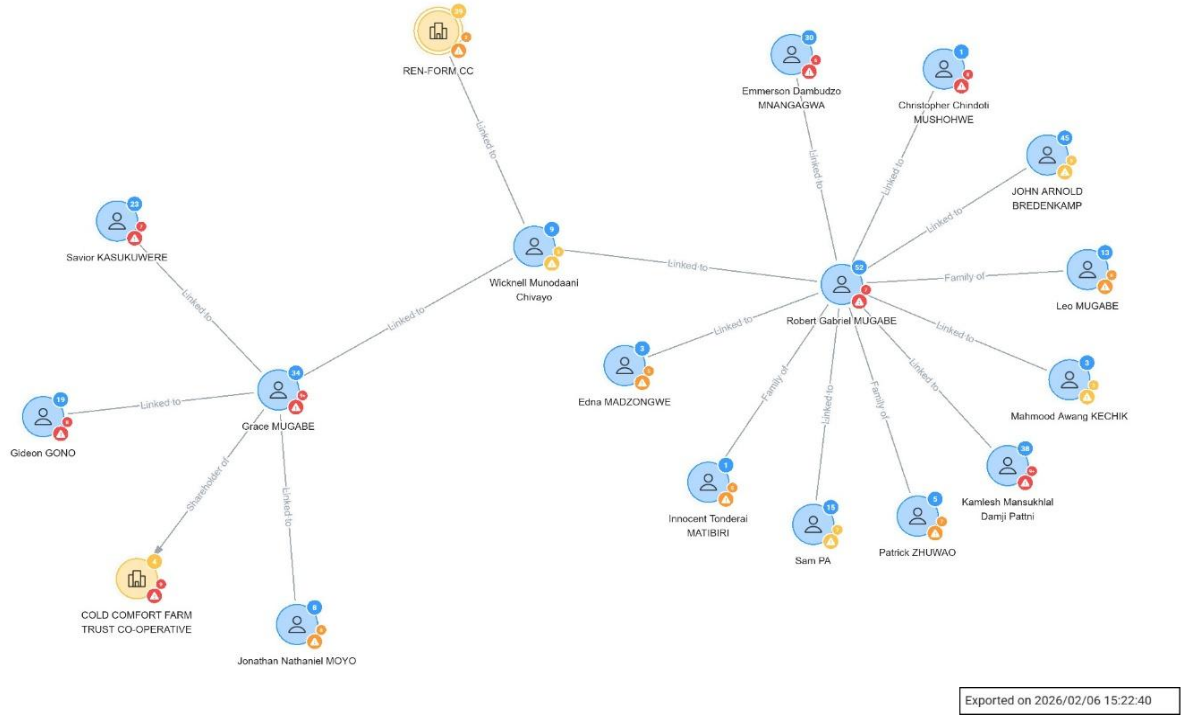
Chivayo has already been implicated in several business dealings in Zimbabwe where, for example, his company Intratrek is alleged to been awarded a US$200 000 000.00 tender for the Gwanda Solar Project in 2015 which to date has seen no meaningful progress. Despite receiving a down payment of US$5 000 000.00 from the Zimbabwe Power Company project, the work was allegedly not implemented. Furthermore, in 2016 Chivayo was implicated in a controversial contract where Intratrek and its partners had been awarded energy contracts totalling approximately US$600 000 000.00. These included a US$73 000 000.00 refurbishment of the Harare power station, a US$163 000 000.00 restoration of Munyati power station, and a US$128 000 000.00 hydropower station at Gairezi[25]*The Source*[26] found that Intratrek's chairman, Ibrahim Yusuf, had a history of drug trafficking in Zambia and selling unapproved circumcision devices in South Africa. Furthermore, he has been linked with various political leaders with his connections prompting allegations of corruption, fraud, and money laundering.

Possible political interference

Chivayo is a prominent figure on social media platforms such as Instagram and Facebook, where he frequently posts about his luxury vehicles, private jets, and large-scale donations. In addition, he is closely aligned with relatives of high-ranking political figures including the late former President Robert Mugabe, and currently maintains a very visible, close relationship with relatives of President Emmerson Mnangagwa.

It is notable that the persons of interests and entities leveraged on these political relationships to secure major contracts leading to unfair business advantages. This could give rise to criminal liability in terms of the Prevention and Combating of Corrupt Activities Act[27].

[26] https://source.co.zw/2016/05/special-report-zimbabwe-hands-600mln-energy-contracts-to-dodgy-dealers/ - this URL was unavailable at the time of editing.
[27] Prevention and Combating of Corrupt Activities Act, 12 of 2004



The above diagram shows Wicknell Chivayo's and Ren-Form CC's connections with key politicians.

Thomas Du Sart - Ren-Form CC director suspicious financial flows

Thomas Du Sart immovable assets: properties

Our search tools reveal that Du Sart owns a total of thirteen (13) properties with the most recent purchased in March 2025. The most recently recorded property according to a search of the Deeds Registry is located in Bassonia, Ekurhuleni Metropolitan Municipality, and was purchased with a total value of R1 059 250.00.

Thomas Du Sart movable assets: vehicles

According to our searches on vehicle ownership, Thomas Du Sart owns a total of 10 luxury vehicles including two Ferraris and four Mercedes Benzes.

The enablers on Ren-Form CC, Intratrek Holdings (Pty) Ltd, and ZEC suspicious financial flows

- **The banking industry**

The banking industry has an oversight role in combating IFFs by acting as the primary gatekeeper for the movement of capital across borders. Emphasis is placed on the banks as the regulators of any suspicious financial activity to act on the warning signs. Looking at the Ren-Form CC, Intratrek, and ZEC transactions, suspicions were identified but there are no measures identified to have been implemented to stop these suspicious transactions. Not only must the banks as accountable institutions take further precautions when dealing with a foreign PEP such as Chivayo, they also have duties to establish the source of wealth of known close associates such as Du Sart, and to enhance ongoing monitoring of the business relationship.

Further, it appears that various, if not most, transactions reviewed in this report required an accountable institution. Many of the transactions in turn created a reporting requirement for the accountable institution.

Recommendations

- Compliance with FICA must be more than a box checking exercise, to ensure that the flow of illicit finance is severely hampered.
- FICA could be further amended to reflect that it also focuses on preventing the flow of illicit finance to ensure development. The current focus on targeting or combating money laundering retains a focus on terrorism financing, which is laudable but does not assist the country achieve its development goals. It further narrows the focus away from the other criminal activities that accountable institutions must be called upon to report.
- The details of immovable property owned by foreign nationals is not readily available. Such information must be recorded and made as readily available regardless of the citizenship or nationality of the parties involved in an immovable property transaction.
- There must be better monitoring of compliance, sanctions, and referrals to prosecution. The investigations and prosecutions must be done in a co-ordinated manner that allow the State to rely effectively on the offences created in various statutes (FICA and POCA).
- In view of the varied degrees of compliance by accountable institutions, the FIC should find ways to better support small-medium accountable institutions in complying with their duties, and review the programmes periodically. To ease the administrative burden on both the FIC and accountable institutions, the FIC could ensure better co-ordination between itself and regulatory/supervisory bodies as well as voluntary associations to which accountable institutions belong. In this regard small-medium accountable institutions should be encouraged to become members of the relevant regulatory/supervisory bodies or voluntary associations to assist with compliance and monitoring.

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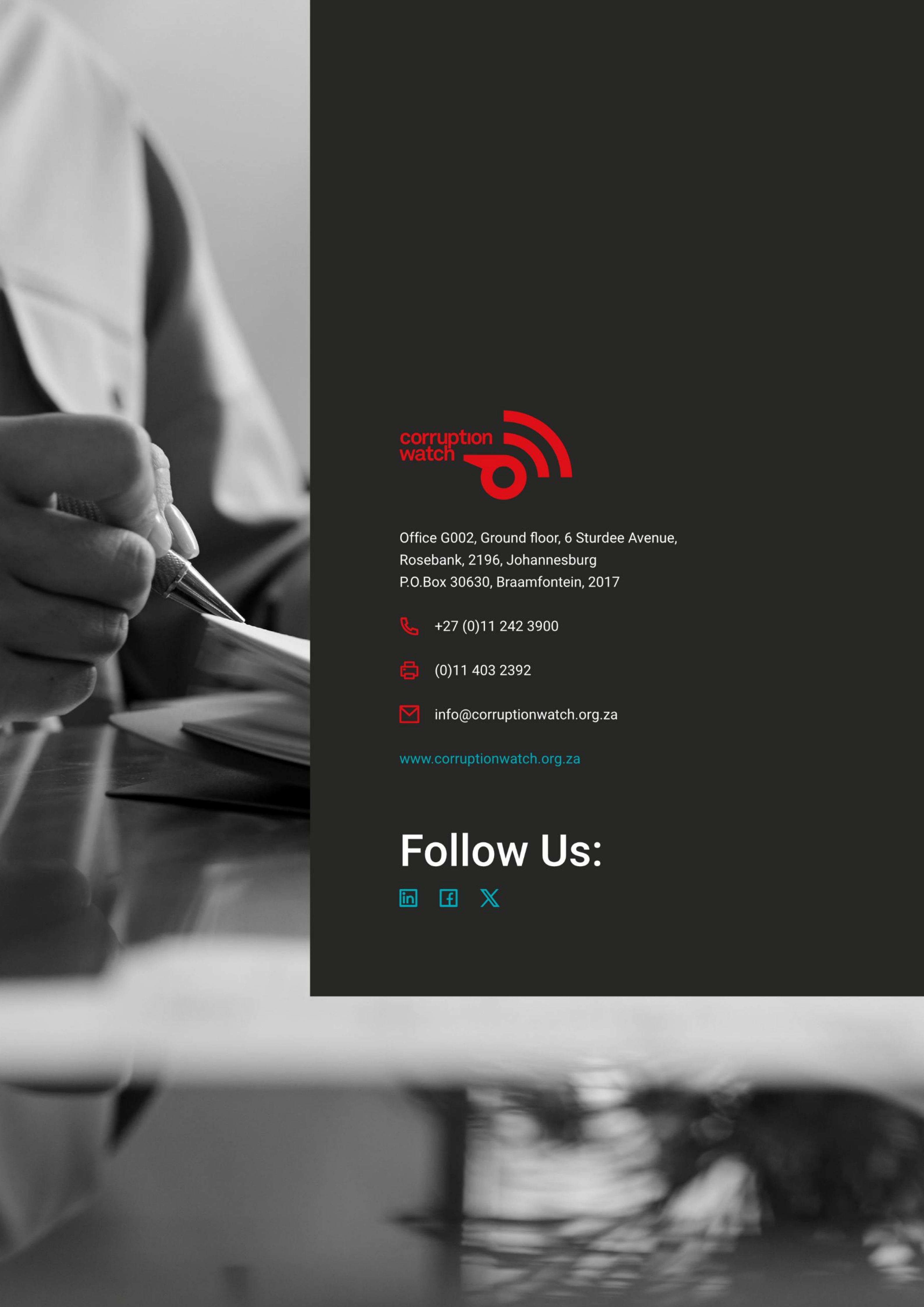
Social media and web presence

The table below details the relevant individuals' social media and web presence

Name	Details
Wicknell Chivayo	Facebook: https://www.facebook.com/SirWicknellChivayo/ Twitter: https://secure.instagram.com/sir_wicknell/ LinkedIn: https://www.linkedin.com/in/wicknell-chivayo-0782002b/
Thomas Michel Du Sart **Not so active on social media.**	LinkedIn: https://www.linkedin.com/in/tommy-du-sart-22b51444/



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