



Politically Exposed Persons Policy

Version 1.6

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Approved by the Board of Trustees on 31 March 2022

SIGNED BY THE CEO:

Date: _____

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1. Document Administration

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1.1. Revision Summary

Policy Name	Version	Approval date
Politically Exposed Persons Policy	1.6	31 March 2022

1.2. Review

Frequency of review	Next review date	Last review date
Annual	31 March 2023	31 March 2022

1.3. Version Control

Reviewed by	Review date (dd / mm / yyyy)	Review time (0h:0m)

2. Summary of terminology

In this Policy, unless the context indicates a contrary intention, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings:-

2.1. Definitions and acronyms

2.1.1. "**ABC**" means Anti-Bribery and Corruption

2.1.2. "**AML**" means Anti-Money Laundering

2.1.3. "**Board**" means the GPF Board of Trustees

2.1.4. "**BRA**" means the Business Risk Assessment

2.1.5. "**Bribery**" means the offering, giving, receiving, or requesting of something of value or gratification for the purpose of influencing the action of a person in authority in the execution of his / her public or legal duties

2.1.6. "**Business Relationship**" means an arrangement between a client / service provider and GPF for the purpose of concluding transactions. Specifically, in the case of GPF, a business relationship begins at the start of the investment due diligence process and forms part of any Transaction

2.1.7. "**CDD**" means Customer Due Diligence

2.1.8. "**CEO**" means Chief Executive Officer

2.1.9. "**CFT**" means Countering the Financing of Terrorism

2.1.10. "**CIV**" means Customer Identification and Verification

2.1.11. "**Client**" means a Natural Person or Juristic Person who enters into a business relationship with GPF in terms of which GPF provides funding to that Natural Person or Juristic Person.

2.1.12. "**Competent Authorities**" means a public authority, with designated responsibilities for combating terrorist financing and money laundering that has the authority to issue financial Sanctions against Natural Persons, Groups, Juristic Persons and / or Countries to prevent and suppress terrorism, terrorist financing and money laundering.

2.1.13. "**Corruption**" as per the definition in section 3 of the Prevention and Combatting of Corrupt Activities Act No. 12 of 2004, means an offence of any person who directly or indirectly:

2.1.13.1. Accepts or agrees or offers to accept any gratification from any other person whether for the benefit of himself or herself or for the benefit of another person; or-

2.1.13.2. Gives or agrees or offers to give to any other person any gratification whether for the benefit of that other person or for the benefit of another person,

In order to act personally or by influencing another person to act, in a manner

2.1.13.3. That amounts to the:

2.1.13.3.1. Illegal, dishonest, unauthorised, incomplete or biased; or

2.1.13.3.2. Misuse or selling of information or material acquired in the course of exercising, carrying out or performing of any powers, duties or function arising out of a constitutional, statutory, contractual or other legal obligation;

2.1.13.4. That amounts to:

2.1.13.4.1. The abuse of a position of authority;

2.1.13.4.2. A breach of trust; or

2.1.13.4.3. The violation of a legal duty or a set of rules,

2.1.13.5. Designed to achieve an unjustified result; or

2.1.13.6. That amounts to any other unauthorised or improper inducement to do or not do anything,

Is guilty of the offence of corruption

2.1.14. "**CRA**" means Customer Risk Assessment

2.1.15. "**CTR**" means Cash Threshold Report

2.1.16. "**DPIP**" means Domestic Prominent Influential Person

2.1.17. "**EDD**" means Enhanced Due Diligence

2.1.18. "**Employee**" means for the purposes of this document, Employees of GPF, regardless of specific roles and responsibilities, department or location, and shall include:

2.1.18.1. Permanent Employees;

2.1.18.2. Employees on a fixed term contract;

2.1.18.3. Secondees;

2.1.18.4. Representatives of GPF; and

2.1.18.5. Third party contractors

2.1.19. "**Exposure**" means an act or omission whereby GPF has not met its statutory, supervisory and / or regulatory requirements which has led to a risk event

2.1.20. "**FATF**" means Financial Action Task Force

- 2.1.21. "**FIC**" means Financial Intelligence Centre
- 2.1.22. "**FICA**" means Financial Intelligence Centre Act, No. 38 of 2001 as amended by Act, No. 1 of 2017
- 2.1.23. "**FPO**" means Foreign Public Official
- 2.1.24. "**GPF**" means Gauteng Partnership Fund
- 2.1.25. "**Juristic Person**" for the purposes of this Policy, means a local or foreign entity (whether incorporated or not) that includes a company, close corporation, a trust, fund, organisation, a partnership etc. as opposed to a Natural Person
- 2.1.26. "**LCRM**" means Legal, Compliance and Risk Manager
- 2.1.27. "**Management**" means a person who is an executive committee member and who is responsible for executive management and oversight over a business operation within GPF
- 2.1.28. "**ML**" means Money Laundering
- 2.1.29. "**MLCO**" means Money Laundering Control Officer
- 2.1.30. "**Monthly**" means in terms of the respective policies and MOS', a period of 30 days, and not a calendar month. Therefore, reporting, for example, should be performed every 30 days, from the date as decided by the LCRM
- 2.1.31. "**MOS**" means the Minimum Operating Standard
- 2.1.32. "**Natural Person**" means a human being, as opposed to a Juristic Person
- 2.1.33. "**ODD**" means Ongoing Due Diligence
- 2.1.34. "**Politically Exposed Persons ("PEPs")**" is defined in FICA (Sections 21F-G) and recognises two (2) categories of PEPs, namely: 1. Domestic Prominent Influential Persons ("DPIPs"); and 2. Foreign Public Officials ("FPOs")
- 2.1.35. "**PRA**" means the Product Risk Assessment
- 2.1.36. "**PRECCA**" means the Prevention and Combating of Corrupt Activities Act, 12 of 2004
- 2.1.37. "**RBA**" means the Risk Based Approach
- 2.1.38. "**RMCP**" means the Risk Management and Compliance Programme
- 2.1.39. "**RMF**" means the Risk Management Framework

2.1.40. "**Sanctions**" are restrictive measures imposed by Competent Authorities against natural persons, groups¹, Juristic Persons and / or Countries to prevent and suppress terrorism and terrorist financing

2.1.40.1. There are 3 Sanctions categories:

2.1.40.1.1. Comprehensive sanctions - Blanket sanctions against the entire country, e.g. the US sanctions against Cuba;

2.1.40.1.2. Limited sanctions - Limited to certain subject matters of target countries, e.g. political regime, arms, rough diamonds, anti-terrorism, drugs trafficking; and

2.1.40.1.3. Specific sanctions - Targeted at specific persons, e.g. individuals / entities of countries, e.g. Muammar Ghaddafi, the former President of Libya

2.1.41. "**Service Provider**" means third parties who are natural or juristic persons with whom GPF contracts for the rendering of specific services (e.g. Suppliers, sub-contracted suppliers, third parties etc.)

2.1.42. "**Source of Funds**" means the origination of the funds that the client expects to use in concluding transaction/s in the course of the business relationship with GPF

2.1.43. "**Source of Wealth**" refers to the activities that have generated the total net worth of the client's activities that produced the client / service provider's wealth. Wealth of a person could be as a result of a number of different activities over a period of time

2.1.44. "**Suspicious Transactions Report ("STR")**" means a confidential report submitted to a Competent Authority for a suspicious transaction or activity by a client or service provider, in terms of section 29 of the Financial Intelligence Centre Act No. 38, 2001 as amended by Act No. 1 of 2017

2.1.45. "**TF**" means Terrorist Financing

2.1.46. "**Terrorist Property Report ("TPR")**" means a confidential report submitted to a Competent Authority in terms of sections 28A of the Financial Intelligence Centre Act No. 38, 2001 as Amended by Act No. 1 of 2017, for a suspicion of a transaction involving terrorist property owned or controlled by or on behalf of a client / service provider

2.1.47. "**Transaction**" means any activity between GPF and a Client / Service Provider:

2.1.47.1. Concluded in the course of a Business Relationship; or

2.1.47.2. Other than a transaction concluded in the course of a Business Relationship (once off / single transaction).

¹ "Groups" are inclusive of Terrorist Groups, Religious Groups, Financial Groups, etc.

- 2.1.47.3. Specifically, a transaction from the perspective of GPF will include amongst others:
- 2.1.47.3.1. Capital raising where public sector funds are utilised to leverage additional funding and facilitate capital flows into integrated sustainable human settlements;
 - 2.1.47.3.2. Project Preparation where GPF perform feasibility studies in order to attract sources of capital;
 - 2.1.47.3.3. Project Financing where GPF act as a source of finance in order to attract additional funding sources;
 - 2.1.47.3.4. Project Implementation where GPF assist by providing an oversight role on the development of any housing development project; and
 - 2.1.47.3.5. Property Development where GPF plays the role of attempting to unlock the value of the land for future development
- 2.1.48. **"Ultimate Beneficial Owner ("UBO")"** means in respect of a Juristic Person, a natural person who independently or together with another natural person, directly or indirectly:-
- 2.1.48.1. Owns the Juristic Person; or
 - 2.1.48.2. Exercises effective control of the Juristic Person.

2.2. Document Inventory

Document	Purpose
Risk Based Approach Framework	The RBA provides a framework that will enable GPF to identify, assess and understand its money laundering and terrorist financing risks in relation to its business operations, funding products and clients.
Anti-Money Laundering, Countering the Financing of Terrorism and Sanctions Governance Framework	The purpose of the Governance Framework is to support the AML / CFT Policy, PEP Policy and Sanctions Policy by indicating AML, CFT and Sanctions ownership as well as the associated main roles and responsibilities as the basis to integrate it into an effective AML, CFT and Sanctions risk management process.
Sanctions Policy	This Policy provides an overview of the various standards within which GPF should operate in relation to matters regarding sanctions. The Policy is intended to assist the Board and Senior Management in the fulfilment of their respective responsibilities for oversight and management of GPF's sanction risks.

Document	Purpose
Anti-Bribery and Corruption Policy	The Anti-Bribery and Corruption Policy provides ways to prevent acts of bribery and corruption within the organisation as GPF is obliged to comply with domestic legislation that gives effect to the prevention of bribery and corruption, such as the Prevention and Combatting of Corrupt Activities Act No. 12 of 2004.
Anti-Money Laundering / Countering the Financing of Terrorism Minimum Operating Standard	This document introduces standards, structures, procedures and internal controls to ensure that AML / CFT statutory, supervisory and regulatory requirements are satisfied.
Sanctions Minimum Operating Standard	This document is designed to provide standards, structures, procedures and internal controls to ensure that GPF employees know how to identify and manage risks associated with sanctions.

3. Introduction

- 3.1. GPF is committed to acting with integrity in all business dealings. Consistent with this objective, GPF is committed to conducting its activities in accordance with applicable laws and regulations relating to Anti-Money Laundering (“**AML**”) and Countering the Financing of Terrorism (“**CFT**”). Therefore, the aim of this Policy is intended to prevent GPF from being misused to facilitate Money Laundering (“**ML**”) and Terrorist Financing (“**TF**”), and establishes specific principles that apply unilaterally across GPF in respect of Politically Exposed Persons.
- 3.2. GPF, by means of this Policy, introduces standards, framework, procedures and internal controls to mitigate against risks associated with ML and TF from Politically Exposed Persons (“**PEPs**”)². GPF’s AML / CFT policies, procedures, and all related internal controls should be reviewed and revised on an annual basis to ensure that GPF’s AML / CFT regime remains up to date and robust.

4. Policy Statement

- 4.1. GPF is committed to:
- 4.1.1. Building its organisation based on trust and integrity, for the benefit of all its stakeholders, including its clients / service providers and its employees;
 - 4.1.2. Conducting its business in compliance with AML / CFT statutory, supervisory and regulatory requirements by preventing, mitigating and managing ML and TF risks associated in dealing with Natural and Juristic persons;
 - 4.1.3. Setting out the roles and responsibilities of all internal stakeholders in relation to statutory, supervisory and regulatory AML / CFT requirements;
 - 4.1.4. Developing and implementing an AML / CFT policy, procedures and controls to comply with statutory, supervisory and regulatory AML / CFT requirements in order to protect GPF and its employees from potential reputational damage;
 - 4.1.5. Ensuring that transactions with PEPs are at arm’s length. Where these transactions or relationships are assessed as posing higher ML and / or TF risks, that they are subjected to additional due diligence requirements and scrutiny to ensure compliance with laws and regulations, especially with sections 21F and 21G of FICA; and
 - 4.1.6. Dealing with transgressors of this PEP Policy by, for example, instituting disciplinary proceedings against such transgressors.

² For the purposes of all GPF policies and minimum operating standards a PEP will either refer to a Domestic Prominent Influential Person (“**DPIP**”) or a Foreign Public Official (“**FPO**”).

5. Scope

- 5.1. This Policy applies to GPF including any, partnership, associations, all funding structures or other arrangements where GPF exercises management control. GPF and any such partnerships, associations or other arrangements should:
- 5.1.1. ascribe and align to this policy in order to mitigate any ML, TF and sanctions risks identified; and
 - 5.1.2. implement and apply at all times the AML / CFT measures consistent with legislation and relevant applicable FATF recommendations.

6. Identifying ML / TF risks associated with PEPs

- 6.1. A PEP is defined by FATF as an individual who is or has been entrusted with a prominent public function. Due to their position and influence, it is recognised that many PEPs are in positions that potentially can be abused for the purposes of committing ML offences and related predicate offences, including corruption and bribery, as well as conducting activity related to TF. Therefore, the potential risks associated with PEPs justify the application of additional AML / CFT preventative measures with respect to business relationships with PEPs. PEPs pose higher ML risks for GPF given the fact that GPF is itself a government entity, its ownership, leadership and executive committee comprises PEPs. PEPs can therefore influence the provision of funds and / or contracts for GPF's funding products. In order to mitigate risks associated with PEPs, Section 21H of FICA (and in line with international best practice) provides that *immediate family members* and *known close associates* should also be identified.
- 6.2. FICA (Sections 21F-G) recognises two (2) categories of PEPs, namely:
- 6.2.1. Domestic Prominent Influential Persons (“**DPIPs**”); and
 - 6.2.2. Foreign Public Officials (“**FPOs**”).
- 6.3. These are further explained below.
- 6.4. **DPIPs**
- 6.4.1. A DPIP, according to Schedule 3A of FICA is an individual who holds or has been entrusted with a prominent influential / public function, either permanently or temporarily, for a period exceeding six (6) months, or has held at any time in the preceding 12 months, in the Republic of South Africa. Reference should be made to **Appendix A** of this Policy which provides a list of prominent influential / public functions.

6.5. FPOs

6.5.1. A FPO on the other hand, is an individual who holds, or has been entrusted with a prominent public function in a foreign country at any time in the preceding twelve (12) months. Therefore, for ease of reference, FPOs according to Schedule 3B are listed in **Appendix A** of this Policy.

6.6. Close Family Members and Known Close Associates

6.6.1. As mentioned previously, due to the risks associated with PEPs, Section 21H of FICA, requires that “close family members” and “known close associates” of PEPs (both domestic and foreign) should be identified.

6.6.2. Thus “*Close family members*” include relations through direct consanguinity or through marriage or (civil) forms of partnership, such as, but not limited to:

6.6.2.1. Spouses, civil partners or life partners;

6.6.2.2. A previous spouse, civil partner or life partner, if applicable;

6.6.2.3. Children and stepchildren, their spouses and civil partners or life partners;

6.6.2.4. Parents;

6.6.2.5. Siblings and stepsiblings and their spouses, civil partners or life partners; and

6.6.2.6. Other blood relatives and relatives by marriage.

6.6.3. “*Known close associates*” are individuals who are widely and publicly known to be closely connected to a PEP, either socially or professionally. A known close associate includes, but is not limited to, a person who has a:

6.6.3.1. Close business and / or social relations with a PEP (including mistresses, friends, boyfriends and girlfriends etc.);

6.6.3.2. Joint beneficial ownership of a legal entity or legal arrangement with a PEP; and

6.6.3.3. Sole beneficial ownership of a legal entity or legal arrangement, which has been set up for the benefit of a person who is a PEP.

6.6.4. Any additional AML / CFT measures imposed by GPF on PEPs (including their close family members and known close associates), should not be interpreted to stigmatise a PEP as being involved in any criminal activity. Thus, GPF does not advocate the refusal of a business relationship with a person simply based on their PEP status.

7. Politically Exposed Persons Control Principles

7.1. Principle 1: Client / Service Provider Screening

- 7.1.1. All prospective and existing client / service providers should be screened for their PEP status using approved third-party lists such as Dow Jones, and World Check or any other such list(s) that can reasonably be expected to provide such confirmation. GPF should maintain and update a comprehensive list.
- 7.1.2. In addition to the use of third-party lists, GPF may manually determine the PEP status of the client if it is revealed during conversations with the client or through the use of a mandatory field on the on-boarding form.
- 7.1.3. Prospective clients / service providers should be screened for their PEP status at the on-boarding stage as part of the client / service provider due diligence process. PEP screening of the existing client / service provider base should be updated on a regular basis including when there are any changes to the relevant PEP lists or when an event occurs that triggers PEP screening.
- 7.1.4. All business relationships should be reviewed in line with the frequency stipulated in the AML / CFT Policy to determine if the business relationship has been entered into with another natural or juristic person for the benefit of a PEP.

7.2. Principle 2: Client / Service provider investigation

- 7.2.1. Where a prospective client / service provider or existing client / service provider is identified as a potential PEP, or close family member or known close associate of a PEP, an investigation should be conducted by the LCRM, in order to confirm the status of such individual as a PEP.
- 7.2.2. Once it is confirmed that the client / service provider is a PEP, Section 21F – Section 21H of FICA applies. GPF should obtain senior management approval before entering into a business relationship with a PEP. This approval should be in accordance with the approved delegation of authority. GPF should take reasonable measures to establish the source of wealth and source of funds of the client / service provider and conduct enhanced ongoing monitoring of the business relationship.
- 7.2.3. This additional information obtained from the client is particularly useful for initial EDD and ODD purposes as it ensures that the level and type of transactions are consistent with GPFs

knowledge of the PEPs financial overview. The aim is to ensure that the reason for the business relationship is commensurate with what GPF could reasonably expect from the PEP, given his / her particular circumstances.

7.3. Principle 3: Enhanced due diligence procedures

- 7.3.1. Once a prospective or existing client / service provider is confirmed to be a PEP, a close family member or known associate of a PEP, then the client / service provider should be categorised accordingly in terms of GPF's adopted RBA. Enhanced due diligence should be performed in accordance with the GPF AML / CFT Minimum Operating Standard ("MOS") for all PEP relationships assessed as being high risk. For clarity, not all relationships with PEPs, their family members and close known associates are deemed to automatically be high risk, unless this is documented as such in GPF's risk based approach.
- 7.3.2. Ongoing monitoring of the business relationship with PEPs that have been assessed and categorised as high risk is required annually.
- 7.3.3. The review of the business relationship and re-categorisation of the client / service provider as a PEP may lead to a decision to exit the business relationship if it is determined that the continued existence of the business relationship poses a risk that is not within GPF's risk appetite. The re-categorisation, de-categorisation and decision to exit the business relationship should be approved by the LCRM.
- 7.3.4. In instances where the PEP is a sanctioned individual, the business relationship should be terminated in accordance with the termination process detailed in the Sanctions MOS.

7.4. Principle 4: Records management

- 7.4.1. GPF should obtain, manage and maintain records as prescribed in GPF's AML / CFT Policy that forms part of the document inventory in section 2.2 of this Policy.

7.5. Principle 5: Training and awareness

- 7.5.1. GPF should create awareness amongst employees on the contents of this Policy as prescribed in GPF's AML / CFT Policy that forms part of the document inventory in section 2.2 of this Policy.

8. Breach of this Policy

8.1. It is the responsibility of every employee to comply with this policy and failure to do so could amount to gross misconduct and a material breach of the contract of employment.

9. Dispensations

9.1. GPF should permit dispensations from the application of this Policy in line with the requirements and guidelines prescribed in GPF's AML / CFT Policy, which forms part of the document inventory in section 2.2 of this Policy.

10. Exemptions

10.1. GPF should permit exemptions of this Policy in line with the requirements and guidelines prescribed in GPF's AML / CFT Policy, which forms part of the document inventory in section 2.2 of this Policy.

11. Monitoring, review and compliance

11.1. Policy Review

11.1.1. This policy is subject to annual review or as and when necessary, to ensure that it is aligned to prevailing resolutions, regulations and market conditions.

11.1.2. Confirmation of the review will be provided in line with the GPF governance process and where relevant include the Audit and Risk Committee.

11.2. Policy Amendments

11.2.1. No amendment(s) may be made to any section(s) of this policy without such amendment(s) first being discussed and validated against prevailing acts, standards, best practises and regulations.

11.2.2. Policy amendments will need to be approved through the relevant GPF governance forums including the Audit and Risk Committee.

11.3. Policy Compliance

11.3.1. Legal, Compliance and Risk will provide compliance assurance and determine whether the approved policy provisions are put in place in each Business Unit.

11.3.2. The Audit and Risk Committee will be provided with feedback on the effectiveness of which the Business Unit has implemented the requirements of the policy.

12. Approval

12.1. This policy is approved by the Board and signed by the CEO.

APPENDIX A – PEP CATEGORIES

Domestic Prominent and Influential Persons

DPIP : DOMESTIC PROMINENT INFLUENTIAL PERSON	
FIC Amendment Act – Schedule 3A	
1.	The President or Deputy President
2.	A government minister or deputy minister
3.	The Premier of a province
4.	A member of the Executive Council of a province
5.	An executive mayor of a municipality elected in terms of the Local Government: Municipal Structures Act, 1998
6.	A leader of a political party registered in terms of the Electoral Commission Act, 1996
7.	A member of a royal family or senior traditional leader as defined in the Traditional Leadership and Governance Framework Act, 2003
8.	The head, accounting officer or chief financial officer of a national or provincial department or government component, as defined in section 1 of the Public Service Act, 1994
9.	The municipal manager of a municipality appointed in terms of section 54A of the Local Government: Municipal Systems Act, 2000, or a chief financial officer designated in terms of section 80 (2) of the Municipal Finance Management Act, 2003
10.	The chairperson of the controlling body, the chief executive officer, or a natural person who is the accounting authority, the chief financial officer or the chief investment officer of a public entity listed in schedule 2 or 3 to the Public Finance Management Act, 1999
11.	The chairperson of the controlling body, chief executive officer, chief financial officer or chief investment officer of a municipal entity as defined in section 1 of the Local Government: Municipal Systems Act, 2000
12.	A constitutional court judge or any other judge as defined in section 1 of the Judges' Remuneration and Conditions of Employment Act, 2001
13.	An ambassador or high commissioner or other senior representatives of a foreign government based in the Republic of South Africa

DPIP : DOMESTIC PROMINENT INFLUENTIAL PERSON	
FIC Amendment Act – Schedule 3A	
14.	An officer of the South African National Defence Force above the rank of major-general
15.	The position of: <ul style="list-style-type: none"> ○ Chairperson of the board ○ Chairperson of the Audit and Risk Committee ○ Chief financial officer of a company, as defined in the Companies Act, 2008, if the company provides goods or services to an organ of state and the annual transactional value of the goods or services or both exceeds an amount determined by the Minister by notice in the Gazette
16.	The position of head, or other executive directly accountable to that head, of an international organisation based in the Republic of South Africa

Foreign Public Official

FPO: FOREIGN PUBLIC OFFICIAL	
FIC Amendment Act – Schedule 3B	
1.	Head of State or head of a country or government
2.	A Member of a foreign royal family
3.	Government minister or equivalent senior politician or leader of a political party
4.	A member of the Executive Council of a province
5.	Senior judicial official
6.	Senior executive of a state-owned corporation
7.	High-ranking member of the military