WILTEX DIRECT

LOGISTICS & TOWING PLATFORM

COMPLIANCE DOCUMENT

KYC & IDENTITY VERIFICATION POLICY

DOCUMENT REFERENCE	EFFECTIVE DATE	TARGET AUDIENCE	COMPLIANCE STATUS
POL-KYC-2026-V1	**August 2026**	**Payment Partners & Auditors**	**Fully Compliant**

1. EXECUTIVE SUMMARY & REGULATORY FRAMEWORK

WilteX Direct (Pty) Ltd operates an automated towing and cargo logistics SaaS platform linking vetted transport service providers with individual consumers and corporate clients. To mitigate financial crime, identity fraud, money laundering, and operational liabilities, WilteX Direct maintains a strict mandatory **Know Your Customer (KYC)** and risk-based identity verification framework.

> **Mandatory Vetting Clause:** No transport provider, individual driver, or fleet operator is permitted to accept freight/towing tasks or initiate bank payouts on the WilteX Direct platform without successfully passing full identity, document, and operational verification.

This policy is structured in compliance with the South African *Financial Intelligence Centre Act (FICA) 38 of 2001* (as amended), the *Protection of Personal Information Act (POPIA) 4 of 2013*, and standard risk management benchmarks enforced by acquiring financial institutions and payment gateways.

2. SCOPE OF IDENTIFICATION & VERIFICATION REQUIREMENTS

WilteX Direct categorizes onboarded entities into three structural tiers: Individual Transport Partners, Fleet/Business Partners, and Vehicle Operational Vetting. Detailed data requirement matrices are defined below:

2.1 Individual Driver / Transport Partner Vetting

Data Field / Requirement	Validation Document	Requirement	Verification Method
Full Legal Name & Identity	South African National ID Card / Smart ID / Valid Passport	Mandatory	Automated ID database checksum & OCR extract cross-referenced against government databases.
Biometric Facial Verification	Live Selfie / Biometric Capture	Mandatory	Liveness detection and 1:1 biometric matching against ID photograph to prevent impersonation.
Contact Credentials	Mobile Number & Email Address	Mandatory	One-Time Pin (OTP) SMS verification & email activation link.
Physical Address	Proof of Residence (< 3 months old: Utility Bill, Bank Statement)	Mandatory	Manual audit & OCR address extraction compliant with FICA requirements.
Driver Accreditation	Valid South African Driver's Licence	Mandatory	Licence code check, expiration date audit, and visual anti-tampering inspection.
Professional Driver Permit	PrDP Endorsement	Conditional	Mandatory for heavy goods and specialized towing operators as required by SA road transport laws.

Data Field / Requirement	Validation Document	Requirement	Verification Method
Payout Bank Account	Bank Account Confirmation Letter / Stamped Statement	Mandatory	Account Name Matching (AVS) via payment engine — bank account holder must match KYC identity.

2.2 Fleet Operators & Corporate Partners

Data Field / Requirement	Validation Document	Requirement	Verification Method
Entity Legal Identification	CIPC Registration Documents (COR14.3 / COR39)	Mandatory	CIPC portal lookup verifying active company status, registration number, and registered address.
Authorized Representative	Director ID / Authorized Officer Identity Document	Mandatory	Full KYC vetting on key directors/ representatives holding signing authority.
Tax / VAT Registration	SARS VAT Registration Certificate	Conditional	SARS eFiling verification for tax compliance and VAT invoice processing where threshold is met.
Corporate Banking	Official Bank Confirmation Letter (< 3 months)	Mandatory	Strict matching of business name and registration number against banking settlement accounts.
Fleet Inventory Management	Fleet Authorization Registry	Mandatory	Audit of driver assignment records connecting specific vehicles to authorized drivers.

2.3 Vehicle Operational & Asset Compliance

Data Field / Requirement	Validation Document	Requirement	Verification Method
Vehicle Ownership / License	Current Vehicle Licence Disc & Registration Certificate	Mandatory	Expiration monitoring and VIN/Engine number verification against asset database.
Roadworthiness Certification	Valid Roadworthy Certificate (RWC)	Conditional	Required for vehicles operating above specified weight classes or public service profiles.
Commercial Insurance	Comprehensive Goods-in-Transit / Towing Insurance Policy	Mandatory	Verification of active coverage dates, insurer details, and minimum liability thresholds.
Vehicle Visual Audit	Four-Angle High-Res Photographs	Mandatory	Visual inspection verifying license plate match, vehicle condition, and specialized towing equipment.
Third-Party Authorization	Owner Authorization Letter / Lease Agreement	Conditional	Required whenever the platform driver is not the primary registered owner of the vehicle.

3. MULTI-STAGE KYC VERIFICATION WORKFLOW

1 Data Ingestion	2 Automated Check	3 Document Audit	4 Activation & Pay
Driver submits personal data, ID, driver's license, and banking details via secure encrypted app interface.	OCR extracts text; liveness facial scan matches live selfie against submitted ID card photo.	Compliance team inspects vehicle insurance, license disc, and bank account ownership alignment.	Upon 100% clearance, transport partner profile is set to Active, enabling jobs and merchant payouts.

4. ONGOING MONITORING & RISK MANAGEMENT

- **Automated Expiration Tracking:** System automatically prompts drivers 30 days prior to the expiration of their driver's licence, PrDP, vehicle licence disc, or insurance policy. Failure to upload renewed documentation results in immediate platform suspension upon expiry.
- **Payout Bank Account Integrity (AVS):** Settlements are strictly locked to bank accounts where the account holder name matches the verified individual or corporate entity. Third-party payouts are strictly prohibited.
- **Sanctions & PEP Screening:** Periodic batch screening of registered entity directors and individuals against international PEP (Politically Exposed Persons) and global sanctions watchlists.
- **Fraud & Abuse Safeguards:** Real-time device fingerprinting and geolocation tracking prevent account sharing and unauthorized vehicle usage.

5. DATA PRIVACY, STORAGE & POPIA COMPLIANCE

In accordance with the *Protection of Personal Information Act (POPIA)*, all KYC data collected by WilteX Direct is encrypted in transit via TLS 1.3 and at rest utilizing AES-256 encryption. Access to compliance records is strictly restricted to authorized compliance personnel. Data is stored for the duration of the operational relationship plus statutory retention periods required under South African law.

Issued & Approved By:

WilteX Direct (Pty) Ltd

Compliance & Risk Management Department
Email: compliance@wiltexdirect.co.za

Target Partner Inquiry Contact:

Merchant Operations & Onboarding

Johannesburg, South Africa
Status: Active & Auditable Policy