

Dr. Sasha Songca-Monyamane

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Objective

This resume introduces Dr. Sasha Songca-Monyamane

I am a female lawyer who has served in senior management positions in different industries (telecommunications, financial services, lottery) and in the academic field. I am a member of the Institute of directors who has served as a non -executive director and member of the Audit committee of the Board.

I have a strong academic background, having schooled and qualified in different countries.

My versatility is reflected in my qualifications, further learning, as well as in the diversity of my work experience and achievements.

Employment History

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|--|--------------|
| 1. University of Tasmania: | 1984- 1985 |
| - Tutor: Property Law and Introduction to Law | |
| 2. National university of Lesotho | 1986- 2001 |
| - Lecturer, Tutor, Head of department, Deputy Dean, Acting Dean | |
| 3. Uthingo Management (Pty) Ltd (1st SA National lottery Operator): | 2001-2004 |
| - Head Of Compliance | |
| 4. Vodacom Group Limited and Vodacom SA | 2004- 2013 |
| - Head of department, | 2004-2006 |
| - Group Executive, | 2006-2011 |
| - Managing Executive | 2012- 201 |
| 5. Graduate School of Business Leadership, UNISA | 2014-TO DATE |
| Associate Professor: Corporate Governance | 2014 - 2022 |
| Acting Chief Operating Officer, | 2016-2018 |

OTHER PROFESSIONAL ENGAGEMENTS

Board Memberships

| | |
|---|------------|
| Non Executive Director, The Central Bank of Lesotho | 1998- 2001 |
| Non Executive Director and Member of the Audit Committee: Vodacom Lesotho (Pty) Ltd | 2000- 2003 |
| Board Advisor : Graduate School of Business Leadership, UNISA | 2016- 2018 |
| Education | |
| Doctor of Philosophy, Ph.D. Strathclyde University, Glasgow, Scotland | 1993-2000 |
| Master of Laws, LL.M: Monash University, Australia | 1982-1984 |
| Bachelor of Laws LLB: National University of Lesotho, Lesotho | 1980 -1982 |
| Bachelor of Arts (Law): National University of Lesotho | 1976- 1980 |

Further education (selected)

| | |
|---|------|
| INSEAD College, Singapore, Finance for Executives Program | 2013 |
| Association of Anti-Money Laundering Experts (ACAMS): Certificate in Money Laundering | 2012 |
| ICA: Certificate in Anti Maoney Laundering (AML) Awareness | 2010 |
| FCPA training | 2008 |

Workshops : I have participated in various workshops throughout my career

EXPERIENCE IN DETAIL

- 1. GRADUATE SCHOOL OF BUSINESS LEADERSHIP (SBL) UNISA** **2014-**
To date
 - Analysing SBL Business, business processes and strategy, leading the organisations's business strategy review and development
 - Leading the development of a new business model and project for the implementation of the school's new business model
 - Development and leading the implementation of the change management program for the new business model
 - Conducting and supervising research (at least 30 MBA & MBL students) and 2 DBL students
 - Developing teaching modules and teaching MBA & MBL students

2. VODACOM GROUP LIMITED 2004-2013

2.1 Position:

Group Executive, AML, Ethics and Compliance & Money Laundering Control Officer (MLCO): Vodacom Group Limited & Nedbank Mobile Money

2.2 Areas of responsibility at Vodacom

- i. Compliance: Anti-corruption, anti-Money Laundering and anti-terrorism : Vodacom SA and Vodacom Mozambique
- ii. Ethics and Governance Development: Vodacom SA, Mozambique, DRC, Tanzania, Lesotho
- iii. Vodacom Financial Services: Anti-money laundering control, combating of terrorism and sanctions compliance, Vodacom SA and Vodacom Tanzania
- iv. General Legal Compliance and Code of Conduct Compliance

2.3 ROLE IN FINANCIAL SERVICES: ANTI-MONEY LAUNDERING& COMBATTING OF TERRORISM

In 2010, Vodacom SA and Nedbank jointly launched the Vodacom & Nedbank Mobile Money (M-pesa) in SA.

Both companies appointed me to set up and manage a risk based AML CFT and sanctions compliance function for this financial product and to attend to related regulatory matters.

This would be my fourth start up in Vodacom (the others being Ethics & Governance Development in Vodacom Group, Anti-corruption in Vodacom SA and Anti-money laundering in Vodacom Tanzania))

a) **Build activities : work undertaken to set up the department**

For purpose of setting up and building the Mobile Money AML/CFT function, I conducted the following by means of a project:

l) **The initial research and creation of a body of knowledge to ensure understanding of:**

- The product / service - What the product/service is/how it works
- Typologies – i.e. trends on how the product or service has been abused for ML and TF purposes
- Vulnerabilities – What it is about the service or product that could / is known to make it susceptible to ML and Terrorist financing
- The relevant regulatory regime: Policy, applicable hard and soft laws
- Comparative approaches to the regulation of Mobile and issues / challenges

- This informed a strategic vision & what the areas of regulatory engagement should be to align the product with business requirements

II) **Country (local environment) risk assessments and established the country risk profile.**

I conducted initial country risk assessments. The country risk profile informed the design of AML/CFT controls and programme.

III) **Company AML/CFT risk assessments**

I conducted company risk assessments. Among others, this entailed analysing various business units and business processes in order to determine where the AML /CFT risk areas are, where various AML controls would ideally be implemented, how the business processes would have to be adapted to integrate AML/CFT controls and who was to be consulted (stakeholders) and implement the controls

iv) **Formulation of the company AML/CFT risk management strategy and project plan for implementing it**

I formulated a risk based AML/CFT risk management strategy and defined its key components

v) **Stakeholder relationships and collaboration**

I closely interacted with affected business units and participated in projects as well as with relevant external stakeholders

vi) **People (setting up a team)**

I formulated job profiles and recruited staff whom I would lead and manage to implement the AML program and set up the AML/CFT and Compliance departments.

b) **Ongoing Program maintenance and development : (after set up phase)**

i) I was responsible for leading my team to execute the AML/CFT strategy and in particular, for them to perform the following ongoing activities:

- Conduct ongoing research, risk assessments , update and communicate policies, procedure manuals and related business processes on an on going basis. Train and revise training materials, create awareness and a compliance culture, and provide ongoing business support

ii) **Compliance Monitoring**

- I developed a compliance monitoring manual that was meant to be used for the purpose of checking whether the controls outlined in the procedure manuals are being complied with.

iii) **Reporting**

- I submitted compliance reports to board committees, Vodafone, Nedbank and to relevant business units

- iv) **People** : Lead staff, provide strategic direction, evaluate, mentor and promote their development

Vodacom Tanzania: 2008-2011

I was the Vodacom Group Executive responsible for ensuring that a risk based Anti-money laundering function was set up for the Vodafone Mobile Money (Mpesa) in Tanzania in 2008. In conjunction with the Vodafone Money Laundering Reporting officer and his deputy from whose skills transfer, I benefitted, I provided support and leadership to the local team to ensure that appropriate guidance is provided to the business to ensure that all aspects of the AML and sanctions compliance function are embedded in the business and built into the money transfer product and necessary system developments are made. This was a Group oversight role.

2.4 ANTI-CORRUPTION PROGRAM 2004- 2009 & 2012-2013

In 2004, Vodacom set up the anti-corruption function and department. The anti-corruption program included compliance with the US Foreign Corrupt Practices Act, and later, the UK Anti-bribery Act.

From 2005 to 2006, I was the Executive Head of Department responsible for setting up and implementing the anticorruption function in Vodacom South Africa, and for developing policies for adoption by Vodacom companies outside of South Africa. From 2006 to 2009, I had Group oversight responsibility of this function in Mozambique.

Build Activities for anti-corruption

The activities are conducted to set this up in Vodacom South Africa included the following:

- i) **Body of knowledge/ Topic information**: I built a body of knowledge by conducting research on anti-corruption and starting a library. I also attended FCPA training in order to learn more about the FCPA.
- ii) **Country risk assessments**
- iii) **Company risk assessments**
- iv) **Personnel** : To lead, mentor and develop staff who would implement the anti-corruption strategy
- v) **Anti-corruption risk management strategy**

I implemented an anti-corruption strategy, which had the following components:

- **Statement of values & company rules & guidelines:**
- **Training:**
- **Third Party Due diligences:** I
- **Anti-corruption contract clauses:**

- **Business support: Advice, Authorisations, and approvals**

- vi) **Monitoring:** a separate department conducted anti-corruption compliance monitoring, audits and reviews.

- (The anti-corruption department is also key in merger and acquisitions processes. I did not get involved in these).

The anti-corruption program was values driven. Consequently, I implemented it in conjunction with the ethics program, which was also a start up program in Vodacom in 2005.

2.5 ETHICS (CALLED ETHICS ALONG THE WAY)

2006-2010

I assisted the Chief Officer to set up the Ethics function in Vodacom Group.

i) Company Risk Assessments: The Chief Officer retained external consultants to assist by conducting company ethics risk assessments in SA and in non SA operations.

Based on the key findings of the risk assessments and recommendations, I drafted an ethics risk management strategy, which was approved by my superior and implemented in SA and in Vodacom's non SA operations.

I was thereafter responsible for the continuous development of the Ethics Strategy and to ensure that it is implemented.

The main components of that strategy were as follows:

ii) Ethics Training and awareness

I managed the person/staff member/s who conducted the training and saw that it was properly organized and performance measured and reported.

I designed ethics awareness campaigns and drafted awareness messages and materials

iii) Creating Ethics Structures: I created Ethics committees in Lesotho, Tanzania, Mozambique, the DRC and South Africa and oversaw the implementation of the Ethics function in those countries. I developed an initial ethics committee action plan in these countries in consultation with local teams in order to ensure that they would be in a position to localize and completely own their committees following a period of mentoring and support.

iv) Value statements: The Ethics Department created awareness the company's value statements, endeavored to institutionalize them

v) Codes, Policies and Procedures & systems: I contributed towards the review of the Code of Ethics. I formulated the Gifts and Hospitality Policy and Procedure and related policies such as the anti-corruption policies and provided guidelines on conflict of interest matters, recorded declarations Of Interests by general staff (not board members)

vi) Ethics Advice: I institutionalized the provision of Ethics advice. The provision of ethics advice became one of the main activities of the Ethics and Governance Department. I provided Ethics advice and reviewed ethics advice provided people in the Ethics Department.

2.5 GENERAL LEGAL COMPLIANCE AND CODE OF CONDUCT COMPLIANCE 2012-2013

In 2012, my responsibilities were increased to include general legal Compliance and Code of Conduct Compliance. The latter is a Vodafone document, which is applied in its subsidiaries in accordance with a methodology prescribed by Vodafone.

The General Legal compliance function had been set up two years previously and in 2012, I managed the Executive who implemented the function and new strategy which incorporated Vodafone requirements.

3. UTHINGO MANAGEMENT (PTY) LTD. (The First National Lottery Operator in SA) 2001-2004.

Position held: Head of Compliance: 2001-2004

My key responsibilities included the following:

i) Ensuring compliance with the law and with the license se to operate

- Ensuring that all market related company activities are in line with license requirements and applicable lottery legislation. This included, establishing compliance management systems, developing and implementing an annual compliance strategy and program with a view to manage the risk of license breach and aligning the compliance function to the company strategy & vision;

ii) Relationship with the regulator

- To develop and promote an effective relationship with the regulator;
- To assist the CEO and COO by ensuring that regulatory requirements, that had been agreed to are well documented and executed;
- I was responsible for the preparation and submission of daily, weekly and monthly reposts to the regulator and for reporting internally on compliance

iii) Compliance support: Advisory role

- To provide compliance support to departments and embed the culture of compliance through various activities including training, providing advice relating to relevant legislation and the operating license, procedural & process guidelines.
- Advise whether projects and systems are consistent with regulatory requirements and mentoring staff to develop expertise to provide advice to the business
- Improve compliance awareness and education by developing an awareness and training strategy and overseeing its implementation,
- Put in place a system of monitoring compliance and plan and oversee implementation by staff

iv) Coordination of compliance related functions

- I coordinated all company compliance activities in line with the National Lottery License and applicable legislation
- I developed and implemented a compliance monitoring strategy and liaised with internal Audit department
- I developed and implemented compliance tracking schedules for the team to follow up on areas on non compliance and to ensure that corrective action is taken.

I participated in business projects in order to ensure that controls are embedded in the business and that the team understands the business

4. NATIONAL UNIVERSITY OF LESOTHO**1986-2001****Lecturer in Law,**

1986 – 2000

I lectured in contract law, company law and partnerships, introduction to law and international organisations.

University Administration

Faculty Tutor

1988- 1990

Head of Public Law Department

1990-1992

Deputy Dean of the Faculty of Law

1998 - 2001

Acting Dean of the Faculty of (acted at various times as Dean of the faculty of Law)

I also participated in various university decision making bodies, including university Senate)

Research activities

SN Monyamane: The Place of Corporate Social Responsibility in Company Law and Governance 2000

(Ph.D Thesis)

SN Monyamane, "The Company Law of Lesotho" In G.W.L.K Kazosi (ed) Introduction to the Law of Lesotho: Basic Texts on Law and Aspects of Judicial Conduct and Human Rights: Lesotho, Morija, 1999)

SN Monyamane, "Laws affecting the status of women in Lesotho" In Women, Law and Development in Africa: Issues and Strategies for Change (OEF International Washington DC, 1990) p.98

SN Monyamane, The Law Relating to Maintenance in Lesotho" : A Pilot Study report on maintenance Law in Southern Africa (Southern Africa Research Project: Harare (1990)p.20

S.N Monyamane: "Some problems in The Economic Law and Cooperation in Eastern and Southern Africa" In Institute of Southern African Studies, Proceedings of the Workshop of Southern African Development Research Association (SADRA) Congress and Conference on regional Economic Integration in Southern Africa: 1988

SN Monyamane: A Comparative Study of the Preferential Trade Agreement of Southern and Eastern African States and ASEAN , 1984 (LLM thesis)

5. UNIVERSITY OF TASMANIA

1984- 1985

Law Faculty Tutor (junior starting position) teaching property law and Introduction to law

6. BOARD MEMBERSHIPS**Non Executive Director, The Central Bank of Lesotho**

1998- 2001

I was appointed as a non executive director in terms of the Lesotho Central Bank Act and also as a Board Committee member.

I performed usual directorship functions, including the following highlights:

I participated in the review of Financial Institutions Act and the Central Bank Act (as part of the financial institutions review and reform process.

Non Executive Director and Member of the Audit Committee: Vodacom Lesotho (Pty) Ltd 2000- 2003

With Standard Bank Lesotho, in respect of an under writing agreement for the purchase of equity stake form the Privatization Unit

Skills

I have a strong academic foundation and thus, good research, analytic, writing and lecturing skills.

I am a strategic thinker with a proven track record in providing leadership and hands on experience, in setting up, building and maintaining sustainable legal compliance & Ethics programs.

I am adept at understanding business & business organization:

I developed and implemented due diligence, risk assessments, risk mitigation strategies to ensure that companies' market related activities comply with legal and regulatory requirements and compliance risks managed

I have a good track record in translating legal and regulatory requirements into product and business rules, procedures and business processes,

I have thus lead teams and provided strategic direction to embed compliance and ethics in the business and influence organizational culture. The ethics and compliance programs that I have set up have been sustainable and grown.

Although based in Johannesburg, South Africa, I have had oversight responsibilities in different countries in Southern and Eastern Africa.

While I am a highly adaptable professionally, I am especially an asset in the area of managing financial crime having set up relevant functions or programs and translated them into business processes and systems

- I set up the Vodacom SA anti-corruption compliance program within Vodacom's SA operation and am familiar with the US Foreign Practices Act & UK Anti-bribery Act and their impact on companies operating in SA.
 - I provided leadership to set up ethics programs for Vodacom Group in the DRC, Lesotho, Tanzania, Mozambique and South Africa.
 - My compliance expertise is primarily in anti-money laundering, Sanctions Compliance, anti-corruption & anti-bribery, and ethics
- I have served as a Money Laundering Control Officer for Vodacom Group's mobile money program (Mpesa) in Tanzania and South Africa and provided assistance to Vodacom Lesotho, DRC and Mozambique. In SA, my role with regard to Mobile money included maintaining good relationships with relevant internal and external stakeholders.
- I have also had experience in managing a relationship with regulators, which was my key responsibility at Uthingo.

Importantly, my responsibilities have always required me to exercise powers of persuasion, listening skills and collaboration with various stakeholders, and where necessary, assertiveness, as I have always had to introduce new ways of doing things. Without these skills, departmental goals and the company's ethics and compliance strategies could not be achieved.