CRAWFORD CAPITAL
Solutions for Tomorrow
Address: Koita Complex, P.O BOX Private,
Ministries road, Juba, RSS
Company Registration Number: 31932

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FOR IMMEDIATE RELEASE

CRAWFORD CAPITAL LTD RESPONDS TO ALLEGATIONS ON DIGITAL GOVERNMENT SERVICES IN SOUTH SUDAN

Crawford did not retain Government revenue; digitalisation delivered a reported 4,200%+ rise in monthly collections

Crawford Capital Ltd is responding to recent public allegations concerning its role in the digitalisation of Government services and revenue collection in South Sudan, including claims relating to revenue diversion, service fees, trust accounts and procurement. Crawford disputes these allegations and sets out the following facts, which are verifiable through the applicable contracts, account records and remittance data.

Crawford is a technology and software engineering company that builds, operates and maintains digital platforms at the request of Government institutions, under Government-directed mandates and within agreed contracts. It does not set taxes, allocate budgets, or exercise the statutory powers of Government institutions.

Key Facts

- **Revenue impact:** publicly reported SSRA figures show monthly non-oil revenue collections rose from approximately US$648,000 to approximately US$28 million between 2020 and 2025, an increase of about 4,221% (USD terms) / 4,233% (SSP terms).

- **Value for money:** Crawford's 2% platform service fee — covering system maintenance, security and reconciliation — should be weighed against that reported revenue gain and against the leakage, delay and under-collection typical of manual systems.

- **Government revenue:** Crawford did not retain Government revenue. A 75% (Crawford) / 25% (Ministry) split applied only to a separate US$15 convenience fee charged on selected digitised services such as eVisa — not to the underlying Government fee, tax or revenue collected.

- **Trust accounts:** the private-account allegation mischaracterises regulated trust or collection accounts. The Electronic Money Regulation,section 14, 2017 recognises trust accounts as pooled commercial-bank accounts held by a provider as trustee for users, subject to trust-account agreements, reconciliation, audit and Bank of South Sudan reporting.

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Background

On 19 November 2019, Crawford signed an agreement with the Ministry of ICT and Postal Services to digitalise selected Government services as a public-private partnership. In November 2020, it signed a separate agreement with the National Revenue Authority (now the South Sudan Revenue Authority) to digitalise non-oil revenue collection, for which Crawford earns a 2% platform service fee — a distinct arrangement from the convenience-fee model, and broader in scope than an ordinary bank collection fee.

Crawford's use of established technology platforms, adapted to South Sudan's legal and operational requirements, reflects standard industry practice. The World Bank's Digital Economy Assessment for South Sudan separately estimated that the move to digital systems roughly tripled Government revenue collection.

The 75/25 Split, Explained

The claim that Crawford retained 75% of Government revenue is incorrect. Government fees, taxes and charges remained payable to the relevant Ministry under applicable law.

The 75/25 split applied only to the US$15 eVisa convenience fee: Crawford's 75% covered platform development, operations, cybersecurity and user support, while the Ministry's 25% supported institutional coordination and programme oversight.

Government revenue and the convenience fee are two separate flows; presenting the split as a share of Government revenue misstates the arrangement.

Trust Accounts, Not Private Operating Accounts

The allegation that collections were held in Crawford's private accounts misstates the legal and operational structure. The relevant accounts were trust or collection accounts used to receive, reconcile and remit electronic payments, not ordinary private operating accounts of Crawford.

South Sudan's Electronic Money Regulation, 2017 directly supports this distinction. It defines a "Trust Account" as a pooled account held in a commercial bank in the name of the e-money service provider as trustee on behalf of customers, and a "Trust Account Agreement" as the legal agreement governing management of that account. Regulation 14 requires such accounts to be maintained with a commercial bank, governed by a trust-account agreement, reconciled at least daily, audited annually, and subject to Bank of South Sudan reporting. It also requires funds in the trust account to equal the e-money issued and to be used for the sole benefit of users.

Accordingly, the existence of a trust or collection account is not evidence of diversion. The proper basis for verification is the applicable account mandate, bank records, system records, remittance schedules and reconciliation data. Questions over exchange-rate movements fall outside Crawford's purview and are matters of fiscal and monetary policy for the relevant public authorities.

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Procurement Is a Government Function

Procurement approval is a statutory Government function carried out under the Public Procurement and Disposal of Assets Act, 2018. Crawford responded to a Government requirement and delivered contracted services after the relevant Government approvals were granted; it did not constitute the procurement committee or exercise the authority of the procuring entity.

Crawford invested in South Sudan when the country was widely regarded as high-risk, and its performance should be assessed on the basis of law, contract and verifiable delivery.

A Technology Provider, Not a Spending Agency

Crawford does not allocate, budget, or spend public funds, set Government taxes or fees, or approve Government procurement. All revenue collected through its platforms belongs to, and is managed by, the Government of South Sudan in accordance with applicable law.

Crawford remains committed to lawful digital transformation and continued support for South Sudan's digital Government agenda, and welcomes scrutiny based on verifiable contracts and records.

"Crawford's role is clear: we provide technology that helps Government institutions deliver services and collect revenue more transparently. Government revenue remains Government revenue, and Crawford is paid only under its contractual arrangements. The facts are verifiable from the agreements, system records and payment records."

— Company CEO, Crawford Capital Ltd

Media Contact
Crawford Capital Ltd
Software Engineering & Digital Transformation Solutions
Koita Complex, Juba, Republic of South Sudan
Telephone: +211 922 288 886
Email: info@crawfordcapital.africa
Website: www.crawfordcapital.africa

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