



Technical Due Diligence Review

Independent Assessment of Platform Status
and Development Approach

Executive Summary

The platform rebuild does not address InvestRand's core business needs.

Technology investment is focused on infrastructure while business-critical functions remain incomplete.

Key Findings

1

Progress concentrated in infrastructure

Frontend 80%, Backend 75% — but Financial Calculations 35%,
CRM Integration 0%. (Source: Develutions status report, 27 Dec 2025)

2

Business-critical functions deprioritised

Lead capture, deal facilitation, and fee collection are either
"future" features or explicitly out of scope.

3

Full migration carries significant risk

Complete rebuild of business logic, testing, integrations.
Alternative approaches (Vue 2→3) not fully explored.

4

Regulatory questions require attention

5% sourcing fee structure may require PPRA registration.
Financial projections may trigger FAIS requirements.

Recommendation

Before proceeding with any development path:

- Verify Develutions' claimed progress (code access or demonstration)
- Confirm regulatory compliance status
- Define what technology must deliver for the business to scale

Scope and Approach

What we were asked to do and how we conducted this review

Questions to Answer

- 1 Is the full code migration technically sound and necessary?
- 2 Is the pricing reasonable relative to scope?
- 3 Can we create a standardised brief to compare vendors?

Source: Ezra Rasethe email, 8 December 2025

Review Activities

Activity	Method
Document analysis	Specifications, emails, status reports
Platform testing	Browser testing as investor user
Business model research	Website, Disrupt Africa, competitors
Progress assessment	Develutions' self-reported status
Testing date: 17 January 2026	

Limitations of This Review

No access to Develutions' code

We cannot verify their claimed progress — we can only analyse their self-reported status. Many claimed bug fixes require admin credentials to verify.

No admin portal access

Regulatory status unverified

PPRA and FSCA registration requires direct verification.

Implication:

Findings are based on available evidence. Claimed progress should be verified before decisions are made.

Documents Reviewed

Requirements Specification (80 pages) • Business Rules Specification (50 pages) • Email correspondence (Nov-Dec 2025) • Project Status Report (27 Dec 2025)

Understanding the Business Model

What InvestRand actually is — based on evidence

Key Finding: InvestRand is a property sourcing marketplace, not a fractional investment platform.

Source: investrand.co.za — "With investRand, you get full ownership of your property—no fractional investments, no hidden costs."

This Distinction Matters

Aspect	Fractional Platform (e.g, EasyProperties)	InvestRand (Actual Model)
Ownership	Fractional shares in SPV	Full property ownership
Minimum investment	As low as R1	Full property deposit/bond
Revenue model	Management fees on pooled funds	5% sourcing fee per transaction
Regulatory framework	FSP license, CISCA registration	Potentially PPRA, possibly FAIS

Stated Business Metrics

(Source: Disrupt Africa, 26 March 2024)

1,000+

Users

60%

Repeat customers

R1M+

First year revenue

33

Median customer age

~50%

First-time investors

Profitable

Since inception, bootstrapped

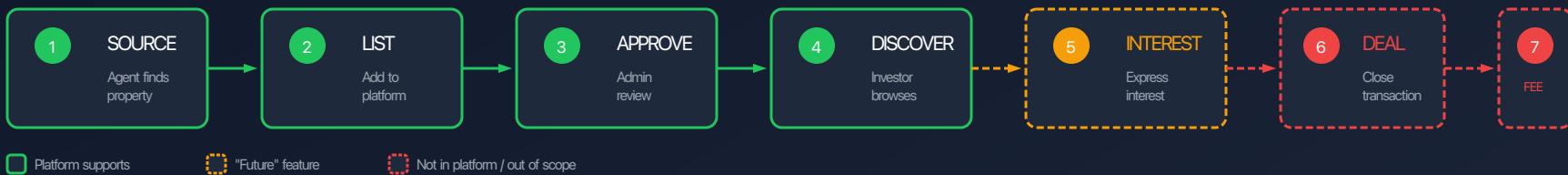
Revenue Model: 5% sourcing fee (minimum R30,000) per property transaction

Example: R2,000,000 property → R100,000 sourcing fee to InvestRand

Business Process and Technology Coverage

Where technology supports the business — and where it does not

The InvestRand Business Process



Technology Coverage by Business Step

Step	Current Platform	Devolutions Progress	Source
1-3. Source → List → Approve	Green circle: Working	85% Property Display	Devolutions status, 27 Dec
4. Discover (with calculations)	Yellow circle: Bugs reported (ROI, bond)	35% Financial Calculations	Devolutions status, 27 Dec
5. Express Interest	Yellow circle: "Future" feature	Not in scope	Requirements Spec
Lead Management (CRM)	Red circle: Broken (ActiveCampaign sync)	0% CRM Integrations	Devolutions status, 27 Dec
6. Deal Facilitation	Red circle: Not in platform	Not in scope	Requirements Spec
7. Fee Collection	Red circle: Not in platform	Not in scope	Requirements Spec

Observation: The platform supports property discovery but does not support how InvestRand generates revenue.

Steps 5-7 (Interest → Deal → Fee) are where the business model is executed. These remain gaps.

Develutions Progress Assessment

Based on their self-reported status — Source: Develutions email, 27 December 2025

Claimed Overall Progress:
55-60%

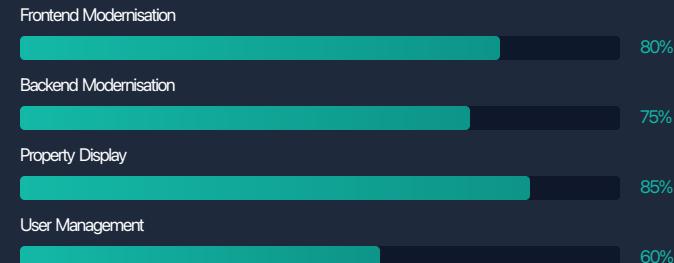
This figure is unverified.

We have not seen the code. This is Develutions' self-assessment.

Recommendation: Request code access or demonstration before accepting this claim.

Progress Breakdown (from Develutions' Report)

Infrastructure (High Progress)



Business Functions (Low/No Progress)



Analysis

The 55-60% overall figure is achieved through strong infrastructure progress.

The functions that directly support revenue generation remain incomplete or out of scope.

Question: How will this rebuild enable InvestRand to scale if the business-critical functions are not addressed?

Regulatory Considerations

Questions to verify before further technology investment

Why This Matters:

Regulatory non-compliance could invalidate the business model regardless of technology quality.

These questions should be addressed before committing to any development path.

PPRA / Property Practitioners

The Question

Is the 5% sourcing fee actually commission on property sales?

Legal Framework

Property Practitioners Act 22 of 2019
Fidelity Fund Certificate (FFC) required for earning commission on property

To Verify

- Is InvestRand PPRA-registered?
- Is Ezra Rastehe registered?
- Are sourcing agents registered?

FSCA / Financial Services

The Question

Is InvestRand providing financial advice?

Platform Activities

Calculates ROI, bond repayments
Presents investment projections
Connects with financing options

Comparator

EasyProperties operates under FSP License 22588
(via First World Trader)

Other Compliance

FICA

Property transactions > R25,000 require KYC/AML compliance

POPIA

Personal data handling
Privacy policy review needed

CISCA

NOT APPLICABLE

Full ownership model = no pooled funds. Different from fractional platforms like EasyProperties.

How Competitors Handle This

EasyProperties (Purple Group)

FSP License 22588 | SPV structure for fractional shares | Different model from InvestRand

Crowdprop

Property crowdfunding model | Regulatory status unclear from public information

Recommendation:

Consult with a compliance attorney to verify regulatory status before any technology investment decision.

Recommendations

Immediate Actions

1 Verify Progress

Request code access or live demonstration from Develutions to verify claimed 55-60% progress

2 Confirm Regulatory Status

Consult compliance attorney on PPRA and FSCA requirements for the sourcing fee model

3 Define Business Requirements

Document the end-to-end investor journey and how technology should support each step

4 Clarify Revenue Flow

How is the 5% fee currently tracked and collected?

Questions for Develutions

- How will this rebuild enable InvestRand to scale to R500M in transactions?
- Where in the architecture is the investment transaction flow?
- Why is financial calculations at 35% when this is the core value proposition?
- Why is CRM integration at 0% when this is how leads are managed?
- Why full migration versus Vue 2 → Vue 3 incremental approach?
- What is the data migration and rollback strategy?

Questions to Consider

- How do investors currently invest? What is the actual process?
- How is the 5% sourcing fee currently collected?
- What specifically prevents scaling today – technology or process?
- Is the problem the technology or the business process?

These questions help determine whether the solution is a technology rebuild or a business process redesign.

Key Insight

The core issue is alignment between technology investment and business needs — not technical modernisation.

Path Forward

Options and considerations for the next steps

Evaluate the Options

Continue with Devolutions

Complete the migration as planned

Before proceeding:

- Verify actual progress (code access)
- Clarify business functionality scope
- Agree timeline to production

Pause and Reassess

Stop development, evaluate alternatives

This allows time to:

- Confirm regulatory compliance
- Define business requirements clearly
- Compare vendor approaches fairly

Change Direction

Different vendor or approach entirely

This requires:

- Clear requirements definition
- Settlement with Devolutions
- Partner focused on business outcomes

What a Business-Focused Approach Would Deliver

Instead of just infrastructure:

- Lead capture that converts interest to deals
- CRM integration that tracks the deal pipeline
- Financial calculations that investors can trust

Enabling business growth:

- Fee collection and revenue tracking
- Proper DevOps and infrastructure
- A path to R500M in transactions — not a rebuilt toy

The Right Question

Not "How do we modernise the technology?" but "How do we enable the business to scale?"