POLICY AND PROCEDURE MANUAL

Table of Contents

1. Introduction
2. History / Company Profile
3. 1 NET BEE Empowered (Pty) Ltd : Policy Statement
4. Code of Conduct
5. Overall Objectives
6. Organisational Structure
7. Policies to various clauses: SANAS R47-02
8. Procedures
9. Records
1. INTRODUCTION

Our organisation uses manuals explaining precisely what is expected from our staff and how it must be done. It consists of procedures, methods and instructions and gives our internal and external personnel specific guidelines as it relates to the execution of their tasks. By using our manuals, productivity, performance and quality assurance can be enhanced. Our personnel members will know exactly what has to be done and where each of them with their specific role and job description fits into our organisation. These manuals also assist our managers, since they do not have to continuously repeat instructions to staff and give information regarding work to be done. Our manuals are used to train new recruits and everyone follows uniform standards.

We follow the principle of Zero-defect: Employees must prevent mistakes, and ensure quality and/or standard of work, by doing the work right the first time. This includes not only the identification and correction of mistakes, but also the motivation of employees to ensure compliance with processes, procedures and directives issued.

Our internal and external personnel members, including management, are expected to follow our policies and procedures contained herein.
2. **HISTORY / COMPANY PROFILE**

Lizette Frank established a Broad-based Black Economic Empowerment Verification Agency, BEE Empowered and Labour Consultancy CC (hereinafter referred to as “BEE Empowered”), in 2005. In June 2016, BEE Empowered underwent a name change and was converted from a closed corporation to a company with limited liability, i.e. 1 NET BEE Empowered (Pty) Ltd. Lizette served on ABVA’S Board of Directors and headed its EXCO Committee responsible for Discipline and Ethics from 2007 to 2010.

Lizette obtained her B.A. LLB degree at the University of Stellenbosch in 1988. She worked as a Public Prosecutor in Grahamstown and Cape Town for a period of three years before joining Silberbauers Attorneys where she completed her articles. She was admitted as an attorney in 1994 and worked as a Professional Assistant in Silberbauers' Labour Department before establishing her own law firm under the name and style of Frank Seton Attorneys in 1995, specializing in Labor Law.
3. **BEE EMPOWERED: POLICY STATEMENT**

**BEE Empowered** is an independent Cape-based verification agency that conducts verifications of small to medium enterprises across all sectors, countrywide.

We strive to meet our clients’ expectations of excellence by providing highly professional services, timely and efficiently, and at competitive market-related fees.

Our relationship with our clients are based on trust and mutual respect.

We have extensive up-to-date knowledge of B-BBEE legislation and the verification processes involved. BEE Empowered currently has two Verification Managers/Technical Signatories (inclusive of Lizette Frank) in its employ.

Our implemented Management System is based on the requirements of SANAS R47-02. We have implemented a Management Review procedure (BEE/MP/12) and an Internal Audit procedure (BEE/MP/10) to ensure that we continue to carry out our verification activities in accordance with our Management System to enable us to continue to achieve our company’s key objectives, i.e. to produce objective, accurate and credible verification results.

We have structures, policies and procedures in place to ensure that all our internal and external verification personnel, are familiar with our processes and procedures, are trained, competent and skilled and impartial towards the measured entity that they are assigned to. We treat our clients’ information with the strictest confidence and have implemented a Control of Records procedure (BEE/MP/7) to ensure that the confidentiality and integrity of our clients’ information is maintained.

**BEE Empowered** is a Level Four Contributor to Broad-based BEE with a 100% BEE Procurement Recognition Level. We support various community projects aimed at the upliftment and empowerment of women and children in rural areas.
4. CODE OF CONDUCT

The Code of Conduct provides a framework for BEE Empowered’s values and ethical standards, and the following principles must be applied in our day-to-day business:

► All decisions and actions must conform and comply with all applicable laws, regulations and our company policies and procedures.

► Business must only be secured for BEE Empowered on the basis of our belief in competitive market systems and the appropriateness of earning profit by providing our clients with efficient service.

► Economic substance alone is not justification for originating a transaction. It must be evaluated in the light of comprehensive knowledge of our client’s business and of the transaction’s purpose.

► All individuals employed, or engaged by BEE Empowered will comply with the following fundamental principles: Integrity, objectivity, professional competence, due care, confidentiality and professional behaviour.

► To adhere to the fundamental principles listed above, our staff will identify possible threats, which may arise and will apply safeguards against possible threats by way of eliminating or reducing the threats to an appropriate level.

► All individuals employed, or engaged by BEE Empowered will be honest, fair and truthful in their professional and business relationships.
Situations where personal interest conflict, or appear to conflict, with the interest of BEE Empowered or its clients, must be avoided.

The result of each action or decision must be fair and even-handed to all parties to the transaction or event, in the short- and long-term.

Each decision or act must be proper, in terms of both our own sense of integrity and the scrutiny of others. It should seem appropriate even if published in a major newspaper.

Human dignity must be respected in all our dealings with others.

Communications must be honest and accurate, and confidentiality must be maintained in all instances, unless the law prescribes otherwise.

Ethical conduct should be recognized and valued by all employees and external personnel of BEE Empowered.

Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will not be associated with information they believe to be false, misleading (by inclusion or omission) or recklessly provided.

Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will not compromise their professional or business judgment because of bias, conflict of interest, or undue influence of others.
Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will maintain their professional knowledge and skill at a level, which ensures that clients receive competent professional services.

Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will act diligently (with due care), i.e. must act carefully, thoroughly and in accordance with the requirements of the BEE assignment;

Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will ensure that those working under his or her authority in a professional capacity, receive appropriate training and supervision.

Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will act diligently in accordance with applicable technical and professional services.

Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will not disclose confidential information acquired as a result of a professional or business relationship, without specific written authority or unless there is a legal or professional duty to do so.

Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will not use confidential information acquired as a result of the professional or business relationship with their Client's to their own advantage or to the advantage of third parties.
Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will maintain confidentiality in a social environment and must be alert to the possibility of unintentionally disclosing confidential information to friends, long-term business associates or a close family member (parent, child or sibling), or an immediate family member (spouse or dependent).

Top Management, managers, internal and external personnel and everyone employed and or engaged by BEE Empowered will ensure that staff reporting to him/her and anyone from whom advice or assistance is obtained in respect of the B-BBEE assignment, will respect the duty of confidentiality. If a relationship between any member of top management, managers, internal and external verification personnel and everyone employed or engaged to act for or on behalf of BEE Empowered verification personnel member and a client or BEE Empowered ends, the duty of confidentiality remains.

Top Management, managers, internal and external personnel and everyone employed and or engaged by BEE Empowered will avoid any action that may bring discredit to the verification profession (acts in a way which negatively affects the good reputation of the verification profession).

Top Management, managers, internal and external personnel and everyone employed and or engaged by BEE Empowered will market and promote themselves in an honest and truthful manner.

Top Management, managers, internal and external personnel and everyone employed and or engaged by BEE Empowered will not provide any other services
that could compromise confidentiality, objectivity, impartiality and/or the integrity of BEE Empowered.

► Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will not allow a consultancy body or a linked organization to state or imply that a BEE Verification would be simpler, faster, or less expensive if BEE Empowered is used.

► Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will not state or imply that BEE verification would be simpler, faster or less expensive if a specific consultancy is used.

► Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will not take part in a verification evaluation if he/she rendered any consulting services for a measured entity within the last two years.

► Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will ensure that related activities of related bodies do not affect the objectivity, confidentiality, impartiality and integrity of BEE Empowered’s activities.

► A verification analyst who is involved with the preparation and reporting of B-BBEE information that may be used by the public or others, both inside and outside the employing organisation, has a responsibility to present such information fairly, honestly and in accordance with the relevant standards, e.g. SANAS R47-02 and dti methodology guidelines.
► The verification analyst has a responsibility to undertake only those tasks for which he or she has the necessary training or expertise. If the verification analyst does not have the necessary expertise he/she has the responsibility to obtain it.

► Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will disclose any direct or indirect interest he/she, or any of his or her close family members, may have in the measured entity to be measured prior to conducting the verification assessment of the measured entity.

► When marketing the services of BEE Empowered, Top Management, managers, internal and external personnel and everyone employed and/or engaged by BEE Empowered will have the responsibility to do so in a manner which does not discredit the verification profession in any way, e.g. advertise in bad taste, make extravagant claims.
5. **OVERALL OBJECTIVES**

- Develop a Strategic Plan for BEE Empowered for 2018 by the end of December 2017
- Appoint a new Audit Committee for BEE Empowered by the end of December 2017
- Develop and implement an Internal Audit Schedule for BEE Empowered for 2018 by the end of December 2017.
6. ORGANISATIONAL STRUCTURE

see BEE/MP/5/A1 and BEE/MP/5/A3 attached hereto.
7. POLICIES TO VARIOUS CLAUSES: SANAS R47-02

Introduction

The overall aim of verifying is to give confidence to all parties that rely upon the verification. The value of verifying is public trust that is achieved by gaining the confidence of all these parties, but not limited to:

(a) the measured entities that are the clients of BEE Verification Agencies;
(b) the customers of the BEE Verified entities;
(c) Government Authorities;
(d) Non-governmental Authorities;
(e) Consumers and members of the public; and
(f) Public entities.

In order for us to gain the confidence of all parties that rely upon the verification conducted by us, we need to adhere to the following principles:

(a) Impartiality;
(b) Competence;
(c) Responsibility;
(d) Openness;
(e) Confidentiality;
(f) Resolution of Complaints;
(g) Quality of Service; and
(h) Integrity.
In order for us to achieve the aforesaid objective we shall implement the following policies and procedures.

7.1 Policy: General Requirements

It is our policy to meet the General Requirements of a BEE Verification agency by inter alia implementing and following our documented General Requirements procedure (BEE/MP/1), Risk Assessment procedure (BEE/MP/1/01), Investment through another equity and or debt instrument procedure (BEE/MP/1/05) and our Responsibility for BEE Verification Decisions procedure (BEE/MP/1/06).

7.2 Policy: Impartiality and Confidentiality

It is our policy to meet the Impartiality and Confidentiality requirements by implementing and following our Safeguarding and Management of Impartiality and Confidentiality procedure (BEE/MP/2) and our Confidentiality procedure (BEE/MP2/02). We will appoint an Audit Committee in accordance with our Audit Committee Charter (BEE/MP/2/A6). We will follow our documented Marketing Guidelines (BEE/MP/2/A7) in all our marketing material. To ensure that our internal and external verification personnel avoid situations, which may compromise their impartiality, our verification personnel shall follow our documented Gifts and Hospitality procedure (BEE/MP2/02) and shall sign a Non-Disclosure Form (BEE/SP/21/A6) and Confidentiality Agreement (BEE/MP/2/A5) prior to commencing employment with BEE Empowered.

7.3 Policy: System Requirements and Management Review

BEE Empowered will document its policies, procedures and instructions to the extent necessary to assure accurate, objective and reliable verifications. Management will review our Management System annually in accordance with our Management Review procedure (BEE/MP/12) and will follow our Internal Audit procedure (BEE/MP10) to ensure that corrective action is taken as soon as they identify
non-conformities or departures from our Management System. By following the aforementioned procedures, Management will ensure that we continue to meet our overall objectives within our organisation. To ensure that our systems meet the system requirements of a BEE Verification agency, we shall implement and follow our documented *System Requirements procedure* (BEE/MP/3).

Management responsible for our System Requirements will follow our documented *Management's Responsibility for the Management System procedure* (BEE/MP/3/01).

We shall follow our documented *Management Review procedure* not only to review our Management System, but also to review information on relevant complaints and appeals from users of our verification services, in accordance with a predetermined schedule.

### 7.4 Policy: Structural Requirements

Our organizational structure will be such as to give confidence in our activities. We will identify our top management who will be responsible for the development of our policies relating to our operations, supervision of the implementation of our policies and procedures, supervision of the finances of our organization, delegation of authorities to committees or individuals, as required to undertake defined activities on our behalf and to provide adequate, qualified resources for our activities.

Our overall structure will be documented, showing the duties, responsibilities and authorities of management and our verification personnel, and members of the Audit Committee (BEE/MP/5/A2). We shall implement formal rules for the appointment, terms of reference and operations of any committees that are involved in the verification process (BEE/MP/2/A6). To ensure that we meet the structural requirements of a BEE Verification agency, we shall implement and follow our documented *Structural Requirements procedure* (BEE/MP/4).
7.5 **Policy: Document Control**

We have implemented a procedure, i.e. *Document Control procedure* (BEE/MP/6) to ensure that all authorised editions of appropriate documents of internal and external origin, are available at all locations where operations are performed, that documents are periodically reviewed, and where necessary, that they are amended and that obsolete documents are promptly removed from all points of issue. This procedure will ensure that all documents that form part of our Management System are current, valid and duly authorized.

7.6 **Policy: Control of Records**

We will implement and maintain a procedure to maintain records on the audit and verification process of all our measured entities, including all entities that submitted requests for verifications, and all entities verified. All internal and external personnel will adhere to our *Control of Records procedure* (BEE/MP/7) to ensure that the confidentiality and integrity of our clients’ information is maintained.

7.7 **Policy: Appeals**

We will implement and maintain an *Appeal Procedure* (BEE/MP/8) for receiving, evaluating and making decisions on appeal. We shall be responsible for all decisions at all levels of the appeal-handling process. All appeals shall be resolved in a timely manner. We shall furnish the applicant with a formal notice at the end of the appeal-handling process. Appeal decisions will be made by an individual not involved in the matter that is the subject of the appeal.

7.8 **Policy: Complaints**

We shall ensure that all types of complaints received from whatever source are recorded, properly investigated and resolved timeously and effectively by following our documented *Complaint procedure* (BEE/MP/9). The person investigating the complaint will be completely independent from the complaint
or the activities surrounding the complaint. Trends on the nature of complaints will be analyzed on a continuous basis and used to improve our Management System, client service, verification activities and processes.

7.9 Policy: Internal Auditing and Corrective Action

We shall implement and maintain an Internal Auditing procedure (BEE/MP/10) that would enable us to periodically, and in accordance with a predetermined schedule and procedure, conduct internal audits of our activities to verify that our operations continue to comply with the requirements of our Management System. Our internal audit programme will address all elements of the verification system/processes, including verification activities. Trained and qualified personnel, who are, whenever resources permit, independent of the activities audited, will carry out such audits.

When audit findings cast doubt on the effectiveness of our operations, we shall take timely corrective action in accordance with our Corrective Action procedure (BEE/MP/11) and will notify our verified clients in writing if investigations show that their verifications have been affected. We shall record the area of activity audited, the audit findings and the corrective actions that arise from them. Where we have implemented corrective action, a follow-up audit shall be carried out to verify and record the implementation of the corrective action implemented.

7.10 Policy: Request for Verification

We shall require a representative of a requesting enterprise to complete a Request for Verification form (BEE/CP/13/A1), furnishing us with sufficient information to inter alia determine whether or not we have the necessary competence, ability and resources to perform the requested verification services.

The determining factor for accepting or rejecting a requesting enterprise’s Request for Verification will be whether or not we have the competence, ability and required resources to perform the verification of the requesting enterprise. To determine whether we have the competence and required resources to verify...
the requesting enterprise, factors such as the location and the number of the requesting enterprise’s operations, the time required to complete the verifications, the number of verification analysts we have available to attend to the verification, and other factors, for example language, safety conditions, threats to impartiality, etc. which may influence the activities of the verification process, shall be considered. Records of our reasons for accepting or rejecting the requesting enterprise’s Request for Verification, will be maintained.

7.11 Policy: Information on the Verification Process

The Administration Manager will furnish the Measured Entity with a copy of our Verification Agreement (BEE/CP/13/A2) prior to the commencement of the Measured Entity’s verification. The Verification Agreement contains sufficient information regarding the requirements for a BEE Verification, their rights and obligations in respect thereof, the rights and obligations regarding their use of their verified status in communications of any kind, information about our fees, the process involved in obtaining a BEE Verification, as well as information on the procedure for handling complaints and appeals.

By providing our clients with the aforementioned information, we shall ensure that there exists no misunderstanding between us and the said Measured Entity and that both parties are fully aware of their rights and obligations in the BEE Verification to be carried out.

7.12 Policy: Verification Preparation

When preparing to conduct a verification, we shall follow our documented Verification Preparation procedure (BEE/CP/14): We shall ensure that we have a process for selecting and appointing a Verification Team (consisting of a Verification Manager, Senior Verification Analyst, Junior Verification Analyst or a Verification Analyst Assistant), that is competent after having taken into account the objectives of the verification that needs to be met. The Verification Team will be impartial and objective at all times.
The Measured Entity will be verified in accordance with a Verification Plan (BEE/CP/14/A1). The Verification Plan will be communicated and the dates of the verification will be agreed upon with the Measured Entity prior to the on-site verification. On-site verification procedures will be documented in the On-site Verification Report (BEE/CP/16/A1).

7.13 Policy: Verification Methodology

We shall verify, evaluate and validate information obtained from the Measured Entity based on the principles of the B-BBEE Codes of Good Practice, issued under Section 9(1) of the Broad-based Black Economic Empowerment Act, 2003 (Act 53 of 2003) and will include all relevant elements of the broad-based BEE Scorecard when following our documented Verification Methodology procedure (BEE/CP/15).

All information will be based on information that has been verified by an on-site verification to the location of the Measured Entity in order to reach an opinion on the BEE Status of the Measured Entity.

7.14 Policy: Verification

We shall follow our documented Verification procedure (BEE/CP/16) when conducting verifications. The Verification Team appointed by BEE Empowered will carry out verifications in accordance with a Verification Plan at the site(s) of the Measured Entity. The purpose of such verification shall be to gather evidence to measure the Measured Entity’s B-BBEE rating or status. The Verification Team will verify a sufficient number of examples of the activities of the Measured Entity in relation to the B-BBEE criteria to arrive at a sound appraisal of the Measured Entity’s B-BBEE status.
As part of the verification process, the Verification Team will interview a sufficient number of staff, including top management and operational personnel of the Measured Entity, to provide assurance that the information gathered is sound.

The Measured Entity will receive a copy of our On-Site Verification Report (BEE/CP/16/A1) after the Verification Team has analysed all the information and verified the information gathered, five days after having requested a copy of the said report. We shall retain ownership of the On-Site Verification Report.

7.15 **Policy: Verification Decisions**

We shall follow our documented *Verification Decisions procedure* (BEE/CP/17) when making or withdrawing verification decisions.

7.16 **Policy: Verification Certificates**

**BEE Empowered** will provide to its Measured Entities/ Clients, by any means it chooses, a B-BBEE Verification Certificate (BEE/CP/18/A1) that will identify the name and identifiable physical location(s) of the Measured Entity, the company registration number, the company’s VAT registration number, the dates of granting of the B-BBEE score and the period of validity, the expiry date of the Verification Certificate, the unique reference, the standard and/or normative document, including the issue and/or revision used to evaluate the Measured Entity, our name and or mark and/or logo, the Broad-based BEE Status level, the SANAS logo, the overall B-BBEE Procurement Recognition level of the Measured Enterprise, the B-BBEE Status level of each of the seven elements, the percentage Black Ownership, the percentage Black Women Ownership and whether or not the Measured Entity is an Empowering Supplier or not. We shall ensure that the effective date of the Verification Certificate shall not be a date before the B-BBEE Score was decided.

Only B-BBEE Verification Certificates issued with the original signature of the Verification Manager who issued the said B-BBEE Verification Certificate will be valid.
7.17 Policy: Personnel Competency

We shall follow our Competence, Awareness and Training procedure (BEE/SP/20) to ensure that all internal and external staff members, as well as external verification analysts and experts utilized from time to time, have access to up-to-date knowledge relevant to B-BBEE criteria.

We shall determine the competence required (including experience and level of training), and where applicable, we shall determine any other qualification requirements for demonstrating competence prior to authorization to carry out specific functions. In determining the competence requirements of our verification personnel, we shall address the functions undertaken by Management and the administrative personnel in addition to the functions of those who perform evaluations and verification functions directly.

We shall have access to the necessary expertise for advice on matters relating to B-BBEE verifications. Such advice may be provided by internal and external experts.

7.18 Policy: Personnel involved in the Verification Process

BEE Empowered will, irrespective of the use made of external or temporary resources, have, as part of its own enterprise, personnel having competence to manage the B-BBEE verification process. We shall employ or have access to a sufficient number of competent verification analysts and verification managers. All internal and external verification personnel shall receive clear instructions concerning their duties, responsibilities and authority. We shall follow our documented Personnel involved in the Verification Process procedure (BEE/SP/21) to ensure that we have sufficient competent verification analysts available.
7.19 **Policy: External Verification Analysts**

We shall follow our documented *External Verification Analysts procedure* (BEE/SP/22) when making use of external verification analysts.

7.20 **Policy: Personnel Records**

We shall follow our documented *Personnel Records procedure* (BEE/SP/23) to develop, implement and maintain a procedure to maintain records of the relevant qualifications, training experience and competence of each person involved in the verification process. We shall furthermore maintain up-to-date records of the affiliations and professional status of all external verification analysts and external experts.

7.21 **Policy: Outsourcing**

It is our policy to outsource only certain verification activities, including, but not limited to pre-on-site verifications, on-site verifications, the completion of the on-site verification report and the completion of interview reports by utilizing the services of external verification analysts in accordance with BEE/SP/22. BEE Empowered will, however, not outsource the responsibility for BEE verification decisions; the granting of the B-BBEE Verification decisions, as well as the withdrawal of the B-BBEE verification decisions in circumstances where Measured Entities make incorrect or misleading statements regarding their B-BBEE Score or where Measured Entity use its verification status in such a manner that would result in us losing public interest or that would bring our company into disrepute.

7.22 **Policy: Special Evaluations**

**BEE Empowered** will conduct evaluations of entities at short notice in order to investigate complaints or in response to changes in accordance with our documented *Special Evaluations procedure* (BEE/SP/25). In such instances, we shall describe and make known in advance the conditions under
which these short-notice visits are to be conducted and shall ensure that the verification personnel are competent as the Measured Entity to be evaluated shall not have an opportunity to object to the verification team.

7.23 Policy: Disclosable Information

We shall follow our documented Disclosable Information procedure (BEE/SP/26) if and when required to disclose non-confidential or non-proprietary information. We shall maintain and provide, upon request, information about our activities to SANAS. The information we provide to any verified Measured Entity or to the marketplace, including advertising, shall be accurate and not misleading.

On request from SANAS, and/or the Measured Entity we shall provide means to confirm the validity of a given B-BBEE Score. We shall maintain and make available to the dti a current directory of valid Verification Certificates which will show the name and identifiable physical location(s) of the Measured Entity, the company registration number and VAT registration number of the Measured Entity, the dates of granting of the B-BBEE verification score and the period of validity, the expiry date of the B-BBEE Verification Certificate, the unique reference number, the standard and/or normative document, including the issue and/or revision used to evaluate the client, our name and/or mark and or logo, the Broad-based BEE Status level, the SANAS logo, the overall B-BBEE Procurement Recognition level of the Measured Entity, the B-BBEE Status level of each of the seven / five elements, the percentage Black Ownership, the percentage Black Women Ownership and whether or not the Measured Entity is an Empowering Supplier.

7.24 Policy: Reference to Verification and Use of our Mark and or Logo

We shall allow our Measured Entities in terms of our Reference to Verification and Use of our Mark and/or Logo procedure (BEE/SP/27) to use our authorised mark “roundel”, provided such measured entities conform to our requirements when making reference to its verification status in communication media such as the internet, documents, brochures and/or advertising.