



BEE EMPOWERED

BEE RATING AGENCY

POLICY MANUAL	Doc Ref No: BEE/PM/BEE EMPOWERED
Title: BEE Empowered and Labour Consultancy CC	Revision No: 02
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC 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, at competitive market related fees.

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

We have extensive up to date knowledge of BEE legislation and the verification processes involved.

Our implemented management system is based on the requirements of SANAS 47-01. We have implemented a Management Review procedure and an Internal Audit procedure to ensure that we continue to carry out our 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 entity that they are assigned to. We treat our clients' information with the strictest confidence and have implemented a Control of Records procedure to ensure that the confidentiality and integrity of our clients' information is maintained.

BEE Empowered and Labour Consultancy CC 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.

BEE Empowered and Labour Consultancy CC is a full member of the Association of Verification Agencies and Lizette Frank, our managing member, is a director on ABVA'S Board of Directors.



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B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/28
Title: Code of Conduct	Revision No: 01
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OUR CODE OF CONDUCT

The Code of Conduct provides a framework for **BEE Empowered and Labour Consultancy CC's** values and ethical standards. The following principles must be applied in our day-to-day business:

- ▶ All decisions and actions must conform with all applicable laws, regulations and Corporate policies.
- ▶ 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 customers 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.
- ▶ Commercial, financial and other pressures shall not compromise our impartiality.
- ▶ Individuals must be honest and trustworthy in all actions and relationships for, on behalf of **BEE Empowered**.
- ▶ 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. Confidentiality must be maintained where appropriate.
- ▶ Ethical conduct should be recognised and valued by all employees and external personnel of **BEE Empowered**.



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POLICY MANUAL	Doc Ref No: BEE/PM/1
Title: General Requirements	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC, shall display internally a positive commitment to all seven elements of the relevant indicators of the broad-based BEE scorecard as contained in the BB-BEE Codes of Good Practice, issued under section 9(1) of the Broad-based Black Economic Empowerment Act, 2003. We shall endeavour to meet the current compliance targets pertaining to all seven elements of the aforementioned scorecard. We shall furthermore endeavour to meet the general requirements of a verification agency as set out in SANAS 47-01, clause 11.

We shall be seen as being both factual and perceptually independent from our verified entities, and shall avoid any circumstances that give rise to, or may potentially give rise to, a conflict of interest between various entities. Should such a circumstance arise, we shall disclose the full nature of the conflict of interest to all parties concerned and no verification shall be done. The entity will have to obtain the services of another verification agency under such circumstances.

BEE Empowered and Labour Consultancy CC is a close corporation duly incorporated in accordance with the company laws of the Republic of South Africa.

Our members shall not hold an equity share, or have any voting rights, in an entity to be rated. Members may however have a minority interest or listed share/s where the total shareholding does not constitute a substantial shareholding when compared with the total number of shares issued by the enterprise. The materiality of such a financial interest shall be evaluated to ensure that our independence is not impaired. We shall disclose to **the dti** in accordance with sound corporate governance principles any material financial interest that we may have in an enterprise to be verified.

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Title: General Requirements	Revision No: 01
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We shall not enter into a debt-creating agreement with a prospective client if such an agreement factually encumbers, or is perceived to encumber us in the execution of our professional discretion and objectivities towards the BB-BEE assessment of the said client, unless it is the normal business for the said client to provide such services and it is entered into under conditions not more favourable than those provided to the general public at large.

Our clients shall be required to enter into a legally enforceable Verification Agreement with us, prior to us conducting the client's verification. The rights and obligations of both parties shall be clearly defined in the aforementioned Verification Agreement. We shall retain authority and shall be responsible for our decisions relating to the BEE Verification.

We acknowledge that significant financial risks could arise from our verification activities. We therefore intend to make arrangements to adequately cover our liabilities arising from our operations in each of the geographic areas in which we operate within a month after being accredited. In determining the amount of liability cover to arrange, we shall evaluate our finances and resources of income at the time to be able to demonstrate that commercial, financial or other pressures do not compromise our impartiality.



POLICY MANUAL	Doc Ref No: BEE/PM/2
Title: Impartiality Requirements	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall be committed to and shall demonstrate its commitment to impartiality in our BEE verification activities, especially through our top management structures. We understand the importance of impartiality when managing conflicts of interest as it ensures our objectivity when carrying out our BEE verification activities.

To ensure that there is no conflict of interests, internal and external personnel (including those acting in a managerial capacity) shall not be employed to take part in a verification evaluation or in the verification process if they have been involved in BEE consultancy to the measured entity within the last two years.

We shall identify, analyse and document the possibilities for conflict of interest arising from the provision of our services, including any conflicts arising from our relationships. If any relationship poses a risk to our impartiality, we shall document how we have (or intended to) eliminated or minimized such a risk to an acceptable level. Should we not be able to eliminate or minimize such risk, we shall terminate the relationship. If a member of our verification team, or an immediate family member, has a direct financial interest, or a material indirect financial interest, in a client, the said member will be requested to dispose of the direct financial interest prior to becoming a member of the verification team, or to dispose of the indirect financial interest in total, or to dispose of a sufficient amount of it so that the remaining interest is no longer material, prior to the individual becoming a member of our verification team, or we shall remove the individual from the verification engagement. We shall require our personnel to declare and disclose any prior association with any enterprise they may be assign to evaluate.

We shall ensure that the activities of other related bodies do not affect the confidentiality, objectivity and impartiality of our activities. We shall avoid any situation where the activities of another body could create a conflict of interest.



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We shall implement measures to prevent a consultancy body from stating or implying that a BEE verification will be simpler, faster or less expensive if a specified BEE Verification Agency is used. Similarly, we shall not state or imply that the BEE verification will be simpler, faster or less expensive if a specified consultancy body is used.

We shall **not** provide any other services, which could compromise the confidentiality, objectivity and impartiality of our verification activities.

We shall implement and maintain procedures and structures whereby the composition, terms of reference, duties, authorities and responsibilities of any committee involved in the verification process shall be documented and authorised by our top management to ensure representation of a balance of interest such that no single interest predominates, and that such committees shall have access to all the information necessary to enable it to fulfill its functions.

All our verification personnel, internally and externally, as well as committees that could influence the verification activities, shall act impartially and shall not allow commercial, financial or other pressures to compromise their impartiality.

The Administrative Manager shall ensure that a copy of this policy is placed on our website.



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B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/3
Title: Confidentiality Requirements	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC has implement the Control of Records procedures to ensure the confidentiality and integrity of our clients' information, obtained or created during the performance of verification activities, at all levels of our structure, including verification committees and external bodies or individuals acting on our behalf. We have furthermore entered into legally enforceable agreements with our internal and external verification personnel, including internal and external committees and bodies, to ensure that the confidentiality and integrity of our clients' aforementioned information is maintained.

BEE Empowered and Labour Consultancy CC shall inform the verified enterprises, in advance, of the information it intends to place in the public domain. All other information, save for information that is made publicly available by the client, shall be considered proprietary information and shall be regarded as confidential. Information about a particular client, or individual, shall not be disclosed to any third party without the written consent of that particular client, or individual, concerned. Should we be required by law to release confidential information to a third party, we shall notify the verified enterprise or the individual concerned, unless prohibited by law, in advance of the information provided. Information about the verified enterprise from sources other than the verified enterprise itself (e.g. complaints, regulators) shall be treated as confidential.

We shall have available and shall make use of equipment or facilities that ensure the secure handling of confidential information (e.g. documents, records, etc). When confidential information must be made available to other bodies, i.e. SANAS and **the dti**, we shall inform our verified clients of this action.



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POLICY MANUAL	Doc Ref No: BEE/PM/4
Title: Structural Requirements	Revision No: 01
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POLICY STATEMENT

Our organizational structure shall be such as to give confidence in our activities.

We shall identify our top management who shall be responsible for the development of policies relating to our operations, supervision of the implementation of the policies and procedures, supervision of the finances of the body, supervision of the performance of evaluations and verifications, BEE verification decisions, delegation of authority to committees or individuals, as required, to undertake defined activities on our behalf and the provision of adequate, qualified resources for our activities.

Our overall organizational structure shall be documented, showing the duties, responsibilities and authorities of management, other verification personnel and any committees. We shall implement formal rules for the appointment, terms of reference and operations of any committees that are involved in the verification process.



POLICY MANUAL	Doc Ref No: BEE/PM/5
Title: Management System Requirements	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall establish, implement and maintain a management system in accordance with SANAS 47-01, appropriate to the conducting of BB-BEE verifications.

We shall document our policies, procedures and instructions to the extent necessary to assure accurate, objective and reliable verifications. Management shall review our management system at regular intervals to ensure that corrective action is taken as soon as they identify non-conformities or departures from our managements system to enable us to continue to meet our key objectives within our organisation, i.e. to deliver accurate, objective and reliable verifications.

Our Administrative Manager shall be responsible for the process of planning, organizing and controlling all information related-activities within our organisation.

Our Administrative Manager shall be responsible for the effective management of the information of our organisation, in other words, he or she shall determine what information must be provided by whom, when, in what format and to whom, to check whether it has been done, and to give the necessary guidance if the employee involved does not know how to do it.

Our Administrative Manager shall be responsible for the orderly collection, processing and distributing of information to decision-makers and managers within our organisation to enable them to execute their tasks, as well as to role-players outside our organisation.

The Administrative Manager shall register each and every authorised document in the Document Control Distribution List upon implementation before he or she circulates copies of the said document to the relevant person in our organisation. Our personnel (internally and externally) shall be required to sign



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the Document Acknowledgement Sheet to show their acceptance, understanding and commitment to our policies, procedures and instructions as documented.

The Administrative Manager shall be responsible for the safekeeping and updating of the Authorised Documents Master File, External Document Master File and the Obsolete Documents Master File. All internal and external personnel shall have access to the aforementioned Master Files at all times.

We shall provide training to all our internal and external personnel on all our processes, policies and procedures. Employees shall be evaluated to establish if they understood the processes and instructions and if they are competent to carry out our documented procedures, processes and instructions. Further training and guidance shall be provided if, after evaluation, the employee shows a lack of understanding regarding a certain process or procedure.

We shall only allow an employee to carry out an instruction if Management is of the opinion that the employee is competent to carry out the said instruction. Should an employee fail and or refuse to carry out a reasonable instruction, or should an employee fail to follow the correct prescribed procedure as documented, disciplinary action may be instituted against the said employee. The aim of the disciplinary action shall be to correct the employee's behaviour to ensure that similar mistakes are avoided in future.



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POLICY MANUAL	Doc Ref No: BEE/PM/6
Title: Document Control	Revision No: 01
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POLICY STATEMENT

We have implemented a procedure to ensure that all authorised editions of appropriate documents of internal or external origin, are available at all locations where operations are performed, that documents are periodically reviewed, and where necessary, that they are revised 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 authorised.



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POLICY MANUAL	Doc Ref No: BEE/PM/7
Title: Control of Records	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall implement and maintain a procedure to maintain records on the audit and verification process of all its verified entities, including all entities that submitted requests for verification, and all entities verified.

Records that shall be maintained shall include, but not be limited to, request for verification information and initial and on-going verifications, justification for the time determined for verification (Verification Plans), records of complaints and appeals, and any subsequent corrections or corrective actions, deliberations and decisions, if applicable, documentation on decisions, and a record of BB-BEE Verifications issued.

All internal and external personnel shall adhere to our implemented Control of Records procedure to ensure that the confidentiality and integrity of our clients' information is maintained. When records are being transported or transferred, secure handling shall ensure that confidentiality is maintained.



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POLICY MANUAL	Doc Ref No: BEE/PM/8
Title: Appeals	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall implement and maintain a procedure for receiving, evaluating and making decisions on appeals. A copy of our appeal procedure shall be made available on our website and shall be attached as an annexure to the Verification Agreement. 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 appellant with a formal notice of the end of the appeal-handling process. Appeal decisions shall be made by an individual not involved in the matter that is the subject of the appeal.



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B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/9
Title: Complaints	Revision No: 01
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POLICY STATEMENT

It is the policy of **BEE Empowered and Labour Consultancy CC** to ensure that all types of complaints received from whatever source are recorded, properly investigated and resolved timely and effectively.

The person investigating a complaint shall be completely independent from the complaint or the activities surrounding the complaint. A procedure has been established to outline the process of handling and resolving complaints. A copy of our complaint procedure shall be available upon our website and shall be attached as an annexure to the Verification Agreement. Trends on the nature of complaints shall be analysed on a continuous basis and used to improve our management system, client services, verification activities and processes.



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POLICY MANUAL	Doc Ref No: BEE/PM/10
Title: Internal Auditing	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall implement and maintain procedures 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 shall address all elements of the verification process/system, including verification activities. Trained and qualified personnel, who are, whenever resources permit, independent of the activities to be audited, shall carry out such audits.

When audit findings cast doubt on the effectiveness of our operations, we shall take timely corrective action and shall 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 said corrective action implemented.



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POLICY MANUAL	Doc Ref No: BEE/PM/11
Title: Corrective Action	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall establish, implement and maintain a procedure and shall designate appropriate authorities for implementing corrective action when departures from policies and procedures in our management system or verification processes have been identified.

The procedure for corrective action shall commence with an investigation to determine the root cause(s) of the problem. All persons involved in the activity under investigation, shall be involved in the investigation process so that all facts are taken into account so that the possible cause(s) of the problem can be correctly identified. Once we have identified the possible cause(s) of the problem, we shall identify potential corrective actions where corrective action is needed. We shall select and implement the actions that are most likely to eliminate the problem and to prevent recurrence. We shall monitor the results to ensure that the corrective actions taken have been effective. Should we find that the corrective actions that we implement, are effective, we shall maintain those corrective actions. Should we however find that the corrective actions that were implemented, are ineffective, we shall identify and implement alternative corrective actions. This procedure shall be repeated until we are satisfied that the cause(s) of the problem have been correctly addressed. Where the identification of non-conformities or departures casts doubt on our compliance with our own policies and procedures, we shall ensure that the appropriate areas are audited as soon as possible. Re-training on the amended policies and procedures shall be provided to the relevant person(s), who shall acknowledge that they have been retrained on the amended policies and procedures.



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POLICY MANUAL	Doc Ref No: BEE/PM/12
Title: Management Review	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall implement and maintain a procedure in terms of which our top management shall be responsible to review our management system, including information on relevant complaints and appeals from users of our verification services, in accordance with a predetermined schedule. Top management responsible for the said review shall record their findings and their recommended actions that need to be implemented to ensure that our management system correctly reflect our activities. Top management shall ensure that those actions are carried out within an appropriate and agreed upon time. Re-training on the amended policies and procedures of the relevant people within our organisation shall take place to ensure that the amended policies and procedures are maintained. Employees shall be required to sign off that they have been re-trained on the amended policies and procedures.



POLICY MANUAL	Doc Ref No: BEE/PM/13
Title: Request for a BEE Verification	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall require an authorised representative of the enterprise requesting verification to complete a Request for Verification form, furnishing us with sufficient detail in order to inter alia determine whether or not we have the necessary competence and ability to perform the requested verification services. Information that we would require shall be the following: the general features of the enterprise, including the name and the address(es) of its physical location(s); information about their activities, its human and other resources, its functions and relationships within a larger corporation, if any, and information concerning the enterprise’s use of consulting services relating to BEE.

Before proceeding with the verification, we shall determine whether the information furnished by the requesting enterprise is sufficient for the conduct of the Review of the Request for Verification, whether the requesting enterprise received detailed documented information regarding the requirements for verification and whether or not known differences between us and the requesting enterprise had been sufficiently addressed.

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



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POLICY MANUAL	Doc Ref No: BEE/PM/14
Title: Information on the Verification Process	Revision No: 01
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POLICY STATEMENT

Upon receiving an enquiry about our verification services, we shall furnish our prospective client with sufficient information regarding the requirements of BEE Verification, their rights and obligations in respect thereof, the rights and obligations regarding their use of their verified BEE status in communications of any kind, information about our fees and the process involved in obtaining a BEE Verification, as well as information on the procedure for handling complaints and appeals.

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



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POLICY MANUAL	Doc Ref No: BEE/PM/15
Title: Verification Preparation	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall ensure that it has a process for selecting and appointing verification analysts, including the verification team leader, that are competent after having taken into account the objectives of the verification that needs to be met.

It shall require that the selected verification analysts and team leader disclose any former or envisaged link to the enterprise to be rated. Verification analysts, including the team leader, shall be impartial and objective at all times.

The client enterprise shall be verified in accordance with a Verification Plan, which shall form the basis of the agreement between the client enterprise and us. The Verification Plan shall be verified by taking the size of the enterprise, the complexity of its structures, products and processes, its demonstrated level of commitment to BEE and its previous verification into consideration. If a client enterprise is covering the same activity in various different locations, a sampling programme shall be developed to ensure proper verification of the entire organisation. We shall document the rationale for the sampling plan for each client.

The tasks of the verification analysts shall be clearly defined to ensure that they are able to support their findings with documentary evidence. We shall furnish the client enterprise with details regarding the qualifications and competence of each appointed verification analyst prior to the verification to enable the client enterprise to raise its objection against any particular verification analyst. Should the enterprise have a valid objection, the verification team shall be reconstituted. The Verification Plan shall be communicated and the dates of the verification shall be agreed upon with the client enterprise prior to the verification. On-site verifications procedures shall be documented.



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POLICY MANUAL	Doc Ref No: BEE/PM/16
Title: Verification Methodology	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall verify, evaluate and validate information obtained from measured enterprises based on the principles encapsulated in the BB-BEE Codes of Good Practice, issued under Section 9(1) of the Broad-based Black Economic Empowerment Act, 2003 (Act No. 53 of 2003) and shall include all relevant elements of the broad-based BEE Scorecard. All verifications shall be based on information that has been verified by an on-site verification to the measured enterprise in order to reach its opinion on the BEE status of a measured enterprise. Simple telephonic or electronic enquiries shall not constitute verification. No BB-BEE score shall be given without an on-site verification of the measured enterprise.

When using computers for calculating scores, we shall ensure that the computer software developed is documented in sufficient detail and is suitably validated as being adequate. All internal and external personnel shall adhere to our Control of Records procedure, which have been established and implemented for protecting data. This purpose of the aforesaid procedure is to protect and maintain the integrity and confidentiality of data entry or collection, data storage, data transmission and data processing. We shall ensure that our computers are maintained on a regular basis. All computer data shall be stored on an external hard drive, which will be kept in a safe, at a different location than our verification offices.



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POLICY STATEMENT

The Verification Team appointed by **BEE Empowered and Labour Consultancy CC** shall carry out verifications in accordance with a Verification Plan at the site(s) of the measured enterprise. The purpose of such verification shall be to gather evidence to measure the enterprise's BB-BEE progress or status. The Verification Team shall rate a sufficient number of examples of the activities of the enterprise in relation to the BB-BEE criteria to arrive at a sound appraisal of the enterprise's BB-BEE status. As part of the verification process, the Verification Team shall interview a sufficient number of staff, including top management and operational personnel of the enterprise, to provide assurance that the information gathered is sound.

The measured enterprise shall receive a copy of our On-Site Verification Report after the Verification Team has analysed all the information and verified the gathered information. We shall retain ownership of the On-Site Verification Report.



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POLICY MANUAL	Doc Ref No: BEE/PM/18
Title: Verification Decisions	Revision No: 01
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BEE Empowered and Labour Consultancy CC shall develop, implement and maintain procedures and structures to ensure that the person(s) and or verification committee members responsible for verification decisions shall have a level of knowledge and experience sufficient to evaluate the verification process, results and recommendations of the verification team.

BEE Empowered and Labour Consultancy CC shall ensure that the person(s) or committee members that are responsible for the verification decision are different from those who carried out the verification.

The person(s) or committee members responsible for the verification decision, shall confirm prior to making of the verification decision, that the information provided by the verification team, which should include as a minimum, the Verification Agreement, the duly completed BEE Compliance Questionnaire, together with the supporting documentation thereto, the verification recommendations from the verification team as set out in the duly completed Scorecard Analysis documents, are sufficient with respect to the BB-BEE verification requirements.



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POLICY MANUAL	Doc Ref No: BEE/PM/19
Title: Verification Certificate	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall provide to its measured clients, by any means it chooses, a BB-BEE Verification Certificate that shall identify the name and identifiable physical location(s) of the measured enterprise, the company registration number, the company's VAT registration number, the dates of granting of the BB-BEE score and the period of validity, the expiry date of the Verification Certificate, the unique identification 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 (after we have been accredited) and the overall BB-BEE Procurement Recognition level of the measured enterprise, as well as the BB-BEE Status level of each of the seven elements. We shall ensure that the effective date of the Verification Certificate shall not be a date before the BB-BEE Score was decided.



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POLICY MANUAL	Doc Ref No: BEE/PM/20
Title: Personnel Competency	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall ensure that all internal staff members, as well as external verification analysts utilized from time to time, have access to up-to-date knowledge relevant to BB-BEE 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 BB-BEE verifications. Such advice may be provided by internal and external experts.



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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall, irrespective of the use made of external or temporary resources, have, as part of its own enterprise, personnel having competence to manage the BEE 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 his or her duties, responsibilities and authority.

We shall implement a recruitment, induction and training procedure defining the processes for selecting, training and formally authorizing and monitoring verification analysts and experts used in the verification process. The initial competency evaluation of verification analysts shall include observing an on-site verification undertaken by the person being evaluated. We shall have a process for ensuring that the verification analysts we use (including team leaders) are competent to verify specific areas of the elements of the BB-BEE scorecard for the complexity of the enterprise being verified. We shall ensure that the verification personnel are familiar with our verification processes/ system, BB-BEE verification requirements, methodology and other relevant requirements. We shall give our verification personnel access to an up-to-date set of documented procedures giving evaluation instructions and all relevant information on verification operations. We shall use verification analysts and experts only in those activities in which they have demonstrated competence. Our verification personnel shall be required to perform the BB-BEE verifications satisfactorily. We shall have documented procedures and criteria in place for the monitoring of the performance of all people involved in the verification process, based on the frequency of their usage and the level of risk linked to their activities. The competence of our personnel shall be regularly reviewed in order to identify their training needs. We shall have appropriate documented requirements for monitoring the performance of our verification analysts and experts. These

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requirements shall include a combination of on-site observations, review of evaluation reports and feedback from verified enterprises and from the market. We shall observe the performance of each verification analyst and expert on site once every four years. The frequency of on-site observations shall be based on the needs determined from all monitoring information available. We shall offer or provide access to specific training in order to make our verification analysts knowledgeable with regard to the BEE verification requirements and processes.

We shall ensure that the person(s) or members of the verification committee responsible for verification decisions have the knowledge and experience to evaluate the BEE Verification processes and the related recommendations of the Verification Team.



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B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/22
Title: External Verification Analysts	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall require external verification analysts and experts to enter into a written agreement by which they commit themselves to comply with the all our applicable policies and procedures. The agreement referred to herein, shall address aspects of confidentiality and independence from commercial and other interests, and shall require from them to notify us of any existing or prior association with any entity that they may be assigned to evaluate.



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POLICY MANUAL	Doc Ref No: BEE/PM/23
Title: Personnel Records	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall 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.



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B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/24
Title: Outsourcing	Revision No: 01
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POLICY STATEMENT

After having analysed our relationships with other verification agencies for the possibility of conflict of interest, we made it our policy that we will not outsource any of our verification activities as we believe a conflict of interest that may arise should an employee of another verification agency carry out any of our verification activities whilst employed by another verification agency. We further believe that outsourcing could pose a high risk to our obligation to maintain the confidentiality and integrity of our clients' information.

It is our policy not to outsource any of our verification activities, including, but not limited to the responsibility for BEE verification decisions; the granting of the BEE Verification decisions, as well as the withdrawing of the BEE verification decisions in circumstances where measured enterprises make incorrect or misleading statements regarding their BB-BEE Score or where measured enterprises use its verification status in such a manner that would result in us losing public interest or that would bring our company into disrepute.



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B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/25
Title: Special Evaluations	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall conduct evaluations of entities at short notice in order to investigate complaints or in response to changes. 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 take special care in the selection and appointment of the verification team as the enterprise to be evaluated shall not have an opportunity to object to the verification team.



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B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/26
Title: Information Request Directory	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall maintain and provide, upon request, information about its activities to SANAS. The information we provide to any verified enterprise or to the marketplace, including advertising, shall be accurate and not misleading.

We shall make information about the BB-BEE Status level granted to any of the measured enterprise that we have verified, available on our website. On request from SANAS, and/or the rated enterprise, we shall provide means to confirm the validity of a given BB-BEE Score. We shall provide to **the dti**, upon completion of every verification, the BEE status level of the measured entities. We shall maintain and make available to **the dti** a current directory of valid Verification Certificates which shall 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 BEE score and the period of validity, the expiry date of the Verification Certificate, the unique identification 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 (after we have obtained accreditation) and the overall BB-BEE Procurement Recognition level of the measured entity as well as the BB-BEE Status level of each of the seven elements.



BEE EMPOWERED

B E E R A T I N G A G E N C Y

POLICY MANUAL	Doc Ref No: BEE/PM/27
Title: Reference to Verification and Use of Mark	Revision No: 01
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POLICY STATEMENT

BEE Empowered and Labour Consultancy CC shall allow its measured entities to use its 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 or advertising.

In circumstances where measured enterprises make use of any misleading statements regarding their BB-BEE Score, or where they use their BB-BEE Verification Certificate, or any part thereof, in a misleading manner, we shall retain the right to withdraw their BB-BEE Verification Certificate with immediate effect.

We shall furthermore retain the right to withdraw a measured enterprise’s BB-BEE Verification Certificate if the said measured enterprise used its verification status in such a manner that would result in us losing public trust or that would bring our company into disrepute.

The Verification Certificate shall remain our property and measured entities shall reproduce its Verification Certificate only in full. We shall reserve to take action against measured entities should they make inaccurate or incorrect references to their BB-BEE Status Level.