

Case No. 6/3/2018

Mr Dean Macpherson
Member of Parliament
115 Golf Course Drive
Mount Edgecombe
Durban
4001
Kwa Zulu-Natal Province

By e-mail: dean@eduform.co.za

Dear Mr Macpherson

FINAL FINDINGS: DW MACPHERSON // ESKOM HOLDINGS SOC LIMITED

1. The above complaint refers.
2. Kindly be advised that the Broad-Based Black Economic Empowerment Commission ("B-BBEE Commission") has finalised its investigation regarding the above mentioned complaint in terms of section 13F (1) (d) and section 13J (1) of the Broad-Based Black Economic Empowerment Act No. 53 of 2003 as amended by Broad-Based Black Economic Empowerment Act No. 46 of 2013 ("B-BBEE Act"), read with regulation 15 of the B-BBEE Regulations regulating the administration of the Broad-Based Black Economic Empowerment Act and the functions of the B-BBEE Commission, 2016 ("B-BBEE Regulations") issued pursuant to section 14 of the B-BBEE Act, and in line with the rules relating to fair administration of justice process applicable to investigations as expressed in regulation 15 (17) of the B-BBEE Regulations.

3. As you are aware, the investigation was in response to a complaint you lodged in terms of section 13F (1) (c) of the B-BBEE Act wherein you alleged practices that are contrary to the objectives of the B-BBEE Act. The allegations made by you were summarised as follows for the purposes of the investigation:
- 3.1. Eskom Holdings SOC Limited accepted an invalid B-BBEE Certificate Number EME/BM15019-110216 issued by BEE Matrix (Pty) Ltd on 11 February 2016 from Tegeta Exploration and Resources (Pty) Ltd as well as the B-BBEE Sworn Affidavit from Trillian Management Consulting (Pty) Ltd deposited to on 11 April 2016 wherein these entities were categorised as exempted micro enterprises with an annual turnover of less than R5 million and less than R10 million, respectively. This is despite Eskom Holdings SOC Limited being in full knowledge of the value of the contracts and the subsequent payments made to the mentioned entities, which would have made their annual turnover higher than the turnover reflected;
- 3.2. Eskom Holdings SOC Limited accepted an invalid BBEE Certificate Number BM15680-080916 issued by BEE Matrix (Pty) Ltd on 8 September 2016 from Optimum Coal Mine (Pty) Ltd and invalid B-BBEE Certificate Number EME/BM15019-110216 issued by BEE Matrix (Pty) Ltd on 11 February 2016 from Tegeta Exploration and Resources (Pty) Ltd and failed to verify the validity of black ownership claimed by the mentioned entities, which black ownership seemingly includes foreign nationals and/or persons that do not meet the definition of black people under the B-BBEE Act in respect of contracts/work awarded to these entities; and
- 3.3. Eskom Holdings SOC Limited failed to implement the requirements of B-BBEE in the procurement process relating to the three entities in question in a manner that may be in violation of section 10 (1) (b) of the B-BBEE Act, and its conduct and/or omission may have aided misrepresentation of the B-BBEE status of the entities in violation of section 13O (1) (a) of the B-BBEE Act as well as fronting practice in violation of section 13O (1) (d) of the B-BBEE Act.
4. Having investigated the allegations on this matter in terms of the mandate under section 13F (1) (d) and section 13J (1) of the B-BBEE Act, read with regulation 15 of the B-BBEE Regulations, after affording Eskom Holdings SOC Limited an opportunity to respond to the

adverse findings in terms of regulation 15 (13) of the B-BBEE Regulations, the B-BBEE Commission in terms of section 13J (3) of the B-BBEE Act, read with regulation 15 (4) (g) of the B-BBEE Regulations, finds that Eskom Holdings SOC Limited acted in a manner that is contrary to the objectives of the B-BBEE Act in that:

4.1 The B-BBEE Certificate Number **EME/BM15019-110216** issued to Tegeta Exploration and Resources (Pty) Ltd on **11 February 2016** and accepted by Eskom Holdings SOC Limited is invalid in that:

4.1.1 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B failed in their duties and obligations when conducting the verification of Tegeta Exploration and Resources (Pty) Ltd in that they relied on Exempted Micro Enterprise Affidavit deposited by Ronica Ragavan as well as the one pager statement of comprehensive income of Tegeta Exploration and Resources (Pty) Ltd for the year ended 28 February 2015 attached to the said Exempted Micro Enterprise Affidavit, when issuing the B-BBEE Certificate Number **EME/BM15019-110216** to Tegeta Exploration and Resources (Pty) Ltd on **11 February 2016**, which categorized Tegeta Exploration and Resources (Pty) as Exempted Micro Enterprise with B-BBEE Contributor Level 3 when such was not the case;

4.1.2 The Exempted Micro Enterprise Affidavit deposited to by Ronica Ragavan upon which BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B relied when issuing the B-BBEE Certificate Number EME/BM15019-110216 to Tegeta Exploration and Resources (Pty) Ltd on 11 February 2016 attributed the entire 50.04% ownership to Indians and awarded points without verifying the existence of the black shareholders for which the black ownership is claimed, which verification process includes interviews with the said black shareholders, also noting that the black ownership of Tegeta Exploration and Resources (Pty) Ltd includes Mabengela Investments (Pty) Ltd wherein Mr Duduzane Zuma apparently holds 45% shares, however no record of the interview with Mr Duduzane Zuma was found;

- 4.1.3 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B failed in their duties and obligations when they relied on a one pager statement of comprehensive income of Tegeta Exploration and Resources (Pty) Ltd for the year ended 28 February 2015 attached to the Exempted Micro Enterprise Affidavit of Ronica Ragavan in arriving at the decision to classify Tegeta Exploration and Resources (Pty) Ltd as an Exempted Micro Enterprise when the Verification Manual requires Verification Agencies to use audited financial statements, which means a complete set of audited financial statements, where an entity is required to undergo an audit, duly signed by the directors of the entity concerned. Further, not only does the information contained in the one pager statement of the so-called comprehensive income appear incomplete and devoid of a document that must be accorded a professional status, but it refers to the notes on pages 16, 17, 18 and 19 that were not part of the said one pager document;
- 4.1.4 Records show that Tegeta Exploration and Resources (Pty) Ltd had concluded a contract with Eskom Holdings SOC Limited signed on 10 March 2015 for the period from 1 April 2015 to 30 September 2025 for R3.8 billion, and in the year 2015 Tegeta Exploration and Resources (Pty) Ltd had already received payment in excess of R100 million, which made Tegeta Exploration and Resources (Pty) Ltd a large entity that ought to have been verified as such using the generic score card, however, BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B opted to accept an affidavit attaching a one pager statement of the so-called comprehensive income instead of the management accounts of Tegeta Exploration and Resources (Pty) Ltd for the year ended 28 February 2016 that would have clearly reflected the turnover for the year being measured;
- 4.1.5 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B issued a B-BBEE Certificate Number **EME/BM12930-100215** on **10 February 2015** based on the new Codes of Good Practice

of 2013 classifying Tegeta Exploration and Resources (Pty) Ltd as Exempted Micro Enterprise with turnover of less than R10 million, which B-BBEE certificate was submitted to Eskom Holdings SOC Limited, however, they subsequently issued a B-BBEE Certificate Number **EME/BM15019-110216** on **11 February 2016** to the same entity based on the old Codes of Good Practice of 2007 classifying Tegeta Exploration and Resources (Pty) Ltd as Exempted Micro Enterprise with less than R5 million in turnover, despite payments in excess of R100 million received in 2015 by Tegeta Exploration and Resources (Pty) Ltd, making implausible their argument that they relied on the transitional period clarification, that permitted the old Codes of Good Practice of 2007 to be used for entities whose financial year end was on or before 30 April 2015;

- 4.1.6 Even if it were to be accepted that Tegeta Exploration and Resources (Pty) Ltd was Exempted Micro Enterprise, BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B failed in their duties and obligations as a verification agency and professional in issuing Certificate Number **EME/BM15019-110216** to Tegeta Exploration and Resources (Pty) on **11 February 2016** contrary to paragraph 4 of Statement 000 of the Codes of Good Practice 2013, which states that Exempted Micro Enterprises are only required to obtain a sworn affidavit on an annual basis confirming the entity's revenue and level of black ownership;
- 4.1.7 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B failed in their duties and obligations as verification agency and professional when they relied on the strength of the third party information, being the letters dated 26 January 2016, 8 February 2016 and 20 April 2016 from Ithemba Governance and Statutory Solutions (Pty) Ltd, in respect of Tegeta Exploration and Resources (Pty) Ltd to confirm black ownership of **50,04%** in both Tegeta Exploration and Resources (Pty) Ltd and issuing the B-BBEE certificate to Tegeta Exploration and Resources (Pty) Ltd, without following due process to verify the black ownership claimed by Tegeta Exploration and Resources (Pty) Ltd, which includes

interviews with black shareholders to confirm their existence for purposes of awarding points; and

- 4.1.8 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B failed in their duties and obligations when they issued B-BBEE Certificate Number **EME/BM15019-110216** to Tegeta Exploration and Resources (Pty) Ltd on **11 February 2016** using the 2007 Codes of Good Practice contrary to section 9 (7) of the B-BBEE Act as amended as these were replaced by the 2013 Codes of Good Practice which became effective on 1 May 2015 despite having issued B-BBEE Certificate Number **EME/BM12930-100215** on **10 February 2015** to Tegeta Exploration and Resources (Pty) Ltd using the correct Codes of Good Practice of 2013.
- 4.2 The B-BBEE Sworn Affidavit deposed to by Trillian Management Consulting (Pty) Ltd through Mr Tebogo Leballo on 11 April 2016 and accepted by Eskom Holdings SOC Limited, in which Trillian Management Consulting (Pty) Ltd was categorised as an Exempted Micro Enterprise with a turnover of less than R10 million and B-BBEE Contributor Level 4, whereas the size/value of payments already made to it in the same financial year were in excess of R10 million, is invalid in that:
- 4.2.1 Trillian Management Consulting (Pty) Ltd misrepresented its turnover as it is clear that by 11 April 2016, the date of which Mr Tebogo Leballo deposed to the B-BBEE Sworn Affidavit, Trillian Management Consulting (Pty) Ltd had already been paid the amount of R30 666, 000.00 which is revenue that already exceeds the R10 million threshold for Exempted Micro Enterprises;
- 4.2.2 The schedule of payments to Trillian Management Consulting (Pty) Ltd as submitted by Eskom Holdings SOC Limited indicates that the tax invoice submitted to Eskom Holdings SOC Limited was dated 31 January 2016, the payment of R30 666, 000.00 was made by Eskom Holdings SOC Limited on 1 March 2016 and the letter confirming the bank account of Trillian Management Consulting (Pty) Ltd from ABSA Bank indicates that

the bank account for Trillian Management Consulting (Pty) Ltd was opened on 2 March 2016, which raises a concern as to how B-BBEE compliance was confirmed given that the relevant documents for the payment were only submitted after the payment was transmitted;

4.2.3 Trillian Management Consulting (Pty) Ltd had received payments in excess of R10 million in the said financial year, therefore the B-BBEE Sworn Affidavit submitted to Eskom Holdings SOC Limited is invalid for purposes of compliance with the B-BBEE Act and misrepresented the B-BBEE status of Trillian Management Consulting (Pty) Ltd as a B-BBEE Contributor Level 4 in the absence of a proper verification process being conducted in accordance with its rightful categorisation as a Qualifying Small Enterprise or generic enterprise, as the case may be;

4.2.4 Trillian Management Consulting (Pty) Ltd would not have qualified for a B-BBEE Sworn Affidavit even if it were categorised as a start-up as the Codes of Good Practice of 2013 require a start up to be verified using the Qualifying Small Enterprise scorecard if it bids for contracts or work of value higher than R10 million; and

4.2.5 Records show clearly that the work for which Trillian Management Consulting (Pty) Ltd was engaged by Eskom Holdings SOC Limited, whether directly or indirectly, was higher than R10 million and therefore a B-BBEE certificate based on the Qualifying Small Enterprise scorecard ought to have been submitted to Eskom Holdings SOC Limited for B-BBEE compliance.

4.3 The B-BBEE Certificate Number **BM15680-080916** issued on **8 September 2016** to Optimum Coal Mine (Pty) Ltd and accepted by Eskom Holdings SOC Limited is invalid in that:

4.3.1 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B issued the B-BBEE Certificate Number **BM15680-**

080916 to Optimum Coal (Pty) Ltd on **8 September 2016** with the expiry date of **7 September 2017** without following due process for verification as outlined in the Verification Manual, and therefore invalid as it was issued in a manner that is contrary to the Verification Manual, the Codes of Good Practice of 2013 and the objectives of the B-BBEE Act;

- 4.3.2 The B-BBEE Certificate Number **BM15680-080916** was issued to Optimum Coal Mine (Pty) Ltd on **8 September 2016** by BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B without following due verification process as outlined in the Verification Manual, whereby they relied on the strength of third party information, being a letter dated 7 September 2016 from Sizwe Ntsaluba Gobodo, in respect of Optimum Coal Mine (Pty) Ltd to confirm black ownership of **50,04%** in Optimum Coal Mine (Pty) Ltd flowing from Tegeta Exploration and Resources (Pty) Ltd;
- 4.3.3 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B awarded points for black ownership on the B-BBEE Certificate Number **BM15680-080916** to Optimum Coal Mine (Pty) Ltd on **8 September 2016** without independently verifying that the black ownership claimed by Optimum Coal Mine (Pty) Ltd meets the definition of 'black people' under the B-BBEE Act despite the fact that the Exempted Micro Enterprise Affidavit deposed to by Ronica Ragavan on 8 February 2016 confirming the black ownership of Tegeta Exploration and Resources (Pty) Ltd reflects the black ownership to comprise only of Indians, with no recognition reflected for Africans or Coloureds, which put into question the black ownership claims made;
- 4.3.4 BEE Matrix (Pty) Ltd and Ms Simone Mitchell with IRBA registration number 497088B issued the B-BBEE Certificate Number **BM15680-080916** to Optimum Coal (Pty) Ltd on **8 September 2016** is therefore issued contrary to the Verification Manual, Codes of Good Practice and the objectives of the B-BBEE Act; and

4.3.5 Ms Simone Mitchell with IRBA registration number 497088B acted improperly when she acted as the Commissioner of Oaths in respect of the B-BBEE Certificate Number **BM15680-080916** issued to Optimum Coal (Pty) Ltd on **8 September 2016** by BEE Matrix, with her as the technical signatory, which B-BBEE certificate was submitted to and accepted by Eskom Holdings SOC Limited for B-BBEE compliance. In doing so, Ms Simone Mitchell signed the certificate in two capacities, firstly in her capacity as B-BBEE Approved IRBA Auditor with registration **number 497088B** and secondly as a CA (SA) with registration **number 00063701** acting as the Commissioner of Oath. This conduct constitutes conflict of interest and is contrary to the regulations governing the administering of an Oath or Affirmation, as well as the guidelines provided by South African Institute of Chartered Accountants in respect of the duties of the Commissioner of Oath.

4.4 In terms of section 10 (1) of the B-BBEE Act, every organ of state and public entity **must** apply the relevant code of good practice issued by the Minister of Trade and Industry in accordance with section 9 of the B-BBEE Act in (a) determining qualification criteria for the issuing of licences, concessions or other authorisations in respect of economic activity in terms of any law; (b) developing and implementing a preferential procurement policy; (c) determining qualification criteria for the sale of state owned enterprises; (d) developing criteria for entering into partnerships with the private sector; and (e) determining criteria for the awarding of incentives, grants and investment schemes in support of B-BBEE. Eskom Holdings SOC Limited violated the B-BBEE Act when it accepted the B-BBEE certificate of Tegeta Exploration and Resources applying the 2007 Codes of Good Practice that had been repealed, contrary to the section 9 of the B-BBEE Act and the threshold reflected as not more than R5 million, when Eskom Holdings SOC Limited had already advanced payments way in excess of the threshold amount stated on the B-BBEE certificate in question, and by accepting the B-BBEE Sworn Affidavit of Trillian Management Consulting (Pty) Ltd that classified it as an Exempted Micro

Enterprise despite a payment of R30 666, 000. 00 made on 1 March 2016 prior to the signing of the B-BBEE Sworn Affidavit in question.

- 4.5 Eskom Holdings SOC Limited paid Trillian Management Consulting (Pty) Ltd directly for the services rendered without contract, which clearly indicates that the procurement process was not followed, and even if the procurement process had been properly followed, Trillian Management Consulting (Pty) Ltd had 0% black ownership contrary to the practice of Eskom Holdings SOC Limited of 51% black ownership and below the target of 25+1% set in the Codes of Good Practice of 2013. Noting that Eskom Holdings SOC (Pty) Ltd made payment to Trillian Management Consulting (Pty) Ltd before it can be a registered vendor and prior to receiving its B-BBEE certificate or sworn affidavit as a clear indication that Eskom Holdings SOC Limited did not comply with section 10 (1) (b) of the B-BBEE Act.
- 4.6 Eskom Holdings SOC accepted B-BBEE Certificates that was issued by BEE Matrix (Pty) Ltd under B-BBEE Certificate Number EME/BM15019-110216 to Tegeta Exploration and Resources (Pty) Ltd and the B-BBEE Sworn Affidavit from Trillian Management Consulting (Pty) Ltd dated 11 April 2016 in contravention to the Codes of Good Practice and the objectives of the B-BBEE Act when Eskom Holdings SOC Limited had full knowledge of the value of the contracts and/or work with Tegeta Exploration and Resources (Pty) Ltd and Trillian Management Consulting (Pty) Ltd and the payments already made to the two entities for the period being measured.
- 4.7 The process to obtain an exemption or deviation from section 10 (1) of the B-BBEE Act is clearly stipulated in Part 7 Regulation 20 of the B-BBEE Regulations issued by the Minister of Trade and Industry in accordance with section 14 of the B-BBEE Act and Eskom Holdings SOC Limited as a state owned entity has not been approved for an exemption or a deviation, which means it was and is obliged to apply section 10 (1) (b) of the B-BBEE Act in its procurement processes, however it has failed to do so in respect of its procurement relating to Trillian Management Consulting (Pty) Ltd and Tegeta Exploration and Resources (Pty) Ltd.

- 4.8 Having regard to evidence before the B-BBEE Commission, Eskom Holdings SOC Limited acted negligently and contrary to the Codes of Good Practice and the B-BBEE Act as its officials had all the necessary information at their disposal to identify the misrepresentation of the B-BBEE status, especially in regard to Trillian Management Consulting (Pty) Ltd and Tegeta Exploration and Resources (Pty) Ltd in respect of their turnover values.
- 4.9 Eskom Holdings SOC Limited awarded and continued with these contracts and/or work relating to Trillian Management Consulting (Pty) Ltd and Tegeta Exploration and Resources (Pty) Ltd based on false information and/or misrepresentation of BEE status in a manner that would justify the cancellation of the contracts and/work in question in terms of section 13A of the B-BBEE Act.
- 4.10 The conduct of the officials of Eskom Holdings SOC Limited, in particular, Anoj Singh, Prish Govender, Edwin Mabelane and a certain A. Nteta, who were aware of the value of the contracts/work and payments made to Trillian Management Consulting (Pty) Ltd and Tegeta Exploration and Resources (Pty) Ltd by virtue of their roles and positions in Eskom Holdings SOC Limited, however, failed to prevent this conduct and to report the misrepresentation to the B-BBEE Commission or any enforcement agency, would amount to an offence in terms of section 13O (2) of the B-BBEE Act.
- 4.11 Eskom Holdings SOC Limited stated that it could not have been able to verify the correctness of the B-BBEE ownership reflected on the B-BBEE certificates submitted to it by Tegeta Exploration and Resources (Pty) Ltd and Optimum Coal (Pty) Ltd as it relied on the verification review conducted by the accredited verification agency, in this case BEE Matrix (Pty) Ltd, which the B-BBEE Commission accepts in respect of this specific matter, it being noted that Eskom Holdings SOC Limited still failed to verify the turnover value reflected in the B-BBEE certificate of Tegeta Exploration and Resources (Pty) Ltd when the value of the contract with and payments made to Tegeta Exploration and Resources (Pty) Ltd were within its knowledge, an aspect that was not dependent on the verification

agency or professional to determine clearly indicating possible complicity or pure negligence.

- 5 Based on the above-mentioned findings, as well as the level of cooperation demonstrated by Eskom Holdings SOC Limited during the investigation, and further noting the serious consequences of the conduct, the B-BBEE Commission resolved to make the following recommendations:


- 5.1 that Eskom Holdings SOC Limited must within **90 (ninety)** days of these findings consider cancelling all contracts and/or work awarded, whether renewed or extended, on the basis of misrepresentation and false information submitted to in relation to Tegeta Exploration and Resources (Pty) Ltd, Optimum Coal (Pty) Ltd and Trillian Management Consulting (Pty) Ltd in terms of section 13A of the B-BBEE Act and appropriate action be taken, including action to recover the monies already paid to the said entities, it being noted that the B-BBEE Commission has noted that pursuant to its investigation, Eskom Holdings SOC Limited has proceeded to seek repayment from Trillian Management Consulting (Pty) Ltd;
- 5.2 that Eskom Holdings SOC Limited must immediately report to the appropriate division of the South African Police Services and/or National Prosecuting Authority for appropriate criminal processes in respect of the conduct of Tegeta Exploration and Resources (Pty) Ltd, Optimum Coal (Pty) Ltd and Trillian Management Consulting (Pty) Ltd for misrepresentation of the B-BBEE status and for providing false information to Eskom Holdings SOC Limited, which are offences under section 13O (1) (a) and (c) of the B-BBEE Act, and providing false information or misrepresented information to the verification professional and/or agency, which is an offence under section 13O (1) (b) of the B-BBEE Act;
- 5.3 that Eskom Holdings SOC Limited must immediately report the conduct of the officials involved in these matters to the South African Police Services, in particular those who facilitated the processing and payment of these monies, for appropriate criminal investigations and processes to be initiated against them for their conduct in terms of the B-BBEE Act, or any other law; and

- 5.4 that Eskom Holdings SOC Limited must within **90 (ninety)** days develop and submit a B-BBEE Compliance Programme which is aimed at ensuring that Eskom Holdings SOC Limited and its officials adhere fully to the B-BBEE Act as required in order to prevent this from occurring in the future, it being noted that Eskom Holdings SOC Limited has already been required by the B-BBEE Commission to conduct an audit of all its contracts above R1 billion concluded from 2014 under **Case Number 1/7/2017**.
- 6 The B-BBEE Commission may at any time invoke the provisions of section 13J (4) and 13J (5) of the B-BBEE Act in relation to this matter as it deems necessary, particularly in the event that the recommendations are not adhered to by Eskom Holdings SOC Limited.
- 7 The B-BBEE Commission therefore hereby issues this letter to notify you of the findings and recommendations it has made in respect of this complaint in line with regulation 15 (12) (b) of the B-BBEE Regulations and will proceed to publish the findings in a manner it deems appropriate.
- 8 Please be advised that Eskom Holdings SOC Limited has been advised to indicate if it will implement the recommendations in paragraph 5 above **within 14 (fourteen) days**, failing which the B-BBEE Commission would proceed with any of the actions in terms of the B-BBEE Act against Eskom Holdings SOC Limited.
- 9 **Please be advised that until the B-BBEE Commission publishes its findings, the contents of this letter are restricted information and you are required to refrain from communicating the contents of this letter to any other person in compliance with the provisions of the B-BBEE Act.**
- 10 Should you wish to discuss or clarify any of the issues raised in this correspondence, please feel free to contact the B-BBEE Commission on telephone number **+27 12 649 0910** or by email MRamare@beecommission.gov.za.

- 11 Please ensure that you use the assigned **Case Number** in all your correspondence with the B-BBEE Commission in respect of this complaint.

We trust that you will find the above in order.

Yours sincerely,



Ms Moipone Kgaboesele
Executive Manager
Investigations and Enforcement
Date: 12 /July 2019