

THE REPUBLIC OF UGANDA

**PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS APPEALS TRIBUNAL
(PPDA APPEALS TRIBUNAL)**

APPLICATION NO 2 OF 2020

APPLICATION FOR REVIEW OF THE DECISION OF THE PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS AUTHORITY IN RESPECT TO THE PROVISION OF SECURITY INFORMATION AND EVENT MANAGEMENT SOLUTION BOU/NCONS/18-19/00447/C.

APPLICANT: BANK OF UGANDA

RESPONDENT: PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS AUTHORITY

(Before: OLIVE ZAALE OTETE- CHAIRPERSON, ABRAHAM NKATA-MEMBER, DAVID KABATERAINE-MEMBER, AND ENG. THOMAS BROOKES ISANGA-MEMBER.)

DECISION OF THE TRIBUNAL

1.0 BRIEF FACTS

1. On 13th May 2015, the Applicant applied to the Respondent for accreditation of the Bank of Uganda Procurement and Disposal Regulations and the Bank of Uganda Standardisation Policy for goods and related services which the Applicant intended to use for all its procurement and disposal activities.
2. By letter dated 17th June 2015, the Respondent noted that the Applicant's application was an omnibus application which did not clearly state how the current laws affected the operations of the Applicant which would necessitate an accreditation. In the said letter, the Respondent invited the Applicant for a meeting which was held on 23rd June 2015 between the Applicant and the Respondent. By letter dated 3rd July 2015, the Applicant forwarded additional supporting information as requested by the Respondent.
3. The Respondent considered the application by the Applicant requesting for accreditation in respect to a number of proposals made by the Applicant. By letter dated 26th July 2015, the Respondent made a detailed response to each of the proposals where accreditation was sought, agreeing to accredit some areas, and advising that some of the proposals did not require accreditation.
4. With respect to the proposal by the Applicant for accreditation of '*New Schedule detailing the Bank of Uganda core and non-core procurements and disposals as provided for in section 4 of the Bank of Uganda Act*', which is at issue in this Application, the response was 'This is not an area for accreditation. It is an administrative matter'.
5. In the same letter dated 26th July 2015, the Respondent advised the Applicant to refer to the document as a 'Manual' as opposed to 'Regulations' and granted the accreditation for two years with effect from 24th July 2015, and further advised that the Applicant should forward a status of implementation of the accreditation within three months from the date of receipt of the letter granting the accreditation.
6. On 12th July 2019, the Applicant published a bid notice under open bidding method for the provision of Security Information and Event Management Solution (SIEM). The Bid Notice stated that bidding would be conducted in

accordance with the Open International Bidding method contained in the Bank of Uganda Procurement and Disposal Manual 2017 (BoU Manual 2017).

7. Following the Applicant's technical evaluation of the bids, one of the unsuccessful bidders, Mantra Technologies in joint venture with Infigo IS D.O.O, by letter dated 20th November 2019, applied for administrative review to the Applicant.
8. By its letter dated 27th November 2019, the Respondent advised the Applicant to investigate and address Mantra Technologies complaint in accordance with Section 90 of the PPDA Act, 2003 and the Regulations made under the Act.
9. In its letter dated 28th November 2019, the Applicant rejected the application for administrative review.
10. On 9th December 2019, Mantra Technologies in joint venture with Infigo IS D.O.O. made an application for administrative review to the Respondent.
11. In its letter dated 10th December 2019, the Respondent informed the Applicant that it had received an application for administrative review from Mantra Technologies and that it had instituted an investigation in the matter and instructed the Applicant to suspend the procurement process.
12. By letters dated 28th November 2019 and 20th December 2019, the Applicant explained that in accordance with Section 4 of the Bank of Uganda Act, Cap 51, (BoU Act) the Applicant runs systems which are used in processing and transmitting vital Government payment instructions. The SIEM tender is part of the Applicant's core procurements categorised as procurement in exercise of the Bank's mandate under section 4 of the BoU Act. The Applicant stated that in its view, the SIEM procurement was outside the purview of the PPDA Act, 2003, and that the Applicant should be left to proceed with the procurement.
13. In its letter dated 10th January 2020, the Respondent informed the Applicant that its Board of Directors had considered the application for administrative review and the submissions of the Governor and found that:
 - a) the Bid Notice dated 12th July 2019 in respect to the impugned procurement and the bidding document issued indicated that the

bidding process was conducted in accordance with the BoU Manual 2017;

- b) The use of the BoU Manual 2017 by the entity that has never been accredited by the Authority is contrary to the PPDA Act, 2003. Section 40A of the PPDA Act, 2003 provides that an entity that is not able to comply with a particular procurement or disposal procedure may apply to the Authority for accreditation of an alternative system. Where the system is accredited, the entity submits a Manual containing the system which are approved and accredited by the Authority.
- c) the procurement conducted under the BoU Manual 2017 not accredited by the Authority is null and void; and
- d) that the Reference to section 4 of the BoU Act was not applicable in the context of the Manual.

- 14. Being dissatisfied with the decision of the Respondent, the Applicant on 24th January 2020 filed this Application before the Tribunal.

2.0 APPLICATION FOR REVIEW OF THE AUTHORITY'S DECISION

- 2.1 On 24th January, 2020, the Applicant lodged with the Public Procurement and Disposal of Public Assets Appeals Tribunal (the Tribunal) an application for review of the decision of the Authority dated 10th January 2020.

- 2.2 In the Application, the Applicant prayed that the Tribunal sets aside the decision of the Respondent and makes the following declarations/orders:
 - (a) A declaration that the Respondent does not have any jurisdiction over the Applicant's procurement and disposal activities in the exercise of the Applicant's functions specified in section 4 of the Bank of Uganda Act, Cap 51;
 - (b) An order setting aside the Respondent's findings, decision and orders in its letter dated 10th January 2020;
 - (c) An order setting aside the Respondent's instruction to the Applicant to suspend any further action on the procurement.

3.0 DISPOSAL OF APPLICATION

3.1 In disposing of the application, the Tribunal analysed the following documents-

- 1) The Application dated 23rd January 2020, and lodged with the Tribunal on 24th January 2020 and annexes attached thereto;
- 2) The Applicant's written submissions and Annexes to the submissions;
- 3) The Respondent's written response filed with the Tribunal on 28th January 2020;
- 4) The Bank of Uganda Procurement and Disposal of Assets Procurement Manual 2017.

3.2 The Tribunal conducted a hearing for the parties on 6th February 2020. The Applicant was represented by Mr. Byamugisha Albert while the Respondent was represented by Mr. John Kallemera.

4.0 ISSUES

The issues for which the Applicant sought a decision of the Tribunal were:

1. *Whether the Respondent has jurisdiction over procurement and disposal activities by the Applicant in the exercise of its functions specified in section 4 of the Bank of Uganda Act.*
2. *Whether the Applicant requires the Respondent's accreditation of a procurement or disposal system in respect of procurement and disposal activities by the Applicant in the exercise of its functions specified in section 4 of the Act.*
3. *Whether the procurement of a Security Information and Events Management Solution (SIEM) software falls within the ambit of the Applicant's functions under section 4 of the Act.*
4. *What remedies, if any.*

5.0 PRELIMINARY OBJECTION

5.1 At the hearing, Counsel for the Respondent raised a preliminary objection to the effect that the Applicant does not subject itself to the jurisdiction of this Honourable Tribunal or the PPDA Act, 2003 in respect to the impugned

procurement since it claims it is not a Procuring and Disposing Entity (PDE). Counsel submitted that the Applicant categorically stated that the PPDA Act, 2003 does not apply to the impugned procurement and that it is not a PDE in respect to the impugned procurement therefore it is precluded from making an application for administrative review under Section 91I of the PPDA Act, 2003.

5.2 Counsel prayed that for the above reasons, the preliminary objection should be upheld, and the application be struck out with each party bearing its own costs.

5.3 In response to the preliminary objection, Counsel for the Applicant submitted that by filing this application, the Applicant submits to the jurisdiction of the Tribunal. He submitted that under section 91I(3) of the PPDA Act, the Tribunal has powers to review a decision of the Authority where an application is properly made to the Tribunal by a PDE or by any person whose rights are adversely affected by a decision made by the Authority. Counsel submitted that the Applicant's rights are adversely affected by the Authority's decision dated 10th January 2020. Counsel prayed that the preliminary objection be overruled.

5.4 By way of rejoinder, Counsel for the Respondent submitted that by the Applicant insisting that this matter has to be heard by the Tribunal, this amounts to approbation and reprobation. He cited the cases of *Golf View Inn Uganda Limited versus Barclays Bank HCCS 358 of 2009* and *VC Limited versus Hull 1921 Volume 2 KB at page 608*, whose decisions were to the effect that one cannot approbate and reprobate at the same time.

5.5 The Tribunal directed the parties to present the merits of the Application, saving the ruling on the Preliminary Objection to be in the decision of the Tribunal on the Application.

6.0 SUBMISSIONS ON AGREED ISSUES

6.1 During the hearing, both Counsel for the Applicant and the Respondent abandoned the first and second issues and submitted only in respect to the third and fourth issues.

6.2 Counsel for the Applicant submitted that the Security Information and Events Management Solution (SIEM) aims at ensuring end to end event tracking and

remediation for all events especially targeting the Banking and Payment infrastructure and ensures a sound and secure financial system. He submitted that the procurement of SIEM falls under the category of exempt procurements under Schedule 6 of the BoU Manual 2017 *'Item 4: IT and Payments Operations namely; Supply and maintenance of specialised IT systems for Central Banking Operations e.g. RTGS, CSD, SWIFT, EFT and related information security systems (disaster recovery and business resumption), Security systems or any service related to Bank of Uganda Network'*, and that therefore the PPDA Act does not apply to it.

6.3 Counsel for the Applicant submitted that the Applicant submitted an application dated 13th May 2015 to the Respondent for accreditation of the Bank of Uganda Procurement and Disposal Regulations and the Standardisation Policy which the Applicant intended to use for all its procurement and disposal activities i.e. both those required to comply with the PPDA Act and those which are carried out by the Applicant in exercise of its functions provided in Section 4 of the BoU Act. Counsel further submitted that in response to the application for accreditation, the Respondent, in its letter dated 24th July 2015, informed the Applicant that Schedule 6 was not a matter for accreditation but was an administrative matter.

6.4 In reply, Counsel for the Respondent submitted that it is not in dispute that when exercising its functions specified in Section 4 of the BoU Act, the Applicant is not a Procuring and Disposing Entity (PDE) and it is not subject to the PPDA Act, 2003. Counsel however submitted that the SIEM solution cannot be categorised as an exercise of any of the Applicant's functions under Section 4 of the BoU Act. He submitted that the Appendix of the bidding document (page 86-124 of the Application) contains the functional requirements for the SIEM solution. He contended that these functional requirements are not an exercise of any of the functions stated in section 4 of the BoU Act. Counsel submitted that at page 84 of the Application, it is stated that the SIEM solution is to provide *real time threat detection and automated response, alerting, remediation and to support security and operations incident as well as support to IT operations*. In conclusion on this issue, Counsel for the Respondent stated that the SIEM solution is essentially a system that collects data and provides reports and alerts regarding the various systems being operated by the Applicant and does not fall within the ambit of the Applicant's functions under section 4 of the BoU Act.

- 6.5 In response to the reference by the Applicant to Schedule 6 to the Bank of Uganda Procurement and Disposal Manual 2017 (**Categorisation of Bank of Uganda Procurements and Disposals Pursuant to the Amendment to the PPDA Act**) which contains the categorisation of the Applicant's procurements and disposal in exercise of its functions under Section 4 of the BoU Act (where procurement of SIEM falls), Counsel for the Respondent submitted that the BoU Manual 2017 which contains the said Schedule 6 has never been accredited by the Respondent, hence any procurement or disposal activity conducted under that Manual is null and void.
- 6.6 In rejoinder to the submission of Counsel for the Respondent that the SIEM solution cannot be categorised as an exercise of any of the Applicant's functions under Section 4 of the BoU Act and therefore, the impugned procurement should have been undertaken in accordance with the PPDA Act, 2003, an officer of the Applicant during the hearing explained that the details of exempted procurements and disposals are contained in Schedule 6 to the Manual; and that the SIEM falls under Schedule 6 *'Item 4: IT and Payments Operations namely; Supply and maintenance of specialised IT systems for Central Banking Operations e.g. RTGS, CSD, SWIFT, EFT and related information security systems (disaster recovery and business resumption), Security systems or any service related to Bank of Uganda Network'*
- 6.7 In rejoinder to the submission of Counsel for the Respondent that the BoU Manual 2017 which contains the said Schedule 6 has never been accredited by the Respondent, hence it is null and void and any procurement or disposal conducted under that Manual is null and void, the Applicant's officer explained that the Respondent does not have to accredit a Manual that is providing for procurements and disposals of the Bank in exercise of its functions under section 4 of the Bank of Uganda, Cap 51 because when the Bank is carrying out those functions, it is not a PDE within the meaning of section 3 of the PPDA Act, and therefore the PPDA Act does not apply to it. She referred to the Respondent's letter dated 24th July 2015, where in reference to *'New Schedule detailing the Bank of Uganda core and non-core procurements and disposals as provided for in the Bank of Uganda Act'*, the Respondent stated thus *'this is not an area for accreditation. It is an administrative matter'*.
- 6.8 She further explained that the BoU Manual 2017 is not an 'alternative procurement system' within the meaning of section 40A of the PPDA Act, for

the Manual to be accredited by the Respondent. Asked by the Tribunal whether the BoU Manual 2017 was a subsidiary law made under the PPDA Act, the officer stated that the Manual is not subsidiary to the PPDA Act; that it contains the Applicant's policies on procurement and disposal; it is made by the Applicant in exercise of its functions. Asked further by the Tribunal whether the BoU Act mandates the Bank to develop and issue its own Regulations and standard solicitation document, the Bank Official responded in the negative.

7.0 RESOLUTION OF PRELIMINARY OBJECTION

- 7.1 In resolving the preliminary objection, the Tribunal considered section 91 I (3) of the PPDA Act which provides that in addition to subsections (1) and (2), the Tribunal has power to review a decision of the Authority where an application is properly made to the Tribunal by a procuring and disposing entity or by any person whose rights are adversely affected by a decision made by the Authority (emphasis ours).
- 7.2 The Tribunal was persuaded by the submission of the Applicant that it submitted to the jurisdiction of the Tribunal in the capacity of a person aggrieved by a decision of the Authority under section 91 I (3) of the PPDA Act, 2003. The Respondent in its decision dated 10th January 2020 nullified the procurement process undertaken by the Applicant in respect to the SIEM on account that the BoU Manual 2017 under which the impugned procurement was made was null and void. The Tribunal finds that the Applicant was aggrieved by that decision and has therefore rightly applied for a review of that decision as an aggrieved person under section 91I (3) of the PPDA Act, 2003.
- 7.3 The Tribunal also considered the weight of the issues raised by the Application as being very significant, in defining the future relationship between the Applicant and the Respondent as a procurement regulatory authority, in respect to procurement and disposal functions by the Applicant in exercise of its powers under section 4 of the Bank of Uganda Act, Cap 51. The issues raised warranted deliberation by both the Applicant and the Respondent and adjudication by the Tribunal.

For the above reasons, the preliminary objection is overruled.

8.0 RESOLUTION OF ISSUES

Whether the procurement of a Security Information and Events Management Solution (SIEM) software falls within the ambit of the Applicant's functions under section 4 of the Act.

- 8.1 On this issue, the decision of the Respondent dated 10th January 2020, issued to Mantra Technologies Limited in joint venture with IS D.O.O was *'reference to section 4 of the Bank of Uganda Act, Cap 51 was not applicable in the context of the procurement.*
- 8.2 Section 2(1) of the PPDA Act (**Application of the Act**), provides that the Act shall apply to all public procurement and disposal activities and in particular shall apply to: (c) procurement and disposal by a procuring and disposing entity, within or outside Uganda. It is clear from this section that the PPDA Act, 2003 applies to the Applicant when it is conducting its procurement and disposing activities. However, under section 3 of the PPDA Act, 2003 (**Interpretation**), a "procuring and disposing entity" is defined to include (h) Bank of Uganda except in exercise of the functions specified in section 4 of the Bank of Uganda Act (emphasis ours). Section 3(h) of the PPDA Act thus exempts the Applicant from PDE status, and consequently from the application of the PPDA Act, when the Applicant is performing functions under section 4 of the Bank of Uganda Act.
- 8.3 To understand the functions of the Applicant that are exempted from the application of the PPDA Act, section 4 of the Bank of Uganda Act Cap 51 is reproduced for ease of reference:
- '4. Functions of the bank.**
- (1) *The functions of the bank shall be to formulate and implement monetary policy directed to economic objectives of achieving and maintaining economic stability.*
- (2) *Without prejudice to the generality of subsection (1), the bank shall—*
- (a) *maintain monetary stability;*
 - (b) *maintain an external assets reserve;*
 - (c) *issue currency notes and coins;*
 - (d) *be the banker to the Government;*
 - (e) *act as financial adviser to the Government and manager of public debt;*
 - (f) *advise the Government on monetary policy as is provided under*

section 32(3);

(g) where appropriate, act as agent in financial matters for the Government;

(h) be the banker to financial institutions;

(i) be the clearinghouse for cheques and other financial instruments for financial institutions;

(j) supervise, regulate, control and discipline all financial institutions and pension funds institutions;

(k) where appropriate, participate in the economic growth and development programmes.'

- 8.4 The Tribunal finds that the functions detailed in section 4 are high level functions. It is not plausible to expect that any procurement or disposal function or activity to be carried out by the Applicant must be specified in section 4 of the BoU Act for such function or activity to be exempt from the PPDA Act, 2003 in accordance with section 3(h) of the PPDA Act. It is the Tribunal's view that subsidiary legal instruments are required to define any procurements or disposals to be carried out by the Applicant in exercise of the enumerated functions.
- 8.5 It appears that Schedule 6 to the BoU Manual 2017 was an attempt by the Bank of Uganda to define the procurement activities carried out in exercise of the Bank's functions under section 4, and which are therefore outside the application of the PPDA Act.
- 8.6 In resolving the issue, *whether the procurement of a Security Information and Events Management Solution (SIEM) software falls within the ambit of the Applicant's functions under section 4 of the Act*, the Tribunal considered the legality of the BoU Manual, of which the Schedule 6, Item 4 (IT and Payment Operations) forms a part, vis a vis the PPDA Act, which was nullified by the Respondent in its decision dated 10th January 2020, a decision that the Applicant wishes the Tribunal to review. The Tribunal was not provided with information or expert advice to enable it resolve the contention between the Applicant and the Respondent with one saying the SIEM falls under section 4 of the Bank of Uganda Act while the other contends it does not fall under functions specified under section 4 of the Bank of Uganda Act. Counsel for both parties did not present evidence or submit on how they each arrived at the assertion that the SIEM falls under section 4 or it does not. The Tribunal is of the view that this issue will be resolved by considering the legality, or otherwise, of the BoU Manual.
- 8.7 A close scrutiny of the BoU Manual 2017 shows that the Manual 're-enacts' a

number of the provisions of the PPDA Act, 2003, with modifications in some areas to suit the Bank's circumstances. A few examples shall suffice.

- (a) While the Act defines Accounting officer as an Accounting Officer appointed as such by the Secretary to the Treasury; a person appointed under an Act of Parliament or under an instrument of appointment made under an Act of Parliament, including the Companies Act, to perform the functions of Accounting Officer of a procuring and disposing entity; or a person appointed to perform the functions of Accounting Officer of an entity not being of Government, to which section 2(1)(d) applies, the BoU Manual defines Accounting Officer as the Governor Bank of Uganda and the Deputy Governor Bank of Uganda, as alternate;
- (b) While the Act in section 27(2) on composition of contracts committee, provides inter alia, that the members of the contracts committee shall be nominated by the Accounting officer, approved by the Secretary to the Treasury and appointed by the Accounting Officer, the BoU Manual 2017 at paragraph 9 has dropped this provision, and makes no reference to how members of the contracts committee shall be appointed;
- (c) The BoU Manual at Paragraph 38 has given its Accounting Officer power to suspend a provider, yet the power to suspend providers under the PPDA Act (section 94) is given to the Authority;
- (d) Part VII (Administrative Review) of the BoU Manual has modified Part VII and VIIA (Administrative Review) of the PPDA Act. While Part VII and VIIA of the PPDA Act provide an aggrieved bidder with a right to appeal the decision of an accounting officer to the Authority and thereafter to the Tribunal, where necessary (*section 91 and 91I*), under Part VII of the BoU Manual, paragraphs 344-347) the right of an aggrieved bidder to appeal the decision of the Accounting officer to the Authority and to the Tribunal of the Bank of Uganda has been removed.

8.8 The Constitution of Uganda under article 79 (**Functions of Parliament**) gives power to Parliament to make laws on any matter for the peace, order, development and good governance of Uganda. Parliament routinely delegates its power to make laws to Ministers or other bodies through the making of Regulations, but such delegation must be clearly stated in an Act of Parliament. Parliament has enacted the PPDA Act 2003 to regulate public procurement and disposal and has established PPDA as the Regulatory authority to enforce compliance of the PPDA Act. No other body, including the

Bank of Uganda can make a law (by whatever name called) to alter the provisions of a parent Act such as the PPDA Act, to suit its circumstances simply because section 3(h) of the PPDA Act provides that the Act will not apply to certain functions by the Bank of Uganda.

- 8.9 It is the view of the Tribunal that if Parliament intended that a separate law should be enacted to govern Bank of Uganda procurement and disposal in exercise of its functions under section 4 of the Bank of Uganda Act, the PPDA Act should have guided so, as it did in a number of procurements for certain institutions such as the Auditor General (section 2(1b)); procurement of medicines (section 40A(6) and procurement and disposal by Defence and National Security organs (section 42). If we view this as a lacuna by Parliament, this lacuna cannot be cured by Bank of Uganda drafting a Manual to alter the provisions of the PPDA Act to suit its peculiar circumstances, for to do so would tantamount to altering a Parent law on procurement passed by Parliament.
- 8.10 The Tribunal therefore finds that the Bank of Uganda Manual is ultra vires the PPDA Act, 2003, and is therefore null and void to the extent of the inconsistency. Schedule 6 to the said Manual which specifies the exempt procurements has been affected by the illegality of most of the provisions of the Manual and cannot therefore be relied upon as clearly defining procurements that are exempt under section 4 of the Bank of Uganda Act.
- 8.11 The Tribunal is of the view that section 3(h) of the Act which exempts the Bank of Uganda from PDE status cannot be read in isolation of section 7(1) of the PPDA Act. Section 7(1) provides that the functions of the Authority include advising Central Government, local governments and other PDEs on all public procurement and disposal policies, principles and practices. The Bank of Uganda, being a Central Government entity, whether it is a PDE in some instances and not a PDE in others, is subject to the jurisdiction of the PPDA, in as far as advising it on its procurement policies, principles and practices are concerned. In coming up with the exempt list under Schedule 6 to the BoU Manual, specifically that the procurement of SIEM falls within the exempt list, the Bank of Uganda should have sought the advice of the PPDA. Had this been done, this dispute as to whether the SIEM falls within section 4 of the Bank of Uganda Act may not have arisen.

It is also the view of the Tribunal that until Parliament makes a separate law to regulate Bank of Uganda procurements referred to under section 3(h) of the PPDA Act, (if that was the intention of Parliament), Bank of Uganda as a Central Government institution falls under the jurisdiction of the Authority when the Authority is exercising its functions under section 7(1), specifically (1) (a) and (b) of the PPDA Act i.e. *'(a) advising Central Government, local governments and other PDEs on all public procurement and disposal policies, principles and practices and (b) monitor and report on the performance of the public procurement and disposal systems in Uganda and advise on desirable changes'*. The Authority should, in liaison with the Bank of Uganda, come up with detailed regulations on how to regulate Bank of Uganda procurements and disposals in exercise of the Bank's functions under section 4 of the Bank of Uganda Act in accordance with section 96(1) of the PPDA Act, 2003.

9.0 DECISION OF THE TRIBUNAL

1. The preliminary objection is overruled.
2. The Application is dismissed.
3. The decision of the Authority is affirmed.
4. Until Parliament enacts a law to regulate procurement and disposal activities of the Bank of Uganda carried out in exercise of its functions under section 4 of the Bank of Uganda Act, Cap 51, the Authority is directed to liaise with the Bank of Uganda to propose Regulations to be issued by the Minister of Finance Planning and Economic Development under Section 96(1) of the PPDA Act, 2003, to regulate procurement and disposal activities of the Bank under Section 4 of the Bank of Uganda Act Cap 51.
5. Each party to bears its own costs.

SIGNED and Sealed this 6th January, 2020 by;

1. OLIVE ZAALE OTETE

]
CHAIRPERSON

2. ABRAHAM NKATA

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MEMBER

3. DAVID KABATERAINE

]
MEMBER

4. ENG. THOMAS BROOKES ISANGA]

MEMBER