LOCAL CONTENT VERIFICATION PROCESS

DESMOND GOVENDER
GM: LOCAL CONTENT
28 August 2013
CONTENTS

1. SABS
2. LOCAL CONTENT VERIFICATION PROCESS
3. CURRENT PROJECTS
OUR SERVICES

STANDARDS
- Founding member of ISO
- Remains the only organisation in South Africa that has a direct relationship with ISO – SABS is ISO South Africa
- Maintain over 6500 SANS
- Focussing on relevance

TRAINING
- Fully equipped and accredited training centre
- Training against standards
- Understanding and application of standards in various industries
OUR SERVICES

CERTIFICATION
Famous ISO 9000, 14000 system certification schemes
Product certification - consumers confidence

TESTING
Over 90 different tests
Conformance against standards
Expectation from industry for the Bureau to be in a position to test every product in the market
Unique infrastructure and capacity
Necessary to lock into foreign markets and lock out low quality products
SYSTEM CERTIFICATION – MANAGEMENT SYSTEMS

- ISO 9001
  QUALITY MANAGEMENT SYSTEMS
- ISO 14001
  ENVIRONMENTAL
- OHSAS 18001
  OCCUPATIONAL HEALTH AND SAFETY
- ISO 22001
  FOOD SAFETY
- HACCP
  FOOD HYGIENE
- ISO TS 16949
  AUTOMOTIVE
- ISO 27001
  INFORMATION SECURITY
- SANS 16001
  HIV/AIDS
- ISO 13485
  MEDICAL DEVICES
PRODUCT CERTIFICATION –
SABS MARK SCHEME

- Certification of a product is a means of providing assurance that it complies with specified standards.
- Our SABS mark scheme is a highly recognizable symbol of credibility and a powerful marketing tool.
- The use of the SABS mark on a product strengthens point-of-sale impact and gives it greater prestige in the market place.
- Synonymous with quality, reliability and dependability.
<table>
<thead>
<tr>
<th>LABORATORY</th>
<th>LABORATORY SERVICES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Materials and Mechanical</td>
<td>Building construction, Fibres &amp; Polymers, Fluid &amp; Technology, Mechanical &amp; Packaging</td>
</tr>
<tr>
<td>Food and Health</td>
<td>Food chemistry, Pesticide chemistry, Pharmaceutical chemistry, Food microbiology, Radiation, Condom lab, Water analysis</td>
</tr>
<tr>
<td>Electro Technical</td>
<td>Electronics, Appliances, Lightning, Explosion prevention, National Electrical Test Facility</td>
</tr>
<tr>
<td>Automotive and Transportation</td>
<td>Vehicle components, vehicle systems, emissions and noise, battery testing</td>
</tr>
<tr>
<td>Chemical</td>
<td>Industrial chemistry and petroleum, Rubber and plastics, Paints and sealants</td>
</tr>
<tr>
<td>Mining and Minerals</td>
<td>Coal analysis, Iron ore, Petrography, Minerals laboratory</td>
</tr>
</tbody>
</table>
SABS TRAINING SERVICES

PROVIDES TRAINING IN:

- QUALITY MANAGEMENT ISO 9001 SERIES
- ENVIRONMENTAL MANAGEMENT ISO 14001 SERIES
- OHSAS 18001 SERIES
- HACCP SANS 10330 SERIES
- INFORMATION SECURITY MANAGEMENT SYSTEM ISO 27001 SERIES
- LOCAL CONTENT VERIFICATION (PUBLIC PROCUREMENT OFFICER REQUIREMENTS)
LOCAL CONTENT VERIFICATION AGENCY

- AMENDMENTS TO THE PPPFA – LOCAL CONTENT REQUIREMENTS
- SABS APPOINTED LOCAL CONTENT VERIFICATION AGENCY BY the dti IN SEPTEMBER 2012
- PROVIDE TRAINING OF LOCAL CONTENT REQUIREMENTS SATS 1286 – PROVINCIAL SUPPLY CHAIN, AGENCIES AND MUNICIPALITIES
- ASSIST SUPPLY CHAIN WITH ENSURING ADHERENCE TO MINIMUM NATIONAL STANDARDS AND SPECIFICATIONS IN THE DRAFTING OF TENDER SPECIFICATIONS - QUALITY PRODUCTS
## LCV - Designated Sectors

<table>
<thead>
<tr>
<th>Industry/Sector/Sub-Sector</th>
<th>Minimum Threshold for Local Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Textile, Clothing, Leather and Footwear</td>
<td>100%</td>
</tr>
<tr>
<td>School Furniture</td>
<td>100%</td>
</tr>
<tr>
<td>Office Furniture</td>
<td>80%</td>
</tr>
<tr>
<td>Canned / Processed Vegetables</td>
<td>80%</td>
</tr>
<tr>
<td>Pharmaceutical Products</td>
<td>73%</td>
</tr>
<tr>
<td>Buses (Bus Body)</td>
<td>80%</td>
</tr>
<tr>
<td>Power Pylons</td>
<td>100%</td>
</tr>
<tr>
<td>Rolling Stock</td>
<td>65%</td>
</tr>
<tr>
<td>Power Cables</td>
<td>80%</td>
</tr>
<tr>
<td>Solar Water Heater Components</td>
<td>70%</td>
</tr>
<tr>
<td>Set-Top Boxes for TV Digital Migration</td>
<td>30%</td>
</tr>
</tbody>
</table>
LOCAL CONTENT VERIFICATION PROCESS FLOW

- INFORMATION FORWARDED TO SABS
- QUOTATION PROCESS – SCOPING OF WORK
- VERIFICATION AUDIT PROCESS
- APPROVAL BOARD – VERIFICATION DECISION
- CERTIFICATE CREATION
- DATA BASE ENTRY AND MAINTENANCE
LOCAL CONTENT VERIFICATION PROCESS FLOW

- INFORMATION, SBD OR MBD 6.2 DOCUMENTATION FORWARDED TO SABS
- WINNING BID INFORMATION CAN BE ROUTED TO SABS VIA: DROP BOX ON the dti WEBSITE
LOCAL CONTENT VERIFICATION PROCESS FLOW

- SCOPING OF THE VERIFICATION PROCESS SABS, the dti and state owned organisation
- QUOTATION FORWARDED TO WINNING BIDDER
LOCAL CONTENT VERIFICATION PROCESS FLOW

• AUDIT IS PLANNED AS PER THE ORGANIZATION SCHEDULE AT LEAST THREE WEEKS IN ADVANCE
• VERIFICATION AUDIT PROCESS FOR INITIAL TENDER AND SURVEILLANCE
LOCAL CONTENT VERIFICATION PROCESS FLOW

- VERIFICATION AUDIT CONDUCTED IN TWO PARTS:
  - ✔ VERIFICATION OF THE DOCUMENTATION TO ENSURE LOCAL CONTENT IS AS PER THE DESIGNATED REQUIREMENT.
  - ✔ FACTORY SHOP FLOOR TECHNICAL VERIFICATION OF THE LOCAL CONTENT AS DESCRIBED IN THE DOCUMENTATION VERIFIED ABOVE

- THE AUDIT WILL CONSIST OF AT LEAST TWO TIERS AT THE FINAL ASSEMBLY LEVEL AND SUB-ASSEMBLY LEVEL DEPENDING ON THE DISCUSSIONS WITH the dti OR RELEVANT STATE ORGANISATION.
LOCAL CONTENT VERIFICATION PROCESS FLOW

• AUDIT TEAM Prepares Audit Report
• Audit Report Will Contain
  ✓ Audit Trail of Information & Documentation Verified
  ✓ Conclusion With Respect To The Verification Process Against The Designated Sector
\[ LC = \left( 1 - \frac{X}{Y} \right) \times 100 \]
LOCAL CONTENT VERIFICATION PROCESS FLOW

APPROVALS:

- STANDARD SABS APPROVALS PROCESS FOLLOWED INDEPENDENT OF THE AUDIT TEAM.
- APPROVAL PROCESS WILL MINUTE THE DECISION OF APPROVAL OF EITHER COMPLIANCE OR NON-CONFORMANCE AGAINST THE DESIGNATED SECTOR.
CERTIFICATE:

- APPROVAL BOARD WILL MINUTE THE DECISION OF APPROVAL OF EITHER COMPLIANCE OR NON-
  CONFORMANCE AS DEPICTED IN THE REPORT AGAINST THE DESIGNATED SECTOR.

- IF ORGANIZATION IS IN COMPLIANCE - CERTIFICATE IS CREATED AND ROUTED TO THE ORGANIZATION

- IF ORGANIZATION IS IN NON-COMPLIANCE - A NON-
  CONFORMANCE REPORT WILL BE ROUTED TO THE ORGANIZATION, NATIONAL TRESUARY, the dti & ORGANISATION OF STATE
LOCAL CONTENT VERIFICATION PROCESS FLOW

DATABASE ENTRY:

- APPROVAL BOARD MINUTES AND CERTIFICATE WILL TRIGGER THE DATABASE ENTRY
- DATABASE WILL CONTAIN ALL THE RELEVANT INFORMATION AS PER THE CERTIFICATE
- ON LINE ACCESS FOR ALL ORGANS OF STATE
- ONCE THE CERTIFICATE HAS EXPIRED – DATABASE INFORMATION IS UPDATED ACCORDINGLY
CURRENT PROJECTS

- TRAINING OF PROCUREMENT OFFICERS – ECONOMIC DEVELOPMENT GAUTENG & ESKOM SUPPLIER DEVELOPMENT & LOCALISATION TEAM.
- WORKSHOPS WITH TRANSNET FOR ROLLING STOCK SECTORS
- LOCAL CONTENT VERIFICATION PROCESS SCOPING COMPLETED FOR BUS BODIES – BRT JOHANNESBURG
CURRENT PROJECTS

- LOCAL CONTENT VERIFICATION PROCESS SCOPING COMPLETED FOR TEXTILE SECTORS
- VOLUNTARY LOCAL CONTENT VERIFICATION EXPLORED WITH PRIVATE SECTOR ON NON-DESIGNATED PRODUCTS
SOLAR WATER HEATER COMPONENTS:

1. Tank consisting of the inner tank, outer tank and insulation. (Stainless Steel, type 304 inner tank 304(SANS 151:2012))

2. Frame including the spreader beams. (SANS 1307:2012)

3. Filler tank with the float valve (Float valves SANS 752:2009)

4. Evacuated Tube collectors/Flat plate collectors (Flat Plate includes copper risers, insulation material, glass) (SANS 1307:2012)

5. The tempering valve (SANS 1299:2012)

SOLAR WATER HEATER COMPONENTS:

HIGH PRESSURE SYSTEM

1. Solar water heater system including collector tanks either evacuated tubes or flat plate collectors. (SANS 1307:2012)

2. The tanks consisting of the inner tank, outer tank, insulation, heating element, sacrificial anode. (SANS 151:2012)

3. Heating Element (SANS 513:2009)


5. The timer to regulate the heating element.

6. The pressure control valves, safety valves, vacuum breakers (ALL SANS 198:2012)

### Annex C

**Local Content Declaration - Summary Schedule**

- **Tender No.**: GP 00111
- **Tender description**: 30 and 60 Seater commuter buses
- **Designated product(s)**: Buses
- **Tender Authority**: Gauteng Purchasing Department
- **Tendering Entity name**: Unibody Bus Builders (Pty) Ltd
- **Tender Exchange Rate**: Pula EU GBP

#### Calculation of local content

<table>
<thead>
<tr>
<th>Tender item no's</th>
<th>List of items</th>
<th>Tender price - each (excl VAT)</th>
<th>Exempted imported value per unit</th>
<th>Tender value net of exempted imported content</th>
<th>Imported value</th>
<th>Local value</th>
<th>Local content % (per item)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GP 00010</td>
<td>30 Seater commuter bus</td>
<td>R 250 000</td>
<td>R 96 000</td>
<td>R 154 000</td>
<td>R 25 000</td>
<td>R 129 000</td>
<td>84%</td>
</tr>
<tr>
<td>GP 00011</td>
<td>60 Seater commuter bus</td>
<td>R 400 000</td>
<td>R 180 000</td>
<td>R 220 000</td>
<td>R 31 000</td>
<td>R 189 000</td>
<td>86%</td>
</tr>
</tbody>
</table>

#### Tender summary

- **Tender Qty**: (C16) 400, (C17) 200
- **Total tender value**: (C10x16) R 100 000 000, (C10x17) R 80 000 000
- **Total exempted imported content**: (C1x18) R 38 400 000, (C1x19) R 10 000 000
- **Total Imported content**: (C10x16) R 61 600 000

**Note:** VAT to be excluded from all calculations.

- **Total tender value**: R 180 000 000
- **Total Exempt imported content**: R 74 400 000
- **Total Imported content**: R 16 200 000
- **Total local content (C22-C23)**: R 89 400 000
- **Average local content % of tender (C24/C22)**: 84.66%

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**Signature of tenderer from Annex B**
**Annex E**

**Local Content Declaration - Supporting Schedule to Annex C**

<table>
<thead>
<tr>
<th>Local Products (Goods, Services and Works)</th>
<th>Description of items purchased</th>
<th>Local suppliers</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(E6)</td>
<td>(E7)</td>
<td>(E8)</td>
</tr>
<tr>
<td>Sheet Steel</td>
<td>Arcelor</td>
<td>R 34 000 000</td>
<td></td>
</tr>
<tr>
<td>Fabric for seats</td>
<td>Galvenor Textiles</td>
<td>R 7 750 000</td>
<td></td>
</tr>
<tr>
<td>Fabric for headlinings</td>
<td>Galvenor Textiles</td>
<td>R 1 250 000</td>
<td></td>
</tr>
<tr>
<td>Welding consumables</td>
<td>ABR Supplies</td>
<td>R 250 000</td>
<td></td>
</tr>
<tr>
<td>Tyres and wheels</td>
<td>Dunlop</td>
<td>R 1 000 000</td>
<td></td>
</tr>
<tr>
<td>Hardware items (nuts, bolts, rivets, etc)</td>
<td>Various Local Suppliers</td>
<td>R 500 000</td>
<td></td>
</tr>
<tr>
<td>Laser cutting services</td>
<td>Red Hot Cutting</td>
<td>R 245 000</td>
<td></td>
</tr>
<tr>
<td>Other goods and services (small items)</td>
<td>Various</td>
<td>R 5 000</td>
<td></td>
</tr>
</tbody>
</table>

**Total local products (Goods, Services and Works)**

(9) Total local products (Goods, Services and Works) R 45 000 000 50%

**Manpower costs** (Tenderer’s manpower cost)

(E10) Manpower costs

| Tenderer’s manpower cost | R 20 000 000 22% |

**Factory overheads** (Rental, depreciation & amortisation, utility costs, consumables etc.)

(E11) Factory overheads

| Rental, depreciation & amortisation, utility costs, consumables etc. | R 15 000 000 17% |

**Administration overheads and mark-up** (Marketing, insurance, financing, interest etc.)

(E12) Administration overheads and mark-up

| Marketing, insurance, financing, interest etc. | R 9 400 000 11% |

**Total local content**

(E13) Total local content R 89 400 000 100%

Note: VAT to be excluded from all calculations.

**Description of items purchased**

- Sheet Steel
- Fabric for seats
- Fabric for headlinings
- Welding consumables
- Tyres and wheels
- Hardware items (nuts, bolts, rivets, etc)
- Laser cutting services
- Other goods and services (small items)

**Note:** This total must correspond with Annex C - C24.
# Annex D

## Imported Content Declaration - Supporting Schedule to Annex C

### B. Imported directly by the Tenderer

<table>
<thead>
<tr>
<th>Tender item no's</th>
<th>Description of imported content</th>
<th>Unit of measure</th>
<th>Overseas Supplier</th>
<th>Foreign currency value as per Commercial Invoice</th>
<th>Tender Rate of Exchange</th>
<th>Local value of imports</th>
<th>Freight costs to port of entry</th>
<th>All locally incurred landing costs &amp; duties</th>
<th>Total landed cost excl VAT</th>
</tr>
</thead>
<tbody>
<tr>
<td>(D20)</td>
<td>GP 0010 Instrumentation</td>
<td>Each</td>
<td>Gearmax USA</td>
<td>$2 000</td>
<td>R 7.00</td>
<td>R 14 000</td>
<td>R 1 500</td>
<td>R 250</td>
<td>R 16 250</td>
</tr>
<tr>
<td>(D21)</td>
<td>GP 0011 Air conditioner</td>
<td>Each</td>
<td>Benteler Ger</td>
<td>€550</td>
<td>R 9.00</td>
<td>R 4 500</td>
<td>R 1 000</td>
<td>R 500</td>
<td>R 6 000</td>
</tr>
<tr>
<td>(D22)</td>
<td>GP 0011 Instrumentation</td>
<td>Each</td>
<td>Gearmax USA</td>
<td>$3100</td>
<td>R 7.00</td>
<td>R 21 700</td>
<td>R 1 750</td>
<td>R 800</td>
<td>R 24 250</td>
</tr>
<tr>
<td>(D23)</td>
<td>GP 0011 Air conditioner</td>
<td>Each</td>
<td>Benteler Ger</td>
<td>€550</td>
<td>R 9.00</td>
<td>R 4 950</td>
<td>R 1 250</td>
<td>R 600</td>
<td>R 6 800</td>
</tr>
</tbody>
</table>

**Calculation of imported content**

- **Total imported value by tenderer**: R 15 110 000

### C. Imported by a 3rd party and supplied to the Tenderer

<table>
<thead>
<tr>
<th>Description of imported content</th>
<th>Unit of measure</th>
<th>Local supplier</th>
<th>Overseas Supplier</th>
<th>Foreign currency value as per Commercial Invoice</th>
<th>Tender Rate of Exchange</th>
<th>Local value of imports</th>
<th>Freight costs to port of entry</th>
<th>All locally incurred landing costs &amp; duties</th>
<th>Total landed cost excl VAT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheet steel</td>
<td>tonne</td>
<td>Arcelor SA</td>
<td>Arcelor Belgium</td>
<td>€550</td>
<td>R 9.00</td>
<td>R 4 500</td>
<td>R 500</td>
<td>R 800</td>
<td>R 5 900</td>
</tr>
<tr>
<td>Hinges</td>
<td>each</td>
<td>Ramsay SA</td>
<td>Ringus GB</td>
<td>€25.00</td>
<td>R 12.00</td>
<td>R 600</td>
<td>R 5</td>
<td>R 75</td>
<td>R 1 200</td>
</tr>
<tr>
<td>Steel tubing</td>
<td>tonne</td>
<td>Mac Steel</td>
<td>TEC - UK</td>
<td>€2500</td>
<td>R 12.00</td>
<td>R 6 000</td>
<td>R 45</td>
<td>R 6 345</td>
<td>R 25 380</td>
</tr>
<tr>
<td>Other - nuts and bolts</td>
<td>each</td>
<td>Mac Steel</td>
<td>TEC - UK</td>
<td>value too small to itemise</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Calculation of imported content**

- **Total imported value by 3rd party**: R 597 000

### D. Other foreign currency payments

<table>
<thead>
<tr>
<th>Type of payment</th>
<th>Local supplier</th>
<th>Overseas beneficiary</th>
<th>Foreign currency value paid</th>
<th>Tender Rate of Exchange</th>
</tr>
</thead>
<tbody>
<tr>
<td>Royalty payment for use of patent</td>
<td>Unibody</td>
<td>Dian USA</td>
<td>$10 000</td>
<td>R 7.00</td>
</tr>
<tr>
<td>Annual licence fees - pro-rated</td>
<td>Unibody</td>
<td>MB - Germany</td>
<td>€ 35 000</td>
<td>R 9.00</td>
</tr>
<tr>
<td>Engineering support</td>
<td>SABS</td>
<td>MB - Germany</td>
<td>€ 12 000</td>
<td>R 9.00</td>
</tr>
</tbody>
</table>

**Calculation of foreign currency payments**

- **Total of foreign currency payments declared by tenderer and/or 3rd party**: R 137 050

**Summary**

- **Total of imported content & foreign currency payments - (B22), (C41) & (D32)**: R 16 200 000

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*Note: VAT to be excluded from all calculations*

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This total must correspond with Annex C - C 23
# Annex D

## Imported Content Declaration - Supporting Schedule to Annex C

<table>
<thead>
<tr>
<th>Tender No.</th>
<th>Tender description:</th>
<th>Designated Products:</th>
<th>Tender Authority:</th>
<th>Tendering Entity name:</th>
<th>Exchange Rate:</th>
<th>EU</th>
<th>GBP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pula</td>
<td>R 3.00</td>
<td>R 12.00</td>
</tr>
</tbody>
</table>

**Note:** VAT to be excluded from all calculations

## A. Exempted imported content

<table>
<thead>
<tr>
<th>Tender item no's</th>
<th>Description of imported content</th>
<th>Local supplier</th>
<th>Overseas Supplier</th>
<th>Foreign currency value as per Commercial Invoice</th>
<th>Tender Exchange Rate</th>
<th>Local value of imports</th>
<th>Freight costs to port of entry</th>
<th>All locally incurred landing costs &amp; duties</th>
<th>Total landed cost excl VAT</th>
<th>Total exempt imported value</th>
</tr>
</thead>
<tbody>
<tr>
<td>(D7)</td>
<td>(D8)</td>
<td>(D9)</td>
<td>(D10)</td>
<td>(D11)</td>
<td>(D12)</td>
<td>(D13)</td>
<td>(D14)</td>
<td>(D15)</td>
<td>(D16)</td>
<td>(D17)</td>
</tr>
</tbody>
</table>

| Total exempt imported value | R 0.0 |

This total must correspond with Annex C - C.21
### B. Imported directly by the Tenderer

<table>
<thead>
<tr>
<th>Tender item no’s</th>
<th>Description of imported content</th>
<th>Unit of measure</th>
<th>Overseas Supplier</th>
<th>Foreign currency value as per Commercial Invoice</th>
<th>Tender Rate of Exchange</th>
<th>Local value of imports</th>
<th>Freight costs to port of entry</th>
<th>All locally incurred landing costs &amp; duties</th>
<th>Total landed cost excl VAT</th>
</tr>
</thead>
<tbody>
<tr>
<td>(D20)</td>
<td>(D21)</td>
<td>(D22)</td>
<td>(D23)</td>
<td>(D24)</td>
<td>(D25)</td>
<td>(D26)</td>
<td>(D27)</td>
<td>(D28)</td>
<td>(D29)</td>
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<td>(D32)</td>
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<td>(D30)</td>
</tr>
</tbody>
</table>

#### Calculation of imported content

- Tender Qty
- Total imported value

#### Summary

- Tender Qty
- Total imported value

(D32)Total imported value by tenderer
### C. Imported by a 3rd party and supplied to the Tenderer

<table>
<thead>
<tr>
<th>Description of imported content</th>
<th>Unit of measure</th>
<th>Local supplier</th>
<th>Overseas Supplier</th>
<th>Foreign currency value as per Commercial Invoice</th>
<th>Tender Rate of Exchange</th>
<th>Local value of imports</th>
<th>Freight costs to port of entry</th>
<th>All locally incurred landing costs &amp; duties</th>
<th>Total landed cost excl VAT</th>
<th>Total imported value by 3rd party</th>
</tr>
</thead>
<tbody>
<tr>
<td>(D33)</td>
<td>(D34)</td>
<td>(D35)</td>
<td>(D36)</td>
<td>(D37)</td>
<td>(D38)</td>
<td>(D39)</td>
<td>(D40)</td>
<td>(D41)</td>
<td>(D42)</td>
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<table>
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<tr>
<th>Calculation of imported content</th>
<th>Summary</th>
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<td>Quantity imported</td>
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(R 0)
### D. Other foreign currency payments

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<th>Type of payment</th>
<th>Local supplier making the payment</th>
<th>Overseas beneficiary</th>
<th>Foreign currency value paid</th>
<th>Tender Rate of Exchange</th>
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<td>(D47)</td>
<td>(D48)</td>
<td>(D49)</td>
<td>(D50)</td>
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</tbody>
</table>

**Calculation of foreign currency payments**

**Summary of payments**

- Local value of payments: (D51)

- (D52) Total of foreign currency payments declared by tenderer and/or 3rd party

- (D53) Total of imported content & foreign currency payments: (D32), (D45) & (D52) above

Date: __________________________

Signature of tenderer from Annex B

This total must correspond with Annex C - C 23