Exchange Control Department

2006-06-27

Exchange Control Circular No. 13/2006

Auditors’ limited assurance report on import and/or export transactions of companies granted Exchange Control dispensation

Authorised Dealers are referred to Sections B.1(F) and B.18(F) of the Exchange Control Rulings and advised that the adoption by South Africa of the International Standards on Assurance Engagements (ISAE 3000), *Assurance Engagements other than Audits or Reviews of Historical Financial Information*, with effect from 2005-01-01, has necessitated a change in the form of the report that may be issued by auditors when expressing a limited level of assurance to Exchange Control.

After consultation with the South African Institute of Chartered Accountants, the format of the annual auditors’ limited assurance report regarding the companies’ compliance with the Imports and Exports Undertakings has been finalised and incorporated in the Exchange Control Rulings.

The auditors’ limited assurance report for submission to Exchange Control becomes operative with immediate effect.

Flowing from the above, the following amendments to Sections B.1(F) and B.18(F) of the Exchange Control Rulings have been made:

**Section B.1(F)**

The entire Section has been deleted and substituted with the following:
“(F) IMPORTS UNDERTAKING DISPENSATION

(i) Exchange Control would, on application, be prepared to consider requests to grant dispensation to certain companies from the requirement to submit supporting documentation to their Authorised Dealers for every foreign exchange transaction related to an import transaction.

(ii) Where Exchange Control has granted companies the Imports Undertaking dispensation, the external auditors of the companies are required to issue a report expressing a limited level of assurance to Exchange Control.

The format of the auditors’ limited assurance report follows hereunder:

“AUDITORS’ LIMITED ASSURANCE REPORT ON IMPORT AND/OR EXPORT TRANSACTIONS OF COMPANIES GRANTED EXCHANGE CONTROL DISPENSATION

Preface

.01 The Exchange Control Department of the South African Reserve Bank (Exchange Control) has developed these guidelines in consultation with the South African Institute of Chartered Accountants (SAICA). The guidelines have been drawn up with the aim of providing guidance to registered accountants and auditors appointed as independent external auditors of companies that have been granted dispensation by Exchange Control, in terms of signed Imports and/or Exports Undertaking contracts (Undertakings) and the Exchange Control Rulings (Rulings).

.02 The auditors are required to report annually to Exchange Control regarding the companies’ compliance with the Undertakings and Rulings for import and/or export transactions conducted during the year.
The adoption by South Africa of the International Engagement Standards with effect from 2005-01-01 has necessitated a change in the form of the report that may be issued by auditors when expressing a limited level of assurance to Exchange Control.

**Introduction**

Exchange Control exempts certain companies from submitting supporting documentation to Authorised Dealers for every foreign exchange transaction relating to imports and/or exports. Authorised Dealers are responsible for complying with the Rulings, however, companies that have been granted dispensation are responsible for complying with the Undertakings and Rulings. These companies’ external auditors are required to report to Exchange Control on their compliance with the Undertakings and Rulings.

The dispensation from Exchange Control is limited to companies that have adequate systems of internal control as referred to in the Undertakings and as approved by Exchange Control.

Exchange Control has, in consultation with SAICA, developed an illustrative limited assurance report and an engagement letter with the aim of achieving consistency. These documents are provided in appendices I and II.

**Responsibilities of directors and auditors**

**Directors’ responsibilities**

Applications for dispensation are made through the companies’ lead Authorised Dealers. To apply for dispensation companies enter into Undertakings in terms of which they agree to comply with the Rulings. Both the auditors and all the Authorised Dealers with whom the companies have foreign exchange facilities are required to complete standard forms providing Exchange Control with their consent to be involved in the Undertakings.
The directors of the company that has been granted dispensation are responsible for the design, implementation and effective operation of adequate systems of control over import and/or export transactions. The directors are also responsible for the maintenance of related supporting documentation that will facilitate the prevention and detection of fraud and error and will establish policies and procedures that ensure compliance with the terms of the Undertakings and Rulings.

**Auditors’ responsibilities**

The auditors should issue an auditors’ consent in compliance with the Undertakings (Schedule V for the Imports Undertaking and Schedule VI for the Exports Undertaking). The auditors’ consent should state that the auditors are prepared to undertake the limited assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE 3000), *Assurance Engagements other than Audits or Reviews of Historical Financial Information* and to provide the limited assurance report contemplated in the Undertakings.

In terms of the consent letter, the auditors should inform Exchange Control once they cease to hold office as the entity’s auditor. The appointed external auditor(s) that report on the entity’s financial statements for a particular year are responsible for performing the limited assurance engagement.

The auditors prepare an engagement letter documenting the key terms of the appointment, including a reference to the Rulings and Undertakings. An engagement letter confirms the auditors’ acceptance of the appointment and helps avoid misunderstanding regarding such matters as the objectives and scope of the engagement, the extent of the auditors’ responsibilities, the form of report to be issued, the level of assurance to be provided and restrictions on distribution.

The limited assurance engagement is conducted in accordance with the ISAE 3000. This standard requires the auditors to comply with ethical requirements (the Codes of Professional Conduct issued by SAICA and
the Public Accountants’ and Auditors’ Board) and to plan and perform the
limited assurance engagement so that they obtain sufficient appropriate
evidence regarding the subject matter of the engagement to support the
limited assurance conclusion.

.13 If a limited assurance conclusion is expressed, the evidence gathering
procedures are more limited than they would be for a reasonable
assurance engagement and therefore less assurance is obtained than in
a reasonable assurance engagement.

.14 The engagement does not constitute an audit or review performed in
accordance with International Standards on Auditing or International
Standards on Review Engagements and consequently an audit or review
opinion is not expressed.

Subject matter

.15 The subject matter comprises the import and/or export transactions
conducted and related supporting documentation required in accordance
with the dispensation granted to the company in terms of the
Undertakings and applicable Rulings for the year reported on.

Criteria for evaluation of compliance

.16 The terms of the Undertakings and applicable Rulings comprise the
criteria by which the company’s compliance is evaluated for purposes of
the limited assurance engagement.

.17 The Undertakings and applicable Rulings do not specify an internal
control framework or specific controls over import and/or export
transactions that provide objective criteria for assessing the design,
implementation or operating effectiveness of internal controls over import
and/or export transactions.

.18 The auditors performing the limited assurance engagement are the
auditors of the company and as such have obtained an understanding of
the entity and its environment, including its internal control, as part of the
audit of the financial statements for the year reported on, sufficient to identify and assess the risks of material misstatement of the financial statements whether caused by fraud or error. Reference should be made as to whether an unqualified or modified audit opinion has been expressed on the financial statements.

.19 The impact of a modified audit opinion on the limited assurance engagement should be considered. Should the nature of the modification affect the import and/or export transactions, it may have an impact on the limited assurance conclusion.

.20 The auditors rely on information obtained during the course of the audit of the financial statements together with additional evidence obtained in the course of this limited assurance engagement in evaluating the adequacy of the internal financial controls over import and/or export transactions for the purpose of the limited assurance engagement.

Limitations

.21 As a result of the inherent limitations of a system of internal control and because of the characteristics of irregularities, including concealment through collusion and forgery, errors or fraud may not be prevented or detected and a properly designed and performed limited assurance engagement may not necessarily detect all irregularities.

.22 The procedures are conducted on a test basis and are designed and performed to provide limited assurance that the company complies with the Imports and/or Exports Undertakings and applicable sections of the Rulings. As the procedures are performed on a sample basis; even when properly performed, they may not detect all instances of non-compliance with the Rulings and Undertakings that occur.

Planning and performance of the engagement

.23 The auditors must have an appropriate understanding of the business and the internal controls of the company as well as an appreciation of the transactions incorporated into the company’s financial statements. For
this reason, the auditors that verify the company’s compliance with Exchange Control’s requirements for the import and/or export transactions must be the appointed external auditors of the company.

24 Exchange Control requires that the auditors should test that the company complies with the relevant Rulings that form an integral part of the Undertakings. The auditors should have a sound knowledge of all these Rulings as they form the criteria by which the company’s compliance with the Imports and/or Exports Undertakings will be considered in terms of the ISAE 3000.

25 It is not possible to set a standard audit programme relating to the compliance by the company with the Undertakings and Rulings that will be suitable for all situations.

Reporting and conclusion

26 A specimen auditors’ limited assurance report is provided as Appendix II. Where the auditors’ procedures reveal instances of non-compliance by the company with the Undertakings and Rulings these are included in the report.

APPENDIX I - ILLUSTRATIVE ENGAGEMENT LETTER

The Directors

[Insert name and address of company]

[Insert date]

Dear Sirs

Independent assurance engagement regarding compliance by [insert name of company] (the company) with the Imports and/or Exports Undertakings entered into with the South African Reserve Bank Exchange Control Department (Exchange Control)
This letter sets forth our understanding of the terms of our independent limited assurance engagement, and the nature and scope of the services we will provide.

**Scope of engagement**
The directors of the company are required in terms of the Imports and/or Exports Undertaking contracts, signed with the South African Reserve Bank Exchange Control Department (Exchange Control), to provide Exchange Control on an annual basis with a limited assurance report regarding compliance by the company, in respect of its import and/or export transactions conducted during the year, with the terms of the Imports and/or Exports Undertaking contracts and applicable Exchange Control Rulings.

**Directors’ responsibility**
The directors of the company are responsible for the design, implementation and effective operation of adequate systems of control over import and/or export transactions and the maintenance of related supporting documentation that facilitate the prevention and detection of fraud and error and establish policies and procedures to ensure compliance with the terms of the Imports and/or Exports Undertakings and applicable Exchange Control Rulings.

**Auditors’ responsibility**
It is our responsibility to perform our limited assurance engagement so that we are able to express our limited assurance conclusion to the directors and Exchange Control on whether the company has complied with the Imports and/or Exports Undertakings and applicable Exchange Control Rulings for the year ended [insert date], and to report on instances of non-compliance identified during our limited assurance engagement. We shall not be responsible for reporting on any import and/or export transactions beyond the period covered by our limited assurance engagement.
Our independent limited assurance engagement will be conducted in accordance with the International Standards on Assurance Engagements (ISAE 3000), Assurance Engagements other than Audits or Reviews of Historical Financial Information. This standard requires us to comply with ethical requirements and to plan and perform our limited assurance engagement with the aim of obtaining limited assurance regarding the subject matter of the engagement, expressed below. Where a limited assurance conclusion is expressed, our evidence gathering procedures are more limited than they would be for a reasonable assurance engagement, and therefore we are able to obtain less assurance than we would in a reasonable assurance engagement.

Our engagement does not constitute an audit or review performed in accordance with the International Standards on Auditing or International Standards on Review Engagements and consequently an audit or review opinion will not be expressed.

**Subject matter**
The subject matter comprises the import and/or export transactions conducted in accordance with the Imports and/or Exports Undertakings dispensation granted by Exchange Control to the company during the year ended [insert date], and related supporting documentation required in terms of the Imports and/or Exports Undertakings and applicable Exchange Control Rulings.

**Criteria for evaluation of compliance**
The terms of the Imports and/or Exports Undertaking contracts entered into by the company as well as applicable Exchange Control Rulings of Exchange Control, comprise the criteria by which the company's compliance is to be evaluated for purposes of our limited assurance engagement.
The Imports and/or Exports Undertakings and applicable Exchange Control Rulings do not specify an internal control framework or specific controls over import and/or export transactions that provide objective criteria for assessing the design, implementation or operating effectiveness of internal controls over import and/or export transactions. However, as the auditors of the company, we have obtained an understanding of the entity and its environment, including its internal control, as part of our audit of the financial statements for the year ended [insert date], sufficient to identify and assess the risks of material misstatement of the financial statements whether as a result of fraud or of error. An [unqualified/modified] audit opinion was expressed on the financial statements for the year ended [insert date]. We have relied on information obtained during the course of our audit of the financial statements in evaluating the adequacy of the internal financial controls for the purpose of this engagement.

We will assess the activities affecting the company's import and/or export transactions. The nature and extent of our tests will vary according to our assessment of what is material in the context of our engagement. Where we wish to place reliance on the effectiveness of the internal control structure we may test the design, implementation and operating effectiveness of controls that specifically affect the company's import and/or export transactions as we deem appropriate.

Limitations
Owing to the inherent limitations of a system of internal control and because of the characteristics of irregularities, including concealment through collusion and forgery, errors or fraud may not be prevented or detected, and a properly designed and performed limited assurance engagement may not necessarily detect all irregularities.

Our procedures include the examination, on a test basis, of evidence that supports the import and/or export amounts and transactions and are designed and performed to provide limited assurance that the
company complies with the Imports and/or Exports Undertakings and applicable Exchange Control Rulings.

Consequently and because of the inherent limitations in internal control and the test nature of our limited assurance procedures, our engagement provides only limited assurance that all instances of non-compliance will be identified.

**Summary of work to be performed**

We have a working knowledge of the contents of the Imports and/or Exports Undertakings and applicable Exchange Control Rulings of Exchange Control, which will be applied during our engagement relating to import and/or export transactions of the company for the year ended [insert date]. Our procedures will include the examination, on a test basis, of evidence that supports the amounts and required documentation for the company's import and/or export transactions contained in the books, documents and other records of the company.

In addition we will perform such other substantive procedures as we consider necessary for obtaining evidence to support our limited assurance conclusion, regarding the company's compliance with the terms of the Imports and/or Exports Undertakings and the applicable Exchange Control Rulings of Exchange Control.

**Representations by management**

We may seek written representations from the directors of the company in relation to matters for which independent corroboration is not available. We will also seek confirmation from the directors that any significant matters of which we should be aware have been brought to our attention.

**Independent limited assurance report**

Our independent limited assurance report will be addressed to the directors of the company and to Exchange Control. Our report will relate only to compliance with the Imports and/or Exports Undertakings
and will not extend to the annual financial statements of the company, taken as a whole, or to any other business or operations of the company. On completion of our work, we will express a conclusion as to whether we have reason to believe that the company has complied with the Imports and/or Exports Undertaking and applicable Exchange Control Rulings. Instances of non-compliance that we have identified during our engagement will be included in our report.

We cannot guarantee that an unqualified, limited assurance conclusion will be expressed. Circumstances may arise in which it is necessary for us to modify our conclusion, or to withdraw from the engagement. In such circumstances, our findings and/or reasons for modification or withdrawal will be communicated to the board of directors.

**Reporting matters of governance to management**

During the performance of our procedures, other matters may come to our attention that relate to weaknesses in internal control or to areas where it may be possible to improve the efficiency or effectiveness of the company's operations in respect of its import and/or export transactions conducted in terms of the Imports and/or Exports Undertakings and the applicable Exchange Control Rulings of Exchange Control. We will report to the directors any significant deficiencies in the design, implementation or operation of internal controls that could adversely affect the organisation’s ability to comply with the Imports and/or Exports Undertaking contracts that come to our attention during our work.

We have, however, not been engaged to report on the company's internal control structure and our report may therefore not include all weaknesses. Should you at any time require a specific investigation for the purpose of providing limited assurance regarding the effective operation of any aspects of your internal control structure, or for any other purpose, we will be happy to consider a separate engagement, at your request.
Access to information and date of issuance
We understand that all records, documentation and information we request in connection with our engagement will be made available to us timeously, and that we will receive full co-operation from management and staff.

We intend to issue our report on the company's compliance with the Imports and/or Exports Undertakings on a mutually agreed date. Management's co-operation in providing us with records, documentation, information and agreed assistance on a timely basis is an important factor in our being able to issue our report by the agreed date.

Limitation of liability
[Audit firms should consider any limitations of liability applicable to this engagement. An appropriate paragraph should be included in accordance with the firm's risk-management policy.]

Restriction on distribution
Our report will be furnished solely for the information of the directors of the company and Exchange Control, in connection with the dispensation provided by Exchange Control in favour of the company, in terms of the provisions of the Imports and/or Exports Undertakings, and should be used only for this purpose. As our limited assurance report may not be suitable for any other purpose, it may not be distributed to any parties other than those specified above without our prior written consent.

Fees
[An indication of the fees to be charged and billing procedures should be included in the engagement letter.]

Agreement of terms
The engagement letter may be issued in conjunction with a firm’s standard terms and conditions or additional terms may be included in this section.

We are available to discuss this letter with you at any time. Once the terms of the engagement set out in this letter have been agreed, they will remain effective until the letter is replaced. Please confirm your agreement to the terms of this letter by signing and returning the enclosed copy, or let us know if the terms of the engagement are not in accordance with your understanding. Please initial every page of the engagement letter and the attached standard terms and conditions.

Yours faithfully

[Insert name of Assurance Provider/Audit Firm]
[Insert name of partner/director/sole practitioner]
[Insert title of partner/director/sole practitioner],
[Insert date]

The terms of engagement set out are agreed to by:

_____________________________________
[Insert name of company]

_____________________________________
Name
Authorised signature

_____________________________________

Designation ___________________________ Date
who warrants his/her authority to bind the entity.
APPENDIX II - ILLUSTRATIVE LIMITED ASSURANCE REPORT

Limited Assurance Report of the Independent Auditors to the Directors of [insert name of company granted dispensation] (the company) and the Exchange Control Department of the South African Reserve Bank (Exchange Control)

Introduction
We are the independent auditors of the company. Our work has been undertaken to conclude on the company's compliance with the terms of the Imports and/or Exports Undertakings entered into with Exchange Control, and the applicable Exchange Control Rulings, that we have been engaged to provide limited assurance on and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company, for our work, for this report, or for the conclusions we have formed.

Directors' responsibility
The directors of the company are responsible for the design, implementation and effective operation of adequate systems of control over import and/or export transactions and the maintenance of related supporting documentation that facilitate the prevention and detection of fraud and error, and establish policies and procedures to ensure compliance with the terms of the Imports and/or Exports Undertakings and applicable Exchange Rulings.

Auditors' responsibility
Our responsibility is to express our limited assurance conclusion to the directors and Exchange Control about whether the company has complied with the Imports and/or Exports Undertakings and applicable Exchange Control Rulings for the year ended [insert date] and to report on instances of non-compliance identified during our limited assurance engagement. We are not responsible for reporting on any import and/or export transactions beyond the period covered by our limited assurance engagement.
Our independent limited assurance engagement, relating to import and/or export transactions of the company in respect of the year ended [insert date] was performed in accordance with the International Standard on Assurance Engagements (ISAE 3000), *Assurance Engagements other than Audits or Reviews of Historical Financial Information*. This standard requires us to comply with ethical requirements and to plan and perform our limited assurance engagement so that we obtain sufficient appropriate evidence regarding the subject matter of the engagement to support our limited assurance conclusion, which is stated below. As a limited assurance conclusion is expressed, our evidence-gathering procedures are more limited than they would be for a reasonable assurance engagement, and therefore less assurance is obtained than would be in a reasonable assurance engagement.

Our engagement does not constitute an audit or review performed in accordance with International Standards on Auditing or International Standards on Review Engagements and consequently an audit or review opinion is not expressed.

**Subject matter**

The subject matter comprises the import and/or export transactions conducted in accordance with the Imports and/or Exports Undertakings dispensation granted by Exchange Control to the company during the year ended [insert date] and related supporting documentation required in terms of the Imports and/or Exports Undertakings and applicable Exchange Control Rulings.

**Criteria for evaluation of compliance**

The terms of the Imports and/or Exports Undertaking contracts entered into by the company as well as applicable Exchange Control Rulings of Exchange Control, comprise the criteria by which the company's compliance is to be evaluated for purposes of our limited assurance engagement.
The Imports and/or Exports Undertakings and applicable Exchange Control Rulings do not specify an internal control framework or specific controls over import and/or export transactions that provide objective criteria for assessing the design, implementation and operating effectiveness of internal controls over import and/or export transactions. As the auditors of the company, we have obtained an understanding of the entity and its environment, including its internal controls, as part of our audit of the financial statements for the year ended [insert date], sufficient to identify and assess the risks of material misstatement of the financial statements whether caused by fraud or error. An [unqualified/modified] audit opinion was expressed on the financial statements for the year ended [insert date]. We have relied on information obtained during the course of our audit of the financial statements in evaluating the adequacy of the internal financial controls over import and/or export transactions of the company for the purpose of this engagement.

Limitations
Owing to the inherent limitations of a system of internal control and because of the characteristics of irregularities, including concealment through collusion and forgery, errors or fraud may not be prevented or detected, and a properly designed and performed limited assurance engagement may not necessarily detect all irregularities.

Our procedures included the examination, on a test basis, of evidence supporting the amounts and transactions and were designed and performed to provide limited assurance that the company complies with the Imports and/or Exports Undertakings and applicable Exchange Control Rulings.

Summary of work performed
We planned and performed our work so that we were able to obtain all the information and explanations that we considered necessary to provide sufficient evidence for us to express our limited assurance
conclusion, which is stated below. In addition to the evidence obtained during the course of our audit of the financial statements for the year ended [insert date] our work consisted of:

General

- Studying and becoming familiar with the contents of the Imports and/or Exports Undertakings and Exchange Control Rulings and carrying out the procedures on the books, documents and other records of the company to determine whether or not the company complies with the Undertakings, as required by Exchange Control;

- Obtaining written representations from management regarding the adequacy of the internal financial controls to confirm that they would, if operating as designed, be adequate for ensuring compliance with the Imports and/or Exports Undertakings entered into with Exchange Control and their operation throughout the year ended [insert date];

Administration Requirements

- Obtaining a detailed understanding of the company's accounting system for recording foreign exchange transactions and commitments (we have documented the systems and corroborated their operation by means of inquiry and "walk through procedures");

Imports

- Selecting a representative sample of imports from the [bank account and from the inter-company account] [indicate relevant sources] with the company. For each transaction in the sample selected we performed the following substantive procedures:

  o We inspected the supporting import documentation, including inspecting the Integrated Form, invoice, bill of lading (or other transport document) and bill of entry for
compliance with the Imports Undertaking and Exchange Control Rulings;

- We inspected evidence that the goods were physically received in South Africa within four months of the payment date.

And/or:

Exports

- Selecting a representative sample of export sales from the detailed listing of all exports, which was extracted from the company's accounting records for the period [insert date - period start] to [insert date - period end] (tested for completeness during the financial statement audit). For the sample selected we performed the following substantive procedures:

- We inspected the supporting export invoice and prescribed declaration on the Integrated Form, the Form F178 and / or Form DA 550 or SAD 500, and confirmed the details of the sales order/contract for compliance with the Exports Undertaking and Exchange Control Rulings;

- We inspected the receipt of the foreign currency export proceeds, and traced these to the bank deposits and supporting order/contract, ensuring that the proceeds were received within six months of the date of shipment;

- We inspected the receipt of Rand exports proceeds and ensured that these payments emanated from Non-Resident Accounts only.

- We obtained bank statements of the customer foreign currency accounts (CFC) and matched transfers in and transfers out to determine whether the transfers occurred within 180 days;
We examined and tested the periodic export schedule reconciliation prepared by the entity at [insert date].

We believe that the evidence obtained as part of our audit of the annual financial statements for the year ended [insert date], together with additional evidence obtained as part of our limited assurance engagement, is sufficient and appropriate to provide a basis for our conclusion expressed below.

**Conclusion**

On the basis of our work performed, and subject to the limitations indicated above, no material incidents of non-compliance by the company with the requirements of the Imports and/or Exports Undertakings and Exchange Control Rulings that are required to be brought to the attention of Exchange Control were noted.

Without qualifying our conclusion above, we draw the attention of Exchange Control to the fact that it was not feasible for us to establish the reasonableness of the transaction/insurance value of the import and/or export samples selected with reference to current market prices as we are not conversant with current market prices.

**Restriction on distribution**

This report is furnished solely for the information of Exchange Control in connection with the exemption provided by Exchange Control in favour of the company, in terms of the provisions of the Imports and/or Exports Undertaking, and should be used only for this purpose.

[Insert name of Assurance Provider/Audit Firm]
[Insert name of partner/director/sole practitioner]
[Insert title of partner/director/sole practitioner],
Registered Accountant and Auditors (RAAs)
[Insert date]"
Section B.18(F)

The entire Section has been deleted and substituted with the following:

“(F) EXPORTS UNDERTAKING DISPENSATION

(i) Exchange Control would, on application, be prepared to consider requests absolving the Authorised Dealer(s) of certain companies from the responsibility of ensuring that such entities’ exports have resulted in the timeous accrual of foreign currency. In terms of the Exports Undertaking dispensation, this responsibility will rest with the company concerned.

(ii) Where Exchange Control has granted companies the Exports Undertaking dispensation, the external auditors of the companies are required to issue a report expressing a limited level of assurance to Exchange Control.

The format of the auditors’ limited assurance report is provided for in subsection B.1(F)(ii).”

Replacement pages of the Exchange Control Rulings incorporating the relevant amendments are attached hereto.

Deputy General Manager