



**LAW SOCIETY**  
OF SOUTH AFRICA

# Introduction to Social Media

Legal Implications for South African Law Firms



**Drafted for the  
Law Society of South Africa  
by Mark Heyink**

# **Introduction to Social Media - Legal Implications for South African Law Firms**

## **LSSA Guidelines**



**Attorney, Notary & Conveyancer  
Specialising in Information Law**

# Table of Contents

|   |    |
|---|----|
| Table of Contents .....                       | 1  |
| Foreword .....                                | 2  |
| Copyright .....                               | 2  |
| Chapter 1 .....                               | 6  |
| 1. INTRODUCTION .....                         | 6  |
| Chapter 2 .....                               | 7  |
| 2. INTERNATIONAL BAR ASSOCIATION SURVEY ..... | 7  |
| Chapter 3 .....                               | 8  |
| 3. PROFESSIONAL OBLIGATIONS .....             | 8  |
| Chapter 4 .....                               | 10 |
| 4. USE OF SOCIAL MEDIA BY EMPLOYEES .....     | 10 |
| Chapter 5 .....                               | 12 |
| 5. USE OF SOCIAL MEDIA BY ATTORNEYS.....      | 12 |

## Appendices

A - Example Social Media Policy

## Foreword

**Please read this foreword carefully.**

**This guideline has been compiled for the Law Society of South Africa primarily as a tool to assist attorneys in considering the use of social media.**

**By its nature the guideline is general, not exhaustive, and intended as a starting point to guide attorneys in the effective management of social media. This guideline is not intended and must not be construed as establishing any legal obligation. Neither is the guideline intended, nor must it be construed, as providing legal advice.**

**This guideline is supplementary to the Information Security and Management of eMail Guidelines published by the Law Society of South Africa, which should also be considered in using this Guideline.**

## Copyright

**Copyright in this material vests in Mark Heyink. The material may be used by the Law Society of South Africa under a licence granted by Mark Heyink.**

# Chapter 1

## 1. INTRODUCTION

- 1.1 The phenomenon of social networking and the development of social media (web-based and mobile technologies that turn text communications into active dialog) has been the most dramatic development in the information age over recent years. Social networking is not a fad and its application is an important development in the communications technologies which will shape changes in how we will communicate in the future. It is important that attorneys become familiar with the technologies and their application to enable them to determine both the advantages and risks inherent in their use.
- 1.2 The explosive growth of social networking is illustrated by Facebook (which was developed only 8 years ago) announcing on the 4<sup>th</sup> October 2012, that it now has over 1 billion users. Only China and India have larger populations. The uptake of social media is not confined to Facebook and there are many diverse platforms providing social media networks. The following statistics reveal the enormous prevalence of the use of social networking in our society:
- Twitter 595 million users
  - Linked-In 175 million users
  - Google 170 million users
  - Pinterest 117 million users
- 1.3 In a South African context the home grown MXit social media platform boasts on its website that it provides connectivity to more than 50 million users in Africa. The organization has seen significant investment by prominent and savvy South African business people who are seeking to grow MXit as a social media platform of choice in Africa. The ever accelerating ability of people to access the Internet and social networking services using mobile devices has only added to the enormous impetus of this phenomenon as is illustrated by the fact that more than 600 million people access Facebook using mobile devices.
- 1.4 The rampant growth of social media and the ability to connect with millions of users is firing electronic commerce and businesses are asking questions about how they may best exploit the opportunity to connect to the enormous number of people using social media. It is predicted that within a relatively short space of time communication using social media services will outstrip traditional email technologies. This will create a demand by clients that they are communicated with using their chosen mechanism for communication.
- 1.5 What does this important phenomenon in the information society mean to South African attorneys? This guideline identifies the following three broad issues which South African attorneys need to consider if they wish to stay abreast of these important developments:
- 1.5.1 What are the legal ramifications in the use of social media from a professional perspective?
  - 1.5.2 How the use of social media by attorney's employees may impact on the attorney's professional obligations and how may this be addressed?
  - 1.5.3 How can attorneys educate themselves in the potential use of social media and use social media to communicate with and provide services to their clients?

## Chapter 2

### 2. INTERNATIONAL BAR ASSOCIATION SURVEY

- 2.1 The importance of addressing online social networking and social media is highlighted by an International Bar Association survey published in February 2012<sup>1</sup>. What the survey reveals is that, as with all technologies, social media is neither wondrous or worthless but its value lies in how it is used. Further, that it does not transform appropriate and professional conduct into something unethical or unprofessional.
- 2.2 While the scope of this Guideline does not permit an in depth discussion of the survey and its findings (many of the issues are not pertinent in the South African context), the following major findings are of importance to the profession in South Africa<sup>2</sup>:
- ⦿ Only 15% of the respondents felt that the lawyer's use of online social networks negatively affects the public's confidence in the integrity and professionalism of the legal profession;
  - ⦿ Over 90% of the respondents found that online social networking presents a new set of challenges for the legal profession;
  - ⦿ Almost 70% of respondents felt that it is acceptable for lawyers and judges to have each other as contacts on online social networks;
  - ⦿ Over 90% of the respondents considered it unacceptable for lawyers and judges to post comments or opinions about fellow lawyers, judges, parties and cases in progress on online social networks;
  - ⦿ Over 75% of respondents considered the advantages of online social networking to outweigh its disadvantages;
  - ⦿ 95% of respondents thought that lawyers could benefit from training courses discussing the use of online social networking in the legal profession and practice;
  - ⦿ 80% of respondents stated that there is a need for ethical/professional codes and standards to be adapted to online social interactions affecting the legal profession and practice, as they cannot be adequately applied in their current form;
  - ⦿ Over 90% of respondents stated that there is a need for bar associations, law societies, and councils, or alternatively for the IBA to construe guidelines regarding the use of online social networking sites in the legal profession and practice.
- 2.3 The International Bar Association sees addressing social media as sufficiently important that it has proposed that an advisory group be established and has launched a project plan for social networking. Enquiries have been addressed to the International Bar Association requesting that its progress in this regard is reported to the author and in due course this Guideline will be supplemented by providing these reports to South African attorneys.

<sup>1</sup> The Impact of Online Social Networking on the Legal Profession and Practice, an initiative of the Legal Projects Team (February 2012)  
[www.ibanet.org/committees/divisions/legalpractice/impactofonlinesocialnetworkingonthellegalprofessionandpractice](http://www.ibanet.org/committees/divisions/legalpractice/impactofonlinesocialnetworkingonthellegalprofessionandpractice)

<sup>2</sup> Issues relating to jurors and law students have been excluded for the purposes of this guideline

## Chapter 3

### 3. PROFESSIONAL OBLIGATIONS

**The aim of this chapter is to assist the reader in understanding:**

- Potential risks of using social media; and
- How these risks may impact on the professional obligations of an attorney.

#### **Confidentiality**

- 3.1 Attorneys have a professional duty to maintain the confidentiality of information entrusted to them by their clients (and in many cases third party information). In certain instances this will also extend to the protection of attorney and client privilege.
- 3.2 I am sure that it will be conceded that it is not all that uncommon that employees and indeed attorneys themselves will sometimes discuss what they are doing in the workplace. In some cases this may occur with an intention to impress, and in others simply because it may provide an interesting topic of conversation. While these, seemingly innocent conversations, may constitute a breach of the obligation of confidentiality, the natural protection is that these disclosures would typically be fairly limited and quite probably not come to the attention of parties whose access to the information may adversely affect the rights of a client. Transport the same conversation into a social media environment and suddenly there is a potential for an infinitely wider audience. The possibility of a comment “going viral” is ever present and exponentially increases the possibility of the breach of confidence being damaging to the client.
- 3.3 Allied to this is the potential risk to the attorney, or the attorney’s firm, that the perception is created that the attorney is careless in protecting a client’s information and rights. If this becomes public knowledge, reputational damage to an attorney, or the firm, may be significant.

#### **Privacy Settings**

- 3.4 Despite a greater focus being placed on the importance of privacy in the social media context, some social media networks have little regard for privacy. The short history of social media has shown that the protections supposedly provided by privacy settings are often illusory and should not be trusted without further investigation. Even where privacy settings (and the obligation to protect information) are adhered to by the service provider, comments made by users of the network may be tagged and used elsewhere by other users. In the circumstances the responsibility must be taken by the attorney for ensuring that the levels of privacy which may be required are provided and can be maintained regardless of the representations made by the service provider.

#### **Integrity and Professional Independence**

- 3.5 Attorneys should take care to ensure that utmost integrity and professional independence should be maintained in all circumstances. Thought should be given to ensure that in social media interactions, whether made in a personal capacity or in a professional capacity, nothing done or said by the attorney can be construed in a manner that may compromise integrity or independence. This should be viewed particularly in the light of the much wider audience with which an attorney may interact on social

media. Comments which may, if made to friends known to the attorney, be construed merely as a joke or being facetious may be construed by those less well known to the attorney as having serious intent and taken literally.

### **Different Social Media Networks**

- 3.6 Different social media networks have different focuses and functions. As an example “Linked-In” is a business orientated social networking platform that may provide more appropriate facilities and a more professional focus than, for instance, Facebook. An attorney should carefully consider what options would best suit his or her needs. This is not to say that only one service should be chosen as there may be several which are appropriate for use by an attorney or to particular clients.

### **Public Trust**

- 3.7 The organised profession champions conduct that benefits the public perception of the profession and its ability to serve our community. It penalises misconduct and those found guilty of conduct unbecoming of the profession are appropriately dealt with. In circumstances where an attorney is guilty of serious misconduct he or she may be struck off the Roll.
- 3.8 Against this background attorneys would do well to recognize that there is no longer a distinction between the so-called “real world” and “cyberspace”. What happens online is accessible and is as much a part of the real world as anything we do in physical space. Thus, online conduct or comments that are unethical or unprofessional will be viewed in the same light as any other unprofessional or unethical conduct.



## Chapter 4

### 4. USE OF SOCIAL MEDIA BY EMPLOYEES

**The aim of this chapter is to draw the attention of attorneys to:**

- The use of social networks by their employees;
- The potential risks of employees' use of social networks; and
- The need to educate employees.

#### Employees' Use of Social Networks

- 4.1 The use of social networks is pervasive in our society. The initial intent of social networks, particularly Facebook, was to allow people to connect to as many other people as possible. In some circumstances subscribers will connect to many people (or "friends" to use Facebook terminology) and this may run literally into thousands of connected people having sight of all postings that may be made on the subscribers "wall" or social media page.
- 4.2 Often the connections are indiscriminately made and requests for connections indiscriminately accepted. It is quite conceivable therefore that an attorney's employees using social media may be connected to persons at other legal firms and/or businesses to whom information about the attorney's practice and clients may be important. In most instances it is likely that these connections will be innocent and simply have unintended consequences. However, there are many cases where information about businesses has been gained (with overt malicious intent) by targeting social media networks subscribed to by employees of a rival business. The potential risk to attorneys and attorney and client confidentiality is obvious.
- 4.3 On examining the use of social networking it has become apparent that in many instances users will post detailed comment on their lives and very often comment about what happens in their workplace. In many instances the distinction between communication of their own information and information which may be "owned" and regarded as confidential by employers appears to be misunderstood by the employee. It must be stressed that in the vast majority of cases no malice is intended and the employee is ill-informed about how the use of information which does not belong to him or her may have serious consequences.
- 4.4 The author has already had to deal with many cases where ill-advised comment posted on social media has led to the necessity for disciplinary action to be taken or the threat of legal proceedings to be made. In several instances failure to appreciate firstly, that the comment should not have been made in the first place, and secondly, that posting the comment on a social network greatly increases the possibility that it will come to the attention of parties to which it was not intended, has led to the dismissal of employees.
- 4.5 Against this background employers should appreciate that employees may be placing the business and its information at risk. The pervasiveness of social media demands that employers (even if they do not use social media networks or facilitate the use thereof) should be diligent in training users of their information in appreciating the value of their information and ensuring that control measures designed to prevent or limit risks to the information, inherent in use of social networks, is provided.

### Policy

- 4.6 While in most practices, whatever their size, the issue of confidentiality may be well understood and there may be non-disclosure or confidentiality clauses in employment contracts, firms would do well to emphasise the confidentiality obligations of employees. Smaller firms may wish to deal with this on a less formal basis than the development and implementation of formal policy documents, but it is suggested that it would be wise to develop and implement formal policy in this regard.
- 4.7 The development of policy will also focus attorney's minds on the issues that may be important to their particular practice. Further, existing policies in many cases will apply to information processed on information systems used by the attorney. It should be highlighted that it is not only the information systems that require protection, but information owned or controlled by the attorney.
- 4.8 A draft policy is provided with this Guideline (as an example), which will assist attorneys in considering the risks they may need to address in governing the use of information under their control. A policy developed by a practice may be used as an important tool in educating employees, whether they use social media facilitated by the attorney or in their personal capacity, where they may be tempted to disclose information under the attorney's control.

### Education

- 4.9 Employees should be educated in their duties to safeguard information in whatever media. It is suggested that this is reinforced in letters of employment and induction training of all new employees engaged by attorneys. It is also necessary that the terms governing the employment of existing employees and the education of existing employees is also reviewed and addressed.
- 4.10 The issues addressed in this Guideline are only one aspect of the overall obligation of any modern business to implement appropriate information security. Greater detail relating to information security is provided in the LSSA Guideline : Information Security for South African Law Firms.
- 4.11 To the extent that third parties may have access to information being processed by attorneys, it may also be necessary to have appropriate agreements governing the use of that information and incorporating a prohibition on comments which may be made in social media.

## Chapter 5

### 5. USE OF SOCIAL MEDIA BY ATTORNEYS

**The aim of this chapter is to:**

- Indicate advantages in the use of social media; and
- Provide background on the uptake of social media for business.

#### Resistance to Change

- 5.1 The attorneys profession is traditionally conservative and resistant to change. Even today there are firms where eMail is printed out by a secretary, read by the attorney, responses dictated and the eMail responses typed by the secretary. This attitude is clearly out of line with modern business and attorneys who fail to recognise the importance of changes in our environment and exploit the many advantages that modern technologies bring, will, sooner rather than later, be out of business.
- 5.2 Equally undesirable has been the rather cavalier attitude taken by some attorneys to the use of eMail, with little or no consideration for the risks to confidentiality and integrity of the information and what information security measures should be adopted in processing information consistent with the attorneys professional obligations. Recognition of the professional obligation to keep abreast of the changes that information technology has brought to our society has again been given by our judiciary in the case of CMC Woodworking Machinery (Pty) Ltd vs. Piet Odendaal Kitchens (KZMD) (unreported case number 6846/2006, 3-8-2012). In that case Judge Steyn granted an application for substituted service of a notice of set down and pre-trial directions of the respondent via message on the social media website Facebook. In doing so Judge Steyn stated “Changes in the technology of communication have increased exponentially and it is therefore not unreasonable to expect the law to recognise such changes and accommodate them”. The Judge also cautioned that “courts, however, have been somewhat hesitant to acknowledge and adapt to all the aforesaid changes and this should be understood in the context that courts adhere to established procedures in order to promote legal certainty and justice”.<sup>3</sup>
- 5.3 What should be recognised is that attorneys are knowledge workers and that the processing of information is the very lifeblood of every practice. In the 21<sup>st</sup> Century the development of information and communications technologies infinitely enhance the ability to process information and these changes should be embraced, with considered care by all attorneys who wish to remain relevant in the 21<sup>st</sup> Century.

#### Advantages

- 5.4 The immediate advantage of social media from a business perspective is the sheer number of persons to whom a business may connect. This may open commercial or marketing application which may be attractive to many attorneys. Social media may also provide a platform for the provision by an attorney of services which the attorney wishes to make available to its clients, particularly when the services are on a “one to many” basis.

<sup>3</sup> For further information see the article by Kim Hawkee published in De Rebus October 2012

- 5.5 A further advantage is the ease of communication using social networks and the ability to connect to people who have similar interests or challenges that need to be addressed. This may well enhance the ability of an attorney to research and find solutions to problems which require resolution.
- 5.6 An advantage may simply be the ability to communicate with clients who no longer use traditional eMail but prefer the communication technologies provided by social media networks. It is predicted that communication through social media will in a relatively short space of time be used as much as traditional eMail.
- 5.7 There are in all likelihood many other advantages that may be exploited by attorneys that have not been considered by the author (or possibly anyone) but which in the fullness of time will reveal themselves.

### **Adoption of Social Media**

- 5.8 Attorneys who foresee opportunities and benefits in the use of social media must nonetheless take heed of the risks, some of which are highlighted in this Guideline, in doing so. It is not a course that should be taken lightly and the safeguards necessary in embarking on this journey need to be carefully considered.
- 5.9 One of the things that must be guarded against is simply using social media as a goal in itself or “because others are doing so” without considering and strategizing how this will best serve the practice of the attorney. At the same time it should be borne in mind that in the same way that eMail was not readily adopted by many attorneys and in some cases was only used once the demand from clients dictated the use of eMail, the same thing will happen with social media. To ignore this trend may be a considerable business risk.
- 5.10 The use of social media as a promotional or marketing mechanism also needs to be carefully considered. Many businesses, including attorneys, have simply established websites because everybody does so. Often these websites are poorly established, infrequently, if ever, updated, and in many cases reflect poorly on the professionalism of the firm rather than enhance its image. Social media is even more dynamic than a website and if it is to add value, a commitment will have to be made to ensuring that content is regularly “fed” into social media networks.
- 5.11 In all cases it is advisable that attorneys weigh both the advantages and the challenges that social media will bring to their practices. In most instances attorneys will require expert assistance in making these decisions. It should be recognised that the use of social media is multi-faceted and needs a multi-disciplinary approach and expertise in at least, marketing, information technology and the law.

|                      |  |
|----------------------|--|
| <b>LAW ATTORNEYS</b> | <b>SOCIAL MEDIA</b>  |
|                      | <b>POLICY</b>  |
|                      | This is provided by way of example only and should be carefully considered and amended as may be appropriate before being implemented. |

## 1. INTRODUCTION

Law Attorneys (Pty) Ltd ("Law") recognises the evolution of social media as a mechanism of communication in the conduct of its business. To optimise the use of social media it must be used responsibly and adhere to the professional obligations mandated by relevant regulatory bodies and the ethics that Law encourages and expects from its employees, users of its information and its information systems.

While use is made of the term "employee" in this Policy, it includes directors, partners or third parties engaged by Law who have access to its information and its information systems.

## 2. PURPOSE

This Policy is supplementary to Law's Information Security Policy. Its purpose is to govern the use by Law employees and users of its information system in the communication of any Law-related information and the appropriate use of social media platforms, whether enabled by Law or by third parties.

## 3. SCOPE

This policy applies to all users of Law information and information systems, or under the control of Law (including but not limited to information entrusted to Law by its clients and any other third parties). It also applies to the expression of opinions and comments by Law employees on social media, which may in any manner link employees to Law or its clients.

## 4. GLOSSARY OF TERMS

Unless inconsistent with the context, the expressions set out in this policy will have the meanings assigned to them in the glossary of terms applicable to all policies, procedures, standards and guidelines adopted and published by the Law Information Security Committee ("ISC"). The Glossary of terms shall be available on the Law website (*URL to be inserted*).

*[Glossaries are individual to different entities and should be developed to ensure that they reflect the terms that are used and commonly understood within the entity. It may be necessary that certain of the terms used in this example policy need to be amended.]*

## 5. POLICY STATEMENTS

### General

- 5.1 Law embraces change and recognises the fundamental changes and opportunities that social media platforms provide to the way that persons, both actual and juristic, communicate.
- 5.2 Law's policy is to encourage its employees to use new business tools in a responsible manner to enhance Law's communication, and ultimately its business.

|                      |  |
|----------------------|--|
| <b>LAW ATTORNEYS</b> | <b>SOCIAL MEDIA</b>  |
|                      | <b>POLICY</b>  |
|                      | This is provided by way of example only and should be carefully considered and amended as may be appropriate before being implemented. |

- 5.3 Law's policy is to empower its employees to understand both the advantages and the potential risks of social media, so that they may enhance their use of social media and avoid or mitigate the risks inherent in social media.
- 5.4 Law recognises that the evolution of social media is explosive and that this policy requires regular review to ensure that it remains relevant.

### **Law Employees**

- 5.5 Law employees using any social media platform for purposes related to their employment at Law, or which may in any manner link such use with Law, shall:
- 5.5.1 if they have the authority to make statements on behalf of Law, clearly indicate such authority;
- 5.5.2 if they do not have authority to make statements on behalf of Law clearly indicate that the statement is their own opinion and does not represent Law or any other person at Law;
- 5.5.3 adhere to relevant policies, procedures and standards published by Law governing the publication of Law information, its information security and communications by Law employees;
- 5.5.4 read and adhere to the terms and conditions governing communications on the social media platforms that they may use;
- 5.5.5 strictly observe all confidentiality obligations applicable to information processed by the employee and not communicate any confidential information using social media or any other communication platforms;
- 5.5.6 strictly observe the obligation of client confidentiality, and where applicable, attorney and client privilege owed by Law to its clients;
- 5.5.7 not post:
- 5.5.7.1 information which may be detrimental to Law's clients;
- 5.5.7.2 information of any nature relating to matters handled by Law;
- 5.5.7.3 information or comments pertaining to other legal professionals including, but not limited to, colleagues employed by Law, judges, magistrates and counsel;
- 5.5.7.4 content that may be used for any unlawful purposes or in the furtherance of illegal activities;
- 5.5.7.5 any person's private information (including photographs or images of the person) of whatever nature, without the prior written authority of the person;
- 5.5.7.6 any threats of violence of whatever nature;
- 5.5.7.7 any obscene or pornographic images;

|                      |  |
|----------------------|--|
| <b>LAW ATTORNEYS</b> | <b>SOCIAL MEDIA</b>  |
|                      | <b>POLICY</b>  |
|                      | This is provided by way of example only and should be carefully considered and amended as may be appropriate before being implemented. |

- 5.5.7.8 any communication or image which may be defamatory or violate the personality rights of any party;
- 5.5.7.9 any communication which is offensive, threatening, abusive, harassing, harmful or hateful;
- 5.5.7.10 a communication which violates the intellectual property rights of third parties; and
- 5.5.7.11 information detrimental to Law or any of its employees.
- 5.5.8 regularly review the content of your personal social media postings and remove any information that you feel could reflect negatively on the employee, Law or its clients;
- 5.5.9 always log out of social media applications when you have completed the use of the application;
- 5.5.10 not use social media platforms to communicate unsolicited communications of whatever manner; and
- 5.5.11 not impersonate third parties in a manner that does or is intended to mislead, confuse or deceive others.

### **Third Parties Using Law Information Systems**

*[This is only necessary if an attorney has adopted the use of social media networks and makes provision for the access to these networks through the attorney's information systems.]*

- 5.6 All persons using social media platforms through links that are made available on Law's information systems and in particular its website shall adhere to this Policy, Law's Information Security Policy and the terms and conditions that govern the use of the applicable social media platforms.

## **6. ENFORCEMENT OF THIS POLICY**

- 6.1 This policy shall have the force of an agreement between Law and persons employed by Law, persons having access to and using Law information in postings on social media platforms and persons using social media platforms accessed through Law information systems.
- 6.2 This policy shall be enforced by persons appointed by the Law ISC.
- 6.3 If disciplinary proceedings are appropriate, they will be conducted in terms of the disciplinary procedures in force at Law from time to time.

## **7. REVIEW**

- 7.1 The ISC shall:

|                      |  |
|----------------------|--|
| <b>LAW ATTORNEYS</b> | <b>SOCIAL MEDIA</b>  |
|                      | <b>POLICY</b>  |
|                      | This is provided by way of example only and should be carefully considered and amended as may be appropriate before being implemented. |

- 7.1.1 review Law's use of social media networks regularly and to the extent necessary, develop new technological interfaces and controls, new policy and amend existing policy to enhance Law's use of social media as a communications tool.
- 7.1.2 ensure that all new policy documents or amendments to existing policy are approved in accordance with the provisions of this policy, and where appropriate, made available to employees or users of Law's information or its information systems;
- 7.1.3 maintain a revision history of this Policy in the schedule appended to this Policy entitled "Revision History | Social Media Policy"



|                      |  |  |
|----------------------|--|--|
| <b>LAW ATTORNEYS</b> | <b>REVISION HISTORY : SOCIAL MEDIA</b>   |  |
|                      | <b>POLICY</b>  |  |
|                      | This is provided by way of example only and should be carefully considered and amended as may be appropriate before being implemented. |  |

**APPENDIX A**

| <b>APPROVAL</b>   |                              |                 |
|-------------------|------------------------------|-----------------|
| Name of Document: | Social Media Policy          |                 |
| Version:          |                              | Effective Date: |
| Approved by ISC:  | Signature of Chairman of ISC | Date Approved   |

| <b>REVISION HISTORY</b>        |                              |                 |
|--------------------------------|------------------------------|-----------------|
| Date of Revision:              |                              |                 |
| Reason for Revision:           |                              |                 |
| Brief Description of Revision: |                              |                 |
| Version/Revision No:           |                              | Effective Date: |
| Approved by ISC:               | Signature of Chairman of ISC | Date Approved   |

| <b>REVISION HISTORY</b>        |                              |                 |
|--------------------------------|------------------------------|-----------------|
| Date of Revision:              |                              |                 |
| Reason for Revision:           |                              |                 |
| Brief Description of Revision: |                              |                 |
| Version/Revision No:           |                              | Effective Date: |
| Approved by ISC:               | Signature of Chairman of ISC | Date Approved   |

| <b>REVISION HISTORY</b>        |                              |                 |
|--------------------------------|------------------------------|-----------------|
| Date of Revision:              |                              |                 |
| Reason for Revision:           |                              |                 |
| Brief Description of Revision: |                              |                 |
| Version/Revision No:           |                              | Effective Date: |
| Approved by ISC:               | Signature of Chairman of ISC | Date Approved   |