

THE PROMOTION OF ACCESS TO INFORMATION MANUAL (“Manual”)

**In terms of section 51 of the Promotion of Access to Information Act 2 of 2000
(the “PAIA”)**

1. PREAMBLE

1.1. The Promotion of Access to Information Act, 2000 (“PAIA”) came into operation on 9 March 2001.

PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights.

Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.

1.2. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private

body and stipulates the minimum requirements that the manual has to comply with.

1.3 This Manual constitutes The Company PAIA manual.

This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 (“POPIA”), which gives effect to everyone’s Constitutional right to privacy.

POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information.

POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

1.4. This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

2. ABOUT THE COMPANY

2.1. The Manual is applicable to The Company and is available to view at its premises at Unit 5, Bush Hill Office Park, Cnr. Christiaan de Wet and Dolfyn Roads, Honeydew, 2170.

2.2. This PAIA Manual is compiled not only to ensure that The Company complies with PAIA and POPIA, but is also intended to:

2.2.1. foster a culture of transparency and accountability within The Company by giving effect to the right to information that is required for the exercise or protection of any right; and

2.2.2. actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.

3. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

3.1. to provide a list of all records held by The Company;

3.2. to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;

3.3. to define the manner and form in which a request for information must be submitted; and

3.4. to comply with the additional requirements imposed by POPIA.

4. CONTACT DETAILS

Company Name C.T.L. Group Holdings (Pty) Ltd

Information Officer Name Darran Ledden

Information Officer Email darran@ctlgroup.co.za.co.za

Postal address P O Box 2040, Honeydew, 2070

Telephone number (+27) 11 794 7928

5. THE INFORMATION OFFICERS

5.1. PAIA and POPIA requires the appointment of an Information Officer which in relation to a private body means the head of a private body as contemplated in section 1 of PAIA.

5.2. Section 56 of POPIA makes provision for the appointed Information Officer to delegate the associated duties and responsibilities to a duly authorised person.

All requests to The Company for information in terms of the Act must be addressed to the Information Officer.

6. INFORMATION REGULATORS GUIDE

- 6.1. An official Guide will be, or has been, compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA.

This Guide is made available by the Information Regulator (established in terms of POPIA).

Copies of the updated Guide are available from Information Regulator and the Information Officer free of charge.

Any request for public inspection of the Guide at the office of the Information Officer or a request for a copy of the Guide from the Information Officer must substantially correspond with Form 1 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Annexure annexed hereto.

- 6.2. Any enquiries regarding the Guide should be directed to:

Postal Address JD House
 27 Stiemens Street
 Braamfontien
 Johannesburg, 2001

Email POPIAComplaints@inforegulator.org.za

Website www.inforegulator.org.za

7. ENTRY POINT FOR REQUESTS

- 7.1. PAIA provides that a person may only make a request for information if the information is required for the exercise or protection of a legitimate right.
- 7.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable The Company to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right.

The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance.

PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.

- 7.3. The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 7.4. The Information Officer will facilitate the liaison with the internal legal team on all of these requests.
- 7.5. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details as set out above

8. AUTOMATICALLY AVAILABLE INFORMATION

8.1. Information that is obtainable via The Company's website about The Company is automatically available and need not be formally requested in terms of this Manual.

8.2. The following categories of records are automatically available for inspection, purchase or photocopying:

8.2.1. brochures and information pamphlets

8.2.2. any public documents

8.2.3. publications; and

8.2.4. various other marketing and promotional material.

9. INFORMATION AVAILABLE IN TERMS OF POPIA

9.1. Categories of personal information collected by The Company

The Company may collect information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

9.1.1. information relating to the gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

- 9.1.2. information relating to the education or the medical, financial, criminal or employment history of the person;
- 9.1.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 9.1.4 the personal opinions, views or preferences of the person;
- 9.1.5 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- 9.1.6 the views or opinions of another individual about the person;
and
- 9.1.7. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;
- 9.1.8 the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or
- 9.1.9 the criminal behaviour of a data subject to the extent that such information relates to-
 - 9.1.9.1. the alleged commission by a data subject of any offence; or

9.1.9.2. any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

9.2. The purpose of processing personal information

9.2.1. In terms of POPIA, personal information must be processed for a specified purpose.

The purpose for which data is processed by The Company will depend on the nature of the data and the particular data subject.

This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

Please also refer to the Company's Privacy Policy for further information.

9.2.2. In general, personal information is processed for purposes of dealing with customers, complaints, procurement purposes, records management, security, employment and related matters.

9.3. A description of the categories of data subjects and of the information or categories of information relating thereto

The Company holds information and records on the following categories of data subjects:

- clients of The Company;

- Employees / personnel of The Company;
- Any third party with whom The Company conducts business;
- Tenants and independent contractors of The Company;
- Suppliers and service providers of The Company.

9.4. The recipients or categories of recipients to whom the personal information may be supplied

Depending on the nature of the personal information, The Company may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- South African Revenue Services, or another similar authority;
- Anyone making a successful application for access in terms of PAIA or POPIA; and
- Subject to the provisions of POPIA and other relevant legislation, The Company may share information about a client's

creditworthiness with any credit bureau or credit provider's industry association or other association for an industry in which The Company operates.

9.5. Planned trans-border flows of personal information

- If a data subject visits The Company's website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.

9.6. A general description of information security measures to be implemented by The Company

The Company takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in our possession. The Company takes appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

10. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation:

- Administration of Estates Act 66 of 1965
- Arbitration Act 42 of 1965

- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Close Corporations Act 69 of 1984
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Constitution of South Africa Act 108 of 1996
- Criminal Procedure Act 51 of 1977
- Customs and Excise Act 91 of 1964
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Environment Conservation Act 73 of 1989
- Estate Agency Affairs Act 112 of 1976
- Explosives Act 13 of 1956
- Financial Markets Act 19 of 2012
- Hazardous Substances Act 15 of 1973
- Income Tax Act 58 of 1962
- Insolvency Act No. 24 of 1936
- Labour Relations Act 66 of 1995
- Mine Health and Safety Act 29 of 1996
- Minerals Act 50 of 1991
- Mineral and Petroleum Resources Development Act 28 of 2002
- Mineral and Petroleum Resources Royalty (Administration) Act 28 of 2008
- National Credit Act 34 of 2005
- National Dust Control Regulations, 2013 under the National Environmental Management: Air Quality Act 39 of 2004
- National Environmental Management Act 107 of 1998
- National Environmental Management: Waste Act 59 of 2008
- National Water Act 36 of 1999
- Occupational Diseases in Mines and Works Act 78 of 1973

- Occupational Health & Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- Prevention and Combatting of Corrupt Activities Act 12 of 2004
- Prevention of Organised Crime Act 14 of 1998
- Protected Disclosure Act 26 of 2000
- Promotion of Access of Information Act 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protection of Personal Information Act 4 of 2013
- Sarbanes Oxley Act of 2000
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Stock Exchanges Control Act No 1 of 1985
- Stock Exchanges Control Amendment Act 54 of 1995 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)
- Tax Administration Act 28 of 2011
- Trade Marks Act 194 of 1993
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

11. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

11.1. The Company maintains records on the categories and subject matters listed below.

Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured.

All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

11.2. Please note further that many of the records held by The Company are those of third parties, such as clients and employees, and The Company takes the protection of third-party confidential information very seriously.

In particular, where The Company acts as advisors to clients, many of the records held are confidential and others are the property of the client and not of The Company.

For further information on the grounds of refusal of access to a record please see paragraph 12.5 below.

Requests for access to these records will be considered very carefully.

Please ensure that requests for such records are carefully motivated.

Category of records	Records
<p>Internal records</p> <p>The records listed pertain to The Company’s own affairs</p> <p>Some of these categories of records are covered in more detail below</p>	<ul style="list-style-type: none"> • Memoranda and Articles of Association • Financial records • Operational records • Intellectual property • Marketing records • Internal correspondence • Service records • Statutory records • Internal policies and procedures • Minutes of meetings
<p>Personnel records</p> <p>For the purposes of this section, “personnel” means any person who works for or provides services to or on behalf of The Company and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of The Company.</p> <p>This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers.</p>	<ul style="list-style-type: none"> • Any personal records provided to us by our personnel • Any records a third party has provided to us about any of their personnel • Conditions of employment and other personnel-related contractual and quasi legal records • Employment policies and procedures • Internal evaluation and disciplinary records and • Other internal records and correspondence.

<p>Client-related records</p>	<ul style="list-style-type: none"> • Contracts with the client and between the client and other persons
<p>Other third party records</p> <p>Records are kept in respect of other parties, including without limitation joint ventures and consortia to which The Company is a party, contractors and sub- contractors, suppliers, service providers, and providers of information regarding general market conditions.</p> <p>In addition, such other parties may possess records which can be said to belong to The Company.</p>	<ul style="list-style-type: none"> • Personnel, client, or The Company records • which are held by another party as opposed to being held by The Company • Records held by The Company pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers
<p>Strategic Planning Records</p>	<ul style="list-style-type: none"> • Operational plans • Strategic plans • In the event that The Company is listed in future on the JSE (or other exchange), JSE Socially Responsible Investment Index questionnaire (or its equivalent on any other exchange).

Human Resources Records

- Booklets and Codes for employees
- Collective agreements
- Human Resources Policies
- Employee records relating to:
 - Employment
 - Remuneration and Incentives
 - Accommodation
 - Performance Management
 - Employee Development
 - Employee Relations
 - Employee Care
 - Human Resource Administration
 - Health and Wellness
 - Separations
 - Managerial
 - Disciplinary Hearings

Finance Records

- Records for The Company comprise:
 - Vendor invoices
 - Remittance advices
 - Accounts receivable
 - Banking records
 - Management and monthly accounts, quarterly and annual financial statements
 - External audit reports and records
 - Annual budgets
 - Fixed asset register
 - Accounting policies and procedures
 - Benchmarking
 - Guarantees, undertakings, subordinations, bonds and similar liabilities

- Other records comprise:
 - Medical scheme reports
 - Financial correspondence

- Operational Audit, Risk (including Insurance)

Property Records

- Agreements to which The Company is party to, including asset acquisitions, disposals, exchanges, joint ventures, participations arrangements and confidentiality agreements
- Records relating to:
 - Bonds
 - Closure certificates
 - Social and Labour Plan
 - Property leases (freehold farms and erven)
- General Permits:
 - Water usage
 - Change of use of land
 - Land subdivision
 - Servitudes
 - Freehold properties
 - Freehold erven

Legal Records

- Details of external counsel used by the company (locally and abroad)
- Copies of agreements to which group companies are party to
- List of current matters
- Details of legal proceedings
- General legal correspondence

Tax Records

- Tax returns as filed with the South African Revenue Services (“SARS”)
- Correspondence with SARS on various issues – including objections to assessments, rulings obtained etc
- Documentation on tax advice and opinions obtained from external counsel
- Documentation on “internal” matters of The Company e.g. employees’ tax matters etc.

Secretariat Records

- Records relating to The Company comprising:
 - Memoranda of Incorporation
 - Equity structure details
 - Statutory compliance records
 - Manual of records
- Shareholders records comprising:
 - Correspondence and queries
 - Notices, circulars and minutes of general meetings
 - Share certificates and transfer forms
 - Offshore stock exchanges
 - Dividend declarations and announcements
 - American depository receipts programme
 - Share schemes
 - Correspondence with investors
 - Securities regulation panel dealings
 - Shareholders agreements/ Approval framework
- Records concerning Directors and Officers comprising:
 - Appointments, resignations and fees
 - Board and committee meetings attendance
 - Group committees and terms of reference
- Approval framework

**Information and Communication Technology
Records**

- Supply and maintenance contracts
- Policies, standards and procedures
- Internal reports and correspondence
- ICT strategy plan
- Audit reports pertaining to ICT
- Project plans and project minutes
 - Software licensing agreements

Operations Records

- Current records concerning:
 - Business plans
 - Capital projects
 - Administration and management of the operations
 - Health, safety and environmental
 - Operational reports

Other records

- Information relating to The Company
 - Research information belonging to The Company or carried out on behalf of a third party

12. REQUEST PROCEDURE

12.1. Completion of the prescribed form

12.1.1. Any request for access to a record in terms of PAIA must substantially correspond with Form 2 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations and should be specific in terms of the record requested.

12.1.5. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you, but you can contact our Information Officer should you require assistance.

12.1.6. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.

12.1.7. POPIA provides that a data subject may object, at any time, to the processing of personal information by The Company, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Annexure and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

12.1.8. A data subject may also request The Company to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained

unlawfully; or destroy or delete a record of personal information about the data subject that The Company is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

12.1.9. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the form attached hereto as Annexure.

12.2. Proof of identity

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

12.3. Payment of the prescribed fees

12.3.1. There are two categories of fees which are payable:

12.3.1.1. The request fee: R140.00

12.3.1.2. The access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in Annexure A.

- 12.3.2. Section 54 of PAIA entitles The Company to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records.

The fees that may be charged are set out in Annexure B of Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Annexure A annexed hereto under then fees section.

- 12.3.3. Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

12.4. Timelines for consideration of a request for access

- 12.4.1. Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

- 12.4.2. The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Annexure D.

- 12.4.3. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

12.5. Grounds for refusal of access and protection of information

12.5.1. There are various grounds upon which a request for access to a record may be refused.

These grounds include:

- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
- the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- if the record was produced during legal proceedings, unless that legal privilege has been waived;
- if the record contains trade secrets, financial or sensitive information or any information that would put The Company (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by The Company.

12.5.2. Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

12.5.3. If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record.

13. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

13.1. If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

13.2. There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final.

In the event that you are not satisfied with the outcome of the request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

13.3. Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record,

the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

14. AVAILABILITY OF THIS MANUAL

Copies of this Manual are available for inspection, free of charge, at the offices of The Company.

The Manual is also available on the website of The Company at <https://www.ctlgroup.co.za>

FEES IN RESPECT OF PRIVATE BODIES

ANNEXURE A

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
 - (a) For every photocopy of an A4-size page or part thereof R1,10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R0,75
 - (c) For a copy in a computer-readable form on - R7,50
 - (i) stiffy disc
 - (ii) compact disc R70,00
 - (d)
 - (i) For a transcription of visual images, for an A4-size page or part thereof R40,00
 - (ii) For a copy of visual images R60,00
 - (e)
 - (i) For a transcription of an audio record, for an A4-size page or part thereof R20,00
 - (ii) For a copy of an audio record R30,00
2. The fees for reproduction referred to in regulation 11(1) are as follows:
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:
 - (1)(a) For every photocopy of an A4-size page or part thereof R1,10

- | | | |
|-----|---|--------|
| (b) | For every printed copy of an A4-size page or part thereof held on a computer or in electronic machine readable form | R0,75 |
| (c) | For a copy in a computer-readable form on - | |
| | (i) stiffy disc | R7,50 |
| | (ii) compact disc | R70,00 |
| (d) | (i) For a transcription of visual images, for an A4-size page or part thereof | R40,00 |
| | (ii) For a copy of visual images | R60,00 |
| (e) | (i) For a transcription of an audio record, for an A4-size page or part thereof | R20,00 |
| | (t) For a copy of an audio record | R30,00 |
| (f) | To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation. | |

(2) For purposes of section 54(2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable;
and
- (b) one third of the access fee is payable as a deposit by the requester.

(3) The actual postage is payable when a copy of a record must be posted to a requester.