

**Promotion of Access to Information Act Manual
For Strate Proprietary Limited**

**3rd Floor, 2 Gwen Lane
Sandown
Sandton**

13 March 2019

Version 4

strate

Contents of this material are protected under South African copyright law. No part of this material may be copied, completely or partially, either electronically or manually, without the written consent of Strate (Pty) Ltd. This material remains the sole property of Strate (Pty) Ltd.

INDEX

1.	Interpretation	1
2.	Aim	3
3.	Strate contact details	3
4.	Head and Request liaison officer	4
5.	Human Rights Commission Guide	4
6.	Records automatically available to either employees or the general public	4
7.	Records held by the company in terms of other legislation	5
8.	Other types of record held by the company as contemplated in section 51 (1) (c)	
8.1	Human Resources Department	6
8.2	Information Technology Department	7
8.3	Finance Department	7
8.4	Marketing Department	8
8.5	Regulation Department	8
8.6	Business Operations Department	9
8.7	Surveillance Department	9
8.8	Corporate Actions Department	10
8.9	Issuer & Asset Services Department	10
9.	Process for requesting information not automatically available	10
10.	Information or records not found	13
11.	Information requested about a third party	14
12.	Updating of the manual	14

MANUAL AS REQUIRED BY SECTION 51 OF ACT NO 2 OF 2000, PROMOTION OF ACCESS TO
INFORMATION (“THE ACT”)

INTERPRETATION

In this document, clause headings are for convenience and shall not be used in its interpretation, unless the context clearly indicates a contrary intention –

- 1.1 an expression which denotes –
 - 1.1.1 any gender includes the other genders;
 - 1.1.2 a natural person includes an artificial or juristic person and vice versa;
 - 1.1.3 the singular includes the plural and vice versa;

- 1.2 the following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings –
 - 1.2.1 “this document” – this document together with all of its annexures, as amended from time to time;
 - 1.2.2 “business day” – any day other than a Saturday, Sunday or official public holiday in the Republic of South Africa;
 - 1.2.3 “the company” – Strate Proprietary Limited, Registration number 1998/022242/07 with its registered office being, 3rd Floor, 2 Gwen Lane, Sandown, Sandton, 2196;
 - 1.2.4 “the Act” – Promotion of Access to Information Act No.2 of 2000, as amended from time to time including the regulations promulgated in terms of the Act;
 - 1.2.5 “request liaison officer” – the person duly authorised by the head of the private body and appointed by the company to facilitate or assist the head of the private body with any request in terms of the Act;

- 1.3 any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time;
- 1.4 if any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision in the body of this document;
- 1.5 where any number of days is to be calculated from a day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day;
- 1.6 any reference to days (other than a reference to business days), months or years shall be reference to calendar days, months or years, as the case may be;
- 1.7 the use of the word “including” followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it;
- 1.8 in so far as there is a conflict in the interpretation of, or application of this document and the Act, the Act shall prevail;
- 1.9 this document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise his/her/itself with the provisions of the Act before lodging any request with the company.

2. AIM

To facilitate the requests for access to records of the company provided for in the Act.

3. DETAILS

Strate Proprietary Limited
P O Box 78608
Sandton 2146

3rd Floor
2 Gwen Lane
Sandown
Sandton 2196

Tel: 011 759 5300
Fax:011 759 5500

4. CONTACT DETAILS OF THE HEAD OF THE PRIVATE BODY AND REQUEST LIASON OFFICER

4.1 The head of the private body is:
André Nortjé
Tel: 011 759 5300
e-mail: andren@strate.co.za

4.2 The request liaison officer is:

Anne Njoroge
Tel: 011 759 5318
Fax: 011 759 5500
e-mail: annen@strate.co.za

5. HUMAN RIGHTS COMMISSION (“HRC”) GUIDE

5.1 The HRC has compiled a guide as contemplated in section 10 of the Act, containing information to assist any person who wishes to exercise any right as contemplated in the Act;

5.2 Please direct any enquiries to:

The Human Rights Commission:

Postal address: Private Bag 2700
Houghton
Johannesburg
2041

Telephone: +27 11 877 3600

Website: www.sahrc.org.za

6. RECORDS THAT ARE AUTOMATICALLY AVAILABLE TO EITHER EMPLOYEES OR THE GENERAL PUBLIC

6.1 The following records are automatically available to all employees and need not be requested in accordance with the procedure outlined in paragraph 10 –

- 6.1.1 personnel records are available to the employee whose file it is;
- 6.1.2 records of disciplinary hearings and related matters are available to the employee concerned;
- 6.1.3 the company's policies and procedures manual;
- 6.1.4 the company's document format manual;

6.2 The following records are automatically available to the general public and all employees and need not be requested in accordance with the procedure outlined in paragraph 10 –

- 6.2.1 the company's employment equity plan;
- 6.2.2 the company's skills development plan.

6.3 The cost to access, reproduce, search for and or prepare any of the abovementioned records, unless otherwise agreed, is –

- 6.3.1 for every A4 size photocopy – R1,10;
- 6.3.2 for every printed A4 size page – R0,75;
- 6.3.3 for a copy on a stiffer disc – R7,50;
- 6.3.4 for a copy on a compact disc – R70,00;
- 6.3.5 for a transcript of an audio record, for an A4 size page or part thereof R20,00; and
- 6.3.6 for a copy of an audio record – R30,00.

7. RECORDS HELD BY THE COMPANY IN TERMS OF OTHER LEGISLATION AS CONTEMPLATED IN SECTION 51(1)(d) OF THE ACT

The following records are not automatically available without a request in terms of the Act:

- 7.1 all statutory returns –
 - 7.1.1 VAT
 - 7.1.2 workmen’s compensation;
 - 7.1.3 UIF;
 - 7.1.4 regional services levies;
 - 7.1.5 skills development levies.

8. OTHER TYPES OF RECORDS HELD BY THE COMPANY AS CONTEMPLATED IN SECTION 51(1)(e)

These records are not automatically available without a request in terms of the Act and are subject to one of the possible grounds of refusal as contemplated in chapter 4 of the Act.

8.1 Human Resources Department –

- 8.1.1 personnel information including personal information, employment history and health/medical records that the company may hold from time to time;
- 8.1.2 training and development information;
- 8.1.3 general files containing information on employee benefits and employee recruitment and selection information;
- 8.1.4 personnel files containing performance reviews, salary history, deductions, bonuses, promotions/demotions, training, attendance, references, transfers, applications and pre-employment evaluations;

- 8.1.5 payroll/salary information;
- 8.1.6 leave records;
- 8.1.7 unsuccessful application records;
- 8.1.8 salary/wage register and wage determination records;
- 8.1.9 salary revision schedules;
- 8.1.10 time, piecework and overtime records;
- 8.1.11 UIF records;
- 8.1.12 workmen's compensation records;
- 8.1.13 garnishee orders;
- 8.1.14 salary deduction authorisations;
- 8.1.15 employment contracts;
- 8.1.16 job descriptions;
- 8.1.17 performance management documentation;
- 8.1.18 disciplinary, grievance and arbitration records;
- 8.1.19 accident records.

8.2 Information Technology Department -

- 8.2.1 equipment details and manuals;
- 8.2.2 costings of hardware and software;
- 8.2.3 general contracts;
- 8.2.4 licensing agreements;
- 8.2.5 correspondence relating to agreements and contracts;
- 8.2.6 business requirement specifications;
- 8.2.7 systems analysis documentation;
- 8.2.8 systems design documentation;
- 8.2.9 systems procedures manuals;
- 8.2.10 systems interface specifications.

8.3 Finance Department -

- 8.3.1 company secretarial records;
- 8.3.2 financial records;
- 8.3.3 list of company's debtors and creditors;

- 8.3.4 salary information, register and records;
- 8.3.5 bank account information;
- 8.3.6 fixed assets register;
- 8.3.7 service level agreements;
- 8.3.8 intellectual property certificates;
- 8.3.9 operational agreements;
- 8.3.10 all relevant accounting records;
- 8.3.11 income tax records and taxation returns and assessments;
- 8.3.12 VAT records and documentation;
- 8.3.13 allotment sheets and return allotment sheets;
- 8.3.14 lease agreements;
- 8.3.15 rental agreements;
- 8.3.16 insurance contracts;
- 8.3.17 relevant correspondence regarding contracts and agreements.

8.4 Marketing Department -

- 8.4.1 company brochures and publications;
- 8.4.2 documents relating to public relations events;
- 8.4.3 company media releases;
- 8.4.4 website information;
- 8.4.5 advertising orders/contracts;
- 8.4.6 articles on Strate;
- 8.4.7 external and internal newsletters;

8.5 Legal Department -

- 8.5.1 contracts and agreements;
- 8.5.2 memorandums of understanding;
- 8.5.3 legal opinions;
- 8.5.4 business partner/client details and licenses;
- 8.5.5 intellectual property information and certificates;
- 8.5.6 relevant legislation, regulations, rules and directives;
- 8.5.7 documents pertaining to legal processes;
- 8.5.8 documents used or to be used in legal proceedings protected by attorney client privilege;
- 8.5.9 company documentation;
- 8.5.10 correspondence relating to contracts, agreements, licenses and legal opinions.

8.6 Business Operations Department –

- 8.6.1 business partners details and account information;
- 8.6.2 settlement instructions and allegements;
- 8.6.3 electronic securities statements;
- 8.6.4 exception reports.

8.7 Supervision Department –

- 8.7.1 contracts with service suppliers and consultants;
- 8.7.2 audio records of recorded telephone conversations;
- 8.7.3 correspondence with CSD Participants, FSB and statutory bodies;
- 8.7.4 list of penalties imposed on regulated bodies.

8.8 Corporate Actions Department –

- 8.8.1 details of listed company's corporate action events;
- 8.8.2 ancillary books of account;
- 8.8.3 bank instructions;
- 8.8.4 suspense account reconciliations;
- 8.8.5 instructions to increase/decrease company issued share capital;
- 8.8.6 CSD Participants instructions relating to events;
- 8.8.7 CSD Participants and broker voting instructions in respect of Plc companies.

8.9 Issuer and Asset Servicing Department –

- 8.9.1 beneficial owner information;
- 8.9.2 minutes of the following meetings: (a) Board (audit/risk/regulatory committees, (b) Shareholders, (c) DMF Trustees, (d) Manco;
- 8.9.3 equities dematerialisation schedules and associated correspondence;
- 8.9.4 warrants dematerialisation schedules and associated correspondence;
- 8.9.5 sub register information as sent to issuers;
- 8.9.6 text files as sent to transfer secretary.

9. PROCESS OF REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE

- 9.1 A request must be made on the prescribed form. A copy of the form is attached marked annexure “A” (“the prescribed form”).
- 9.2 The prescribed form should be submitted to the request liaison officer who will hand it to the head of the private body if required.
- 9.3 The same procedure as set out in 9.1 and 9.2 applies if the requester is requesting information on behalf of another person or on behalf of a permanent employee of the company.
- 9.4 The following fee should accompany the prescribed form –
 - 9.4.1 R50,00;
 - 9.4.2 If the head of the private body, or the request liaison officer is of the opinion that six hours will be exceeded to search, reproduce and/or prepare the information requested, a deposit is payable at an amount of R30, 00 for each hour or part thereof, exceeding six hours.
- 9.5 The head of a private body, as soon as reasonably possible and within thirty days after the request has been received, shall decide whether or not to grant the request.
- 9.6 The requester will be notified of the decision of the head of the private body or the request liaison officer in the prescribed form and manner indicated by the requester.
- 9.7 Notwithstanding the foregoing, the company will advise the requester in the manner stipulated by the requester in the prescribed form of –
 - 9.7.1 the access fee to be paid for the information (in accordance with paragraph 6.3);
 - 9.7.2 the format in which access will be given;
 - 9.7.3 the fact that the requester may lodge an appeal with the High Court against the access fee charged or the format in which access is to be granted.
- 9.8 After access is granted, actual access to the record requested will be given as soon as reasonably possible.
- 9.9 If the request for access is refused, the head of the private body or the request liaison officer shall advise requester in writing in a notice of refusal. The notice of refusal shall state –
 - 9.9.1 adequate reasons for the refusal;
 - 9.9.2 that the requester may lodge an appeal with the High court against the refusal of the request (including the period) for lodging such an appeal.

- 9.10 Upon refusal by the head of the private body or request liaison officer, the deposit paid by the requester will be refunded.
- 9.11 If the head of the private body or the request liaison officer fails to respond within thirty days after a request has been received, it is deemed, in terms of section 58 read together with section 56(1) of the Act, that the head of the private body or request liaison officer has refused the request.
- 9.12 The head of the private body may decide to extend the period of thirty days (“original period”) for another period of not more than thirty days if –
- 9.12.1 the request is for a large number of records;
 - 9.12.2 the search for the records is to be conducted at premises not situated in the same town or city as the head office of the company;
 - 9.12.3 consultation among divisions or departments, as the case may be, of the company is required;
 - 9.12.4 the requestor consents to such an extension in writing;
 - 9.12.5 the parties agree in any other manner to such an extension.
- 9.13 Should the company require an extension of time; the requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension.
- 9.14 The requester may lodge an appeal with the High Court against any extension or against any procedure set out in this section.

10. INFORMATION OR RECORDS NOT FOUND

- 10.1 If a requested record cannot be found or if the records do not exist, the head of the private body or the request liaison officer must, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record.
- 10.2 The affidavit or affirmation must provide a full account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the head of the private body or the request liaison officer with every person who conducted the search.
- 10.3 This notice will be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.

- 10.4 If the record should later be found, the requester must be given access to the record in the manner stipulated by the requester in the prescribed form unless access is refused by the head of the private body or the request liaison officer.
- 10.5 The attention of the requester is drawn to the provisions of Chapter 4 of the Act in terms of which the company may refuse, on certain specified grounds, to provide information to a requester.

11. INFORMATION REQUESTED ABOUT A THIRD PARTY

- 11.1 Section 71 of the Act makes provision for a request for information or records about a third party.
- 11.2 In considering such a request, the company will adhere to the provisions of sections 71 to 74 of the Act.
- 11.3 The attention of the requester is drawn to the provisions of Chapter 5, part 3 of the Act in terms of which the company is obliged, in certain circumstances, to advise third parties or requests lodged in respect of information applicable to or concerning such third parties. In addition, the provisions of chapter 2 of part 4 of the Act entitles third parties to dispute the decisions of the head of the private body or the request liaison officer by referring the matter to the high Court.

12. UPDATING OF THE MANUAL

The company will update this manual annually or at such intervals as may be necessary.

ANNEXURE

"A"

REQUEST FORM

1. REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000)

(Regulation 10)

A. Particulars of private body

Strate Proprietary Limited
3rd Floor
2 Gwen Lane
Sandown
Sandton
2196

P O Box 78608
Sandton
2146

Head: André Nortjé

Request liaison officer: Anne Njoroge

B. Particulars of person requesting access to the record

- | |
|--|
| <p>(a) The particulars of the person who requests access to the records must be recorded below.</p> <p>(b) Furnish an address and/or fax number in the Republic to which information must be sent.</p> |
|--|

(c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full name and surname:

Identity number:

Postal Address:

Telephone number: _____ Fax number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made:

This section must be completed only if a request for information is made on behalf of another person.

Full names and surname:

Identity number:

D. Particulars of record:

Promotion of Access to Information Act Manual

(a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.

(b) If the provided space is inadequate please continue on a separate folio and attach it to this form.

The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) The **fee payable for access** to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- (d) If you qualify for exemption of the payment of any fee, please state the reason therefore.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability from reading, viewing or listening to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
-------------	-----------------------------------

Mark the appropriate box with an "X"

NOTES:

- (a) Your indication as to the required form of access depends on the form in which the record is available.*
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.*
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.*

1. If the record is in written or printed form:

	Copy of record*		Inspection of record
--	-----------------	--	----------------------

2. If record consists of visual images:

	View the images		Copy of the images*		Transcription of the images*
--	-----------------	--	---------------------	--	------------------------------

3. If record consists of recorded words or information which can be reproduced in sound:

	Listen to the soundtrack (audio cassette)		Transcription of soundtrack* (written or printed document)
--	---	--	--

4. If record is held on computer or in an electronic or machine-readable form:			
Printed copy of Information derived from the record*		Copy in computer readable form* (stiffy or compact disc)	

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?

YES NO

<p>The copy or transcription to be posted to you?</p> <p>A postal fee is payable</p>		
---	--	--

G. Particulars of right to be exercised or protected:

If the provided space is inadequate, please continue on a separate folio and attach it to this form.
<i>The requester must sign all the additional folios</i>

1. Indicate which right is to be exercised or protected:

2. Explain why the requested record is required for the exercising or protection of the aforementioned right

H. Notice of decision regarding request for access:

You will be notified in writing whether your request has been approved/denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____

20_____

SIGNATURE OF REQUESTER/PERSON ON WHOSE BEHALF
REQUEST IS MADE