

PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000
SECTION 51 MANUAL

for Reunert Limited (Reg. No. 1913/004355/06)
including its subsidiaries

1. INTRODUCTION

The Promotion of Access to Information Act, No 2 of 2000 (“the Act”) was enacted on 3 February 2000, giving effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, except where the Act expressly provides that the information may or must not be released. The Act sets out the requisite procedural issues attached to such request.

2. PURPOSE OF THE MANUAL:

This manual is intended to foster a culture of transparency and accountability within Reunert and its subsidiary companies by giving effect to the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect their rights.

This manual sets out to provide a generic manual to Reunert and its subsidiaries to deal with the requests in a conforming manner, which will enable the requestors to obtain the records which they are entitled to in a quick, easy and accessible manner.

3. CONTACT INFORMATION

Information Officer: Gerrit Oosthuizen
Physical Address: Lincoln Wood Office Park, 6-10 Woodlands Drive, Woodmead, Sandton
Postal Address: P O Box 784391, Sandton, 2146
Tel: (011) 517-9000
Fax: (011) 804-5997
E-mail: gerrito@reunert.co.za
Websites: www.reunert.co.za

4. HUMAN RIGHTS COMMISSION – GUIDE ON USE OF ACT

In terms of section 10 of the Promotion of Access to Information Act 2 of 2000 (“Act”), the Human Rights Commission has compiled a guide on the use of this Act. It is available from the Human Rights Commission.

Address: Private Bag 2700, Houghton, 2041
Tel: 011 – 484 8300
Fax: 011- 484 1360
Website: www.sahrc.org.za
E-mail Address: PIAI@sahrc.org.za

5. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION (in terms of Section 51(1)(d))

Records can also be requested in terms of the following legislation applicable to the company.

- Basic Conditions of Employment Act No.75 of 1997
- Companies Act No 61 of 1973
- Income Tax Act 95 of 1967
- Labour Relations Act No 66 of 1995
- Occupational Health And Safety Act No. 85 of 1993
- Pension Funds Act No 24 of 1956
- Skills development Act No 97 of 1998
- Unemployment Insurance Act No 63 of 2001
- Usury Act No 73 of 1968
- Value Added Tax Act No 89 Of 1991

6. DESCRIPTION OF RECORDS HELD BY THE COMPANY

General

- Annual Reports
- General Contract documentation(distribution, agency, confidentiality agreements, license agreements, etc.)
- Records of Tenders awarded
- Records of Tender submissions not yet awarded
- Standard conditions of sale
- Credit Agreements
- Patents and Trade Marks
- Statutory Public Access Records
- Company Minutes
- Shareholder agreements / Share Schemes

Information Technology

- Policy Documents
- Infrastructure Blueprint
- Infrastructure Passwords

Security

- Policy and Procedures
- Entrance Control Records
- Risk analysis reports

Human Resources

- Staff Records
- Employment contracts/files
- Payroll reports
- Pay slips
- IRP5's
- Reconciliation
- Accident Reports
- Training Records
- Skills Development Plans and Reports
- Employment equity Plans and Reports
- Pension / Provident Fund Documentation

Taxation

- Income tax returns
- VAT Returns
- PAYE returns

- RSC Levy returns
- UIF returns

Financial

- Audited Financial Statements
- Management accounts
- General ledgers and subsidiary ledgers (including debtors, creditors, Stock and Fixed Assets)
- Creditors invoices
- Debtors invoices
- Goods received notes
- Stock sheets
- Journal entries
- Payments made (EFT or cheque)
- Deposit Slips
- Export documents
- Import documents (bill of entry etc.)
- Forward cover documents
- General Ledger

Production/Manufacturing

- Production Reports
- Production Statistics
- Project Plans & Meetings
- Product information
- Development documents
- Licensing
- Customer documents
- Research reports
- Strategic Documents (outputs from strat sessions)
- Costing, Budget, monthly estimates / forecasts
- Process and Procedures
- Work Instructions
- Development, Production standards
- Field service Reports
- Monthly Reports
- Fault Notifications
- Contract Documents & Plans
- Contractual Correspondence
- Commissioning & Handover Documents
- Design Review Records
- Design Verification
- Build History
- Qualification Test
- Reports (incl. Original test result sheets)
- Life time of Product tests
- Physical Configuration

Quality Assurance

- Quality Plans
- Quality Requirements
- Quality / Test Reports
- Product Release Reports
- Release Certificates
- Audit Reports
- Maintenance records
- Check Sheets

- Calibration test results

Product information

- Product specifications
- Marketing and sales material
- User Manuals
- Maintenance Manuals
- SABS Approvals
- Maintenance records

7. REQUEST PROCEDURE

The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.

The requester must complete the prescribed form as stipulated in the act and available from the Information Officer on request , and submit same as well as payment of a request fee and a deposit, if applicable, to the Information Officer at the postal or physical address, fax number or electronic mail address as stated in this manual.

The prescribed form must be filled in with enough particularity to at least enable the Information Officer to identify –

- The record or records requested;
- The identity of the requester,
- Which form of access is required, if the request is granted;
- The postal address or fax number of the requester.

The requester must state that he requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.

The Company will process the request within 30 days, unless the requester has stated special reasons, which would satisfy the Information officer, that circumstances dictate that the above time periods not be complied with.

The requester shall be informed whether access is granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he must state the manner and the particulars so required.

If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the information officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

8 DECISION TO GRANT OR DECLINE A REQUEST

Section 9 of the Act recognizes that the right to access to information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

- Limitations aimed at the reasonable protection of privacy;
- Commercial confidentiality; and
- Effective, efficient and good governance;

and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

The Company will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

The 30 day period may be extended for a further period of not more than 30 days if the request is for a large volume of information, or the request requires a search for information held at another office of the Company and the information cannot reasonably be obtained within the original 30 day period. The Company will notify the requester in writing should an extension be sought.

Requests for information that are clearly frivolous or vexation, or which involve an unreasonable diversion of resources shall be refused.

11. REMEDIES AVAILABLE WHEN A REQUEST IS REFUSED

The Company does not have internal appeal procedures. As such, the decision made by the information officer is final, and requestors will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the information officer.

A requester that is dissatisfied with an information officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a Court for relief. Likewise, a third party dissatisfied with an information officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to a Court for relief. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.