

TRELLIDOR HOLDINGS LIMITED

REGISTRATION NUMBER: 1970/015401/06

MANUAL FOR ACCESS TO INFORMATION

(Section 51 of the Promotion of Access to Information Act, No 2 of 2000)

1. INTRODUCTION

The Promotion of Access to Information Act 2 of 2002, herein after referred to as PAIA, gives effect to the constitutional right of access to any information in records held by a private or public body that is required for the exercise or protection of any rights. The required procedural issues regarding a request are set out in the PAIA. This also includes the grounds for refusal or partial refusal of such request. This manual outlines the mechanisms to be followed by a requester of information as prescribed by PAIA.

The Act recognises that the right to access 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
- effective, efficient and good governance and
- in a manner which balances that right with any other rights contained in the Bill of Rights in the Constitution of South Africa.

In this manual, a requester will be able to view the categories of information which the Company possesses and the procedure to follow to request access to such information.

2. SCOPE AND PURPOSE OF MANUAL

The purpose of this manual is to inform requesters of the procedural and other requirements which a request for information must meet as prescribed by the Act. Trellidor Holdings Limited (“the Company”, “we” or “us” refers to Trellidor Holdings Limited) is a registered company in accordance with the laws of the Republic of South Africa. This manual will cover the records of the Company.

Comprising two main trading brands, Trellidor and Taylor, is the leading manufacturer of custom-made solutions with an extensive franchisee and distributor network that spans South Africa, Africa, United Kingdom, Israel, and European countries. Annexure A to this manual lists all Directors of the Company.

3. PERSONAL INFORMATION

3.1 The categories of data subjects and of the information or categories of information relating thereto:

- Employees or contract employees of the Company
- Client and related parties of clients of the Company
- Contractors, suppliers, and services providers of the Company
- Business partners of the Company

This list of data subjects may change from time to time and cannot be construed as an exhaustive list.

3.2 The recipient or categories of recipients to whom the personal information may be supplied

The data collected and processed by the Company may be shared with the following persons external to the Company:

- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules
- Auditing and accounting bodies (internal and external)
- Anyone making a successful application for access in terms of PAIA.

4. CONTACT DETAILS OF THE INFORMATION OFFICER

All requests for access to records in terms of the Act for the Company must be in writing and must be addressed to the Information Officer at the below contact details:

Name of Private Body: Trellidor Holdings Limited
Information Officer: Damian Judge
Physical address: 20 Aberdare Drive, Phoenix Industrial Park KwaZulu-Natal, South Africa
Postal Address: 20 Aberdare Drive, Phoenix Industrial Park KwaZulu-Natal, South Africa
Contact number: +27 31 508 0800
Email: djudge@trellidor.co.za

5. SECTION 10 GUIDE (SECTION 51 of PAIA)

The Information Regulator has compiled the guide referred to in Section 10 of PAIA which contains information as may reasonably be required of any person who wishes to exercise any right contemplated in the Act. The guide is available on the Information Regulator website (<https://eservices.inforegulator.org.za/contact.aspx>) and available for inspection at their physical address below.

The contact details of the Information Regulator are:

Telephone Number : (010) 023 5200
Email: enquiries@inforegulator.org.za
Website : <https://eservices.inforegulator.org.za/contact.aspx>
Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

For more information and enquiries:

General enquiries: enquiries@inforegulator.org.za
Information Officers: registration.IO@inforegulator.org.za
Prior Authorisation: PAIACompliance@inforegulator.org.za
Complaints: PAIAComplaints@inforegulator.org.za

6. RECORDS OF TRELIDOR HOLDINGS LIMITED

This section serves as a reference to the records that the Company holds to facilitate a request in terms of the Act.

Please note that accessibility of the records below may be subject to the grounds of refusal which is set out in section 7 of this manual. The information is classified and grouped according to records relating to the following subject and categories:

6.1 Personnel records

"Personnel" refers to any person who works for or provides services to or on behalf of the Company and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company. This includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff, as well as contract workers and is noted as follows:

- Personal records provided by personnel
- Records provided by a third party relating to personnel
- Conditions of employment and other personnel-related contractual and quasi-legal records
- Internal evaluation records and other internal records
- Correspondence relating to personnel
- Training schedules and materials

6.2 Customer related records

A "customer" refers to any natural or juristic entity that receives services from the Company and is noted as follows:

- Records provided by a customer to a third party acting for or on behalf of the Company;
- Records provided by a third party.
- Records generated by or within the Company pertaining to its customers, including transaction records.

6.3 Trellidor Holdings Limited Records

The Company's records are noted as follows:

- Agreements and contracts
- Financial records
- Operational records
- Databases
- Statutory records
- Information technology
- Marketing records
- Internal policies, procedures, and correspondence
- Product records
- Records held by officials of the Company.

These records include but are not limited to the records which pertain to the Company's own affairs.

The Company may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to the Company.

6.4 Information Automatically Available (In terms of section 51 of PAIA)

No notices have been published on the categories of records automatically available without a person having to request access thereto in terms of the Act. The following records are however automatically available to any person requesting this information and it is therefore not necessary to apply for access in terms of this Act.

- Trellidor Holdings Limited Annual Financial Statements
- Other information freely available on the Company's website
- Any publication of the Company in a publicly available forum
- Customer Records and Credit Services
- Documentation on Taxation
- Documentation on Employment Equity and Black Economic Empowerment
- Environmental, Health and Safety Records
- Employment Records and Human Resources Information
- Information Technology Records
- Insurance Information
- Legal Records
- Marketing Information
- Operational Records
- Pension/Provident Fund Details
- HR Policy Documents
- Property Records and Documents of Title
- Share Scheme Information
- Statutory Records and Information
- Supplier Records
- Trademarks, Patents and Designs
- Correspondence and Memoranda
- Any records that are required to be made available in terms of the Companies Act No. 71 of 2008 and the listing requirements as laid down by the JSE, as amended from time to time, shall be made available for inspection by interested parties.

7. GROUND FOR REFUSAL OF ACCESS TO RECORDS

Access to certain records may be or must be denied on the grounds set out in the Act. This includes:

- Mandatory protection of privacy of a third party who is a natural person;
- Mandatory protection of commercial information of third party;
- Mandatory protection of certain confidential information of third party;
- Mandatory protection of safety of individuals, and protection of property;
- Mandatory protection of records privileged from production in legal proceedings;
- Commercial information of private body.

- Mandatory protection of research information of third party, and protection of research information of privacy body.
- Requests for information that are clearly frivolous or vexatious or which involve an unreasonable diversion of resources shall be refused.

8. REQUEST PROCEDURES

- 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 available on the website of the INFORMATION REGULATOR at <https://eservices.inforegulator.org.za/> and submit same as well as payment of a request fee and a deposit, if applicable, to the Information Officer using the contact details provided in this Manual.
- The prescribed form which is also available on the Information Regulator's website (<https://eservices.inforegulator.org.za/>) and the Department of Justice and Constitutional Development's website (www.doj.gov.za) must be filled in with enough particularity to at least enable the Information Officer to identify:
 - Record or records requested.
 - The identity of the requester.
 - Which form of access is required if the request is granted.
 - The postal address or facsimile number of the requester.
- The requester must state the nature of the right for which access to the requested records is required. The courts have indicated that access to the records must be 'necessary' for the exercise or protection of the right so stated.
- The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, the requester 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 verbally.
- The requester must pay the prescribed fee before any further processing can take place.

9. APPLICABLE TIME PERIODS

- Subject to the provisions in the Act in respect of extensions, the Company will process the request within 30 business days, unless the requestor has stated special reasons which would satisfy the Information Officer that circumstances dictate that the above time periods not be complied with.

- The 30-business day period may be extended by a further period of not more than 30 business days if the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of the Company or the records are not located at the Company, or consultations amongst divisions and/or subsidiaries of the Company or another private body are required.

10. ACCESS TO RECORDS HELD BY THE COMPANY

- Records held by the Company may be accessed by requests only once the prerequisite requirements for access have been met as per the preceding paragraphs in this Manual.
- A requester is any person making a request for access to a record of the Company.
- Other requester – This requester (other than a personal requester) is entitled to request access to information on third parties. However, the Company is not obliged to grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee.

11. FEES

The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee.
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

When the request is received by the Information Officer, such officer shall by notice require the requester to pay the prescribed request fee (if any) before further processing of the request. Refer to Annexure B of this Manual.

If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion (being not more than one third) of the access fee which would be payable if the request is granted.

The Information Officer shall withhold a record until the requester has paid the fees as indicated in Annexure B. The requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the request fee or a deposit.

A requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

12. DECISION

The Company will, within 30 business days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect. If a request for access is granted, such notice will advise of the access fee; the form in which access will be given and that the requestor may take action against the fee, the form of access and the procedure (including the period allowed) for lodging an application.

The 30-business day period with which the Company has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty business days if the request is for a large amount 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 within thirty business days of receipt of the request, in writing should an extension be sought, the period of the extension, the reasons therefore and the available action the requester may take by lodging a complaint to the Information Regulator or an application to court.

13. REMEDIES AVAILABLE WHEN THE COMPANY REFUSES A REQUEST FOR INFORMATION

Internal Remedies

The Company does not have an internal appeal procedure, therefore the decision made by the Information Officer is final and requesters will have to exercise such external remedies if the request for information is refused and the requester is not satisfied with the answer supplied by the Information Officer.

External Remedies

Subject to the provisions of the Act, a requestor that is dissatisfied with an Information Officer's refusal to disclose information, may within 30 business days of notification of the decision, lodge a complaint to the Information Regulator or 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 180 business days of notification of the decision, apply to a Court with appropriate jurisdiction for relief. The Constitutional Court, High Court or other court of similar status has jurisdiction over these applications.

14. AVAILABILITY OF THE MANUAL

The manual is made available on the Company's website; at the address specified in section 4 of this Manual or can be accessed by requesting a copy by e-mail from the Company's Information Officer (*in terms of Regulation Number R. 187 of 15 February 2002.*)

DIRECTORS

SURNAME	NAME	DESIGNATION
DENNISON	TERENCE MARK	DIRECTOR
JUDGE	DAMIAN JAMES ROBERT	DIRECTOR
HODGSON	KEVIN GRAHAM	INDEPENDENT NON-EXECUTIVE DIRECTOR
PATMORE	RALPH BRUCE	INDEPENDENT NON- EXECUTIVE DIRECTOR
BIRD	STUART IAN	INDEPENDENT NON-EXECUTIVE DIRECTOR

ANNEXURE B

PRESCRIBED FEES

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) to the Act is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fee for reproduction referred to in regulation 11(1) to the Act are as follows:
 - (a) For every photocopy of an A4-size page or part thereof R 1,10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R 0,75
 - (c) For a copy in a computer-readable form on a USB removable drive 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
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) to the **Act is R50,00.**
4. The access fees payable by a requester referred to in section 54(7) of the **Act**, unless exempted under regulation 11(3) to the **Act**, are as follows:
 - (a) For every photocopy of an A4-size page or part thereof R 1,10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form. R 0,75
 - (c) For a copy in a computer-readable form on a USB removable drive 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
 - (f) To search for the record for disclosure, for each hour or part of an hour reasonably required for such search. R30,00
5. The actual postal fee is payable when a copy of a record must be posted to a requester.
6. For the 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