



POLICY AND PROCEDURES

Document Title	: Pepkor Promotion of Access to Information (PAIA) Manual	
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PEPKOR HOLDINGS LIMITED

REGISTRATION NUMBER 2017/221869/06

(*"The Company" or "Pepkor"*)

PAIA MANUAL

Manual prepared in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000, (the "Act") for Pepkor Holdings Limited (*"Pepkor" or "the Company"*) and its material subsidiaries.

Board of directors of Pepkor

Refer to Pepkor website: <https://pepkor.co.za/directors/>

List of material subsidiaries

- Flash Mobile Vending Proprietary Limited – registration number: 2010/000777/07
- JD Group Limited – registration number: 1981/009108/06
- Pepkor Holdings Proprietary Limited – registration number: 2003/020009/07
- Pepkor Proprietary Limited – registration number: 1965/007765/07
- Pepkor Trading Proprietary Limited – registration number: 1958/003362/07
- Steinhoff Doors and Building Materials Proprietary Limited – registration number: 1972/004708/07
- SA Poco Retail Proprietary Limited – registration number: 1996/011662/07
- Tekkie Town Proprietary Limited – registration number: 2007/020629/07

1. Introduction

The Act, together with all relevant legislation, provides for the right of access to information held by public and private bodies when such information is requested for the exercise of protection of any rights.

This manual has been compiled to inform and assist any potential requesters of the procedural and other requirements which a request for information must meet as prescribed by the Act.

2. Overview of Pepkor

Pepkor is a public company listed on the Johannesburg Stock Exchange. The Pepkor Group through its various brands is a retailer focused on discount, value and specialised goods that retails general merchandise, clothing, household goods, furniture, appliances, consumer electronics, building materials, cellular products and services, and financial services in Angola, Botswana, Lesotho, Mozambique, Malawi, Namibia, Nigeria, South Africa, Swaziland, Uganda, Zambia and Zimbabwe.

The Pepkor Group sells its products and services through two sales channels: (a) Discount and Value and (b) Speciality.

3. Information required in terms of section 51(1)(a) of the act

Pepkor Holdings Limited, Registration number 2017/221869/06

Registered address	36 Stellenberg Road, Parow Industria, 7493
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Physical address	36 Stellenberg Road, Parow Industria, 7493
Postal address	PO Box 6100, Parow East, 7501
Telephone number	+27 21 929 4800
Fax number	086 619 0976
Chief executive officer	Leon Marius Lourens 36 Stellenberg Road, Parow Industria, Parow, 7493 PO Box 6100, Parow East, 7501 Tel: +27 21 937 2777 Email: leonlo@pepkor.co.za
Public information officer	The Company Secretary 36 Stellenberg Road, Parow Industria, 7493 PO Box 6100, Parow East, 7501 Tel: +27 21 929 4800 Email: arend@pepkor.co.za

4. Section 10 guide

The Act requires the South African Human Rights Commission (“**SAHRC**”) to compile a guide to be available in each official language, to assist individuals in understanding how to exercise their rights contained in the Act.

Any queries regarding this guide can be addressed directly to the **SAHRC** at:

The South African Human Rights Commission
PAIA Unit – The Research and Development Department
Braampark Forum 3,
33 Hoofd Street,
Braamfontein

Private Bag x 2700, Houghton 2041
Tel: +27 11 484 8300
Fax: + 27 11 484 0582
Email: paia@sahrc.org.za
Website: www.sahrc.org.za

5. Categories of data subjects and the information the Pepkor Group may collect

5.1 Employees

- Name and contact details
- Identity number and identity documents including passports
- Employment history and references
- Banking and financial details
- Details of payments to third parties (deductions from salary)
- Employment contracts
- Employment equity plans
- Medical aid records
- Pension Fund records
- Remuneration/salary records
- Performance appraisals
- Disciplinary records

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- Leave records
- Training records

5.2 Consumers and prospective consumers (which may include employees)

- Postal and/or street address
- title and name
- contact numbers and/or e-mail address
- ethnic group
- employment history
- age
- gender
- marital status
- nationality
- language
- financial information
- identity or passport number
- browsing habits and click patterns on Pepkor Group websites.

5.3 Vendors /suppliers /other businesses:

- Name and contact details
- Identity and/or company information and directors' information
- Banking and financial information
- Information about products or services
- Other information not specified, reasonably required to be processed for business operations

6. Purpose of processing personal information for each category of data subject

6.1 For consumers:

- Performing duties in terms of any agreement with consumers
- Make, or assist in making, credit decisions about consumers
- Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with the Pepkor Group
- Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about Pepkor Group's products and services, unless consumers indicate otherwise
- To form a view of consumers as individuals and to identify, develop or improve products, that may be of interest to consumers
- Carrying out market research, business and statistical analysis
- Performing other administrative and operational purposes including the testing of systems
- Recovering any debt consumers may owe the Pepkor Group
- Complying with the Pepkor Group's regulatory and other obligations
- Any other reasonably required purpose relating to the Pepkor Group business

6.2 For prospective consumers:

- Verifying and updating information
- Pre-scoring
- Direct marketing

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- Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Pepkor Group's business.

6.3 For employees:

- The same purposes as for consumers (above)
- Verification of applicant employees' information during recruitment process
- General matters relating to employees:
 - o Pension
 - o Medical aid
 - o Payroll
 - o Disciplinary action
 - o Training
- Any other reasonably required purpose relating to the employment or possible employment relationship.

6.4 For vendors /suppliers /other businesses:

- Verifying information and performing checks;
- Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- Payment of invoices;
- Complying with the Pepkor Group's regulatory and other obligations; and
- Any other reasonably required purpose relating to the Pepkor Group's business.

7. Recipients or categories of recipients to whom the personal information may be supplied

- Any firm, organisation or person that the Pepkor Group uses to collect payments and recover debts or to provide a service on its behalf;
- Any firm, organisation or person that/who provides the Pepkor Group with products or services;
- Any person who the Pepkor Group has reason to believe to be a data subject's/consumer's parent, carer or helper where he/she is unable to handle his/her own affairs because of mental incapacity or other similar issues;
- Any payment system the Pepkor Group uses;
- Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the Pepkor Group has a duty to share information;
- Credit bureaux;
- Third parties to whom payments are made on behalf of employees;
- Financial institutions from whom payments are received on behalf of data subjects;
- Any other operator not specified;
- Employees, contractors and temporary staff; and
- Agents.

8. Planned cross border flows of personal information

- Storing information electronically; and
- Making use of third party service providers to fulfil a business function on behalf of the Pepkor Group.

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9. Records are kept in terms of the following legislation

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Criminal Procedure Act 51 of 1977
- Customs and Excise Act 91 of 1964
- Customs Duty Act 30 of 2014
- Debt Collectors Act 114 of 1998
- Domicile Act 3 of 1992
- Employment Equity Act 55 of 1998
- Electronic Communications and Transactions Act 25 of 2002
- Electronic Communications Act, 36 of 2005
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Financial Markets Act 19 of 2012
- Johannesburg Stock Exchange listing requirements
- Income Tax Act 58 of 1962
- Intellectual Property Laws Amendments Act 38 of 1997
- Labour Relations Act 66 of 1995
- Merchandise Marks Act 17 of 1941
- National Credit Act 34 of 2005
- National Payment System Act 78 of 1998
- Occupational Health and Safety Act 85 of 1993
- Pension Fund Act 24 of 1956
- Prevention of Organised Crime Act 121 of 1998
- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protected Disclosures Act 26 of 2000
- Skill Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Tax Administration Act 28 of 2011
- Tax Administration Laws Amendment Act 44 of 2014
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991
- Such other legislation as may from time to time be applicable

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10. Notice in terms of section 51(1)(c)

No notice has been published to date in terms of Section 51(1)(c) of the Act. The following records are however automatically available on Pepkor's website (as from date of first reporting) to any person requesting this information and it is therefore not necessary to apply for access thereto in terms of the Act:

- Pepkor's Integrated Report
- Interim Results
- Corporate Governance reports and policies
- Corporate Responsibility report

11. Records held by Pepkor in terms of section 51(1)(e)

Statutory

- Memoranda of Incorporation
- Company Registers
- Statutory records and returns
- Agreements
- Trademarks and Patents
- Title Deeds

Admin, Finance and Accounting

- Accounting records
- Policies and procedures
- Banking details and bank statements
- Financial Statements
- Income Tax

Human Resources

- Policies and Procedures
- Employment equity plans
- Pension and Provident Fund details
- Skills development plans
- Records and reports

Operations

- Permits, licenses, consents, approvals, authorisations, applications and registrations
- Policies and procedures
- Reports and supporting documentation
- Contractor, client and supplier agreements and information
- Documentation on Customs and Excise
- Environmental, Health and Safety records

Information technology:

- System documentation and manuals
- Project, disaster recovery and implementation plans

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Corporate Social Investment (CSI):

- CSI Application for funding
- CSI schedule of projects/record of organisations that receive funding
- Reports, books, publications and general information related to CSI spend
- Records and contracts of agreement with funded organisations

Note that the accessibility of the records may be subject to the grounds of refusal set out in this manual. Amongst others, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to the normal requirements, before Pepkor will consider access.

Furthermore it should be noted that not all records are maintained at a head office level and would need to be sourced from the applicable division/business within the permitted response time.

12. Procedure for request for access (Sections 53 to 57 and 60 of the Act)

- 12.1 To request a document that does fall within the ambit of the Act, the requester must complete the prescribed form as set out in Annexure A (form C) hereto and submit same to the Information Officer via the contact details listed under B above.
- 12.2 The prescribed form must be completed with sufficient detail to enable the Information Officer to clearly identify the record/s requested, the requester's identity and which form of access to the records is required, should the request be granted. The requester must explain what other right is being protected or exercised.
- 12.3 If the request is being made on behalf of another person, the requester must submit proof, to the satisfaction of the Information Officer, of the capacity in which they are making the request.
- 12.4 The Information Officer will process the request and notify the requester of its decision whether or not the request has been granted. Should the request be granted, the notice will state the access fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to public and private bodies can be accessed on www.sahc.org.za.
- 12.5 Should the request be refused, the notice will state adequate reasons for the refusal.

13. Records not found or non-existent

If the company has searched for a record and believe that it either does not exist or cannot be found, the company will notify the requester by way of an affidavit or affirmation that it is not possible to provide access to the requested record due to its inability to locate it. The company will also provide the requester with details on the steps that were taken to try to locate the record and will confirm to the requester that, if at a later stage the record is located, the company will grant the requester access, provided that access is not prohibited in terms of Chapter 4 of Part 3 of the Act.

14. Grounds for refusal of access to records (Sections 63 to 69 of the Act and the Protection of Personal Information Act No. 4 of 2013)

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;

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- Commercial information of private body;
- Mandatory protection of research information of third party, and protection of research information of privacy body.

15. Availability of the manual

Copies of this manual are available for inspection, free of charge, at the registered offices of Pepkor. Copies are also available from the South African Human Rights Commission and on our website (www.pepkor.co.za).

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ANNEXURE A

REQUEST FOR ACCESS TO THE RECORD OF A PRIVATE BODY
Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)

[Regulation 10]

FORM C

A. Particulars of private body

The Head: _____

B. Particulars of person requesting access to the record

- | |
|--|
| <p>a) <i>The particulars of the person who requests access to the record must be given below.</i></p> <p>b) <i>The address and/or fax number in the Republic to which the information is to be sent must be given.</i></p> <p>c) <i>Proof of the capacity in which the request is made, if applicable, must be attached.</i></p> |
|--|

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____ Telephone number: _____

Fax number: _____

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

C. Particulars of person on whose behalf request is made

<p><i>This section must be completed ONLY if a request for information is made on behalf of another person.</i></p>

Full names and surname: _____

Identity number: _____

D. Particulars of record

- | |
|---|
| <p>a) <i>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.</i></p> <p>b) <i>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.</i></p> |
|---|

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

2. Reference number, if available: _____

3. Any further particulars of record: _____

ANNEXURE A

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 for exemption.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen 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) Compliance with your request in the specified form may depend 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 for 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

(This includes photographs, slides, video recordings, computer-generated images, sketches, etc)

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 (CD)

Transcription of soundtrack*

4. If record is held on computer or in an electronic or machine-readable form:

Printed copy of record*

Printed copy of information derived from record*

Copy in computer readable form*(CD)

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

YES

NO

ANNEXURE A

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. **The requester must sign all the additional folios.***

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

2. Explain why the record requested is required for the exercise 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 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 BEHALF OF WHOM REQUEST IS MADE