PROMOTION OF ACCESS TO INFORMATION ACT

Section 51 Manual

for

INTO SA LIMITED

CIPC Registration No. 2013/062791/06
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1. INTRODUCTION

This Manual is published in terms of s51 of the Promotion of Access to Information Act, Act 2 of 2000 as amended. The Act gives effect to the provisions of s32 of the Constitution, Act 108 of 1996, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and / or protection of any right.

The reference to any information in addition to that specifically required in terms of s51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

This manual applies in respect of each member of Into SA Limited and the Information Officer named below is appointed in respect of Into SA Limited.

2. DEFINITIONS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them hereunder, namely –

a. “Act” means the Promotion of Access to Information Act, Act 2 of 2000, as amended from time to time;

b. “Information Officer” means for the time being Ms. Princess T Nyoka, the person acting on behalf of Into SA Limited and discharging the duties and responsibilities assigned to the CEO of Into SA Limited by the Act. The Information Officer is duly authorised to act as such and such authorisation has been confirmed by the CEO of Into SA Limited in writing;

c. “Manual” means this manual published in compliance with s51 of the Act;

d. “Personnel” means any person who works for or provides services to or on behalf of Into SA Limited and receives or is entitled to receive any remuneration. This includes, without limitation, directors (both executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;

e. “Record” means any recorded information, regardless of form or medium, which is in the possession or under the control of Into SA Limited, irrespective of whether it was created by Into SA Limited or not;

f. “Request” means a request for access to a record of Into SA Limited;

g. “Requestor” means any person, including a public body or an official thereof, making a request for access to a record of Into SA Limited and includes any person acting on behalf of that person;


Unless a contrary intention clearly appears, words signifying:-

i. the singular includes the plural and vice versa;

j. any one gender includes the other genders and vice versa; and

k. natural persons include juristic persons.

Terms defined in the Act shall have the same meaning in this Manual.
3. INTO SA LIMITED OVERVIEW

GENERAL INDUSTRY

Established in 1995, INTO SA assists foreign companies venturing with their brands and products into Sub-Saharan Africa, by offering a safe and sound legal framework for doing business safe and successfully. INTO SA provides assistance and services [eAFRICA Services] in all aspects of Company Set-Ups, Immigration Visas to any Sub-Sahara African destination, facilitation of all Tax Registrations, Business & Sector Licenses as well as strategic guidance to comply with local empowerment legislations such as BEE (South Africa) or CEE (Zambia).

INTO SA is your multi-disciplinary Advisory Partner, who provides any business with the Experience, Transparency and Integrity to succeed in Sub-Saharan Africa. In South African the company and all its branches are recognised to be a BEE Contributor Level 1 and provide all clients with a dedicated multi-lingual team of legal, fiscal and economic experts, collectively benefitting from over one hundred years of university education and experience. More than Three Hundred Successful Business Establishments with a total investment of just over Eight Billion South African Rand give testimony to the fact that providing new ventures with old knowledge will inevitably lead to success.

Furthermore Into SA operates with the [eAFRICA Platform] a unique gateway to access any market in Sub-Saharan Africa. Whether it is African Government tenders or contacts to or the establishment of own distribution channels and networks, the membership in this Platform ensures that the experience and the knowledge specific to each country enabled is our clients’ companion on every step of the way into a new African market.

Into SA offers an extensive Information Library, which offers the Laws of Sub-Saharan Africa [eLAW], Information Leaflets on local legal issues [eINFO] and an overview over bilateral treaties for each country in Sub-Saharan Africa [eTREATY].

COMPANY STRUCTURE

Into SA consists of a parent holding company in South Africa and various subsidiaries.

Into SA Limited was established in South Africa, which explains their relationship in the vertical Group Structure:
Into SA Limited supports the constitutional right of access to information and is committed to provide access to their records in accordance with the provisions of the Act, the confidentiality owed to third parties and the principles of the South African law.

4. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available by sending a request for a copy to the Information Officer by email. The Manual may also be inspected at the SAHRC at the respective addresses set out below or obtained from the Government Printers. This Manual will be updated from time to time, as and when required.

5. HOW TO REQUEST ACCESS TO RECORDS HELD BY INTO SA LIMITED

Requests for access to records held by Into SA Limited must be made on the request forms that are available from the SAHRC website (www.sahrc.org.za) or the Department of Justice and Constitutional Development (www.doj.gov.za) (under “regulations”). For the convenience of requestors, copies of such forms are included in the version of this Manual available at the head office and on the company website. Please note that requestors are also required to make payment of the prescribed fees. This issue is dealt with more fully below.
Requests for access to records must be made to our Information Officer at the address, fax number or electronic mail address provided for below. The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.

If a request is made on behalf of a person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of Into SA Limited’s Information Officers.

The standard form that must be used for the making of requests is attached as Annexure 2. Not using this form could cause a request to be refused (if sufficient information is not provided) or delayed.

Annexure 2 is included in copies of this Manual available at Into SA Limited Head Office but need not be and are not included in the copies of this Manual published in the Government Gazette and delivered to the SAHRC.

Kindly note that all requests to Into SA Limited or any of its constituent companies will be evaluated and considered in accordance with the Act.

Publication of this manual and describing the categories and subject matter of information held by Into SA Limited does not give rise to any rights (in contract or otherwise) to access such information or records except in terms of the Act.

6. CONTACT DETAILS

<table>
<thead>
<tr>
<th>Name of Private Body</th>
<th>INTO SA LIMITED</th>
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<tbody>
<tr>
<td>Designated Information Officers</td>
<td>Princess T Nyoka</td>
</tr>
<tr>
<td>Email Address of Information Officers</td>
<td><a href="mailto:princess.nyoka@into-sa.com">princess.nyoka@into-sa.com</a></td>
</tr>
</tbody>
</table>
| Postal Address | 1024 Cisticola Avenue  
Zambezi Country Estate  
Sefako Makgatho Drive  
Montana 0151 |
| Street Address | 1024 Cisticola Avenue  
Zambezi Country Estate  
Sefako Makgatho Drive  
Montana 0151 |
| Landline Telephone Number | +27 (0)12 944 1508 |
| Cellular Telephone Number | +27 (0)62 368 6723 |
| Fax Number | +27 (0)86 214 2000 |
7. HOW TO ACCESS THE GUIDE AS DESCRIBED IN s10 OF THE ACT

The guide can be obtained from the South African Human Rights Commission. Please direct any queries to:

The South African Human Rights Commission - PAIA Unit -
The Research and Documentation Department
Postal Address: Private Bag 2700, Houghton 2041
Telephone: +27 11 484-8300
Fax: +27 11 484-0582
Website: www.sahrc.org.za
E-mail: paia@sahrc.org.za

8. VOLUNTARY DISCLOSURE

Into SA Limited is not obliged to and has not published a notice in terms of s52(2) of the Act. Nevertheless Into SA Limited does make certain information freely available, including the most recent Annual Report.

9. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

Information is retained in terms of the following legislation and is usually available only to the persons or entities specified in such legislation:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Broad-Based Black Economic Empowerment Codes of Good Practice 2013, 2015
- Business Names Act 27 of 1960
- Business Act 71 of 1991
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Currency & Exchange Act 9 of 1933
- Electricity Regulation Act 4 of 2006
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Immigration Act 13 of 2002
- Immigration Amendment Act 33 of 2011
- Immigration Regulations 2014
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Labour Relations Amendment Act 6 of 2014
- Medical Schemes Act 131 of 1998
- National Environmental Management Act 107 of 1998
- Occupational Health & Safety Act 85 of 1993
- Promotion of Access to Information Act 95 of 2000
- Protection of Personal Information Act 4 of 2013
- Public Procurement Policy Framework Act (Regulations) 2011
- Skills Development Act 37 of 2008
- Tax Administration Act 28 of 2011
- Telecommunications Act 103 of 1996
- Trade Marks Act No.194 of 1993
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 30 of 1966
- Value-added Tax Act 89 of 1991
10. RECORDS HELD BY INTO SA LIMITED

The company maintains records on the following categories and subject matters. However, 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 the Act.

INTERNAL RECORDS

The following are records pertaining to Into SA Limited’s own affairs and those of its constituent companies:

- Memorandum of Incorporation
- Shareholder Register
- Financial Records
- Operational Records
- Intellectual Property & Graphic Logo and Trademark Files
- Records held by officials of the Into SA Limited
- Internal Correspondence
- Product Records
- Statutory records
- Internal Policies and Procedures

PERSONNEL RECORDS

Personnel records include the following:

- Any personal records provided to Into SA Limited by its personnel;
- Any records a third party has provided to Into SA Limited about any of its personnel, including Employment contracts;
- Conditions of employment and other personnel-related contractual and quasi-legal records, including job descriptions;
- Internal evaluation records; and
- Other internal records and correspondence.

CUSTOMER-RELATED RECORDS

Customer-related information includes the following:

- Any records a customer has provided to Into SA Limited or a third party acting for or on behalf of Into SA Limited
- Any credit records or other research conducted by Into SA Limited in respect of its customers or research derived by Into SA Limited from its customers and their activities;
- Any records a third party has provided to Into SA Limited either directly or indirectly; and
- Records generated by or within Into SA Limited pertaining to the customer, including transactional records.
RECORDS IN RESPECT OF OTHER PARTIES
Records are kept in respect of other parties, including without limitation contractors, commercial banks, auditors and consultants, suppliers, joint venture companies and service providers, and general market conditions. In addition, such other parties may possess records which can be said to belong to Into SA Limited the following records fall under this category:

✓ Personnel, customer, or Into SA Limited records which are held by another party as opposed to being held by Into SA Limited; and
✓ Records held by Into SA Limited 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.

OTHER RECORDS
Further records are held including:

✓ Information relating to Into SA Limited’s own commercial activities; and
✓ Research information belonging to Into SA Limited’s or carried out on behalf of a third party.

Montana, the 1st of JANUARY 2018

PRESCRIBED FEES
The following applies to requests (other than personal requests):

1 A requestor is required to pay the prescribed fees (ZAR 50.00) before a request will be processed.
2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
4 Records may be withheld until the fees have been paid.
5 The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.