

Promotion of Access to Information Act

(Act 2 of 2000) ("the Act")

PEPKOR HOLDINGS LIMITED
REGISTRATION NUMBER 2003/020009/06
("Pepkor" or "the Company")
and its subsidiaries
("the Pepkor Group")

22 December 2011
Manual:Version 4

1. The Human Rights Commission is responsible for compiling a guide that provides details on how to use the Act. Please direct any further queries in this regard to:
The South African Human Rights Commission.

PAIA Unit
The Research and Documentation Department
Postal Address: Private Bag 2700
Houghton
2041
Phone: (011) 484 8300
Fax: (011) 484 0582
e-mail: dmalesa@sahrc.org.za or PAIA@zahrc.org.za
Website: www.sahrc.org.za

In terms of Section 51(1) of the Act, all heads of private bodies are required to compile a manual that provides information regarding the subjects and categories of records held by such private bodies. This manual is intended to fulfill this requirement.

2. Pepkor is a South African based investment holding company managing retail interests in Africa, Australia and Poland. It is focused on a cash retail value market and, through its operating subsidiaries, all strongly positioned in their individual niche markets; it satisfies consumers' basic needs for clothing at affordable prices. Appendix A provides a complete list of South African companies forming part of the Pepkor Group structure. The scope of this manual is limited to operational companies marked "active" as per Appendix A. All other companies are either holding companies or dormant.
3. The company supports the supply and availability of information as contemplated in the Act.
4. The Secretary of the company is duly authorized to ensure that the requirements of the Act are administered in a fair, objective and unbiased manner. Accordingly, all requests for access to records should be addressed to:

The Information Officer: The Secretary
Postal address: P O Box 6100, Parow East, 7501
Physical address: 36 Stellenberg Road, Parow Industria, 7493
Phone number: 021 929 4800
Fax number: 021 929 4785
e-mail address: pepkor@pepkor.co.za

5. The records can be found in various forms including electronic and paper. In terms of the Act access must be granted irrespective of form or medium.
6. The table below provides an indication of the subjects of information that the company holds and the corresponding categories:

Subject	Category	Publicly available/not
Finance	▪ Share records (registers, transfers, disclosures etc.)	Yes
	▪ Accounting records and asset registers	No
	▪ Statements of Accounts	Yes
	▪ General Correspondence	No
Sales and marketing	▪ Product Information (e.g. pricing)	Yes
	▪ Sales statistics	No
	▪ Product Brochures	Yes
	▪ Marketing Information	No
	▪ General Correspondence	No
Human resources	▪ Employee records	No
	▪ Personnel guidelines, policies and procedures	No
	▪ Training courses	No
	▪ Information	No
	▪ General Correspondence	No
Information technology	▪ IT Policies and Procedures	No
	▪ Network diagrams	No
	▪ User Manuals	No
	▪ General Correspondence	No
	▪ System configuration information	No
	▪ Source Code	No
Logistics	• Stock	No
	• Location of warehouses	Yes
	• Details of service providers	No
	• General correspondence	No
Support centre	• Administration (Minute books)	No
	• Contracts	No
	• Leases	No
	• General correspondence	No
	• Intellectual Property	No
	• Litigation	No

7. Certain records can be accessed without the submission of a formal request. These records, where applicable, generally include the following categories: Web site, annual reports, interim reports, records lodged with the Registrar of Companies, the JSE Securities Exchange SA ("JSE") and other regulatory bodies, newspaper announcements and circulars to shareholders. These records, where applicable, can be accessed on the company's web site, referring to newspapers or by approaching the holder of such information (i.e. the secretary and/or the transfer secretaries of the company, the Registrar of Companies and/or the JSE), in each case complying with the requirements laid down for this purpose.
8. Additionally, the company is legally required to ensure that certain categories of records are available for access, without a formal request:
- The Occupational Health and Safety Act No. 85 of 1993;
 - The Constitution of the Republic of South Africa No.3 of 1994
 - The Value-Added Tax Act No. 89 of 1991;
 - Income Tax Act No. 58 of 1962;

- Companies Act No. 61 of 1973;
- Basic Conditions of Employment Act No. 75 of 1997;
- Employment Equity Act No. 55 of 1998;
- Labour Relations Act No. 66 of 1995;
- The Medical Schemes Act No. 131 of 1998;
- The Compensation for Occupational Injuries and Diseases Act No. 130 of 1993;
- The Atmospheric Pollution Prevention Act No. 45 of 1965;
- The Health Act No. 63 of 1977;
- Consumer Affairs (Unfair Business Practices Act), 71 of 1988
- Customs and Excise Amendment Act, 45 of 1995
- South African Revenue Services Act, 34 of 1997

Please note that the identification and inclusion of all pertinent legislation cannot be guaranteed. Any person who is aware of any specific legislation that should be included and which has been omitted, should contact the Company Secretary directly.

9. A request for access to a record that does not fall within the categories identified in Section 7 of this manual must be done formally either via conventional mail, e-mail or fax. This request should be in the prescribed format (hereto attached as Appendix B) as specified in the Act and the Regulations thereto and should be addressed to the Information Officer as identified in Section 4 of this manual. The request fee, prescribed in the Regulations, should be attached.

Please note that a copy of the current fee structure is available at the company's head office. Each request should:

- provide sufficient particulars for the company to identify the requester and the records requested;
- indicate the form of access required;
- specify the postal address or fax number of the requester in the Republic of South Africa; and
- identify the right the requester is seeking to exercise or protect and provide reasons for the request.

The company's Information Officer will respond to any request within 30 days of receiving the request by indicating whether such request for access has been granted or not. Access may be refused under limited circumstances such as:

- Protecting personal information that the company holds about a third person (who is a natural person) from unreasonable disclosure;
- Protecting commercial information that the company holds about a third party (e.g. trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- If disclosure would result in a breach of a duty of confidence owed to a third party;
- If disclosure would jeopardize the safety or life of an individual;
- If disclosure would prejudice or impair the security of property or means of transport;
- If disclosure would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure would prejudice or impair the protection of the safety of the public;
- The record is privileged from production in legal proceedings unless the privilege has been waived;
- If the record is a computer programme;
- Disclosure of the record will put the Company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Company;
- Records containing information about research being carried out or about to be carried out on behalf of a third party or the Company.

10. There are two basic types of fees applicable in terms of the Promotion of Access to Information Act – “request” and “access” fees. The non-refundable request fee (currently R 57.00 inclusive of VAT) is payable on submission of the request for access to a record (unless the request is personal in which event there is no applicable fee) and the access fee is payable prior to the actual gaining of access to the records in the required form. The applicable fees are prescribed in terms of Part III of Annexure A as identified in Government Notice Number 187, Regulation 11.

11. If you request access to a record that contains information about a third party, we are obliged to attempt to contact this third party to inform them of the request and to give them an opportunity to respond by either consenting to the access or by providing reasons why the access should be denied. In the event that the third party furnishes reasons for the support or denial of access, our designated Information Officer will consider these reasons in determining whether access should be granted. You may appeal against a refusal of access by our Information Officer. Please refer to Part 4 of the Promotion of Access to Information Act for further details on the Appeal Process.
12. 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.

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PEPKOR HOLDINGS LTD GROUP OF COMPANIES**APPENDIX "A"**

1. ACKERMANS (BOPHUTHATSWANA) (PTY) LTD
2. ACKERMANS (TRANSKEI) (PTY) LTD
3. ACKERMANS (TRANSVAAL) LTD
4. ACKERMANS LTD
5. ACKERMANS MANAGEMENT SERVICES (PTY) LTD
6. BIG D DISCOUNT HYPER LTD
7. BUSINESS VENTURE INVESTMENTS 1499 (PTY) LTD
8. * CAPFIN (PTY) LTD
9. CASH-HOLD LTD
10. CHAIRCORP (PTY) LTD
11. * DUNNS STORES (PTY) LTD
12. FORMATIX TEN (PTY) LTD
13. * FUTURE CELL (PTY) LTD
14. GARHOLD (PTY) LTD
15. GARLICK DEPARTMENT STORES (PTY) LTD
16. GARLICK HOLDINGS (PTY) LTD
17. GREATERMANS DEPARTMENT STORES LTD
18. H & A PAYNE (1934) LTD
19. I L BACK PROPERTIES SHARE BLOCK COMPANY (PTY) LTD
20. JEMADE FINANCING (PTY) LTD
21. JOFANDER (PTY) LTD
22. JOHN CRAIG GROUP LIMITED
23. *JUST KOR FASHION GROUP (PTY) LTD
24. MANROTRADE FOUR (PTY) LTD
25. * METROTOY (PTY) LTD
26. N JACOBS & COMPANY (PTY) LTD
27. * NEW DUNNS (PTY) LTD
28. ODVEST 155 (PTY) LTD
29. PEP FINANCE (PTY) LTD
30. PEP BELEGGINGS (PTY) LTD
31. PEP LTD
32. PEP VERVAARDIGING (PTY) LTD
33. PEP REEF PROPERTIES (PTY) LTD
34. * PEP RETAIL (PTY) LTD
35. PEP SA LTD
36. PEP STORES PENINSULA HOLDINGS LTD
37. PEPCLO LTD
38. PEPGRO LTD
39. PEPKOR CAPITAL (PTY) LTD
40. PEPKOR CLOTHING INDUSTRIES LTD
41. PEPKOR FINANCE (PTY) LTD
42. PEPKOR FUNDING (PTY) LTD
43. PEPKOR LTD
44. PEPKOR HOLDINGS LTD
45. PEPKOR INVESTMENTS (PTY) LTD
46. * PEPKOR IP (PTY) LTD
47. * PEPKOR IT (PTY) LTD
48. PEPKOR MANUFACTURING LTD
49. PEPKOR RETAIL LTD
50. PEPKOR SA LTD
51. * PEPKORFIN (PTY) LTD
52. * PEPPROP MITCHELL'S PLAIN (PTY) LTD

53. PRINTKOR (PTY) LTD
54. ROTRUSTFIN (PTY) LTD
55. SHOE CITY (PTY) LTD
56. SHOE CITY HOLDINGS (PTY) LTD
57. SWANVEST 85 (PTY) LTD
58. * TENACITY FINANCIAL SERVICES (PTY) LTD
59. TOTS 'n TEENS (PTY) LTD
60. TRADEGRO HOLDINGS LTD
61. TRADEHOLD LTD
62. TULIP INVESTMENTS (PTY) LTD
63. TULIP INVESTMENTS 2 (PTY) LTD
64. ULTIMO HOLDINGS (PTY) LTD
65. * ULTIMO PROPERTIES (PTY) LTD
66. U-SAC (PTY) LTD
67. W M TWEE (PTY) LTD
68. WILFRED MEYERSOHN & CO (PTY) LTD
69. ZAMORI (PTY) LTD

*** ACTIVE**

FORM C

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*

The Head:

B. *Particulars of person requesting access to the record*

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

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone 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 <i>ONLY</i> if a request <i>for information</i> is made on behalf of <i>another</i> person.
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Full names and surname:

Identity number:

D. *Particulars of record*

- | | |
|-----|--|
| (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

- | |
|--|
| <p>(a) A request for access to a record, other <i>than</i> a record containing personal information about yourself, will be processed only after a request fee has been paid.</p> <p>(b) You will be <i>notified of</i> the amount required to be paid as the request fee.</p> <p>(c) The fee payable for access to a record depends <i>on</i> the form <i>in which</i> access is required and the reasonable time <i>required</i> to search for and prepare a record.</p> <p>(d) If you qualify for exemption <i>of</i> the payment <i>of</i> any fee, please state the reason for exemption.</p> |
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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.	
<p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(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.</p> <p>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</p>	

1. If the record is in written or printed form:					
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record		
2. If record consists of visual images this includes photographs, slides, video recordings, computer-generated images, sketches, etc)					
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images"		
<input type="checkbox"/>		<input type="checkbox"/>	transcription of the images*		
3. If record consists of recorded words or information which can be reproduced in sound:					
<input type="checkbox"/>	listen to the soundtrack audio cassette	<input type="checkbox"/>	transcription of soundtrack* written or printed document		
4. If record is held on computer or in an electronic or machine-readable form:					
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record"		
<input type="checkbox"/>		<input type="checkbox"/>	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? Postage is payable.			<table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> </table>	YES	NO
YES	NO				

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 of20

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE