



**MANUAL
OF
PEPKOR HOLDINGS
(PROPRIETARY) LIMITED**

(REGISTRATION NUMBER: 2003/020009/06)

AND ALL ITS SUBSIDIARIES

**Prepared in accordance with Section 51 of the Promotion of Access to Information Act,
No 2 of 2000 ("PAIA")**

Date Compiled: 22 December 2011

Date Revised: 15 December 2016

CONTENTS

1. INTRODUCTION _____	1
2. PEPKOR HOLDINGS (PROPRIETARY) LIMITED _____	1
3. CONTACT DETAILS _____	1
3.1. Information Officer	1
3.2. The South African Human Rights Commission	1
4. ACCESS TO RECORDS HELD BY PEPKOR _____	2
4.1. Records available only on request as per the Act	2
4.2. Records available without a request as per the Act	3
4.3. Records available in terms of any other legislation	3
5. REQUEST FOR INFORMATION PROCEDURES _____	3
5.1. Form of request	3
5.2. Grounds for refusal	3
5.3. Fees	4
6. RECORDS NOT FOUND OR NON-EXISTENT _____	4
APPENDIX A PRESCRIBED FORMS	5
ANNEXURE A PEPKOR HOLDINGS (PROPRIETARY) LIMITED STRUCTURE	9
ANNEXURE B RECORDS KEPT IN TERMS OF APPLICABLE LEGISLATION	11

1. INTRODUCTION

The Promotion of Access to Information Act, 2 of 2000 (“the Act”) was enacted on 3 February 2000, to give effect to the provisions of section 32 of the Constitution, which provides that any person has a right to gain access to information held by a public or private body, when that information is required for the exercise or protection of any rights, 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. In terms of the Act, a private body includes any former or existing juristic person.

2. PEPKOR HOLDINGS (PROPRIETARY) LIMITED

Pepkor Holdings (Proprietary) Limited (hereinafter referred to as the “Pepkor Group” or “Pepkor”) is an investment holding company based in the Republic of South Africa with retail interests in Africa, South East Asia and Europe. The group manages a portfolio of retail chains focused on the value market and selling predominantly clothing, footwear, textiles, cellular and furniture. Its main operating subsidiaries are Pep and Ackermans in South Africa, Best & Less as well as Harris Scarfe in Australia and Pepco in Eastern Europe.

Annexure A provides a list of companies in the Pepkor Group structure.

3. CONTACT DETAILS

3.1 Information Officer

Name: The Company Secretary
Physical Address: 36 Stellenberg Road, Parow Industria, 7493
Postal Address: P O Box 6100, Parow East, 7501

Phone Number: 021 929 4800
Fax Number: 021 929 4785
Email: pepkor@pepkor.co.za
Website: www.pepkor.co.za

3.2 The South African Human Rights Commission

This manual is intended to promote a culture of transparency and accountability by giving effect to the right to information that is required for the exercise or protection of any right. In order to promote effective governance of private bodies, it is necessary for individuals to be able to exercise their rights in terms of the Act in relation to public and private bodies. This manual will enable requestors to obtain the records which they are entitled to in a quick, easy and accessible manner.

However, Section 9 of the Act recognises that the right to access to information cannot be unlimited and should be subject to justifiable limitations:

- aimed at the reasonable protection of privacy;
- relating to commercial confidentiality;
- with regard to effective, efficient and good governance; and
- which balances that right with any other rights, including such rights as contained in the Bill of Rights in the Constitution.

More information and a guide on the Act are available from:

The South African Human Rights Commission (Head Office)

Braampark Forum 3
33 Hoofd Street,
Braamfontein

Phone Number: 011 877 3600
Email: info@sahrc.org.za
Website: www.sahrc.org.za

4. ACCESS TO RECORDS HELD BY PEPKOR

Upon written notice and via use of the prescribed forms, interested parties can make application to view records, within reasonable company hours.

4.1 Records available only on request as per the Act

The list below summarises the subjects/categories of records that Pepkor hold. These records comprise of personnel records, customer-related records, private-body records, other-party records, own records, etc. and include:

- Financial records incl accounting records, asset registers and statements of accounts
- Taxation records
- Product records incl product information (e.g. pricing) and product brochures
- Marketing records
- Operational records incl sales statistics
- Customer-related records
- Employee records
- Personnel guidelines, policies and procedures
- Learning and development records
- Employment Equity information
- IT records incl network diagrams, user manuals, system configurations and source codes
- IT policies and procedures
- Share records
- Statutory records
- Treasury-related records
- Securities and equities
- Pension and provident fund records
- Statutory information
- Legal records incl contracts, leases and intellectual property
- Insurance records
- Environmental/Public safety records
- Business licenses
- Internal correspondence

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.

4.2 Records available without a request as per the Act

Records of a public nature, typically those disclosed on the Pepkor websites and in its various annual reports, may be accessed without the need to submit a formal application.

Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still need to comply with the requirements laid down for this purpose.

4.3 Records available in terms of any other legislation

Where applicable to its operations, Pepkor also retains records and documents in terms of the legislation listed in Annexure B.

Any records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act and the applicable legislation, should interested parties be entitled to such information.

It is recorded that the accessibility of the documents listed herein may be subject to the grounds of refusal set out in this manual.

5. REQUEST FOR INFORMATION PROCEDURES

A request for access to a record that does not fall within the categories identified in section 4.2 of this manual must be done formally either via 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 according to the prescribed fees. The request should be addressed to the Information Officer as identified in section 3.1 of this manual. The request fee, prescribed in the Regulations, should be attached.

5.1 Form of request

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.

5.2 Grounds for refusal

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.

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.

5.3 Fees

There are two basic types of fees applicable in terms of the Act:

Request fee: The non-refundable request fee 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

Access fee: 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.

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

6. 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.

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

- | |
|--|
| <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) 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.</p> <p>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.</p> |
|---|

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 than a record containing personal information about yourself, will be processed only after a request fee has been paid.</p> <p>b) You will be notified of the amount required to be paid as the request fee.</p> <p>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.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.</p> |
|---|

Reason for exemption from payment of fees:

F. Form of access to record

<p>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.</p>
--

<p>Disability:</p>

<p>Form in which record is required:</p>
--

<p>Mark the appropriate box with an X.</p>
--

NOTES:

- | |
|--|
| <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 (Compact Disc)	<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 record*		
<input type="checkbox"/>		<input type="checkbox"/>	Copy in computer readable form* (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 of _____ 20_____

SIGNATURE OF REQUESTER /

PERSON ON WHOSE BEHALF REQUEST IS MADE

PEPKOR HOLDINGS (PTY) LTD AND SUBSIDIARIES	
REGISTERED COMPANY NAME	REGISTERED COMPANY NAME
Active/ Operational Companies	Dormant/Holding Companies
Ackermans (Botswana) (Pty) Ltd	Ackermans (Bophuthatswana) (Pty) Ltd
Ackermans (Lesotho) (Pty) Ltd	Ackermans (Pty) Ltd
Ackermans (Namibia) (Pty) Ltd	Ackermans (Transkei) (Pty) Ltd
Ackermans (Swaziland) (Pty) Ltd	Ackermans (Transvaal) (Pty) Ltd
At the Ready Wholesalers (Pty) Ltd Zimbabwe	Ackermans Management Services (Pty) Ltd
At the Ready Wholesalers (Pty) Ltd Zambia	Auriga B.V.
Capfin (Pty) Ltd	Big D Discount Hyper (Pty) Ltd
Connection Group Holdings (Pty) Ltd	Cash-Hold (Pty) Ltd
Dunns Stores (Botswana) (Pty) Ltd	Formatix Ten (Pty) Ltd
Flash IP (Pty) Ltd	Garhold (Pty) Ltd
Flash Mobile Vending (Pty) Ltd	Garlick Department Stores (Pty) Ltd
Fully Sun China Limited	Garlick Holdings (Pty) Ltd
Global Finest Limited	Greatermans Department Stores (Pty) Ltd
IL Back Properties Aandeelblokkmaatskappy (Pty) Ltd	H & A Payne (1934) (Pty) Ltd
John Craig (Pty) Ltd	Harties Stores Botswana Ltd
John Craig (Botswana) (Pty) Ltd	JD Group International (Pty) Ltd
John Craig (Lesotho) (Pty) Ltd	Jemade Financing (Pty) Ltd
John Craig (Namibia) (Pty) Ltd	Jofander (Pty) Ltd
John Craig (Swaziland) (Pty) Ltd	Mantorade Four (Pty) Ltd
Just Kor Fashion Group (Pty) Ltd	Metrotoy (Pty) Ltd
New Dunns (Pty) Ltd	N Jacobs & Company (Pty) Ltd
Pep Angola Retail Ltd	Odvest 155 (Pty) Ltd
Pep Angola Wholesale Ltd	Pep (Pty) Ltd
Pep Mozambique Lda	Pep Africa Ltd Malawi
Pepkor Speciality Stores (Lesotho) (Pty) Ltd	Pep Beleggings (Pty) Ltd
Pepkor Speciality Stores (Swaziland) (Pty) Ltd	Pep Botswana Holdings Ltd
Pep Stores (Namibia) (Pty) Ltd	Pepkor Africa (Pty) Ltd
Pep Stores (Nigeria) (Pty) Ltd	Pep Holdings (Namibia) Ltd
Pep Stores (Pty) Ltd Lesotho	Pep Ltd Ghana
Pep Stores (Pty) Ltd Swaziland	Pep Properties (Mitchell's Plain) (Pty) Ltd
Pep Stores (Pty) Ltd Zimbabwe	Pep Reef Properties (Pty) Ltd
Pep Stores Zambia Ltd	Pep Retail (Pty) Ltd
Pepkor GPS (Shanghai) Co Ltd	Pep SA (Pty) Ltd
Pepkor IP (Pty) Ltd	Pep Stores Peninsula Holdings (Pty) Ltd
Pepkor Speciality Stores (Namibia) (Pty) Ltd	Pep Stores Retail (Pty) Ltd Namibia
Pepkor Speciality Stores (Pty) Ltd	Pep Vervaardiging (Pty) Ltd
Pepkor Trading (Pty) Ltd	Pepclo (Pty) Ltd
Pepkorfin (Pty) Ltd	Pepkor (Pty) Ltd
Profurn Limited	Pepkor Clothing Industries (Pty) Ltd
Retail Holdings S.a.r.l.	Pepkor Finance (Pty) Ltd
Shoe City (Pty) Ltd	Pepkor Investments (Pty) Ltd
Southern View Finance SA (Pty) Ltd t/a Capfin	Pepkor IT (Pty) Ltd
Van As and Associates Recoveries (Pty) Ltd	Pepkor Manufacturing (Pty) Ltd
	Pepkor Retail (Pty) Ltd
	Pepkor SA (Pty) Ltd
	Printkor (Pty) Ltd
	Rotrustfin (Pty) Ltd
	Shoe City Holdings (Pty) Ltd
	Sim Dynamix (Pty) Ltd
	Sim Dynamix IP (Pty) Ltd
	Swanvest 85 (Pty) Ltd
	Tango Hosiery (Pty) Ltd
	Tenacity Financial Services (Pty) Ltd
	Tots 'N Teens (Pty) Ltd

PEPKOR HOLDINGS (PTY) LTD AND SUBSIDIARIES	
REGISTERED COMPANY NAME	REGISTERED COMPANY NAME
Active/ Operational Companies	Dormant/Holding Companies
	Translink Services S.a.r.l. Tendril S.a.r.l. Tulip Investments (Pty) Ltd Tulip Investments 2 (Pty) Ltd Ultimo Holdings (Pty) Ltd Ultimo Properties (Pty) Ltd Universal Insurances PPC Limited W M Twee (Pty) Ltd Wilfred Meyersohn & Company (Pty) Ltd Zamori (Pty) Ltd

Applicable legislation as per section 51(1)(d) of the Act:

A

- Administrative Adjudication of Road Traffic Offences Act, No.46 of 1998
- Advertising on Roads and Ribbon Development Act, No.21 of 1940
- Alienation of Land Act, No.68 of 1981
- Arbitration Act, No.42 of 1965
- Atmospheric Pollution Prevention Act, No.45 of 1965

B

- Bills of Exchange Act, No.34 of 1964
- Broadcasting Act, No.4 of 1999
- Basic Conditions of Employment Act, No.75 of 1997 (*as amended*)
- Broad-Based Black Economic Empowerment Act, No.53 of 2003
- Businesses Act, No.71 of 1991

C

- Companies Act, No.71 of 2008
- Compensation for Occupational Injuries and Diseases Act, No.130 of 1993
- Competition Act, No.89 of 1998
- Constitution of the Republic of South Africa, No.108 of 1996
- Consumer Protection Act, No.68 of 2008
- Copyright Act, No.98 of 1978
- Counterfeit Goods Act, No.37 of 1997
- Customs and Excise Act, No.91 of 1964 (*as amended*)
- Currency and Exchanges Act, No.9 of 1933

D

- Debt Collectors Act, No. 114 of 1998
- Designs Act, No.195 of 1993

E

- Electronic Communications and Transactions Act, No.25 of 2002
- Electronic Communications Act, No.36 of 2005 (*as amended*)
- Employment Equity Act, No.55 of 1998 (*as amended*)

F

- Financial Advisory and Intermediary Services Act, No.37 of 2002 (*as amended*)
- Financial Intelligence Centre Act, No.38 of 2001
- Foodstuffs, Cosmetics and Disinfectants Act, No.54 of 1972

H

- Health Professions Act, No.56 of 1974

I

- Identification Act, No.68 of 1997
- Income Tax Act, No.58 of 1962 (*as amended*)
- Insolvency Act, No.24 of 1936

L

- Labour Relations Act, No.66 of 1995 (*as amended*)
- Leases of Land Act, No.18 of 1969

M

- Medical Schemes Act, No.131 of 1998
- Merchandise Marks Act, No.17 of 1941

N

- National Health Act, No.61 of 2003
- National Credit Act, No.34 of 2005 (*as amended*)
- National Road Traffic Act, No.93 of 1996
- National Payment System Act, No.78 of 1998

O

- Occupational Health and Safety Act, No.85 of 1993

P

- Patents Act, No.57 of 1978
- Pension Funds Act, No.24 of 1956
- Prescription Act, No.68 of 1969
- Prevention of Organised Crime Act, No.121 of 1998
- Prevention and Combating of Corrupt Activities Act, No.12 of 2004
- Protection of Personal Information Act, No.4 of 2013
- Postal Services Act, No.124 of 1998
- Promotion of Access to Information Act, No.2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act, No.4 of 2000 (*as amended*)
- Protected Disclosures Act, No.26 of 2000

R

- Regulation of Interception of Communications and Provision of Communication-related Information Act, No.70 of 2002 (*as amended*)
- Road Transportation Act, No.74 of 1977

S

- Skills Development Act, No.97 of 1998
- Skills Development Levies Act, No.9 of 1999
- South African Revenue Services Act, No.34 of 1997

T

- Tax Administration Act, No.28 of 2011 (*as amended*)
- Tax Administration Laws Amendment Act, No.44 of 2014
- Trade Marks Act, No.194 of 1993

U

- Unemployment Insurance Contributions Act, No.4 of 2002
- Unemployment Insurance Act, No.63 of 2001

V

- Value-Added Tax Act, No.89 of 1991 (*as amended*)