Registration No. 2007/009189/07
Stockdale Street (Pty) Ltd is an authorized financial services provider – FSP No 44573

Promotion of Access to Information Manual
Private Body

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A. INTRODUCTION

Stockdale Street is a registered financial services provider. The Company was established in 2003 and advises on Private Equity investments in a broad range of business in various industries.

The purpose of this Manual is to assist persons wishing to access information in terms of the Promotion of Access to Information Act, no 2 of 2000 **("the Act"),** promulgated in March 2001 from Stockdale Street (Pty) Ltd.

This manual is not exhaustive, nor does it comprehensively deal with every procedure provided for in the Act. Requesters are therefore advised to familiarize themselves with the provisions of the Act.

B. COMPANY CONTACT DETAILS

Business address:

13 Baker Street
Rosebank
2196

Postal Address:

Suite 164
Private Bag X31
Saxonwold
2132

Contact Person:

Sajeet Giga email: website@stockdalestreet.co

Information officer:

James Andrew Teeger (Director) is the appointed Information Officer for the purposes of this manual.

SECTION C

GUIDE ON HOW TO USE THE ACT (SECTION 10)

1. The Regulator has, in terms of section 10(1) of the Promotion of Access to Information Act 2 of 2000 ('POPIA') as amended by the Protection of Personal Information Act 4 of 2013 ('PAIA'), as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

2. The contact details of the Information Regulator are as follows:

   Information Regulator
   The Research and Documentation Department
   Postal Address: P.O. Box 31533, Braamfontein, Gauteng, 2017
   Telephone: +27 10 023 5200
   Website: justice.gov.za

   E-mail (complaints): complaints.IR@justice.gov.za
   E-mail (general enquiries): inforeg@justice.gov.za

3. The Guide is available in each of the official languages and in braille.

4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

5. The Guide can also be obtained:

   - Upon request to the Information Officer, or
   - From the website of the Regulator (https://www.justice.gov.za/inforeg/).

6 . Section 51(1) (c)[1] provision requires a private body to compile and make available a manual

7. Records that may be available in terms of any other legislation Section 51(1)(d)[2], unless disclosure is likely to cause harm to the commercial or financial interest of the company. (Please note that this is not an exhaustive list):

   - Basic Conditions of Employment Act 75 of 1997
   - Companies Act 61 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 61 of 1978
   - Currency and Exchange Act 9 of 1933
   - Electronic Communications and Transactions Act 25 of 2002
   - Employment Equity Act 55 of 1998
   - Financial Advisory and Intermediary Services Act 37 of 2002
   - Financial Intelligence Centre Act 38 of 2001
   - Financial Markets Act 19 of 2012
   - Income Tax Act 58 of 1962
   - Intellectual Property Laws Amendments Act 38 of 1997
   - Labour Relations Act 66 of 1995
   - Occupational Health and Safety Act 85 of 1993
   - Prevention and Combating of Corrupt Activities Act 12 of 2004
   - Protected Disclosures Act 26 of 2000
   - Protection of Investment Act 22 of 2015
   - Protection of Personal Information Act 4 of 2013
   - Securities Transfer Tax Act 25 of 2007
   - Skills Development Act 97 of 1998
   - Skills Development Levies Act 9 of 1999
   - Tax Administration Act 28 of 2011
   - Unemployment Insurance Contributions Act 4 of 2002
   - Value Added Tax Act 89 of 1991

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[1] *Section 51(1)(c) of PAIA- The head of a private body must make available a manual containing the description of the information listed in above.*

[2] *Section 51(1)(d) of PAIA- a description of the records of the body which are available in accordance with any other legislation.*

SECTION D

COMPANY INFORMATION SECTION 51(1)(E)

a) The granting of access to certain records in respect of categories listed below may be made available in terms of other Legislation.

b) The granting of access to certain records requested by a requester does not automatically entitle that requester access thereto as certain grounds for refusal are available as set out in the Act.

1. Incorporation documents

1.1 Memorandum of Incorporation

2. Constitution of company

2.1 Company statutory register
2.2 Register of directors, officers and auditors
2.3 Share register
2.4 Minute of Meetings
2.5 Agreements

3. Finance and taxation

3.1 Operational information
3.2 Accounting records
3.3 Annual Financial Statements
3.4 Bank Statements
3.5 Asset Register
3.6 Invoices/Credit notes
3.7 Income Tax
3.8 Value Added Tax ("VAT")

4. Investment

4.1 General
4.2 Agreements
4.3 Trading Records
4.4 Investment management advise

5. Human Resources

5.1 Employment Contracts
5.2 Salary records
5.3 Leave records
5.4 Training records
5.5 Operational information

6. Regulatory

6.1 Licenses
6.2 Policies and Manuals

7 Insurance

7.1 General
7.2 Administrative Information

8 Categories of records which are available without a person having to request access

Category of records	Types of the Record	Available upon request
Complaint Policy	Policy Document	X
FSCA License	License	X
Conflict of Interest	Policy Document	X
Complaints management framework	Policy Document	X
Privacy Policy	Policy Document	X
FICA Risk Management and Compliance Programme	Policy Document	X

SECTION E

ACCESS TO INFORMATION OF PRIVATE BODY

1. The manual will be available on the website www.stockdalestreet.co.za and at the company's address as stated in section B of this document.

2. Request for Access of Information to a record as contemplated in section 53(1)[3] of the Act must substantially correspond with Form 2, **Annexure A** of the Regulations as published in the Government Gazette, attached. If a request for access to a record is granted or refused, the information officer must inform the requester of the outcome on a form that corresponds with Form 3 of **Annexure A**, attached.

3. The requester must provide sufficient details 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. The requester should also indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

4. The requester must identify the right that is sought to be exercised or to be protected and provide explanation of why the record is being requested.

5. Request on behalf of a 3rd party by a requester, must provide proof of capacity in which request is made.

6. The fee for private bodies is R140. The requester may lodge an internal appeal or an application to the court against the tender or payment of the requested fee.

7. If the request is granted then a further access fee must be paid for the reproduction and the search and preparation, and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

8. Fees

8.1 Fees for reproductions in terms of section 52(3)[4] of the Act are prescribed in **Annexure B** of the Regulations as published in the Government Gazette, attached.

8.2 The request fee payable by a requester, other than a personal requester, referred to in section 54(1)[5] of the Act is prescribed in **Annexure B** of the Regulations as published in the Government Gazette, attached.

8.3 The access fee payable by a requester referred to in section 54(7)[6], unless exempted under section 54(8)[7], of the Act are prescribed in **Annexure B** of the Regulations as published in the Government Gazette, attached.

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[3] Section 53(1) of PAIA- A request for access to a record of a private body must be made in the prescribed form to the private body concerned at its address, fax number or electronic mail address.
[4] Section 52(3) of PAIA-. The only fee payable (if any) for access to a record described in a list so published is a prescribed fee for reproduction.
[5] Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any), before further processing the request.
[6] Section 54(7) of PAIA- Access fees prescribed for the purposes of subsection (6) must provide for a reasonable access fee.
[7] Section 54(8) of PAIA- The Minister may, by notice in the Gazette—
(a) exempt any person or category of persons from paying any fee referred to in this section;
(b) determine that any fee referred to in this section is not to exceed a certain maximum amount;
(c) determine the manner in which any fee referred to in this section is to be calculated;
(d) determine that any fee referred to in this section does not apply to a category of records;
(e) exempt any person or record or category of persons or records for a stipulated 20 period from any fee referred to in subsection (6); and
(f) determine that where the cost of collecting any fee referred to in this section exceeds the amount charged, such fee does not apply.

SECTION F

GOVERNANCE

At Stockdale Street (Pty) Ltd accountability and ultimate responsibility for compliance with relevant legislation rests with the directors of Stockdale Street (Pty) Ltd.

The directors hereby approve this version of the PAIA Manual by signing in the table below.

Capacity	Name	Date	Signature
Chairman of the Board			
Key Individual			

ANNEXURE A

FORM 2

REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

_____
_____
_____
_____

(Address)

E-mail address: _____

Fax number: _____

*Mark with an **"X"***

☐ Request is made in my own name ☐ Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made *(when made on behalf of another person)*				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				
Postal Address				

Street Address				
E-mail Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED

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. (*If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD

*(Mark the applicable box with an "**X**")*

Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)*	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	

Copy of record on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *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	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	**Facsimile**	**Electronic communication** *(Please specify)*

Signed at _____ this _____ day of _____ 20

_____

_____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

_____

Signature of Information Officer

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

1. *If your request is granted the—*

   (a) amount of the deposit, (if any), is payable before your request is processed; and
   (b) requested record/portion of the record will only be released once proof of full payment is received.

2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____
_____
_____
_____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	

OR

2. You requested:

Printed copies of the information *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of information on flash drive *(including virtual images and soundtracks)*	
Copy of information on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language: *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60. 00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ Yes ☐ No

Hours of search		Amount of deposit *(calculated on one third of total amount per request)*	

The amount must be paid into the following Bank account:

Name of Bank: _____
Name of account holder: _____
Type of account: _____
Account number: _____
Branch Code: _____
Reference Nr: _____
Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

_____

Information officer

ANNEXURE B

Fees

FEES IN RESPECT OF PRIVATE BODIES

	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by requestor) (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (i) Flash drive (to be provided by requestor) (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.".