

BASIL READ HOLDINGS LIMITED

(Registration Number 1984/007758/06)

Manual in terms of Section 51 of

The Promotion of Access to Information Act 2/2000

(the "ACT")

Compiled in April 2016

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Manual prepared in terms of Section 51 of the Promotion of Access to Information Act, no 2 of 2000 (“the Act”).

1. Introduction

1.1 Basil Read Group

Basil Read Holdings Limited is a public company listed under the heavy construction in the industrial sector of the JSE (Johannesburg Stock exchange). The Company operates through many subsidiaries grouped in four operational divisions i.e. construction, mining, engineering and developments. Basil Read operates in South Africa, Mozambique, Botswana, Namibia, St Helena Island and other African countries.

1.2 Constitutional requirement

This manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000 – “the Act”). The Act gives effect to the provisions of Section 32 of the Constitution of South Africa, which provides that “everyone has the right of access to any information held by another person and that is required for the exercise and/or protection of any right”. Where a request is made in terms of the Act, the private body to which the request is made is obliged to release the information, except where the Act expressly provides that the information may or must be withheld.

1.3 Limitations

It should be noted that the right to access to information may be limited in terms of the Act on bases that include protection of privacy, commercial confidentiality, good governance and for purposes of balancing the right to access to information with other rights contained in the Bill of Rights in the Constitution. A request for access to the company record must or may therefore be refused in terms of Chapter 4 of Part 3 of the Act.

2. List of Companies

This manual is prepared and published on behalf of the following companies in the Basil Read group of companies:

- Basil Read Holdings Limited
- Basil Read Limited
- Basil Read Roads (Pty) Ltd
- Basil Read Mining (Pty) Ltd
- Basil Read Mining Namibia (Pty) Ltd
- Basil Read Mining Botswana (Pty) Ltd
- Basil Read Mozambique Limitada
- Basil Read Zambia Limited
- Basil Read Mauritius (Pty) Ltd

- Blasting & Excavating (Pty) Ltd
- Blasting & Excavating Namibia (Pty) Ltd
- City Square Trading 949 (Pty) Ltd
- CODEVCO (Pty) Ltd
- Mvela Phanda Construction (Pty) Ltd
- N17 Toll Operators (Pty) Ltd
- Newport Construction (Pty) Ltd
- Phambili Pipelines (Pty) Ltd
- Roadcrete-Mkhatjwa (Pty) Ltd
- Roadcrete Africa (Pty) Ltd
- Savanna City Developments (Pty) Ltd
- Sladden International Botswana (Pty) Ltd
- Sunset Bay Trading (Pty) Ltd
- Valente Brothers (Pty) Ltd

3. Contact details

All requests for information in terms of this manual should be addressed to:

Ms. Andiswa Ndoni

Private Bag X170,
Bedfordview
2008

OR

Basil Read Campus

7 Romeo Street
Hughes Extension
Boksburg
1459

Phone no 011 418 6300

Fax no 011 418 6418

e-mail address: Companysecretariat@basilread.co.za

4. The Guide in terms of Section 51(1) (b)

The Human Rights Commission has compiled a guide containing information on how to exercise any right contemplated in the Act. The guide is available from:

The South African Human Rights Commission
PAIA Unit
The Research & Documentation Department
Private Bag 2700
HOUGHTON
2041
Telephone 011/484-8300
Fax no 011/484-5761
e-mail address: PAIA@sahrc.org.za

5. Applicable legislation

Records are kept in terms of the following legislation:

- The Companies Act, 71 of 2008
- The Income Tax Act, 58 of 1962
- The Value-added Tax Act, 89 of 1991
- The Stock Exchanges Control Act, 1 of 1985
- The Occupational Health & Safety Act, 85 of 1993
- The Employment Equity Act, 55 of 1998
- The Labour Relations Act, 66 of 1995
- The Basic Conditions of Employment Act, 75 of 1997
- The Unemployment Insurance Act, 63 of 2001
- The Skills Development Levies Act, 9 of 1999
- The Compensation for Occupational Injuries & Diseases Act, 130 of 1993
- The Customs & Exercise Act, 91 of 1964
- The Promotion of Access to Information Act, No. 2 of 2000

6. Categories of information available without request in terms of section 51(1)(c)

No notice in terms of Section 52(2) of the Act, regarding the categories of records of Basil Read Group which are available without request has been published.

There is however information regarding the Basil Read group that is available without request on the www.basilread.co.za website. This information changes from time to time and the company provide this information not for purposes of complying with the requirements of this Act.

7. Records kept

Details of the subjects on which records are held and the categories of records held on each subject are the following:

7.1 Company Secretarial

- a) Company documents including the Memorandum of Incorporation
- b) Shareholders registers
- c) Minute books
- d) Statutory returns
- e) Share certificates

7.2 Agreements

Agreements with customers, suppliers, service providers and other parties

7.2.1 Moveable and immovable property

- a) Title deeds
- b) Lease agreements
- c) Hire agreements
- d) Hire-purchase agreements
- e) Credit sale agreements
- f) Ordinary and conditional sale agreements
- g) Policies and procedures

7.2.2 Intellectual property

- a) Trade marks
- b) Patents
- c) Designs
- d) Know-how
- e) Licensing agreements

7.2.3 Insurance

- a) Policies
- b) Insurance claim files

7.2.4 Taxation

- a) Income tax files
- b) Income tax returns

7.2.5 Human Resources

- a) Policies and procedures
- b) Employee information
- c) Personnel files
- d) Disciplinary records
- e) Employee training records
- f) Grievance procedures
- g) IRP5s
- h) Labour disputes records
- i) Leave records
- j) Employment agreements
- k) Forms and applications
- l) Payroll reports and wage register
- m) Payslips
- n) Workplace and Union agreements and records
- o) Pension fund and retirement benefit funds rules and records
- p) Medical Aid records

7.2.6 Finance and accounting

- a) Accounting records
- b) Financial statements
- c) Management accounts
- d) Reports and returns
- e) Banking details and bank statements

- f) Debtors/creditors statements and invoices
- g) Annual financial statements
- h) Payment records
- i) Policies and procedures
- j) Asset registers
- k)

7.2.7 Operations

- l) Permits
- m) Licenses
- n) Consents
- o) Approvals
- p) Authorizations
- q) Applications
- r) Registrations
- s) Policies and procedures
- t) Reports and supporting documentation
- u) Contractor, client and supplier agreements and information
- v) Health Safety and Environmental procedures, manuals, reports and other documents
- w)

7.2.8 Information technology

- a) System documentation and manuals
- b) Project, disaster recovery and implementation plans
- c) Policies and procedures
- d) intranet

7.2.9 Administration

- a) Audit reports
- b) Risk Management reports
- c) Quality guidelines and reports

- d) Correspondence with internal and external parties
- e) Litigation register

8. Form of request

A person who wishes to access the records of any of the identified entities must complete the necessary requisition form.

If a person needs assistance to obtain the form or on any other matter, please contact Ms. A Ndoni at the contact details provided in clause 3. The completed request form must be sent to the addresses or fax number provided in clause 3 and marked for the attention of Ms. A Ndoni.

All the pertinent sections must be completed fully in order to avoid delay in processing the request.

Ms. A Ndoni will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. The fee structure applicable to private bodies can be accessed at www.sahc.org.za or doj.gov.za under "Regulations.

NOTE: Access to certain records may be denied on the grounds set out in the Act.

9. Copies and inspection of the manual

Manuals are available for inspection, free of charge, at the offices of Basil Read Holdings Limited; copies are also available from the South African Human Rights Commission; from the Government Printer and on our website (www.basilread.co.za).

Requisition Form

A. PARTICULARS OF PRIVATE BODY (specify the company)

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: _____

Telephone number: _____ Fax number: _____

E-mail address: _____

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

C. PARTICULARS OF PERSON ON WHOSE BEHALF THE REQUEST IS MADE

This section must be completed ONLY if a request for information is made on behalf of another person. 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 (*if more space is needed attach a separate page and sign it*)

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

2. Reference number, if available and known to requester:

3. Any further particulars of the record requested

E. FEES:

(a) A request for access to a record, other than record containing personal information about the requester, 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 within 5 days of receiving your request.

(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 therefore.

Reason for exemption of payment for the fee:

F. FORM OF ACCESS TO THE 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 _____

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 to the record, if any, will be determined partly by the form in which access is requested.

Mark the appropriate box with an "X"

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 (audio cassette)

Transcription of soundtrack* (written or printed document)

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 the record*

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?

YES

NO

Postage is payable.

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 _____ on _____ of _____ year _____

Signature of requester/Person on whose behalf request is made