

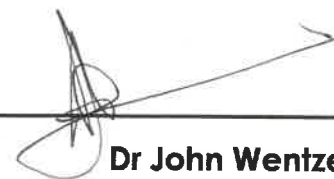
ADCORP HOLDINGS LIMITED

(Registration Number: 1974/001804/06)
("Adcorp" or the "Company")

INFORMATION MANUAL

PREPARED IN TERMS OF THE REQUIREMENTS OF:

**SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION
ACT, NO 2 OF 2000 ("PAIA") AND UPDATED IN THE LIGHT OF THE
PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013
("POPIA")**


Dr John Wentzel
Chief Executive Officer
Adcorp Holdings Limited

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PURPOSE

This Manual is compiled as a statutory requirement in compliance with the provisions of PAIA, which gives effect to the Constitutional right of access to any information held by the Government, and any information held by private bodies that is required for the exercise and protection of any rights.

Where a request is made in terms of PAIA, the body to which the request is made is obliged to give access to the requested information, except where the Act expressly provides that the information may or must not be released.

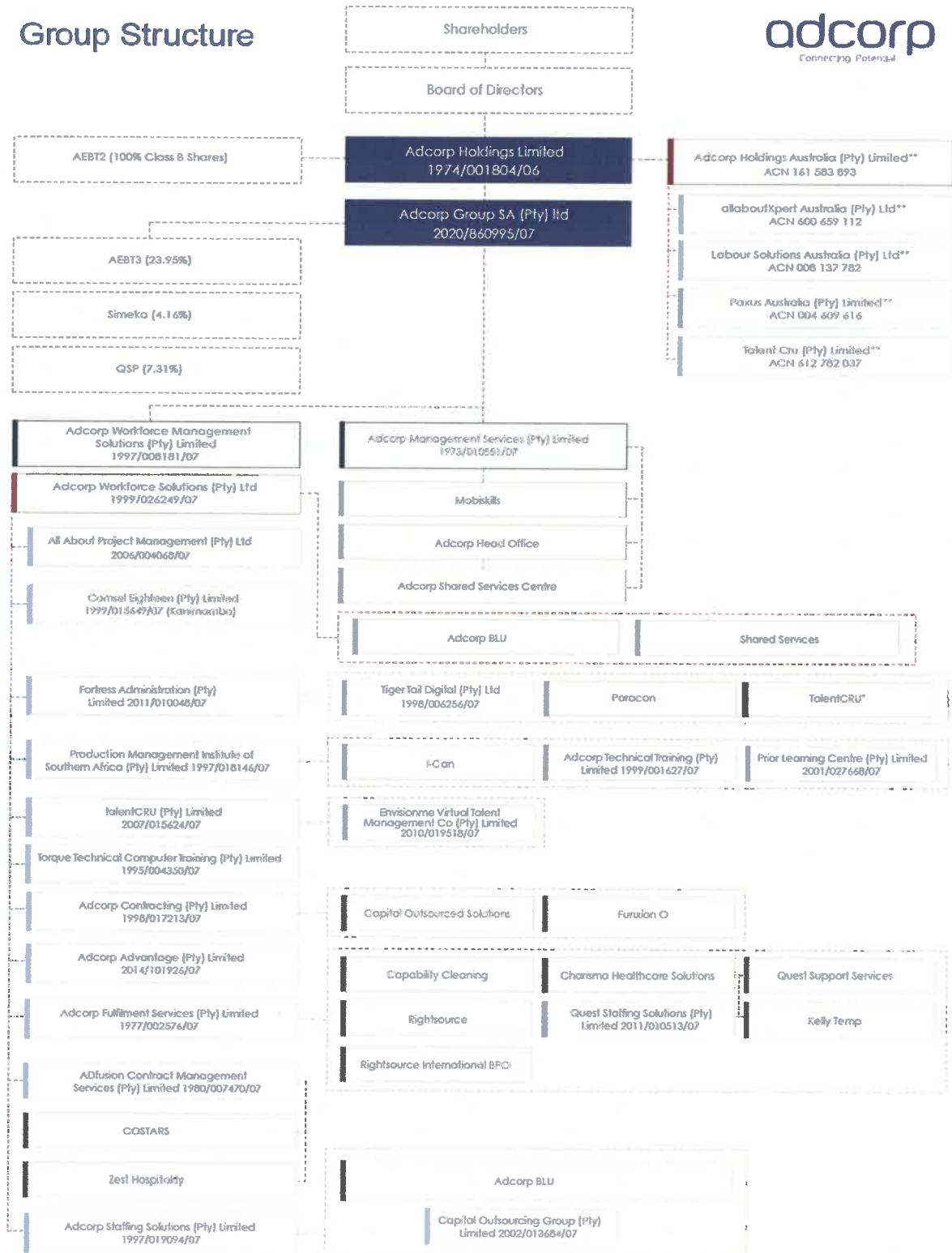
POPIA was enacted in November 2013, to promote the protection of personal information processed by public and private bodies. POPIA amended certain provisions of PAIA, balancing the need for access to information, against the need to ensure the protection of personal information.

GROUP STRUCTURE

Adcorp's strategy is underpinned by its aspiration to manage workforce solutions and careers that deliver optimal value for all of its stakeholders.

The constituent brands carry on business in the realms of talent acquisition, contingent staffing, business process outsourcing and learning and development within multiple geographies. Kindly refer to the Adcorp Group Structure hereunder.

Group Structure



LEGEND

Unless otherwise indicated all entities are registered in South Africa

- * talentCRU comprises of previous divisions (DAV Professional Placement Group, Kelly Perm and The Personnel Concept)
- ** Registered in Australia
- Intermediate holding company
- Subsidiary
- Subsidiary of a subsidiary
- Division

PROCESSING DETAILS IN TERMS OF POPIA

In terms of POPIA, data must be processed for a specified purpose. The purpose for which data is processed by Adcorp will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

1. Categories of Data Subjects

Adcorp holds information and records on various categories of data subjects. The list includes, but is not limited to:

- Employees / Personnel of Adcorp;
- Adcorp Clients;
- Any third party with whom Adcorp conducts its business services;
- Adcorp Contractors and Candidates;
- Officials trained by Adcorp;
- Suppliers of Adcorp;
- Service Providers of Adcorp.

PARTICULARS IN TERMS OF SECTION 51, PAIA

1. Contact Details [Section 51(1)(a)]

1.1 **Information Officer**

The responsibility for administration of, and compliance with, PAIA and POPIA have been delegated to the Information Officer. Requests pursuant to the provisions of PAIA and/or POPIA should be directed to the Information Officer as follows:

Information Officer: Lisa Laporte
Street Address: Adcorp Place
102 Western Service Road
Gallo Manor Ext 6, 2191
Postal Address: PO Box 70635
Bryanston
2021
Telephone: +27 10 800 0000
Email Address: compliance@adcorpgroup.com
Website: www.adcorp.co.za

2. Information Regulator's Guide [Section 51 (1)(b)]

- 2.1 This Guide is available 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 11 484-1360

Website: www.sahrc.org.za

E-mail: PAIA@sahrc.org.za

3. Records Available in terms of other Legislation [Section 51(1)(d)]

NO.	ACT
1	Basic Conditions of Employment Act, 1997 (Act No. 75 Of 1997)
2	Broad-Based Black Economic Empowerment Act, 2003 (Act No. 53 Of 2003)
3	Companies Act 2008 (Act No. 71 Of 2008)
4	Electronic Communications and Transactions Act, 2002 (Act No. 25 Of 2002)
5	Employment Equity Act, 1998 (Act No. 55 Of 1998)
6	Income Tax Act, 1962 (Act No. 58 Of 1962)
7	King Code of Governance for South Africa, 2009 (King IV)
8	Labour Relations Act, 1995 (Act No. 66 Of 1995)
9	Regulation of Interception of Communications and Provision of Communication-Related Information Act, 2002 (Act No. 70 Of 2002)
10	Skills Development Act, 1998 (Act No. 97 Of 1988)
11	Skills Development Levies Act, 1999 (Act No. 9 Of 1999)
12	Value-Added Tax Act, 1991 (Act No. 89 Of 1991)
13	International Financial Reporting Standards
14	Compensation for Occupational Injuries and Diseases Act, 1993 (Act No. 130 Of 1993)
15	Competition Act 1998 (Act No. 89 Of 1998)

NO.	ACT
16	Copyright Act 98 Of 1978
17	Currency and Exchange Act, 1933 (Act No 9 Of 1933)
18	Financial Advisory and Intermediary Services Act, 2002 (Act No 37 Of 2002)
19	General and Further Education and Training Quality Assurance Act, 2001 (Act No. 58 Of 2001)
20	Protected Disclosure Act, 2000 (Act No. 26 Of 2000)
21	Promotion of Access to Information Act, 2000 (Act No. 2 Of 2000)
22	Occupational Health and Safety Act, 1993
23	Immigration Act, 2002 (Act No. 13 Of 2002)
24	National Credit Act, 2005 (Act No. 34 Of 2005)
25	Unemployment Insurance Act, 2001 (Act No. 63 Of 2001)
26	Unemployment Insurance Contributions Act, 2002 (Act No. 4 Of 2002)
27	Prevention and Combating of Corrupt Activities Act, 2004 (Act No. 12 Of 2004)
28	Prevention of Organised Crime Act 121 Of 1998 (POCA)
29	Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act No. 4 Of 2000)
30	National Water Act, 1998 (Act No. 36 Of 1998)
31	National Road Traffic Act, 1996 (Act No 93 Of 1996)
32	Arbitration Act, 42 Of 1965
33	Constitution of The Republic of South Africa Act 108 Of 1996
34	Consumer Protection Act 68 Of 2008 (CPA)
35	Protection of Personal Information Act 4 of 2013 (POPIA)

4. Access to Records held by Adcorp Holdings Limited [Section 51(1)(c) & (e)]

4.1. Automatic Disclosures, i.e. Information that is freely available [Section 51(1)(c)]

- Adcorp Holdings Limited Integrated Annual Report
- Trading Statements
- Website Information – www.adcorp.co.za

4.2. Information that may be Requested [Section 51(1)(e)]

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:

4.2.1 HUMAN RESOURCES

- Policies on staff recruitment and other staff-related Policies
- Employment Contracts
- Details of employees and benefits

4.2.2 PROCUREMENT

- Procurement Policies

4.2.3 COMPANY SECRETARIAL

- Company Registrations
- Company Documentation relating to Directors' appointments
- Statutory Documentation
- Company Share Registers
- Minutes and Resolutions

4.2.4 FINANCIAL

- Financial Statements
- Tax Records

4.2.5 GOVERNANCE, RISK AND COMPLIANCE

- B-BBEE Certificates

4.3 *The Request Procedures*

- A Requestor must use the prescribed form to make the request for access to information. The request must be made to the Adcorp Information Officer. This request must be made to the address or electronic mail address as per Section 53(1) (a).
- The Requestor must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requestor. The Requestor should also indicate which form of access is required. The Requestor should also indicate if any other manner is to be used to inform the Requestor and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].
- The Requestor must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2) (d)].

- If a request is made on behalf of another person, the Requestor must then submit proof of the capacity in which the Requestor is making the request to the satisfaction of the head of the private body [s 53(2) (f)].

4.4 Fees

A Requestor who seeks access to a record containing personal information about that Requestor is not required to pay the Request Fee. Every other Requestor, who is not a personal Requestor, must pay the required Request Fee:

- The Information Officer must notify the Requestor (other than a personal Requestor) by notice, requiring the Requestor to pay the prescribed fee (if any) before further processing the request [s 54(1)].
- The fee that the Requestor must pay to a private body is R50. The Requestor may lodge an application to the court against the tender or payment of the request fee [s 54(3) (b)].
- After the Information Officer has made a decision on the request, the Requestor must be notified on the required form.
- If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].

5. Other information as may be Prescribed [Section 51(1)(f)]

The Minister of Justice and Constitutional Development has not made any Regulations in this regard.

6. Availability of the Manual [Section 51(3)]

This Manual is available for inspection at Adcorp Place, 102 Western Service Road, Gallo Manor, Woodmead, and copies are available on our website (www.adcorp.co.za), or alternative copies are available at the SAHRC and / or The Information Regulator, as the case may be. In respect of hard copies, any transmission costs/postage will be for the account of the Requestor.

7. Fees in respect of Private Bodies

- 7.1 The fee for a copy of the Manual as contemplated in regulation 9(2) (c) is R1.10 for every photocopy of an A4-size page or part thereof.
- 7.2 The fees for reproduction referred to in Regulation 11(1) are as follows:

		Rands
(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c)	For a copy in a computer-readable form on a flash drive	70,00
(d)	▪ For a transcription of visual images for an A4 size page or part thereof	40,00
	▪ For a copy of visual images	60,00
(e)	▪ For a transcription of an audio record for an A4 size page or part thereof	20,00
	▪ For a copy of an audio record	30,00

7.3 The Request Fee payable by a Requestor, other than a personal Requestor, referred to in Regulation 11(2) is R50,00.

7.4 The access fees payable by a Requestor referred to in Regulation 11(3) are as follows:

		Rands
7.4(a)	For every photocopy of an A4-size page or part thereof	1,10
7.4(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
7.4(c)	For a copy in a computer-readable form on a flash drive	70,00
7.4(d)	▪ For a transcription of visual images for an A4 size page or part thereof	40,00
	▪ For a copy of visual images	60,00
7.4(e)	▪ For a transcription of an audio record for an A4 size page or part thereof	20,00
	▪ For a copy of an audio record	30,00
7.4(f)	To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	

7.4.1 For purposes of section 54(2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable; and
- (b) One third of the access fee is payable as a deposit by the Requestor.

7.4.2 The actual postage is payable when a copy of a record must be posted to a Requestor.

ANNEXURE A – PRESCRIBED FORMS

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

Information Officer: Lisa Laporte
Street Address: Adcorp Place
102 Western Service Road
Gallo Manor Ext 6, 2191
Telephone: +27 10 800 0000
Email Address: compliance@adcorpgroup.com

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 email address 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 name and surname: _____

Identity number: _____

Postal address: _____

Mobile 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 ONLY if a request for information is made on behalf of another person.

Full name 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 page and attach it to this form. **The Requestor must sign all the additional pages.**

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

2. Reference number, if available: _____

3. Any further particulars of record: _____

E. Fees

- (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.
(b) You will be notified of the amount required to be paid as the request fee.
(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 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: _____

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.

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* (flash drive)		
*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 page and attach it to this form. **The Requestor must sign all the additional pages.***

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 REQUESTOR / PERSON
ON WHO'S BEHALF REQUEST IS MADE