

**TORLEDO (PTY) LTD
(Reg. No. 1980/009196/07)**

PAIA MANUAL

**Prepared in terms of section 51 of the Promotion of Access to Information Act 2
of 2000 (as amended)**

DATE OF REVISION: 01/10/2023

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|---------------------|---|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO” | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA”
as | Promotion of Access to Information Act No. 2 of 2000(
Amended; |
| 1.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | “Regulator” | Information Regulator; and |
| 1.8 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF TORLEDO (PTY) LTD

3.1. Chief Information Officer

Name: Evert Potgieter
Tel: 012 667 5468
Email: evert.potgieter@astralfoods.com

3.2. Deputy Information Officers

Feed Division

Name: Reinald Bormann
Tel: 011 991 6000
Email: reinald.borman@meadowfeeds.co.za

Poultry and Agriculture Division

Name: Chris Visagie
Tel: 011 206 0600
Email: chris.visagie@astralfoods.com

3.3 Access to information general contacts

Email: contactus@astralfoods.com

3.4 National or Head Office

Postal Address: Postnet Suite 78, Private Bag X156, Bryanston, 2021
Physical Address: 13 Thunderbolt Lane, Lanseria Ext 26, 1748
Telephone: 012 667 5468
Email: contactus@astralfoods.com
Website: www.astralfoods.com

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of 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.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-

- 4.3.1. the objects of PAIA and POPIA;
- 4.3.2. the postal and street address, phone number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ 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 to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-
(a) any matter which is required or permitted by this Act to be prescribed;
(b) any matter relating to the fees contemplated in sections 22 and 54;
(c) any notice required by this Act;
(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.4. 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.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator

(<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and Afrikaans.

5. CATEGORIES OF RECORDS OF TORLEDO (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Annual financial statement for the company and the group	Available on the website or at the Companies and Intellectual Property Commission
Group interim results	Available on the website or at the Companies and Intellectual Property Commission
Memorandum of Incorporation	Companies and Intellectual Property Commission
Contents of the register of directors	Companies and Intellectual Property Commission

6. DESCRIPTION OF THE RECORDS OF TORLEDO (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Records available in terms of other legislation are as follows:

- Basic Conditions of Employment No. 75 of 1997
- Bills of Exchange Act No. 34 of 1964
- Broad Based Black Economic Empowerment Act No. 53 of 2003
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Competition Act No. 89 of 1998
- Consumer Affairs (Unfair Business Practices) Act No. 71 of 1988
- Consumer Protection Act No. 68 of 2008
- Copyright Act No. 98 of 1978
- Credit Agreements Act No. 75 of 1980
- Currency and Exchanges Act No. 9 of 1933
- Customs and Excise Act No. 91 of 1964
- Employment Equity Act No. 55 of 1998
- Electronic Communications Act No. 36 of 2005
- Electronic Communications and Transactions Act No. 25 of 2002
- Finance Act No. 35 of 2000
- Financial Intelligence Centre Act No. 38 of 2001
- General Pensions Act No. 29 of 1979
- Harmful Business Practices Act No. 23 of 1999
- Import and Export Control Act No. 45 of 1963
- Income Tax Act No. 95 of 1967
- Insider Trading Act No. 135 of 1998
- Insolvency Act No. 24 of 1936
- Intellectual Property Laws Amendments Act No. 38 of 1997
- Labour Relations Act No. 66 of 1995
- Long Term Insurance Act No. 52 of 1998
- Medical Schemes Act No. 131 of 1998
- Municipal Finance Management Act No. 56 of 2003

- National Building Regulations and Building Standards Act No. 103 of 1977
- National Credit Act No. 34 of 2005
- National Environmental Management: Waste Act No. 59 of 2008
- Occupational Health & Safety Act No. 85 of 1993
- Patents Act No. 57 of 1978
- Pension Funds Act No. 24 of 1956
- Price Control Amendment Act, No. 80 of 1967
- Prevention and Combating of Corrupt Activities Act No. 12 of 2004
- Promotion of Access to Information Act No. 2 of 2000
- Protected Disclosures Act No. 26 of 2000
- Protection of Businesses Act No. 99 of 1978
- Public Finance Management Act No. 1 of 1999
- SA Reserve Bank Act No. 90 of 1989
- Second Hand Goods Act No. 23 of 1955
- Sale and Services Matters Act No. 25 of 1964
- Securities Services Act No. 36 of 2004Securities
- Transfer Tax Administration Act No. 26 of 2007
- Short Term Insurance Act No. 53 of 1998
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998
- Stamp Duties Act No. 77 of 1968
- Stock Exchange Control Act No. 1 of 1985
- Tax on Retirement Funds Act No. 38 of 1996
- Trade Practices Act No. 76 of 1976
- Trade Marks Act No. 194 of 1993
- Uncertificated Securities Tax Act No. 31 of 1998
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY TORLEDO (PTY) LTD

Companies Act and Trust Property Control Act Records	Documents of Incorporation; Memorandum of Incorporation; Trust Deeds; Minutes of Trustees, Board of Directors meetings and General Meetings; Written Resolutions; Records relating to the appointment of trustees /directors / auditors / company secretary / public officer and other officers; Share Register and other Statutory Registers; and Other Statutory Records
Financial Records	Annual Financial Statements; Tax Returns; Accounting Records; Banking Records; Bank Statements; Electronic Banking Records; Asset Register; Rental Agreements; and Invoice
Income Tax Records	PAYE Records; Documents issued to employees for income tax purposes; Records of payments made to SARS on behalf of employees; All other statutory compliances; VAT; Skills Development Levies; UIF; and Workmen's Compensation.
Personnel Documents and Records	Employment contracts; Employment policies and procedures; Employment Equity Plan; Medical Aid records; Pension Fund records; Internal evaluations and disciplinary records; Salary records; Disciplinary codes; Leave records; Training records and manuals; Operating manuals; Personal records provided by personnel; Other statutory records; and Related correspondence

Other	Administration Information Technology Insurance Intellectual Property Movable and Immovable Property Operations Third Parties Medical and Health information
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8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Torledo collects personal information where it has obtained the consent of the person to whom the information belongs and where it:

- has a legitimate requirement to use or process such information; or
- meet its responsibilities to customers, employees and other natural or juristic persons.

In certain circumstances and as a normal part of the business of Torledo, Torledo may collect and process clients' Personal Information as defined in the Protection of Personal Information Act, 4 of 2013 ("POPI").

The type of information will depend on the need for which it is collected and will be processed for that specific purpose only.

Whenever possible, Torledo will inform the client what information it requires and the reasons therefor.

Examples of personal information Torledo collects includes but is not limited to:

- 8.1.1 A client's identity number, name, surname, address, marital status; and/or
- 8.1.2 Description of a client's, residence, business and assets; and/or
- 8.1.3 Financial information and banking details; and/or
- 8.1.4 Any other contact information required by Astral.

8.1.5 A more comprehensive list of personal information Torledo collects from clients are set out hereunder.

A client's Personal Information will only be used for the purpose for which it was collected and agreed to by the client.

This may include:

8.1.5.1 Providing services to clients and to carry out the transactions requested; and/or

8.1.5.2 Conducting credit reference searches and/or verification; and/or

8.1.5.3 Confirming, verifying and updating client details; and/or

8.1.5.4 Detection and prevention of fraud, crime, money laundering or other malpractice; and/or

8.1.5.5 For audit and record keeping purposes; and/or

8.1.5.6 In connection with legal proceedings; and/or

8.1.5.7 Providing communications in respect of Torledo and regulatory matters that may affect clients; and/or

8.1.5.8 In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
As to clients who are Natural Persons	Names; contact details; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence.
As to clients who are Juristic Persons / Entities	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners
As to Intermediaries / Advisors	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners
As to Contracted Service Providers	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners

Categories of Data Subjects	Personal Information that may be processed
As to Employees / Directors	Name and contact details; Identity number and identity documents including passports; Employment history and references; Employee number; Banking and financial details; Details of payments to third parties (deductions from salary) Employment contracts; Employment equity plans; Medical aid records; Pension fund records; Remuneration/salary records; Performance appraisals; Disciplinary records; Leave records; Training records; Qualifications; Parental status; Biometrics; Medical records; Marital status; Disability status; Criminal records

8.3 The recipients or categories of recipients to whom the personal information may be supplied

8.3.1 Any regulatory authority (i.e. the Financial Services Board) and the regulators they appoint for the various financial sectors;

8.3.2 Comply with any regulation passed under the relevant legislation, or any legal process

8.3.3 Protect and defend Torledo rights and property (including its intellectual property);

8.3.4 Protect public interest;

8.3.5 Legal advisors or similar service providers with the appropriate undertakings to protect the information; or

8.3.6 Group companies and subsidiaries.

8.4 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

It is a requirement of POPI to adequately protect the Personal Information Torledo holds and to avoid unauthorised access and use of clients' Personal Information. Torledo will continuously review its security controls and processes to ensure that the client's Personal Information is secure.

The following procedures are in place in order to protect the client's Personal Information:

- 8.4.1 The Authorised Person is responsible for the compliance with the lawful processing of Personal Information;
- 8.4.2 All employees (including new) are requested to acknowledge the provisions of POPI and receive training in respect of POPI from time to time;
- 8.4.3 All hard copies of documents are stored on site at the offices of Torledo in a fireproof safe;
- 8.4.4 In addition, all documents are stored electronically for backup purposes with passwords to ensure that only authorised employees may gain access to Personal Information; and
- 8.4.5 Only a select few employees have access to Personal Information. If not so authorised, access is automatically denied.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

- 9.1.1 on (www.astralfoods.com), if any;
- 9.1.2 head office of Torledo (Pty) Ltd for public inspection during normal business hours;
- 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Company Secretary will on a regular basis update this manual.

Issued by

Leonie Marupen

Group Company Secretary