

**ROBB AND CARTER MANUFACTURING
COMPANY (PTY) LTD**

(REG NO. 1950/037411/07)

**ACCESS TO INFORMATION MANUAL
(PRIVATE BODY)**

**PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION
OF ACCESS TO INFORMATION ACT 2 OF 2000**

Introduction

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, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and / or protection of any right.

The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

1. ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD OVERVIEW

ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD is engaged in manufacturing. ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD specialises in the manufacturing of industrial fasteners and machined components for the railway, mining and construction sectors.

ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD supports the constitutional right of access to information and we are committed to provide you access to our records in accordance with the provisions of the Act, the confidentiality we owe third parties and the principles of South African law.

2. CONTACT DETAILS

| | |
|---|--|
| Name of Private Body | ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD |
| Designated Information Officer | <i>C.H. Ziranek</i> |
| Email address of Information Officer | <i>robrcarter@global.co.za</i> |
| Postal address | P.O. Box 3009 Kenmare 1739 |
| Street address | 6 Jackson Street Factoria Krugersdorp 1739 |
| Phone number | 011 955 1010 |
| Fax number | 011 664 6813 |

3. REQUEST FOR ACCESS TO INFORMATION

If the request for access is granted, the notice in terms of subsection (1)(b) must state—

- (a) the access fee (if any) to be paid upon access;
- (b) the form in which access will be given; and
- (c) that the requester may lodge an internal appeal or an application with a court, as the case may be, against the access fee to be paid or the form of access granted, and the procedure (including the period) for lodging the internal appeal or application, as the case may be.

If the request for access is refused, the notice in terms of subsection (1)(b) must—

- (a) state adequate reasons for the refusal, including the provisions of this Act relied upon;

(b) exclude, from such reasons, any reference to the content of the record; and

(c) state that the requester may lodge an internal appeal or an application with a court, as the case may be, against the refusal of the request, and the procedure (including the period) for lodging the internal appeal or application, as the case may be.

4. VOLUNTARY DISCLOSURE

ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD has not published a notice in terms of Section 52(2) of the Act, however, it should be noted that the information relating to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD and its services is freely available on ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD's website. Certain other information relating to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD is also made available on such website from time to time.

Further information in the form of marketing brochures, advertising material and other public communication is made available from time to time.

5. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

Information is available, but not limited to, in terms of the following legislation to the persons or entities specified in such legislation:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 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
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Insolvency Act 24 of 1936
- Intellectual Property Laws Amendments Act 38 of 1997
- Interception and Monitoring Prohibition Act 127 of 1992
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Prevention of Organised Crime Act 121 of 1998
- Protection of Businesses Act 99 of 1978
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999

- The Co-operatives Act 14 of 2005
- The National Credit Act 34 of 2005
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

6. RECORDS HELD BY ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD

ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD maintains records on the following categories and subject matters. **However, 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.

6.1 Internal records

The following are records pertaining to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD's own affairs and those of its divisions, subsidiary and associated companies, where applicable:

- Memorandum and Articles of Association/Memorandum of Incorporation
- Financial records
- Operational records
- Marketing records;
- Internal correspondence;
- Product records;
- Statutory records;
- Internal policies and procedures;
- Records held by officials of ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD.

6.2 Personnel records

Personnel refers to any person who works for or provides services to or on behalf of ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD. This includes, without limitation, directors, executive directors, non-executive directors, all permanent, temporary and part-time staff as well as contract workers. Personnel records include the following:

- Any personal records provided to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD by their personnel;
- Any records a third party has provided to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

6.3 Customer records

Please be aware that ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD is very concerned about protecting the confidential information of its customers. Please motivate any request for customer information very carefully, having regard to Sections 63 to 67 of the Act.

Customer information includes the following:

- Any records a customer has provided to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD or a third party acting for or on behalf of ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD;
- Contractual information;
- Customer needs assessments;
- Personal records of customers;
- Credit information and other research conducted in respect of customers;
- Any records a third party has provided to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD about customers;
- Confidential, privileged, contractual and quasi-legal records of customers;
- Customer evaluation records;
- Customer profiling;
- Performance research conducted on behalf of customers or about customers;
- Any records a third party has provided to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD either directly or indirectly; and
- Records generated by or within ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD pertaining to customers, including transactional records.

6.4 Other Parties

Records are kept in respect of other parties, including without limitation contractors, suppliers, joint ventures, service providers and general market conditions. In addition, such other parties may possess records, which can be said to belong to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD. The following records fall under this category:

- Personnel, customer or **ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD** records which are held by another party as opposed to being held by ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD; and
- Records held by ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD pertaining to other parties, including financial records, correspondence, contractual records, electronic mail, logs, cached information, records provided by the other party, and records third parties have provided about the contractors/suppliers or customer.

6.5 Other Records

Further records are held including:-

- Information relating to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD's own commercial activities; and
- Research carried out on behalf of a client by ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD or commissioned from a third party for a customer;
- Research information belonging to ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD, whether carried out itself or commissioned from a third party.

7. Requesting Procedure

7.1 A person who wants access to the records must complete the necessary request form, as set out in Annexure 1, and the completed form must be sent to the address or fax number provided in this manual, and marked for the attention of the information officer.

The requester must indicate which form of access is required, and identify the right that is sought to be exercised or protected, and provide an explanation of which the requested record is required for the exercise or protection of that right. The requester must provide proof of the capacity in which the requester is requesting the information.

7.2 AVAILABILITY OF THIS MANUAL

A copy of this Manual is available on our website (www.robbcarter.co.za) or by sending a request for a copy to the Information Officer by email. The Manual may also be obtained from our registered address, the South African Human Rights Commission ("SAHRC") at the addresses set out below or from the Government Printers. This Manual will be updated from time to time, as and when required.

7.2.1 This manual is available for inspection by the general public upon request during office hours and there is no charge for viewing the manual at our offices. Copies of the manual may be made available subject to the prescribed fees.

Copies may also be requested from the South African Human Rights Commission at the address indicated below.

Fees

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fees. Any other requester who is not a personal requester must pay the required fee:

- 7.3.1 A fee will be required by the head *Mr C.H. Ziranek* before further processing of the request in terms of S54 of the Act;
- 7.3.2 A requester fee of R35 should be paid, this amount will be refunded should the request for access be refused;
- 7.3.3 A portion of the access fee (not more than one third) may be required before the request is considered;
- 7.3.4 The requester may lodge an application with a court against the payment of the request fee in terms of S54(3)(b) of the Act;
- 7.3.5 The head may withhold a record until the requester has paid the applicable fees.

8. Details of the South African Human Rights Commission

Any queries with regard to this manual should be directed to:

The South African Human Rights Commission; PAIA Unit

Research and Documentation Department

Private Bag X2700

Houghton

2041

Phone: 011 877 3600

Fax: 011 484 0582

Email: PAIA@sahrc.org.za

Website: www.sahrc.org.za

Signed for and on behalf of ROBB AND CARTER MANUFACTURING COMPANY (PTY) LTD on the 12 day
of DECEMBER 2011.



C.H. Ziraneke

Information Officer

Witness

ELAINE FABER

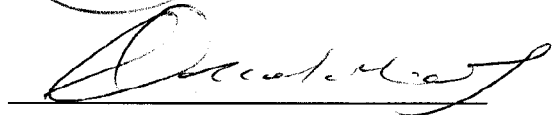
Name

DOLE MARAIS

Name



Signature



Signature

ANNEXURE 1

FORM A

REQUEST FOR ACCESS TO RECORD OF PUBLIC BODY

(Section 18 (1) of the Promotion of Access to Information Act, 2000

(Act No. 2 of 2000)

[Regulation 2]

FOR DEPARTMENTAL USE

Reference number: _____

Request received by: _____

(state rank, name and surname of information officer/deputy information officer) on
_____ (date) at _____ (place).

Request fee (if any): R.....

Deposit fee (if any): R.....

Access fee: R.....

SIGNATURE OF INFORMATION
OFFICER

(a)

A. Particulars of public body

The Information Officer:

Mr C.H. Ziranek
Information Officer
Robb and Carter Manufacturing
Company (Pty) Ltd
P.O. Box 3009
Kenmare
1739

B. Particulars of person requesting access to the record

- (a) *The particulars of the person who requests access to the record must be recorded below.*
- (b) *Furnish an address and/or fax number in the Republic to which information must be sent*
- (c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname: _____
Identity/Passport number: _____
Postal address: _____
Fax 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 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.*
- (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.***

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

Records concerning _____, specifically: _____

Reference number, if available: _____

2. Any further particulars of record: _____

E. Fees

(b) 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.

(c) You will be notified of the amount required to be paid as the request fee.

(d) 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.

(e) 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: _____ _____ |
|----------------------------|--|

Mark the appropriate box with an "X".

NOTES:

(a) Your indication as to the required form of access depends 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 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) | | transcription of soundtrack* (written or printed document) |
|--|----------------------------------|--|--|

| | | | |
|---|-------------------------|---------------------------------------|---|
| | cassette) | | |
| 4. If record is held on computer or in an electronic or machine – readable form: | | | |
| | Printed copy of record* | Printed copy 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 |
| A postal fee is payable. | | | NO |
| <i>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.</i> | | | |
| In which language would you prefer the record? | | | |

G. 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 thereof 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