Registration Number of Company: 1960/004393/06

NAME OF COMPANY: SPANJAARD LIMITED
(including all its subsidiaries)

PREPARED IN ACCORDANCE WITH
SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT

2/2000

(the "ACT")
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1. INTRODUCTION TO SPANJAARD LIMITED (Section 51 (1) (a))

Established in 1960, Spanjaard Limited is a leading and proudly South African manufacturer of special lubricants and allied chemical products. Since its listing on the Johannesburg Stock Exchange (JSE) in 1987, it has successfully grown its international footprint and has an established presence on five continents and in 31 countries across the globe.

2. COMPANY CONTACT DETAILS (Section 51 (1) (a))

Directors:

Kentin Welgemoed (Chief Executive Officer)
Graham Cort (Executive Director)
Clinton Palmer (Executive Director)
Ian Saunders (Executive Director)
Tracy Stewart (Executive Director)
Prof DP van der Nest (Independent Non-Executive Chairman)
Shaila Hari (Independent Non-Executive Director)

Name of private body: SPANJAARD LIMITED
Information Officer (IO): Elaine Martins
Email address of IO: elaine@spanjaard.biz
Postal address: PO Box 7294, Johannesburg, 2000
Physical address: 748 – 750 Fifth Street, Wynberg, Sandton, 2090
Phone number: 011 386 7100
Fax number: 011 887 2962
Website: www.spanjaard.biz

3. THE ACT AND SECTION 10 GUIDE (Section 51(1) (b))

3.1. The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

3.2. Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

3.3. Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041
Telephone Number: +27-11-877 3600
Fax Number: +27-11-403 0625
Website: www.sahrc.org.za
4. APPLICABLE LEGISLATION (Section 51 (1) (c))

Please note that each entity needs to assess which legislation is applicable to it and thereafter list such legislation, below is just an example for ease of reference.

Spanjaard keeps records in accordance with the following legislation, all of which are available, subject to such legislation and the Act:

- Basic Conditions of Employment Act, No 75 of 1997
- Companies Act, No 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act, No 130 of 1993
- Employment Equity Act, No 55 of 1998
- Income Tax Act, No 95 of 1967
- Labour Relations Act, No 66 of 1995
- Occupational Health & Safety Act, No 85 of 1993
- Promotion of Access to Information Act, No 2 of 2000
- Skills Development Act, No 97 of 1998
- Skills Development Levies Act, No 9 of 1999
- Unemployment Contributions Act, No 4 of 2002
- Unemployment Insurance Act, No 63 of 2001
- Value Added Tax Act, No 89 of 1991
- Protection of Personal Information Act No. 4 of 2013
- Consumer Protection Act No. 68 of 2008

5. SCHEDULE OF RECORDS (Section 51 (1) (d))

5.1. Human Resources

- Personal records of the personnel
- Employment contracts
- Medical Aid records
- Pension fund and retirement benefit records
- Disciplinary records
- Salary records
- Training records
- Correspondence relating to personnel
- Leave records
- UIF Returns
- Internal policies and procedures

5.2. Secretarial

- Memorandum of Incorporation
- Minutes of the Board of Directors
- Shareholders agreements
- Company Register
- Records relating to the appointment of Directors/Auditors
- Share Certificates
- Resolutions
- Minute Book
5.3. Financial and administration

- VAT records
- PAYE records
- Fixed asset register
- Banking records
- UIF records
- Management Reports
- Invoices
- Debtors and creditors information

5.4. Information Management and Technology

- Service Level Agreements
- Equipment Register
- Policies, procedures and guidelines
- Licensing agreements

5.5. Marketing and communication

- Marketing strategies
- Communications strategies
- Agreements

5.6. Operations

- Access control records
- Archival administration documentation
- Insurance (insurance arrangements, policies and claims)
- Asset register
- BEE statistics

5.7. Safety Records

- Safety manuals
- Occupational Health and Safety records
- Records if incidents in the workplace

5.8. Customer/clients and third parties related records

- Contracts with clients
- Any records that the client has provided to Spanjaard or a third party acting for or on behalf of Spanjaard
- Records, reports, designs and the like generated by Spanjaard for their clients
- Records generated pertaining to the client, including transactional records

5.9. Other records

- Legal proceedings records
6. FORM OF REQUEST (Section 51 (1) (e))

To facilitate the processing of your request, kindly:


6.2. Address your request to the Head of the Company (CEO) or the Information Officer.

6.3. Provide sufficient details to enable the COMPANY to identify:
   (a) The record(s) requested;
   (b) The requester (and if an agent is lodging the request, proof of capacity);
   (c) The form of access required;
   (d) (i) The postal address or fax number of the requester in the Republic;
        (ii) If the requester wishes to be informed of the decision in any manner (in addition to
            written) the manner and particulars thereof;
   (e) The right which the requester is seeking to exercise or protect with an explanation of the
      reason the record is required to exercise or protect the right.

7. PRESCRIBED FEES (Section 51 (1) (f))

Please see attached for the PAIA Fee Schedule (Annexure A) as well as the Form C Request for Access
   to Record of Private Body (Annexure B).

The following applies to requests (other than personal requests):

7.1. A requester is required to pay the prescribed fees (R50.00) before a request will be
      processed;

7.2. If the preparation of the record requested requires more than the prescribed hours (six), a
      deposit shall be paid (of not more than one third of the access fee which would be payable if
      the request were granted);

7.3. A requester may lodge an application with a court against the tender/payment of the
      request fee and/or deposit;

7.4. Records may be withheld until the fees have been paid.

7.5. The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS
      COMMISSION at www.sahrc.org.za.

Signed at Spanjaard on this 7th day of February 2019

Signed: Kentin Wessels, Chief Executive Officer,
Spanjaard Limited
NOTICE IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION 2 OF 2000
RE: FEES ASSOCIATED WITH PAIA REQUESTS ARE DETERMINED BY THE
REGULATIONS ONLY AND NOT THROUGH OTHER APPLICABLE LAWS OR POLICIES

This Notice serves to state that the South African Human Rights Commission (the Commission) hereby confirms that the costs associated with all requests made under the Promotion of Access to Information Act 2 of 2000 (PAIA) are determined by the Regulations relating to PAIA only, and not by any other laws or regulations. Therefore, any demands made by a public or private body for the payment of additional fees with respect to PAIA requests are invalid.

The Commission is an independent public body currently mandated under PAIA to monitor the implementation of the Act. In accordance with its responsibilities to ensure compliance with PAIA, the Commission issues this notice to bring clarity to all interested parties that it is only the Minister of Justice and Constitutional Development who has the power to make decisions regarding fees associated with PAIA requests. The Commission further confirms that Value-Added Tax (VAT) is only payable by institutions who have registered as VAT vendors.

1. **The Promotion of Access to Information Act**
   PAIA gives effect to the constitutional right to access of information, as provided for under section 32 of the Constitution. Although responding to requests and reproducing records in an accurate and orderly manner takes time and resources, section 9 of the Act specifically calls for the establishment of mandatory mechanisms and procedures to ensure that access to records of both public and private bodies is “as swiftly, inexpensively and effortlessly as reasonably possible.” [emphasis added].

   Furthermore, section 92 of the Act grants the Minister of Justice and Constitutional Development the power to make regulations pertaining to fees associated with requests made to both public and private bodies.

2. **Regulations to PAIA**
   In February 2002, the Minister of Justice and Constitutional Development published a schedule of fees for PAIA requests in the Gazette, which provided for the following:

   **Fees for Requesting Records**
   Requesters are required to pay a fee for requesting access to records from both public and private bodies. The fee for requesting records from a public body is R35, while the fee for requesting records from a private body is R50. It is important to note that people who are requesting access to their personal information are exempt from paying a fee. Furthermore, people who earn less than R14,712 per annum (if single) and R27,192 per annum (if married or have a life partner), are also exempt from paying the request fees.

   **Fees for Accessing Records**
   Requesters are also required to pay fees for accessing the records of public and private bodies, which include fees associated with the search for, preparation of, and reproduction of documents. The breakdown of fees for requests to both public and private bodies are as follows:

   **Public Bodies:**
   - Copy per A4 page – 60 cents
   - Printing per A4 page – 40 cents
   - Copy on a CD – R40
   - Transcription of visual images per A4 page – R22
   - Copy of a visual image – R60
   - Transcription of an audio recording per A4 page – R12
   - Copy of an audio recording – R17
   - Search and preparation of the record for disclosure – R15 per hour or part thereof, excluding the first hour, reasonably required for the search and preparation
   - Actual postage fee

   **Private Bodies:**
   - Copy per A4 page – R1.10
   - Printing per A4 page – 75 cents
   - Copy on a CD – R70
   - Transcription of visual images per A4 page – R40
   - Copy of a visual image – R60
   - Transcription of an audio recording per A4 page – R20
   - Copy of an audio recording – R30
   - Search and preparation of the record for disclosure – R30 per hour or part thereof, excluding the first hour, reasonably required for the search and preparation
   - Actual postage fee

3. **Registered VAT Vendors**
   The Commission further confirms that Value-Added Tax (VAT) is only payable by institutions who have registered as VAT vendors, as required under section 23 of the Value-Added Tax Act of 1991.

Sincerely,

[Signature]
Advocate L M Mushwani
Chair of the South African Human Rights Commission

Chairperson: ML Mushwana; Deputy Chairperson: P Govender; Commissioners: L Mokate, B Malatji, J Love, D Titus
Chief Executive Officer: K Ahmed
FORM C

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

The Head:

B. Particulars of person requesting access to the record

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>The particulars of the person who requests access to the record must be given below.</td>
</tr>
<tr>
<td>(b)</td>
<td>The address and/or fax number in the Republic to which the information is to be sent must be given.</td>
</tr>
<tr>
<td>(c)</td>
<td>Proof of the capacity in which the request is made, if applicable, must be attached.</td>
</tr>
</tbody>
</table>

Full names and surname:
Identity 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

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>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.</td>
</tr>
<tr>
<td>(b)</td>
<td>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.</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Disability:</th>
<th>Form in which record is required</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Mark the appropriate box with an X.</td>
</tr>
</tbody>
</table>

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 for 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:

| 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 | transcription of soundtrack* |
| audio cassette | 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? Postage is payable.

| YES | NO |
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…………………………. This………… day of …………………………….20

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE