



TRENCOR LIMITED
(INCORPORATED IN THE REPUBLIC OF SOUTH AFRICA)
(REGISTRATION NO 1955/002869/06)
("Trencor")

AND SUBSIDIARY INCORPORATED IN THE REPUBLIC OF SOUTH AFRICA

A Guide to
ACCESSING OUR INFORMATION

Manual in terms of Section 51 of the
Promotion of Access to Information Act, No 2 of 2000, ("the Act")

(updated 24 May 2021)

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Introduction

This manual is compiled in terms of section 51 of the Act and pertains to Trencor Limited and its subsidiary Incorporated in the Republic of South Africa to provide information regarding the procedure to be followed in requesting information for the purpose of exercising or protecting rights, as allowed in terms of the Act.

Trencor Limited is a cash company listed on the JSE Limited. It intends to distribute its cash resources to shareholders as and when these become commercially available whereafter it is expected to delist and be deregistered in due course.

The group's South African subsidiary is Trencor Services Proprietary Limited (Registration no 1967/004868/07).

Inside these pages you will be able to view the categories of information which we possess. You will also be shown the correct procedure to follow should you require and be entitled to access to any of this information.

A copy of this manual is also available on our website www.trencor.net.

A copy of the Act may be downloaded from:

<http://www.polity.org.za/html/govdocs/legislation/2000/index.html>

Contact details (as required by section 51(1)(a) of the Act)

Full Name	: Trencor Limited
Registration Number	: 1955/002869/06
Registered Office and Postal Address	: 13th Floor The Towers South Heerengracht Cape Town 8001
Information Officer	: Mr RA Sieni
Telephone Number	: 021 421 7310
Fax Number	: 021 419 3692
Email Address	: info@trencor.net
Website	: http://www.trencor.net

The official guide (as required by section 51(1)(b) of the Act)

A Guide has been compiled in terms of Section 10 of the Act by the South African Human Rights Commission (SAHRC) containing information reasonably required by a person wishing to exercise or protect any right in terms of the Act. It is available in all of the official languages.

The Guide is available for inspection, inter alia, at the offices of the SAHRC at Braampark Forum 3, 33 Hoofd Street, Braamfontein (tel 011 877 3600, fax 011 403 0668, email PAIA@sahrc.org.za) and on its website at <http://www.sahrc.org.za>.

Information available in terms of the Act (as required by section 51(1)(e) of the Act)

We hold the following categories of information where applicable to our business and its operations:

(a) STATUTORY COMPANY INFORMATION

- Certificates;
- Memorandum of incorporation;
- Minute books, proxy forms, CM and CoR, resolutions passed at general meetings;
- Register of allotments, members, mortgages, debentures, fixed assets, directors' shareholdings, directors and officers;
- Attendance registers;
- Audited annual financial statements;
- Books of account regarding information required by the Companies Act, No 71 of 2008;
- Supporting schedules to books of account and ancillary books of account;
- Information in terms of the Listings Requirements of the JSE Limited; and
- Dividend and interest payment lists.

(b) ACCOUNTING RECORDS

- Books of account including journals and ledgers; and
- Delivery notes, orders, invoices, statements, receipts and vouchers.

(c) HUMAN RESOURCES RECORDS

- Employee and payroll records and registers;
- Employment equity plan;
- Training records;
- Staff records;
- Employee contracts;
- Incentive schemes;
- HR guidelines and policies;

- Group personal accident policies;
 - Employee share option plan; and
 - Code of ethics.
- (d) RETIREMENT FUNDING RECORDS
- Retirement fund rules;
 - Retirement fund audited annual financial statements;
 - Minutes of meetings of trustees and members;
 - Actuarial valuation reports;
 - Contribution reports;
 - Group life and disability policies and claims; and
 - Administration and management agreements.
- (e) MOVABLE PROPERTY
- Asset register;
 - Finance and lease agreements; and
 - Deeds of pledge.
- (f) INTELLECTUAL PROPERTY
- Patents, patent applications and inventions;
 - Trade marks, trade names and protected names;
 - Copyrights; and
 - Agreements relating to intellectual property such as licence agreements, secrecy agreements, research and development agreements, consulting agreements, use agreements, joint venture agreements and joint development agreements.
- (g) AGREEMENTS AND CONTRACTS
- Material agreements concerning provision of services or materials and funding/finance agreements;
 - Joint venture agreements, partnership agreements, participation, franchise, co-marketing, co-promotion or other alliance agreements;
 - Acquisition or disposal documentation;
 - Warranty agreements;
 - Sale agreements;
 - Purchase or lease agreements; and
 - Non-disclosure and confidentiality agreements.
- (h) TAXATION
- Copies of income tax returns and assessments and other tax returns and documents.

(i) LEGAL

- Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation;
- Settlement agreements; and
- Material licences, permits and authorisations.

(j) INSURANCE

- Insurance policies;
- Claim records; and
- Details of insurance coverages, limits and insurers.

(k) INFORMATION TECHNOLOGY

- Hardware;
- Operating systems;
- Telephone lines, leased lines and data lines;
- WAN and LAN installations;
- Software packages;
- Disaster recovery plans;
- Internal systems support and programming / development;
- Capacity and utilization of current systems;
- Agreements and licenses; and
- Audits.

Procedure for requesting access to the above information

If you wish to request access to any of the above categories of information, you are required to complete a request form as set out in Annexure A hereto. These forms are available from:

- our information officer (whose contact information is detailed above) or from our website (<http://www.trencor.net>);
- the SAHRC website (<http://www.sahrc.org.za>); and
- the Department of Justice and Constitutional Development website (<http://www.doj.gov.za>).

There is a prescribed fee (payable in advance) for requesting and accessing information in terms of the Act. Details of these fees are contained in the request form and detailed in Annexure B hereto.

You may also be called upon to pay the additional fees prescribed by regulation for searching for and compiling the information which you have requested, including copying charges.

It is important to note that access is not automatic. You must identify the right you are seeking to exercise or protect and explain why the record you request is required for the exercise or protection of that right.

Information available in terms of other legislation (as required by section 51(1)(d) of the Act)

Information is also available in terms of certain provisions of the following statutes, if and where applicable:

- Basic Conditions of Employment Act No 75 of 1997;
- Companies Act No 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act No 130 of 1993;
- Credit Agreements Act No 75 of 1980;
- Customs and Excise Act No 91 of 1964;
- Debt Collectors Act No 114 of 1998;
- Electronic Communications and Transactions Act No 25 of 2002;
- Employment Equity Act No 55 of 1998;
- Financial Intelligence Centre Act No 38 of 2001;
- Financial Markets Control Act No 55 of 1989;
- Income Tax Act No 58 of 1962;
- Labour Relations Act No 66 of 1995;
- Legal Deposit Act No 54 of 1997;
- National Environmental Management Act No 107 of 1998;
- Occupational Health and Safety Act No 85 of 1993;
- Patents Act No 57 of 1978;
- Prevention of Organised Crime Act No 121 of 1998;
- Promotion of Access to Information Act No 2 of 2000;
- Public Finance Management Act No 1 of 1999;
- Securities Services Act No 36 of 2004;
- Short-term Insurance Act No 53 of 1998;
- Skills Development Levies Act No 9 of 1999;
- Trademarks Act No 194 of 1993;
- Transfer Duty Act No 40 of 1949;
- Unemployment Insurance Act No 63 of 2001; and
- Value added Tax Act No 89 of 1991.

Information automatically available (as required by section 51(1)(e) of the Act)

The following categories of records are automatically available for inspection, purchase or photocopying. You do not need to request this information in terms of the Act.

1. Newsletters and booklets;
2. Circulars to share and debenture holders;
3. Pamphlets / Brochures;
4. Published press releases and announcements;

5. Published interim financial reports, provisional annual financial statements and audited annual financial statements;
6. Various registers in terms of the Companies Act No 71 of 2008;
7. Other literature intended for public viewing; and
8. Website <http://www.trencor.net>.

ANNEXURE A

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 Trecor Limited (and subsidiaries)

The Information Officer, Trecor Limited (and subsidiary)
13th Floor, The Towers South, Heerengracht, Cape Town 8001
Telephone Number 021 421 7310 Fax Number 021 419 3692
Email address: info@trecor.net

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 of South Africa 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:

..... 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:
-
-
-
-
- 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:

.....

.....

Mark the appropriate box with an **X**.

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* (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 by you.			<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 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

ANNEXURE B

AN EXPLANATORY NOTE ON FEES TO BE CHARGED WHEN GRANTING A REQUEST FOR ACCESS TO INFORMATION IN TERMS OF THE ACT

The fees chargeable are contained in Part III of Annexure A of the Regulations to the Act, a copy of which is attached. The present charges are as follows:

1. Copies of a manual

Should an individual require a copy of the private body's manual, a fee of R1,10 is chargeable for every photocopy of an A4 page or part thereof.

2. Reproduction fees¹

Reproduction fees apply to obtaining copies or transcriptions of information which is automatically available from the private body. The fees are listed in paragraph 2 of Part III of Annexure A to the Regulations.

3. Access fees²

Access fees are chargeable for copies or transcriptions of information requested under this Act. The fees are listed in paragraph 4 of Part III of Annexure A to the Regulations.

4. Other fees

- 4.1 A request fee³ of R50,00 is payable by a requester who is seeking access to a record containing information which is not personal to the requester.
- 4.2 A search fee⁴ may be charged at a rate of R30,00 per hour or part thereof for searching and preparing the record for disclosure provided such time was reasonably required for that purpose.
- 4.3 If the request is not limited to records containing information which is personal to the requester and if the head of the private body is of the opinion that the time taken to give effect to the request will exceed six hours the requester can be called upon to pay a deposit of not more than one third of an estimate of the access fee which will become payable.⁵
- 4.4 If a copy of a record is posted to a requester, the requester is obliged to pay the actual postage payable.

¹ Section 52(3) and Regulation 1(1)

² Section 54(7) and Regulation 11(3)

³ Section 54(1) and Regulation 11(2)

⁴ Annexure "A", Part III, Item 4(1)(f)

⁵ Section 54(2)

PART III
FEES IN RESPECT OF PRIVATE BODIES

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.
2. The fees for reproduction referred to in regulation 11(1) are as follows:

	R
(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 compact disc	7,50
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images.....	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:

	R
(1) (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 compact disc	7,50
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images.....	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
(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.	
(2) 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 requester.	
(3) The actual postage is payable when a copy of a record must be posted to a requester.	