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1 INTRODUCTION AND PURPOSE OF THIS DOCUMENT

This manual grants access to records held by THE SPAR GROUP LTD (Company Registration Number: 1967/001572/06), hereinafter referred to as 'The Company' or 'SPAR', and its South African subsidiaries. For more information on the Company's South African subsidiaries, requesters are referred the Company's latest annual integrated report, which is available at [SPAR - One of the largest retailers across Southern Africa.](#)

2 BUSINESS OVERVIEW

The Company is a public company listed on the JSE Limited, South Africa's stock exchange, and invests in subsidiaries, joint ventures and associates. The Company is primarily a wholesaler and distributor of goods and services to SPAR and SaveMor supermarkets, Build it building materials outlets, TOPS at SPAR liquor stores and Pharmacy at SPAR pharmacy and healthcare outlets. Seven distribution centres provide goods and services to retail stores in South Africa, Swaziland, Botswana, Lesotho, Mozambique, Zambia and Namibia.

Requests for THE SPAR GROUP LTD information must be made to the Company Secretary, as per the details below and in the form reflected in annexure "A". All requests for THE SPAR GROUP LTD information shall be considered in the light of the relevant sections in the Act.

3 INFORMATION REQUIRED UNDER SECTION 51(1) (a) OF THE ACT

Designated Head of THE SPAR GROUP LTD: Brett Botten

Postal Address of THE SPAR GROUP LTD: PO Box 1589, Pinetown, 3600

Street Address of THE SPAR GROUP LTD: 22 Chancery Lane, Pinetown, 3620

Tel. No of THE SPAR GROUP LTD: 031 719 1900

E- Mail address of THE SPAR GROUP LTD: info.officer@spar.co.za

Person delegated to deal with requests (for "the designated head"): Kevin O'Brien,
Company Secretary

E-mail address of the designated head: info.officer@spar.co.za

4 DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10

A Guide has been compiled in terms of Section 10 of Promotion of Access to Information Act 2 OF 2002 ("PAIA") by the South African Human Rights Commission (SAHRC). It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

The Guide is available for inspection, inter alia, at the office of the South African Human Rights Commission at Braampark Forum 3, 33 Hoofd Street, Braamfontein, Johannesburg, Gauteng and at www.sahrc.org.za.

For further information please contact the SAHRC:

Postal Address: Private Bag 2700, Houghton, 2041
Telephone Number: +27-11-877 3600
Fax Number: +27-11-403 0625
Email: mnyuswa@sahrc.org.za

5 RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Requesters may make requests for information that may be requested in accordance with applicable South African legislation, including:

Agricultural Products Standards Act 119 of 1990

- All records required by the Act.

Basic Condition of Employment Act 75 of 1997

- Each employee's name and occupation;
- Time worked by each employee;
- Remuneration paid to each employee; and
- All other records required by the Act.

Broad Based Black Economic Empowerment Act 53 Of 2003

- All records required by the Act and the relevant Codes.

Businesses Act 71 of 1991

- License held in terms of the Act.

Companies Act 61 of 1973

- Certificate of Incorporation;
- Certificate of Change of Name (if any);
- Certificate to Commence Business;
- Memorandum of Incorporation and/or Articles of Association;
- Minute books, general and special resolutions passed at any meeting of Shareholders of the
 - Company, or
 - Any class of Shareholders;
- Register of Members/ Shareholders/ Directors/ Company Secretary/ Public Officers;
- Branch registers;
- Annual Financial Statements;
- Books of Account required by the Act; and
- All other records required by the Act.

Compensation for Occupational Injuries and Diseases Act 130 of 1993

- The register or other record of the earnings and other prescribed particulars of all employees, for example: wages paid, time worked, and payment made for piece-work and overtime.

Competition Act 89 of 1998

- All records required by the Act.

Consumer Protection Act 68 of 2008

- All records required by the Act

Customs & Excise Act 91 of 1964

- Bills of entry
- Books of account required by the Act
- Records of the person from whom imported goods were obtained and, if he is the importer or manufacturer or owner, as to the place where the duty due thereon was paid, the date of payment, the particulars of the entry for home consumption and the marks and numbers of cases, packages, bales and other articles concerned.

Designs Act 195 of 1993

- All records required by the Act.

Electronic Communications and Transactions Act 25 of 2002

- All records required by the Act.

Employment Equity Act 55 of 1998

- All records required by the Act.

Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972

- All other records required by the Act.

Income Tax Act 58 of 1963

- All ledgers, cash books, journals, cheque books, bank statements, deposit slips, pay cheques;
- invoices, stock lists and all other books of account;
- Signed copy of Annual Financial Statements;
- Books of Account recording information required by the Companies Act;
- Invoices – issued and received; and
- All other records required by the Act.

Insolvency Act 24 of 1936

- All other records required by the Act.

Labour Relations Act 66 of 1995

- All records required in compliance with any collective agreement, arbitration award or determination;
- made in terms of the National Minimum Wage Act 9 of 2018;

- All records of the prescribed details of any strike, lock-out or protest action involving employees;
- All disciplinary records; and
- All other records required by the Act.

Liquor Act 27 of 1989

- All records of liquor licenses in respect of all stores

Liquor Products Act 60 of 1989

- Import certificate.

Merchandise Marks Act 17 of 1941

- All other records required by the Act.

National Credit Act 89 of 1991

- All records which may be required by the Act.

Occupational Health and Safety Act 85 of 1993

- A copy of the Act;
- An incident register certificate of compliance (in respect of all electrical installations);
- First Aid certificate (valid for 3 years);
- Refrigeration / Air-conditioning record book; and
- All other records required by the Act.

Patents Act 57 of 1978

- All other records required by the Act.

Promotion of Access to Information Act 2 of 2000

- All other records required by the Act.

Protection of Personal Information Act 14 of 2013

- All other records required by the Act.

Regulation of Interception of Communications Act 70 of 2002

- All records required by the Act.

Regulation of Interception of Communications and Provision of Communication

- All other records required by the Act.

Related Information Amendment Act 48 of 2008

- All other records required by the Act.

Pension Funds Act 24 of 1956

- All records required by the Act.

Skills Development Act 97 of 1998

- Annual training reports and the annual training plan.

Skills Development Levies Act 9 of 1999

- All records required by the Act.

Stamp Duties Act 77 of 1968

- All other records required by the Act.

Standards Act 29 of 1993

- All other records required by the Act.

Unemployment Insurance Act 30 of 1966

- Records detailing the contributions by contributors employed by the employer in respect of earnings paid, time worked, payments made for piece work and overtime.

Trademarks Act 194 of 1993

- All other records required by the Act.

Value Added Tax Act 89 of 1991

- Books of account, documents recording the supply of goods to or by the vendor;
- Invoices, tax invoices, credit and debit notes, bank statements, deposit slips, stock lists and paid cheques; and
- All other records required by the Act.

6 RECORDS AUTOMATICALLY AVAILABLE

Records lodged in terms of Government requirements with various statutory bodies, including the Companies and Intellectual Property Commission.

7 SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE COMPANY

Company Records:

- Allotment sheets and return allotments;
- Annual return and supporting documents;
- Company register - Branch register, Index of members, Register of debenture holders, Register of director's attendance, Register of directors and officers, Register of directors' interest on contracts, Register of members and Register of pledges and mortgages;
- Contracts/sale agreements;
- Documents of incorporation - Certificate of change of name, Certificate of incorporation, Certificate to commence business and Founding statement (including amendments);
- Investment records;
- Leases;
- Minutes of meetings - Board meetings, Committee meetings, General meetings and Minutes books;
- Notices of general and class meetings proxy forms;

- Pension fund account records;
- Special and general resolutions - Class meetings, CM25 and CM26.

Financial Records:

- Annual financial statements;
- Books of account;
- Costing records;
- Creditor's invoices and statements;
- Dividend and interest payment list;
- Fixed asset register;
- Ledgers, schedules and journals;
- Petty cash books;
- Stock records and supporting schedules;
- All applicable tax records;
- Import and export records;
- Invoices, receipts and cash register tapes (readings);
- The accounting instruction manuals and the system and programme documentation;
- Bank statements, deposit slips and instructions;
- Accounting charts, access codes, program documentation & system instruction manuals;
- Paid cheques and cheque books;
- Stock sheets and control lists;
- Rail and shipping documents;
- Year end working papers;
- Contracts and agreements for debts;
- Employee payrolls with wage and salary details;
- Salary wage register;
- Tax returns of employees;
- Investment records - schedules and documents from date of investment sold;
- Transfer of marketable securities.

Labour Records:

- Accident books and records;
- Address Lists;
- Disciplinary Code and Records;
- Employee benefits arrangements rules and records;
- Employment Contracts;
- Employment Equity Plan
- Forms and Applications;
- Grievance Procedures;
- Leave Records;
- Medical Aid Records;
- Payroll reports/ Wage register;
- Pension Fund Records;
- Safety, Health and Environmental records;
- Salary Records;

- SETA records
- Standard letters and notices
- Training Manuals;
- Training Records;
- Workplace and Union agreements and records.

Risk Management and Audit

- Audit reports;
- Risk management frameworks; and
- Risk management plans.

Safety, Health and Environment

- Complete Safety, Health and Environment Risk Assessment
- Environmental Managements Plans
- Inquiries, inspections, examinations by environmental authorities

IT Department

- Computer / mobile device usage policy documentation;
- Disaster recovery plans;
- Hardware asset registers;
- Information security policies/standards/procedures;
- Information technology systems and user manuals
- Information usage policy documentation;
- Project implementation plans;
- Software licensing; and
- System documentation and manuals.

8 PURPOSE OF PROCESSING OF PERSONAL INFORMATION

The company processes information for various purposes including but not limited to: employee administration, sales and marketing initiatives, customer care processes and communicating with customers directly.

9 DATA SUBJECT CATEGORIES AND THEIR PERSONAL INFORMATION

Employees – personal information associated with the lifecycle of an employee;
Retailers – personal information of retailers including business particulars;
Suppliers – personal information of suppliers including business particulars;
Consumers – personal information of customers which are used for SPAR Rewards and other marketing initiatives;
General public – tracking general enquiries and web site visits;
Investors – records as maintained by the Company Secretary; and
Media – records of media interactions.

10 PLANNED RECIPIENTS OF PERSONAL INFORMATION (NON-EXHAUSTIVE LIST ONLY)

Statutory authorities – such as the Consumer Goods Council, the Department of Labour, the UIF State Body, the South African Revenue Service;
Financial institutions – such as FNB, Standard Bank, Old Mutual, Nedbank;
Medical schemes – such as Tiger Brands medical Scheme, Sharks Medical, Momentum Multiply;
Employee pension and provident funds – such as Old Mutual; and
Industry bodies – various.

11 PLANNED TRANS-BORDER FLOWS OF PERSONAL INFORMATION

Flows to service providers/operators in Namibia, Botswana, Mozambique, Eswatini, Seychelles.
Flows to subsidiaries and affiliates in Europe and Sri Lanka.
Flows through the use of social media.

12 SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

SPAR understands the value of information and will take all reasonable steps to protect the information from loss, misuse, or unauthorised access.

SPAR's responsibility is to:

- protect and manage information that it holds about its stakeholders;
- make use of electronic and computer safeguards, such as firewalls and data encryption, to secure stakeholders' information;
- have physical and electronic access control to its premises; and
- only authorise access to information to those employees who require it to fulfil their designated responsibilities.

SPAR is committed to use appropriate technical and other security measures in line with acceptable industry standards, to safeguard stakeholders' information.

13 DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS

The requester must complete Annexure A below and submit this form together with a request fee, to the head of the Company. The form must be submitted to the head of the Company at his/ her physical or electronic mail address, as stated earlier in this manual.

Form of request:

The requester must provide sufficient detail on the request form to enable the designated head to identify the record and the requester.

The requester should indicate which form of access is required.

The requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)] of PAIA.

The requester 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)] of PAIA.

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

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

Every other requester, who is not a personal requester, must pay the required request fee.

The designated head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)] of PAIA.

The fee that the requester must pay to a private body is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees 54(3)(b)] of PAIA.

After the designated head of the private body has made a decision on the request, the requester must be notified in 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)] of PAIA.

14 GROUNDS FOR REFUSING A REQUEST

SPAR may refuse access to records on one or more of the grounds outlined in Chapter 4 of the Act pertaining to: "Grounds for Refusal of Access to Records".

15 AVAILABILITY OF THE MANUAL

Copies of this manual are available for inspection at the Office of the Company Secretary of the Company and copies can be made available free of charge. Copies are also available on the Company's website at [SPAR - One of the largest retailers across Southern Africa](#).

Requests for information must be submitted in accordance with the prescribed format and must be accompanied by the prescribed fee as indicated herein.

Signature of Designated Head of the Private Body

Name of Designated Head of the Private Body

(Note: each page should be initialled to complete the signing process).

Date of
signature _____

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The breakdown of fees for accessing records of private bodies are:

The following is a breakdown of the fees structure for the purposes of determining the manner in which fees relating to a request for access to a record of a private body are to be calculated:

Regulation 187 published in the Government Gazette on the 15 February 2002:

Copy per A4 Page	R1.10
Printing per A4 page	75 cents
Copy on a CD/memory stick (4 GB)	R70
Transcription of visual images per A4 page	R40
Copy of a visual image	R60
Transcription of an audio recording per A4 page	R20
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.

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

16 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:

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B. Particulars of person requesting access to the record:

Full names and surname:
Identity number:
Postal address:
Fax number:
Telephone number:
Email address:

Capacity in which request is made, when made on behalf of another person:

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C. Particulars of person on whose behalf request is made:

Full names and surname:
Identity number:

Particulars of record:

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

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2. Reference number if available:

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3. Any further particular of record:

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.....

E. Notice of decision regarding request for access

- 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 exception of the payment of any fee, please state the reason for your exemption.

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