



Raubex Group Limited

Registration Number: 2006/023666/06

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF
ACCESS TO INFORMATION ACT (Act 2 of 2000, as amended)
for

RAUBEX GROUP LTD AND ITS SUBSIDIARIES

Compiled 07 April 2017

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1. Introduction and Contact Details [Section 51(1)(a)]

Raubex is a construction group operating across all nine South African provinces and throughout southern Africa with a specific focus on infrastructure development.

Contact details

Name of Private Body	The Raubex Group and its subsidiaries
Designated Information officer	Heike Ernst
E-mail address of Information Officer	legal@raubex.com
Postal address	P O Box 66192 Highveld 0169
Street address	Building 1, Highgrove Office Park 50 Tegel Avenue Highveld Centurion 0169
Phone number	012 648 9400
Fax number	086 549 3140

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 the 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.

This manual applies in respect of each constituent private body that is a member of the Raubex Group as set out in Annexure A. The information officer named below is appointed in respect of the Raubex Group and its subsidiaries.

<i>Date</i>	<i>Version</i>	<i>Description</i>	<i>Author</i>
April 2014	1	Promotion of access to Information Act: Manual	Information Officer
April 2017	2	Promotion of access to Information Act: Manual	Information Officer

2. Availability of this manual

A copy of this manual is available on our website (www.raubex.com) or by sending a request for a copy to the Information Officer by e-mail. The manual may also be inspected at the address set out above. In addition, this manual can be accessed through the SAHRC at its address set out above in paragraph 1. This manual will be updated from time to time, as and when required.

3. The Act and Section 10 Guide [Section 51(1)(b)]

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.

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 4 and 5 of this Manual.

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
Email:	:	paia@sahrc.org.za

4. Form of Request [Section 51(1)(e)]

To facilitate the processing of your request, kindly:

- Use the prescribed Form C which is attached hereto as Annexure B and also available on the website of the South African Human Rights Commission at www.sahrc.org.za
- Address your request to our Information Officer at the address, fax number or electronic mail address provided above in paragraph 1.
- Provide sufficient details to enable the company to identify:
 - The record(s) requested;
 - The requester (if an agent is lodging the request, proof of capacity);
 - The form of access required;
 - The postal address or fax number of the requester in the Republic of South Africa;
 - If the requester wishes to be informed of the decision in any manner (in addition to written) such manner and particulars thereof;
 - 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.

5. Prescribed fees [Section 51(1)(f)]

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

- A requester is required to pay the prescribed fees as per Annexure C before a request will be processed;
- 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;
- A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- Records may be withheld until the fees have been paid;
- The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za

Note that all requests to Raubex Group or any of its subsidiaries that constitutes a private body, will be evaluated and considered in accordance with the Act. Publication of this manual and describing the categories and subject matter of information held by the Raubex Group does not give rise to any rights, in contract or otherwise, to access such information or records except in terms of the Act.

6. Voluntary disclosure (Latest notice in terms of Section 52(2)) [Section 51(1)(c)]

Notices in terms of Section 52 are voluntary, yet the Raubex Group does make certain information freely available at www.raubex.com without request. The website contains various categories of information relating to the Group, such as structure of the Raubex Group as well as details of subsidiaries, financial results and reports, current projects, career information, news items and contact details. Promotional brochures relating to specific products and services are also published and distributed from time to time.

7. Records available in terms of any other legislation [Section 51(1)(d)]

Raubex Group is subject to all laws of the Republic of South Africa. The list of Acts shown below may not be exhaustive; accordingly, Raubex Group may be subjected to further Acts; alternatively, there may be Acts listed which are not applicable to Raubex Group. :

Companies Act 71 of 2008
 Income Tax Act 58 of 1962
 Value Added Tax Act 89 of 1991
 Labour Relations Act 66 of 1995
 Basic Conditions of Employment Act 75 of 1997
 Employment Equity Act 55 of 1998
 Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
 Competition Act 89 of 1998
 Credit Agreement Act 75 of 1980
 Financial Markets Control Act 55 of 1989
 Insider Trading Act 135 of 1998
 Occupational Health and Safety Act 85 of 1993

Harmful Business Practices Act 23 of 1999
Protection of Businesses Act 99 of 1978
Prescription Act 68 of 1969
Skills Development Act 97 of 1998
Stamp Duties Act 77 of 1968
Skills Development Levies Act 9 of 1999
Transfer Duty Act 40 of 1949
Unemployment Insurance Act 63 of 2001
Unemployment Contributions Act 4 of 2002
National Environmental Management Act 107 of 1998
Stock Exchange Control Act 1 of 1985 and the rules and listings requirements of the JSE
Securities Exchange authorised in terms thereof

8. Records held by the Raubex Group

Raubex Group maintains records on the categories and subject matters listed below. 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 provision of the Act. Please note further that many of the records held by us are those of third parties, such as customers and employees and we take the protection of third parties' confidential information very seriously, and will not divulge such information without their written consent. Please ensure that requests for such records are carefully motivated to avoid rejection.

8.1 Internal records

The following are records pertaining to the Raubex Group own affairs and those of its constituent companies:

- Memorandum of Incorporation;
- Financial records;
- Operational records;
- Intellectual property;
- Marketing records;
- Internal correspondence;
- Product records;
- Statutory records;
- Internal policies and procedures;
- Minutes of meetings;
- Charters, codes of conduct and policies (both internal and external) to which the Raubex Group subscribes; and
- Records held by officials of the Raubex Group.

8.2 Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the Raubex Group and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the Raubex Group. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers. Personnel records include the following:

- Any personal records provided to us by our personnel;
- Any records a third party has provided to us about any of our/their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Employment policies and procedures;
- Internal evaluation records; and
- Other internal records and correspondence

8.3 Customer-related records

Customer-related information includes the following:

- Contracts with the customer and between the customer and other persons;
- Any records a customer has provided to the Raubex Group or a third party acting for or on behalf of the Raubex Group (including plans, specifications, approvals, licences, reports, intellectual property rights and the like);
- Any credit records or other research conducted by the Raubex Group in respect of its customers or research derived by the Raubex Group from its customers and their activities;
- Records, reports, designs and the like generated by the Raubex Group for its customers;
- Any records a third party has provided to the Raubex Group either directly or indirectly; and
- Records generated by or within the Raubex Group pertaining to the customer, including transactional records.

8.4 Other Parties

Records are kept in respect of other parties, including without limitation joint ventures and consortia to which the Raubex Group is a party, contractors and sub-contractors, suppliers, subsidiary/holding/sister companies, service providers, and general market conditions. In addition, such other parties may possess records which can be said to belong to the Raubex Group. The following records fall under this category:

- Personnel, customer, or Raubex Group records which are held by another party as opposed to being held by the Raubex Group; and
- Records held by the Raubex Group pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.

8.5 Other records

Further records are held including:

- Information relating to the Raubex Group's own commercial activities;
- Procurement and administration for the Raubex Group; and
- Research information belonging to the Raubex Group or carried out on behalf of a third party.

Annexure A

	Name of Company	Registration Number
1	Raubex Group Limited	2006/023666/06
2	Raubex (Pty) Ltd	1978/004596/07
3	Akasia Road Surfacing (Pty) Ltd	1996/010877/07
4	Aliwal Dolorietgroewe (Pty) Ltd	1976/003159/07
5	Alfa Sandworks (Pty) Ltd	2015/237480/07
6	B and E International (Foreign) (Pty) Ltd	2010/011209/07
7	B and E International (Pty) Ltd	1982/010924/07
8	Burma Plant Hire (Pty) Ltd	2003/008891/07
9	Burma Plant Hire and Mining (Pty) Ltd	2010/007222/07
10	Canyon Rock (Pty) Ltd	2000/027136/07
11	Centremark Roadmarking (Pty) Ltd	2001/027113/07
12	Comar Plant Design and Manufacturing (Pty) Ltd	2012/180733/07
13	Cradock Quarry (Pty) Ltd	2015/218660/07
14	Crushco (Pty) Ltd	2015/045720/07
15	Delmas Quarry (Pty) Ltd	2015/219178/07
16	Empa Plant (Pty) Ltd	2014/278536/07
17	Empa Structures (Pty) Ltd	2015/023522/07
18	Forward Infra (Pty) Ltd	1984/000025/07
19	Greenmined Environmental (Pty) Ltd	2012/055565/07
20	Harding Quarry (Pty) Ltd	1962/005083/07
21	Inzalo Crushing and Aggregates (Pty) Ltd	2008/008952/07
22	K2015227390 (SA) (Pty) Ltd	2015/227390/07
23	K2015227410 (SA) (Pty) Ltd	2015/227410/07
24	K2015227425 (SA) (Pty) Ltd	2015/227425/07
25	K2015227448 (SA) (Pty) Ltd	2015/227448/07
26	L and R Civil (Pty) Ltd	2007/011169/07
27	Matlosana Industries (Pty) Ltd	2006/020438/07
28	Milling Techniks (Pty) Ltd	1999/016688/07
29	Middelburg Quarry (Pty) Ltd	1976/002100/07
30	Mpipho Plant Hire (Pty) Ltd	2012/191931/07
31	Muscle Construction (Pty) Ltd	1998/012494/07
32	National Asphalt (Pty) Ltd	1997/014970/07
33	Ndlu Housing (Pty) Ltd	2015/026278/07
34	OMV (Pty) Ltd	2014/011295/07
35	OMV Kimberley (Pty) Ltd	2013/158927/07
36	OMV Kimberley Mining (Pty) Ltd	2015/219117/07
37	OMV Stilfontein (Pty) Ltd	2014/022006/07

38	Petra Quarry (Pty) Ltd	2000/011023/07
39	Phambili Road Surfacing (Pty) Ltd	1999/017235/07
40	Phuhlisa Development Solutions (Pty) Ltd	2002/029574/07
41	Queenstown Quarry (Pty) Ltd	1996/006053/07
42	Raubex Building (Pty) Ltd	1976/003683/07
43	Raubex Civil (Pty) Ltd	1984/000024/07
44	Raubex Construction (Pty) Ltd	1993/080002/07
45	Raubex Infra (Pty) Ltd	2002/019269/07
46	Raubex KZN (Pty) Ltd	1970/007930/07
47	Raubex Renovo (Pty) Ltd	2015/224827/07
48	Raudev (Pty) Ltd	2007/024392/07
49	Raumix Aggregates (Pty) Ltd	1999/013981/07
50	Raumix Holdings (Pty) Ltd	1982/008336/07
51	Roadmac (Pty) Ltd	1997/000224/07
52	Roadmac Surfacing (Pty) Ltd	1992/001299/07
53	Roadmac Surfacing Cape (Pty) Ltd	2001/018597/07
54	Roadmac Surfacing KZN (Pty) Ltd	2002/008071/07
55	Saldanha Plant Hire (Pty) Ltd	1987/004633/07
56	Shisalanga Construction (Pty) Ltd	1998/007366/07
57	SPH Earthmoving (Pty) Ltd	1997/022022/07
58	SPH Equipment Hire (Pty) Ltd	1999/028696/07
59	SPH Group (Pty) Ltd	1970/006295/07
60	SPH Group Properties (Pty) Ltd	1997/016023/07
61	SPH Kundalila (Pty) Ltd	1997/015857/07
62	SPH Mining (Pty) Ltd	2015/218760/07
63	SPH Sand (Pty) Ltd	1997/019374/07
64	Stata Civils (Pty) Ltd	1999/004321/07
65	Stabilpave (Pty) Ltd	1984/002268/07
66	Tosas (Pty) Ltd	1971/011973/07
67	Tosas Beherend (Pty) Ltd	1971/011965/07
68	Tosas Eastern Cape	2014/133399/07
69	Turnkey Real Estate Company (Pty) Ltd	2014/046159/07
70	Verlesha (Pty) Ltd	2015/040615/07
71	Willow Quarries (Pty) Ltd	1991/000372/07
72	Zamori Construction (Pty) Ltd	2003/029893/07
73	Zisena (Pty) Ltd	1981/003254/07