PAIA MANUAL

OF

ALLIED ELECTRONICS CORPORATION LIMITED

("ALTRON")

Registration number 1947/024583/06

in terms of

Section 51 of

The Promotion of Access to Information Act No. 2 of 2000

as amended ("the Act")

Updated: June, 2016

THE PURPOSE

The purpose of this document is to serve as the Manual for the Altron group as required in terms of the Act, and to provide a reference as to the records held and the procedures that need to be followed to request access to such records.

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1. Introduction

Allied Electronics Corporation Limited (Altron) through its principal subsidiaries, Allied Technologies (Pty) Ltd, ("Altech"), Bytes Technology Group (Pty) Ltd, ("Bytes") and Power Technologies (Pty) Ltd, ("Powertech") is invested in the telecommunications, multi-media, information technology and power electronics industries.

Altech, Bytes and Powertech are each wholly owned subsidiaries of Altron, and will be referred to collectively as "sub-holdings". For purposes of this Manual Altron, Altech, Bytes and Powertech their subsidiaries and divisions will individually and collectively be referred to as "the Group". Generally, our businesses can be grouped into two areas: technology, multimedia and information technology (Altron TMT) and power electronics with a significant manufacturing element (Altron Power). Accordingly, the active operating subsidiaries and divisions covered by this Manual are:

1.1 Altron

Operating subsidiaries and/or divisions	Registration number
Allied Electronics Corporation Limited	1947/024583/06
Altron Finance Proprietary Limited	1969/014983/07
Altron Management Services Proprietary Limited	1971/013786/07

1.2 Altron TMT (Altech & Bytes)

Operating subsidiaries and/or divisions	Registration number
Altron TMT Holdings Proprietary Limited (Formerly Allied Technologies Limited)	1946/020415/07
Altron TMT SA Group Proprietary Limited (Formerly Bytes Technology Group South Africa (Pty) Ltd)	2003/027603/07
Altron TMT Proprietary Limited	1984/003805/07
Altron Management Services, a division of Altron TMT Proprietary Limited	
Altron Group Services, a division of Altron TMT Proprietary Limited	
Altech Netstar International, a division of Altron TMT proprietary Limited	
Bytes Universal Systems, a division of Altron TMT Proprietary Limited	
Bytes Document Solutions, a division of Altron TMT Proprietary Limited	
Bytes Managed Solutions, a division of Altron TMT Proprietary Limited	
Bytes People Solutions, a division of Altron TMT Proprietary Limited	
Bytes Systems Integration, a division of Altron TMT Proprietary Limited	
Bytes Secure Transactions (division)	
Altech Card Solutions, an operation within Bytes Secure Transaction Solutions, a division of Altron TMT proprietary Limited	
Altech Nupay, an operation within Bytes Secure Transaction Solutions, a division of Altron TMT proprietary Limited	
Delter IT Services, an operation within Bytes Secure Transaction Solutions, a division of Altron TMT proprietary Limited	
Med-E-Mass, an operation within Bytes Secure Transaction Solutions, a division of Altron TMT proprietary Limited	
Mediswitch, an operation within Bytes Secure Transaction Solutions, a division of Altron TMT proprietary Limited	
Autopage Holdings Proprietary Limited	1987/001071/07
Stream Broadband Communications Proprietary Limited	2003/001169/07

Operating subsidiaries and/or divisions	Registration number
Altech Netstar Group Proprietary Limited	2010/009067/07
Altech Netstar Proprietary Limited	1992/001223/07
Altech Netstar Traffic Proprietary Limited	2007/022788/07
Autopage (Cape) Proprietary Limited	1983/005492/07
Altech Radio Holdings Proprietary Limited	2009/020638/07
Altech Alcom Matomo, a division of Altech Radio Holdings Proprietary Limited	
Altech Alcom Radio Distributors, a division of Altech Radio Holdings Proprietary Limited	
Altech Fleetcall, a division of Altech Radio Holdings Proprietary Limited	
Arrow Altech Holdings Proprietary Limited	1997/000402/07
Arrow Altech Distribution Proprietary Limited	1997/000401/07
Erf 211 Hughes Proprietary Limited	1991/001362/07
Bytes Technology Group Proprietary Limited	1911/003874/07
Altech Multimedia Proprietary Limited	1988/001568/07
Altech Data Proprietary Limited	1969/007405/07
Altech One Nominees Proprietary Limited	1979/004483/07
Altech UEC Properties Proprietary Limited	1976/003326/07
Bytes Healthcare Solutions Proprietary Limited	1999/013750/07

1.3 Altron Power (Powertech)

Operating subsidiaries and/or divisions	Registration number
Power Technologies Proprietary Limited	1946/022346/07
Aberdare Cables Proprietary Limited	1946/022805/07
Powertech System Integrators Proprietary Limited	2007/015049/07
Powertech QuadPro SA Proprietary Limited	2012/172462/07
Powertech Properties and Investments Proprietary Limited	1938/010620/07
Powertech Transformers Proprietary Limited	1951/000234/07
Power - Pretoria West, a division of Powertech Transformers Proprietary Limited	
Distribution – Cape Town, a division of Powertech Transformers Proprietary Limited	
Powertech Calidus Proprietary Limited	1962/000978/07
Powertech Insulation, a division of Powertech Calidus Proprietary Limited	
Southern Cross Investments Proprietary Limited	1959/001114/07
Powertech Industries Proprietary Limited	1964/007250/07
Powertech Management Services, a division of Powertech Industries Proprietary Limited	
Crabtree Electrical Accessories SA, a division of Powertech Industries Proprietary Limited	
Powertech Batteries/Willard Batteries, a division of Powertech Industries Proprietary Limited	
Webroy Proprietary Limited	1979/004254/07
Powertech Switchgear, a division of Powertech Industries Proprietary Limited	
Power Technologies International Holdings Proprietary Limited	1953/001276/07
Aberdare Cables International Holdings Proprietary Limited	1976/001581/07
Powertech Batteries International Holdings Proprietary Limited	1981/006948/07
Erf 234 Wadeville Proprietary Limited	1966/010857/07

Operating subsidiaries and/or divisions	Registration number
Erf 2619 Korsten Proprietary Limited	1973/010412/07
Erf 2620 Korsten Proprietary Limited	1934/005687/07
IST Holdings Proprietary Limited	2003/030608/07
Powertech Telecom Cables Proprietary Limited	2016/067327/07

2. Company contact details: Section 51(1)(a)

The Chief Executive ("CE") of Altron as well as the CEO's of the sub-holdings have duly authorised the contact person below to ensure that the Act is complied with *vis-a-vis* the Group:

Contact Person	Dr PW van der Walt
Designation	Chief Information Officer
Physical Address	Altron House 4 Sherborne Road Parktown, 2193 Johannesburg
Postal Address	P O Box 981 Houghton 2041 SOUTH AFRICA
Telephone	+27 11 645 3600
Fax	+27 11 482 6489
E-mail address	pvdwalt@altron.com
Website address	www.altron.com

Where relevant, assistance will be provided by the Deputy Information Officers as appointed by the Chief Information Officer, within each of the sub-holdings.

3. The Act: 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 6 and 7 of the Act

Requesters are referred to the Guide in terms of Section 10 of the Act which has been compiled by the South African Human Rights Commission (SAHRC), which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC or at their website - http://www.sahrc.org.za/.

The contact details of the SAHRC are:

Physical Address	The Human Rights Commission 29 Princess of Wales Terrace cnr York and St. Andrews Street Parktown
Postal Address	Private Bag 2700 Houghton
Telephone	+27 11 877 3600
Fax	+27 11 403 0625
Website address	www.sahrc.org.za

4. Applicable Legislation: Section 51(1)(c)

Records are available in accordance with the following current South African legislation and any amendments thereof (only to the extent that the relevant Act is applicable and makes disclosure of records compulsory):

No	Reference	Act
1	No. 75 of 1997	Basic Conditions of Employment Act
2	No. 71 of 2008	Companies Act
3	No. 130 of 1993	Compensation for Occupational Injuries and Diseases Act
4	No. 89 of 1998	Competition Act
5	No. 68 of 2008	Consumer Protection Act
6	No. 25 of 2002	Electronic Communications and Transactions Act
7	No. 55 of 1998	Employment Equity Act
8	No. 38 of 2001	Financial Intelligence Centre Act
9	No. 15 of 1973	Hazardous Substances Act
10	No. 58 of 1962	Income Tax Act
11	No. 66 of 1995	Labour Relations Act
12	No. 131 of 1998	Medical Schemes Act
13	No. 34 of 2005	National Credit Act
14	No. 107 of 1998	National Environment Management Act
15	No. 39 of 2004.	National Environmental Management: Air Quality Act
16	No. 59 of 2008	National Environmental Management: Waste Act
17	No. 61 of 2003	National Health Act
18	No. 36 of 1998	National Water Act
19	No. 85 of 1993	Occupational Health and Safety Act
20	No. 24 of 1956	Pension Funds Act
21	No. 68 of 1969	Prescription Act
22	No. 2 of 2000	Promotion of Access to Information Act
23	No. 26 of 2000	Protected Disclosures Act
24	No. 70 of 2002	Regulation of Interception of Communications and Provision of Communication – Related Information Act
25	No. 36 of 2004	Securities Services Act
26	No. 97 of 1998	Skills Development Act
27	No. 9 of 1999	Skills Development Levies Act
29	No. 4 of 2002	Unemployment Insurance Contributions Act
28	No. 89 of 1991	Value Added Tax Act

5. Schedule of Records available: Section 51(1)(d)

The following categories of records are automatically available without a person having to request access in terms of this Act:

Category	Records
Listed company records available for inspection	*Share register* Monthly download from STRATE. *Dividend register* Annual register as supplied by the transfer secretaries *Financial statements* Integrated annual report Interim report and results Annual financial results announcement Trading statements and business updates published (including where appropriate profit forecasts) *JSE news (SENS)* Appointments/resignation of directors Share dealings of directors Dividend declarations *Announcements* Rights offers Mergers and acquisitions Share placing Claw-back offers Schemes of arrangement Prelisting statements *Corporate transactions* Circulars to shareholders Notices of general meetings *Shareholders' meeting minutes (For shareholders only)* Special and general meetings of the company Annual general meeting of the company
Auditors	The company's current auditors are: KPMG 1 Empire Crescent Parktown, 2193 SOUTH AFRICA

The Group has in its possession the following categories of records on the subject matters referred to hereunder:

Category	Records
Accounting	The Accounting department maintains financial and management accounts for the Group and provides back-office activities that support Integrated Treasury and Cash Management. Corporate Account records comprise the following main categories: • Accounting Records • Consolidation Records • General Correspondence • Internal Reports and Communications • Investment Records • Management Reports • PAYE Records • Tax Records • Transactional Records • Treasury Dealing and Settlement Records • VAT Records
Chief Executive's office	The Chief Executive's office records comprise the following main categories: • Administration Records • Financial Reports • Internal Reports and Communications • Research Records • Sponsorship Records • Statutory Records

Category	Records
Company investments	List of subsidiary companies, associates and joint ventures
Company Secretary	The Company Secretary provides company secretarial services to the Group. Company Secretary records comprise of the following main categories: • Relevant Contracts and Agreements • General Correspondence • Intellectual Property Rights Records (Trademarks, Patents, Registered Designs and Copyright) • Internal Reports and Communications • Investment Records • Minute Books • Share Registration Records • Statutory Records • Long-term share based incentive schemes. • Copies of the relevant trust deeds and rules.
Corporate Communications	The Corporate Communications team provide communications and marketing services to the Group. Corporate Communications records consist of the following main categories: • Analyst presentations • Corporate mission statement • Corporate video • Memos from the Chairman • Press releases • Staff magazine
Corporate Finance	The Corporate Finance department provides specialist financial services to the Group. Corporate Finance records comprise the following main categories: • Departmental Administration Records • Internal Reports and Communications • Quoted Company Records • Technical Publications • Technical Records
Group Tax	Group Tax provides advice to the Group on all aspects of taxation. Group Tax records comprise the following main categories: • Administrative Records • Corporate, Subject and Country Records • Internal Reports and Communications • Tax Records
Human Resource (HR) Department	The Human Resource department's primary objective is to develop and implement a competitive human resource strategy that will support the Group. Human Resource records comprise the following main categories: • Relevant Contracts • Employee benefit Records • Employee Records • Employment Equity Records • Employment Equity returns to the Department of Labour • General Correspondence • General HR Policies and Procedures • Labour Relations Records • Pension Records • Standard Terms and Conditions of Employment applicable to all Staff • Statutory Records • Training Records • Work skills development plan submitted to the Finance and Accounting Services Sector Education and Training Authority (FASSET)
Internal Audit	Internal Audit's purpose is to provide the Corporate Offices and Operations held through the Group with independent assurance that risks are being appropriately managed across the Group. Internal Audit records comprise the following main categories: • Audit Reports and Supporting Working Papers • General Administration Records • General Correspondence • Group Audit Practice Records • Risk Management Records
IT Governance Committee	The IT Governance Committee is responsible for developing, supporting and providing assurance on the implementation of IT policies, standards and best practice in the Group. IT governance committee records comprise the following main categories: • General Correspondence • Group wide Contracts and Agreements • Policy Records
Legal Department	The Legal department provides assistance with all corporate legal matters material to the Group. Legal department records comprise the following main categories: • Copies of Agreements • General Correspondence • Immovable Property Records • Internal Reports and Communications • Legal Records • Litigation Records

Category	Records
	• Statutory Records • Working Files
Medical and Occupational Health Service	Certain Group companies provide general clinic services to their employees. Medical records comprise the following main categories: • Accounting Records • Clinic Policies • Relevant Contracts and Agreements • Employee Records • General Correspondence • Medical Policies • Medical Records • Medical Reference material • Minutes of Meetings

6. Form of request: Section 51 (1)(e)

To facilitate the processing of your request, kindly:

6.1 Use the prescribed form (Form C – when a request is made to a private body or business), available on the website of the South African Human Rights Commission (SAHRC) at www.sahrc.org.za

6.2 Address your request to the Head of the Company (Chief 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;
   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;
d) 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.

Any request for access to records should be submitted on the prescribed form C (a copy of which is attached) which should be sent to the CIO whose name and address details appear in paragraph 2 hereof.

7. Prescribed fees: Section 51 (1)(f)

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

7.1 A requestor 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 requestor 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 (SAHRC) at www.sahrc.org.za

Please note that the correct completion and submission of a Request for Access form does not automatically entitle or allow the applicant access to the requested record. An application for access

to a record is subject to certain limitations if the requested record falls within a category as specified in Part 3 Chapter 4 of the Act.

Please further note that if it is reasonably suspected that an applicant has obtained access to a record on the basis of the submission of materially incorrect, false or misleading information, legal proceedings may be instituted against such applicant.

In the event that a request for access is successful an access fee will be payable for the search, reproduction and/or preparation of records and will be calculated based on the fee prescribed under the Act, an extract of the details of which is attached at the end of this manual.

7.1 Completion of Request for Access Form

All applicants should take note of the following guidelines when completing the attached Request for Access to Record of a Private Body (Form C):

(i) The form must be completed by filling in all lines and spaces
(ii) Proof of the identity, in the form of a copy of the applicant's identity document, is required to be submitted with the application
(iii) If the applicant is a body corporate, the authority of the person submitting the application on behalf of such body corporate must be proven on the basis of a written authority to be attached
(iv) Type or print in a clear eligible manner, if a question does not apply indicate so by inserting "N/A" in response to that question, and if there is nothing to disclose in response to a particular question write "NIL" in response thereto
(v) If there is insufficient space in the form, add additional folios on which the additional information is provided, clearly indicating to which question this relates.

Request for information will be evaluated and the applicant will be notified within 30 days after receipt of the request in the prescribed format of the following:

7.2 Notification of extension period (if required)

Applicants must take note that in terms of the Act, the 30 days period mentioned above may be extended for a further period of not more than 30 days under certain circumstances (details will be provided together with the notification of such extension);

7.3 The access fee and/or deposit

The applicant will be informed of the access fee or deposit (if any) which is payable for having access to the records and for the search, reproduction and/or preparation work involved, the account details and of the methods in which payment may be made. In addition, a deposit may be requested which is fully refundable in the event that the application is ultimately refused.

7.4 Decision on request

The applicant will be informed whether or not the application for access has been denied, or granted. In the event that the application is refused, the applicant will be given adequate reasons for the refusal and will be informed that the applicant may lodge an application with a Court against the refusal of the application, as well as the procedure (including the period) for lodging such application.

7.5 Grounds for refusal

The Group may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Group may refuse include:

- Protecting personal information that the Group hold about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;

- Protecting commercial information that the Group holds about a third party or the Group (for example trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of the Group or the third party);
- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;
- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Group;
- Disclosure of the record would put the Group at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- The record is a computer programme; and/or
- The record contains information about research being carried out or about to be carried out on behalf of a third party of the Group.

7.6 Records that cannot be found or do not exist

If the Group has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try and locate the record.

8. Third party information

If access is requested to a record that contains information about a third party, the Group is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

In the event of the third party furnishing reasons for the support or denial of access, our designated CIO will consider these reasons in determining whether access should be granted, or not.

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

(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 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:	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 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 audio cassette		transcription of soundtrack* 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