



INFORMATION MANUAL

**PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF
ACCESS TO INFORMATION ACT, NO. 2 OF 2000**

["THE ACT"]

FOR

STEP HOLDINGS



INDEX

1. Introduction
2. Company Contact Details (Section 51 (1) (a))
3. The ACT and Section 10 Guide (Section 51(1) (b))
4. Applicable Legislation (Section 51 (1) (c))
5. Schedule of Records (Section 51 (1) (d))
6. Form of Request (Section 51 (1) (e))
7. Prescribed Fees (Section 51 (1) (f))
8. Prescribed Form C



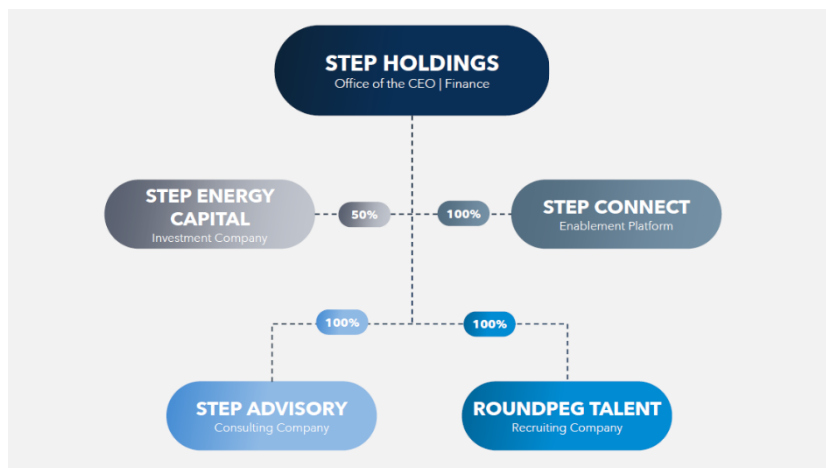
1. INTRODUCTION

Step Holdings (Pty) Ltd. consists of multiple businesses including:

- Step Advisory: A management consulting firm of strategic growth advisors.
- Roundpeg Talent: A boutique recruitment agency.
- Step Connect: An administrative and facilities management business.
- Step Energy Capital: A solar energy investment business.

Step Holdings comprises a number of companies. The provisions of this Information Manual shall apply to each company.

Organogram:



2. COMPANY CONTACT DETAILS

The responsibility for administration of, and compliance with, PAIA and POPIA have been delegated to the Information Officer. Requests pursuant to the provisions of PAIA and/or POPIA should be directed to the Information Officer as follows:

Information Officer: Graham Geldenhuys

Street Address: 42 Wierda Road West

Wierda Valley

Sandton

Johannesburg

2196

Postal Address: As above

Telephone: +27 11 215 8360

Email Address: popia@stepadvisory.com

Website: www.stepadvisory.com

www.roundpegtalent.com



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 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

No.	ACT
1	Basic Conditions Of Employment Act, 1997 (Act No. 75 Of 1997)
2	Broad-Based Black Economic Empowerment Act, 2003 (Act No. 53 Of 2003)
3	Employment Services Act, 2014 (Act No. 4 of 2014)
4	Companies Act 2008 (Act No. 71 Of 2008)
5	Electronic Communications And Transactions Act, 2002 (Act No. 25 Of 2002)
6	Employment Equity Act, 1998 (Act No. 55 Of 1998)
7	Income Tax Act, 1962 (Act No. 58 Of 1962)
8	King Code Of Governance For South Africa, 2009 (King IV)
9	Labour Relations Act, 1995 (Act No. 66 Of 1995)
10	Skills Development Act, 1998 (Act No. 97 Of 1988)
11	Skills Development Levies Act, 1999 (Act No. 9 Of 1999)
12	Value Added Tax Act, 1991 (Act No. 89 Of 1991)
13	Compensation For Occupational Injuries And Diseases Act, 1993 (Act No. 130 Of 1993)
14	Copyright Act 98 Of 1978
15	Promotion Of Access To Information Act, 2000 (Act No. 2 Of 2000)
16	Occupational Health And Safety Act, 1993
17	Unemployment Insurance Act, 2001 (Act No. 63 Of 2001)



18	Unemployment Insurance Contributions Act, 2002 (Act No. 4 Of 2002)
19	Constitution Of The Republic Of South Africa Act 108 Of 1996
20	Protection of Personal Information Act 4 of 2013 (POPIA)
21	Employment Tax Incentive Act, 2013
22	Securities Transfer Tax Act, 2007
23	Tax Administration Act, 2011

5. SCHEDULE OF RECORDS

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 provisions of the Act.

<u>Records</u>	<u>Subject</u>
Public Affairs	<ul style="list-style-type: none"> • Public Product Information
Financial	<ul style="list-style-type: none"> • Annual Financial Statements • Financial and Tax Records (Company & Employees) • Management Accounts
Marketing	<ul style="list-style-type: none"> • Market Information • Public Customer Information: <ul style="list-style-type: none"> ◦ Service Brochures • Performance Records • Marketing Strategies • Customer Database • Anonymous User Behaviour
Human Resources	<ul style="list-style-type: none"> • Policies on staff recruitment and other staff related policies • Employment contracts • Details of employees and benefits
Recruitment Database	<ul style="list-style-type: none"> • Client Contact Information • Candidate CVs (Contact Information, Employment History, Educational History, Competencies)

6. FORM OF REQUEST

To facilitate the processing of your request, kindly:

- Use the prescribed Form C, available below or on the website of the South African Human Rights Commission at www.sahrc.org.za.
- Address your request to the Information Officer.
- Provide sufficient details to enable Step Holdings 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

In line with the recommended guidelines of the Promotion of Personal Act, the following applies to requests (other than personal requests):

- A requestor is required to pay the prescribed fees (R50.00) 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 1/3 of R50, which would be payable if the request were granted);
- A requestor 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 actual postage is payable when a copy of a record must be posted to a requester.
- The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.
- 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.
- The fees for reproduction referred to in regulation 11(1) are follows:

a) For every photocopy of an A4-size page or part thereof	R1,10
b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
c) For a copy in a computer-readable form on a flash drive or CD	R70,00
d) For a transcription of visual images for an A4 size page or part thereof	R40,00
e) For a copy of visual images	R60,00
f) For a transcription of an audio record for an A4 size page or part thereof	R20,00
g) For a copy of an audio record	R30,00
h) 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	
i) Postage fee	



8. PRESCRIBED FORM C

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 <i>ONLY</i> if a request for information is made on behalf of another person.
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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 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*
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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
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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* (flash drive or compact disc)
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'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
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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 of20

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE