


<p>Group Policy Copyright PPC Ltd.</p>	<p>Number: Policy GPGOV1.13 Revision: V1.0, effective from 18 June 2020 Owner: Kristell Holtzhausen – Group Company Secretary Approved by: EXCO and SETCO</p>	
<p>Title: POLICY ON ACCESS TO INFORMATION IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO 2 OF 2000</p>		

1. Purpose

It is PPC Limited's policy to conduct its operations in compliance with all legal and regulatory requirements. This Access to Information Manual ("**the Manual**") regulates access to information and records owned, held by or otherwise under the control of PPC Limited and its South African subsidiaries ("**PPC or the Group**") and the release of any such information or records by any of PPC Limited's directors, officers, employees, agents or anyone acting on its behalf. **Application**

This Manual applies to information and records owned, held by or otherwise under the control of PPC and the release of any such information or records.

2. Objective

The objectives of this Manual **attached as Annexure A** are to:

- provide a non-exhaustive list of information, records and other details held by PPC;
- set out the requirements on how to request information in terms of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA" and/or "the Act") and the Protection of Personal Information Act, Act No 4 of 2013 ("PoPI") as well as the grounds on which a request may be refused; and
- define the manner and form in which a request for information must be submitted.

3. Confidentiality

PPC's business information is a valuable asset, thus cognisance should be taken of upholding confidentiality at all times. Where it's suspected that confidentiality may be infringed in respect of information that is not in the public domain, such information requests should be referred to the relevant departmental heads to scrutinize validity thereof for business purposes.

The relevant departmental head may consequently, reject, accept the information request or approve it subject to conclusion of an NDA with the requesting party

4. Compliance

Non-compliance with this Group Policy will result in disciplinary action in accordance with the PPC Code of Conduct. The policy owner must take effective and appropriate disciplinary steps against any employee who omits to act in accordance with this policy. The policy owner is accountable for maintaining the correctness of the policy. Any aspects of this policy which may be unclear should be communicated through the normal management channels. Should this policy conflict with any current business practices, the policy owner should be contacted for clarity and / or guidance.

5. Frequency of review and update

The policy owner is accountable for maintaining the correctness of the policy. Any aspects of this policy which may be unclear should be communicated through the normal management channels. Should this policy conflict with any current business practices, the policy owner should be contacted for clarity and / or guidance. Policy owners must make routine changes to an existing policy document, as and when changes in laws, standards or business requirements take effect. Group Legal & Compliance will prompt all Group Policy Owners to review and sign-off all Group Policies on an annual basis.

6. Reference to related Group Policies

Policy on policies

7. Signature and date of approval

Recommended by the Group Policy Owner:

Kristell Holtzhausen	Signature:
Group Company Secretary	Date:

Approved by the Group CEO:

Roland van Wijnen	Signature:
Group CEO	Date:

Approved by the Chairman of the Social, Ethics and Transformation committee:

Nonkululeko Gobodo	Signature:
Chairman of the Social, Ethics and Transformation Committee	Date:

Approved by the Chairman of the Board:

Approved as per minutes of the Board of Directors meeting June 18, 2020

PAIA Manual for PPC Limited

PART I

[Information required under section 51 (1) (a) Act]

Body:	PPC Ltd ("PPC" or "the Company")
Chief Executive Officer:	Roland van Wijnen
Information Officer:	Kristell Holtzhausen
Postal address:	P.O. Box 787416, Sandton, 2146
Street address:	148 Katherine Street, Sandton
Telephone number:	+27 (0)11 386 9000
Fax number:	+27 (0)11 386 9001
Contact person:	Mr A Pillay
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Email address:	Anashrin.Pillay@ppc.co.za

Introduction

PPC Ltd is a public company listed on the Johannesburg Securities Exchange in the Construction and Building Materials sector.

Part II

[Information required under section 51 (1) (b) of the Act]

Guide in terms of section 10 Act 20 of 2000

PPC is required here to give a description of a guide the Human Rights Commission must publish and how to gain access to it. This manual is intended to inform the public on how to exercise their rights under the Act. A Guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission.

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 offices of the Human Rights Commission at 29 Princess of Wales Terrace, cnr York and St. Andrews Street, Parktown and on its website at <http://www.sahrc.org.za/>

Part III

[Copy of notice, if any, required under section 51 (1) (c) of the Act]

The following categories of records will be freely available:

Annual Reports

Marketing and promotional material published by PPC

All information published on the PPC Websites and <https://ppc.africa/corporate/>

Part IV

[Information required under section 51 (1) (d) of the Act]

Records available in terms of any other legislation

PPC keeps records in terms of the following legislation. Unless the legislation states that the general public is allowed access to this information any access must be applied for in terms of the procedures under the Act. Please refer to PART V below:

[Companies Act and Regulations no 71 of 2011](#)

Income Tax Act 58 of 1962

Value Added Tax Act 89 of 1991

Mine Health and Safety Act 29 of 1996

Occupational Health and Safety Act 85 of 1993

Compensation for Occupational Injuries and Diseases Act 130 of 1993

Occupational Diseases in Mines and Works Act 78 of 1973

National Water Act 36 of 1998

National Environmental Management Act 107 1998

Basic Conditions of Employment Act 75 of 1997

Labour Relations Act 66 of 1995

Unemployment Insurance Act 63 of 2001

Regional Services Councils Act 109 of 1985

Stock Exchanges Control Act 1 of 1985

Trademarks Act 194 1993

Pension Funds Act 24 of 1956

Atmospheric Pollution Prevention Act 45 of 1965

Employment Equity Act 55 of 1998

Explosives Act 26 of 1956

Hazardous Substances Act 15 of 1973

Mines and Works Act 27 of 1956

Skills Development Levies Act 9 of 1999

South African Reserve Bank Act 90 of 1989

Part V

[Information required under section 51 (1) (e) of the Act]

Requests for access to information under the Act may be addressed to PPC at the contact details given in PART I above.

Requests for access to information must be made on the forms that have been published in the Government Gazette https://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf. PPC can provide assistance in providing the correct forms.

Every request for access must contain at least the following information:

- the record or records requested; and
- the name and surname of the requester;
- which form of access is required (e.g. personal access, copies of documents, electronic records etc);
- a postal address or fax number of the requester in the Republic;
- the right the requester is seeking to exercise or protect and an explanation of why the requested record is required for the exercise or protection of that right;
- if, in addition to a written reply, the requester wishes to be informed of the decision on the request in any

- other manner, state that manner and the necessary particulars to be so informed; and
- if the request is made on behalf of a person, to submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of PPC.
- Grounds for Refusal of Access to Records
- It must be borne in mind that the Act sets out grounds on which access to information may be refused. These grounds are listed below.
- privacy of third party who is natural person
- commercial information of third party
- confidential information of third party
- safety of individuals, and protection of property
- records privileged from production in legal proceedings
- commercial information of PPC
- research information of third party,
- research information of PPC

There are exceptions to each ground listed here. The procedure in the Act to give access to information is designed to determine the circumstances in which exceptions apply.

Human Resources Records

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

Human resources records include the following:

- Any personal records provided to PPC by their personnel;
- Any records that a third party has provided to PPC about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records;
- Internal policies, standards and procedures;
- Pension and provident fund rules;
- Medical aid scheme rules;
- Remuneration records and
- Other internal records and correspondence.

Customer-related records

A customer includes any natural or juristic entity who purchases products or receives services from PPC. Customer-related information includes the following:

- Any records a customer has provided to a third party acting for or on behalf of PPC;
- Any records a third party has provided to PPC; and
- Records generated by or within PPC pertaining to the customer, including transactional records.

PPC Records

The following are considered to include but not be limited to records, which pertain to PPC's own affairs:

- Financial records
- Internal audit records
- Health, safety and environmental records

- Operational records
- Geological records
- Engineering records
- Purchasing record;
- Contracts
- Property information
- Databases
- Information technology
- Marketing records
- Internal correspondence
- Product records
- Statutory records
- Internal policies and procedures
- Treasury-related records
- Securities and equities
- Records held by officials of PPC.

Other Parties

PPC may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records, which can be said to belong to PPC.

The following records fall under this category:

- Personnel, customer or PPC's records which are held by another party as opposed to being held by PPC; and
- Records held by PPC pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.