



INFORMATION MANUAL

FOR

PIONEER FOODS (PROPRIETARY) LIMITED

*Prepared in accordance with section 51 of the Promotion of Access to Information Act
Act 2 of 2000*

Ref No.: PFG_PAIA_111231

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1. INTERPRETATION

As per the content recorded in this manual, clause headings are for convenience purposes only and shall not be used in its interpretation, unless the context clearly indicates a contrary intention -

- 1.1 Any reference to Pioneer Foods will also include all its wholly owned subsidiaries.
- 1.2 An expression which denotes -
 - 1.2.1 any gender includes the other genders;
 - 1.2.2 a natural person includes an artificial or juristic person and vice versa;
 - 1.2.3 the singular includes the plural and vice versa;
- 1.3 The following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings -
 - 1.3.1 "Act" – the Promotion of Access to Information Act No. 2 of 2000, as amended from time to time including the regulations promulgated in terms of the Act;
 - 1.3.2 "business day" - any day other than a Saturday, Sunday or official public holiday in the Republic of South Africa;

- 1.3.3 "manual" - this manual together with all of its annexures as amended from time to time;
 - 1.3.4 "Head" – the Managing Director of Pioneer Foods;
 - 1.3.5 "Corporate Information Officer" - the person duly authorised and appointed by the Head of Pioneer Foods, to facilitate and assist the Head with any request in terms of the Act;
 - 1.3.6 "Pioneer Foods" – Pioneer Foods (Pty) Ltd (Registration number: 1957/000634/07), a "private body" for purposes of the Act;
- 1.4 Any reference to any statute, regulation and/or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time;
 - 1.5 If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it was a substantive provision in the body of this manual;
 - 1.6 Reference to a party shall include a reference to that party's successors and assigns;
 - 1.7 Reference to a document, includes a reference to an amendment or supplement to or to a replacement or notation of that document;
 - 1.8 Where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this manual;
 - 1.9 Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day;
 - 1.10 Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months or years, as the case may be;
 - 1.11 The use of the word "including" followed by a specific example/s, shall not be construed as limiting the meaning of the general wording preceding it and the *iusdem generis* rule shall not be applied in the interpretation of such general wording or such specific example/s; and
 - 1.12 Insofar as there is a conflict in the interpretation of or application of this manual and the Act, the Act shall prevail.

2. PREAMBLE

The Promotion of Access to Information Act 2 of 2000 ("the Act") came into operation on 23 November 2001. The Act was put in place to actively promote a society in which the people of South Africa have effective access to information, which enables them to fully exercise and protect their rights.

Section 51 of the Act requires that Pioneer Foods, as a private body, compiles a manual giving information to the public regarding the procedure to be followed in requesting information from us for the purpose of exercising or protecting rights.

This manual is intended to fulfil this requirement.

Accordingly, this manual provides a reference to the records that we hold and the process that needs to be adopted, to access such records. All requests for access to information should be addressed to the contact person as identified in section 6 of this manual, as he/she is our duly authorised and designated Corporate Information Officer.

3. COMPANY OVERVIEW

Pioneer Foods was established in 1997 through the merger of Bokomo and Sasko, two long-established companies that built leadership positions in their respective markets in South Africa. Both Bokomo and Sasko were founded as farmers' co-operatives, the former for milling and the latter for selling wheat, but evolved into consumer-orientated organisations with large manufacturing, product and customer bases. These entities were independently converted into companies during 1996.

Operating in the food and beverages business sectors, Pioneer Foods' core business is the production and distribution of a diverse range of food, beverages and related products. Focused on products for both human and animal consumption, Pioneer Foods is a significant player in these industries in southern Africa.

The business operates through its four main divisions –

- *Sasko* manufactures a range of affordable grain-based staple foods. In addition to wheaten and maize products, it also trades in rice, beans, lentils and dried vegetables and has one of South Africa's largest bakery operations with bakeries and depots located throughout the country;
- *Bokomo Foods* produces some of South Africa's best-known breakfast cereals, rusks, biscuits, cake mixes, baking aids, instant mash potato, as well as dried fruit products, nuts, spreads, dehydrated vegetables and processed salads;
- *The Agri Business* produces poultry and animal feeds, chickens, eggs, processed egg and processed chicken-based products;
- *The Ceres Beverage Company* is one of the largest producers of fruit juice, carbonated soft drinks (including *Pepsi*, *7-Up*, *Mirinda* and *Mountain Dew*) and fruit concentrate mixtures as well as the renowned *Lipton Ice Tea*.

4. SCOPE OF THIS MANUAL

We, as a private body, have compiled this manual not only to comply with the provisions of the Act, but also to foster a culture of transparency and accountability in our business environment and to ensure that members of the public have effective access to information in our possession, which will assist them in the exercise and protection of their rights.

Recorded in this manual, you will be able to view the categories of information which our Company holds. You will also be guided with regards to the correct procedure to follow should you require access to any of this information.

The scope of this manual is limited to information held by Pioneer Foods and all its wholly owned subsidiaries.

5. GUIDELINE FOR REQUESTS TO ACCESS INFORMATION

In accordance with Section 10 of the Act, the South African Human Rights Commission (SAHRC) has published a Guide containing information reasonably required by a person wishing to exercise or protect any right in terms of this Act.

This Guide can be obtained from the office of the SAHRC and also appears on their website below:

Enquiries regarding the Guide can be addressed to the South African Human Rights Commission, the contact details of which are as follows:

5.1. Postal Address

The South African Human Rights Commission
Promotion of Access to Information Act Unit
Research and Documentation Department
Private Bag 2700
Houghton
2041
Republic of South Africa

5.2. Telephone Details

- Tel: (011) 484-8300
- Fax: (011) 484-0582

5.3. E-mail Address

- paia@sahrc.org.za

5.4. Website

- www.sahrc.org.za

6. ADMINISTRATION OF THE ACT

The Managing Director (MD) of Pioneer Foods (Pty) Ltd has duly authorized the contact person below to ensure that the requirements of the Act are administered in a fair, objective and unbiased manner. Accordingly, all requests for access to records should be addressed to the Pioneer Foods' Corporate Information Officer.

6.1. Postal Address

The Corporate Information Officer
Pioneer Foods (Pty) Ltd
P.O. Box 20
Huguenot
7645
Republic of South Africa

6.2 Physical Address

The Corporate Information Officer
Pioneer Foods (Pty) Ltd
32 Market Street
Paarl
7646
Republic of South Africa

6.3 Telephone Details

- Tel: (021) 807-5100
- Fax: (021) 807-5290

6.4 E-Mail Address

- info@pioneerfoods.co.za

7. SUBJECTS AND CORRESPONDING CATEGORIES OF RECORDS

To facilitate the easy identification of the records that we hold, we have categorised our records per subject area.

7.1 RECORDS THAT ARE AUTOMATICALLY AVAILABLE IN TERMS OF SECTION 51(1)(c) OF THE ACT

The following records are available without a person having to request access in terms of the Act.

Available on the Pioneer Foods' website

- General information pertaining to Pioneer Foods

Available at the Registrar of Companies

- Statutory Records, such as the Pioneer Foods Group's Annual Financial Statements, the Group's Interim Audited Report, the Memorandum and Articles of Association, etc.

7.2 RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION IN TERMS OF SECTION 51(1)(d)

Records are available in accordance with the following current South African legislation (only to the extent that the relevant Act makes disclosure of records compulsory and only to the extent that it is applicable to our operations) –

- The Companies Act (Act No. 71 of 2008)
- The Stock Exchange Control Act (Act No. 1 of 1985)
- The Occupational Health and Safety Act (Act No. 85 of 1993);
- The Constitution of the Republic of South Africa No.3 of 1994
- The Value-Added Tax Act (Act No. 89 of 1991);
- Income Tax Act (Act No. 58 of 1962);
- Basic Conditions of Employment Act (Act No. 75 of 1997);
- Employment Equity Act (Act No. 55 of 1998);
- Labour Relations Act (Act No. 66 of 1995);
- The Medical Schemes Act (Act No. 131 of 1998);
- The Compensation for Occupational Injuries and Diseases Act (Act No. 130 of 1993);
- The Atmospheric Pollution Prevention Act (Act No. 45 of 1965);
- The Health Act (Act No. 63 of 1977);
- Consumer Affairs (Unfair Business Practices Act), (Act No. 71 of 1988);
- Customs and Excise Amendment Act, Act No. 45 of 1995; and
- South African Revenue Services Act, (Act No. 34 of 1997).

Please note that while we have made every effort to identify all pertinent legislation, we cannot guarantee that all legislation has been included. Should you be aware of any specific piece of legislation that should be included in the abovementioned list and which has been omitted, please contact our Corporate Information Officer. Your assistance in this regard will be most appreciated.

7.3 RECORDS HELD BY PIONEER FOODS AND AVAILABLE AS CONTEMPLATED IN SECTION 51(1)(e) OF THE ACT

For ease of reference, below is an indication of the subjects of information that we hold:

- Company Secretarial Records
- Financial Statements and Financial Records
- Income Tax Records
- Group Legal and Compliance Records
- Human Resources Records, Training Records and Personnel Information
- ICT (I.e. Information, Communication and Technology) Records
- Environmental Management Records
- Health and Safety Records
- Production Records
- Research and Development Records
- Food Safety and Quality Control Records
- Sales Records
- Logistics and Distribution Records

8. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

A request for access to a record that does not fall within the categories identified in Section 7 of this manual must be done formally either via conventional mail, e-mail or fax.

This request should be in the prescribed format as defined in Government Notice Number 187, Regulation 6. A request form is also available from our offices. The prescribed *request fee* should be attached. Kindly refer to Section 9 of this manual, for more details on the fees.

Our Corporate Information Officer will respond to your request within *30 days* of receiving the request, by indicating whether your request for access has been granted.

Please note that an application for access to information can be refused, in the event that the application does not comply with the procedural requirements of the Act. In addition, the successful completion and submission of an access request form does not automatically allow the requestor, access to the requested record and/or information.

The request form must be completed *clearly* and *completely* in block letters. Should there be insufficient space on the printed request form in which to answer a question, additional information must be provided on a separate page that is clearly marked and referenced accordingly.

If access to a record and/or information is granted, our response will include:

- An indication of the access fee that should be paid upon gaining access (if any);
- An indication of the form in which the access will be granted;
- A notice that you may lodge an application with the court against the access fee to be paid or the form of the access, including guidance on the procedure for lodging the application.

If access to a record/information is denied, our response will include:

- Adequate reasons for the refusal; and
- Notice that you may lodge an application with the court against the extension and the procedure including the period, for lodging the application. For details on the procedure, please refer to Chapter 2 of Part 4 of the Promotion of Access to Information Act.

Assuming your request of access is granted, you will be able to gain access to the requested records as soon as is reasonably possible and once the relevant *access fee* has been paid.

Access will, however, *only* be granted to a record if the following criteria are fulfilled:

- The record is required for the exercise or protection of any right;
- The requestor complies with the procedural requirements in the Act relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of the Act.

9. FEES

There are two basic types of fees applicable in terms of the Promotion of Access to Information Act – “request” and “access” fees. The non-refundable request fee, is payable on submission of the request for access to a record unless the request is personal in which event there is no applicable fee.

An access fee is payable, prior to the actual gaining of access to the records in the required form.

The applicable fees are prescribed in terms of Part III of Annexure A as identified in Government Notice Number 187, Regulation 11.

10. REQUEST FOR ACCESS TO INFORMATION ABOUT THIRD PARTIES

If you request access to a record that contains information about a third party, we are obliged to attempt to contact this third party to inform them of the request and to give them an opportunity to respond by either consenting to the access or by providing reasons why the access should be denied.

In the event that the third party furnishes reasons for the support or denial of access, our designated Corporate Information Officer will consider these reasons in determining whether access should be granted.

You may appeal against a refusal of access by our Corporate Information Officer. Please refer to Part 4 of the Promotion of Access to Information Act for further details on the Appeal Process.

11. AVAILABILITY OF THE MANUAL

This manual is made available in terms of Regulation Number R187 of 15 February 2002.

A copy of the manual will be available for inspection at:

- Our head office (refer to the address provided below) and
- The South African Human Rights Commission

The manual will also be available on Pioneer Foods' intranet as well as on its external website (i.e. www.pioneerfoods.co.za).

12. DISCLAIMER

The manual does not allege to be exhaustive of or to comprehensively deal with every procedure provided for in the Act.

A requester is advised to familiarise him/her/itself with the provisions of the Act, before lodging any request with Pioneer Foods.



ANNEXURE A

“FORM C“

REQUEST FOR ACCESS TO A RECORD OF PIONEER FOODS

(Section 53(1) of the Promotion of Access to Information Act, 2000

(Act No. 2 of 2000)

[Regulation 10]

A. Particulars of Pioneer Foods (“private body”)

The Head: Mr André Hanekom
Managing Director
Pioneer Foods (Pty) Ltd
P.O. Box 20
Huguenot
7645
Republic of South Africa

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, i.e. when made on behalf of another person:

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

This section must be completed <i>ONLY</i> if a request <i>for information</i> is made on behalf of <i>another</i> 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 the record or relevant part of the record:
- 2 Reference number; i.e. 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:			
	A copy of record*		An inspection of record
2. If the 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?			YES NO
Note: If "YES", postage is payable.			

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