



# PIONEER FOODS

## INFORMATION MANUAL

OF

## PIONEER FOOD GROUP LIMITED

(Company Registration Number 1996/017676/06)

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

Ref No.: PFG\_PAIA\_180606

### Contents

1. INTERPRETATION .....	2
2. PREAMBLE .....	3
3. COMPANY OVERVIEW .....	3
4. SCOPE OF THIS MANUAL .....	4
5. GUIDELINE FOR REQUESTS TO ACCESS INFORMATION .....	4
6. ADMINISTRATION OF THE ACT .....	5
7. SUBJECTS AND CORRESPONDING CATEGORIES OF RECORDS .....	5
8. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION .....	7
9. FEES .....	8
10. REQUEST FOR ACCESS TO INFORMATION ABOUT THIRD PARTIES .....	8
11. AVAILABILITY OF THE MANUAL .....	8
12. DISCLAIMER .....	8

## 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 or the Group, 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 Group Chief Executive Officer 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 Food Group Limited (Registration number: 1996/017676/06), a "public company" 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 *eiusdem 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

- 2.1 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.
- 2.2 Section 51 of the Act requires that Pioneer Foods, as a public company, compiles a manual giving information to the public regarding the procedure to be followed in requesting information from us for the purpose of exercising and/or protecting rights.
- 2.3 This Manual is intended to fulfil this requirement.
- 2.4 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 she is Pioneer Foods' duly authorised and designated Corporate Information Officer.

## 3. COMPANY OVERVIEW

- 3.1 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.
- 3.2 Pioneer Foods is one of the largest South African producers and distributors of a range of branded food and beverage products. The Group operates mainly across South Africa, providing wholesale, retail and informal trade customers with products of a consistently high standard. Pioneer Foods exports to more than 60 countries across the globe. The growing international business represents 21% of operating profit.
- 3.3 The Group operates a number of world-class production facilities producing a range of products that includes some of the most recognisable and best loved brand names in South Africa, including the following power brands: Weet-Bix, Liqui-Fruit, Ceres, Sasko, Safari, Spekko and White Star.
- 3.4 The equity-accounted, joint venture investments based in South Africa, Nigeria, Botswana and Namibia do not form part of PFI's segmental results, but are managed by the International division.
- 3.5 Pioneer Foods was established in 1997 and listed on the Johannesburg Stock Exchange ("JSE") in 2008. It has three main divisions - these are:

- 3.5.1 **Essential Foods division** - manufactures wheat and maize products, pasta; it packs rice, beans and other dried vegetables and has large bakery operations.
- 3.5.2 **The Groceries division** - Groceries produces breakfast cereals, rusks, cake mixes, baking aids, dried fruit products, nuts, sweet and savoury spreads, processed salads, long-life fruit juices, fruit concentrate mixtures and dairy fruit blends.
- 3.5.3 **The International division** - is primarily structured around an export business model which is managed across two channels, namely "Africa and Rest of the World". This division also incorporates the Group's fruit operations and the wholly owned Bokomo Foods UK business.

#### 4. SCOPE OF THIS MANUAL

- 4.1 Pioneer Foods compiled this Manual not only to comply with the provisions of the Act, but also to foster a culture of transparency and accountability in its business environment and to ensure that members of the public have effective access to information in its possession, which will assist them in exercising and protecting their rights.
- 4.2 Recorded in this Manual, you will be able to view the categories of information which the Company holds. You will also be guided with regards to the correct procedure to follow should you require access to any of this information.
- 4.3 The scope of this Manual is, however, limited to information held by Pioneer Foods and all its wholly owned subsidiaries.

#### 5. GUIDELINE FOR REQUESTS TO ACCESS INFORMATION

- 5.1 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 and/or protect any right in terms of this Act.
- 5.2 This Guide can be obtained from the office of the SAHRC and is also published on their website listed below.
- 5.3 Enquiries regarding the Guide can be addressed to the South African Human Rights Commission, the contact details of which are as follows:

##### 5.3.1 **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

##### 5.3.2 **Telephone Details**

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

##### 5.3.3 **E-mail Address**

[paia@sahrc.org.za](mailto:paia@sahrc.org.za)

5.3.4 Website  
[www.sahrc.org.za](http://www.sahrc.org.za)

## 6. ADMINISTRATION OF THE ACT

6.1 The Group Chief Executive Officer (CEO) 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.

6.2 Accordingly, all requests for access to company records should be addressed to Pioneer Foods' Corporate Information Officer.

6.2.1 **Postal Address**  
Ms Jay-Ann Jacobs  
The Corporate Information Officer  
Pioneer Foods (Pty) Ltd  
P.O. Box 20  
Huguenot  
7645  
Republic of South Africa

6.2.2 **Physical Address**  
Ms Jay-Ann Jacobs  
The Corporate Information Officer  
Pioneer Foods (Pty) Ltd  
Glacier Place  
1 Sportica Crescent  
Tygervalley  
7530  
Republic of South Africa

6.2.3 **Telephone Details**  
Tel: 021 974 4000  
Fax: 0860 407 0222

6.2.4 **E-Mail Address**  
[info@pioneerfoods.co.za](mailto:info@pioneerfoods.co.za)

6.2.5 **Website**  
<http://www.pioneerfoods.co.za>

## 7. SUBJECTS AND CORRESPONDING CATEGORIES OF RECORDS

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

### 7.1.1 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 and are available on Pioneer Foods' website:

- General information pertaining to Pioneer Foods

The following records are available at the Registrar of Companies:

- Statutory Records - i.e. such as the Pioneer Foods' Annual Financial Statements, the Group's Interim Audited Report, the Memorandum and Articles of Association, etc. to mention only a few.

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

7.1.2.1 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 Pioneer Foods):

- 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).

7.1.2.2 Please note that whilst we have made every effort to identify all pertinent pieces of legislation, we cannot guarantee that all legislation has been included. Should you, hence, 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.

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

7.1.3.1 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

- 8.1 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.
- 8.2 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 regarding the fee.
- 8.3 Our Corporate Information Officer will respond to your request within 30 calendar days of receiving the request, by indicating whether your request for access has been granted.
- 8.4 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, kindly be advised that the successful completion and submission of an access request form does not automatically allow the requestor, access to the requested record and/or information.
- 8.5 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.
- 8.6 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.
- 8.7 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.
- 8.8 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.
- 8.9 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

- 9.1 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.
- 9.2 An access fee is payable, prior to the actual gaining of access to the records in the required form.
- 9.3 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

- 10.1 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.
- 10.2 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.
- 10.3 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

- 11.1 This Manual is made available in terms of Regulation Number R187 of 15 February 2002.
- 11.2 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
- 11.3 The Manual will also be available on Pioneer Foods' intranet as well as on its external website (i.e. [www.pioneerfoods.co.za](http://www.pioneerfoods.co.za)).

## 12. DISCLAIMER

- 12.1 The Manual does not allege to be exhaustive of or to comprehensively deal with every procedure provided for in the Act.
- 12.2 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 GROUP LIMITED

(Section 53(1) of the Promotion of Access to Information Act, 2000  
(Act No. 2 of 2000)

[Regulation 10]

##### A. PARTICULARS OF PIONEER FOODS

The Head: Mr Tertius Carstens  
Group Chief Executive Officer  
Pioneer Foods Group Limited

Glacier Place  
1 Sportica Crescent  
Tygervalley  
7530  
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 A 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:  
Postal address:  
Fax number:  
Telephone number (work):  
Mobile number:  
E-mail address:  
Capacity in which request is made:

**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 (the Requestor), 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 in full.

- 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 (the Requestor), 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 an 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
<p>Mark the appropriate box with an X.</p> <p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(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.</p> <p>(c) The fee payable for access of the record, if any, will be determined partly by the form in which access is requested.</p>	

<b>1. IF THE RECORD IS IN WRITTEN OR PRINTED FORM:</b>			
<input type="checkbox"/>	A copy of record*	<input type="checkbox"/>	An inspection of record
<b>2. IF THE RECORD CONSISTS OF VISUAL IMAGES</b> (This includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images"
<input type="checkbox"/>		<input type="checkbox"/>	transcription of the images*
<b>3. IF THE RECORD CONSISTS OF RECORDED WORDS OR INFORMATION WHICH CAN BE REPRODUCED IN SOUND:</b>			
<input type="checkbox"/>	listen to the soundtrack audio cassette	<input type="checkbox"/>	transcription of soundtrack* written or printed document
<b>4. IF THE RECORD IS HELD ON A COMPUTER OR IN AN ELECTRONIC OR MACHINE-READABLE FORM:</b>			
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record"
<input type="checkbox"/>		<input type="checkbox"/>	copy in computer readable form* (compact disc, memory card)
If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?  Note: If "YES", postage is payable.			<input type="checkbox"/> YES  <input type="checkbox"/> NO

**G PARTICULARS OF THE RIGHT TO BE EXERCISED OR PROTECTED**

1. 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.
2. Indicate which right is to be exercised or protected:
3. Explain why the record requested is required, for the exercise or protection of the aforementioned right:

**H. NOTICE OF THE DECISION REGARDING THE REQUEST FOR ACCESS**

You will be notified in writing whether your request has been approved or 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? Kindly advise.

Signed at.....

this..... day of .....20.....

.....  
SIGNATURE OF REQUESTER / PERSON ON  
WHOSE BEHALF THE REQUEST IS MADE