KAP INDUSTRIAL HOLDINGS LIMITED
Registration number 1978/000181/06

PAIA MANUAL
Manual prepared in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000, (the “Act”) for KAP Industrial Holdings Limited (“KAP”) and its major subsidiaries

KAP Industrial Holdings Limited – registration number 1978/000181/06

Board of directors of KAP
J de V du Toit (Independent non-executive chairman)
GN Chaplin (Chief executive officer)
KJ Grové (Non-executive deputy chairman)
FH Olivier (Chief financial officer)
LJ du Preez (Non-executive director)
TLR de Klerk (Non-executive director)
IN Mkhari (Independent non-executive director)
SH Müller (Independent non-executive director)
SH Nomvete (Independent non-executive director)
PK Quarmby (Independent non-executive director)

List of material subsidiaries
- Autovest Limited – registration number: 2007/010989/06
- DesleeMattex Proprietary Limited (60%) – registration number: 2009/018436/07
- Feltex Fehrer Proprietary Limited (74%) – registration number: 1947/025764/07
- KAP Automotive Proprietary Limited – registration number: 1957/001891/07
- KAP Bedding Proprietary Limited – registration number: 1988/070308/07
- KAP Diversified Industrial Proprietary Limited – registration number: 1965/003787/07
- KAP Homeware Proprietary Limited – registration number: 1951/003269/07
- Klipstone Transport Proprietary Limited (64%) – registration number: 1970/008336/07
- Langford Street Investments Proprietary Limited – registration number: 2001/011566/07
- Lucerne Transport Proprietary Limited (100%) – registration number: 1995/002028/07
- Maxe Proprietary Limited – registration number: 2004/007246/07
- Mega Express Proprietary Limited (65%) – registration number: 2004/027663/07
- Metz Industrial Holdings Proprietary Limited – registration number: 1976/001791/07
- Metz Industries Proprietary Limited – registration number: 1999/026990/07
- Metz Transport Proprietary Limited – registration number: 1982/006063/07
- PG Bison Proprietary Limited – registration number: 1999/016480/07
- Restonic Proprietary Limited – registration number: 1981/001023/07
- Rhino Lining SA Proprietary Limited – registration number: 2002/005101/07
- SA Canopy Centre Proprietary Limited – registration number: 1986/000535/07
- Setjhaba Carriers Proprietary Limited (74%) – registration number: 1998/024588/07
- Startrek Towbars Proprietary Limited – registration number: 2007/018812/07
INTRODUCTION

The Act, together with all relevant legislation, provides for the right of access to information held by public and private bodies when such information is requested for the exercise of protection of any rights.

This manual is to assist any potential requesters of the procedural and other requirements which a request for information must meet as prescribed by the Act.

Overview of KAP

KAP is a public company listed on the Johannesburg Stock Exchange with its registered address at 3rd Floor, Building 2, the Views, Founders Hill Office Park, 18 Centenary Street, Modderfontein 1645.

KAP is an industrial group, predominantly located in and focused on business operating in emerging African markets. KAP delivers services and manufactured products to a wide customer base through two main operating divisions:

1. Diversified logistics
   This includes:
   - a supply chain solutions division that designs, implements and manages supply chain and logistics services
   - a passenger transport division providing personnel, tourist and commuter transport services

2. Diversified industrial
   This includes:
   - an integrated timber division with timber plantations, saw mills and production facilities related to timber products
   - a chemical division producing and distributing urea formaldehyde resins for the panel industry and PET resin and polymer for local and international markets
   - an industrial manufacturing division which includes automotive components, furniture and bedding components and towelling

INFORMATION REQUIRED IN TERMS OF SECTION 51(1)(a) OF THE ACT

<table>
<thead>
<tr>
<th>KAP Industrial Holdings Limited, Registration number 1978/000181/06</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Physical address</strong></td>
</tr>
<tr>
<td>3rd Floor, Building 2, the Views, Founders Hill Office Park, 18 Centenary Street, Modderfontein 1645</td>
</tr>
<tr>
<td><strong>Postal address</strong></td>
</tr>
<tr>
<td>PO Box 2766, Edenvale 1610</td>
</tr>
<tr>
<td><strong>Telephone number</strong></td>
</tr>
<tr>
<td>+27 21 808 0900</td>
</tr>
<tr>
<td><strong>Fax number</strong></td>
</tr>
<tr>
<td>+27 21 808 0901</td>
</tr>
<tr>
<td><strong>Chief executive officer</strong></td>
</tr>
<tr>
<td>Gary Noel Chaplin</td>
</tr>
</tbody>
</table>
Section 10 guide
The Act requires the South African Human Rights Commission ("SAHRC") to compile a guide to be available in each official language, to assist individuals in understanding how to exercise their rights contained in the Act. Any queries regarding this guide can be addressed directly to the SAHRC at:

The South African Human Rights Commission
Private Bag x 2700, Houghton 2041
Tel: +27 11 877 3803
Fax: +27 11 403 0625
Email: paia@sahrc.org.za
Website: www.sahrc.org.za

C | RECORDS ARE KEPT IN TERMS OF THE FOLLOWING LEGISLATION

- Basic Conditions of Employment Act 75 of 1997
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Customs and Excise Act 91 of 1964
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act no 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Johannesburg Stock Exchange listing requirements
- Income Tax Act 58 of 1962
- Insider Trading Act No.135 of 1998
- Labour Relations Act 66 of 1995
- Skill Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Occupational Health and Safety Act 85 of 1993
- Prevention of Organised Crime Act 121 of 1998
- The Companies Act No. 71 of 2008
- The National Credit Act 34 of 2005
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991
- Such other legislation as may from time to time be applicable
D | NOTICE IN TERMS OF SECTION 51(1)(c)

No notice has been published to date in terms of Section 51(1)(c) of the Act. The following records are however automatically available on KAP’s website to any person requesting this information and it is therefore not necessary to apply for access thereto in terms of the Act:

- KAP’s Integrated Report
- Annual Financial Statements
- Interim Results
- Corporate Governance reports and policies
- Corporate Responsibility report
- Code of Ethics

E | RECORDS HELD BY KAP INDUSTRIAL HOLDINGS LIMITED IN TERMS OF SECTION 51(1)(e)

**Statutory**
- Memoranda of Incorporation
- Company Registers
- Statutory records and returns
- Agreements
- Trademarks and Patents
- Title Deeds

**Admin, Finance and Accounting**
- Accounting records
- Policies and procedures
- Banking details and bank statements
- Financial Statements
- Income Tax

**Human Resources**
- Policies and Procedures
- Employment equity plans
- Pension and Provident Fund Scheme details
- Skills development plans
- Records and reports

**Operations**
- Permits, licences, consents, approvals, authorisations, applications and registrations
- Policies and procedures
- Reports and supporting documentation
- Contractor, client and supplier agreements and information
- Documentation on Customs and Excise
- Environmental, Health and Safety records

**Information technology:**
- System documentation and manuals
- Project, disaster recovery and implementation plans
F | PROCEDURE FOR REQUEST FOR ACCESS (SECTION 53 TO 57 AND 60 OF THE ACT)

1. To request a document that does fall within the ambit of the Act, the requester must complete the prescribed form as set out in Annexure A (form C) hereto and submit same to the Information Officer via the contact details listed under B above.

2. The prescribed form must be completed with sufficient detail to enable the Information Officer to clearly identify the record/s requested, the requester’s identity and which form of access to the records is required, should the request be granted. The requester must explain what other right is being protected or exercised.

3. If the request is being made on behalf of another person, the requester must submit proof, to the satisfaction of the Information Officer, of the capacity in which they are making the request.

4. The Information Officer will process the request and notify the requester of its decision whether or not the request has been granted. Should the request be granted, the notice will state the access fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to public and private bodies can be accessed on www.sahc.org.za.

5. Should the request be refused, the notice will state adequate reasons for the refusal.

G | GROUNDS FOR REFUSAL OF ACCESS TO RECORDS (SECTION 63 TO 69 OF THE ACT AND THE PROTECTION OF PERSONAL INFORMATION ACT NO. 4, 2013)

Access to certain records may be or must be denied on the grounds set out in the Act. This includes:

- Mandatory protection of privacy of a third party who is a natural person;
- Mandatory protection of commercial information of third party;
- Mandatory protection of certain confidential information of third party;
- Mandatory protection of safety of individuals, and protection of property;
- Mandatory protection of records privileged from production in legal proceedings;
- Commercial information of private body;
- Mandatory protection of research information of third party, and protection of research information of privacy body.

H | AVAILABILITY OF THE MANUAL

Copies of this manual are available for inspection, free of charge, at the registered offices of KAP Industrial Holdings Limited. Copies are also available from the South African Human Rights Commission and on our website (www.kap.co.za).
ANNEXURE A

REQUEST FOR ACCESS TO THE RECORD OF A PRIVATE BODY
Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)

[Regulation 10]

FORM C

A | PARTICULARS OF A 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: _________________________________________________________________
Telephone number: __________________________ Fax number: ___________________________
Email 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:

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 to 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 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 the soundtrack*  [ ]

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* (compact disc)  [ ]

* If you requested a copy of the 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 by alternative means, 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 access to the record?

Signed at ____________________________ this __________ day of ______________________2018

**Signature of requester/person on behalf of whom request is made**