

PAIA POLICY

1. INTRODUCTION

The Rezco Group (“Rezco”) comprises of a group of companies incorporated to carry on business in the South African financial industry. The details of the companies that constitute Rezco / the Rezco Group are:

- Rezco Asset Management (Pty) Ltd¹, the parent company of the group holding full controlling interest in the subsidiary entities, at registration number 2004/010319/07 with registered address 146 Main Road, Walmer, Port Elizabeth, 6070;
- Rezco Investment Counsel (Pty) Ltd², an approved Financial Services Provider (FSP702), with registration number 1980/009077/07 at registered address 146 Main Road, Walmer, Port Elizabeth, 6070;
- Rezco Collective Investments Ltd, an authorised Collective Investment Scheme Manager, with registration number 2004/012079/06 at registered address 146 Main Road, Walmer, Port Elizabeth, 6070.

The entities in the group are private bodies³ in terms of the Promotion of Access to Information Act 2 of 2000 (PAIA). This policy documents the categories of records held by Rezco and the procedures that need to be followed to request access to such records.

2. PURPOSE

PAIA applies to a record⁴ of information in the possession or under the Rezco’s control irrespective of whether it was created by Rezco or not and regardless of when the record came into existence.⁵ The objectives of PAIA is to give effect to the constitutional right of access to information, namely:

- information held by Rezco that is required for the exercise or protection of any rights and to give effect to that right subject to the justifiable limitations, including but not limited to, limitations aimed at the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance;⁶
- to establish voluntary and mandatory mechanisms or procedures to give effect to that right in a manner which enables any person to obtain access to Rezco’s records as swiftly, inexpensively and effortlessly as reasonably possible.⁷

¹ A process is underway to change this name to Rezco Corporate Investments (Pty) Ltd for future reference.

² A process is underway to change this name to Rezco Asset Management (Pty) Ltd for future reference.

³ PAIA: Sec 1 defines a “private body” as any former or existing juristic person.

⁴ PAIA: Sec 1 defines a “record” to be, of or in relation to a Rezco, any record of information, regardless of the form or medium, in the possession or under the control of that Rezco irrespective of whether it was created by Rezco body or not.

⁵ PAIA: See Sec 1 definition of a “record” read with Sec 3(b).

⁶ PAIA: Sec 9(a)-(b).

⁷ PAIA: Sec 9(c).



3. THE SECTION 10 GUIDE ON HOW TO USE PAIA⁸

The South African Human Rights Commission (SAHRC) has compiled and published a useful guide in terms of section 10 of PAIA, containing valuable information for the purposes of exercising any right in terms of PAIA. The guide is made available in all official languages on the website of the SAHRC at the following URL:

<https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>

The contact details of the SAHRC are as follows:

Postal Address: : Private Bag 2700, Houghton, 2041

Telephone Number : 011 877 3600

Fax Number : 011 403 0625

Website : www.sahrc.org.za

4. INFORMATION OFFICER PARTICULARS⁹

Information Officer	Ronald Cape
Street Address	146 Main Road, Walmer, Port Elizabeth, 6001
Postal Address	146 Main Road, Walmer, Port Elizabeth, 6001
Telephone	041 581 1525
Email	compliance@rezco.co.za
Website	www.rezco.co.za

5. RECORDS

Information / Documents available on Rezco's website need not be requested in terms of PAIA. Any other information / documents must be made in the manner prescribed in this policy document.

5.1 Records in terms of legislation¹⁰

Rezco is subject to all the laws of the Republic of South Africa. Rezco holds the following information, documents or records in terms of various legislation, namely:

Basic Conditions of Employment Act, 75 of 1997

Collective Investment Schemes Control Act 45 of 2002

Companies Act, 71 of 2008

Compensation for Occupational Injuries and Health Diseases Act, 130 of 1993

Copyright Act, 98 of 1978

Employment Equity Act, 55 of 1998

Employment Equity Act, 55 of 1998

⁸ As required i.t.o Sec 51(1)(b) of PAIA.

⁹ As required i.t.o Sec 51(1)(a) of PAIA.

¹⁰ As required i.t.o. 51(1)(d) of PAIA.



Financial Advisory and Intermediary Services Act, 37 of 2002

Financial Intelligence Centre Act, 38 of 2001

Income Tax Act, 95 of 1967

Labour Relations Act, 66 of 1995

Occupational Health & Safety Act, 85 of 1993

Skills Development Act, 9 of 1999

Unemployment Insurance Act, 63 of 2001

Value Added Tax Act, 89 of 1991

The list is not exhaustive.

5.2 Categories of records

5.2.1 Company records

- Company registration documents
- Minutes of Board meetings
- Minutes of Audit & Risk Committee meetings
- Resolutions
- Records pertaining to the appointment of directors, auditors, company secretary and other officers (where applicable)
- Share register and other statutory registers
- Statutory reports

5.2.2 Operation records

- Policies required in terms of applicable statute
- Services level agreements
- Internal policies and procedures
- Technologies and data systems, including software and licenses
- Professional indemnity
- Compliance reports
- Databases
- Funds and related records
- Internal correspondence

5.2.3 Financial records

- Annual Financial Statements for each entity as well as every fund
- Audit reports and other accounting records
- Income tax returns



- Bank statements and related records
- Register of assets
- Invoices and payments in respect thereof
- Donations made

5.2.4 Income tax and other regulatory-related records

- PAYE records
- Documents issued to employees for income tax purposes
- Record of payments to SARS on behalf of employees
- Record of VAT payments and claims
- Annual levies and other fees paid to the FSCA

5.2.5 Personnel and labour law related records

- Employment contracts and personnel records
- Other personnel-related contractual and quasi-legal records
- Records provided by a third party relating to personnel
- Recruitment and selection policies, procedures and reports
- Disciplinary actions and proceedings
- Salary records
- Leave records
- Remuneration records and policies
- COIDA levies and claims
- Skills and Development levies and rebates
- Skills and Development reports and plans
- Minutes of Employment Equity Committee meetings
- Employment Equity Plan
- Employment Equity reports
- Training records

6. MAKING A REQUEST TO ACCESS ANY RECORDS HELD BY REZCO

6.1 Form

A requestor must complete the prescribed Form C set out in Annexure A and submit it to the Information Officer of Rezco at compliance@rezco.co.za

The requestor must specify in relation to which entity the request for access to records is applicable. The form must be completed in full. The requestor must provide sufficient details as to the type and extent of



information to which access is sought in order for the Information Officer to correctly identify the record required. The requestor must also state the format in which the record of information must be provided.

The requestor must identify the right he / she wants to exercise or that needs to be protected along with an explanation as to why the requested record is required.

If a request is made on behalf of another person, the requestor must submit proof of his / her authorisation to do so.

If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hour to search and prepare the record for disclosure.

6.2 Fees

A requestor that wants access to a record containing personal information relating to the requestor is not required to pay a request fee. Every other requestor must pay the required request fee from time to time.

If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee 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 fees can be downloaded from the following URL: <https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

7. AVAILABILITY OF THE PAIA POLICY

This manual is available for inspection at the offices of the company free of charge upon prior arrangement with the Information Officer. A copy is also made available on the website of the company.

Name : Ronald Cape

Signature : 

Designation : Director

Signed on this day of 17 December 2020 at Port Elizabeth

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ANNEXURE A: FORM C - REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

i.t.o Section 53(1) of the Promotion of Access to Information Act, 2 of 2000 [Regulation 10]

A.	Particulars of Rezco entity in relation to which request for access is made	
1.	Information Officer:	
2.	Entity (Name and Registration No.):	
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.	
1.	Name & Surname:	
2.	ID Number:	
3.	Postal Address:	
4.	Telephone Number:	
5.	Email Address:	
6.	Capacity of requestor	
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).	
1.	Name & Surname / Registered Name	
2.	ID No. / Reg No.	
D.	Particulars of record to which access is sought	
	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. c) c) The requester must sign all the additional folios.	
1.	Description of record or relevant part thereof:	



2.	Reference number (if applicable):						
3.	Any further particulars of the record:						
E.	Fees						
	<p>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.</p> <p>b) You will be notified of the amount required to be paid as the request fee.</p> <p>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.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.</p>						
1.	Reason for exemption from payment of fees:						
F.	Form of access to record						
	DISABILITY ACCOMODATION: 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.						
	<p>GENERAL:</p> <p>Mark the appropriate box with an X.</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 for the record, if any, will be determined partly by the form in which access is requested.</p>						
1.	If the record is in written or printed form:						
	<table border="1"> <tr> <td>Copy of record*</td> <td><input type="checkbox"/></td> <td>Inspection of record</td> <td><input type="checkbox"/></td> </tr> </table>	Copy of record*	<input type="checkbox"/>	Inspection of record	<input type="checkbox"/>		
Copy of record*	<input type="checkbox"/>	Inspection of record	<input type="checkbox"/>				
2.	If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)						
	<table border="1"> <tr> <td>View images</td> <td><input type="checkbox"/></td> <td>Copy images*</td> <td><input type="checkbox"/></td> <td>Transcription of images*</td> <td><input type="checkbox"/></td> </tr> </table>	View images	<input type="checkbox"/>	Copy images*	<input type="checkbox"/>	Transcription of images*	<input type="checkbox"/>
View images	<input type="checkbox"/>	Copy images*	<input type="checkbox"/>	Transcription of images*	<input type="checkbox"/>		
3.	If record consists of recorded words or information which can be reproduced in sound:						
	<table border="1"> <tr> <td>Listen to audio</td> <td><input type="checkbox"/></td> <td>Transcription of soundtrack (written / printed)*</td> <td><input type="checkbox"/></td> </tr> </table>	Listen to audio	<input type="checkbox"/>	Transcription of soundtrack (written / printed)*	<input type="checkbox"/>		
Listen to audio	<input type="checkbox"/>	Transcription of soundtrack (written / printed)*	<input type="checkbox"/>				
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 record*		Copy of record in digital format*	
*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
G.	Particulars of right to be exercised or protected					
	a) If the provided space is inadequate, please continue on a separate page and attach it to this form. b) The requester must sign all the additional pages.					
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					
	a) You will be notified in writing whether your request has been approved/denied. b) If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.					
1.	How would you prefer to be informed of the decision regarding your request for access to the record?					

Signed at _____ this _____ day of _____ 20_____

Signature: _____

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE

