

HOLDSPORT GROUP (PTY) LIMITED

Registration number: 2022/407472/07



PROMOTION OF ACCESS TO INFORMATION MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (“the Act”)

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1 INTRODUCTION

- 1.1 The 1996 South African Constitution provides a statutory right of access on request to any record held by the state as well as access to records held by the State or any other person that is required for the exercise or protection of any right.
- 1.2 The Promotion of Access to Information Act, 2 of 2000 (“PAIA”), which came into effect on 9 March 2001, seeks to advance the values of transparency and accountability in south Africa and provides the mechanism for requesters to exercise their constitutional right.
- 1.3 PAIA establishes the following statutory rights of requesters to any record of a private body if:
 - 1.3.1 That record is required for the exercise or protection of any of his or her legal rights.
 - 1.3.2 That requester complies with all the procedural requirements.
 - 1.3.3 Access is not refused in terms of any ground referred to in PAIA.
- 1.4 The information in this manual is published on Holdsport Group (Pty) Limited (“the Company” or Holdsport’s”) website, www.holdsport.co.za, in accordance with the requirements of Section 51 of PAIA to facilitate access to records held by the Company.

2 OVERVIEW OF THE COMPANY

2.1 Establishment of the Company

The Company was incorporated as a private company in 2022 ,

2.2 Objectives of the Company

- 2.2.1 The Company operates a number of retail and wholesale businesses in the sporting and outdoor sectors which seeks to generate superior returns to its shareholders over the medium to long term.
- 2.2.2 The board of directors is responsible for capital allocation and plays an active role in identifying, approving and executing attractive investment opportunities.

2.2.3

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4 KEY CONTACT DETAILS

Any queries in relation to this manual may be sent by email to:

The chief Financial Officer: Mireille Levenstein, Chief financial Officer
Email: mireille@holdsport.co.za

5 GUIDE ON HOW TO USE THE PROMOTION OF ACCESS TO INFORMATION ACT

The Human rights Commission has compiled a guide, as referred to in Section 10 of the Promotion of Access to Information Act 2 of 2000. The guide contains information to assist a person wishing to exercise a right in terms of the Act. The Guide is available for inspection from:

The South African Human Rights Commission
PAIA Unit
Forum 3, Braampark Office Park, 33 Hoofd Street, Braamfontein
Website: <http://www.sahrc.org.za>
Postal address: Private Bag 2700, Houghton, 2041
Telephone: 27 11 877 3600
Gauteng Provincial office 27 11 877 3750
Email: PAIA@sahrc.org.za
info@sahrc.org.za

6 RECORDS AVAILABLE AND HELD IN ACCORDANCE WITH OTHER LEGISLATION: SECTION 51(1)(d)

6.1 Section 51(1)(d) of the Promotion of Access to Information Act stipulates that the Company is required to maintain records pertaining to all other legislative requirements which pertain to the Company's business and which the Company adheres to.

6.2 As such the company holds and maintains records in accordance with the following legislation:

- Basic conditions of Employment Act, No 75 of 1997
- The constitution of the Republic of South Africa, 1996
- Companies Act No 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act No 89 of 1998
- Consumer Protection Act 68 of 2008
- Employment Equity Act 55 of 1998
- Financial Markets Act 19 of 2012
- Electronic Communications and Transactions Act No 2 of 2000
- Financial Intelligence Centre Act No 38 of 2001

- Income Tax Act No 58 of 1962
- Labour Relations Act No 66 of 1995
- Promotion of Access to information Act No 2 of 2000
- Protection of Personal Information Act 2013
- Unemployment Insurance Act No 63 of 2001
- Value-added Tax Act No 89 of 1991

7 RECORDS HELD / GENERATED BY THE COMPANY

7.1 Categories of Records

The categories of records generated by the company are classified in the manner listed below in 7.1.2. The company is required by legislation to hold certain records and a list of some of the applicable legislation is referred to in 6.2 above.

7.2 Categories of records automatically available

PAIA requires institutions to list those records that are freely available. Such automatically available records usually do not have information that can reasonably be said to be of a sensitive nature. The records which fall into this category of information are available from the Company at its head office and do not require a formal process to access same. Some of the categories, encompassing these records and which are available on the Company's website, www.holdsport.co.za, include:

- Media releases

7.3 Categories of records not automatically available

Category B (These records must be formally requested by lodging a request form* - refer to Form A attached hereto. The provision of these records are subject to the conditions as set out in 7.3.1 and 7.3.2 below)

Administration	Policies and procedures
Statutory records/legal	Incorporation documents Memorandum of Incorporation Share register and statutory returns to relevant authorities
Investments	General contract information
Information management and technology	Contract agreements with service providers Policies, procedures and guidelines
Financial	Tax registration Asset register

7.3.1 Whilst the records listed in the categories above may be formally requested, access to all or parts of these records may be refused or restricted to satisfy the objectives as set out in the Promotion of Access to Information Act (Section 9), which include the observation of limitations aimed at the reasonable protection of privacy, commercial confidentiality (such as a confidence owed to a third party in terms of an agreement) and effective, efficient and good governance, and in a manner which balances the right to access of information with any other rights, including those set out in the Bill of Rights in Chapter 2 of the Constitution.

7.3.2 The Company further reserves the right to refuse access to records where the processing of the record will result in a substantial and unreasonable diversion of its resources or which are sensitive in nature. Access will also be refused where requests are clearly frivolous and/or vexatious.

8 REQUEST PROCEDURE

8.1 Telephonic requests

Requests made to the Company telephonically are not valid and will not be entertained.

8.2 Voluntary access

Information that is automatically available can be obtained from the Company's website, or in writing via the email address provided under 4 above. Where applicable, a reproduction fee will be charged. Transcription and copying of records in or onto other media attract reproduction fees.

8.3 Formal requests and fees payable

8.3.1 The requester must complete the prescribed form attached hereto, namely Form A.

- Requesters will be assisted in completing the form if required.
- The requester must indicate the form or manner of access required.
- The Company will endeavor to provide information in the form requested where possible.
- A timeframe of up to 30 (thirty) business days is permitted for the company to respond to the request. These 30 (thirty) days may be further extended to another 30 (thirty) business days if necessary on notification to the requester.
- Fee impositions are prescribed in terms of the PAIA. A fee schedule is attached hereto. Fees are payable at the inception of a request and thereafter, fees are incurred for search processes and reproduction costs. Certain categories of persons are exempt from paying fees. These categories include those persons who are requesting their own personal information, or that relating to their minor children.

8.3.2 If a person is making a request on behalf of another, then written evidence that they have been requested to do so must be submitted to the Company.

8.3.3 If a request is granted, then a further access or search fee is required. This fee is calculated in terms of the rates set out in the attached regulation. Fees are charged for time spent searching for the record and preparing and / or reproducing the record/s.

9 REQUEST FEES AND PAYMENT METHOD

9.1 PAIA prescribe fees that must be paid by a requester when applying to access information. The fee schedule is attached hereto.

9.2 All payments are to be made directly into the bank account of the company.

9.3 Requests for voluminous non-personal records will not be accepted without prior payment.

10 AVAILABILITY OF THIS MANUAL

The manual is available in English and will be available at the Company itself and on the Company's website www.holdsport.co.za

11 UPDATING OF THIS MANUAL

This manual will be updated whenever amendments to current legislation pertaining to access to information need to be reflected, or as required by the Company.

12 EXEMPTION FROM THE MINISTER

The Minister may exempt any public body or category of public bodies from any provision of Section 14 of the promotion of Access to Information Act for such period as the Minister thinks fit. The company is not exempt from any provision of Section 14 of the Promotion of Access to Information Act.

13 MISSING RECORDS

Requesters have the right to receive a response in regard to records which cannot reasonably be located, but to which a requester would have had access had the record been available.

14 DISPOSAL OF RECORDS

Requesters will be advised whether a particular record has been disposed of where this is relevant to the records requested.

15 GENERAL NOTE

The Company reserves the right to transfer request for records to relevant bodies where these bodies were the primary holders or generators of the information requested, or where the Company no longer has possession of such record, and to create new categories of records where this is necessary. The manual will be updated to reflect changes in categories of records accordingly.

Schedule of fees	
Description	Fee
The fee for a copy of the manual as contemplated in regulation 5© is R0.60 for every photocopy of an A4-size page or part thereof.	R0.60
Reproduction fees: Regulation 7(1)	
For every photocopy of an A4-size page or part thereof	R0.60

For every printed copy of a4-size page or part thereof held on a computer or n electronic or machine-readable form	R0.40
For a copy in a computer-readable form on: (i) Compact disc	R40.00
For a transcription of visual images: (i) For a4-size page or part thereof	R22.00
(ii) Copy of visual images	R60.00
(iii) Transcription of an audio record, A4-size page or part thereof	R12.00
(iv) Copy of an audio record	R17.00
Request fee payable by a requester, other than a personal requester	R35.00
Search fees - to search and prepare a record for disclosure. The fee is charged per hour (or part of the hour); the first hour is free.	R15.00
For purposes of Section 22(2) of the Act, the following applies: a) In the event that the preparation of the record requested exceeds preparation time of six hours, a deposit will be payable by the requester; and b) One third of the access fee is payable as a deposit by the requester.	
The actual postage is payable when a copy of a record must be posted to a requester.	

Formal Request Form for Documents not automatically available

Form A

REQUEST FOR ACCESS TO RECORD(S) OF HOLDSPORT (Pty) LTD Section 53 (1) of Promotion of Access to Information Act, 2000)

A. Particulars of private body

Contact details	
Chief Executive Officer (as defined in PAIA)	
Information officer	
Postal address	
Physical address	

Telephone number	
Email address	

B. Particulars of person requested a record

- a) The particulars of the person who requests access to the record must be given below.*
b) The address, e-mail 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.
d) If the request is made on behalf of another person, evidence of the capacity in which the request is made, is also to be provide with the request.

Contact details	
Full name	
Identity number	
Postal address	
Physical address	
Telephone number	
Email address	

C. Particulars of person on whose behalf request is made

<i>This section must be completed ONLY if a request for information is made on behalf of another person</i>	
Full name	
Identity number	
Capacity in which request is made	

D. Particulars of the record

- a) Provide full particulars of the record t 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) The requester’s attention is drawn to the grounds on which the private body must or may refuse access to a record (in certain instances this may be mandatory, in others I may be discretionary).
- Mandatory protection of the 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 a third party
Mandatory protection of the safety of individuals and the protection of property
Mandatory protection of records privileged from production in legal proceedings
Commercial information of a private body
Mandatory protection of research information of a third party and a private body

The requester must sign all the additional folios.

Description of the record or relevant part of the record:

Reference number, if available:

Any further particulars of the record:

E. Description of record or relevant part of the record

Category	Description of record

F. Fees

- a) *A request for access to a record, other than a record containing personal information about yourself, will be processed only after the required 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 I which access is required and the reasonable time required to search for and prepare the record.*
- d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption*

**The requester qualifies for an exemption in payment of fees
(mark the applicable box)**

Yes

No

Reason:

G. 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 below, 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 for access 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
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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 the record consists of recorded words or information which can be reproduced in sound:			
	Listen to the soundtrack (audio cassette)		Transcription of the soundtrack* (written or printed document)

4. If the record is held on a computer or in an electronic or machine-readable form			
	Printed copy of the record		Printed copy of information derived from the record*
			Copy in computer readable form* (Compact Disc)

*If you requested a copy of transcription of a record (above), do you wish the copy or transcription to be posted to you?	Yes	No
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Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available.

In which language would you prefer the record?

H. Notice of decision regarding request for access

Requesters will be notified in writing whether their request has been approved/denied.

Signed at this day of 20

SIGNATURE OF REQUESTER/
PERSON ON WHOSE BEHALF REQUEST IS MADE

