

INDLUPLACE PROPERTIES LIMITED

(Registration Number: 2013/226082/06)

and its subsidiaries

(“Indluplace Group” or “the Company”)

MANUAL

in terms of

Section 51 of

The Promotion of Access to Information Act 2/2000

(the "ACT")

The ACT seeks amongst others to encourage openness and to establish voluntary and mandatory mechanisms or procedures which give effect to the right of access to information in a speedy, inexpensive and effortless manner as is reasonably possible and to promote transparency, accountability and effective governance of all public and private bodies, by empowering and educating everyone to understand their rights in terms of the ACT.

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1. **INTRODUCTION**

Indluplace Properties Limited (“**Indluplace**”) was incorporated in December 2013 and debuted in the Real Estate Sector of the JSE Limited in June 2015. Indluplace is a Real Estate Investment Trust and owns a portfolio of residential properties in its own name and through some of its subsidiaries.

The Indluplace Group consist of the following subsidiaries:

- Indluplace
- Aloegate Properties (Pty) Ltd
- Aptotrim (Pty) Ltd
- Barvickarl Investments (Pty) Ltd
- Buffshelfco 7 (Pty) Ltd
- Dalem Investments (Pty) Ltd
- Diluculo Properties (Pty) Ltd
- Earlsden (Pty) Ltd
- Erf 427 Windsor (Pty) Ltd
- First Residential Project (Pty) Ltd
- G and N Enterprises (Pty) Ltd
- Helen Joy Holdings (Pty) Ltd
- Indluprop I (Pty) Ltd
- Indluprop II (Pty) Ltd
- Ixonix (Pty) Ltd
- Indluplace Property Services (Pty) Ltd
- Jika Properties (Pty) Ltd
- Karavas Properties (Pty) Ltd
- Kenwyn Flats (Pty) Ltd
- Monks Court (Pty) Ltd
- Myso Holdings (Pty) Ltd
- NDF 15 Investment and Trading (Pty) Ltd
- Pondos Investments (Pty) Ltd
- Radzyn Investments Share Block (Pty) Ltd
- Resico (Pty) Ltd
- Sunnysore Trade and Invest 103 (Pty) Ltd
- Teaca Properties (Pty) Ltd
- Triaid (Pty) Ltd
- Unlocked Properties 6 (Pty) Ltd
- Unlocked Properties 10 (Pty) Ltd
- Unlocked Properties 11 (Pty) Ltd
- Unlocked Properties 12 (Pty) Ltd
- Unlocked Properties 13 (Pty) Ltd
- Unlocked Properties 14 (Pty) Ltd
- Unlocked Properties 21 (Pty) Ltd
- Yieldex 1 (Pty) Ltd
- Yieldex 4 (Pty) Ltd
- Yieldex 7 (Pty) Ltd
- Yieldex 10 (Pty) Ltd
- Yieldex 11 (Pty) Ltd
- Yieldex 12 (Pty) Ltd
- Yieldex 13 (Pty) Ltd
- Erf 737 Rosettenville (Pty) Ltd

2. COMPANY CONTACT DETAILS

Indluplace Directors:

Mr. T Adler (Chairman)

Mr. C de Wit (Chief Executive Officer)

Mr. T Kaplan (Financial director)

Mr. G Harris (Chief Operating Officer)

Mr. C Abrams (Non-executive director)

Mr. S Noik (Non-executive director)

Ms. A Rehman (Non-executive director)

Ms. N Tetyana (Non-executive director)

3. CONTACT PERSON

CEO: Mr. C de Wit

Postal Address: P.O. Box 685, Melrose Arch, 2076

Street Address: 2nd Floor, 158 Jan Smuts Building, 9 Walters Street, Rosebank, Johannesburg

Telephone Number: +27 10 085 4000

Email: carel@indluplaceproperties.co.za

4. THE ACT AND SECTION 10 GUIDE

- 4.1** The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 4.2** Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with below.
- 4.3** Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041

Telephone Number: +27-11-877 3600

Fax Number: +27-11-403 0625

Website: www.sahrc.org.za

5. APPLICABLE LEGISLATION

<u>No</u>	<u>Ref</u>	<u>Act</u>
1	No. 58 of 1962	Income Tax Act
2	No 98 of 1978	Copyright Act
3	No 89 of 1991	Value Added Tax Act
4	No 66 of 1995	Labour Relations Act
5	No 75 of 1997	Basic Conditions of Employment Act
6	No. 19 of 1998	Prevention of Illegal Eviction from Unlawful Occupation of Land Act
7	No 2 of 2000	Promotion of Access to Information Act
8	No 63 of 2001	Unemployment Insurance Act
10	No. 34 of 2005	National Credit Act
11	No. 68 of 2008	Consumer Protection Act
12	No.71 of 2008	Companies Act
13	No. 4 of 2013	Protection of Personal Information Act
14	No. 35 of 1999	Competition Act

6. RECORDS

<u>Records</u>	<u>Subject</u>	<u>Availability</u>
Public Affairs	<ul style="list-style-type: none">• Sens announcements• Media Releases• Corporate governance	Freely available on website www.indluplaceproperties.co.za
Financial	<ul style="list-style-type: none">• Integrated Annual Reports• Interim Results• Financials	Freely available on website www.indluplaceproperties.co.za
Marketing	<ul style="list-style-type: none">• Overview of portfolio	Limited information available on web site www.indluplaceproperties.co.za
Other		Request in terms of the ACT

7. FORM OF REQUEST

To facilitate the processing of your request, kindly:

- 7.1 Use the prescribed form, attached as **Annexure A**.
- 7.2 Address your request to the contact person detailed in paragraph 3 above.
- 7.3 Provide sufficient details to enable the Company to identify:
 - (a) The record(s) requested;

- (b) The requester (and if an agent is lodging the request, proof of capacity);
- (c) The form of access required;
- (d) The postal address or fax number of the requester in the Republic of South Africa;
- (e) If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
- (f) The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right; and
- (g) Once the request for information has been submitted to the Company, the designated contact person will notify the requestor should the request be granted.

8. PRESCRIBED FEES

The following applies to requests (other than personal requests):

- 8.1** A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- 8.2** 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);
- 8.3** A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 8.4** Records may be withheld until the fees have been paid;
- 8.5** The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.

9. GROUND FOR REFUSAL

The ACT provides a number of grounds on which a request for access to information must be refused. These grounds are usually where the privacy and interests of individuals may be infringed by the disclosure of the information, where such records are already otherwise publicly available, instances where public interest would not be served by the disclosure of the information, where there is a duty on the part of Company to protect the confidential information of a third party and instances where the request is manifestly frivolous or vexatious or will amount to a substantial or unreasonable diversification of resources.

Annexure A

REQUEST FOR INFORMATION

1 PARTICULARS OF PERSON REQUESTING ACCESS TO INFORMATION

Full Names and surname:

Identification number:

Telephone number:

Fax number:

e-Mail:

2 PARTICULARS OF PERSON ON WHOSE BEHALF THE REQUEST IS MADE

Only complete this section if a request for information is made on behalf of another person

3 PARTICULARS OF REQUESTED INFORMATION

Provide full particulars of the information to which access is requested. If the provided space is inadequate please continue on a separate page and attach to this form

4 FORMAT IN WHICH INFORMATION IS REQUIRED

Indicate the format in which the information requested is required. Please note that the request for access in the specified format in which the record is available.

5 RIGHT TO BE EXERCISED OR PROTECTED

Indicate the right that is to be exercised and/or protected and why the information is required to protect and/or to exercise this right

Signed at _____ on this _____ day of _____ 20 _____
