



GRAND PARADE
INVESTMENTS LIMITED

GRAND PARADE INVESTMENTS LIMITED
(Registration number 1997/003548/06)

MANUAL ON ACCESSING THE GPI GROUP'S INFORMATION
(in terms of section 51 of the Promotion of Access to Information Act, No 2 of 2000)

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1. INTRODUCTION

Grand Parade Investments Limited is an investment holding company listed on the Johannesburg Stock Exchange. The company and its subsidiaries are private bodies for purposes of the Promotion of Access to Information Act.

The GPI Group has interests in casinos and through certain of its subsidiaries, operates limited payout machines in various provinces. The Group comprises the following subsidiary companies:

- GPI Management Services (Pty) Ltd
- GPI Slots (Pty) Ltd
- Grand Lifestyle (Pty) Ltd
- Grand Capital (Pty) Ltd
- Thuo Gaming Western Cape (Pty) Ltd
- Thuo Gaming KwaZulu-Natal (Pty) Ltd
- Thuo Gaming Gauteng (Pty) Ltd
- Thuo Gaming North-West (Pty) Ltd
- Thuo Gaming Mpumalanga (Pty) Ltd
- Thuo Gaming Free State (Pty) Ltd
- Utish Investments (Pty) Ltd
- Business Venture Investments 575 (Pty) Ltd

This Manual is intended to assist persons requesting access to information or documents from the GPI Group and may be amended from time to time.

This Manual is available for inspection at no cost during office hours at the GPI Group Head Office situated at the address given in section 2 below or our website or from the South African Human Rights Commission whose details are provided in section 3 below.

2. CONTACT DETAILS

Name:	<i>Grand Parade Investments Limited or the GPI Group</i>
Registered Postal Address:	<i>P O Box 6563 Roggebaai 8012</i>
Registered Office Address:	<i>12th Floor, Convention Tower Heerengracht Street Foreshore Cape Town</i>
Telephone No:	<i>021 4217771</i>
Fax No:	<i>021 4214820</i>
Head:	<i>Hassen Adams – Group Executive Chairman</i>
Designated Information Officer:	<i>Hayley Fortune</i>
Website:	www.grandparade.co.za

3. THE OFFICIAL SOUTH AFRICAN HUMAN RIGHTS COMMISSION GUIDE

As required by section 10 of the Promotion of Access to Information Act, the South African Human Rights Commission (“SAHRC”) has published a Guide in all official languages containing information that may reasonably be required by a person who wishes to exercise any right in terms of the Act.

The Guide is available at <http://www.sahrc.org.za> or the SAHRC offices indicated below.

Braampark Forum
333 Hoofd Street
Braamfontein
Tel: 011 877 3600

4. INFORMATION AVAILABLE IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT

4.1 Information automatically available

The following categories of record are automatically available for perusal or purchase without having to request access thereto in terms of the procedure prescribed in the Promotion of Access to Information Act:

- Shareholder Newsletters
- Group information pamphlets and sales brochures
- Annual and Interim Financial Statements/Reports
- Company website - www.grandparade.co.za
- SENS announcements
- Presentations to analysts

4.2 Information retained in terms of other legislation

Records in terms of the following legislation are maintained as applicable to our operations –

- Basic Conditions of Employment Act No. 75 of 1997
- Broad Based Black Economic Empowerment Act No. 53 of 2003
- Companies Act No. 71 of 2008
- Employment Equity Act No. 55 of 1998
- Financial Intelligence Centre Act No. 38 of 2001
- Gauteng Gambling Act No. 4 of 1995
- Income Tax Act No. 58 of 1962
- KwaZulu-Natal Gaming and Betting Act No. 8 of 2010
- Labour Relations Act No. 66 of 1995
- Machinery and Occupational Safety Act No. 6 of 1983
- National Gambling Act No. 7 of 2004
- Occupational Health and Safety Act No. 85 of 1993
- Security Services Act No. 36 of 2004
- Unemployment Insurance Act No. 63 of 2001
- Value-added Tax Act No. 89 of 1991
- Western Cape Gambling and Racing Act No. 4 of 1996

4.3 Categories of information held by the Group and to which access may be requested

Records are retained in respect of various aspects of the Group's operations and are listed below. The right and manner of access to these records will be handled in accordance with the provisions of the Promotion of Access to Information Act and the procedure for requesting access to the records and our right to limit or refuse access thereto is described in the next section of this manual.

Agreements and Contracts

- Agreements with shareholders, officers or directors
- Agreements with contractors and suppliers
- Sale agreements
- Purchase, finance or lease agreements
- Service level agreements
- Various general agreements entered into from time to time in the ordinary course of business

Corporate and Secretarial

- Statutory documents such as, certificates of incorporation, certificates of name changes, certificates to commence business
- Trust Deeds
- Memoranda of Incorporation
- Share registers
- Share certificates
- Minutes and Resolutions passed at general meetings
- Proxy Forms
- Statutory returns to relevant authorities
- Fixed Assets Registers
- Record of Directors' shareholdings
- Register of Directors and Prescribed Officers
- Board meeting attendance registers
- Board and Committee Charters
- Director's key employee licences
- Documents and records relating to Trusts
- Share incentive scheme records
- Corporate structures
- BEE certificates and assessment records by accredited rating agencies

Corporate Social Investment

- Records of the Corporate Social Investments Company
- Corporate Social Investments Company Charter
- Records pertaining to corporate social investment projects and donations

Employee records

- Staff establishment and manpower planning records
- Human Resource policies and procedures
- Records relating to general conditions of employment such as, pension/provident fund benefits, medical aid benefits and incentive schemes (where applicable)
- Records relating to appointments, promotions, dismissals, suspensions and disciplinary action
- Records relating to the Pension and Provident Fund
- Employment equity plan
- Salary and payroll records
- Workplace skills plan and training records
- Key employee licences
- Employee contracts
- Employees' personal details, remuneration and work performance records
- Study assistance and bursary scheme
- Employee Handbook
- Statutory returns to relevant authorities

Financial

- Accounting records, including books of account including journals and ledgers
- Annual Financial Statements including annual accounts, Directors' reports and auditors reports
- Purchase orders, invoices, statements, receipts, vouchers, delivery notes and bills of exchange
- Tax returns
- Banking records
- Supplier and preferential procurement information

Information technology

- Operating Systems
- Telephone exchanges and management systems
- Telephone and data lines
- Software Packages and licences
- Disaster Recovery
- Internal Systems Support and Programming / Development

Insurance

- Insurance policies
- Claim records
- Details of insurance cover and limits

Internal Audit and Risk Management

- Records relating to risk management policies and procedures
- Internal audit plans and reports

Intellectual property

- Trademarks, trade names and protected names
- Copyrights
- Agreements relating to intellectual property such as confidentiality agreements, research and development agreements, consulting agreements, joint venture agreements and joint development agreements;
- Litigation and other disputes involving intellectual property.

Legal and compliance

- Gambling-related licences
- Other material licences, permits and authorisations
- Social Equity reports
- Gambling-related audits
- Gambling-related records
- Statutory signage

Property and equipment

- Asset registers
- Motor vehicle records
- Lease agreements

Sales and marketing

- Promotional and advertising material
- Sales brochures

5. PROCEDURE FOR REQUESTING ACCESS TO THE ABOVE INFORMATION

To request access to any of the categories of information referred to in section 4.3 above –

- (a) Complete the prescribed application form (provided below or downloaded from the SAHRC website referred to above) in full to enable the request to be properly considered;
- (b) Address the application to the designated Information Officer at any of the addresses referred to in section 2 above;
- (c) Pay the applicable prescribed fee which is currently R50.00 (excluding VAT) unless the request is made in a person's personal capacity for access to information personal to the requester.

Please note that:

- additional access fees and fees for the provision of copies may be payable; and
- an application may be refused on the grounds set out in Chapter 4 of the Promotion of Access to Information Act .

The fees and grounds for refusal are prescribed in the Act and details thereof may be downloaded from the SAHRC website.



GRAND PARADE
INVESTMENTS LIMITED

FORM C

(as prescribed in the Regulations Regarding the Promotion of Access to Information)

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000

(Act No. 2 of 2000)

[Regulation 10]

A. Particulars of 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:

Fax number:

Telephone number:

E-mail 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 <i>ONLY</i> if a request <i>for information</i> is made on behalf of <i>another</i> person.
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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 for 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:			
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
2. If record consists of visual images			
this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
<input type="checkbox"/>	view the images	<input type="checkbox"/>	transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
<input type="checkbox"/>	listen to the soundtrack	<input type="checkbox"/>	transcription of soundtrack*
<input type="checkbox"/>	audio cassette	<input type="checkbox"/>	written or printed document
4. If record is held on computer or in an electronic or machine-readable form:			
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	copy in computer readable form* (stiffy or compact disc)
<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?		YES	NO
Postage is payable.			

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 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?

Signed at..... this..... day of20

.....

SIGNATURE OF REQUESTER /

PERSON ON WHOSE BEHALF REQUEST IS MADE