



THE SPAR GROUP LIMITED

Reg. No. 1967/001572/06
("the Company" or "SPAR")

ACCESS TO INFORMATION MANUAL

This manual was prepared in accordance with Section 51 of The Promotion of Access to Information Act, 2000 (the PAIA) and to address the requirements of section 55 of the Protection of Personal Information Act, 2013 (the POPIA) and Regulations relating to the Protection of Personal Information, 2018.

1. POLICY STATEMENT

SPAR is committed to conducting its operations in compliance with all legal and regulatory requirements. This Access to Information Manual (the manual) regulates access to information owned, held by or otherwise under the control of SPAR and the release of any such information or records.

2. APPLICATION

This manual grants access to information held by the Company and its South African subsidiaries. For more information on the Company's South African subsidiaries, requesters are referred to SPAR's latest integrated report, which is available on the Company's website at <https://thespargroup.com/>.

All requests for SPAR information and records shall be made in terms of this manual and will be considered in the light of the relevant sections of the PAIA and the POPIA.

3. OBJECTIVE

The objectives of this manual are to:

- set out the types of information kept by SPAR;
- set out the requirements on how to request information in terms of the PAIA;
- set out the grounds on which a request may be refused; and
- explain the manner and form which a request for information must be submitted.

4. AVAILABILITY OF THE MANUAL

This manual will be made public through the SPAR website at <https://thespargroup.com/> alternatively on request from the Information Officer:

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22 Chancery Lane, Pinetown, 3610
PO Box 1589, Pinetown, 3600
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MANUAL

1. **Introduction**

The PAIA gives effect to the constitutional right to access any information held by any Public or Private Body, subject to certain limitations, in order to enable them to exercise or protect their rights. Conversely, the POPIA affords Data Subjects the right to request access, in accordance with the provision of PAIA, to their Personal Information from a Responsible Party.

The POPIA gives effect to the constitutional right to privacy, in particular, the protection against the unlawful collection, retention, dissemination and use of a Data Subjects Personal Information, subject to justifiable limitations.

2. **Definitions**

“Data Subject: means the person to whom Personal Information relates.

“Personal Information” means information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person.

“Processing” means any activity concerning personal information including collection, receipt, recording, organisation, collation, storage updating, modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution, merging, linking, restriction, degradation, erasure or destruction of information.

Responsible Party means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information.

3. **SPAR Business**

SPAR is a public company listed on The Johannesburg Stock Exchange Limited and invests in subsidiaries, joint ventures and associates. The Company is primarily a wholesaler and distributor of goods and services to SPAR and SaveMor supermarkets, Build it building materials outlets, TOPS at SPAR liquor stores and Pharmacy at SPAR pharmacy and healthcare outlets.

4. **Information held by SPAR**

4.1 **Information available without a request to access**

Records lodged in terms of Government requirements with various statutory bodies, including the Companies and Intellectual Property Commission.

4.2 **Information available in terms of any other legislation**

Requesters may make requests for information that may be requested in accordance with applicable South African legislation.

4.3 Information held by SPAR

SPAR maintains various types and categories of information (i.e. Agreements, Board and Committee reports, Minutes of Meetings, Accounting Records, Personnel Records, Correspondence etc.). Each request for such will be dealt with on a case by case basis.

5. Access to Information held by SPAR

The following procedure must be followed when requesting information:

- 5.1 The request must be sent in the prescribed form attached hereto as **Annexure “A”**.
- 5.2 The request must be submitted to the Information Officer, as per the details above. The Information Officer will process a request within 30 days, unless otherwise required by applicable South African legislation or if the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate that this time period not be complied with.
- 5.3 The requestor must provide proof of identity of the person requesting the record. If the request is made on behalf of another person, the requestor must provide proof of the capacity in which he/she/it is making the request.
- 5.4 Once a request is made, the requestor will receive notice from SPAR to pay the prescribed deposit fee, which must be paid before the request is processed.
- 5.5 The fee schedule can be downloaded from the Department of Justice and Constitutional Development’s website at www.justice.gov.za.

6. Grounds for Refusal to Access Information held by SPAR

SPAR has the right to refuse requests for information that are clearly frivolous or vexatious or which involve an unreasonable diversion of resources. The other main ground on which SPAR has the right in terms of the PAIA and the POPIA to refuse a request for information are the mandatory protection of:

- the privacy of third parties, who is a natural person, which would involve the unreasonable disclosure of Personal Information of that natural person;
- the commercial information of a third party, if the record contains trade secrets, financial commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interest of that third party; and
- information provided in confidence.

7. Administration of this Manual

The custodian of this manual is the Group Secretariat Department who will be responsible for the administration, revision, interpretation and application of this manual, which will be reviewed triennially or as and when required.

Any alteration to this manual is subject to approval by Board/Risk Committee.

This manual was approved by the board on **13 JUNE 2023** and becomes immediately on approval.

PRESCRIBED FORM
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:

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B. Particulars of person requesting access to the record:

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone number:

Email address:

Capacity in which request is made, when made on behalf of another person:

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C. Particulars of person on whose behalf request is made:

Full names and surname:

Identity number:

D. Particulars of record:

1. Description of record of relevant part of the record:

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2. Reference number if available:

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3. Any further particular of record:

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E. Notice of decision regarding request for access

- 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 exception of the payment of any fee, please state the reason for exemption.

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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 request is requested.				
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 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 record consists of visual images				
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		Transcription of the soundtrack* (written or printed document)		
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*
* if you request 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 rights to be exercised or protected

1. Indicate which right to be exercised or protected

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2. Explain why the record request is required for the exercise or protection of the
aforementioned

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H. Notice of decision regarding request for access

How would you prefer to be informed of the decision regarding your request to access to the
record?

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Signed at this day of 20.....

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Signature of request/person on whose
behalf request is made