

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, NO 2 OF 2000**

RELATING TO THE ENTITIES DESCRIBED BELOW

Version: 1.0

Name of Company:

Company Registration Number

Rockwood Private Equity Pty Ltd
Rockwood Fund I GP Pty Ltd

2007/034606/07
2014/108491/07

Name of Partnership:

Rockwood Fund I GP Partnership
Rockwood Fund I Partnership

A. INTRODUCTION

Rockwood Private Equity Proprietary Limited

Rockwood Private Equity Proprietary Limited (the "**Company**") carries on business as a private equity investment firm specialising in advising third party funds and investing alongside management teams, investor groups and entrepreneurs in portfolio companies.

The Company manages Rockwood Fund I (the "Fund"). The Fund is established as an *en commandite*, is controlled by a general partner and has investors in the form of limited partners. Investment and management decisions of the Fund are made by the general partner.

The Company is a financial services provider in South Africa and is authorised under the Financial Advisory and Intermediary Services Act, 37 of 2002 under FSP Number 24503.

B. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

1. Information required in terms of section 51 (A) of PAIA

The head of Company is Mr Andrew Dewar (Managing Director) who has delegated this power to Peter Mason (Legal Counsel) who, for the purpose of this manual, is the information officer.

Contact details of the Information Officer

Postal Address: Private Bag x28, Northlands, Johannesburg, Gauteng, 2116

Physical Address: Inanda Greens Business Park, Building 6, Augusta House, 54 Wierda Road west,
Wierda Valley

Telephone Number: +27 (0) 10 060 4145/4148

Email: rockwood@rockwoodpe.co.za

2. Description of Guide referred to in Section 51(1)(b) ("Guide") of the Promotion of PAIA

The Guide, which provides greater clarity on how to use the Act, is available from the South African Human Rights Commission ("**SAHRC**").

Please direct any queries to:

The South African Human Rights Commission
PAIA Unit
The Research and Documentation Department
Postal address: Private Bag 2700
Houghton
2041

Telephone: +27 11 484 8300

Fax: +27 11 484 7146

Website: www.sahrc.org.za

E-mail: PAIA@sahrc.org.za

3. **Applicable Legislation in terms of Section 51(1)(c) of PAIA**

Records of the Company are kept in accordance with and including, but not limited to, the following legislation:

Basic Conditions of Employment Act 75 of 1997
Collective Investment Schemes Control Act 45 of 2002
Companies Act 61 of 1973
Compensation for Occupational Injuries and Diseases Act 130 of 1993
Constitution of the Republic of South Africa 108 of 1996
Electronic Communications and Transactions Act 25 of 2002
Employment Equity Act 55 of 1998
Financial Intelligence Centre Act 38 of 2001
Financial Advisory and intermediary Services Act 37 of 2002
Income Tax Act 58 of 1962
Labour Relations Act 66 of 1995
Medical Schemes Act 131 of 1998
Pension Funds Act 24 of 1956
Regional Services Council Act 109 of 1985
Skills Development Act 97 of 1998
Skills Development Levies Act 9 of 1999
Unemployment Insurance Act 63 of 2001
Exchange Control Regulations
Income tax Act 95 of 1967
Value added Tax Act 89 of 1991
Close Corporation Act No 69 of 1984
Promotion of Access of Information Act 2 of 2000

4. **Records kept in terms of other legislation in terms of section 51(1)(d) of PAIA**

A description of the records kept in terms of the above section of PAIA is set out in Appendix A. These records are kept at the physical address of the Company.

5. **Information required in terms of section 51(1)(e) of PAIA**

We keep certain records as a matter of standard practice. The subjects and categories of records held are set out in Appendix A.

6. **Right of access to information in terms of section 50 of PAIA**

You will be given access to information if: (i) it is required for the exercise or protection of any of your rights; (ii) you comply with the procedural requirements in PAIA relating to a request for access to that information; and (iii) access to that information is not refused in terms of any ground for refusal in PAIA.

7. **Availability of the manual in terms of section 51(3) of PAIA**

This manual is available for inspection at the offices of the Company. Further copies of this manual are available from the SAHRC and at the website address of the Company (www.rockwoodpe.co.za).

8. **Making a request for information in terms of PAIA**

The process:

8.1 Complete "Request Form-C". This form together with a list of applicable fees is available from the Company. These fees must be paid before access to information will be allowed. You will be informed of the amount of your fees once you have submitted your request.

8.2 Completed forms are to be submitted to us at the Company's physical address or email address.

8.3 Your request will be processed within 30 days provided that the information requested does not relate to a third party and if it is not necessary to grant an extension for the reasons set out below.

8.4 This period may be extended once, for a further 30 days, if:

8.4.1 the request is for a large number of records or requires a search through a large section of records and compliance with the original period would unreasonably interfere with our activities;

8.4.2 the request requires a search for records in, or collection thereof from, an office not situated in the same town or city as the office of the Information Officer and this search cannot reasonably be completed within the original 30 days;

8.4.3 consultation with any private body is necessary or desirable to decide upon the request and this consultation cannot reasonably be completed with the original period; or

8.4.4 more than one of the circumstances contemplated above exist in respect of the request which make compliance with the original period not reasonably possible; or you, as the requester, consent in writing to the extension.

8.5 The Information Officer will as soon as reasonably possible notify you of any extension.

8.6 There are various grounds upon which your request for access to a record may be refused. They are:

8.6.1 you have not complied with section 50 of PAIA;

8.6.2 the protection of personal information of a third party (who is a natural person) from unreasonable disclosure;

8.6.3 the protecting of commercial information of a third party (for example trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);

- 8.6.4 if disclosure of the record would result in the breach of a duty of confidence owed to a third party;
 - 8.6.5 if access to the record would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
 - 8.6.6 if the record was privileged from production in legal proceedings, unless that privilege has been waived;
 - 8.6.7 if the record contains trade secrets, financial or sensitive information or any information what would us at a disadvantage in negotiations or prejudice it in commercial competition; or
 - 8.6.8 if the record contains information about research being carried out or about to be carried out on behalf of a third party or by us.
- 8.7 If your request does affect a third party then we will first need to inform the third party within 21 days of us receiving your request. This means that if the record you request affects any third party in any way, that third party will have to be informed that you are requesting access to the record. The third party then has 21 days to make representations and/or submissions regarding the granting of access to the record.
- 8.8 Once the Information Officer has heard all submissions, he will make a decision as to whether or not access to the record will be granted. You will then be granted access to the record within thirty days of being informed of an affirmative decision.
- 8.9 If the Information Officer does not grant you access to the record you are entitled to appeal the decision. You will receive proper reasons as to why the request was refused. You need to lodge your appeal in the High Court.
- 8.10 If the Information Officer does decide to grant you access to the record, the third party that has been affected has thirty days in which to appeal the decision, also in the High Court. If no appeal is lodged within 30 days, you will be granted access to the record.

SUBJECT AND CATEGORIES OF RECORDS HELD

1) Description of information held in terms of other legislation

Incorporation Documents

Constitution Documents of Rockwood and shareholders agreements

Company Secretarial documents

Partnership agreements

Trust Property Control Act 57 of 1988 related documents

Employment Equity Act 55 of 1998 related documents

2) Description of other records held by us

Financial Records

Banking Details and Banking Facilities

Human Resources Records

Intellectual Property and related records

Insurance Records

Records of Moveable and Immovable Property

Computer systems and Computer programmes

Agreements/Correspondence entered into in the ordinary course of business