



(Company Registration No. 2007/021624/06)

**And those subsidiary companies listed in Annexure 1
(hereinafter collectively referred to as “KPAL”)**

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, NO. 2 OF 2000 ("the Act")**

PART I

Information required under section 51 (1) (a) of the Act

Name of body: Kansai Plascon Africa Limited

Head of body: Mr PR Lalla

Address: **10 Frederick Cooper Drive**

Factoria

Krugersdorp

1739 South Africa

Postal Address: Post Box 4010

Luipaardsvlei

1743 South Africa

All requests for information in terms of the Act should be addressed to the Head of Body, who can be contacted as follows:

Telephone No.: +27(0)11 951 4747

Fax: +27(0)86 639 3359

e-mail: echamberlain@kansaiplascon.co.za

PART II

Information required under section 51 (1) (b) of the Act

As at the time of compiling this manual the guide referred to in this section has not yet been compiled by the Human Rights Commission. The regulations regarding the Promotion of Access to Information Act published under Government Notice No. R187 of 15 February 2002 set forth how the Human Rights Commission should make the guide available.

PART III

Information referred to under section 51 (1) (c) of the Act

The following categories of records will be freely available:

1. Marketing and promotional material published by KPAL
2. All information published on the Kansai Plascon Website (www.kansaiplascon.co.za)

PART IV

Information required under section 51 (1) (d) of the Act

Records are kept in accordance with the following legislation:

- Income Tax Act, 58 of 1962
- Unemployment Insurance Act, 30 of 1966
- Value-Added Tax Act, 89 of 1991
- Compensation for Occupational Injuries and Diseases Act, 130 of 1993
- Labour Relations Act, 66 of 1995
- Basic Conditions of Employment Act, 75 of 1997
- Employment Equity Act, 55 of 1998
- Skills Development Levies Act, 9 of 1999
- Pension Funds Act, 24 of 1956
- Companies Act, 71 of 2008
- National Environmental Management Act, 107 of 1998
- Regional Services Councils Act, 109 of 1985
- Occupational Health and Safety Act, 85 of 1993
- Stock Exchanges Control Act, 1 of 1985
- Trademarks Act, 194 of 1993

PART V

Information required under section 51 (1)(e) of the Act

Personnel records

Personnel refers to any person who works for or provides services to or on behalf of KPAL and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of KPAL. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to KPAL by their personnel;
- Any records that a third party has provided to KPAL about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

Customer-related records

A customer includes any natural or juristic entity that receives services from KPAL. Customer-related information includes the following:

- Any records a customer has provided to a third party acting for or on behalf of KPAL;
- Any records a third party has provided to KPAL; and
- Records generated by or within KPAL pertaining to the customer, including transactional records.

Records pertaining to KPAL

The following are considered to include but not be limited to records that pertain to KPAL's own affairs:

- Financial records;
- Operational records;
- Databases;
- Marketing records;
- Internal correspondence;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of KPAL;
- Software and licensing agreements.

Other Parties

KPAL may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary and associated companies, joint venture companies and service providers. Alternatively, such other parties may possess records that can be said to belong to KPAL.

The following records fall under this category:

- Personnel, customer or KPAL's records which are held by another party as opposed to being held by KPAL; and
- Records held by KPAL pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.



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ANNEXURE 1

Company	Registration No
Earthcote Franchising Company Proprietary Limited	1998/019132/07
Kansai Plascon Africa Limited	2007/021624/06
Kansai Plascon CMA Proprietary Limited	1922/014245/07
Kansai Plascon Proprietary Limited	1945/019549/07
Midas Paints Proprietary Limited	1989/004153/07
Plascon (Coastal) Proprietary Limited	1967/005384/07
Sizwe Paints Proprietary Limited	1996/013765/07
Wheatfields Investments No 191 Proprietary Limited	2002/031691/07