

GRAND PARADE INVESTMENTS LIMITED ("GPI")
and its subsidiaries
(collectively "the GPI Group")

MANUAL ON ACCESSING INFORMATION OF THE GPI GROUP
(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 main board of the Johannesburg Stock Exchange. The company and its subsidiaries are private bodies for purposes of the Act.

The GPI Group's investment portfolio comprises of investments in the gambling and food industries; and related services.

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. A list of the nominated subsidiaries and associated companies in the GPI Group is available for inspection at the Group's offices at the address 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>10th Floor 33 on Heerengracht 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

The Act makes provision for a person (requester) to obtain access to the records of a company if that record is required for the exercise or protection of a right. A public body is similarly entitled to lodge a request to obtain access to the records of a company if the public body is acting in the public interest.

The South African Human Rights Commission ("SAHRC") has published a Guide 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 by email request to paia@sahrc.org.za or from 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 Categories of 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, promotional or sales brochures
- Annual and Interim Financial Statements/Reports
- Company website - www.grandparade.co.za
- SENS announcements

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, as amended
- Broad Based Black Economic Empowerment Act No. 53 of 2003 , as amended
- Companies Act No. 71 of 2008, as amended
- Employment Equity Act No. 55 of 1998, as amended
- Financial Intelligence Centre Act No. 38 of 2001, as amended
- Financial Markets Act, No 19 of 2012, as amended
- Gauteng Gambling Act No. 4 of 1995, as amended
- Income Tax Act No. 58 of 1962, as amended
- KwaZulu-Natal Gaming and Betting Act No. 8 of 2010, as amended
- Labour Relations Act No. 66 of 1995, as amended
- Machinery and Occupational Safety Act No. 6 of 1983, as amended
- Mpumalanga Gambling Act No 5 of 1995, as amended
- National Gambling Act No. 7 of 2004, as amended
- Occupational Health and Safety Act No. 85 of 1993, as amended
- Unemployment Insurance Act No. 63 of 2001, as amended
- Value-added Tax Act No. 89 of 1991, as amended
- Western Cape Gambling and Racing Act No. 4 of 1996, as amended

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 GPI Group's operations, details of which are listed below. The right and manner of access to these records will be handled in accordance with the provisions of the 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.

Corporate and Company Secretarial:

- Statutory documents
- Minutes and Resolutions passed at general meetings

- Statutory returns to relevant authorities
- Record of Directors' shareholdings
- Register of Directors and Prescribed Officers
- Board meeting attendance registers
- Board and Committee Charters
- Licences
- Leases
- Title deeds
- Organogram
- BEE certificates
- Correspondence and Circulars to shareholders
- Trademarks, trade names and protected names

Human Resources:

- Human Resource policies and procedures
- Employee records
- Remuneration and benefits
- Training schedules and material
- Occupational Health and Safety records
- Employment equity plan and reports
- Key employee licences
- Study assistance and bursary scheme
- Employee Handbook
- Statutory returns to relevant authorities

Financial:

- Financial reports/records
- Management reports/records
- Tax records
- Legal records
- Annual audited Financial Statements
- Procurement information
- Insurance policies

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 available for download on the SAHRC website referred to above) in full to enable the GPI Group to identify the record being requested, the name (or capacity) of the requester and the form of access required.
- (b) Provide details of the right which the requester is seeking to exercise or protect, together with an explanation as to why the specific record being requested is required to exercise or protect the right.
- (c) Provide proof of identity in a legally acceptable form to authenticate the request and the requester and if an agent is making the application, provide proof of capacity in which acting.
- (d) Address the application to the Company Secretary at any of the addresses referred to in section 2 above.

- (e) Pay the applicable prescribed fee which is currently R50.00 (excluding VAT) in order for the request to be processed. Additional fees may also be payable depending on the nature of the request and in some instances (i.e. where the request is made in a person's personal capacity for access to information personal to the requester) the fees may be waived. Further details of the fees payable are available at: <http://www.sahrc.org.za>

Please note that an application may be refused on the grounds set out in Chapter 4 of the Promotion of Access to Information Act.

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: Grand Parade Investments Limited/GPI Group

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"/> copy of the images"	<input type="checkbox"/> transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:		

	listen to the soundtrack audio cassette		transcription of soundtrack* written or printed document
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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* (stiffy or compact disc)
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'If you requested 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 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