



**MANUAL OF REDEFINE PROPERTIES LIMITED
("REDEFINE")**

Registration number: 1999/018591/06

**Prepared in accordance with Section 51 of the Promotion of
Access to Information Act, No 2 of 2000 ("the Act")**

Last updated 23 December 2015





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1. INTRODUCTION AND SCOPE

Redefine Properties Limited is a real estate investment trust listed on the Johannesburg Stock Exchange. It derives rental income from investments in:

- office, retail and industrial properties;
- distributions from listed security investments; and
- income from properties developed for trading

Redefine was listed on the 'Financial – Real Estate' sector of the Johannesburg Stock Exchange on the 23rd of February 2000.

The scope of this manual includes Redefine Properties Limited and the following related entities which Redefine has a direct interest:

Registered Company Name	Company Registration Number	Incorporation
Holding Company		
Redefine Properties Limited	1999/01859/06	South Africa
Wholly Owned Subsidiaries		
Redefine Retail (Pty) Ltd	2012/079189/07	South Africa
Redefine Property Management (Pty) Ltd	2012/079185/07	South Africa
Fountainhead Property Administration (Pty) Ltd (formerly Evening Star Trading 768 (Pty) Ltd)	2007/022262/07	South Africa
Fountainhead Property Trust Management Ltd	1983/003324/06	South Africa
Redefine Global (Pty) Ltd	2013/175606/07	South Africa
Madison Property Fund Managers Holdings Limited	2003/021772/06	South Africa
Madison Property Fund Managers Ltd	2005/021874/06	South Africa
Annuity Properties Limited	2011/145994/06	South Africa
Annuity Property Managers (Pty) Ltd	2011/000217/07	South Africa
Annuity Asset Managers (Pty) Ltd	2004/017747/07	South Africa
Redefine Pacific	117350 C2/GBL	Mauritius
Redefine Australia (Pty) Ltd	ACN 167262311	Australia
Leaf Property Fund (Proprietary) Limited	2012/089838/07	South Africa
Erf 2/49 Bryanston (Proprietary) Limited	1993/005155/07	South Africa
Any Name 621 (Proprietary) Limited	2010/017182/07	South Africa
Observatory Business Park (Proprietary) Limited	2001/020483/07	South Africa

Black River Park Investments (Proprietary) Limited	1999/016947/07	South Africa
The Property Management Team (Proprietary) Limited	2013/235235/07	South Africa
S&J Land Investments (Proprietary) Limited	1947/026115/07	South Africa
Simmer and Jack Land Development Company (Proprietary) Limited	1969/006736/07	South Africa
Simmer Extensions (Proprietary) Limited	1894/000844/07	South Africa
Partridge Investments Limited	13245	British Virgin Islands
Leopard Holding	152.771	Luxembourg

2. CONTACT DETAILS (Section 51(1)(a))

The following are executive directors and duly authorised persons of RedeFINE:

- Andrew Konig (Chief Executive Officer)
- Leon Kok (Financial Director)
- David Rice (Chief Operating Officer)

Internet address: www.redefine.co.za

Postal address: PO Box 1731, Parklands 2121

Physical address: RedeFINE Place, 2 Arnold Road, Rosebank, 2196

Telephone number: (011) 283 0000

Email address:

- Andrew Konig (Chief Executive Officer) – andrewk@redefine.co.za
- General information – enquiries@redefine.co.za

3. GUIDE FOR REQUESTERS ON HOW TO USE THE ACT (Section 51(1)(b))

A guide has been compiled in terms of Section 10 of the Act by the Human Rights Commission. It contains information to assist a person wishing to exercise a right, in terms of the Act. The Guide is available for inspection, inter alia, as follows:

The South African Human Rights Commission: PAIA Unit

Internet address: www.sahrc.org.za

Postal address: Private Bag 2700, Houghton, 2041

Physical address: 29 Princess of Wales Terrace, corner York and St Andrews Street, Parktown

Telephone number: (011) 484 8300

Fax number: (011) 484 0582

Email address: PAIA@sahrc.org.za

4. RECORDS AUTOMATICALLY AVAILABLE TO THE PUBLIC (Section 51(1)(c))

Annual Reports	Available on website www.redefine.co.za
Interim Reports	Available on website www.redefine.co.za
Investment analyst presentations	Available on website www.redefine.co.za

5. RECORDS HELD IN ACORDANCE WITH OTHER LEGISLATION (Section 51(1)(d))

Basic Conditions of Employment Act No. 75 of 1997	Occupational Health and Safety Act No 85 of 1993
Companies Act No 71 of 2008	Pension Funds Act No 24 of 1956
Compensation for Occupational Injuries and Health Diseases Act No 130 of 1993	Skills Development Levies Act No 9 of 1999
Consumer Affairs (Unfair Business Practices) Act No 71 of 1988	Skills Development Act No 97 of 1998
Copyright Act No 98 of 1978	Trade Marks Act No 194 of 1993
Employment Equity Act No 55 of 1998	Unemployment Contributions Act No 4 of 2002
Harmful Business Practices Act No 23 of 1999	Unemployment Insurance Act No 63 of 2001
Income Tax Act No 95 of 1967	Value Added Tax Act No 89 of 1991
Intellectual Property Laws Amendments Act No 38 of 1997	Electronic Communications and Transactions Act No 37 of 2007
Labour Relations Act No 66 of 1995	Promotion of Access of Information Act No 37 of 2007

6. RECORDS HELD THAT MAY BE REQUESTED (Section 51(1)(e))

ADMINISTRATION	Policies and procedures
	Internal correspondence (including meetings of meetings) not marked confidential
	Risk, security and insurance records
STATUTORY RECORDS	Incorporation documents
	Memorandum of incorporation
	Minutes of shareholder meetings
	Records relating to the appointment of Directors, Auditors, Secretary, Public Officer and any other Officer
	Share register and other statutory registers
	Statutory returns to relevant authorities
FINANCIAL RECORDS	Accounting records
	Banking records
	Invoices and statements
	Management reports
	Tax records and returns
	Rental agreements
	SARB returns
	Statistics SA Returns
	VAT returns
	BEE Statistics
HUMAN RESOURCES	Career development records
	Disciplinary code
	Employment contracts

	Employment equity reports and plans
	Recruitment policies
	Remuneration records and policies
	Retirement benefits and medical aid records
	SETA records
	Training records and skills development plans
	PAYE, UIF and WCA returns
INFORMATION MANAGEMENT AND TECHNOLOGY	Contracts agreements with service providers
	Information policies, procedures and guidelines
MARKETING AND COMMUNICATION	Brand information management
	Marketing and communication strategies
	Client relationship programs
	Marketing brochures

7. ACCESS REQUEST PROCEDURE (Section 51(1)(e))

It is important to note that the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 Chapter 4 of the Act. If it is reasonably suspected that the requester has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such a requester.

COMPLETION AND SUBMISSION OF THE ACCESS REQUEST FORM (FORM C)	The prescribed form must contain sufficient particularity in order to enable the Chief Executive Officer to identify:- <ul style="list-style-type: none"> - the records requested; - the identity of the requester; - which form of access is required; and - the postal address or fax number of the requester in the Republic of South Africa
	The requester must identify the right that the requester is seeking to protect.
	The requester must provide an explanation of why the requested record is required for the exercise or protection of any right.
	If in addition to a written reply, the requester wishes to be informed of the decision in respect of the request in any other manner, the requester must state the manner in which it wishes to be informed.
	If the request is made on behalf of another person, then the requester must submit proof of the capacity in terms of which the requester is making the request, to the reasonable satisfaction of the Chief Executive Officer.
	Form C is available on the website of the SAHRC (contact details above).
PAYMENT OF FEES	The fee is not applicable to personal requesters (referring to any person seeking access to records that contain their personal information).
	The requester must pay the prescribed request fee of R57 (incl. VAT) (if applicable) before any further processing can take place.
NOTIFICATION	Redefine will within 30 days of receipt of the request decide

	whether to grant or decline the request and give notice with reasons (if required) to that effect.
	The 30 day period within which Redefine has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days, if the request is for a large volume of information or requires Redefine to search through a large volume of records or the records are not kept at the offices of Redefine.
	Redefine will notify the requester in writing should an extension be sought.

8. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS (Chapter 4)

The main grounds for refusal of a request for information are:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of commercial information of a third party, if the record contains:-
 - o trade secrets of that third party;
 - o financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - o information disclosed in confidence by a third party to Redefine, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- Mandatory protection of confidential information if the disclosure would constitute a breach of a duty or confidence to a third party in terms of any agreement;
- Mandatory protection of the safety of individuals and the protection of safety of property;
- Mandatory protection of records which would be regarded as privileged in legal proceedings;
- The protection of the commercial activities of Redefine, which includes:-
 - o trade secrets of Redefine;
 - o financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Redefine; and
 - o information which if disclosed could put Redefine at a disadvantage in negotiations or commercial competition;
 - o a computer program which is owned by Redefine, and which is protected by copyright; and
- The research information of Redefine or a third party on behalf of Redefine, if the disclosure would expose the third party, Redefine or the researcher of the subject matter of the research to a serious disadvantage.