

PO Box 51318, Cape Town, 8002
1 Silo Square, V&A Waterfront, Cape Town, 8001
Tel: +27 21 415 2300; Fax: +27 21 415 2400
Internet site: www.allangray.co.za

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000, FOR THE FOLLOWING ENTITIES:

- Allan Gray (Botswana) (Proprietary) Limited
- Allan Gray Bermuda Limited
- Allan Gray Capital Proprietary Limited
- Allan Gray Group Proprietary Limited
- Allan Gray International Proprietary Limited
- Allan Gray Investment Management Nigeria Limited
- Allan Gray Investment Services Proprietary Limited
- Allan Gray Kenya Limited
- Allan Gray Life Limited
- Allan Gray Namibia (Proprietary) Limited
- Allan Gray Namibia Unit Trust Management Limited
- Allan Gray Nominees (RF) Proprietary Limited
- Allan Gray Pension Preservation Fund
- Allan Gray Proprietary Limited
- Allan Gray Provident Preservation Fund
- Allan Gray Retirement Annuity Fund
- Allan Gray South Africa Proprietary Limited
- Allan Gray Swaziland (Proprietary) Limited
- Allan Gray Unit Trust Management (RF) Proprietary Limited
- Black Entrepreneurship and Empowerment Proprietary Limited
- Allan Gray Frontier Markets Equity Fund Limited
- Allan Gray Umbrella Provident Fund
- Allan Gray Umbrella Pension Fund

CONTENTS

A. INTRODUCTION TO ENTITIES

B. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

1. Contact details
2. The section 10 Guide on how to use the Act
3. Types of Records
 - (a) Records available in terms of any other legislation
 - (b) Records available without requesting access in terms of the Act
 - (c) Records available on request
4. Requesting procedures
5. Availability of the manual

A.INTRODUCTION TO ENTITIES

Allan Gray Unit Trust Management (RF) Proprietary Limited, Allan Gray Life Limited, Allan Gray South Africa Proprietary Limited and Allan Gray Investment Services Proprietary Limited are wholly owned subsidiaries of Allan Gray Proprietary Limited. Allan Gray Nominees (RF) Proprietary Limited is wholly owned by Allan Gray Investment Services Proprietary Limited. Allan Gray Capital Proprietary Limited, Allan Gray International Proprietary Limited, Allan Gray Namibia (Proprietary) Limited, Allan Gray Namibia Unit Trust Management Limited, Allan Gray (Botswana) (Proprietary) Limited, Allan Gray Swaziland (Proprietary) Limited, Allan Gray Investment Management Nigeria Limited, Allan Gray Proprietary Limited, Allan Gray Kenya Limited and Allan Gray Bermuda Limited, Allan Gray Frontier Markets Equity Fund Limited are the subsidiary companies of the holding company, Allan Gray Group Proprietary Limited.

Allan Gray Proprietary Limited, Allan Gray South Africa Proprietary Limited, Allan Gray International Proprietary Limited and Allan Gray Life Limited are registered by the Financial Services Board ('FSB') as authorised Financial Services Providers. Allan Gray Investment Services Proprietary Limited is registered by the FSB as an authorised administrative Financial Services Provider and Allan Gray Nominees (RF) Proprietary Limited as its Nominee Company. Allan Gray Unit Trust Management (RF) Proprietary Limited is registered with the FSB as a collective investment management company.

Allan Gray Proprietary Limited is the sponsor of the Allan Gray Pension Preservation Fund, Allan Gray Provident Preservation Fund, Allan Gray Retirement Annuity Fund, Allan Gray Umbrella Provident Fund and Allan Gray Umbrella Pension Fund. Allan Gray Investment Services Proprietary Limited is the duly appointed administrator for the Allan Gray Pension Preservation Fund, Allan Gray Provident Preservation Fund, Allan Gray Retirement Annuity Fund, Allan Gray Umbrella Provident Fund and Allan Gray Umbrella Pension Fund.

The head of Allan Gray Group Proprietary Limited has tasked the Group Legal and Compliance Department to attend to all matters relating to this Act.

B.PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

This manual has been compiled in accordance with the Promotion of Access to Information Act 2 of 2000 (the Act) and applies to all the identified entities.

1. Contact details

Allan Gray Proprietary Limited will deal with all requests relating to any of the entities. All requests for information in terms of this manual should be directed to:

Head of Group Legal & Compliance

Allan Gray Proprietary Limited
PO Box 51318
CAPE TOWN
8002

1 Silo Square
V&A Waterfront
CAPE TOWN
8001

Telephone: +27 21 415 2300
Fax: +27 21 415 2400

2. The section 10 Guide on how to use the Act

Should you require greater clarity on or assistance with the Act, we refer you to the Guide that has been published by the South African Human Rights Commission ('SAHRC') in terms of section 10 of the Act. It includes:

- (a) what the objects of this Act are;
- (b) the relevant contact details of each public and private body (where possible);
- (c) the process that needs to be followed in order to request access to records;
- (d) assistance available from the SAHRC and information officers of public bodies;
- (e) how to get access to the manual of a private body;
- (f) all the remedies available in law to you; and
- (g) details on prescribed fees payable in respect of requests for information.

This Guide will be made available in such official language as may reasonably be required by a person who wishes to exercise any right contemplated in the Act.
Please direct any queries to:

**The South African Human Rights Commission
PAIA Unit
The Research and Documentation Department**

Postal address: Private Bag X2700
HOUGHTON
2041

Telephone: +27 11 877 3803

Fax: +27 11 403 0625

Website: www.sahrc.org.za

E-mail: PAIA@sahrc.org.za

3. Types of Records

(a) Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to any of the entities listed in this manual and the financial services industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

(b) Records available without requesting access in terms of the Act

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the Gazette.

The identified entities have not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at www.allangray.co.za.

(c) Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in the Act, available for the purposes of the Act:

Records are held on the following subjects:

- (i) Personnel records;
- (ii) Client-related records;
- (iii) Private body records; and
- (iv) Records in the possession of or pertaining to other parties.

(i) Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the private body. 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 the private body by their personnel;

- Any records a third party has provided to the private body 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.

(ii) Client-related records

A client includes any natural or juristic entity, who receives services from the private body. Client-related information includes the following:

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

(iii) Private body records

The following are considered to include but not be limited to records, which pertain to the private body's own affairs:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

(iv) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers. Alternatively, such other parties may possess records, which can be said to belong to the private body.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body 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.

4. Requesting procedures

A person who wants access to the records of any of the identified entities must complete the necessary request form.

The request form can be accessed on www.allangray.co.za or www.sahrc.org.za. If a person needs assistance to obtain the form or on any other matter, please contact the Information Officer at the telephone number provided in paragraph 1.

The completed request form must be sent to the address or fax number provided in paragraph 1 and marked for the attention of the Information Officer.

The Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on www.allangray.co.za.

All the pertinent sections must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

NOTE: Access to certain records may be or must be denied on the grounds set out in the Act.

Mandatory grounds for refusal include but are not limited to:

- (a) Information for the protection of the privacy of individuals;
- (b) Information for the protection of commercial information and confidential information of third parties;
- (c) Information privileged from production in legal proceedings;
- (d) Commercial information of the company; and
- (e) Research information.

5. Availability of the manual

Copies of this manual are available for inspection, free of charge, at the offices of Allan Gray Proprietary Limited. Copies are also available from the South African Human Rights Commission and on our website (www.allangray.co.za).

00oo00