



ILS Promotion of Access to Information Act (“PAIA”) Manual

Prepared in terms of the Promotion of Access to Information Act 2 of 2000 (as amended).

Includes Annexure A: Form 2 (Request for Access of a Record) and Annexure B: Form 3 (Outcome of request and fees payable) from the Information Regulator.

Industrial Logistic Systems (Pty) Ltd			
Document Control No.	ILS Promotion of Access to Information Act (“PAIA”) Manual_v6.0	Date Compiled / Reviewed	March 2026
Page Number	Page 1 of 15	Next Review Date	March 2027
Policy Owner	Information Officer	Approved by	Board of Directors

Table of Contents

1.	Definitions and Acronyms	3
2.	Right of Access to Information	3
2.1	Introduction	3
2.2	Purpose of this Manual.....	3
2.3	Availability of this Manual	3
2.4	Contact Details of ILS Information Officer.....	4
2.5	Policy on Confidentiality and Access.....	4
2.6	Information Regulator Guide on PAIA	4
3.	Classes of Records	5
3.1	Records Automatically Available.....	5
3.2	Legislative Requirements	5
3.3	Subjects and Categories of Records Held	6
4.	Access Procedure and Requests.....	8
4.1	Purpose.....	8
4.2	Completion of Prescribed Access Form	8
4.3	Submission of Request	8
4.4	Payment of Prescribed Fees.....	9
4.5	Notification of Decision	9
4.6	Records Not Found or Non-Existence.....	10
5.	Grounds for Refusal of Access and Remedies	10
5.1	Grounds for Refusal (Chapter 4, PAIA)	10
5.2	Judicial Remedy / Appeal.....	10
6.	Prescribed Fees	11
6.1	Reproduction Fees	11
6.2	Request Fee.....	11
6.3	Access Fee	11
6.4	Postage Fee	11
7.	Processing and Sharing of Personal Information (POPIA)	12
7.1	Sharing of Personal Information	12
7.2	Security Measures	12
7.3	Transborder Information Flows	12
7.4	Purpose of Processing	12
7.5	Categories of Personal Information.....	13
8.	Annexures.....	15
8.1	Annexure A - Form 2: Request for Access to a Record.....	15
8.2	Annexure B - Form 3: Outcome of Request and Fees Payable	15

1. Definitions and Acronyms

“DIO”	Deputy Information Officer - person designated to assist the IO
“ILS”	Industrial Logistic Systems - the Private Body
“IO”	Information Officer - head of ILS who’s responsible for PAIA requests
“PAIA”	Promotion of Access to Information Act 2 of 2000 (as amended)
“POPIA”	Protection of Personal Information Act 4 of 2013
“Record”	Any recorded information in any form held by ILS
“Regulator”	Information Regulator of RSA - PAIA and POPIA oversight
“Requester”	Person making a request for access to a record in terms of PAIA

2. Right of Access to Information

2.1. Introduction

The Promotion of Access to Information Act, 2 of 2000 (“PAIA”), gives effect to this Constitution of the Republic of South Africa, which provides that everyone has the right of access to information held by the State, another person or a body, to exercise or protect their rights. It is intended to promote transparency, accountability and effective governance by regulating the manner in which access to records is requested and granted, subject to justifiable limitations.

Requests must be made in the prescribed manner, using the correct forms, and are subject to timeframes, procedural requirements and regulated fees.

PAIA operates alongside the Protection of Personal Information Act, 4 of 2013 (“POPIA”). Requests for access to personal information and the processing of such information must be handled in a manner that ensures compliance with both PAIA and POPIA.

2.2. Purpose of this Manual

This Manual, prepared in accordance with Section 51 of the Act, serves to:

- Facilitate requests for access to records held by ILS
- Identify the Subjects and Categories of records held by ILS
- Detail procedures to be followed and criteria to be met when requesting access
- Confirm the categories of records automatically available
- Provide details on the processing of Personal Information in accordance with POPIA

2.3. Availability of the ILS PAIA Manual

The Manual is available to the public in PDF format on the ILS website at www.ils.co.za, or on request from the Information Officer or Deputy Information Officer. Reproduction fees will be applicable for printed copies.

2.4. Contact Details of the Information Officer: Sec 51 (1) (a)

- 2.4.1. The Information and Deputy Information Officers will handle all requests on ILS's behalf and ensure that the requirements of the Act are administered in a fair, objective and unbiased manner.

Company: Industrial Logistic Systems Proprietary Limited
Reg. Number: 1987/005223/07
Address: Waterfall Office Park
2 Augrabies Road
Waterfall North
Midrand
1685
Tel: +27 11 656 1100
Information Officer: Clayton Thomas
Email: clayton@ils.co.za
Deputy IO: Ilze Blackmore-Reed
Email: ilze@ils.co.za

2.5. Policy on Confidentiality and Access to Information

- 2.5.1. ILS will protect the confidentiality of information provided to it by third parties, subject to its obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information. If access is requested to a record that contains information about a third party, ILS is obliged to attempt to contact this third party to inform them of the request.

- 2.5.2. This enables the third party the opportunity of responding by either consenting to the access or providing reasons why the access should be denied. In the event that that third party provides reasons for the denial of access, the Information Officer will consider these reasons in determining whether access will be granted or not.

2.6. Information Regulator Guide on PAIA: Sec 51 (1) (b)

- 2.6.1. The Regulator has made available (terms of Section 10) a Guide on how to use PAIA in an easily comprehensible form and manner to requesters. It can be found on the their website in all 11 official languages, <http://infoeregulator.org.za/paia>.

- 2.6.2. **The Information Regulator of South Africa** is based at:

Woodmead North Office Park
54 Maxwell Drive
Woodmead
Johannesburg

General Enquiries: enquiries@infoeregulator.org.za
Complaints: POPIAComplaints@infoeregulator.org.za
PAIAComplaints@infoeregulator.org.za

3. Classes of Records

3.1. Records Automatically Available: Sec 51 (1) (c)

3.1.1. ILS makes the following categories of records available without a formal PAIA request, subject to reasonable administrative arrangements and reasonable reproduction costs where applicable.

- Public website information and published content (www.ils.co.za)
- Company profile / service descriptions (public-facing)
- Public notices and contact information
- Published policies intended for public access (where applicable)

3.2. Legislative Requirements: Sec 51 (1) (d)

3.2.1. Records are kept in accordance with other legislation as applicable to ILS, which includes, but are not limited to:

- Banks Act 94 of 1990
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Civil Proceedings Evidence Act, 1965 (Act 25 of 1965)
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of South Africa Act 108 of 1996
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1987
- Criminal Procedure Act 51 of 1977
- Customs and Excise Act, 1964
- Deeds Registries Act 57 of 1937
- Debt Collectors Act 114 of 1998
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Finance Act 2 of 2007
- Income Tax Act 58 of 1962
- Insider Trading Act 135 of 1998
- Insolvency Act 24 of 1936
- Intellectual Property Laws Amendment Act 38 of 1997
- Labour Relations Act 66 of 1995
- Long Term Insurance Act 52 of 1998
- Magistrates Court Act 32 of 1944
- Non-Profit Organisations Act 71 of 1997
- Occupational Health and Safety Act 85 of 1993
- Patents Act 57 of 1987
- Pension Funds Act 24 of 1956

- Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communication and Provision of Communication Related Information Act 70 of 2002
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Short Term Insurance Act 53 of 1998
- South African Reserve Bank Act 90 of 1989
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

3.2.2. Access remains subject to PAIA, POPIA (where personal information is involved), and applicable lawful limitations.

3.3. Subjects and Categories of Records Held: Sec 51 (1) (e)

3.3.1. Corporate and Governance:

- Incorporation documents
- Statutory records
- Operational records (correspondence, minutes of meetings)
- Intellectual property
- Legal compliance records
- Share certificates
- Policies and procedures
- Advertising and marketing material (including Brand CI)

3.3.2. Finance and Taxation:

- Accounting records
- Annual financial statements
- Audit reports
- Asset registers
- Bank records and statements
- Debtors and Creditors statements, invoices and payments
- General ledgers
- General reconciliations
- Rental agreements
- Tax records and returns
- VAT

3.3.3. Human Resources:

- Employment contracts
- Employee information

- Remuneration and Benefits details
- Performance records
- Disciplinary records
- Training records
- UIF and PAYE returns

3.3.4. Operations and Service Delivery:

- Client proposals
- Statements of work
- Non-disclosure agreements
- Deliverables
- Reports
- Project documentation
- Technical design documentation

3.3.5. Procurement and Suppliers:

- Supplier onboarding files
- Due diligence
- Contracts
- Non-disclosure agreements
- Service level agreements

3.3.6. IT, Information Security and Systems:

- Hardware and software agreements
- Licenses
- IT policies and procedures
- Configuration documents
- Incident records (where applicable)
- Access/activity logs (subject to lawful restrictions)

3.3.7. Legal and Compliance:

- Contracts
- Legal correspondence (including privileged records)
- Compliance certificates
- Insurance records

4. Access Procedure and Requests

4.1. Purpose

The purpose of this section is to provide requesters with guidelines and procedures to facilitate a request for access to a record held by ILS.

It is important to note that an application for access to information can be refused in the event that it does not comply with procedural requirements of the Act. In addition, 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 record falls within a certain category as specified within Part 3, Chapter 4 of the Act.

If it is reasonably suspected that the requester obtained access to ILS's records through the submission of materially false or misleading information, legal proceedings may be instituted against the requester.

4.2. Completion of Prescribed Access Form: Sec 51 (1) (e)

4.2.1. The requester needs to complete the prescribed access Form 2, which can be found in this manual. Please take note that the form must be completed in full; failure to do so will result in the process being delayed until such additional information is provided.

4.2.2. ILS will not be held liable for delays due to the receipt of incomplete or incorrect forms. Please take note of the following instructions when completing the Access Request Form, because the Information Officer shall not process any request for access to a record until satisfied that all requirements have been met:

- a) The form must be completed in the English language.
- b) Proof of identity is required to authenticate the requester's identity. If the requester is an agent or third-party requester, they shall provide proof of identity of the person on whose behalf the request is made, the authority or mandate given to the requester by such person and proof of the identity of the requester as provided above.
- c) Type or print in BLOCK LETTERS an answer to every question.
- d) If a question does not apply, state "N/A" in response to that question.
- e) If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.
- f) If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional attached folio.
- g) When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

4.3. Submission of Request

4.3.1. The completed form and supporting documents must be submitted to the Information Officer via email, post or physical delivery, details of which are provided in 1.4.1 of this manual.

4.4. Payment of Prescribed Fees

4.4.1. Payment details can be obtained from the Information Officer, and payment can be made via a direct deposit (EFT). No credit card or cash payments are accepted. Proof of payment must be supplied. Four types of fees are provided for in terms of the Act:

- *Request Fee:*
An initial, non-refundable fee payable on submission. This is not applicable to Personal Requesters (any person seeking access to a record containing their personal information.)
- *Reproduction Fee:*
This fee is payable with respect to all records that are automatically available.
- *Access Fee:*
If the request for access is successful, an access fee may be required to reimburse ILS for the costs involved in the search, reproduction and/or preparation of the record and will be calculated based on the Prescribed Fees.
- *Deposit:*
A deposit of one-third (1/3) of the access fee is payable if ILS receives a request for access to information held on a person other than the requester himself/herself, and the preparation of the record will take more than six (6) hours. In the event that access is refused to the requested record, the full deposit will be refunded to the requester.

4.5. Notification of Decision

4.5.1. ILS will, within thirty (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.

4.5.2. The thirty (30) day period may be extended for a further period of not more than thirty (30) days, if the request is for large volume of information and the information cannot be reasonably obtained within the original thirty (30) day period. ILS will notify the requester in writing should an extension be sought.

4.5.3. If a request for access to a record is successful, the requester will be notified of the following:

- The amount of the access fee payable upon gaining access to the record;
- An indication of the form in which the access will be granted; and
- Notice that the requester may lodge an application with a court against the payment of the access fee and the procedure, including the period, for lodging the application.

4.5.4. If the request for access to a record is unsuccessful, the requester will be notified of the following:

- Adequate reasons for the refusal (refer to Grounds for Refusal); and
- That the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

4.6. Records Not Found or Non-Existence

- 4.6.1. If ILS has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of affidavit or affirmation.

5. **Grounds for Refusal of Access and Remedies**

5.1. Grounds for Refusal (Chapter 4, PAIA)

The thirty (30) day period within which the Information Officer is required to reply to a request, as stipulated in the Act, shall commence only once a requester has complied with all the requirements in requesting access to a record.

- 5.1.1. Requests may be refused on the following grounds, as set out in the Act:

- Mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of commercial information of a third party or ILS, if the record contains:
 - Trade secrets of the third party or ILS;
 - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or ILS; and
 - Information disclosed in confidence by a third party to ILS if the disclosure could put that third party to a disadvantage or commercial competition.
- Mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement;
- Mandatory protection of the safety of individuals, and the protection of property;
- Mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and
- Mandatory protection of research information of a third party and of ILS.

5.2. Judicial Remedy / Appeal

- 5.2.1. If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, they may, within thirty (30) days of notification of the Information Officer's decision, apply to court for appropriate relief.

6. Prescribed Fees

6.1. Reproduction Fees

The applicable fees (excluding VAT) for reproduction are:

Category	Rand
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic form	0.75
For a copy in a computer-readable form: Compact disc	70.00
A transcription of visual images, for an A4-size page or part thereof	40.00
i. For a copy of the visual images	60.00
ii. A transcription of an audio record, for an A4-size page or part thereof	20.00
iii. For a copy of an audio record	30.00

6.2. Request Fee

A request fee of R50.00 (excluding VAT) is payable upfront where a requester submits a request for access to information on anybody else.

6.3. Access Fee

The applicable fees (excluding VAT) which will be payable are:

Category	Rand
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic form	0.75
For a copy in a computer-readable form: Compact disc	70.00
A transcription of visual images, for an A4-size page or part thereof	40.00
For a copy of visual images	60.00
A transcription of an audio record, for an A4-size page or part thereof	20.00
For a copy of an audio record	30.00

6.4. Postage Fee

Where a copy of the record needs to be posted the actual postal fee is payable in addition to the applicable fees.

7. Processing and Sharing of Personal Information (POPIA)

7.1. Sharing of Personal Information:

ILS may share Personal Information with:

- Service providers who perform services on behalf of ILS; and
- Third party suppliers

7.2. Security Measures

7.2.1. ILS takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect personal information. ILS has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

7.2.2. ILS will take steps to ensure that third party providers who process personal information on behalf of ILS apply adequate safeguards as required in terms POPIA.

7.3. Transborder Information Flows

7.3.1. ILS may from time to time transfer personal information to another country for the purposes of rendering services to employees and customers. ILS will take the necessary steps to ensure that service providers and third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

7.4. Purpose of Processing

7.4.1. ILS processes Personal Information, which includes but it is not limited to the following purposes:

- Employee administration
- Rendering of services to our clients
- Transacting with our suppliers
- Maintaining client, supplier, service provider and third party records
- Recruitment purposes and internships
- Travel purposes
- General administration
- Financial and tax purposes
- Legal purposes
- Health and safety purposes
- Visitor access monitoring purposes
- Investigating of and preventing fraud
- Responding to website enquires

7.5. Categories of Personal Information

Categories of Individual and Juristic Entities	Categories of Personal Information Held	Availability
Employees	<ul style="list-style-type: none"> • Name • Surname • ID number • Contact details • Physical and postal address • Date of birth • Age • Nationality • Disability information • CV's (including education and employment history) • Criminal/background checks • Banking details • Income tax number • Remuneration and benefit information (including medical aid, provident fund and life/risk cover) • Employee contracts • Employee performance records • Training records • Disciplinary procedures • Health and safety records • Physical access records • Electronic access records 	Not automatically available
Directors and Shareholders	<ul style="list-style-type: none"> • Name • Surname • ID number • Financial information as required for statutory reporting 	Not automatically available
Clients	<ul style="list-style-type: none"> • Entity name • Registration number • Income tax number • VAT number • Contact details for representative persons • Invoices and statements • Contractual documentation • Project related data, designs and documentation 	Not automatically available

Suppliers/Service Providers	<ul style="list-style-type: none"> • Entity name • Registration number • Income tax number • VAT number • Contact details for representative persons • FICA documentation • BBBEE certificates • Invoices and statements • Contractual documentation 	Not automatically available
New Job Applicants	<ul style="list-style-type: none"> • Name • Surname • Address • Contact details • Email address • Telephone number • Details of qualifications • Skills • Employment history • Information about current level of remuneration, including benefits, disability status for reasonable accommodations and residency status 	Not automatically available
Website Visitors	<ul style="list-style-type: none"> • Name • Surname • Email address • Telephone number • Company name and/or Job Title (if disclosed) 	Not automatically available
Visitors	<ul style="list-style-type: none"> • Name • Surname • Contact number • Email address • Physical access records • Electronic access records • CCTV records 	Not automatically available
Children (of employees only)	<ul style="list-style-type: none"> • Name • Surname • Age • Address • Contact details (of parents) • Birth certificates (for medical aid purposes) • Passport or ID copies (where applicable for visa applications) 	Not automatically available

8. Annexures - Prescribed PAIA Request Forms

8.1. Annexure A - Form 2: Request for Access to Record (Regulation 7)

Download the current official Form 2 from the Information Regulator's PAIA forms page:
<https://infoeregulator.org.za/paia/>

8.2. Annexure B - Form 3: Outcome of Request and Fees Payable (Regulation 8)

Download the current official Form 3 from the Information Regulator's PAIA forms page:
<https://infoeregulator.org.za/paia/>

Note

This manual includes official download links to ensure ILS always uses the latest prescribed versions of Form 2 and Form 3 as published by the Information Regulator.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address: Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS
(Mark the applicable box with an "X")

Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer