

**PROMOTION OF ACCESS TO INFORMATION MANUAL  
OF**

**THE NEXGRO GROUP OF COMPANIES\***

**(\*The Companies listed in clause 4 of this Document)**

**PUBLISHED IN TERMS OF SECTION 51 OF THE  
PROMOTION OF ACCESS TO INFORMATION ACT,  
ACT NO. 2 OF 2000**



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### 3. Act and Definitions

- 3.1 This Promotion of Access to Information Manual ("Manual") provides an outline of the type of records and the personal information it holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 ("PAIA Act"). In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in term of paragraph 23 and 24 of the Protection of Personal Information Act 4 of 2013 ("POPI Act").
- 3.2 Definitions relevant to PAIA and this Manual, are set out in Annexure "A" annexed hereto.
- 3.3 The definitions are very important in terms of the interpretation of various aspects of this Manual and stipulated requirements. It is therefore of utmost importance to understand the definitions.

### 4. Introduction

- 4.1 The neXgro Group of Companies conducts business as an investment and trading company in the agricultural sector under the following Company names and registration numbers, with its main business objects and industry listed below:-

NO	COMPANY NAME	REGISTRATION NO	MAIN BUSINESS	INDUSTRY
1	<b>African Grain Investments Proprietary Limited</b>	2017/088570/07	A company trading in agricultural Grain Commodities, and delivery of related services	Agriculture
2	<b>FarmFocus Proprietary Limited</b>	2017/077808/07	A company providing general services relating to agricultural Grain Commodities, and delivery of related services	Agriculture
3	<b>Graanland Silo Proprietary Limited</b>	2021/305315/07	A company operating as storage facility in agricultural Grain Commodities, and delivery of related services	Agriculture
4	<b>Grain Handlers Proprietary Limited</b>	2019/159745/07	A company operating as storage facility in agricultural Grain Commodities, and delivery of related services	Agriculture
5	<b>neXdeal™ Proprietary Limited</b>	2019/569432/07	A company operating an online agricultural Commodities Trading Platform, and delivery of related services	Agriculture
6	<b>neXfin Proprietary Limited</b>	2022/715099/07	A company trading in agricultural Grain Commodities, and delivery of financial and related services	Agriculture, Financial Services
7	<b>neXgro® Bemarking Proprietary Limited</b>	2020/698522/07	A company trading in agricultural Grain Commodities, and delivery of related services	Agriculture
8	<b>neXgro® Graanbestuur Proprietary Limited</b>	2020/820132/07	A company operating as storage facility management administrator for agricultural Grain Commodities, and delivery of related services	Agriculture
9	<b>neXgro® Holdings Proprietary Limited</b>	2017/088615/07	An investment company holding shares in entities trading in agricultural Grain Commodities, and delivery of related services	Agriculture, Investment
10	<b>neXgro® Holfontein Proprietary Limited</b>	2014/013825/07	A company operating as storage facility in agricultural Grain Commodities, and delivery of related services	Agriculture
11	<b>neXgro® Logistics Proprietary Limited</b>	2000/014261/07	A company operating as logistics and transport broker in relation to agricultural Grain Commodities, and delivery of related services	Agriculture, Transport
12	<b>neXgro Storage Proprietary Limited</b>	1996/012583/07	A company trading in agricultural Grain Commodities, and delivery of related services	Agriculture
13	<b>Procuo Grain Proprietary Limited</b>	2007/015773/07	A company operating as storage facility in agricultural Grain Commodities, and delivery of related services	Agriculture

14	<b>Unigrain Proprietary Limited</b>	1996/008579/07	A company trading in agricultural Grain Commodities, and delivery of related services	Agriculture
15	<b>Unigrain Trading Proprietary Limited</b>	2001/016989/07	A company trading in agricultural Grain Commodity future agreements on the JSE, and delivery of related services	Agriculture, Financial Services
16	<b>Waagkraal Depot Proprietary Limited</b>	2021/914685/07	A company operating as storage facility in agricultural Grain Commodities, and delivery of related services	Agriculture

## 5. Companies' Contact Details

### 5.1 African Grain Investments (Pty) Ltd, Registration Number 2017/088570/07

- 5.1.1 CEO: ME Delpport
- 5.1.2 Directors: YP Nyembezi, GC Madasa
- 5.1.3 Information Officer: ME Delpport
- 5.1.4 Deputy Information Officer: L Steyn
- 5.1.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig, 1732
- 5.1.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.1.7 Telephone Number: 011 692 4400
- 5.1.8 Email Address of Information Officer: [madelize.delpport@nexgro.co.za](mailto:madelize.delpport@nexgro.co.za)

### 5.2 FarmFocus (Pty) Ltd, Reg no 2017/077808/07

- 5.2.1 CEO: ME Delpport
- 5.2.2 Directors: TGH de Lange, ME Delpport
- 5.2.3 Information Officer: ME Delpport
- 5.2.4 Deputy Information Officer: L Steyn
- 5.2.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig, 1732
- 5.2.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.2.7 Telephone Number: 011 692 4400
- 5.2.8 Email Address of Information Officer: [madelize.delpport@nexgro.co.za](mailto:madelize.delpport@nexgro.co.za)

### 5.3 Graanland Silo (Pty) Ltd, Reg no 2021/305313/07

- 5.3.1 CEO: ME Delpport
- 5.3.2 Directors: M Engelbrecht, GH Marx, LK Jonker, ME Delpport
- 5.3.3 Information Officer: ME Delpport
- 5.3.4 Deputy Information Officer: L Steyn
- 5.3.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig, 1732
- 5.3.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.3.7 Telephone Number: 011 692 4400
- 5.3.8 Email Address of Information Officer: [madelize.delpport@nexgro.co.za](mailto:madelize.delpport@nexgro.co.za)

### 5.4 Grain Handlers (Pty) Ltd, Reg no 2019/159745/07

- 5.4.1 CEO: ME Delpport
- 5.4.2 Directors: ME Delpport, HJ van der Merwe, JPS Leonard, HJ van Niekerk, TGH de Lange
- 5.4.3 Information Officer: ME Delpport
- 5.4.4 Deputy Information Officer: L Steyn
- 5.4.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig, 1732
- 5.4.6 Head Office Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.4.7 Physical Site Address: 13 & 15 Seventh Street, Industria, Kroonstad
- 5.4.8 Telephone Number: 011 692 4400
- 5.4.9 Email Address of Information Officer: [madelize.delpport@nexgro.co.za](mailto:madelize.delpport@nexgro.co.za)

### 5.5 neXdeal™ (Pty) Ltd, Reg no 2019/569432/07

- 5.5.1 CEO: ME Delpport
- 5.5.2 Directors: TGH de Lange, ME Delpport
- 5.5.3 Information Officer: ME Delpport
- 5.5.4 Deputy Information Officer: L Steyn
- 5.5.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig, 1732

- 5.5.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.5.7 Telephone Number: 011 692 4400
- 5.5.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

5.6 neXfin (Pty) Ltd, Reg no 2022/715099/07

- 5.6.1 CEO: ME Delport
- 5.6.2 Directors: TGH de Lange, ME Delport
- 5.6.3 Information Officer: ME Delport
- 5.6.4 Deputy Information Officer: L Steyn
- 5.6.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.6.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.6.7 Telephone Number: 011 692 4400
- 5.6.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

5.7 neXgro®Bemarking (Pty) Ltd, Reg no 2020/698522/07

- 5.7.1 CEO: ME Delport
- 5.7.2 Directors: TGH de Lange, ME Delport
- 5.7.3 Information Officer: ME Delport
- 5.7.4 Deputy Information Officer: L Steyn
- 5.7.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.7.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.7.7 Telephone Number: 011 692 4400
- 5.7.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

5.8 neXgro® Graanbestuur (Pty) Ltd, Reg no 2020/820132/07

- 5.8.1 CEO: ME Delport
- 5.8.2 Directors: TGH de Lange, ME Delport
- 5.8.3 Information Officer: ME Delport
- 5.8.4 Deputy Information Officer: L Steyn
- 5.8.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.8.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.8.7 Telephone Number: 011 692 4400
- 5.8.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

5.9 neXgro®Holdings (Pty) Ltd, Reg no 2017/088615/07

- 5.9.1 CEO: ME Delport
- 5.9.2 Directors: TGH de Lange, ME Delport, TE Scholtz, JJ van Zyl, JHM van Zyl, GC Madasa (non-executive)
- 5.9.3 Information Officer: ME Delport
- 5.9.4 Deputy Information Officer: L Steyn
- 5.9.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.9.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.9.7 Telephone Number: 011 692 4400
- 5.9.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

5.10 neXgro Holfontein (Pty) Ltd, Reg no 2014/013825/07

- 5.10.1 CEO: ME Delport
- 5.10.2 Directors: TGH de Lange, ME Delport
- 5.10.3 Information Officer: ME Delport
- 5.10.4 Deputy Information Officer: L Steyn
- 5.10.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.10.6 Head Office Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.10.7 Physical Site Address: Portion 17 of the Farm Holfontein No 49, Reg Div I.Q North West Province
- 5.10.8 Telephone Number: 011 692 4400
- 5.10.9 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

5.11 neXgro®Logistics (Pty) Ltd, Reg no 2000/014261/07

- 5.11.1 CEO: ME Delport
- 5.11.2 Directors: TGH de Lange, ME Delport
- 5.11.3 Information Officer: M E Delport
- 5.11.4 Deputy Information Officer: L Steyn

- 5.11.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.11.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.11.7 Telephone Number: 011 692 4400
- 5.11.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

#### 5.12 neXgro® Storage (Pty) Ltd, Reg no 1996/012583/07

- 5.12.1 CEO: ME Delport
- 5.12.2 Directors: TGH de Lange, ME Delport
- 5.12.3 Information Officer: ME Delport
- 5.12.4 Deputy Information Officer: L Steyn
- 5.12.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.12.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.12.7 Telephone Number: 011 692 4400
- 5.12.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

#### 5.13 Procuco Grain (Pty) Ltd, Reg no 2007/015773/07

- 5.13.1 CEO: ME Delport
- 5.13.2 Directors: PJB Malan, TGH de Lange, ME Delport, FN Swanepoel
- 5.13.3 Information Officer: ME Delport
- 5.13.4 Deputy Information Officer: L Steyn
- 5.13.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.13.6 Head Office Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.13.7 Physical Site Address: 9 Datsun Street, Aureus, Randfontein
- 5.13.8 Telephone Number: 011 692 4400
- 5.13.9 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

#### 5.14 Unigrain (Pty) Ltd, Reg no 1996/008579/07

- 5.14.1 CEO: ME Delport
- 5.14.2 Directors: TGH de Lange, ME Delport, GC Madasa (non-executive)
- 5.14.3 Information Officer: ME Delport
- 5.14.4 Deputy Information Officer: L Steyn
- 5.14.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.14.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.14.7 Telephone Number: 011 692 4400
- 5.14.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

#### 5.15 Unigrain Trading (Pty) Ltd, Reg no 2001/016989/07

- 5.15.1 CEO: ME Delport
- 5.15.2 Directors: TGH de Lange, ME Delport
- 5.15.3 Information Officer: ME Delport
- 5.15.4 Deputy Information Officer: L Steyn
- 5.15.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.15.6 Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.15.7 Telephone Number: 011 692 4400
- 5.15.8 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

#### 5.16 Waagkraal Depot (Pty) Ltd, Reg no 2021/914685/07

- 5.16.1 CEO: ME Delport
- 5.16.2 Directors: ME Delport, M Nel, SJ Nel
- 5.16.3 Information Officer: ME Delport
- 5.16.4 Deputy Information Officer: L Steyn
- 5.16.5 Postal Address: Postnet Suite #031, Private Bag x2, Ruimsig,1732
- 5.16.6 Head Office Street Address: 22 Furrow Road, Diswilmar AH, Krugersdorp, 1747
- 5.16.7 Physical Site Address: Portion 4 of the Farm Waagkraal No 374, Reg Div I.O. North West Province
- 5.16.8 Telephone Number: 011 692 4400
- 5.16.9 Email Address of Information Officer: [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za)

## 6. PAIA

- 6.1 PAIA grants a Requester access to records of a private body such as the neXgro Group of Companies, if a record is required for the exercise or protection of any rights.
- 6.2 If a public body lodges a request, the public body must be acting in the public interest.
- 6.3 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided for in terms of PAIA. The tariff and forms are dealt with in Sections 53 and 54 of PAIA.
- 6.4 Requesters are referred to the Guide in terms of Section 10 of PAIA, 2020 which has been compiled by the Information Regulator. The Guide will contain information for the purposes of exercising constitutional rights.
- 6.5 The Guide is available from the Information Regulator and the contact details of the Information Regulator are:

Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg 2001
Telephone Number:	+27 10 023 5200
Website:	<a href="http://www.inforegulator.org.za">www.inforegulator.org.za</a>

- 6.6 The prescribed form is Form 2, attached hereto as Annexure "B".
- 6.7 The outcome of a request and the prescribed tariffs are as set out in Annexure "C". The fees are payable prior to the records having to be handed to the Requester by the neXgro Group of Companies. A deposit may also payable as per Annexure "C".

## 7. Applicable Legislation

- 7.1 Certain records held by the neXgro Group of Companies are available in terms of legislation other than PAIA.
- 7.2 The specific records which are available in terms of such legislation are set out therein and these records may in certain instances only be accessed by the persons specified in the relevant legislation.
- 7.3 The legislation is as follows:

No	Name of Act	Number and Year of Act
1	Agricultural Pests Act	No. 36 of 1983
2	Basic Conditions of Employment Act	No. 75 of 1997
3	Bills of Exchange Act	No.34 of 1964
4	Broad-Based Black Economic Empowerment Act	No. 53 of 2003
5	Companies Act	No. 71 of 2008
6	Compensation for Occupational Injuries and Diseases Act	No. 130 of 1993
7	Competition Act	No.89 of 1998
8	Conservation of Agricultural Resources Act	No. 43 of 1983
9	Constitution of the Republic of South Africa	No.108 of 1996
10	Consumer Protection Act	No. 68 of 2008
11	Copyright Act	No. 98 of 1978
12	Criminal Procedure Act	No.51 of 1977
13	Currency and Exchanges Act	No.9 of 1933
14	Customs and Excise Act	No. 91 of 1964
15	Deeds Registries Act	No. 47 of 1937
16	Electronic Communication and Transaction Act	No. 25 of 2002
17	Employment Equity Act	No. 55 of 1998
18	Environment Conservation Act	No. 73 of 1989
19	Expropriation Act	No. 63 of 1975
20	Fertilisers, Farm Feeds, Agricultural Remedies and Stock Remedies Act	No. 36 of 1947
21	Financial Advisory and Intermediary Services Act	No. 37 of 2002
22	Foodstuffs, Cosmetics and Disinfectants Act	No. 54 of 1972
23	Foundation Seed Act	No. 29 of 1961
24	Genetically Modified Organisms Act	No. 15 of 1997
25	Income Tax Act	No. 58 of 1962
26	Labour Relations Act	No. 66 of 1995

27	National Credit Act	No. 34 of 2005
28	National Environmental Management Air Quality act	No. 39 of 2008
29	National Environmental Management Act	No. 107 of 1998
30	National Environmental Management Biodiversity Act	No. 10 of 2004
31	National Water Act	No. 36 of 1998
32	Occupational Health and Safety Act	No. 85 of 1993
33	Pension Funds Act	No. 24 of 1956
34	Plant Breeder's Rights Act	No. 15 of 1976
35	Plant Improvement Act	No. 53 of 1976
36	Plant Improvement Act	No. 11 of 2018
37	Prescription Act	No. 68 of 1969
38	Prevention and Combatting of Corrupt Activities Act	No. 12 of 2004
39	Prevention of Organised Crime Act	No. 121 of 1998
40	Promotion of Access to Information Act	No. 2 of 2000
41	Promotion of Equality and Prevention of Unfair Discrimination Act	No. 4 of 2000
42	Protected Disclosure Act	No. 26 of 2000
43	Protection of Personal Information Act	No. 4 of 2013
44	Restitution of Land Rights Act	No. 22 of 1994
45	Securities Transfer Tax Administration Act	No. 26 of 2007
46	Seeds Act	No. 28 of 1961
47	Seeds Amendment Act	No. 33 of 1967
48	Subdivision of Agricultural Land Act	No. 70 of 1979
49	Tax Administration Act	No. 28 of 2011
50	Transfer Duty Act	No. 40 of 1949
51	Unemployment Insurance Act	No. 63 of 2002
52	Value Added Tax Act	No. 89 of 1991
53	Water Act	No. 54 of 1956

## 8. Personal Information

- 8.1 The full privacy policy of the neXgro Group of Companies, setting out all aspects of how personal information is dealt with, is set out on the website, <https://www.nexgro.co.za/wp-content/uploads/2022/09/POPI-Policy-NeXgro-V3-2022-09-12.pdf>.

## 9. Schedule of Records

- 9.1 The following is a list of the subjects on which the neXgro Group of Companies holds records and the categories into which these records fall.
- 9.2 The records listed below will not in all instances be provided to a Requester who requests it in terms of PAIA.
- 9.3 The Requester has to prove that he/she/it has the right in terms of PAIA to be given access to the records in question.
- 9.4 No records are available without request as no notices relating to the neXgro Group of Companies has been published by the Minister in terms of Section 52(2) of PAIA.

Categories of Records	Description of Records held
Administration	<ul style="list-style-type: none"> <li>Minutes of meetings of directors</li> <li>Resolutions of the directors of the neXgro Group of Companies</li> <li>Applicable statutory documents, including but not limited to, certificates of incorporation and certificates to commence business</li> <li>Memorandum of Incorporation</li> <li>Directors' list</li> <li>Shareholding and shareholders' certificates</li> <li>Statutory returns to relevant authorities</li> <li>Name changes</li> </ul>

Corporate Governance	<ul style="list-style-type: none"> <li>• Codes of Conduct</li> <li>• Minutes of meetings of committees and subcommittees</li> <li>• Executive committee meeting minutes</li> <li>• Legal compliance records</li> <li>• Policies</li> </ul>
Finance	<ul style="list-style-type: none"> <li>• Accounting records</li> <li>• Tax records</li> <li>• VAT records</li> <li>• PAYE records</li> <li>• Debtors' records</li> <li>• Creditors' records</li> <li>• Financiers' records</li> <li>• Insurance records</li> <li>• Auditors' reports</li> <li>• Interim and annual financial statements</li> <li>• Bank statements and other banking records for business accounts</li> <li>• Invoices issues in respect of debtors and billing information</li> <li>• Records regarding the neXgro Group of Companies' financial commitments</li> <li>• Statistic SA returns</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• List of employees</li> <li>• Statistics regarding employees</li> <li>• Employment contracts</li> <li>• Conditions of employment</li> <li>• Information relating to prospective employees</li> <li>• Personnel records including personal details, leave available and taken, disciplinary records, performance and internal evaluation records, staff loan documents</li> <li>• Employee tax information</li> <li>• Records of Unemployment Insurance Fund contributions</li> <li>• Records regarding group life assurance and disability income protection</li> <li>• Provident fund records</li> <li>• Payroll records</li> <li>• Health and safety records</li> <li>• Workplace skills plans</li> <li>• Codes of conduct</li> <li>• Disciplinary core and procedure</li> <li>• Grievance procedure</li> <li>• Appeal procedure</li> <li>• Remuneration policy</li> <li>• Internal policies and procedures regarding dismissals, performance appraisal, recruitment, selection, advertising of positions, appointments, retirement, promotions, leave, extended sick leave, study leave, salaries, overtime, bonuses, medical aid, health and safety, adoption leave and benefits, BEE procurement, loans, working parents, black economic empowerment, smoking, use of company resources including telephones, vehicles and computers, sexual harassment, HIV-Aids and Pro Bono policy</li> <li>• Training schedules and material</li> <li>• Training records and statistics</li> <li>• Training agreements</li> <li>• Learnership programs</li> <li>• Correspondence relating to personnel</li> </ul>
Operations	<ul style="list-style-type: none"> <li>• Supplier list and details of suppliers</li> <li>• Agreements with suppliers</li> <li>• Access control records</li> <li>• Insurance documentation</li> <li>• Travel documentation</li> <li>• Session documents</li> <li>• Customer list, details of customers and agreements with customers</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>• Computer software</li> <li>• Support and maintenance agreements</li> <li>• Records regarding computer systems and programs</li> </ul>
Property	<ul style="list-style-type: none"> <li>• Asset register</li> <li>• Lease agreement in respect of immovable property</li> <li>• Title deeds in respect of immovable property held</li> <li>• Details of bond holder, property relating thereto, agreements with financiers, bond documents</li> </ul>
Miscellaneous	<ul style="list-style-type: none"> <li>• Internal correspondence</li> </ul>

## 10. Form of Request

To facilitate the processing of a Requester's request in terms of PAIA:

- 10.1 Use the prescribed form available on the website of the Information Regulator, alternatively refer to Annexure "B".
- 10.2 Address your request to the Information Officer of the neXgro Group of Companies, whose details are as follows: Ms ME Delport, [madelize.delport@nexgro.co.za](mailto:madelize.delport@nexgro.co.za).
- 10.3 Provide sufficient details to the neXgro Group of Companies to identify:
  - 10.3.1 The record/s requested;
  - 10.3.2 The Requester (and if an agent is lodging the request, proof of capacity which must be reasonably satisfactory to the neXgro Group of Companies), including identity documents and power of attorney;
  - 10.3.3 The form of access required;
  - 10.3.4 The postal address of the Requester within the Republic of South Africa, or an email address of the Requester;
  - 10.3.5 If the Requester wishes to be informed of the decision in any manner (in addition to written to the address or email referred to in clause 9.3.5) the manner and particulars thereof;
  - 10.3.6 The right which the Requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- 10.4 The neXgro Group of Companies may, and must in certain instances, refuse access to records on any of the grounds set out in Chapter 4 of Part 3 of PAIA, which includes but is not limited to:
  - 10.4.1 Access will result in the unreasonable disclosure of Personal Information about a third party;
  - 10.4.2 It is necessary to protect the commercial information of a third party or the neXgro Group of Companies;
  - 10.4.3 It is necessary to protect the confidential information of a third party or the neXgro Group of Companies;
  - 10.4.4 It is necessary to protect the safety of individuals or property;
  - 10.4.5 That a record constitutes privileged information for the purpose of legal proceedings;
  - 10.4.6 That it is necessary to protect the research information of a third party or the neXgro Group of Companies;
  - 10.4.7 Professional privilege.
  - 10.4.8 The neXgro Group of Companies will make a decision in relation to a request for records within 30 (thirty) days of receipt thereof, or such extended period as referred to in PAIA. The classification key are as follows:

Classification No.	Access	Classification (PAIA section)
1	May be Disclosed	Public Access Document
2	May not be Disclosed	Request after commencements of criminal or civil proceedings [s7]
3	May be Disclosed	Subject to copyright
4	Limited Disclosure	Personal information of natural persons that belongs to the requester of that information, or personal information of juristic persons represented by the requestor of that information [s61]
5	May not be Disclosed	Unreasonable disclosure of personal information or of Natural person [s63(1)] or Juristic Person [POPI]
6	May not be Disclosed	Likely to harm the commercial or financial interests of third part [s64(a)(b)]
7	May not be Disclosed	Likely to harm the Company or third party in contract or other negotiations [s64(c)]
8	May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]
9	May not be Disclosed	Likely to compromise the safety of individuals or protection of property [s66]
10	May not be Disclosed	Legally privileged document [s67]
11	May not be Refused	Environmental testing / investigation which reveals public safety / environmental risk [s64(2); s68(2)]
12	May not be Disclosed	Commercial information of Private Body [s68]
13	May not be Disclosed	Likely to prejudice research and development information of the Company or a third party [s69]
14	May not be Refused	Disclosure in public interest [s70]

- 10.5 Where a request is refused, a Requester may lodge a complaint in writing with the Information Regulator or apply to the High Court within 180 (one hundred and eighty) days of being informed of the refusal of the request, for an order

compelling the record or records requested to be made available to the Requester or for another appropriate order. The Court will determine whether the records should be made available or not.

## 11. Prescribed Fees

- 11.1 The Information Regulator is responsible for administering the constitution's right of access to information.
- 11.2 It has published a "Guide on How to Use the Promotion of Access to Information Act 2 of 2000".
- 11.3 This Guide includes the fees payable by a Requester to enable access to information.
- 11.4 To ensure that the fees payable for a request are current, the Requester is referred to the Annexure "C" as The Information Officer, whose details are set out in clause 9.2 above, will assist you if required.
- 11.5 The following applies to requests (other than personal requests):
  - 11.5.1 If the preparation of a record requested requires more than the prescribed 6 hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted);
  - 11.5.2 A Requester may lodge an application with a court against the tender/payment of the request fee and/or deposit;
  - 11.5.3 Records may be withheld until the fees have been paid.

## 12. Remedies

- 12.1 The company does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorized persons in section 2, is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the information Regulator (one established), for relief.

### 13. Annexure "A" - Definitions

In this Manual and in terms of PAIA, unless inconsistent with or otherwise indicated by the context, the following words will have the meanings assigned to them:

1. **FAIS**  
FAIS means the Financial Advisory & Intermediary Service Act, Act no. 37 of 2002;
2. **Information Officer**  
The designated compliance officer appointed by the neXgro Group of Companies from time to time, to address compliance with PAIA.
3. **Information Regulator**
4. **The Information Regulator established in terms of the Protection of Personal Information Act, 4 of 2013 and whose contact details is provided in Clause 1.50.**
5. **The neXgro Group of Companies**  
Any or all of the companies falling within the neXgro Group from time to time, currently consisting of *inter alia* the following:

<b>African Grain Investments Proprietary Limited</b>	2017/088570/07
<b>FarmFocus Proprietary Limited</b>	2017/077808/07
<b>Graanland Silo Proprietary Limited</b>	2021/305313/07
<b>Grain Handlers Proprietary Limited</b>	2019/159745/07
<b>neXdeal™ Proprietary Limited</b>	2019/569432/07
<b>neXfin Proprietary Limited</b>	2022/715099/07
<b>neXgro® Bemarking Proprietary Limited</b>	2020/698522/07
<b>neXgro® Graanbestuur Proprietary Limited</b>	2020/820132/07
<b>neXgro® Holdings Proprietary Limited</b>	2017/088615/07
<b>neXgro® Holfontein Proprietary Limited</b>	2014/013825/07
<b>neXgro® Logistics Proprietary Limited</b>	2000/014261/07
<b>neXgro® Storage Proprietary Limited</b>	
<b>Procuero Grain Proprietary Limited</b>	2007/015773/07
<b>Unigrain Proprietary Limited</b>	1996/008579/07
<b>Unigrain Trading Proprietary Limited</b>	2001/016989/07
<b>Waagkraal Depot Proprietary Limited</b>	2021/914685/07

6. **Personal Information**
  - 6.1. Personal information is any information that can be used to reveal a person's identity.
  - 6.2. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company, close corporation, trust, association), including, but not limited to information concerning:
    - 6.2.1. race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language, and birth of a person;
    - 6.2.2. information relating to the education or the medical, financial, criminal or employment history of the person;
    - 6.2.3. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
    - 6.2.4. the biometric information of the person;
    - 6.2.5. the personal opinions, views, or preferences of the person;

- 6.2.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or opinions of another individual about the person;
- 6.2.7. the views or opinions of another individual about the person;
- 6.2.8. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;
- 6.2.9. Personal Information concerning a child.

7. **PAIA**

It is the Promotion of Access to Information Act, Act no. 2 of 2000, as amended from time to time, together with regulations promulgated in terms thereof.

8. **This Manual**

This Manual means this manual as set out herein, together with all its Annexures, as amended from time to time.

9. **Requester**

Requester means any person (or a person acting on behalf of such person), including, but not limited to, a public body or an official thereof, making a request for access to a record.

#### 14. Annexure "B" – Form 2

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

15. Annexure "C" – Form 3 (Outcome of Request and of Fees)

<https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>