

PROMOTION OF ACCESS TO INFORMATION MANUAL

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1. PREAMBLE

S51 of the Promotion of Access to Information Act ("the Act") requires private bodies to complete a manual which shall facilitate requests for information. Braveheart Financial Services South Africa (Pty) Ltd ("Braveheart Financial Services") is such a private body which has compiled a manual, the terms of which are stated below.

2. CONTACT DETAILS

Postal address:
PostNet Suite #270
Private Bag X5
Norwood
2117

Physical address:
104 William Road
Norwood
Johannesburg
2192

Telephone Number:
+27 11 483 1025

Website address:
www.bravefin.com

3. CONTACT DETAILS OF THE CHIEF EXECUTIVE OFFICER AND THE INFORMATION LIAISON OFFICER OF BRAVEHEART FINANCIAL SERVICES (PTY) LTD

The Chief Executive Officer (CEO) Bernard James
Telephone number: (011) 483 1025
Email address: berniej@bravefin.com

The Information Liaison Officer Warren Gruskin
Telephone number: (011) 483 1025
Email address: warreng@bravefin.com

4. HUMAN RIGHTS COMMISSION GUIDE

The Human Rights Commission ("HRC") has compiled a guide as contemplated in section 10 of the Act, containing information to assist any person who wished to exercise any right as contemplated in the Act.

5. S52 of the Act

No known notice has been published by the Minister in the Government Gazette pertaining to records that is automatically available.

6. RECORDS AVAILABLE UNDER OTHER LEGISLATION

- 1 Basic Conditions of Employment Act 75 of 1997
- 2 Broad Based Black Economic Empowerment Act 75 of 1997
- 3 Companies Act 61 of 1973
- 4 Compensation for Occupational Injuries and Disease Act 130 of 1993
- 5 Consumer Affairs (Unfair Business Practices Act) 71 of 1998
- 6 Electronic Communications and Transactions Act 25 of 2002
- 7 Employment Equity Act 55 of 1998
- 8 Financial Advisory and Intermediary Services Act 37 of 2002
- 9 Financial Intelligence Centre Act 38 of 2001
- 10 Financial Services Board Act 97 of 1990
- 11 Income Tax Act 58 of 1962 and SARS Practice/General Notes
- 12 Labour Relations Act 66 of 1995
- 13 Short-Term Insurance Act 53 of 1998
- 14 Long term insurance Act 52 of 1998
- 15 Medical Scheme Act
- 16 Medical Scheme Amendment Act 55 of 2001
- 17 Occupation Health and Safety Act 85 of 1999
- 18 Pension Fund Act
- 19 Policy Holder Protection Rules
- 20 Prevention of Organised Crime Act 121 of 1998
- 21 Promotion of Access to Information act 2 of 2000
- 22 Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- 23 Skills Development Act 9 of 1998
- 24 Skills Development Levies Act 9 of 1999
- 25 Unemployment Insurance Act 63 of 2001
- 26 Usury Act 73 of 1965
- 27 Value Added Tax Act 89 of 1991

7. SUBJECTS AND CATEGORIES OF INFORMATION HELD BY BRAVEHEART FINANCIAL SERVICES

| | CATEGORY | SUBJECT |
|----|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) | Financial Tax and Regulatory Records | Monthly statement annual statements monthly management accounts, trail balances, general ledger, income tax returns, provisional tax returns, annual budget agendas and minutes of finance meetings, invoices, cash books, cheque requests, journals, bank statements, reconciliations, debit/credit notes, ledger trail balances, foreign exchange documentation, Vat returns, asset register licenses, trademarks, service manuals, safety manuals, record of incidents, PAYE, VAT, Regional Services Levies, Skills Development Levies IRP2, IRP5 documentation. |

Braveheart Financial Services (Pty) Ltd

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| b) | Company's Act and Contract documents | Memorandum and articles association share register, agendas, and minute of board meetings, agendas and minutes of audit committee meetings, agendas and minutes of remuneration committee meetings, agendas and minutes of executive committee meetings, annual reports, lease agreements, rental agreements, service agreements and other agreements dividend payments. |
| c) | Operational Documents and Information | Client financial and operational documents client business plans, client surveys, financial record slips (underwriting information), note/minutes of meetings, minutes of Trustee meetings, quotations from underwriters, recantation to clients presentations to insurers, presentation to potential clients, client documentation, contract broking/agency/intermediary documentation, policy wordings and endorsements cover records, general marketing and promotional information debit/credit notes, statement, general correspondence Computer data records, client claims, files (including claims report forms and correspondences), assessors reports, specialists, reports, medical reports, minutes of client meetings, invoices, notes, claims authorization, of payments, presentation to clients, brochures, performance records, product sales records, marketing plans and strategies. |
| d) | Human Resources | Offers of employment applications for employment, contracts of employment consultancy agreements, employee particulars, pension/provident fund application forms, death benefit beneficiary nomination. Workmen's compensation documentation, personnel policies, performance evaluation, job specifications, code of business ethics, employment equity plan, employee medical aid scheme documentation, employee pension fund documentation, disciplinary procedures and records, employee performance appraisals, loan and bursary agreements, payroll reports, training material, leave forms, medical scheme's Act, employee accreditation documentation. FAIS employee accreditation documentation, long service awards, training material. |
| e) | Information Technology | Software program and licensee, software application contracts with computer supplies and vendors project documentation specifications, budgets, system documentation, escrow software documentation and manuals, reports and report definitions, invoices, from suppliers and vendors disaster recovery plans and procedures all electronic documents, database systems with client information, internet connectivity inter-company emails. |

8. ACCESSING RECORDS HELD BY BRAVEHEART FINANCIAL SERVICES

1. The cost to search access, reproduces, and/or prepares any of the abovementioned records, unless;
 - 1.1. for every A4 size photocopy R1.10
 - 1.2. for every printed A4 size page R0.75
 - 1.3. for every copy on a stifty disk R7.50

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| 1.4. for a copy on compact disc | R70.00 |
| 1.5. for a transcript of visual images | R40.00 |
| 1.6. for a copy of visual images | R60.00 |
| 1.7. for a transcript of an audio record | R20.00 |
| 1.8. for a copy of an audio record | R30.00 |
2. The request fee payable by a requester, other than a personal requester, referred to in section 54 (1) of the Act is R50.00.
 3. Value added tax will be added to all fee's details in this manual and all other fees prescribed in terms of the regulation associated with the Act.

9. PROCEDURE FOR REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE

1. A request must be made on the prescribed form. A copy of the form is attached marked Annexure A.
2. The prescribed form should be submitted to the Information Liaison Officer at her address, telefax number or email address, the Information Liaison Officer shall either hand it to the Chief Executive Office or will deal with the request herself.
3. The following fees should accompany the prescribed form:
 - 3.1. R50.00
 - 3.2. of the Chief Executive Office or the Information Liaison is of the opinion that six (6) hours will be exceeded to search, reproduce and/or prepare the information requested, a deposit is payable to one-third at the amount of R30.00 (thirty rand) per hour or thereof exceeding the six (6) hours.
4. The Chief Executive Officer, as soon as reasonably possible and within thirty (30) days after the request has been received, shall decide whether or not to grant the request.
5. The requester shall be informed of the decision by the Chief Executive Officer or the Information Liaison Officer in the manner indicated by the requester in the prescribed form.
6. Notwithstanding a foregoing, Braveheart Financial Services will advise the requester in the manner stipulated by the requestor in the prescribed form of:
 - 6.1. the access fee to be paid for the information in accordance with clause 8.1;
 - 6.2. the format in which access will be given.
7. After access is granted, actual access to the record requested will be given as soon as reasonably possible.
8. If the request for access is denied, the Chief Executive Officer or the Information Liaison Officer shall advise the requester in writing, in a notice of refusal, the notice of refusal shall state the following:
 - 8.1. adequate reasons for the refusal;

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- 8.2. that the requestor may lodge an appeal with a court of competent jurisdiction against the refusal if the request (including the period) for lodging such appeal.
9. Upon the refusal by the Chief Executive Officer or the Information Liaison Officer, the deposit paid by the requester will be refunded.
10. If the Chief Executive Officer or Information Liaison Officer fails to respond within thirty (30) days after a request has been received it is deemed in terms of Section 58 read other with Section 56 (1) of the Act, that the Chief Executive Officer or the Information Liaison Officer has refused the request.
11. The Chief Executive Officer may decide to extend the period of thirty (30) days (*original period) for another period of not more than thirty (30) days if:
 - 11.1. The request is for a large number of records or;
 - 11.2. The search for the records it to be conducted at premises not situated in the same town of city as the head office of Braveheart Financial Services or;
 - 11.3. Consultation among branches, divisions, or departments, as the case may be, is required, or
 - 11.4. The requester consents to such an extension in writing; or
 - 11.5. The parties agree in any other manner to such an extension.
 - 11.6. Should Braveheart Financial Services require an extension of time, the requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension.

10. INFORMATION OF RECORDS NOT FOUND

1. If a requested record cannot be found or if the records do not exist, the Chief Executive Officer or the information Liaison Officer shall, by way of an affidavit or an affirmation, notify the requester that it is not possible to give access to the requested record.
2. The affidavit or affirmation shall provide an account of all reasonable steps taken to find the record or to determine its existence.
3. This notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act.
4. If the record should later be found the requester shall be given access to record in the manner stipulated by the requester in the prescribed form unless access is refused by the Chief Executive Officer or the Information Liaison Officer.
5. The attention of the requester is drawn to the provisions of Chapter 4 of the Act in terms of which Braveheart Financial Services may refuse, on certain specified grounds, to provide information to a requester.

11. INFORMATION REQUESTED ABOUT A THIRD PARTY

1. Sections 71 of the Act make provision for a request for information or records about third party.
2. In considering such a request, the company will adhere to the provisions of Section 71 to 74 of the Act.
3. The attention of the requester is drawn to the provisions of Chapter 5 Part 3 of the Act in terms of which the company is obliged, in certain circumstances, to advise third parties of the request lodged in respect of information applicable to or concerning such third parties. In addition, the provision of Chapter 2 of Parties to dispute the decision of the Chief Executive Officer or the Information Liaison Officer by referring matters to any court of competent jurisdiction.

12. ACCESS TO HEALTH OR OTHER RECORDS

1. If the Information Liaison Officer who grants a request for access to a record provided by a health practitioner in his capacity as such about the physical or mental health, or well-being:
 - 1.1. Of the requester; or
 - 1.2. If the request has been made on behalf of the person whom the record relates, of that person.
2. If such health practitioner is of the opinion that the disclosure of the record to the requester would be likely to cause serious harm to such person's physical or mental health or well-being, the Information Liaison Officer may only give access to the record if the requester provides that adequate provision has been made for such counselling as may be necessary in the circumstances.
3. Before access to the record is so given to the requester, the person responsible for such counselling must be given access to the record.

13. UPDATING OF MANUAL

The company will update this manual every six (6) months or at such intervals as may be necessary.

Braveheart Financial Services (Pty) Ltd

ANNEXURE A

REQUEST FOR ACCESS TO A RECORD OF A PRIVATE BODY (S53 (1) Promotion of Access to Information Act, Act 2 of 2000)

TO:
Warren Gruskin
Information Liaison Officer
Braveheart Financial Services (Pty) Ltd

104 William Road
Norwood, 2192, Johannesburg
Postnet Suite #270, Private Bag X5, Norwood, 2117
Telephone: 011 483 1025
Email: warreng@bravefin.com

PLEASE NOTE

If the provided space is inadequate, please continue on a separate folio and attach it to this form.

The requester must sign all additional folios.

1. PARTICULARS OF THE PERSON REQUESTING ACCESS TO THE RECORD

Full names
Identity number:
Postal address:
Post Code:
Telefax number:
Telephone numbers: Work (including dialling code):
Home (including dialling code):
Cellular telephone number:

2. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE

(This section must only be completed if a request for information is made on behalf of another person)

Full names:
Identity number:
Postal address:
Post Code:
Telefax number:
Telephone numbers: Work (including dialling code):
Home (including dialling code):
Cellular telephone number:

3. PARTICULARS OF RECORD REQUESTED

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:

4. FEES

- 4.1. A request for access to a record, will be processed only after a request fee has been paid
- 4.2. You will be notified of the amount required to be paid as the request fee.
- 4.3. The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search and prepare a record.

5. FORM OF ACCESS TO RECORD

- 5.1. If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 5.2 to 5.4 hereunder, please state your disability and indicate in which form the record is required:

| DISABILITY | FORM IN WHICH RECORD IS REQUIRED |
|------------|----------------------------------|
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- 5.2. Your indication as to the required form of access depends on the form in which the record is available.
- 5.3. Access to 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.
- 5.4. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

6. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

7. NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved or denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request:

SIGNED at _____ on this the _____ day of _____ 20_____

Signature of requester or person on whose behalf the request is made