



electronic
communications
network

**MANUAL IN TERMS OF SECTION 51
OF
THE PROMOTION OF ACCESS TO INFORMATION ACT
(ACT 2 OF 2000)
(the "Act")**

ELECTRONIC COMMUNICATIONS NETWORK (PTY) LTD

Registration number 2006/023090/07

("ECN" or "the Company")

PURPOSE:

The purpose of this document is to serve as the Manual of ECN as required in terms of the Act, and to provide a reference as to the records held and the procedures that need to be followed to request access to such records.

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1 INTRODUCTION

- 1.1 Electronic Communications Network (Pty) Ltd is a wholly owned subsidiary of Reunert Ltd, registration number 1913/004355/06.
- 1.2 ECN is a leading provider of telecommunications solutions.
- 1.3 With a proven track record in the Enterprise, Mid-Market and upper-end Small Medium Enterprise markets, our company leads the market with its voice and data solutions approach which enables organizations to improve their efficiency and reduce costs through easy-to-deploy solutions and systems to deliver operational efficiencies, with an approach that adds unique business value within the public and private sector.

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

Information Officer: **[INSERT]**
Physical Address: 42 James Crescent, Halfway House, Midrand, 1685
Postal Address: Private Bax X223, Midrand 1685
Tel: 010 590 0000
Fax: 010 590 0001
E-mail: **[INSERT]**@ecn.co.za
Website: www.ecn.co.za

3 GUIDE ON HOW TO USE THE ACT (Section 51 (1) (b) read with Section 10)

- 3.1 The South African Human Rights Commission has compiled a guide, in terms of Section 10 of the Act, containing such information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act. This guide was published in the first half of 2005 and access to it, and to any amended versions thereof, can be found on the website of the South African Human Rights Commission at www.sahrc.org.za, or a hard copy can be obtained from the South African Human Rights Commission offices at 29 Princess of Wales Terrace, Cnr York and St Andrews Street, Parktown, Johannesburg, Tel No (011) 484-8300.
- 3.2 The Human Rights Commission may be contacted directly at:

The South African Human Rights Commission EAIA Unit
The Research and Documentation Department
Postal address: Private Bag 2700
Houghton
2041
Telephone: (011) 877 3600
e-mail address: info@sahrc.org.za
Website: www.sahrc.org.za

4 CATEGORIES OF RECORDS AVAILABLE (Section 51 (1) (c))

The following categories of records are automatically available without a person having to request access in terms of this Act:

- 4.1 Statutory records:
Memorandum of Incorporation

Register of Directors

Register of Members

4.2 Corporate communications:

Press releases

4.3 Auditors

The company's auditors are Deloitte:

Address: Deloitte Place, The Woodlands, 20 Woodlands Drive,
Woodmead, Sandton, SOUTH AFRICA
Private Bag X 6, Gallo Manor
Johannesburg 2052
South Africa
Phone number : +27 (0) 11 806-5000
Fax number : +27 (0) 11 806-5003

5 RECORDS AVAILABLE IN ACCORDANCE WITH LEGISLATION (Section 51 (1) (d))

Records are available in accordance with the following current South African legislation (only to the extent that the relevant Act makes provision for the disclosure of records and only to the person or persons to whom and in the circumstances in which disclosure is compulsory):

The Pension Funds Act No. 24 of 1956;

The Income Tax Act No. 58 of 1962;

The Value Added Tax Act No. 89 of 1991;

The Occupational Health and Safety Act No. 85 of 1993;

The Compensation for Occupation Injuries and Diseases Act No. 130 of 1993;

The Labour Relations Act No. 66 of 1995;

Constitution of the Republic of South Africa, 1996;

Basic Conditions of Employment Act No. 75 of 1997;

Employment Equity Act No. 55 of 1998;

Competition Act No. 89 of 1998;

Skills Development Act No. 97 of 1998;

The National Environmental Management Act No. 107 of 1998;

Prevention of Organised Crime Act No. 121 of 1998;

Financial Intelligence Centre Act No. 38 of 2001;

Electronic Communications Act No. 36 of 2005;

Financial Advisory and Intermediary Services Act No. 37 of 2002;

Broad-Based Black Economic Empowerment Act No. 53 of 2003;

The National Environmental Management: Protected Areas Act No. 57 of 2003;

Prevention & Combating of Corrupt Activities Act No. 12 of 2004;

The National Environmental Management: Air Quality Act No. 39 of 2004;

National Credit Act No. 34 of 2005;

Electronic Communications Act No. 36 of 2005;

The National Environmental Management: Waste Act 59 of 2008;
Consumer Protection Act No. 68 of 2008;
The Companies Act No. 71 of 2008;
Protection of Personal Information Act (Only once it comes into law).

6 FORM OF REQUEST (Section 51(1)(e))

6.1 TO FACILITATE THE PROCESSING OF YOUR REQUEST, KINDLY:

- 6.1.1 Use the prescribed form, available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za;
- 6.1.2 Address your request to the Information Officer as per the contact details in 2 above;
- 6.1.3 Provide sufficient details to enable the COMPANY to identify:
 - 6.1.3.1 The record(s) requested;
 - 6.1.3.2 The requester (and if an agent is lodging the request, proof of capacity);
 - 6.1.3.3 The form of access required;
 - 6.1.3.4 The postal address or fax number of the requester in the Republic;
 - 6.1.3.5 If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
 - 6.1.3.6 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.

6.2 SUBJECTS ON WHICH RECORDS HELD AND CATEGORIES OF RECORDS:

- 6.2.1 Chief Executive's office:
 - 6.2.1.1 Statutory Records
 - 6.2.1.2 Administration Records
 - 6.2.1.3 Research Records
 - 6.2.1.4 Sponsorship Records
 - 6.2.1.5 Internal Reports and Communications
 - 6.2.1.6 Financial Reports
 - 6.2.1.7 Risk Management Records
 - 6.2.1.8 General Correspondence
- 6.2.2 Accounting:
 - 6.2.2.1 Accounting Records
 - 6.2.2.2 Internal Audit Records
 - 6.2.2.3 Tax Records
 - 6.2.2.4 General Correspondence
 - 6.2.2.5 Management Reports
 - 6.2.2.6 Treasury Dealing and Settlement Records
 - 6.2.2.7 Transactional Records
 - 6.2.2.8 VAT Records
 - 6.2.2.9 PAYE Records
 - 6.2.2.10 Internal Reports and Communications

- 6.2.3 Company Secretary:
 - 6.2.3.1 Secretarial Records
 - 6.2.3.2 General Correspondence
- 6.2.4 Human Resource (HR) Department:
 - 6.2.4.1 General Correspondence
 - 6.2.4.2 Employee Records
 - 6.2.4.3 General HR Policies and Procedures
 - 6.2.4.4 Training Records
 - 6.2.4.5 Pension Records
 - 6.2.4.6 Employee benefit Records
 - 6.2.4.7 Labour Relations Records
 - 6.2.4.8 Statutory Records
 - 6.2.4.9 Employment Equity Records
 - 6.2.4.10 Contracts
- 6.2.5 Legal Department:
 - 6.2.5.1 Working Files
 - 6.2.5.2 General Correspondence
 - 6.2.5.3 Copies of Agreements
 - 6.2.5.4 Statutory Records
 - 6.2.5.5 Litigation Records
 - 6.2.5.6 Legal Records
 - 6.2.5.7 Internal Reports and Communications
- 6.2.6 Occupational Health and Safety:
 - 6.2.6.1 Contracts and Agreements
 - 6.2.6.2 General Correspondence
 - 6.2.6.3 Minutes of Meetings
 - 6.2.6.4 Appointment Records
- 6.2.7 Information Technology Department (ITD):
 - 6.2.7.1 General Correspondence
 - 6.2.7.2 Contracts and Agreements
 - 6.2.7.3 Operational Records
 - 6.2.7.4 Equipment Records
 - 6.2.7.5 Policy Records

7 PRESCRIBED FEES (Section 51(1)(f))

The following applies to requests (other than personal requests):

- 7.1 A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- 7.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);

- 7.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 7.4 Records may be withheld until the fees have been paid.
- 7.5 The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.

SIGNED AT MIDRAND ON THIS DAY OF SEPTEMBER 2017

ANDY OPENSHAW

Chief Executive Officer

ELECTRONIC COMMUNICATIONS NETWORK (PTY) LTD