SIYAQHUBEKA
Forestry for Life

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 (as amended)	
Manual Owner	Wendy Pieterse
Approver	Lwandile Mbono
Effective	July 2026
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PAIA MANUAL STATEMENT

- This manual forms part of the manual owner's internal business processes and procedures.
- Any reference to the "organisation" shall be interpreted to include the "manual owner".
- The organisation's governing body, its employees, contractors, customers, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the manual's requirements and undertake to comply with the stated processes and procedures.
- Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

MANUAL SIGN-OFF

By signing this document, I authorise the manual owner's adoption of the processes and procedures outlined herein.

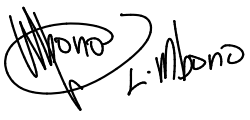
Name	W Pieterse	L. Mbono
Capacity	Company Secretary (MSA)	Area Manager (SQF)
Signature		
Date	30 June 2026	09 July 2026

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1 LIST OF ACRONYMS AND ABBREVIATIONS

1.1.	"**DIO**"	Deputy Information Officer;
1.2.	"**IO**"	Information Officer;
1.3.	"**MSA**"	Mondi South Africa (Pty) Ltd
1.4.	"**Minister**"	Minister of Justice and Correctional Services;
1.5.	"**PAIA**"	Promotion of Access to Information Act No. 2 of 2000 (as amended);
1.6.	"**POPIA**"	Protection of Personal Information Act No. 4 of 2013 (as amended);
1.7.	"**Regulator**"	Information Regulator; and
1.8.	"**Republic**"	Republic of South Africa.
1.9.	"**SQF**"	Siyaqhubeka Forests (Pty) Ltd;

2 PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF SQF

3.1 Chief Information Officer

Name:	Ed Montocchio
Tel:	031 451 2164
Email:	ed.montocchio@mondigroup.com

3.2 Deputy Information Officer (PAIA)

Name:	Wendy Pieterse
Tel:	031 451 2111
Email:	wendy.pieterse@mondigroup.com

Deputy Information Officer (POPIA)

Name:	Brenda-Lee Lodder
Tel:	031 451 2111
Email:	brenda-lee.lodder@mondigroup.com

3.3 Access to information general contacts

Email:	PAIA.Requests@mondigroup.com

3.4 Head Office

Postal Address:	P O Box 31024, Merebank, 4059
Physical Address:	Merebank Mill, Travancore Drive, Merebank, Durban, 4052
Telephone:	031 451 2111
Email:	PAIA.Requests@mondigroup.com
Website:	www.siyaqhubeka.co.za

4 GUIDE ON HOW TO USE PAIA AND ACCESS TO THE GUIDE

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The aforesaid Guide contains the description of-

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1 the Information Officer of every public body, and

4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

4.3.3 the manner and form of a request for-

4.3.3.1 access to a record of a public body contemplated in section 11[3]; and

4.3.3.2 access to a record of a private body contemplated in section 50[4];

4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.3.6.1 an internal appeal;

4.3.6.2 a complaint to the Regulator; and

4.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

4.3.7 the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

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[1] Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

[2] *Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

[3] *Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

[4] *Section 50(1) of PAIA- A requester must be given access to any record of a private body if-*
a) that record is required for the exercise or protection of any rights;
b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

[5] *Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

[6] *Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

[7] *Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

[8] *Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

[9] *Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[10] *Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

4.3.10 the regulations made in terms of section 92[11].

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained-

4.5.1 upon request to the Information Officer;

4.5.2 from the website of the Regulator (https://www.justice.gov.za/inforeg/).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English; and

4.6.2 Zulu.

5 SQF RECORDS AVAILABLE WITHOUT FORMAL REQUEST

SQF has elected, in terms of Section 52 of the Act, not to make available a list of automatically available records. All records of a public nature may be accessed on the SQF website: www.siyaqhubeka.co.za, free of charge.

6 SQF RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Category of record	Applicable Legislation
Accounting Records	Companies Act 89 of 1998; Income Tax Act 95 of 1967; Unemployment Contribution Act 4 of 2002; Unemployment Insurance Act 63 of 2001; Skills and Development Levies Act 9 of 1999; Value Added Tax Act 89 of 1991
Company Records	Companies Act 71 of 2008
Competition Records	Competition Act 89 of 1998
Consumer Records	Consumer Protection Act 68 of 2008
Copyright and Trademark Documents	Copyright Act 9 of 1978; Intellectual Property Laws Amendments Act 38 of 1997; Trademarks Act 194 of 1993
Employee Records	Basic Conditions of Employment Act 75 of 1977; Employment Equity Act 55 of 1998; Labour Relations Act 66 of 1995; Pension Fund Act 24 of 1956; Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
Data and Emails	Electronic Communications Act 36 of 2005; Electronic Communication and Transaction Act 2 of 2002

[11] *Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding-*
(a) any matter which is required or permitted by this Act to be prescribed;
(b) any matter relating to the fees contemplated in sections 22 and 54;
(c) any notice required by this Act;
(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

Category of record	Applicable Legislation
Treasury Records	SA Reserve Bank Act 90 of 1989
Safety	Occupational Health and Safety Act 85 of 1993
Miscellaneous	Protection of Personal Information Act No. 4 of 2013; Promotion of Access to Information Act 2 of 2000; Regional services Councils Act 109 of 1985

7 DESCRIPTION OF SUBJECTS AND CATEGORIES OF SQF RECORDS

Subject	Categories	
Secretarial Services	• Statutory records • Minutes of Meetings	• Share registers • Resolutions
Public Corporate Records	• Memorandum of Incorporation	• Records relating to appointment of directors, officers and secretary
Financial	• Annual Reports • Tax Records • Accounting Records	• Banking records • Invoices • Manager Accounts
Human Resources	• Personnel information • Employment contracts • Leave records • Career development records	• Employment equity • General terms of employment • UIF records • Disciplinary records
Legal	• General legal correspondence • Litigation and Dispute records	• Property Records • Trademarks • PAIA Record
Corporate Communications	• Media releases • Brochures	• Employee communication
Operations	• Customer agreements • Standard trading terms and conditions • Transport and vehicle records	• General policies and guidelines • Forestry operational records

8 PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

SQF processes personal information for the purposes of, *inter alia*, employment, opening of accounts, registration on the supplier database, rendering of invoices, delivery of goods and contracting.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Category of Data Subjects	Personal Information that may be processed
Customers/clients	Name, contact details, registration number or identity number, VAT number, employment status, credit checks, bank account details.
Employees and contractors	Full names, identity number, contact details, qualifications, gender, race, marital status, spouse's details, dependant details (including minors), citizenship status and nationality, income tax number, unemployment insurance number, beneficiary and emergency contact information, trade union membership, health, criminal checks, bank account details
Service Providers	Name, contact details, registration number or identity number, VAT & Tax number, public liability insurance / workman's compensation, BBBEE status, employment status, bank account details, qualifications, medical conditions.

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of Personal Information	Recipients or categories of Recipients to whom the personal information may be supplied
Identity number and names of employees (criminal checks)	South African Police Services
Qualifications of employees (qualification verification)	South African Qualifications Authority
Credit payment and history (Credit checks)	Credit Bureaus
Names and identity numbers of employees (medical aid and pension)	Medical Aids and Pension Funds (Anglomed and MMGPF)

8.4 Planned trans-border flows of personal information

There are trans-border flows of personal information of employees. This personal information will be stored in Austria, or a country with similar regulations to GDPR/POPIA. No other trans-border flow of personal information takes place without approval by the POPIA governing body.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

SQF is a subsidiary within the Mondi Group and as such, is governed by the Mondi Group's Security Policy that is audited by internal audit locally and globally. Such security measures include, *inter alia*, anti-virus procedures, data disaster recovery systems, user authentication systems. Mondi Group is an ISO27001 company with the necessary security measures in place.

9 AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.siyaqhubeka.co.za ;

9.1.2 head office of SQF for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10 UPDATING OF THE MANUAL

The Manual Owner shall be responsible for updating this manual on a regular basis.

Issued by

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Ed Montocchio

Chief Information Officer