

PROMOTION OF ACCESS TO INFORMATION ACT

SECTION 51 MANUAL

CITY LODGE HOTEL GROUP

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INTRODUCTION

This Manual has been prepared in accordance with section 51 of the Act and aims to facilitate a Request for access to a Record held by a private body that is required for the exercise or protection of any rights.

DEFINITIONS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them hereunder, namely –

- “Act” means the Promotion of Access to Information Act, Act 2 of 2000, as amended from time to time;
- “CLHG” means the City Lodge Hotel Group as more fully described in the overview hereunder;
- “Information Officer” means the person acting on behalf of CLHG and discharging the duties and responsibilities assigned to the head of CLHG by the Act. The Information Officer is duly authorised to act as such and such authorisation has been confirmed by the “head” of CLHG in writing;
- “Manual” means this manual published in compliance with Section 51 of the Act;
- “Record” means any recorded information, regardless of form or medium, which is in the possession or under the control of CLHG, irrespective of whether or not it was created by CLHG;
- “Request” means a request for access to a Record of CLHG;
- “Requestor” means any person, including a public body or an official thereof, making a Request for access to a Record of CLHG and includes any person acting on behalf of that person; and
- “SAHRC” means the South African Human Rights Commission.

Unless a contrary intention clearly appears, words signifying:-

- the singular includes the plural and vice versa;
- any one gender includes the other genders and vice versa; and
- natural persons include juristic persons.

Unless otherwise stated, terms defined in the Act shall have the same meaning in this Manual.

OVERVIEW OF CLHG

City Lodge Hotels Limited is a public company incorporated in accordance with the company laws of South Africa and listed on the Johannesburg Stock Exchange.

Through the vision of founder, Swiss born Hans Enderle and the financial backing of the Mine Pension Funds, City Lodge Bryanston (now called City Lodge Hotel Bryanston) in 1985 became the catalyst for what today is South Africa’s leading selective services hotel chain that is now also expanding into selected parts of Africa.

From the outset, emphasis was placed on quality accommodation, homely ambience and friendly service and these are still hallmarks of the group today. After pioneering the quality, selected services hotel concept in South Africa, the group was incorporated in July 1986 and has since substantially grown and diversified its product offering to meet different travellers’ needs.

With 5 Courtyards (381 suites), 17 City Lodges (3002 rooms), 10 Town Lodges (1315 rooms), and 22 Road Lodges (2059 rooms) the City Lodge Group has 54 hotels in South Africa offering over 6700 rooms and suites and ranks amongst the 250 largest hotel chains in the world.

In 2013, the group acquired a 50% interest in two hotels in Nairobi, Kenya, and it has since taken full ownership of the Fairview Hotel (127 rooms) and Town Lodge, Upper Hill (84 rooms), Nairobi.

City Lodge Hotels (Botswana) Pty Ltd opened its first hotel, the 104 room Town Lodge in Gaborone, Botswana on 14 May 2013. Town Lodge Gaborone in Botswana became the first new hotel developed by the group outside of South Africa.

Commitment to service excellence from a highly motivated and dedicated staff is a common thread throughout the group's hotels which have developed a loyal clientele of both business and leisure travellers over the past three decades.

CLHG comprises the following companies:

- City Lodge Hotels Limited
- Budget Hotels (Pty) Limited
- City Lodge Holdings (Share Block) (Pty) Limited
- Courtyard Management Company (Pty) Limited
- Gallic Courtyard (Arcadia) Share Block (Pty) Limited
- Gallic Courtyard (Bruma Lake) Share Block (Pty) Limited
- Gallic Courtyard (Rosebank) Share Block Limited
- Gallic Courtyard (Sandton) Share Block Limited
- Gallic Courtyard (Valkenberg) Share Block (Pty) Limited
- Property Lodging Investments (Pty) Limited
- City Lodge Hotels (Africa) (Pty) Ltd
- City Lodge Hotels (Botswana) (Pty) Ltd
- City Lodge Hotels (Namibia) Pty Ltd
- Fairview Hotels Ltd
- CLHG Tanzania Ltd
- CLHG Mozambique Lda

This Manual applies to all South African entities, both jointly and severally, and such entities are referred to both individually and collectively as CLHG.

1. CONTACT DETAILS OF INFORMATION OFFICER (SECTION 51(1)(a))

The Chief Executive of City Lodge Hotels Limited, as head of the private body, has delegated his powers to the Company Secretary, as Information Officer, whose details appear hereunder for purposes of dealing with all matters in connection with Requests for information on CLHG's behalf and to ensure compliance with the Act.

Group Company Secretary: Mrs Melanie van Heerden

Postal address: P O Box 97

Cramerview
2060

Street address: The Lodge
Bryanston Gate Office Park
Building 7
Corner Homestead Avenue and Main Road
Bryanston
2191

Telephone: +(27) 11 557 2600

Facsimile: +(27) 11 557 2601

E-mail: mvanheerden@clhg.com

Website: www.clhg.com

2. GUIDE TO THE ACT (SECTION 51(1)(b) READ WITH SECTION 10)

The SAHRC has compiled a guide, as required by Section 10 of the Act, containing such information as may reasonably be required by a person who wishes to exercise any right contemplated in this Act.

The guide is available on the SAHRC website, <http://www.sahrc.org.za>.

The SAHRC can be contacted directly at:

The South African Human Rights Commission: PAIA Unit

Postal address: Private Bag X2700
HOUGHTON
2041

Physical address: 2nd Floor
Braampark
Forum 3
33 Hoofd Street
Braamfontein

Telephone: +27 11 877 3600 (Switchboard)
+27 11 877 3750 (Gauteng Office)
+27 11 887 3803

Facsimile: +27 11 403 0668 (Gauteng Office)
+27 11 403 0625

E-mail: section51.paia@sahrc.org.za

Website: <http://www.sahrc.org.za>

3. AUTOMATIC DISCLOSURE - CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO REQUEST ACCESS [SECTION 51(1)(c)]

The following Records are automatically available without a person having to request access in terms of the Act:

- The web page www.clhg.com is accessible to anyone who has access to the Internet. The CLHG website hosts the following categories of information:
 - Hotel Brands
 - Courtyard
 - City Lodge
 - Town Lodge
 - Road Lodge
 - Hotel Info
 - Specials
 - Rates
 - Reservations
 - Hot Links
 - Location Map
 - Corporate Info
 - Corporate Profile
 - Financial Results: annual financial statements and interim reports
 - Integrated Report
 - King III Governance Register
 - Memorandum of Incorporation
 - BEE Industry Scorecard
 - Career Opportunities
- www.bid2stay.co.za
- Express Reservations; City Savers
- Product and promotional brochures/pamphlets
- News and marketing information
- Corporate communications
- Other literature intended for public viewing.

4. RECORDS AVAILABLE IN TERMS OF LEGISLATION [SECTION 51(1)(d)]

Records are kept in accordance with the following legislation (which is not an exhaustive list):

- Basic Conditions of Employment Act, 1997
- Broad Based Black Economic Empowerment Act, 2003
- Businesses Act, 1991
- Companies Act, 2008
- Consumer Protection Act, 2008
- Compensation for Occupational Injuries and Diseases Act, 1993
- Copyright Act, 1978
- Deeds Registries Act, 1937
- Electronic Communications and Transactions Act, 2002
- Employment Equity Act, 1998
- Financial Markets Act, 2012
- Foodstuffs, Cosmetics and Disinfectants Act, 1972
- Harmful Business Practices Act, 1999
- Immigration Act, 2002
- Income Tax Act, 1962
- JSE Listings Requirements
- Labour Relations Act, 1995
- Liquor Acts
 - Eastern Cape Liquor Act, 2003
 - Free State Gambling and Liquor Act, 2007
 - Gauteng Liquor Act, 2003
 - Kwazulu-Natal Liquor Licensing Act, 1989
 - Northern Cape Liquor Act, 2008
 - Mpumalanga Liquor Licensing Act, 2006
 - Liquor Act, 2003
- Long Term Insurance Act, 1998
- Medical Schemes Act, 1956
- Occupational Health and Safety Act, 1993
- Pension funds Act, 24 of 1956
- Prevention of Organised Crime Act, 1998;
- Protected Disclosures Act, 2000
- Securities Services Act, 2004
- Short Term Insurance Act, 1998
- Skills Development Act, 1998
- Skills Development Levies Act, 1999
- Trademarks Act, 1993
- Unemployment Insurance Act, 2001
- Value Added Tax Act, 1991

5. CATEGORIES OF RECORDS HELD AND SUBJECT TO REQUEST

5.1 Statutory and Legal

- statutory registers

- annual reports
- statutory Records & returns, including incorporation documents, memorandum of incorporation and share register
- minutes of meetings
 - board
 - board and statutory committees
 - management committees
- contractual and legal agreements
- intellectual property: trade marks certificates
- licences
- copyrights & designs
- health and safety Records

5.2 Human Resources

- HR policies & procedures
- employment equity plan and report
- skills development plan and report
- employee Records
- benefits
- IR disciplinary and grievance procedures and hearings, including CCMA Records
- Union negotiation Records
- incentive scheme rules

5.3 Administration, Finance & Accounting:

- accounting Records
- auditors reports
- tax returns
- VAT returns
- policies & procedures

5.4 Retirement Fund

- pension and provident fund rules
- correspondence
- statutory Records and returns

5.5 Insurance

- policies, including coverage, limits and insurers
- claim Records

5.6 Information technology

- hardware
- software packages
- licences
- IT policies and procedures
- operating systems

5.7 Sales and Marketing

- customer Records
- credit application forms
- statements of account
- terms & conditions
- marketing material and media releases: brochures, newsletters and advertising materials

5.8 Assets

- land and building register
- fixed assets register
- title deeds
- leases

5.9 Operational information

This information can be defined as information needed in the day-to-day running of the organization. (Examples of such information are: internal telephone lists, address lists, company policies, company procedures, human resource manual, administration manual, industry related statistical data, guest database, historical guest histories, guest reservation data, management information reports, property development information such as title deeds, lease agreements, construction contracts and architectural drawings).

6. OTHER INFORMATION AS MAY BE PRESCRIBED [SECTION 51(1)(f)]

Not applicable.

7. ACCESS: PROCEDURE, AVAILABILITY AND FEES

7.1 How to Request a Record (Section 53)

- Requests for access to Records must be made to the Information Officer in the prescribed form, Annexure 1 at the address, fax number or electronic mail address referred to in 1 above. Failure to make use of the prescribed form could result in your Request being refused or delayed.
- A Request for access to a Record must be accompanied by payment of an initial non-refundable Request fee of R57.00 (inclusive of VAT). This fee is not applicable to personal Requests, i.e. individual seeking access to Records pertaining him/herself.
- The Requestor must provide sufficient detail on the Request form to enable the Information Officer to clearly identify the Record as well as the Requestor's identify, which is to be accompanied by positive proof of identification.
- The Requestor must indicate which form of access is required and if he/she wishes to be informed on the decision on the Request in any other manner, to state the necessary particulars to be so informed.
- Access is not automatic. The Requestor must therefore identify the right he/she is seeking to exercise or protect and provide an explanation as to why the requested Record is required for the exercise or protection of that right.

- If a Request is made on behalf of a person, the Requestor must then submit proof, to the satisfaction of the Information Officer, of his/her authority to make the Request. Failure to do so will result in the Request being rejected.

7.2 Decision on Request (Section 56)

- The Requestor will be notified, within 30 days, in the manner indicated by him/her of the outcome of his/her Request, alternatively whether an extension not exceeding 30 days is required to deal with the Request.
 - If the Request for access is granted a further access fee must be paid for the reproduction as well as the search and preparation of the Records and for any time that has exceeded the prescribed hours to search and prepare the Record for disclosure. Access will be withheld until the Requestor has made payment of the applicable fee(s).
 - In the event that the Request for access is refused, reasons for the refusal will be provided and the Requestor will be advised the he/she may lodge an application with a court against the refusal of the Request, as well as the procedure for lodging the application.
- The Requestor may lodge an internal appeal or an application to court against the tender or payment of the Request fee.

7.3 Availability

This Manual is available on the CLHG website, www.clhg.com, alternatively at

The Lodge
Bryanston Gate Office Park
Building 7
Corner Homestead Avenue and Main Road
Bryanston
2191

during office hours.

7.4 Fees

The fees payable in respect of access to Records are attached as Annexure 2.

**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
FORM C**

(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000))
[Regulation 10]

A. Particulars of private body

The Information Officer: City Lodge Hotel Group in respect of _____
(specify company or operating division, if applicable)

If you are aware of the company within the City Lodge Hotel Group that holds the Record/s you are Requesting, please indicate this fact clearly. Where you are unsure of the company name, please give as much detail to facilitate our search for the Record/s concerned. Please note that your failure to specify a company name will not invalidate your Request, but it may cause unavoidable delays.

B. Particulars of person Requesting access to the Record

- | |
|---------------------------------------------------------------------------------------------------------|
| (a) The particulars of the person who requests access to the Record must be given below. |
| (b) The address and/or fax number in the Republic to which the information is to be sent must be given. |
| (c) Proof of the capacity in which the Request is made, if applicable, must be attached. |

Full Name and Surname:

Identity Number:

Postal Address:

Telephone Number: _____

Fax Number: _____

E-mail address: _____

Capacity in which Request is made, when made on behalf of another person:

C. Particulars of person on whose behalf Request is made

This section must be completed ONLY if a Request for information is made on behalf of another person.

Full names and Surname:

Identity Number:

D. Particulars of Record

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The Requestor must sign all the additional folios.**

1. Description of the Record or relevant part of the Record:

2. Reference number, if available:

3. Any further particulars of the Record:

E. Fees

- (a) A Request for access to a Record, other than a Record containing personal information about you, will be processed only after a Request fee has been paid.
- (b) You will be notified of the amount payable as the Request fee.
- (c) 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.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption of payment of the fee (if any):

F. Form of access to Record

| | | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--|------------------------------------------------------|---------------------------------------------------------------|-------------------------------------------------------------|----|
| If you are prevented by a disability to read, view or listen to the Record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the Record is required. | | | | | | |
| Disability: | | | Form in which Record is required: | | | |
| Mark the appropriate box with an X . NOTES: (a) Compliance with your Request in the specified form may depend on the form in which the Record is available. (b) Access in 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. (c) The fee payable for access to the Record, if any, will be determined partly by the form in which access is requested. | | | | | | |
| 1. If the Record is in written or printed form: | | | | | | |
| | Copy of Record* | | | Inspection of Record | | |
| 2. If Record consists of visual images (This includes photographs, slides, video Recordings, computer-generated images, sketches, etc.): | | | | | | |
| | View the images | | Copy of the images * | | Transcription of the images* | |
| 3. If Record consists of Recorded words or information which can be reproduced in sound: | | | | | | |
| | Listen to the soundtrack (Audio cassette) | | | Transcription of soundtrack* (Written or printed document) | | |
| 4. If Record is held on computer or in an electronic or machine -readable form: | | | | | | |
| | Printed copy of Record* | | Printed copy of information derived from the Record* | | Copy in computer readable form* (Stiffy or compact disc) | |
| * If you requested a copy or transcription of a Record (above), do you wish the copy or transcription to be posted to you? Postage is payable. | | | | | YES | NO |

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form.
The Requestor must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

2. Explain why the requested Record is required for the exercising or protection of the aforementioned right:

H. Notice of decision regarding Request for access

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

How would you prefer to be informed of the decision regarding your Request for access to the Record?

Signed at _____ this _____ day of _____ 20__

SIGNATURE OF REQUESTOR / PERSON ON WHOSE BEHALF REQUEST IS MADE

ANNEXURE 2

FEES PAYABLE

1. Copy of manual
The fee for a copy of the manual is R1,10 for every photocopy of an A4-size page or part thereof.
2. Reproduction fees
The fees for preparation of Records referred to in regulation 11(1) are as follows:

| | Rand |
|----------------------------------------------------------------------------------------------------------------------------|-------------|
| (a) For every photocopy of an A4-size page or part thereof | 1,10 |
| (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form | 0,75 |
| (c) For a copy in a computer-readable form on: | |
| (i) Electronic media, i.e. diskette | 7,50 |
| (ii) Compact disc | 70,00 |
| (d) (i) For a transcription of visual images, for an A4-size page or part thereof | 40,00 |
| (ii) For a copy of visual images | 60,00 |
| (e) (i) For a transcription of an audio Record, for an A4-size page or part thereof | 20,00 |
3. Request fee
The Request fee payable by a Requestor, other than a personal Requestor, referred to in Regulation 11(2) is R50,00.
4. Access fees
The access fees payable by a Requestor referred to in regulation 11(3) are as follows:

| | Rand |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| (a) For every photocopy of an A4-size page or part thereof | 1,10 |
| (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form | 0,75 |
| (c) For a copy in a computer-readable form on - | |
| (i) Electronic media, i.e. diskette | 7,50 |
| (ii) Compact disc | 70,00 |
| (d) (i) For a transcription of visual images, for an A4-size page or part thereof | 40,00 |
| (ii) For a copy of visual images | 60,00 |
| (e) (i) For a transcription of an audio Record, for an A4-size page or part thereof | 20,00 |
| (f) To search for and prepare the Record for disclosure for each hour or part of an hour reasonably required for such search and preparation | 30,00 |

For purposes of section 22(2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable; and
- (b) One third of the access fee is payable as a deposit by the Requestor.

The actual postage is payable when a copy of a Record must be posted to a Requestor.