

Goldrush Group of Companies

(its associates and contract partners)

("Goldrush" or "the Goldrush Gaming Group" or
"the Company")

Manual in terms of The Promotion of Access To Information Act, No 2 of 2000 ("the Act")

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A. INTRODUCTION TO THE GOLDRUSH GROUP OF COMPANIES

Goldrush Gaming Group's primary business is to own and operate gaming and entertainment venues/branches and outlets throughout South Africa and Africa offering a diverse range of gaming and entertainment options, including 33 bingo venues with electronic bingo terminals ("EBT's"), 28 Bookmaking /Betting retail branches as well as conducting the business of a licensed Route Operator of LPM's in six (6) provinces and contracting with three hundred and ninety nine (399) small businesses owners who themselves are licensed to operate LPM's, examples of these are hotels, restaurants, bars, taverns and shebeens to place limited pay-out machines ("LPM's"). We also have a casino in Lesotho, an independent nation housed entirely within the borders of South Africa.

Goldrush also has several active minority interests in a variety of other licensed entities an example of which is the shareholding in BOSS Gaming (The "minority interest" is ownership or interest of less than 50% of an enterprise, it can be stock ownership or a partnership interest in a company. The minority interest is held by an investor or another organization other than the parent company. Minority interests generally come with certain rights and privileges for the stakeholder.

B. PURPOSE OF MANUAL

1. The purpose of this manual is to facilitate requests for access to information regarding the Goldrush Gaming Group and it applies in respect of the Goldrush Group of Companies and each member company or subsidiary described in Annexure A. This manual does not broadly deal with every procedure as provided for in the Act. Requesters of information must acquaint themselves with the provisions and terms of the Act before any such request/s from the Goldrush Gaming Group will be entertained by the Information Officer or a Deputy.
2. The Goldrush Gaming Group provides no guarantee, makes no representation and gives no undertaking or warranty that the information provided by any of the Goldrush Companies to the requester as to the validity of the information provided, or that such contents can be used for any purpose. All requesters and end users of the information provided and who choose to use such information do so entirely at their own risk, and the Company shall not be liable for any loss, expense, liability or claims, howsoever arising, resulting from the use of this manual or any information provided by the Goldrush Gaming Group or any error therein.

PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

1. Contact details [Section 51(1)(a)]

The Group Chief Executive Officer of the Goldrush Group of Companies has appointed a Group POPIA & PAIA Information Officer and has duly authorised that person to ensure the various divisional Compliance Managers assist by being appointed as Deputy Information Officers, who together will all contribute to the management of both the POPI/PAIA Acts.

Address:	66 Ontdekkers Road, Cnr Ontdekkers & Ruhamah
Physical	Drive, Westgate, 1734
Postal Address:	P O Box 7383, Westgate, Roodepoort, 1734
Telephone	27 (0) 11 279 7900
E-mail	mike.burns@goldrushgroup.co.za
Website	www.goldrush.co.za

2. **Guide on how to use the Act***[Section 51(1)(b)]*

The Promotion of Access to Information Act grants a requester (The **requester** is the natural or juristic person **making an access to information request**, or it also refers to the person who is making the information request on behalf of somebody else) access to records of a company if the record is required for the exercise or protection of any rights.

If a public body lodges a request, the public body must be acting in the public interest. Requests in terms of the Act are required to be made in accordance with the prescribed procedures, at the rates provided. This Guide is available from the South African Human Rights Commission: PAIA unit, Research and Documentation Department, Postal Address: Private Bag 2700, Houghton, 2041; Telephone : +27 11 484 8300; Fax : +27 11 484 0582; Website : www.sahrc.org.za; mail: paia@sahrc.org.za.

3. **Records available in terms of any other legislation** *[Section 51(1)(d)]*

Records are kept and are available upon specified conditions (and in certain instances only to specified persons) in accordance with such other legislation as is applicable to the Goldrush Gaming Group, including (and as amended from time to time):

i. **Company Secretarial, Legal and Liquor**

- Companies Act 71 of 2008
- Consumer Protection Act 68 of 2008
- Gauteng Liquor Act 2 of 2003
- Free State Liquor Act 3 of 2007
- KwaZulu-Natal Liquor Act 27 of 1989
- Western Cape Liquor Act 4 of 2008
- Eastern Cape Liquor Act 10 of 2003
- Mpumalanga Liquor Act 5 of 2006
- National Liquor Act 59 of 2003
- Northern Cape Liquor Act 2 of 2008
- North West Liquor Act 27 of 1989
- Copyright Act 98 of 1978
- Customs and Excise Act 91 of 1964
- Competition Act 89 of 1998

ii. **Accounting and Finance**

- Financial Intelligence Centre Act 38 of 2001
- Revenue Laws Amendment Act 60 of 2008
- Value Added Tax Act 89 of 1991
- Income Tax Act 58 of 1962
- National Credit Act 34 of 2005
- South African Reserve Bank Act 90 of 1989

iii. **Human Resources**

- Broad-Based Black Economic Empowerment Act, 53 of 2003
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Skills Development Levies Act 9 of 1999
- Pension Funds Act 24 of 1956
- Medical Schemes Act 131 of 1998
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Occupational Health and Safety Act 85 of 1993
- Unemployment Insurance Act 63 of 2001
- Environmental Health and Safety Act 1989

iv. **Gambling Acts**

- National Gambling Act of 2004
- Eastern Cape Gambling and Betting Act of 1997
- Gauteng Gambling Act of 1995
- KwaZulu-Natal Gambling Act of 1996
- Free State Gambling and Liquor Act of 2010
- The North West Gambling Act of 2001
- Northern Cape Gambling Act of 2008
- Northern Province (Limpopo Province) Gambling Act of 1996

4. **Access to records in possession of the Goldrush Gaming Group** [Sections 51(1) and 51(1)(e)]

(i) The categories of records which may be requested and may be made available after consideration [Section 51(1)(e)]

Kindly note that this does not mean that the information and records listed below will automatically be made available as there are a number of grounds for refusal of access [Sections 7, 61 and 63 to 70]

Company Secretarial or Legal

- Management Agreements
- Registered trademarks, trade names, protected names and other copyright items
- Statutory records
- Licences
- Minutes of meetings
- Compliance Committee reports
- Audit and Risk Committee reports
- Gambling Board Correspondence
- Any litigation information
- Title Deeds
- Leases
- Limits of Authority
- Various Company Internal Control Procedures
- Organograms

Financial Information

- Audited financial statements
- Management accounts
- Taxation records
- Asset register
- Banking details
- Treasury documents
- Insurance Information
- Salary and Payroll Information

Information Technology and General Information

- Databases
- Computer software
- Registered Trade marks and Patents
- BBBEE Verification Certificates
- Loyalty Programme Membership
- Consensually obtained Member Information and relationship history

Human Resources

- HR and Remuneration Committee reports
- Staff employment records
- Staff disciplinary records and history
- Contracts of employment
- Employment equity reports
- HR Policy and Procedures
- Pension and Provident Fund details
- Collective Agreements
- Key Employee Licences

ii. The request procedure

To facilitate the processing of your request, kindly:

- Use the prescribed form.
- Provide proof of identity to authenticate the request and the requester. Therefore in addition to the prescribed form, requesters will be required to supply a certified copy of their identification document or any other legally acceptable form of identification.
- Address your request to the Group POPIA & PAIA Information Officer or one of several appointed Deputy Information Officers at the address or electronic mail address of the Goldrush Gaming Group.
- Provide sufficient details to enable the Goldrush Gaming Group to identify the following:
 - (a) record(s) requested;
 - (b) requester (and if an agent is lodging the request, proof of capacity);
 - (c) the form of access required;
 - postal address or electronic mail address of the requester in the Republic;
 - if the requester wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof;
 - (d) 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 that right.

iii. Notification

Requesters will be informed within 30 days of the Goldrush Group Gaming Group's decision regarding the "application", including the grounds for refusal as contemplated in Sections 7, 61 and 63 to 70 of the Act, should such an outcome be decided upon.

Please note, the period for consideration may be extended for a further 30 day period should more time be required to consider or gather the requested information. The requester will, however, be notified should the initial 30 day notice period be extended for a further 30 days.

iv. **Prescribed Fees**

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

- A requester is required to pay the prescribed fees (if any) before a request will be processed;
- 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);
- A requester may lodge an application with a court against the tender/ payment of the request fee and/or deposit;
- Records may be withheld until the fees have been paid.

5. **Other information as may be prescribed** *[Section 51(1)(f)]*

The Minister of Justice and Constitutional Development has not made any Regulations in this regard, so this section is deemed "Null and Void" for now.

6. **Availability of the Manual** *[Section 51(3)]*

This Manual is also available for inspection at the offices of the Goldrush Group Gaming Group, at any of their provincial or divisional offices, and on the Goldrush Group Gaming Group website/s referred to above.

7. **Key Objectives**

1. to encourage compliance with POPI;
2. deal with requests made to Goldrush in relation to POPI (for instance, requests from Data Subjects;
3. work with the Regulator in relation to investigations, and
4. to ensure compliance with POPIA.

ANNEXURE A

Group of Companies

Goldrush Bingo Venues trading as:

Goldrush Ballito
Goldrush Bingo Alberton
Goldrush Bingo Atterbury
Goldrush Bingo Bella Bella
Goldrush Bingo Bushbuckridge
Goldrush Bingo Cradock
Goldrush Bingo Cresta
Goldrush Bingo Ermelo
Goldrush Bingo Graaff-Reinet
Goldrush Bingo Grahamstown
Goldrush Bingo Groblersdal
Goldrush Bingo Hillcrest
Goldrush Bingo Kolonnade
Goldrush Bingo Mall@Reds
Goldrush Bingo Malvern
Goldrush Bingo Margate
Goldrush Bingo Morula
Goldrush Bingo Potchefstroom
Goldrush Bingo Richards Bay
Goldrush Bingo Rustenburg
Goldrush Bingo Vaal Mall
Goldrush Chatsworth
Goldrush Middelburg
Goldrush Scottburgh
Goldrush Bingo Phoenix
Goldrush Bingo Pietermaritzburg (nearing completion)
Goldrush Bingo Stanger (nearing completion)

BOSS Gaming Bingo Venues trading as:

Bingo Royale Buffalo City
Bingo Royale Cleary Park
Bingo Royale Jeffreys Bay
Bingo Royale Lusikisiki
Bingo Royale Matatiele
Bingo Royale Mthatha

Goldrush LPM Route Operations trading as:

EGOLI Gaming (Pty) Ltd t/a Goldrush Slots Gauteng
Goldrush North West (Pty) Ltd t/a Goldrush Slots North West
Goldrush Slots Limpopo (Pty) Ltd t/a Goldrush Slots Limpopo

Crazy Slots LPM Route Operations trading as:

Crazy Slots (Pty) Ltd t/a Crazyslots Gauteng
Dymacure (Pty) Ltd t/a Crazyslots Northern Cape
Restivox (Pty) Ltd t/a Crazyslots Free State

BOSS Gaming Independent LPM Site Operations trading as:

Laviwe Trading (Pty) Ltd t/a Spin 'n Win Mthatha
Spin And Win Entertainment Mbizana (Pty) Ltd
Amandla Asiwe Trading (Pty) Ltd t/a Spin 'n Win Matatiele
K2014000230 (Pty) Ltd t/a Spin 'n Win Uitenhage
Merimanzi (Pty) Ltd t/a Spin 'n Win Lusikisiki

Gbets and Managed Bookmaking / Betting Operations trading as:

Gauteng

Saxofar Pty Ltd t/a Gbets Cosmo City
Fundizise Pty Ltd t/a Gbets Roodepoort
Tauzest Pty Ltd t/a Gbets Atteridgeville
Fundisolve Pty Ltd t/a Gbets Carletonville
Khalizad Investments Pty Ltd t/a Crazy Bets Randbur
Khalizad Investments Pty Ltd t/a Crazy Bets Bronkhor
Khalizad Investments Pty Ltd t/a Crazy bets Mall @ R
Gbets Morula

North West

Toriglo Pty Ltd t/a Gbets Potchesfstrom
Toriglo Pty Ltd t/a Gbets Klerksdorp
Toriglo Pty Ltd t/a Gbets Bapong
Toriglo Pty Ltd t/a Gbets Garankuwa
Toriglo Pty Ltd t/a Gbets Tlhabane
Toriglo Pty Ltd t/a Gbets Moruleng
Gbets North West Pty Ltd t/a Gbets Phokeng
Gbets North West Pty Ltd t/a Gbets Wolmaransstad

Western Cape

Dymanex Pty Ltd t/a Gbets Wynberg
Dymanex Pty Ltd t/a Gbets Darling Street

Eastern Cape

Vandastar Pty Ltd t/a Gbets Matatiele
Vandastar Pty Ltd t/a Gbets Port Elizabeth
Vandastar Pty Ltd t/a Gbets Graaf Reinet
Vandastar Pty Ltd t/a Gbets Cradock
Boss Bookmaker Pty Ltd t/a Gbets Uitenhage
Boss Bookmaker Pty Ltd t/a Gbets Bizana

Northern Cape

Kerlifon Pty Ltd t/a Gbets Kathu

Kwa-Zulu Natal

Toripax Pty Ltd t/a Gbets Port Shepstone
Toritime Pty Ltd t/a Gbets Dundee
Faldozest Pty Ltd t/a Gbets Umzimkhulu
Faldozest Pty Ltd t/a Gbets Esikhewini
Faldozest Pty Ltd t/a Gbets Nongoma
Faldozest Pty Ltd t/a Gbets Nquthu
Faldozest Pty Ltd t/a Gbets Hotel Savera

ANNEXURE B

Prescribed Fees for Private Bodies

1. The fee for a copy of the Manual as contemplated in regulation (9)(2)(c) is R1.10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:
 - (a) For every photocopy of an A4-size page or part thereof = R1.10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form = R0.75
 - (c) For a copy in a computer-readable form on -
 - (i) compact disc
 - (ii) flash drive = R70.00
 - (d) For a transcription of visual images,
 - (i) for an A4-size page or part thereof
 - (ii) for a copy of visual images = R60.00
 - (e) For a transcription of an audio record,
 - (i) for an A4-size page or part thereof
 - (ii) for a copy of an audio record = R30.00
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R75,00.
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:
 - (1) (a) For every photocopy of an A4-size page or part thereof = R1.10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form = R0.75
 - (c) For a copy in a computer-readable form on -
 - (i) compact disc
 - (ii) flash drive = R70.00
 - (d) For a transcription of visual images,
 - (i) for an A4-size page or part thereof
 - (ii) for a copy of visual images = R60.00
 - (e) For a transcription of an audio record,
 - (i) for an A4-size page or part thereof
 - (ii) for a copy of an audio record = R30.00
 - (f) To search for and prepare the record for disclosure, R30,00 for each part of an hour reasonably required for such search and preparation.
 - (2) For purposes of section 54(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 requester.
 - (3) The actual postage is payable when a copy of a record must be posted to a requester.

ANNEXURE C

Prescribed forms

**REQUEST FOR ACCESS TO RECORDS OF
THE GOLDRUSH GROUP OF COMPANIES**

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

[Regulation 10]

A. Particulars

Goldrush Group of Companies (and its partners or subsidiaries)
Attention: The Group POPI & PAIA Information Officer
e-mail: mike.burns@goldrushgroup.co.za
66 Ontdekkers Road, Cnr Ontdekkers & Ruhamah Drive, Westgate, 1734
P O Box 7383, Westgate, Roodepoort, 1734
Telephone +27 11 2797900

B. Particulars of person requesting access to the record

<p>(a) <i>The particulars of the person who requests access to the record must be given below.</i></p> <p>(b) <i>The address and/or electronic address in the Republic to which the information is to be sent must be given.</i></p> <p>(c) <i>Proof of the capacity in which the request is made, if applicable, must be attached.</i></p>

Full names and surname: _____

Identity number: _____

Postal address: _____

Telephone 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

<p><i>This section must be completed ONLY if a request for information is made on behalf of another person.</i></p>

Full names and surname : _____

Identity number : _____

D. **Particulars of record**

<p>(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.</p> <p>(b) If the provided space is inadequate, please continue on a separate page/s and attach it to this form. The requester must sign all the additional page/s.</p>
--

Description of record or relevant part of the record : _____

Reference number, if available: _____

Any further particulars of record: _____

E. **Fees**

<p>(a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.</p> <p>(b) You will be notified of the amount payable required to be paid as the request fee.</p> <p>(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.</p> <p>(d) If you qualify for exemption of the payment of any fee, please state the reason/s for exemption.</p>
--

Reason for exemption from payment of fees: _____

F. **Form of access to record**

<p><i>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, consent to confidentially explaining the disability, thus allowing us to provide you with the most suitable form of record requested.</i></p>	
Disability: _____ _____ _____	Form in which record is required : _____ _____ _____

Mark the appropriate box with an **X**

NOTES:

- (a) *In accordance with your request and in order to comply, the specified form of record requested may depend on the form in which the Goldrush record/s are available.*
- (b) *Access in the form requested may be refused due to the Company under certain circumstances not having the requested information in a different form. In such a case, you will be informed if access can be granted in a different form which is still acceptable to the requester.*
- (c) *The fee payable for access to the record, if any, will be determined partly by the form in which access is requested as set out in the fee pay-table above.*

1. If the record is in written or printed form:

<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
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2. If record consists of visual images:

(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

<input type="checkbox"/>	View the images	<input type="checkbox"/>	copy of the images*	<input type="checkbox"/>	transcription of the images*
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3. If record consists of recorded words or information which can be reproduced in sound:

<input type="checkbox"/>	listen to the sound-track (audio cassette)	<input type="checkbox"/>	Transcription of soundtrack* (written or printed document)
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4. If record is held on computer or electronic format:

<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	Printed copy of information derived from the record*	<input type="checkbox"/>	copy in electronic readable listenable form*
<input type="checkbox"/>				YES	NO
<input type="checkbox"/>				*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.	

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 requester must sign all the additional folios.***

Indicate which right is to be exercised or protected: _____

Explain why the record requested is required for the exercise 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 wish to be informed of the decision regarding your request for access to the
record: _____

SIGNED at _____ this _____ day of _____ 20_____

**SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE**

PLEASE PRINT FOR ACCURATE IDENTIFICATION PURPOSES