

PROMOTION OF ACCESS TO INFORMATION MANUAL

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ACCESS TO INFORMATION

Manual prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 (“the Act” or the “PAIA”)

Huge Group Limited (registration number 2006/023587/06) (**Huge Group or the Group**) is a public company listed on the Johannesburg Stock Exchange. The Group operates as a provider of telecommunications, technology and media services through various subsidiaries and associates. The information contained herein applies to Huge Group and its subsidiaries, being Huge Telecom Proprietary Limited, Huge Mobile Proprietary Limited, Huge Software Proprietary Limited, Huge Cellular Proprietary Limited and Eyeballs Mobile Advertising Proprietary Limited, as well as its associate companies, being Le Gacy Telecom (FRA) Proprietary Limited and Ambient Mobile Proprietary Limited (collectively **the Companies**).

The information listed in this manual is available from the Companies by means of a request as prescribed in section 53 of the Act. Requests must be addressed to the Information Officer at the address and / or contact details as listed in Paragraph 1 below. All request fees (if any) as prescribed in section 54 of the Act, must be paid before any request is processed.

The Companies reserve the right to refuse information where it falls under a specific exemption as set out in sections 62 – 70 of the Act.

Whilst the Companies endeavour to ensure that the published information is accurate, complete and updated on a regular basis, no representation is made regarding the fitness of such information.

Paragraph 1 (section 51 (1)(a))

Name of company	Huge Group Limited
Information Officer	David Deetlefs
Telephone	011 603 6000
Telefax	086 298 4625
E-mail address	informationofficer@hugetelecom.co.za
Street address	146a Kelvin Drive, Woodmead, 2191
Postal address	PO Box 1585, Kelvin, 2054
Website	www.hugegroup.com

Paragraph 2 (section 51 91)(b))

A manual has been compiled by the South African Human Rights Commission as required in terms of section 10 of the Act. The guide contains information required by a person wishing to exercise or protect any right as contemplated by the PAIA.

The guide, in all eleven official South African languages, is available from the South Africa Human Rights Commission: PAIA Unit, at www.sahrc.org.za, or in writing at Private Bag 2700, Houghton, 2041, or telephonically on +27 11 484 8300, or via telefax on +27 11 484 0582.

Paragraph 3 (section 51 (1)(c))

As at the time of publication of this Manual. the Minister had not published any description of records available without a person having to request access in terms of this Act as provided for in terms of section 52 (2).

Paragraph 4 (section 51 (1)(d))

Records are kept in terms of the following legislation and as required by the Companies:

- Companies Act, 71 of 2008
- Income Tax Act, 58 of 1962
- Value Added Tax Act, 89 of 1991
- Employment Equity Act, 55 of 1998
- Electronic Communications Act, 36 of 2005
- Occupational Health and Safety Act, 85 of 1993
- Pension Funds Act, 24 of 1956
- Unemployment Insurance Act, 63 of 2001
- Labour Relations Act, 66 of 1995
- Basic Conditions of Employment Act, 75 of 1997
- Skills Development Levies Act, 9 of 1999
- Skills Development Act, 97 of 1998
- JSE Listings Requirements

Paragraph 5 (section 51 (1)(e))

The following information and records are held by the Companies as applicable and required:

Corporate Governance

- Memorandum of Incorporation
- Company Register
- Share Registers
- Board Reports
- Minutes of meetings
- Board Resolutions
- Board and Committee meeting Attendance Registers

Compliance

- Licence compliance – ECNS licence
- Stock Exchange News Service announcements

Human Resources

- Human Resources Policies and Procedures
- Service Agreements with employees
- Employee Records
- Remuneration and Benefits
- Employment Equity Reports
- Skills Development Reports
- Occupational Health and Safety Records

Financial

- Financial records of transactions
- Financial reports and management statistics
- Annual Financial Statements

Legal

- Commercial Contracts
- Insurance Policies
- Details of finalised litigation

Customer Information

- Customer Contracts and Details
- Customer Billings and Payments
- Customer Interaction Records
- Call Data Records

Supplier Information

- Contracts with suppliers
- Purchase Orders
- Suppliers Invoices and Payments

Network Operations

- Equipment comprising the Companies' networks deployed at customer sites
- Scoping Documents

Paragraph 6 – who may request information in terms of the Act (section 50)

Section 50 of the Act provides that a person may only request information in terms of the Act if the information is required for the exercise or protection of a right.

Information will therefore not be furnished unless a person clearly provides sufficient particulars to enable the Companies to identify the right which the requester is seeking to protect, as well as an explanation of why the requested information is required for the exercise or protection of that right.

Paragraph 7 – request procedure and fees (sections 53 – 61)

Any request for information in terms of the Act must be submitted using Form C, which form is available on the website www.hugegroup.com under the PAIA section.

Form C must be completed in full in order for the Companies to consider and decide on the request. Proof of identity is required in order to authenticate the request and the requester, and a certified copy of the identity document must therefore be submitted with Form C.

The Companies are entitled to levy a charge to recover the cost of processing a request and providing access to records. The fees that may be charged have been published by the Minister of Justice and are set out on the website www.hugegroup.com under the PAIA section.