

REBONI FURNITURE FACTORY (PTY) LTD

PAIA MANUAL

In terms of Section 51 of the Promotion of Access to Information Act 2 of 2000

Last review date: 22 June 2026

1. THE PURPOSE

This Manual has been prepared in accordance with the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA"). The purpose of this Manual is to provide information regarding the records held by Reboni Furniture Factory (Pty) Ltd ("the Company"), to set out the procedures that must be followed when requesting access to such records, and to give effect to the constitutional right of access to information, subject to any limitations provided for in law.

Reboni Furniture Factory (Pty) Ltd is a South African manufacturer and supplier of educational, office, healthcare, laboratory and institutional furniture. The Company designs, manufactures and distributes furniture solutions to customers throughout South Africa and other African markets. In conducting its business, the Company creates and maintains various records relating to its corporate governance, manufacturing operations, employees, customers, suppliers and other business activities.

2. INTRODUCTION

Reboni Furniture Factory (Pty) Ltd ("the Company") is a private company incorporated in accordance with the laws of the Republic of South Africa. The Company is engaged in the manufacture and distribution of educational, office, healthcare, laboratory and institutional furniture and related products and services.

In the ordinary course of its business, the Company collects, processes, stores and maintains information relating to its shareholders, directors, employees, customers, suppliers, contractors, service providers, business partners and other stakeholders for purposes associated with the administration, management and operation of its business activities.

This Manual has been prepared in accordance with the provisions of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA") and takes into account the requirements of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA"). The purpose of this Manual is to promote transparency and accountability and to provide guidance regarding the records held by the Company and the process to be followed when requesting access to such records.

3. COMPANY CONTACT DETAILS [Section 51 (1) (a)]

Information Officer: Byron John Donaldson

Postal Address: PO Box 13576, Clubview, 0014

Telephone: +27 (0)12 661 4141

Email Address: byron@reboni.co.za

Deputy Information Officer: Joan Wiid

Postal Address: PO Box 1240, Mogwase, 0314

Telephone: +27 (0)14 558 2748

Email Address: joan@reboni.co.za

Website: www.reboni.co.za

4. THE ACT [Section 51 (1) (b)]

4.1 The Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA") gives effect to the constitutional right of access to information held by the State and by private bodies where such information is required for the exercise or protection of any rights.

4.2 In terms of section 10 of PAIA, the Information Regulator has compiled a Guide on how to use PAIA. The Guide is available in all official languages and may be obtained from the Information Regulator.

4.3 The contact details of the Information Regulator are as follows:

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017

Telephone: +27 (0)10 023 5200

Website: <https://infoeregulator.org.za/>

Email: infoereg@justice.gov.za

Complaints: PAIAComplaints@infoeregulator.org.za

5. APPLICABLE LEGISLATION [Section 51 (1) (c)]

NO.	REF	ACT
1.	75 of 1997	Basic Conditions of Employment Act
2.	53 of 2003	Broad-Based Black Economic Empowerment Act
3.	71 of 2008	Companies Act
4.	130 of 1993	Compensation for Occupational Injuries and Diseases Act
5.	68 of 2008	Consumer Protection Act
6.	98 of 1978	Copyright Act
7.	25 of 2002	Electronic Communications and Transactions Act
8.	55 of 1998	Employment Equity Act

9.	58 of 1962	Income Tax Act
10.	66 of 1995	Labour Relations Act
11.	85 of 1993	Occupational Health and Safety Act
12.	2 of 2000	Promotion of Access to Information Act
13.	4 of 2013	Protection of Personal Information Act
14.	97 of 1998	Skills Development Act
15.	28 of 2011	Tax Administration Act
16.	194 of 1993	Trade Marks Act
17.	63 of 2001	Unemployment Insurance Act
18.	4 of 2002	Unemployment Insurance Contributions Act
19.	89 of 1991	Value-Added Tax Act

6. SCHEDULE OF RECORDS [Section 51 (1) (d)]

RECORDS	SUBJECT	AVAILABILITY
Corporate and Governance Records	• Certificate of Incorporation • Memorandum of Incorporation • Statutory records and registers • Share registers and beneficial ownership records • Board and shareholder resolutions • Minutes of meetings • Corporate governance records	Request in terms of PAIA
Financial Records	• Annual Financial Statements • Accounting records • Tax records • VAT records • Asset registers • Banking records • Financial reports and supporting documentation	Request in terms of PAIA
Manufacturing and Operational Records	• Production records • Manufacturing specifications and processes • Product design and technical records • Quality control and quality assurance records • Inventory and warehouse records • Procurement records • Production planning records • Operational reports	Request in terms of PAIA
Customer and Sales Records	• Customer agreements and records • Quotations and sales records	Request in terms of PAIA

	• Purchase orders • Customer correspondence • Product warranties and service records • Customer support records	
Supplier and Procurement Records	• Supplier agreements • Supplier due diligence records • Procurement records • Purchase agreements • Supplier correspondence • Tender and sourcing records	Request in terms of PAIA
Contractual Records	• Service agreements • Commercial agreements • Contractor agreements • Lease agreements • Professional adviser agreements • Other contractual records	Request in terms of PAIA
Human Resources Records	• Employment contracts • Payroll records • Leave records • Personnel records • Recruitment records • Training records • Performance management records • Disciplinary records	Request in terms of PAIA
Health and Safety Records	• Occupational health and safety records • Incident and accident reports • Risk assessments • Safety policies and procedures • Compliance inspections and reports	Request in terms of PAIA
Information Technology Records	• Information technology policies • Electronic communications • Website administration records • System access records • Information security records • Data backup and recovery records	Request in terms of PAIA
Legal and Compliance Records	• Litigation records • Legal opinions • Insurance records • PAIA records • POPIA compliance records • Regulatory correspondence • Intellectual property records	Request in terms of PAIA

Note: Records may be maintained at the Company's registered office and/or by authorised service providers acting on behalf of the Company. Access to records is subject to the provisions of PAIA and any applicable grounds for refusal contained therein.

7. PROCEDURE FOR REQUEST FOR ACCESS (SECTIONS 53)

- 7.1 The requester must comply in full with all the procedural requirements as set out in the Act and this Manual, relating to the request for access to a record. Failure to do so may affect the processing of the request or result in the request being refused in accordance with PAIA.
- 7.2 The requester must complete the prescribed form attached as **Appendix 1** and submit the completed form together with payment of the request fee (if applicable) and a deposit (if applicable) to the Information Officer at the postal or physical address or electronic mail address under **SECTION 3** of this Manual.
- 7.3 The prescribed form must be completed with enough particulars to at least enable the Information Officer to identify:
- The records requested;
 - The identity of the requester;
 - Which form of access to the records is required, should the request be granted; and
 - The postal address or email address of the requester.
- 7.4 The requester must identify the right sought to be exercised or protected and explain why the requested record is required for the exercise or protection of that right.
- 7.5 The requester must indicate if the requester, in addition to being informed in writing whether access to the record has been granted, wishes to be informed of the decision of the request in any other manner. If so, the requester must state the manner with full particulars.
- 7.6 If the request is made on behalf of another person, then in such event, the requester must submit proof of the capacity in terms of which the requester is making the request to the reasonable satisfaction of the Information Officer.
- 7.7 Should an individual be unable to complete the prescribed form because of illiteracy, disability or any other reason, such individual may submit the request orally to the Information Officer.
- 7.8 The requester must pay the prescribed fee (if applicable) before any further processing can take place.
- 7.9 The Information Officer will notify the requester, within 30 days of receipt of the request, whether access to the requested record has been granted or refused.

- 7.10 The 30 day period may be extended with a further period of not more than 30 days if the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities, or the records are not located at the premises, or consultations with another private body or third party are required.
- 7.11 Should the request be granted, the written notice must state the access fee (if any) to be paid upon access, the form in which access will be given and that the requester may lodge an application with a Court against the access fee to be paid or the form of access granted, and the procedure for lodging such application.
- 7.12 Should the request be refused, the notice must state adequate reasons for the refusal, including the provisions of the Act relied upon, and state that the requester may lodge an application with a Court against the refusal of the request, and the procedure (including the period) for lodging the application.

8. PRESCRIBED FEES [Section 54]

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

- 8.1 A requester may be required to pay the prescribed request fee (if applicable) before a request is processed;
- 8.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (being not more than one third of the access fee which would be payable if the request were granted);
- 8.3 A requester may lodge an application with a competent court against the payment of the request fee and/or deposit.
- 8.4 Records may be withheld until the fees have been paid.
- 8.5 The applicable request fees and access fees are prescribed in terms of the PAIA Regulations, 2021, as amended from time to time (**Appendix 2**).

9. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS (CHAPTER 4 OF THE ACT)

Apart from the provisions of Chapter 4 of PAIA and subject to the provisions of section 70 of PAIA, the main grounds upon which a request for access to records may be refused include the following:

9.1 Protection of Personal Information of Third Parties

Access to a record may be refused where disclosure would involve the unreasonable disclosure of personal information relating to a natural person who is a third party.

9.2 Protection of Commercial Information of Third Parties

Access to a record may be refused where the record contains:

- trade secrets of that third party;
- Financial, commercial, scientific or technical information, the disclosure of which could reasonably be expected to cause harm to the commercial or financial interests of that third party; or
- Information disclosed in confidence by a third party, the disclosure of which could place that third party at a disadvantage in contractual or other negotiations or prejudice that third party in commercial competition.

9.3 Protection of Confidential Information

Access to a record may be refused where the disclosure would constitute a breach of a duty of confidence owed to a third party in terms of an agreement.

9.4 Protection of the Safety of Individuals and Property

Access to a record may be refused where disclosure could reasonably be expected to endanger the life or physical safety of an individual or prejudice or impair the security of property.

9.5 Protection of Privileged Records

Access to a record may be refused where the record is privileged from production in legal proceedings, unless the person entitled to the privilege has waived such privilege.

9.6 Protection of the Commercial Information and Activities of the Company

Access to a record may be refused where the record contains:

- Trade secrets of the Company;
- Financial, commercial, scientific or technical information, the disclosure of which could reasonably be expected to cause harm to the commercial or financial interests of the Company;

- Information which, if disclosed, could place the Company at a disadvantage in contractual negotiations or commercial competition; or
- A computer program owned by the Company and protected by copyright.

9.7 Public Interest Override

Notwithstanding any provision of this Manual, access to a record may not be refused where the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in the disclosure of the record clearly outweighs the harm contemplated in the applicable ground of refusal.

10. RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If, after all reasonable steps have been taken to locate a record, the Company is satisfied that the record cannot be found or does not exist, the requester will be notified by way of an affidavit or affirmation setting out the steps taken to locate the record.

11. THIRD PARTY INFORMATION

11.1 The Company may be required, in accordance with PAIA, to notify the third party concerned of the request and afford such third party an opportunity to make representations regarding the disclosure of the requested record.

11.2 In the event of the third-party furnishing reasons supporting or opposing access, the Information Officer will consider these reasons in determining whether access should be granted, or not.

12. REMEDIES AVAILABLE IN REFUSAL OF A REQUEST FOR INFORMATION (PART 4 OF THE ACT)

12.1 The Company does not have internal appeal procedures and accordingly, the decision of the Information Officer shall be final.

12.2 Therefore, should the requester be dissatisfied with the Information Officer's decision to refuse access, that person may within the period prescribed by PAIA apply to a Court for the appropriate relief.

12.3 Should a third party be dissatisfied with the Information Officer's decision to grant a request for information relating to that third party, it (the third party) may within the period prescribed by PAIA, apply to a Court for the appropriate relief.

13. OTHER INFORMATION AS MAY BE PRESCRIBED UNDER SECTION 51(1)(f) OF PAIA

The Minister of Justice and Constitutional Development has not made any regulation in this regard.

14. AVAILABILITY OF THE MANUAL UNDER SECTION 51(3) OF THE ACT (SECTION VI)

This Manual is available for inspection, free of charge, at the registered offices of the Company during normal business hours.

A copy of this Manual may be obtained from the Information Officer upon request.

The Manual may also be made available through the Reboni website and may be submitted to the Information Regulator in such manner as may be prescribed by applicable legislation from time to time.

15. SECTION VII: COMPLIANCE WITH THE PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

The Company is committed to processing personal information in accordance with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA").

The Company may collect, process, store and maintain personal information relating to its shareholders, directors, employees, customers, suppliers, service providers, contractors, business partners and other stakeholders for purposes associated with the administration, management and operation of its business, including manufacturing, procurement, sales, customer service, contractual relationships, human resources administration, compliance with legal and regulatory obligations, and the legitimate operation of its business.

Personal information may be collected through correspondence, agreements, statutory records, financial records, employment records, customer records, supplier records, procurement records, corporate governance records and other business documentation.

Records may be stored electronically and/or in physical format. Appropriate technical and organisational measures are implemented to protect personal information against loss, unauthorised access, disclosure, alteration or destruction.

Personal information may be disclosed to authorised third parties where required by law, for regulatory purposes, in fulfilment of contractual obligations, for the provision of business services, or where necessary for the legitimate operation of the Company's business.

The Company does not intentionally transfer personal information outside the Republic of South Africa unless such transfer is authorised by law, required for legitimate business purposes, or appropriate safeguards have been implemented in accordance with POPIA.

This PAIA Manual will be reviewed and updated periodically to ensure continued compliance with applicable legislation.

Appendix 1

ANNEXURE A — FORM 2

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Form 2 — Regulation 7 of the PAIA Regulations, 2021)

NOTE:

1. Proof of identity must be attached to this request.
2. If the request is made on behalf of another person, proof of the requester's authority to request on that person's behalf must be attached.

TO:

The Information Officer

Reboni Furniture Factory (Pty) Ltd

Attention: Byron John Donaldson

Postal Address:

PO Box 13576

Clubview

0014

Physical Address:

5 Display Gardens

Gateway Industrial Park, Sarel Baard Crescent

Centurion

0157

Email:

byron@reboni.co.za

Telephone:

+27 (0)12 661 4141

Mark with an "X":

- ☐ Request is made in my own name
- ☐ Request is made on behalf of another person

A. PARTICULARS OF PERSON REQUESTING ACCESS

1. *Full names and surname:* _____
2. *Identity number / Registration number (if juristic person):* _____
3. *Postal address:* _____
4. *Street address (if different):* _____
5. *Telephone number (work / home / cell):* _____
6. *E-mail address:* _____
7. *Capacity in which request is made (if on behalf of another person):* _____

If the request is made on behalf of another person:

- Full names of person on whose behalf request is made: _____
 - Identity number of that person: _____
 - Proof of authority to act on behalf of that person must be attached.
-

B. PARTICULARS OF RECORD(S) REQUESTED

1. Provide full particulars of the record(s) to which access is requested, including reference number, dates, file references, and any other detail that will assist the private body to identify the record(s):

2. If the space provided is inadequate, please continue on a separate page and attach.
-

C. FORM OF ACCESS REQUIRED

Mark the appropriate box with an X:

- ☐ Inspection of record
- ☐ Copy of record (hard copy)
- ☐ Copy of record (electronic / email) — provide email address: _____
- ☐ Transcription of record, or part of record (if applicable) — specify format: _____
- ☐ Other (specify): _____

If the record is to be posted to you, please indicate the postal address: _____

D. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

Which right is to be exercised or protected? _____

Explain why the record is required for the exercise or protection of that right (give succinct grounds):

E. NOTICE OF DECISION REGARDING REQUEST

If you are notified of a decision regarding this request, in which form would you prefer to be notified?

☐ Written (post) ☐ E-mail ☐ Other (specify) _____

Preferred language of reply (if applicable): _____

F. FEES

1. A request fee (where applicable) must be paid before the request will be processed in terms of the Regulations. The fee payable is prescribed by the Regulations and/or the relevant Schedule (Annexure) and depends on the nature of the request (see PAIA Regulations and Annexure A fee schedule).

2. If access is granted, an access fee (for reproduction, search and preparation, postage, etc.) may be payable. The requester will be informed of any fees due and payment instructions in the outcome notice.

G. SIGNATURE

Signed at _____ on this _____ day of _____ 20____.

Signature of requester / person on whose behalf request is made

Attach: Proof of identity (ID document or company registration documents), and where applicable proof of authority to act.

H. OFFICIAL USE (To be completed by the Information Officer)

Date request received: _____

Reference number: _____

Request fee paid (if applicable): _____

Date acknowledged: _____

Additional information requested: _____

Extension notice issued (if applicable): _____

Outcome of request: _____

Access fee payable (if applicable): _____

Date of final response: _____

Signature of Information Officer:

APPENDIX 2

Annexure B

Fees

Fees in respect of public bodies

Item	Description		Amount
1.	The request fee payable by every requester		R100.00
2.	Photocopy of A4-size page		R1.50 per page or part thereof.
3.	Printed copy of A4-size page		R1.50 per page or part thereof.
4.	For a copy in a computer-readable form on:		
	(i)	Flash drive (to be provided by the requestor)	R40.00
	(ii)	Compact disc	
		• If provided by requestor	R40.00
		• If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page		Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images		
7.	Transcription of an audio record, per A4-size page		R24.00
8.	Copy of an audio record on:		
	(i)	Flash drive (to be provided by the requestor)	R40.00

SCHEDULE 1**RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION**

NO.	REF	ACT
1	75 of 1997	Basic Conditions of Employment Act
2	53 of 2003	Broad-Based Black Economic Empowerment Act
3	71 of 2008	Companies Act
4	130 of 1993	Compensation for Occupational Injuries and Diseases Act
5	68 of 2008	Consumer Protection Act
6	98 of 1978	Copyright Act
7	25 of 2002	Electronic Communications and Transactions Act
8	55 of 1998	Employment Equity Act
9	58 of 1962	Income Tax Act
10	66 of 1995	Labour Relations Act
11	85 of 1993	Occupational Health and Safety Act
12	2 of 2000	Promotion of Access to Information Act
13	4 of 2013	Protection of Personal Information Act
14	97 of 1998	Skills Development Act
15	28 of 2011	Tax Administration Act
16	194 of 1993	Trade Marks Act
17	63 of 2001	Unemployment Insurance Act
18	4 of 2002	Unemployment Insurance Contributions Act
19	89 of 1991	Value-Added Tax Act

SCHEDULE 2

SECTION IV:

ACCESS TO RECORDS HELD

INFORMATION REQUIRED UNDER SECTION 51(1)(c) AND SECTION 51(1)(e) OF THE ACT:

1. RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS IN TERMS OF THE ACT IN TERMS OF SECTION 52(2) (SECTION 51(1)(c):

No records are automatically available without a request in terms of PAIA.

2. RECORDS WHICH MAY BE REQUESTED UNDER SECTION 51(1)(e) OF THE ACT:

2.1 Corporate and Governance Records

- Certificate of Incorporation
- Memorandum of Incorporation
- Statutory records and registers
- Share registers and beneficial ownership records
- Board and shareholder resolutions
- Minutes of meetings
- Corporate governance records

2.2 Financial Records

- Annual Financial Statements
- Accounting records
- Tax records
- VAT records
- Asset registers
- Banking records
- Financial reports and supporting documentation

2.3 Manufacturing and Operational Records

- Production records
- Manufacturing specifications and processes
- Product design and technical records
- Quality control and quality assurance records
- Inventory and warehouse records
- Procurement records
- Production planning records
- Operational reports

2.4 Customer and Sales Records

- Customer agreements and records
- Quotations and sales records
- Purchase orders
- Customer correspondence
- Product warranties and service records
- Customer support records

2.5 Supplier and Procurement Records

- Supplier agreements
- Supplier due diligence records
- Procurement records
- Purchase agreements
- Supplier correspondence
- Tender and sourcing records

2.6 Contractual Records

- Service agreements
- Commercial agreements
- Contractor agreements
- Lease agreements
- Professional adviser agreements
- Other contractual records

2.7 Human Resource Records

- Employment contracts
- Payroll records
- Leave records
- Personnel records
- Recruitment records
- Training records
- Performance management records
- Disciplinary records

2.8 Health and Safety Records

- Occupational health and safety records
- Incident and accident reports
- Risk assessments
- Safety policies and procedures
- Compliance inspections and reports

2.9 Information Technology Records

- Information technology policies
- Electronic communications
- Website administration records
- System access records
- Information security records
- Data backup and recovery records

2.10 Legal and Compliance Records

- Litigation records
- Legal opinions
- Insurance records
- PAIA records
- POPIA compliance records
- Regulatory correspondence
- Intellectual property records