

Gold Circle (Pty) Ltd
1998/024366/07

A Guide to

ACCESSING OUR INFORMATION

Our Manual in terms of Section 51 of the
Promotion of Access to Information Act
No.2 of 2000

Preamble

The Promotion of Access to Information Act No.2 of 2000, ("the Act") came into operation on the 23 November 2001. Section 51 of this Act requires that the company, as a private body, to compile a manual giving information to the public regarding the procedure to be followed in requesting information from Gold Circle for the purpose of exercising or protecting rights.

Introduction to this Private Body

Gold Circle (Pty) Ltd has as its primary focus the promotion and advancement of thoroughbred horse racing in KwaZulu-Natal. This includes, but is not limited to

- the hosting of race meetings;
- the provision and management of training facilities;
- the fostering of a thoroughbred breeders incentive scheme;
- the participation in a partnership with Phumelela Gaming and Leisure Limited for the provision of a horse racing TV channel;
- the provision of totalisator betting facilities through a telephone betting centre, a web based betting site, together with branches and agencies geographically located throughout the province of KwaZulu-Natal;
- Fiduciary, administrative and secretarial services for a number of subsidiary companies, clubs, and racing associations, namely:
 - Natal Racing Properties (Pty) Ltd
 - Gold Circle Gaming Investments (Pty) Ltd
 - Durban Turf Club
 - Clairwood Turf Club
 - Gold Circle Racing Club
 - KwaZulu-Natal Racing Association

Other interests include an equity holding in Track and Ball (Pty) Ltd, a fixed odds betting operation domiciled in KwaZulu-Natal with a number of licences to trade in the province.

This manual has been compiled, not only to comply with the provisions of the Act, but also to foster a culture of transparency and accountability and to ensure that members of the public have effective access to information in the company's possession which will assist them in the exercise and protection of their rights.

A copy of this manual is also available on our Website. The address is www.goldcircle.co.za.

Section A

Our Details

Full Name	:	Gold Circle (Pty) Ltd
Registration Number	:	1998/024366/07
Registered Address	:	150 Avondale Road, Greyville Durban 4001
Postal Address	:	KwaZulu-Natal 4001 P O Box 40 Durban 4000
Telephone Number	:	031 314 1500
Contact	:	Company Secretary
Fax Number	:	031 314 1767
Website	:	www.goldcircle.co.za

Section B

Information Available in Terms of the Act

1. Categories of Information

The company holds the following categories of information:

A. ADMINISTRATION/SECRETARIAL

- (I) Certificate of Incorporation;
- (II) Certificate of Change of name;
- (III) Memorandum of Incorporation;
- (IV) Certificate of Commencement of Business;
- (V) Minute Book, CM26 and CM27 and resolutions passed at general meetings;
- (VI) Register of Members;
- (VII) Register of Mortgages and Debentures;
- (VIII) Register of Directors' Shareholdings and Interests;
- (IX) Register of Directors and Officers;
- (X) Directors' Attendance Register;
- (XI) Immovable Property:
 - a) Title deeds;
 - b) Leases and subleases;
 - c) Building plans;
 - d) Mortgage bonds or other encumbrances to fixed property;
 - e) Details of registered Servitudes and Wayleave agreements;
- (XII) Intellectual Property
 - a) Trademarks, trade names and protected names;
 - b) Copyrights;
- (XIII) Agreements and Contracts:
 - a) Material agreements concerning provision of services or material;
 - b) Partnership agreements;
 - c) Sponsorship agreements;
 - d) Commingling agreements;
 - fe Agreements with shareholders, officers or directors;

- g) Acquisition documentation;
- h) Agreements with totalisator agents;
- i) Purchase or lease agreements;
- j) Sales agreements;
- k) Satellite broadcast agreements;

B. FINANCIAL

- (I) Group Annual Financial Statements including:
 - a) Annual Accounts;
 - b) Directors' Reports;
 - c) Auditors' Report;
- (II) The Books of Account regarding information required by Companies Act, 1973 (Computerized);
- (III) Supporting schedules to books of account and ancillary books of account;
- (IV) Books of Account including books of prime entry;
- (V) Orders, invoices, credit notes, statements, receipts, vouchers;
- (VI) Movable Property:
 - a) Assets register;
 - b) Finance and lease agreements;
- (VII) Taxation:
 - a) Copies of all Income Tax Returns and related correspondence;
 - b) VAT returns and related correspondence;
- (VIII) Insurance:
 - a) Details of Insurance Policies;
 - b) Claims records;
- (IX) Wagering:
 - a) Statistics, dividends, etc.;

C. HUMAN RESOURCES

- (I) Collective Agreements;
- (II) Arbitration awards;
- (III) Records of strikes, lockouts or protest action
- (IV) Industrial training records;
- (V) Employee contracts of employment;
- (VI) Incentive schemes;
- (VII) Recruitment & selection policy & records
- (VIII) Skills Development Plan;

- (IX) Maternity leave policy;
- (X) Code of conduct – including disciplinary and grievance procedures;
- (XI) Employment Equity Plan;
- (XII) Group Policies & Procedures – Various;

D. OCCUPATIONAL SAFETY

- (I) Safety management systems, Training and audits;
- (II) Employee public health emergency action plans;
- (III) Permits, licences, approval and registrations for operation of sites and businesses, Certificates of Compliance;
- (IV) Health & Safety Committee Meeting Minutes;
- (V) Incident & Accident Investigation Reports;
- (VI) Emergency Response Plans;
- (VII) Lift & Escalator Reports;
- (VIII) Register of First Aid;
- (IX) Register of Fire Fighters;
- (X) Workmen's Compensation Reports;

E. OPERATIONAL

Transportation:

- a) Details of horse transport fleet ;
- b) Roadworthy certification;

F. PAYROLL AND EMPLOYEE RECORDS

- (I) Employees' name and occupation;
- (II) Time worked by each employee;
- (III) Remuneration Paid to each employee;
- (IV) Date of birth of each employee;
- (V) Computerized wage and salary register;
- (VI) Staff records;
- (VII) Staff loan schemes;
- (VIII) Study assistance schemes;
- (IX) Expense accounts;
- (X) Tax returns of employees;

G. RETIREMENT FUNDING RECORDS

- (I) Pension fund rules;
- (II) Provident fund rules;
- (III) Minutes of meetings of trustees and members;
- (IV) Actuarial valuation reports;
- (V) Annual accounts;
- (VI) Records pertaining to the collapse of funds post amalgamation:

H. LEGAL

- (I) Complaints, pleading, briefs and other documentation pertaining to any actual, pending or threatened litigation, arbitration or investigation;
- (II) Settlement agreements;
- (III) Operational licences, permits and authorisations;

I. INFORMATION TECHNOLOGY

- (I) Hardware;
- (II) Operating and networking systems;
- (III) Software packages and licences;
- (IV) Disaster Recovery plan;
- (V) Telephone Exchange Equipment;
- (VI) Telephone lines, leased lines and Data lines;
- (VII) Gambling Board approval of Amtote Wagering System;

J. SALES AND MARKETING

- (I) Details of sponsors;
- (II) Brochures and fixtures information;

2. Procedure for requesting access to the above information

Should the public wish to request access to any of the above categories of information, they are requested to complete a request form as set out in annexure “A” hereto. These forms are available from:

- The Company Secretary;
- The South African Human Rights Commission Website (www.sahrc.org.za)
- The department of Justice and Constitutional Development Website (www.doj.gov.za)

The prescribed fee, which is payable in advance, for requesting and accessing information in terms of the Act is contained in the request form.

An additional fee, as prescribed by regulation, may be requested for search and compilation of the information which has been requested, including copying charges.

It is important to note that access is not automatic – members of the public must identify the right they are seeking to exercise or protect and explain why the record that has been requested is required. Applicants for information will be notified in the manner indicated on the request form whether as to whether the request has been approved.

Section C

Information Available in Terms of other Legislation

Where applicable to company operations, information is also available in terms of certain provisions of the following statutes:

- ◆ Basic Conditions of Employment Act
- ◆ Companies Act 2008
- ◆ Debt Collectors Act 114 of 1998
- ◆ Employment Equity Act No. 55 of 1998
- ◆ Financial Intelligence Centre Act No.38 of 2001
- ◆ Income Tax Act No. 58 of 1962
- ◆ Labour Relations Act No. 66 of 1995
- ◆ Occupational Health & Safety Act no. 85 of 1993
- ◆ Prevention of Organised Crime Act No. 121 of 1998
- ◆ Road Transportation Act No. 74 of 1977
- ◆ Unemployment Insurance Act No. 63 of 2001
- ◆ KwaZulu-Natal Gambling Act No. 10 of 1996
- ◆ Regulation of Racing and Betting Ordinance No.28 of 1957
- ◆ Liquor Act No. 27 of 1989
- ◆ Value-added Tax Act No. 89 of 1991

Section D

Information Automatically Available

The following categories of records are automatically available for inspection, purchase or photocopying without the need to request this information in terms of the Promotion of Access to Information Act.

- The Tabloid news letter;
- Pamphlets & brochures
- Posters
- Other literature intended for public viewing

Request forms for these categories of information are also available from the Public Relations Officer of the company.