

PROMOTION OF ACCESS TO INFORMATION ACT
SECTION 51 MANUAL FOR
MURRAY & ROBERTS HOLDINGS LIMITED
AND
THE MURRAY & ROBERTS GROUP

1. INTRODUCTION

This manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) (“the Act”). The Act gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right.

The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

This manual applies in respect of each member of the **Murray & Roberts Group in South Africa (“Murray & Roberts Group”)** as set out in this manual and as the **Murray & Roberts Group**. The information Officer named below is appointed in respect of the **Murray & Roberts Group** as a whole and in respect of each of the private bodies constituting the **Murray & Roberts Group**.

2. 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;
- “**Information Officer**” means the person acting on behalf of Murray & Roberts and discharging the duties and responsibilities assigned to the “head” of Murray & Roberts by the Act. The Information Officer is duly authorised to act as such and such authorisation has been confirmed by the “head” of Murray & Roberts in writing;
- “**Manual**” means this manual published in compliance with Section 51 of the Act;
- “**Murray & Roberts**” means Murray & Roberts Holdings Limited 1948/029826/06 and all South African registered subsidiaries and an associated entity being the Murray & Roberts Trust, as listed in Annexure 1 to this Manual and this Manual applies to all such entities, both jointly and severally. Murray & Roberts Holdings Limited and such entities are referred to both individually and collectively as “Murray & Roberts”;
- “**Personnel**” means any person who works for or provides services to or on behalf of Murray & Roberts and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Murray & Roberts. This includes without limitation, directors (both executive and non-executive), all permanent, temporary and part-time staff as well as consultants and contract workers;
- “**Record**” means any recorded information, regardless of form of medium, which is in the possession or under the control of Murray & Roberts, irrespective of whether it was created by Murray & Roberts;
- “**Request** ” means a request for access to a record of Murray & Roberts;
- “**Requestor**” means any person, including a public body or an official thereof, making a request for access to a record of Murray & Roberts 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.

Terms of defined in the Act shall have the same meaning in this Manual.

3. MURRAY & ROBERTS

Murray & Roberts has a long and proud heritage of more than a century and is today recognised as a multinational project life cycle group. It's the Group's vision, to be a leading multinational engineering and construction group that applies its project life cycle capabilities to optimise client's fixed capital investment. The Group achieves this by focusing its expertise and capacity on delivering sustainable project engineering, procurement, construction, commissioning, operations and maintenance solutions. The Group delivers its capabilities into three global primary market sectors: oil & gas; metals & minerals and power & water.

Positive long-term demand drivers including global population growth, rapid urbanisation and economic growth inform the Group's core focus on selected global natural resources market sectors. Although the Group is exposed to the cyclical nature of commodity demand, its business model is designed to diversify its growth potential through the cycle. The combination of portfolio, geographic and capability diversification provides a blend of revenue and earnings in our core market sectors.

The Group has an accomplished and diverse Board, with competencies aligned to the Group's strategy and deep collective experience, relevant to the macroeconomic and socioeconomic realities of our markets. An effective governance structure, aligned to King IV™, is in place and a clear organisational framework defines the relationships and decision-making rights between governing bodies and business platforms.

Underpinned by the highest standard of corporate governance, integrity and ethics are non-negotiable features of the Group's pursuit of its strategy and business conduct. As the highest governing authority in the Group, the Board is ultimately accountable for ethical and effective leadership. The Board is confident that the Group's governance processes support ethical culture, good performance, effective control and legitimacy.

4. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available on our website (www.murrob.com) or by sending a request for a copy to the Information Officer by email. The Manual may also be inspected at the address set out below. In addition, this manual can be accessed through the SAHRC at its address set out below. This Manual will be updated from time to time, as and when required.

5. HOW TO REQUEST ACCESS TO RECORDS HELD BY THE MURRAY & ROBERTS GROUP

Requests for access to records held by the **Murray & Roberts Group** must be made on the request forms that are available from the SAHRC website (www.sahrc.org.za) or the Department of Justice and Constitutional Development (www.doj.gov.za) (under "regulations").

For the convenience of requestors, copies of such forms are included in the version of this Manual available at our address set out below and on our website. Please note that requestors are also required to make payment of the prescribed fees. This issue is dealt with more fully below.

Requests for access to records must be made to our Information Officer at the address, telephone number or electronic mail address provided for below.

The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester.

If you are aware of the company within the Murray & Roberts Group that holds the record/s you are requesting, please indicate this fact clearly. Where you are unsure of the company name, please indicate this and give as much detail as possible 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.

The requester should also indicate which form of access is required and indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of 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 requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the **Murray & Roberts Group** Information Officer.

The standard form that must be used for the making of requests is attached as Annexure 2. Not using this form could cause your request to be refused (if you do not provide sufficient information or otherwise) or delayed.

The list detailing the prescribed fees in respect of requests and the fees in respect of access to records (if the request is granted) is attached as Annexure 3

Annexures 2 and 3 are included in copies of this Manual available on the **Murray & Roberts Group** website and head office but need not and are not included in the copy of this Manual delivered to the SAHRC.

Kindly note that all requests to the **Murray & Roberts Group** or any of its constituent companies will be evaluated and considered in accordance with the Act. Publication of this manual and describing the categories and subject matter of information held by the Murray & Roberts Group does not give rise to any rights (in contract or otherwise) to access such information or records except in terms of the Act.

6. CONTACT DETAILS

Name of Private Body	The Murray & Roberts Group
Designated Information Officer	Eduard Jardim
Email address of Information Officer	eduard.jardim@murrob.com
Postal address	P O Box 1000
	Bedfordview
	2008
Street address	Douglas Roberts Centre
	22 Skeen Boulevard
	Bedfordview
	2007
Phone number	011 456 6379

7. HOW TO ACCESS THE GUIDE AS DESCRIBED IN SECTION 10 OF THE ACT

The Please contact the SAHRC to obtain the guide. Their details are reflected below:

The South African Human Rights Commission:
PAIA Unit
The 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
E-mail: paia@sahrc.org.za

8. VOLUNTARY DISCLOSURE

Notices in terms of Section 52 are voluntary, yet the **Murray & Roberts Group** does make certain information freely available (without being obliged thereto), including the most recent Integrated Report of Murray & Roberts Holdings Limited. Other information relating to the **Murray & Roberts Group** is freely available on the **Murray & Roberts Group** website at www.murrob.com. Certain other information relating to the **Murray & Roberts Group** is also made available on such website from time to time as well as on various of the other websites operated by the **Murray & Roberts Group**. Promotional brochures relating to specific products and services are also published and distributed from time to time.

9. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

Information is available in terms of the following legislation to the persons or entities specified in such legislation:

General

- Protection of Personal Information Act, Act Nr 4 of 2013.
- Companies Act 61 of 1973 Income Tax Act 58 of 1962 Value Added Tax Act 89 of 1991 Labour Relations Act 66 of 1995 Basic Conditions of Employment Act 75 of 1997.
- Employment Equity Act 55 of 1998 Compensation for Occupational Injuries and Health Diseases Act 130 of 1993.
- Occupational Health & Safety Act 85 of 1993 Harmful Business Practices Act 23 of 1999.
- Protection of Businesses Act 99 of 1978 Skills Development Act 97 of 1998 Stamp Duties Act 77 of 1968 Skills Development Levels Act 9 of 1999 Unemployment Insurance Act 30 of 1966.
- Unemployment Contributions Act No. 4 of 2002 National Environmental Management Act 107 of 1998.
- Stock Exchange Control Act of 1985 and the rules and listings requirements of the JSE Securities Exchange authorised in terms thereof.

Temporary

From time to time the **Murray & Roberts Group** may accept liability to retain records under other legislation and to grant access thereto. This is dependent on contracts entered into by the **Murray & Roberts Group** and relate to specific companies within the **Murray & Roberts Group**, and are usually provided as a service to clients and of limited duration.

10. RECORDS HELD BY THE MURRAY & ROBERTS GROUP

We maintain records on the following categories and subject matters. **However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured.** All requests for access will be evaluated on a case by case basis in accordance with the provisions of the Act.

Please note further that many of the records held by us are those of third parties, such as customers and employees and we take the protection of third party confidential information very seriously. Please **ensure that requests for such records are carefully motivated to avoid rejection.**

10.1 Internal records

The following are records pertaining to the **Murray & Roberts Group** own affairs and those of its constituent companies:

- Memorandum and Articles of Association;

- Financial records;
- Operational records;
- Risk documentation;
- Intellectual property;
- Marketing records;
- Internal correspondence;
- Product records;
- Statutory records;
- Internal policies, procedures and standards;
- Minutes of meetings;
- Charters, codes of conduct and policies (both internal and external) to which the **Murray & Roberts Group** subscribes; and
- Records held by officials of the **Murray & Roberts Group**.

10.2 Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the **Murray & Roberts Group** and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the **Murray & Roberts Group**. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to us by our personnel;
- Any records a third party has provided to us about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Employment policies and procedures;
- Internal evaluation records; and
- Other internal records and correspondence.

10.3 Customer-related records

Customer-related information includes the following:

- Contracts with the customer and between the customer and other persons;
- Any records a customer has provided to the **Murray & Roberts Group** or a third party acting for or on behalf of the **Murray & Roberts Group** (including plans, specifications, approvals, licences, reports, intellectual property rights and the like);
- Any credit records or other research conducted by the **Murray & Roberts Group** in respect of its customers or research derived by the **Murray & Roberts Group** from its customers and their activities;
- Records, reports, designs and the like generated by the **Murray & Roberts Group** for its customers;
- Any records a third party has provided to the **Murray & Roberts Group** either directly or indirectly; and
- Records generated by or within the **Murray & Roberts Group** pertaining to the customer, including transactional records.

10.4 Other Parties

Records are kept in respect of other parties, including without limitation, joint ventures and consortia to which the **Murray & Roberts Group** is a party, contractors and subcontractors, suppliers, subsidiary/holding/sister companies, service providers, and general market conditions. In addition, such other parties may possess records which can be said to belong to the **Murray & Roberts Group**.

The following records fall under this category:

- Personnel, customer, **Murray & Roberts Group** records which are held by another party as opposed to being held by the **Murray & Roberts Group**; and
- Records held by the **Murray & Roberts Group** pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.

10.5 Other Records

Further records are held including:

- Information relating to the **Murray & Roberts Group's** own commercial activities;
- Procurement and administration for the **Murray & Roberts Group**; and
- Research information belonging to the **Murray & Roberts Group** or carried out on behalf of a third party.

	COMPANY NAME	REGISTRATION NUMBER
	<i>OPERATING COMPANIES</i>	
1.	Murray & Roberts Cementation (Pty) Limited	1954/003508/07
2.	Murray & Roberts Emgodini (Pty) Limited	1969/013437/07
3.	Murray & Roberts Holdings Limited	1948/029826/06
4.	Murray & Roberts Limited	1979/003324/06
5.	Murray & Roberts BCC Financing Company (RF) (Pty) Ltd	2018/286793/07
6.	Murray & Roberts BCC Holdco (Pty) Ltd	2018276557/07
	<i>OTHER SUBSIDIARIES</i>	
7.	African Bitumen Emulsion Properties (Pty) Limited	1930/002694/07
8.	Bombela Civils Joint Venture (Pty) Limited	2005/044155/07
9.	Bombela TKC (Pty) Limited	2005/040563/07
10.	Calshelf Investments 177 (Pty) Ltd	2007/025652/07
11.	Carwil (Pty) Ltd	1967/009184/07
12.	Concor Investments (Pty) Ltd	1983/006063/07
13.	D & H Piping Systems (Pty) Limited	1924/007942/07
14.	Darling & Hodgson (Pty) Limited	1973/008347/07

15.	Kusile Fabrication (Pty) Ltd	2010/003613/07
16.	Letsema Bokamoso General Staff Trust	IT9268/05
17.	Letsema Khanyisa Black Employee Benefits Trust	IT9266/05
18.	Letsema Sizwe Broad-Based Community Trust	IT9267/05
19.	Letsema Vulindlela Black Executives Trust	IT9265/05
20.	M & R Engineering Corporate Investments (Pty) Limited	1992/002180/07
21.	Medupi Fabrication (Pty) Ltd	2008/008331/07
22.	M & R Properties Asset Management (Pty) Limited	1979/003323/07
23.	Mexican Wave Investments (Pty) Limited	2003/021054/07
24.	MRE Trading (Pty) Limited	1962/002094/07
25.	Much Asphalt (E P) (Pty) Limited	1967/000710/07
26.	Murray & Roberts Building Products (Pty) Limited	1971/004151/07
27.	Murray & Roberts SADC (Pty) Limited	2001/001993/07
28.	Murray & Roberts Construction Western Cape (Pty) Ltd	2007/000006/07
29.	Murray & Roberts Contractors Group (Pty) Limited	1988/000325/07
30.	Murray & Roberts Contractors Holdings (Pty) Limited	1930/002173/07
31.	Murray & Roberts Engineering Solutions (Pty) Limited	1970/010666/07
32.	Murray & Roberts Investments Limited	1930/002092/06
33.	Murray & Roberts Letsema Khanyisa (Pty) Limited	2005/034236/07
34.	Murray & Roberts Letsema Sizwe (Pty) Limited	2005/034227/07
35.	Murray & Roberts Materials (Pty) Limited	1972/003840/07
36.	Murray & Roberts Projects (Pty) Limited	1979/003225/07
37.	Murray & Roberts Steel (Pty) Limited	1995/011191/07
38.	Murray & Roberts TL Shelf (Pty) Ltd	1992/002057/07
39.	Murray & Roberts Suppliers & Services (Pty) Limited	1958/001159/07
40.	Ocon Holdings (Pty) Ltd	2005/019624/07

41.	Oconbrick Manufacturing (Pty) Limited	1983/008310/07
42.	Peninsula Expressway Consortium (Pty) Limited	1996/009337/07
43.	Standard Engineering (Pty) Limited	1916/004912/07
44.	The Cementation Company (Africa) Limited	1926/008840/06
45.	Tollrail (Pty) Limited	2005/044158/07
46.	The Murray & Roberts Trust	IT4878
47.	Union Carriage & Wagon Company (Pty) Limited	1957/004105/07
48.	Union Carriage Investments (Pty) Limited	1967/011122/07
49.	William Bain & Company (S A) (Pty) Limited	1910/003648/07
50.	Wade Walker (Pty) Ltd	2000/030286/07