



MANUAL

OF

HUDACO INDUSTRIES LIMITED

REGISTRATION NUMBER 1985/004617/06)

("HUDACO")

in terms of

Section 51(1) of the Promotion of Access to
Information Act 2 of 2000 ("the Act")

THE PURPOSE

The purpose of this document is to serve as the Manual of Hudaco as required in terms of the Act, and to provide a reference as to the records held and the procedures that need to be followed to request access to such records

INTRODUCTION

Hudaco Industries is a South African group of companies specialising in the importation of high quality branded industrial and security products in the southern African region. The replacement market is a particular focus and the group is active in three main areas:

- Bearings and power transmission products;
- Powered products;
- Security equipment.

This Manual will cover the records held by Hudaco Industries pertaining to the company self and its respective operating subsidiaries and divisions.

Accordingly, the operating subsidiaries and divisions covered by this Manual are:

Bearings and Power Transmission Products

Bearings International

Mechanical Power Transmission

Abes Technoseal

Ambro Sales

Angus Hawken

Astore Africa

Belting Supply Services

Bosworth

Ernest Lowe

Electrical Power Transmission

Ampco

Bauer Geared Motors

Powermite

Varispeed

Powered Products

Deutz Dieselpower

Rutherford

Security Equipment

Elvey Security Technologies

Group Head office

Hudaco Industries

Hudaco Trading

For purposes of this Manual, Hudaco Industries and its subsidiaries and operating divisions will jointly be referred to as "the Group".

SECTION I:

CONTACT PERSON AND ADDRESS DETAILS OF HUDACO INDUSTRIES

(as required by Section 51(1)(a))

The Chief Executive Officer ("CEO") of Hudaco Industries, Mr SJ Connelly, has duly authorised the contact person below to ensure that the Act is complied with:

Contact Person: Ms R Wolmarans

Physical Address: Hudaco Park
 190 Barbara Road
 Elandsfontein

Postal Address: Private Bag 13
 Elandsfontein
 1406

Telephone: (011) 345 8200
Fax: 086 679 1115
e-mail address: reanaw@hudaco.co.za
Website : www.hudaco.co.za

SECTION II:

GUIDE ON HOW TO USE THE ACT

(as required by Section 51(1)(b), as read with Section 10)

The South African Human Rights Commission has compiled a guide, in terms of Section 10 of the Act, containing such information as may be reasonably be required by a person who wishes to exercise any right contemplated in the Act. This guide was published in the first half of 2005 and access to it, and to any amended versions thereof, can be found on the website of the South African Human Rights Commission at www.sahrc.org.za, or a hard copy can be obtained from them directly.

The Human Rights Commission's contacts details are as follows:

Physical Address: The South African Human Rights Commission
EAIA Unit
The Research and Documentation Department
29 Princess of Wales Terrace
Cnr York and St Andrews Street
Parktown

Postal address: Private Bag 2700
Houghton
2041

Telephone: (011) 484 8300
Fax: (011) 484 0582
e-mail address: PAIA@sahrc.org.za
Web site: www.sahrc.org.za

SECTION III:

CATEGORIES OF RECORDS AVAILABLE

(as required by Section 51(1)(c))

The following categories of records are automatically available without a person having to request access in terms of this Act:

1. Statutory records – all companies (whether private or public)

Memorandum of association
Articles of association
Certificate of incorporation
Certificate to commence business
Register of directors
Declarations of Directors' Interests
Form CM5 – reservation of name
Form CM7 – shortened form of name
Form CM8 – defensive names
Form CM9 – change of name
Form CM11 – increase in authorised capital
Form CM15 – allotment of shares
Form CM14A – repurchase of shares
Form CM18 – Registration of Court Orders
Form CM19 – redemption of preference shares
Form CM21 – where records are kept if not at registered office
Form CM22 – registered office
Form CM25 – waive period of notice of meeting
Form CM26 – special resolutions
Form CM27 – consent to act as a director
Form CM29 – directors and officers
Form CM31 – appointment/resignation of auditors
Form CM32 – change of year end
Form CM45 – conversion of one type of company to the other
Form CM52 – exemption to lodge annual financial statements

2. Listed company records available for inspection

Share register

Monthly download from STRATE.

Dividend register

Annual register as supplied by the transfer secretaries

Financial statements

Annual report

Interim report

Preliminary results

Trading updates published (profit forecasts)

JSE news (SENS)

Appointments/resignation of directors

Share dealings of directors

Dividend declarations

Announcements :

Rights offers

Mergers and acquisitions

Share placings

Claw-back offers

Scheme of arrangements

Prelisting statements

Corporate transactions

Circulars to shareholders
Notices of general meetings

Shareholders' meeting minutes

General meetings of the company
Annual general meeting of the company

3. Corporate communications

Press releases
Analyst presentations
Corporate mission statement

4. Human Resources

Employment Equity returns to the Dept of Labour
Work skills development plans submitted to relevant Sector Education and Training Authority (SETA)
Standard Terms and Conditions of Employment applicable to all Staff

5. Intellectual property

List of the Group's trademarks and registration numbers

6. Immovable property

Title deeds

7. Company investments

List of subsidiary companies, associates and joint ventures

8. Employee benefits

Hudaco Industries Group Pension Fund
Hudaco Industries Group Retirement Fund
Hudaco Industries Group Provident Fund
Topmed Medical Aid Scheme

As the above are separate entities, information pertaining to these entities must be requested direct from those funds themselves.

The administrators of the retirement funds are Absa Consultants and Actuaries.

9. Auditors

The company's auditors are Grant Thornton, 137 Daisy Street, Sandown, 2196..

10. Share Option Schemes.

11. Copies of the relevant trust deeds.

SECTION IV:

RECORDS AVAILABLE IN ACCORDANCE WITH LEGISLATION

(as required by Section 51(1)(d))

Records are available, where applicable, in accordance with the following current South African legislation (only to the extent that the relevant Act makes disclosure of records compulsory):

- The Occupational Health and Safety Act No. 29 of 1996;
- The Hazardous Substances Act No. 15 of 1973;
- The Health Act No. 63 of 1977;
- The Atmospheric Pollution Prevention Act No. 45 of 1965;
- The Compensation for Occupation Injuries and Diseases Act No. 130 of 1993;
- The Stock Exchanges Control Act No. 1 of 1985;
- The Value Added Tax Act No. 89 of 1991;
- The Income Tax Act No. 58 of 1962;
- The Companies Act No. 61 of 1973;
- Basic Conditions of Employment Act No. 75 of 1997;
- Employment Equity Act No. 55 of 1998;
- The Labour Relations Act No. 66 of 1985;
- Skills Development Act No. 97 of 1998;
- The Medical Schemes Act No. 131 of 1998;
- The Pension Funds Act No. 24 of 1956.

SECTION V:

DETAIL TO FACILITATE A REQUEST FOR ACCESS TO RECORDS

(as required by Section 51(1)(e))

Any request for access to records should be submitted on the prescribed form C (a copy of which is attached) which should be sent to the Contact Person whose name and address details appear in Section I hereof.

Hudaco Industries has in its possession the following categories of records on the subject matters referred to hereunder:

CATEGORIES AND RECORD SUBJECTS

Human Resources division

- Personnel information
- Training and development information
- General files containing information on employee benefits and employee recruitment and selection information;

Sales division

- List of products
- List of customers
- List of suppliers

Information Technology division

- Usage statistics
- Equipment details
- Costing of hardware and software

Accounts division

- Accounting Records
- Investment Records
- List of creditors and debtors
- Management Reports
- VAT Records
- PAYE Records
- Consolidation Records
- Internal Reports and Communications
- Register of fixed and leased assets
- Stock Records

Marketing division

- Company brochures and publications
- Documents relating to public relation events
- Company media releases

Companies division

- Contracts and agreements
- Pension, Provident and Retirement Fund Rules
- Medical Aid Fund Rules
- Company Policies
- Insurance records

SECTION VI:

ACCESS REQUEST PROCEDURE AND PRESCRIBED FEES

A request for access to records must be made in the prescribed Form C (a copy of which is attached) which should be sent to the address, fax number or electronic mail address.

Please note that an initial, non-refundable request fee of R57,00 (inclusive of VAT) is payable on submission. This fee is not applicable to personal requests, i.e. individual seeking access to records pertaining to those individuals themselves.

In the event that a request for access is successful an access fee will be payable for the search, reproduction and/or preparation of records and will be calculated based on the fee prescribed under the Act. The access fee must be paid prior to access being given to the requested record.

Request for information will be evaluated and the applicant will be notified within 30 days after receipt of the request in the prescribed format of the following:

Notification of extension period (if required)

Applicants must take note that in terms of the Act the 30 days period mentioned above may be extended for a further period of not more than 30 days under certain circumstances (details will be provided together with the notification of such extension);

The access fee and/or deposit

The applicant will be informed of the access fee (if any) which is payable for having access to the records. In addition, a deposit may be requested which is fully refundable in the event that the application is ultimately refused.

Decision on request

The applicant will be informed whether or not the application for access has been denied, or granted. In the event that it is granted the information referred to above pertaining to the access fee, any deposit payable and any other relevant matters will be advised. In the event that the applicant is refused the applicant will be given adequate reasons for the refusal and will be informed that the applicant may lodge an application with a Court against the refusal of the application, as well as the procedure (including the period) for lodging such application.

Grounds for refusal

The Group may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Group may refuse include:

- Protecting personal information that the Group hold about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- Protecting commercial information that the Group holds about a third party or the Group (for example trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of the Group or the third party);
- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;
- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Group;
- Disclosure of the record would put the Group at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- The record is a computer programme; and
- The record contains information about research being carried out or about to be carried out on behalf of a third party of the Group.

Records that cannot be found or do not exist

If the Group has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

Third party information

If access is requested to a record that contains information about a third party, the Group is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

In the event of the third party furnishing reasons for the support or denial of access, our designated contact person will consider these reasons in determining whether access should be granted, or not.

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

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

[Regulation 10]

A. PARTICULARS OF PRIVATE BODY

The Head:

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 fax number 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: _____

Fax number: _____

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

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity number: _____

D. PARTICULARS OF RECORD

- (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.
- (b) 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.**

1. Description of record or relevant part of the record: _____

2. Reference number, if available: _____

3. Any further particulars of record: _____

E. FEES:

- (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.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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.
- (d) If you qualify for exemption of the payment of any fee, please state the reason therefore.

Reason for exemption of payment for the fee: _____

F. FORM OF ACCESS TO THE RECORD:

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, state your disability and indicate in which form the record is required.

Disability _____	Form in which record is required _____
_____	_____
_____	_____
_____	_____

Mark the appropriate box with an "X"

NOTES:

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

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

copy of record*		inspection of record	
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2. If the record consists of visual images: (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)

view the images		copy of the images*		transcription of the images*	
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3. If the record consists of recorded words or information which can be reproduced in sound:

listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)	
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4. If the record is held on computer or in an electronic or machine-readable form:

printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)	
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<p>*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?</p> <p>Postage is payable.</p>	Yes	No
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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.

1. Indicate which right is to be exercised or protected: _____

2. Explain why the record requested is required for the exercise of 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 prefer 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