



**PROMOTION OF ACCESS TO INFORMATION ACT MANUAL**

**(“PAIA MANUAL”)**

**OF BRAVO BRANDS (PTY) LTD**

**Prepared in accordance with Section 51 of the Promotion of Access to  
Information Act, Number 2 of 2000 (“the Act”)**



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## **1. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT**

- 1.1 The Promotion of Access Information Act, No 2 of 2000 ("the Act") and related legislation such as the Protection of Personal Information Act, No 4 of 2013 ("POPIA"), provides the requester with the right of access to information held by public and private bodies, when the requester requests such information for the exercise or protection of any of your or another person's rights;
- 1.2 In terms of Section 51 of the Act, all Private Bodies are required to compile an Information Manual ("PAIA Manual");
- 1.3 Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/ or regulatory requirements, except where the Act expressly provides that the information may or must not be released. The Act sets out the relevant procedure to be adopted when requesting information from a Public or Private Body.

## **2. BRAVO BRANDS (PTY) LTD**

- 2.1. Bravo Brands (Pty) Ltd is Africa's largest branded lounge and sleep products manufacturer, with a diversified brand portfolio that includes market-leading and globally recognised brands;
- 2.2. In this PAIA Manual, any reference to "**Bravo**" includes any of the core brands listed below:

### **Lounge Division**

Grafton Everest  
Alpine  
Gommagomma  
La-Z-Boy

### **Sleep Division**

Edblo  
Sealy  
Slumberland  
King Koil

### **Bravo Flooring**

Nouwens

### **AND**

includes any of the entities listed below:

Bravo Brands (Pty) Ltd  
Bravo Group Manufacturing (Pty) Ltd  
Bravo Group Properties (Pty) Ltd  
Bravo Flooring (Pty) Ltd  
Bravo Lounge Alpine (Pty) Ltd  
Bravo Lounge iSithebe (Pty) Ltd  
Nouwens Carpets (Pty) Ltd

Registration number: 2007/012824/07  
Registration number: 1991/005029/07  
Registration number: 2006/018611/07  
Registration number: 2021/908148/07  
Registration number: 2024/615115/07  
Registration number: 2024/507437/07  
Registration number: 1962/004383/07

- 2.3. This PAIA Manual of Bravo Brands is available to view at its premises:

Cnr Main Reef Road & Avon Street  
Longdale Ext 2  
Johannesburg  
2093

### **AND**

is also available on its website [www.bravobrand.com](http://www.bravobrand.com)



### 3. PURPOSE OF THE PAIA MANUAL

- 3.1. The PAIA Manual is intended to ensure that Bravo complies with the Act and to foster a culture of transparency and accountability within Bravo by giving effect to the right to information that is required to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights;
- 3.2. In order to promote effective governance of juristic persons, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of the Act in order for them to exercise their rights in relation to public and private bodies;
- 3.3. Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
- 3.3.1. Limitations aimed at the reasonable protection of privacy;
  - 3.3.2. Commercial confidentiality; and
  - 3.3.3. Effective, efficient and good governance;
- and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution of the Republic of South Africa.
- 3.4. In addition, this PAIA Manual complies with the requirements of Section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its Regulations by Public and Private Bodies.

### 4. CONTACT DETAILS OF CHIEF EXECUTIVE OFFICER & INFORMATION OFFICER

The Act prescribes the appointment of an Information Officer for where such Information Officer is responsible to assess requests for access to information. The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of Section 17 of the Act as well as Section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render Bravo as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities.

All requests for information in terms of the Act must be addressed to the Information Officer or Deputy Information Officer:

	Information Officer	Deputy Information Officer
<b>Name</b>	Malcolm McDonald	Ahmed Patel
<b>Designation</b>	Chief Executive Officer	Group Internal Audit Manager
<b>Landline</b>	+27 11 661 1301	+27 11 661 1318
<b>Email</b>	malcolm@bravobrand.com	<a href="mailto:ahmedp@bravobrand.com">ahmedp@bravobrand.com</a>
<b>Postal Address</b>	PO Box 43563, Industria, 2042	
<b>Physical Address</b>	Cnr Main Reef Road & Avon Street, Longdale Ext. 2, Johannesburg, 2093	
<b>General Email</b>	popi@bravobrand.com	



## 5. GUIDE OF SA HUMAN RIGHTS COMMISSION

- 5.1. The South African Human Rights Commission has compiled the Guide as required in terms of Section 10 of the Act. The Guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act and accordingly it:
- 5.1.1. Contains information on understanding and how to use the Act;
- 5.1.2. Includes: The objectives of the Act, Particulates of every Public and Private Body; The manner and form for requests; Contents of the Regulations promulgated under the Act;
- 5.1.3. Will be updated and published every two years.
- 5.2. The Guide is available in all the official languages of the Republic of South Africa;

- 5.3. Any enquiries regarding the Guide should be directed to:

Postal Address:	Private Bag X2700, Houghton, 2041
Telephone Number:	+27-11-877 3803
Fax Number:	+27-11-403 0625
Website:	<a href="http://www.sahrc.org.za">www.sahrc.org.za</a>
Email:	<a href="mailto:Section51.paia@sahrc.org.za">Section51.paia@sahrc.org.za</a>

- 5.4. The Guide is available for inspection, at the offices of the Human Rights Commission at

29 Princess of Wales Terrace  
Cnr York and St. Andrews Street  
Parktown

**AND**

on its website at [www.sahrc.org.za](http://www.sahrc.org.za)



## 6. RECORDS AVAILABLE ONLY ON REQUEST TO ACCESS IN TERMS OF THE ACT (SECTION 51(1)(d))

Category	Records Held:
Company Secretarial and Legal	<ul style="list-style-type: none"> <li>- Legal records;</li> <li>- Statutory records not available at Companies and Intellectual Property Commission (CIPC).</li> <li>- Minutes, meeting information and company decisions;</li> <li>- Corporate strategic planning documentation;</li> <li>- Delegations of authority;</li> <li>- Declarations of interest;</li> <li>- Corporate governance records, including policies and procedures; and</li> <li>- Intellectual Property information;</li> </ul>
Risk Management	<ul style="list-style-type: none"> <li>- Insurances;</li> <li>- Physical security information; and</li> <li>- Operational risks policies.</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>- Information Technology policy and manual;</li> <li>- Equipment details;</li> <li>- Records of access functions; and</li> <li>- Usage statistics.</li> </ul>
Finance	<ul style="list-style-type: none"> <li>- Financial policy and manual;</li> <li>- Management accounts;</li> <li>- Financial records;</li> <li>- Group tax records;</li> <li>- Property valuations;</li> <li>- Bank account information;</li> <li>- Fixed asset registers;</li> <li>- Customer database, credit application forms including debtor supporting documentation; and</li> <li>- Supplier database, credit application forms including creditor supporting documentation.</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>- Human resources policies and manual;</li> <li>- Employee financial and tax information;</li> <li>- Employee personnel information;</li> <li>- Training and development information;</li> <li>- Employee benefit information; and</li> <li>- Recruitment and selection information.</li> </ul>
Manufacturing	<ul style="list-style-type: none"> <li>- Manufacturing policies and manual;</li> <li>- Records of function and related costing;</li> <li>- Delivery and collection sheets;</li> <li>- Inventory records; and</li> <li>- List of suppliers.</li> </ul>
Marketing	<ul style="list-style-type: none"> <li>- Marketing policy and manuals;</li> </ul>



- Marketing information;
- Field Records;
- Brochures; and Contact list for direct marketing.

## 7. RECORDS AVAILABLE WITHOUT REQUEST

Category	Records Held:
Marketing	<ul style="list-style-type: none"><li>- all information on our website: www.bravobrand.com</li><li>- all information on associated websites: www.alpinelounge.co.za www.destinyseating.com www.edblo.co.za www.gomma.co.za www.graftoneverest.co.za www.kingcoil.co.za www.la-z-boy.co.za www.milanodecor.co.za www.sealy.co.za www.slumberland.co.za</li><li>- Media releases; and</li><li>- marketing material produced for public consumption</li></ul>
Legislation	<ul style="list-style-type: none"><li>- Privacy Policies;</li><li>- Terms and Conditions; and</li><li>- PAIA Manual.</li></ul>

## 8. APPLICABLE LEGISLATION (Section 51(1)(c))

8.1. Where applicable to its operations, Bravo also retains records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreements or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties. A request to access must be done in accordance with the prescriptions of the Act.

- 8.1.1. Basic Conditions of Employment Act No. 75 of 1997;
- 8.1.2. Broad-Based Black Economic Empowerment Act No. 53 of 2003;
- 8.1.3. Companies Act No. 71 of 2008;
- 8.1.4. Compensation of Occupational Injuries and Diseases Act No. 130 of 1993;
- 8.1.5. Competition Act. No. 71 of 2008;
- 8.1.6. Constitution of the Republic of South Africa No. 108 of 1996;
- 8.1.7. Copyright Act No. 98 of 1978;
- 8.1.8. Customs and Exercise Act No. 91 of 1964;
- 8.1.9. Debt Collectors' Act No. 114 of 1998;
- 8.1.10. Designs Act No. 195 of 1993;
- 8.1.11. Electronic Communications Act No. 36 of 2005;
- 8.1.12. Electronic Communications and Transaction Act No. 25 of 2002;
- 8.1.13. Employment Equity Act No. 55 of 1998;
- 8.1.14. Financial Advisory and Intermediary Services Act No. 37 of 2002;



- 8.1.15. Financial Intelligence Centre Act No. 38 of 2001;
- 8.1.16. Identification Act No. 68 of 1997;
- 8.1.17. Income Tax Act No. 58 of 1962;
- 8.1.18. Insider Trading Act No. 135 of 1998;
- 8.1.19. Insolvency Act No. 24 of 1936;
- 8.1.20. Intellectual Property Laws Amendment Act 38 of 1997;
- 8.1.21. Labour Relations Act No. 66 of 1995;
- 8.1.22. Leases of Land Act No. 18 of 1969;
- 8.1.23. Long Term Insurance Act 52 of 1998;
- 8.1.24. Machinery and Occupational Safety Act No. 6 of 1983;
- 8.1.25. National Credit Act No. 34 of 2005;
- 8.1.26. National Road Traffic Act 93 of 1996;
- 8.1.27. Occupational Health and Safety Act No. 85 of 1993;
- 8.1.28. Patents Act No. 57 of 1978;
- 8.1.29. Pension Funds Act No. 24 of 1956;
- 8.1.30. Prescription Act No. 68 of 1969;
- 8.1.31. Prevention and Combating of Corrupt Activities Act No. 12 of 2004;
- 8.1.32. Prevention of Organized Crime Act No. 121 of 1998;
- 8.1.33. Promotion of Access to Information Act No. 2 of 2000;
- 8.1.34. Protection of Personal Information Act No. 4 of 2013;
- 8.1.35. Revenue Laws Second Amendment Act. No 61 of 2008;
- 8.1.36. Road Transportation Act. No. 74 of 1977
- 8.1.37. Short-term Insurance Act No. 53 of 1998;
- 8.1.38. Skills Development Act No. 97 of 1998
- 8.1.39. Skills Development Levies Act No. 9 of 1999;
- 8.1.40. Taxation Laws Amendment Act No. 7 of 2010;
- 8.1.41. Trademarks Act No. 194 of 1993;
- 8.1.42. Transfer Duty Act No 40 of 1949;
- 8.1.43. Uncertificated Securities Tax Act No. 31 of 1998;
- 8.1.44. Unemployment Contributions Act 63 of 2001;
- 8.1.45. Unemployment Insurance Act No. 30 of 1966;
- 8.1.46. Value Added Tax Act 89 of 1991.

**8.2.** It is further noted that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

## **9. REQUEST PROCEDURE**

- 9.1.** The requester must comply with all the procedural requirements contained in the Act relating to the request for access to information.
  - 9.1.1. The requester must complete the prescribed form included herewith and submit same with proof of payment of the request fee and/or a deposit fee (if applicable) to the Information Officer or the Deputy information Officer at the postal or physical addresses, fax number or electronic mail address as noted in clause 4 above.
  - 9.1.2. The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:
    - 9.1.2.1. the record or records requested; and
    - 9.1.2.2. the identity of the requester.
  - 9.1.3. The requester should indicate which form of access is required and specify a postal address or email address or the requester in the Republic of South Africa.
  - 9.1.4. The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state the nature of the right to be exercised or protected. The requester must clearly specify why the record is necessary to exercise or protect such a right (Section 53(2)(d)).



- 9.1.5 Bravo will process the request within 30 (thirty) days, unless the requester has stated special reasons, to the satisfaction of the Information Officer, which dictate that the time period not be complied with.
- 9.1.6 The requester shall be advised in writing whether access is granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, the requester will be obligated to state which manner and the particulate required.
- 9.1.7 If the request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Information Officer (Section 52(2)(f)).
- 9.1.8 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 9.1.9 The requester must pay the prescribe fee before any further processing can take place.
- 9.1.10 All information as listed in clause 9 herein should be provided and failing which, will result in a delay in the process. The prescribed time periods will not commence until the requester has furnished all the necessary and required information. The Information Officer shall serve a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclosed.

## **10. REFUSAL OF ACCESS TO RECORDS**

- 10.1.** In terms of the Act, Bravo is entitled to refuse a request for information.
- 10.2.** The main grounds for Bravo to refuse a request for information relates to the:
  - 10.2.1. mandatory protection of the privacy of a third party which is a natural person or a deceased person (Section 63) or a juristic person, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person.
  - 10.2.2. mandatory protection of personal information or disclosure of any personal information in terms of any other legislative, regulatory or contractual agreement.
  - 10.2.3. mandatory protection of the commercial information of a third party (Section 64), if the records contain:
    - 10.2.3.1. trade secrets of the third party;
    - 10.2.3.2. financial, commercial, scientific information which disclosure could likely cause harm to the financial or commercial interest of that third party; and/or
    - 10.2.3.3. information disclosed in confidentiality by third parties (Section 65) if it is protected in terms of any agreement.
  - 10.2.4. mandatory protection of records which would be regarded as privileged in legal proceedings (Section 67).
- 10.2.5. The Commercial activities (Section 68) of a Private Body, such as Bravo, which may include:
  - 10.2.5.1. trade secrets of Bravo.
  - 10.2.5.2. financial, commercial, scientific information, engineering information which disclosure could likely cause harm to the financial or commercial interest of Bravo.
  - 10.2.5.3. scientific and engineering information which is protected by copyright.
  - 10.2.5.4. information which, if disclosed, could put Bravo at a disadvantage in negotiations or commercial competition.
  - 10.2.5.5. a computer programme which is owed by Bravo, and which is protected by copyright.
  - 10.2.5.6. the research information (Section 69) of Bravo or a third party, if its disclosure would disclose the identity of Bravo, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- 10.3.** Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- 10.4.** All requests for information will be assessed on their own merits and in accordance with the applicable legislation.
- 10.5.** If a requester's records cannot be found or if the record/s do not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested information. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access



to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

## **11. REMEDIES AVAILABLE ON REFUSAL OF REQUEST FOR RECORDS**

### **11.1. Internal remedies**

Bravo does not have an internal appeal procedure. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requester is not satisfied with the answer supplied by the Information Officer.

### **11.2. External Remedies**

- 11.2.1. A requester that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.
- 11.2.2. A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

## **12. FEES**

### **12.1. The Act provides for two types of fees, namely:**

- 12.1.1. A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered. The request fee is not refundable; and
- 12.1.2. An access fee, which is paid by all requesters, if a request for access is granted. The fee is inclusive of costs involved by the Private Body in obtaining and preparing the record for delivery to the requester.

### **12.2. When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (Section 54(1)).**

### **12.3. When the request is granted by the Information Officer, and the preparation of the record requires more hours as prescribed (six) in the regulations, the Information Officer shall notify the requester to pay, as a deposit, the prescribed portion of the access fee which would be payable if the request is granted.**

### **12.4. The Information Officer can withhold a record until the requester has paid the fees as indicated below.**

### **12.5. A requester must pay the access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours (six) to search for and prepare the record for disclosure including making arrangements to make it available in the request form.**

### **12.6. If a deposit has been paid in respect of a request for access, which is refused, the Information Officer must repay the deposit to the requester.**

### **12.7. All fees are subject to change as allowed for in the Act and as a consequence such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any change in the fees prior to making a payment.**

### **12.8. Request fees**

Where a requester submits a request for access to information held by an institution on behalf of a person other than a requester himself/herself, a request fee in the amount of R50.00 is payable up-front before the institution will further process the request received.

### **12.9. Access Fees**

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment for an access fee is excluded in terms of the Act.

At the time of publication, the applicable access fees payable are:

<b>Access of Information Fees</b>	<b>Fees to be charged</b>
A photocopy on an A4 size page or part thereof	R1.10
A printed copy on an A4 page or part thereof	R0.75



A copy in computer-readable format, for example: compact disc or memory stick	R70.00
A transcription of visual images, on an A4 page or part thereof	R40.00
A copy of a visual image	R60.00
A transcription of an audio recording, on an A4 page	R20.00
A copy of an audio recording	R30.00
A search and preparation of the record for disclosure: *Per hour or part thereof, reasonably required for the search and preparation.	R30.00*
Where a copy of a record needs to be posted, the actual postal fee is payable.	

#### 12.10. Reproduction Fees

Where Bravo has voluntarily provided a list of categories of records that will automatically be made available to any person requesting access therefor, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

<b>Reproduction of Information Fees</b>	<b>Fees to be charged</b>
A photocopy on an A4 size page or part thereof	R1.10
A printed copy on an A4 page or part thereof	R0.75
A copy in computer-readable format, for example: compact disc or memory stick	R70.00
A transcription of visual images, on an A4 page or part thereof	R40.00
A copy of a visual image	R60.00
A transcription of an audio recording, on an A4 page	R20.00
A copy of an audio recording	R30.00
A search and preparation of the record for disclosure: *Per hour or part thereof, reasonably required for the search and preparation.	R30.00*
Where a copy of a record needs to be posted, the actual postal fee is payable.	

#### 12.11. Deposits

Where the institution receives a request for access to Information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record will take more than 6 (six) hours, a deposit is payable by the requester.

The amount payable is equal to 1/3 (one third) of the amount of the applicable access fee.

#### 12.12. Payment details

The initial "request fee" of R50.00 should be deposited into the requisite bank account and a copy of the deposit slip, application form and other documentation must be forwarded to the Information Officer via any of the communication channels listed in clause 4 of this PAIA Manual.

The bank account details will be supplied on request for information.



This PAIA Manual is approved and signed by the Information Officer, on this 22<sup>nd</sup> day of August 2023.

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**Malcolm McDonald**  
Chief Executive Officer  
Bravo Brands (Pty) Ltd