



**Ricoh Europe SCM Incorporated in Amsterdam**

**Registration number: 4860260290**  
(the “Company”)

**Access to Information Manual**

**Prepared in terms of section 51 of the Promotion of Access to Information Act,**  
**No.2 of 2000.**

(the “Act” or “PAIA”)

Updated on 31 December 2015

**RICOH EUROPE SCM**

**SECTION 51 MANUAL**

**PROMOTION OF ACCESS TO INFORMATION ACT, 2000**

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## 1. Introduction

1.1 Ricoh Europe SCM BV ("RESCM") is a Dutch company which is responsible for managing Ricoh's supply chain in the Europe, the Middle East and Africa ("EMEA") region. In this role it is responsible for purchasing Ricoh product from Ricoh manufacturers in the UK and Asia and then selling & transporting it to Ricoh Operating Companies ("OpCos") throughout EMEA and their customers.

1.2 RESCM is divided into two operating divisions:

(a) the European Distribution Centre ("EDC"), based at Bergen-op-Zoom in the Netherlands. The EDC is responsible for buying, selling and transporting Ricoh products leased or sold to customers; and

(b) the European Service Parts Centre ("ESPC"), based at Schiphol-Rijk in the Netherlands, which is responsible for buying, selling and transporting the parts used to service and maintain Ricoh products.

1.3 In addition to the main locations at Bergen-op-Zoom and Schiphol-Rijk RESCM holds stock at a number of warehouses in different countries. These warehouses are referred to as "**satellites**" by RESCM and our OpCos. The satellites are located in France, Germany, Italy, South Africa, Spain, Sweden, Turkey and the UK. The South African satellite office is based in 1 Bell Street, Growth Point Industrial Estate, Meadowdale, Johannesburg.

**2. Company contact details** (section 51(1)(a) of the Act)

2.1 All correspondence and requests must be addressed to the “Financial Director of Ricoh South Africa (Pty) Ltd”.

2.2 Postal address:

P O Box 2578  
Bedfordview  
2008

2.3 Street address:

Eastwood Office Park  
11B Riley Road  
Bedfordview Ext 328

2.4 Switchboard number:

011 723 5000

2.5 Facsimile number:

011 723 5100

2.6 Website:

[www.ricoh.co.za](http://www.ricoh.co.za)

2.7 Email address:

[elma.cilliers@ricoh.co.za](mailto:elma.cilliers@ricoh.co.za)

3. **The section 10 Guide on how to use the Act** (section 51(1)(b) of the Act)
- 3.1 The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 3.2 Requests in terms of the Act must be made in accordance with the prescribed procedures and at the rates provided.
- 3.3 Requesters are referred to the Guide in terms of section 10 of the Act, which has been compiled by the South African Human Rights Commission (**SAHRC**), which will contain information for the purposes of exercising constitutional rights. The Guide is available from the SAHRC.
- 3.4 The contact details of the SAHRC are:

Postal address:	Private Bag, 2700, Houghton, 2041
Telephone number:	+27 11 877 3600
Fax number:	+27 11 403 0625
Website:	<a href="http://www.sahrc.org.za">www.sahrc.org.za</a>
Email:	<a href="mailto:complaints@sahrc.org.za">complaints@sahrc.org.za</a>

#### 4. Access to the records of the Company

- 4.1 In terms of section 50 of the Act, a requester must be given access to any record of a private body if –
- (a) that record is required for the exercise or protection of any rights;
  - (b) that person complies with the procedural requirements of the Act relating to a request for access to that record; and
  - (c) access to such record is not refused in terms of any ground for refusal as contemplated in Chapter 4 (sections 62 to 70) of the Act.

When the requester is a public body requesting access to a record for the exercise or protection of any rights, other than its rights, then it must be acting in the public interest.

- 4.2 A requester must submit the request in the prescribed format - Form C, which is attached to Government Notice R187 dated 15 February 2002. The notice is available at the website [www.sahrc.org.za/paia\\_info.htm](http://www.sahrc.org.za/paia_info.htm) or under Regulations at [www.doj.gov.za](http://www.doj.gov.za).

4.2.1 The Company will within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

4.2.2 The 30 day period may be extended for a further period of not more than 30 days if the request is for a large amount of information, or the request requires a search for information held in storage and the information cannot reasonably be obtained within the first 30 day period. The Company will notify the requestor in writing should an extension be required.

- 4.3 A requester will be required to pay the applicable prescribed fee(s) as laid down in the Government Notice.

- 4.4 Requesters should contact the SAHRC for further information.

## 5. Applicable legislation

- 5.1 Arbitration Act, 1965;
- 5.2 Basic Conditions of Employment Act, 1997;
- 5.3 Close Corporations Act, 1984;
- 5.4 Companies Act, 2008;
- 5.5 Copyright Act, 1978;
- 5.6 Compensation for Occupational Injuries and Health Diseases Act, 1993;
- 5.7 Consumer Protection Act, 2008
- 5.8 Competition Act, 1998
- 5.9 Criminal Procedure Act, 1977
- 5.10 Employment Equity Act, 1998;
- 5.11 Electronic Communications and Transactions Act, 2002;
- 5.12 Financial Advisory and Intermediary Services Act, 2002;
- 5.13 Income Tax Act, 1962;
- 5.14 Labour Relations Act, 1995;
- 5.15 Occupational Health and Safety Act, 1993;
- 5.16 Pension Funds Act, 1956
- 5.17 Prevention and Combating of Corrupt Activities Act, 2004
- 5.18 Promotion of Access to Information Act, 2000;
- 5.19 Protected Disclosures Act, 2000
- 5.20 National Environmental Management: Waste Act, 2008
- 5.21 National Environmental Management Act, 1998
- 5.22 Unemployment Insurance Act 2001; and
- 5.23 Value Added Tax Act, 1991.

## 6. Schedule of records (section 51(1)(d) of the Act)

### 6.1 Classification key

<u>Classification</u> <u>No.</u>	<u>Access</u>	<u>Classification</u>
1	May be disclosed	Public Access Document
2	May not be disclosed	Requested for the purpose of criminal or civil proceedings, or requested after commencement of criminal or civil proceedings <b>[s7]</b>
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information that belongs to the requester of that information <b>[s61]</b>
5	May not be disclosed	Unreasonable disclosure of personal information of natural person <b>[s63(1)]</b>
6	May not be disclosed	Likely to harm the commercial or financial interests of third party <b>[s64(a)(b)]</b>
7	May not be disclosed	Likely to harm the Company or third party in contract or other negotiations <b>[s64(c)]</b>
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement <b>[s65]</b>
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property <b>[s66]</b>
10	May not be disclosed	Legally privileged document <b>[s67]</b>
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks <b>[s64(2); s68(2)]</b>
12	May not be disclosed	Commercial information of Private Body <b>[s68]</b>
13	May not be disclosed	Likely to prejudice research and development information of the Company or a third party <b>[s69]</b>
14	May not be refused	Disclosure in public interest <b>[s70]</b>



## 6.2 Company records classification

<u>Area</u>	<u>Subject</u>	<u>Classification No.</u>
Marketing / Communications	* Media Releases	1
	* Social Responsibility	1
	* Customer Database	12
	* Product Sales Records	12
	* Pricing Policy & Procedures	12
Human Resources	* Staff Records	4,5,9,10
	* Employment Contracts	4,5,10
	* Policies & procedures	4
Finance	* Financial Statements	12
	* Financial & Tax Records	12
	* Asset Register	12
	* Management Accounts	12
	* Banking Information	12
	* Insurance Information	12
Administration	* Invoicing & Financing Information	12
Legal / Company Secretarial	* Statutory Records	12
Environmental / Safety / Health	* Environmental Policy	1
	* Environmental Records	11,14
	* Health & Safety Records	1,4,5,8,11
	* Quality Control Records	1
Logistics	* Importation Information	12
	* Production / Inventory Information	12
T Q M	* Key Performance Information	12
Information Security Management System (ISMS)	* ISMS Policy	1
	* ISMS Management System	1
	* Statement of Applicability	1
	* ISMS Records	1,8,9,12

**7. Form of request (section 51(1)(e))**

7.1 To facilitate the processing of your request, kindly:

7.1.1 Use the prescribed Form C attached to this manual and available on the website of the South African Human Rights Commission at [www.sahrc.org.za](http://www.sahrc.org.za)

7.1.2 Address your request to the Financial Director of Ricoh South Africa (Pty) Ltd.

7.1.3 Provide sufficient details to enable the Company to identify:

7.1.3.1 the record(s) requested;

7.1.3.2 the requester (and if an agent is lodging the request, proof of capacity);

7.1.3.3 the form of access required;

7.1.3.4 the postal address or fax number of the requester in the Republic of South Africa;

7.1.3.5 if the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof; and

7.1.3.6 the right which the requester is seeking to exercise or protect within an explanation of the reason the record is required to exercise or protect that right.

**8. Prescribed fees (section 51(1)(f))**

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

- 8.1.1 a requester is required to pay the prescribed fee(s) (R50.00) before a request will be processed;
- 8.1.2 if the preparation of the record requested requires more than the prescribed hours (six (6)), a deposit will be paid (of not more than one third of the access fee which would be payable if the request were granted);
- 8.1.3 a requester may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 8.1.4 records may be withheld until the fees have been paid; and
- 8.1.5 the fee structure is available on the website of the SAHRC ([www.sahrc.org.za](http://www.sahrc.org.za))

**9. Other information as may be prescribed**

9.1 The Minister of Justice and Constitutional Development has not prescribed any regulations in this regard.

**10. Availability of the manual**

10.1 This manual is also available for inspection during office hours at the offices of the National Council for Persons with Physical Disabilities in South Africa free of charge. Copies are available from the SAHRC.

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Megan Thomas  
Financial Director  
Executive  
RICOH SOUTH AFRICA (PTY) LTD  
(Signed as c/o RESCM)