

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

For

SANLAM TRUST (PTY) LTD

(Prepared in terms of section 51 of the Promotion of Access to Information Act, No.2
of 2000, as amended)

1. INTRODUCTION

Sanlam has over the years evolved from a traditional insurer to a diversified financial services provider with both a local and international footprint. Sanlam Trust (Pty) Ltd, the fiduciary capability within Sanlam, is a solely owned subsidiary that attends to the drafting of wills and the administration of estates and trusts.

Sanlam Trust strives to be client centric and to treat its customers fairly, to understand the clients' needs and to provide innovative, tailored solutions to fulfil those needs. At Sanlam Trust we link our clients' successes to our own and will continue to be accountable for our actions with the aim of building long-term relationships that improve peoples' lives.

The Promotion of Access to Information Act, No 2 of 2000, as amended (the Act) was enacted on 3 February 2000 and gives effect to the constitutional right of access to information. The purpose of the Act, amongst others, is to give effect to the constitutional right of access to information held by Private Bodies for the exercise of or protection of rights and to establish the procedures to give effect to that right, as swiftly and inexpensively as reasonably possible.

Section 51 of the Act requires a private body to compile a manual (the Manual) which details the requisite procedural issues attached to a request for information, the prescribed rates, the requirements which such request must meet as well as the grounds for refusal or partial refusal of such request. Please refer to the sections below for more information.

For more information on the Sanlam Group and its structure, please visit www.sanlam.co.za.

2. PURPOSE OF THIS MANUAL

The purpose of this manual is to facilitate any request for information; a requester may have under the Act, required for the protection or exercise of any right. Such a request may however be subject to justifiable limitations.

Wherever reference is made to "entities" in this manual, it will refer to the private bodies listed in Annexure "A" for whom this manual is drafted. For ease of reference, the use of the word "Sanlam" herein shall include reference to the other entities to which this Manual applies.

3. CONTACT DETAILS FOR SANLAM TRUST (PTY) LTD

Requests for information to any of the entities listed in Annexure "A" must be directed to:

Chief Executive:	Sankie Morata
Sanlam Trust	2 Strand Street
	Bellville
	7530
Telephone	(021) 947 4824
Email	IOST@Sanlam.co.za

4. GUIDE OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

In terms of Section 10 of the Act, the South African Human Rights Commission (SAHRC) published a guide in all the official languages of the Republic of South Africa. The Guide contains information on how to make use of the Act and to access information held by Private Bodies which impacts on a person's rights. The guide can be obtained from the SAHRC or from their website. Their contact details are as follows:

Attention The South African Human Rights Commission

Postal Private Bag X2700

Address Houghton 2041

Telephone (011) 877 3893

Fax (011) 403 0625

Email paia@sahrc.org.za

Website www.sahrc.org.za

5. TYPES OF RECORDS HELD

5.1. Records made available in terms of applicable legislation

Records are held and made available in terms of the legislation listed in Annexure B as applicable to the entities listed herein

5.2. Records that is freely available

In terms of section 52(2) of the Act the Minister may from time to time publish a Notice in the Government Gazette describing those records which are freely available. As of date of this Manual, no such Notice has been published that applies to any entities listed herein

5.3. Other Records held

Products and Services subjects

Wills Drafting & Safe Custody	Beneficiary Fund Administration
Estate Administration	Trust Administration
Tax Administration	Trust Deed Drafting

Curatorships	Umbrella Trust Administration
All records kept in terms of legislation applicable to any of the above products or services and the Financial Services Industry in general	

Company Records subjects

Finance	Distribution
Actuarial	Marketing
Client care	Information technology
Product management	Human resources
All records kept in terms of the Company Laws of South Africa	

Subjects on whom records are held

Shareholders	Subsidiary companies
Policyholders	Advisers
Directors	Brokers
Employees	Clients
Officials	Banking institutions

Consultants	External companies / contractors
Investors	Third Parties
Auditors	Associate Companies

Which records are held in respect of the above-mentioned subjects?

Confidential	Scientific
Personal	Research
Commercial	Operational
Financial	Trade
Group/company incorporation	Business
Group/company financial	Internal group/company divisions
Group/company departments	Group/company structure
Strategy	Operational
Contractor	Policyholder
Medical	Shareholder
Subsidiary companies	External companies

Adviser	Broker
Consultant	Directors
Information technology	Employee
Client, Heirs and Beneficiary	Banking institutions
Product and services	Official/legal
Contracts	Policy documents
Rules of Funds	Board of Trustees decisions
Statutory required reports	Secured and Unsecured loans
Title Deeds	Trust Deeds & Letters of Authority
Original Wills	Letters of Executorship

6. GROUNDS FOR REFUSAL

In terms of the Act justifiable grounds exist for an entity to refuse or limit access to information. Grounds for refusal include, but are not only limited to these, are:

- Personal information relating to individuals;
- Certain types of commercial information;
- Information that is deemed confidential;
- Information that is deemed privileged;

7. FORM OF REQUEST AND PRESCRIBED FEES

7.1. In order to access any records the Requester must complete the prescribed form. The form can be accessed from www.sanlam.co.za or can be requested from the Chief Executive / Information Officer of Sanlam Trust (Pty) Ltd.

7.2. The form must be completed with as much detail as possible and forwarded to the Chief Executive / Information Officer at the details provided in number 3 above.

7.3. Once your form has been submitted the Chief Executive of Sanlam Trust (Pty) Ltd will advise the Requester if any fees will be payable. The fees payable (if any) can be accessed from www.sanlam.co.za.

Annexure A

	Legal Entity	Registration number
1	Sanlam Trust (Pty) Ltd	1918/001689/07
2	Sanlam Trust Beneficiary Fund	12/8/37900/2
3	Glacier Trust (Pty) Ltd	1922/002268/07
4	Sanlam Wealthsmiths (Pty) Ltd	1920/002023/07

Annexure B

Records are held in accordance with the following legislation

Administration of Estates Act (No. 66 of 1965)	Long-term Insurance Act (No. 52 of 1998)
Employment Equity Act (No. 55 of 1998)	Inspection of Financial Institutions Act (No. 80 of 1998)
Skills Development Levies Act (No. 9 of 1999)	National Credit Act (No. 35 of 2002)
Skills Development Act (No. 97 of 1998)	Pension Funds Act (No. 24 of 1956)
Labour Relations Act (No. 66 of 1995)	Financial Markets Act (No. 19 of 2012)
Employment Equity Act (No. 55 of 1998)	Financial Intelligence Centre Act (No. 38 of 2001)
Basic Conditions of Employment Act (No. 75 of 1997)	Financial Advisory and Intermediary Services Act (No. 37 of 2002)
Unemployment Insurance Act (No. 63 of 2001)	Collective Investment Schemes Act (No. 45 of 2002)
Compensation of Occupational Injuries and Diseases Act (No. 130 of 1993)	Trade Marks Act (No. 194 of 1993)
Occupational Health and Safety Act (No. 85 of 1993)	Participation Bonds Act (No. 55 of 1981)
Income Tax Act (No. 58 of 1962)	National Payment Systems Act (No. 78 of 1998)
Value Added Tax Act (No. 89 of 1991)	Financial Institutions Protection of Funds Act (No 28 of 2001)
Insolvency Act (No. 24 of 1936)	Regulation of interception of Communications and Provision of Communications-related Information Act (No. 70 of 2002)
Companies Act (No. 61 of 1973) Companies Act (No. 71 of 2008)	Protection of Personal Information Act (No.4 of 2013)
Competition Act (No. 89 of 1998)	Prevention of Organised Crime Act (No. 121of 1998)
Consumer Affairs (Unfair Business Practices Act) (No. 71 of 2008)	Trust Property Control Act (No. 57 of 1988)
Consumer Protection Act (No. 68 of 2008)	Prevention and Combating of Corrupt Activities Act (No. 12 of 2004)
Wills Act no.7 of 1953	Short-term Insurance Act 53 of 1998