

MANUAL
OF
ALLIED ELECTRONICS CORPORATION
LIMITED
("ALTRON")

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 Altron 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

Altron, together with its subsidiaries (which incorporates operating divisions), is a Group of Companies that operates in the telecommunications, information technology, multi media and power electronics fields. Altron holds the majority of shares in the following listed entities:

Allied Technologies Limited
Bytes Technology Group Limited.

In addition, Altron One (Proprietary) Limited (“Fintech”) and Power Technologies Limited (“Powertech”) are wholly owned subsidiaries of Altron.

This Manual will cover the records held by Altron, Fintech, Powertech and their respective operating subsidiaries and divisions, whereas the records of Altech and BTG, and their respective operating subsidiaries and divisions, will be dealt with in separate Manuals which will be prepared and published by Altech and BTG respectively.

Accordingly, the subsidiaries (which incorporate operating divisions) covered by this Manual are:

ALTRON	FINTECH	POWERTECH
Bilven (Pty) Ltd.	Altron One Finance Acceptances (Pty) Ltd	ABB Powertech Transformers (Pty) Ltd.
Altronex (Pty) Ltd.	Altron One Finance Solutions (Pty) Ltd	Aberdare Cables (Pty) Ltd
Technologies Acceptances Finance (Pty) Ltd.	Altron One Information Services (Pty) Ltd	Aberdare Cables International Holdings (Pty) Ltd.
Ventron Corporation (Pty) Ltd	Altron One Informatics (Pty) Ltd	Aberdare Fibre Cable Systems (Pty) Limited
Altron Finance (Pty) Ltd.	Altron One Investment Holdings (Pty) Ltd	Aberdare Fibre Optic Cables (Pty) Limited
Altron Leasing & Finance (Pty) Ltd.		Aberdare Metallic Profiles (Pty) Limited
Altron Management Services (Pty) Ltd		Alcon Marepha (Pty) Limited
Altron Properties (Pty) Ltd		Battech (Pty) Limited
Global Village Network Technology (Pty) Ltd.		Battery Technologies (Pty) Limited
Aeromaritime International Management Services (Pty) Ltd		Buzwebethu Investments (Pty) Limited
Altron Investment Holdings (Pty) Ltd.		DC Components (Pty) Limited

Altron One (Pty) Limited		Desta Power Matla (Pty) Ltd
Fintech (Pty) Ltd		Erf 234 Wadeville (Pty) Ltd
		Erf 2619 Korsten (Pty) Ltd
		Erf 2620 Korsten (Pty) Ltd
		Formbat (Pty) Limited
		Instrumentation and Control Technology (Pty) Ltd
		Ke-Matomo Technologies (Pty) Ltd
		Power Technologies International Holdings (Pty) Ltd.
		Powertech Calidus (Pty) Ltd
		Powertech Industries (Pty) Ltd
		Powertech Industrial Group (Pty) Ltd.
		Powertech Properties and Investments (Pty) Ltd.
		Reenergy Technologies (Pty) Ltd
		Richards Bay Cable Distributors (Pty) Ltd.
		Sabat Battery Company (Pty) Ltd.
		Southern Cross Investments (Pty) Ltd
		Strike Technologies (Pty) Limited
		Tridonic SA (Pty) Limited
		Whiteleys (Pty) Limited
		Consolidated Sewing Machine Company (Pty) Ltd
		Desta Power Matla Holdings (Pty) Limited
		Erf 22/23 of Muswelldale (Pty) Limited
		Lascon Properties (Pty) Ltd
		Powertech Batteries (Pty) Ltd.
		Powertech Batteries International Holdings (Pty) Ltd
		Powertech Holdings (Pty) Ltd.

		U-Lite Holdings (Pty) Ltd

For purposes of this Manual Altron, Fintech and Powertech will jointly be referred to as “the Group”.

SECTION I: CONTACT PERSON AND ADDRESS DETAILS OF ALTRON (as required by Section 51(1)(a))

The Chief Executive Officer (“CEO”) of Altron has duly authorised the contact person below to ensure that the Act is complied with:

Contact Person: Mr A G Johnston

Physical Address: Altron House
4 Sherborne Road
Parktown, 2193
Johannesburg

Postal Address: P O Box 981
Houghton
2041
SOUTH AFRICA

Telephone: (011) 645 3600
Fax: (011) 726 5778
e-mail address: ajohnston@altron.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 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 the South African Human Rights Commission offices at 29 Princess of Wales Terrace, Cnr York and St Andrews Street, Parktown, Johannesburg, Tel No (011) 484-8300.

The Human Rights Commission may be contacted directly at:

The South African Human Rights Commission
EAIA Unit
The Research and Documentation Department

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
 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 of the company

3. Corporate communications

Press releases
Staff magazine
Corporate video
Analyst presentations
Corporate mission statement
Memos from the Chairman

4. Human Resources

Employment Equity returns to the Dept of Labour
Work skills development plan submitted to Fasset
Standard Terms and Conditions of Employment applicable to all Staff

5. Intellectual property

List of Altron trademarks and registration numbers

6. Immovable property

Title deeds

7. Company investments

List of subsidiary companies, associates and joint ventures

8. Employee benefits

Altron Group Pension Fund
Altron Group Retirement Fund
Altron Medical Aid Scheme

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

The actuaries of the retirement funds are Alexander Forbes Limited.

9. Auditors

The company's auditors are KPMG, 1 Empire Crescent, Parktown.

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 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 Head of Altron whose name and address details appear in Section I hereof.

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

CATEGORIES AND RECORD SUBJECTS

ALTRON CORPORATE DIVISION:

Chief Executive's office

The Chief Executive's office records comprise the following main categories:

- Statutory Records
- Administration Records
- Research Records
- Sponsorship Records
- Internal Reports and Communications
- Financial Reports

Corporate Finance

The Corporate Finance department provides specialist financial services to the Group. Corporate Finance records comprise the following main categories:

- Technical Records
- Departmental Administration Records
- Technical Publications
- Quoted Company Records
- Internal Reports and Communications

Group Tax

Group Tax provides advice to the Group on all aspects of taxation. Group Tax records comprise the following main categories:

- Tax Records
- Corporate, Subject and Country Records
- Administrative Records
- Internal Reports and Communications

Internal Audit

Internal Audit's purpose is to provide the Corporate Offices and Operations held through Altron with independent assurance that risks are being appropriately managed across the Group. Internal Audit records comprise the following main categories:

- Risk Management Records
- General Correspondence
- Group Audit Practice Records
- General Administration Records
- Audit Reports and Supporting Working Papers

Accounting

The Accounting department maintains financial and management accounts for the Group and provides back-office activities that support Integrated Treasury and Cash Management. Corporate Account records comprise the following main categories:

- Accounting Records
- Investment Records
- General Correspondence
- Management Reports
- Treasury Dealing and Settlement Records
- Transactional Records
- VAT Records
- PAYE Records
- Tax Records
- Consolidation Records
- Internal Reports and Communications

Company Secretary

The Company Secretary provides company secretarial services to the Group. Company Secretary records comprise of the following main categories:

- Contracts and Agreements
- Property Records
- Intellectual Property Rights Records(Trademarks, Patents, Registered Designs and Copyright)
- General Correspondence
- Investment Records
- Share Registration Records
- Statutory Records
- Minute Books
- Internal Reports and Communications

Human Resource (HR) Department

The Human Resource Department's primary objective is to develop and implement a competitive human resource strategy that will support the Group. Human Resource records comprise the following main categories:

- General Correspondence
- Employee Records
- General HR Policies and Procedures
- Training Records
- Pension Records
- Employee benefit Records
- Labour Relations Records
- Statutory Records
- Employment Equity Records
- Contracts

Legal Department

The Legal department provides assistance with all corporate legal matters material to the Group. Legal department records comprise the following categories:

- Working Files
- General Correspondence
- Copies of Agreements
- Statutory Records
- Litigation Records
- Legal Records
- Internal Reports and Communications

Medical and Occupational Health Services

Medical provides general clinic services to Group employees. Medical records comprise the following main categories:

- Accounting Records
- Medical Records
- Contracts and Agreements
- General Correspondence
- Medical Policies
- Minutes of Meetings
- Medical Reference material
- Clinic Policies
- Employee Records
- Minutes of Meetings
- Medical Reference Material
- Clinic Policies
- Employee Records
- Minutes of Meetings

Information Technology Department (ITD)

ITD is responsible for developing, supporting and providing assurance on the implementation of IT policies, standards and best practice in the Group. ITD records comprise the following main categories:

- General Correspondence
- Contracts and Agreements
- Operational Records
- Maps and Diagrams
- Asset Records
- Policy 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 of 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	
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*	
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)	
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)	
<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>					<p>YES</p>	<p>NO</p>

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 or 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 _____ 200_

**SIGNATURE OF REQUESTER/PERSON
ON WHOSE BEHALF REQUEST IS MADE**
