

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) as amended

DATE OF REVISION: 23/05/2025

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1. INTRODUCTION

1.1 Purpose of the Manual

Section 51 of the PAIA requires a Private Body to compile an Access to Information Manual ("Manual") which sets out the procedure and requirements to be adhered to in seeking to obtain access to information held by that Private Body. The objective of the Act as amended by Section 110 of the Protection of Personal Information Act No 4 of 2013 (POPIA) is to give effect to the constitutional right of access to information outlined in Section 32 of the Constitution of the Republic of South Africa.

This PAIA Manual is useful for the public to -

- 1.1.1 Check the categories of records held by PepsiCo SA which are available without a person having to submit a formal PAIA request;
- 1.1.2 Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 1.1.3 Know the description of the records of the body which are available in a access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 1.1.4 Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.1.5 Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto:
- 1.1.6 Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.1.7 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.1.8 Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 1.1.9 Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

1.2 Contact Details for Access to Information

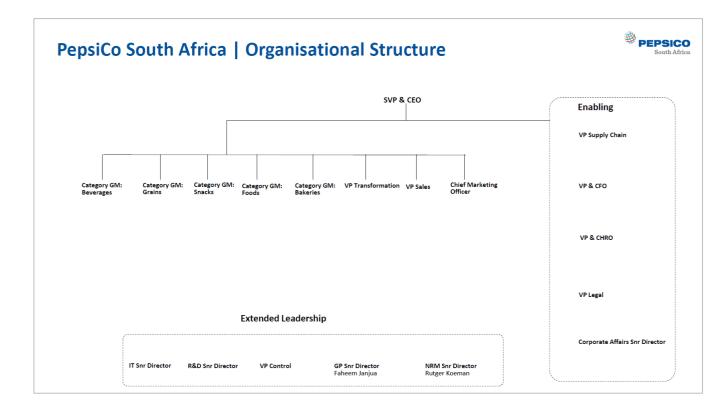
1.2.1	Information Officer			
	Name:	Riaan Heyl (Chief Executive Officer)		
	Tel:	+27 21 974 4000		
	Email:	ssaprivacyoffice@pepsico.com		
	Deputy Information	Officer designated in terms of section 17 (1) of PAIA Mmaseema Molepo (Data Privacy Officer)		
	Email:	ssaprivacyoffice@pepsico.com		
	Head Office			
	Physical Address:	PepsiCo South Africa Parc Du Cap Office Park Building 5 10 Willie van Schoor Avenue Bellville 7530		
	Postal Address:	PO Box 4091 Tyger Valley 7536		
	Telephone: Email: Website:	27 (0) 21 974 4000 ssaprivacyoffice@pepsico.com https://sa.pepsico.africa/		

1.2.2 Availability of the Manual

A copy of the Manual is available:

- On our website at https://sa.pepsico.africa/;
- To any person upon request and payment of a reasonable fee; and
- At the head office at the address outlined in paragraph 1.2.1.

2. THE STRUCTURE OF PEPSICO SOUTH AFRICA



3. A GUIDE ON HOW TO USE PAIA

- 3.1 The Regulator is responsible for and has developed a guide in each of the country's eleven languages and braille with information on how to use PAIA. This guide is available on the Information Regulator's website.
- 3.2 Any information or queries related to the guide should be directed to:

The Information Regulator (South Africa) PO Box 31522 Braamfontein Johannesburg 2017 Website: <u>www.inforegulator.org.za</u>

Email: <u>enqueries@inforegulator.org.za</u>

4. DEFINITIONS, ACRONYMS, ABBREVIATIONS AND INTEPRETATIONS

ACT	means the Promotion of Access to Information Act 2 of 2000 as amended from time to time, including all relevant regulations thereto
CEO	Chief Executive Officer
DIO	Deputy Information Officer
Head	Means the Chief Executive Officer of PepsiCo South Africa
IO	Information Officer
Manual	Means this manual together with all annexures hereto
PepsiCo	refers collectively to PepsiCo South Africa (Proprietary) Limited (formerly Simba) (Registration No. 1995/003667/07), Pioneer Foods (Pty) Ltd (Registration No. 1957/000634/07) and its Affiliates, and any reference to "We", "Us", or "Our" herein shall be a reference to PepsiCo South Africa
ΡΟΡΙΑ	Protection of Personal Information Act No.4 of 2013
Regulator	Information Regulator
Requester	Means the person making the request in terms of the Act
Republic	Republic of South Africa
SA	South Africa

5. CATEGORIES OF RECORDS HELD BY PEPSICO SOUTH AFRICA

5.1 Categories of records held in terms of (S14(1)(B)(Ii) Of PAIA) and access to records (S14(1)(B)(Iv) read with S15(1)(A) & (B) Of PAIA

Functions	Category of Records	Records Readily Available	Records Available Upon Request – Contact Details
Legal and Corporate Secretariat, and Corporate Affairs	 Company Records Organogram, Notice of incorporation Memorandum of Incorporation, Records relating to the appointment of directors and auditors, Public Officers, and other officers of the company Share and directors registers Documents made available to holders of securities Administrative records, and Executive Committees minutes and resolutions Supplier contracts Licenses Leases IT agreements IT licenses Legal opinions Advertising agreements Internal audit reports Acquisition/Divestiture/Merger/Reorganization agreements and related documents PepsiCo Foundation reports and records of contributions Records of charitable donations Civil court judgements Rehabilitation orders BBBEE certificate Company media and press releases Enterprise development beneficiary entities 	 Organogram (This is available on the PepsiCo SA website) Civil court judgements Company media and press releases BBBEE certificate 	ssaprivacyoffice@pepsico.com

Finance, Treasury and Tax Management	 Tax returns Accounting records Asset register Rental agreements Invoices PAYE records Documents issued to employees for income tax purposes Records of payments made to SARS on behalf of employees Banking records including banking details of employees, suppliers, and service providers Records of importation of goods including import tax, objections and appeals, and bill of entries 		
Human Resources	 Employment contracts, disciplinary records, policies and labour agreements Payroll records Leave records Employees medical records Employment equity plan (if applicable) Medical aid records Pension fund records Disciplinary records SETA records Disciplinary code Training records Training manuals 		
Compliance and Ethics	 Global Code of Conduct Records related to speak-up hotline Global Anti-Bribery Compliance Policy Speak-Up and Code of Conduct complaints, tip-offs and investigation reports 	Speak-up hotline number	
	 Quality assurance records Motor vehicle and other maintenance records Building permits Customs/Trade/NAFTA documentation Fleet and equipment purchase and sale/lease 		

Manufacturing, Operations and Logistics	 agreements Freight documentation Inventory management records including inventory receipts, usage, adjustments and valuation Records related to complaints, and accident claims 	
Marketing, Customer Relations, and Advertising	 Records related to competitions and campaigns, Product Complaints lodged by customers Records related to prizes and price winners Market research reports Terms and conditions of competitions 	 Terms and conditions of competitions
Supply Chain	 Supplier agreements including commodities contracts Terms and conditions for procurement of goods and services Tender and RFQ documents 	 Terms and conditions for procurement of goods and services
Research and Development	Product development records (e.g. project work plans, test protocols and results, research and technical reports, vendor, and ingredient assessments)	
Health, Safety, Environmental and Quality	 Records related to accident claims including vehicle and people claims Records related to assessments, air monitoring, and noise monitoring results Work permits Medical surveillance results 	

5.2 Description of Records that are available in accordance with any other legislation

Category of Records	Applicable Legislation
 Memorandum of incorporation Notice of incorporation Share registers and certificates Accounting records Annual Financial Statements Directors conflict of interests declarations Register of Company Secretary and Auditors Record of Directors Minutes and resolutions of directors' meetings, audit committee and directors' committees 	Companies Act 71 of 2008, as amended
PAIA ManualPAIA Annual Reports	Promotion of Access to Information Act 2 of 2000
 Employment contracts, Leave records Payroll records 	Basic Conditions of Employment Act 75 of 1997
 Records related to prizes and price winners Terms and conditions of competitions 	Consumer Protection Act 68 of 2008
 Civil court judgments Administration orders Credit applications Credit applications decisions Quotations Credit agreements 	National Credit Act 34 of 2005
 Records of risk assessments, medical surveillance records and exposure monitoring reports Compensation of Occupational Injuries and Disease Reports 	Compensation for Occupational Injuries and Diseases Act 130 of 1993
 Collective agreements and arbitration awards Disciplinary records 	Labour Relations Act 66 of 1995
 Record of processing activities (Personal information inventory) Privacy impact assessments 	Protection of Personal Information Act 4 of 2013
Learning and development records	Skills Development Act 97 of 1998

6. PROCESSING OF PERSONAL INFORMATION

6.1 Purpose of Processing Personal Information by Data Subjects by PepsiCo

PepsiCo processes personal information of data subjects based on -

- a) Consent obtained from data subjects. When data subjects provide their consent, they are informed about their rights and the procedures to exercise those rights, including the option to withdraw consent at any time.
- b) Legitimate interests of PepsiCo including direct marketing, security of property and network, fraud prevention, and product complains investigations.
- c) The performance of contract between PepsiCo and the data subject.
- d) Protecting data subject's legitimate interests.
- e) Compliance with an obligation imposed by law on PepsiCo including accounting and tax requirements.

6.2 Categories of Data Subjects and their Personal Information

Categories of Data Subjects	Personal Information that may be processed
Consumers	 Biographical data (for example, physical or postal address, email address, date of birth, age, identity number, first name, last name, and contact number, province/region, gender, language preference, number of children, household size, household income, marital status, education, occupation type) Financial data (for example, bank details) for payment of any agreed settlement amount or prize Data relating to your use of the Sites (for example, domain name, IP address and cookies) Shopping data (for example, brand preference, shop/retailer preference, consumption occasion, purchase trigger, purchase frequency, purchase reasons, preferred area type, prize preference, snacking times) Verification Information such as username, password, password reminder questions and password answers Any data you independently choose to provide to us (for example, if you send us an email or call us)
Suppliers, Contractors, Service Providers, and	 Identification data such as name of supplier, postal and physical address, company registration number, VAT number, BBBEE certificate or affidavit, directors' identity documents, background checks Financial data such as financial statements, banking confirmation details or letter
Clients (Retailers)	 Contact Information such Company name, contact persons, e-mail addresses, physical address, phone and mobile numbers. Account and payment information such as authorized account users, VAT and Income tax reference numbers, bank details, invoices and records, SWIFT and IBAN details. Identifiers such as Company registration numbers, identity numbers, Supplier/Vendor number, B-BBEE status, vehicle registration numbers, driver's license, physical addresses Contract information including product or services information, commercial terms of the contract, contract performance and non-performance. Financial information such as financial statements, credit and trade references, agreements, shareholders, trustees and sureties Background and credit information including credit status and depending on the nature of the services/contract, criminal record, and fraud checks.
Employees	 Name, surname, residential address, qualifications, CVs, gender, and race, proof of identity, background and reference checks, driver's license.

PepsiCo may share information or records with the following categories of recipients:

- a) PepsiCo Group of companies;
- b) Law enforcement agencies such as the South African Police Services, South African Revenue Services;
- c) Statutory oversight agencies and regulators such as the Information Regulator, Competition Tribunal;
- d) Verification and vetting agencies;
- e) Contractors of PepsiCo;
- f) Partners and agents;
- g) Third parties that we use to provide you with market
- h) ing and advertisements; and
- i) Any third party and/or supplier with whom PepsiCo conducts its business.

6.4 Planned Cross-Border Flows of Personal Information

- 6.4.1 PepsiCo South Africa is part of a global company; in the operation of our business, we use centralized functions and systems across the PepsiCo Group. Personal information may be processed through these centralized functions and systems. Examples of PepsiCo regions (sectors) PepsiCo South Africa may transfer personal information includes North America, Latin America, Europe, AMESA Sector (Africa, Middle East, and South Asia) and APAC Sector (Asia Pacific, Australia, New Zealand, and China).
- 6.4.2 The transfer of personal information outside South Africa will be in accordance with the requirements for lawful transfer outside of South Africa as set out in POPIA.

6.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- 6.5.1 PepsiCo secure the integrity and confidentiality of personal information in our possession or under our control by taking appropriate, reasonable technical and organizational measures to prevent loss of damage to or unauthorized destruction of Personal Information; and unlawful access to or processing of personal information.
- 6.5.2 To ensure such security, PepsiCo has in place policies, controls, and related processes, which are reviewed and updated on a regular basis.
- 6.5.3 Personal information security incident reporting and remediation.
- 6.5.4 By way of written agreements, imposition of security and confidentiality obligations on Operators and reserving the right to audit their systems to ensure compliance with such obligations.
- 6.5.5 Our policies, controls and procedures cover for example -
 - 6.5.5.1 Physical, technical and network security;
 - 6.5.5.2 Access controls and monitoring access; and
 - 6.5.5.3 Secure storage, destruction, and encryption of information and records.

7. PROCEDURE FOR PAIA REQUESTS

- 7.1 A request for access to a record and information that is not readily available should be lodged with the Deputy Information Officer using the physical address, postal address, or email address set out in paragraph 1.2. The Requester must complete a prescribed form (attached in the manual as Annexure A).
- 7.2 The form must be completed in a manner that provides sufficient details to enable the Deputy Information Officer to identify the information requested and to identify the person requesting such information. The form must also indicate which form of access is required to the information as well as specify a postal address or email address of the Requester. The form must also identify the right that the Requester is seeking to exercise or protect and provide an explanation of why the requested information is required for the exercise or protection of that right.
- 7.3 To verify the Requester's identity, they must provide adequate proof of identity. This can include a certified copy of their ID, driver's license, or passport.
- 7.4 If the request is made on behalf of another person, the requester must submit proof, in the form of an affidavit or letter of consent of the capacity in which the requester.
- 7.5 Once the completed form is received, the Deputy Information Officer will acknowledge receipt to the requester. If the request is granter, the Requester may be required to pay a specified request fee using the banking details provided, if applicable.
- 7.6 Upon receiving proof of payment, the requested information and records will be compiled and provided to the requester within 30 calendar days.
- 7.7 Where records cannot be located but to which a Requester would have had access if the record was available, PepsiCo will provide a response in the form of an affidavit or affirmation. This also applies where the requested records do not exist.

8. REQUEST FOR ACCESS TO INFORMATION ABOUT THIRD PARTIES

- 8.1 If a request access to a record contains information about a third party, PepsiCo is obliged to attempt to contact the third party to inform them of the request and to give them an opportunity to respond by either consenting to the access or by providing reasons why the access should be denied.
- 8.2 If the third party furnishes reasons for the denial of access, the Deputy Information Officer will consider these reasons in determining whether access should be granted.
- 8.3 The Requester may appeal against a refusal of access by the Designated Corporate Information Officer. Please refer to Sections 74, 77 and 78 of the Act for further details on the Appeal Process.

9. PRESCRIBED FEES

- 9.1 Section 54 of PAIA entitles a Private Body to levy a prescribed fee to a Requester before further Processing the request.
- 9.2 The request fee is aligned to the Regulations published in terms of the Act for Private Bodies.
- 9.3 The Requester will be notified of the amount required to be paid as the request fee.
- 9.4 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.

10. LODGEMENT OF COMPLAINTS

- 10.1 A request may lodge a complaint to the Information Regulator within 180 days of being advised of the Information Officer's decision.
- 10.2 A requester may lodge a complaint to the Information Regulator in respect of the following decisions of the Information Officer based on the amount of fees required to be paid and/or the extension of the period within which the information will be provided.

11. UPDATING OF THE MANUAL

The Designated Information Officer of PepsiCo South Africa will on a regular basis update this manual.

12. DISCLAIMER

- 12.1 The Manual does not allege to be exhaustive of or to comprehensively deal with every procedure provided for in the Act.
- 12.2 A requester is advised to familiarize him/her/itself with the provisions of the Act, before lodging any request with PepsiCo South Africa.

ANNEXURE A: REQUEST FOR ACCESS TO A RECORD OF PEPSICO SOUTH AFRICA

12.2.1 PARTICULARS OF PEPSICO SOUTH AFRICA

The Designate Information Officer: Mmaseema Molepo Email: <u>ssaprivacyoffice@pepsico.com</u> Parc Du Cap Office Park Building 5 10 Willie van Schoor Avenue Bellville 7530

12.2.2 PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD

Full names and surname: Identity number: Postal address: Telephone number: E-mail address:

Capacity in which request is made, i.e. when made on behalf of another person:

(a) The particulars of the person who requests access to the record must be given below.

(b) The address and/or fax number in the Republic to which the information is to be sent, must be given.

(c) Proof of the capacity in which the request is made, if applicable, must be attached.

12.2.3 PARTICULARS OF THE PERSON ON WHOSE BEHALF A REQUEST IS MADE

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

Full names and surname: Identity number: Postal address: Telephone number (work):

Mobile number:

E-mail address:

Capacity in which request is made:

12.2.4 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 (the Requestor), 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 in full.

12.2.4.1 Description of the record or relevant part of the record

2.2.4.2 Reference number; if available:

12.2.4.3 Any further particulars of record:

12.2.5 FEES

(a) A request for access to a record, other than a record containing personal information about yourself (the Requestor), 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 an exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

12.2.6 FORM OF ACCESS TO 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 O 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:					
	A copy of record	An inspection of record			
2. IF THE RECO	RD CONSISTS OF VISUAL IMAGE	S			
This includes pho	otographs, slides, video recordings, c	computer-generated images, sk	etches, 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 RECO	RD IS HELD ON A COMPUTER OR	IN AN ELECTRONIC OR MAC	HINE-READABLE FORM:		
	printed copy of record	printed copy of information derived from the record	copy in computer readable form (compact disc, memory card)		
If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?			NO		
Note: If "YES", postage is payable.					

12.2.7 PARTICULARS OF THE RIGHT TO BE EXERCISED OR PROTECTED

- (a) 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.
- (b) Indicate which right is to be exercised or protected:
- (c) Explain why the record requested is required, for the exercise or protection of the aforementioned right:

12.2.8 NOTICE OF THE DECISION REGARDING THE REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved or 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? Kindly advise.

Signed at......day of20......

ANNEXURE B: LIST OF READILY AVAILABLE INFORMATION OF PEPSICO SOUTH AFRICA (PTY) LTD

This notice is in terms of section 15(1) of the Promotion of Access to Information Act, 2000 (PAIA) of records that are automatically available without a person having to request access in terms of PAIA.

The Notice is distinguished according to the various divisions within PepsiCo South Africa, outlining their respective functions, and the records within that division that are automatically available. Access to such records may be requested by sending a request to the email address provided in the Notice.

Functions	Readily Available Information	Contact Details
Legal and Corporate	 Organogram (This is available on the PepsiCo SA website) 	
Secretariat, and Corporate	Civil court judgements	ssaprivacyoffice@pepsico.com
Anans	 Company media and press releases 	
	BBBEE certificate	
Compliance and Ethics	Speak-up hotline number	
Marketing, Customer Relations, and Advertising	Terms and conditions of competitions	
Supply Chain	 Terms and conditions for procurement of goods and services 	