



## **PAIA POLICY**

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

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An authorised financial services provider (41963) Directors: CL. Banducci, AJ Gray

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## INTRODUCTION

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1. Cratos Capital Pty Ltd (The "FSP" or "CRATOS" hereafter) is a private company registered in the Republic of South Africa under registration number 2009/003446/07. CRATOS is a registered Financial Services Provider (FSP no. 41963)
2. Cratos is an authorized financial services provider who provides mainly non-discretionary trading services for equities and contracts for difference products. Cratos provides the infrastructure and research and trading systems to this type of client. Cratos uses Peresec Pty Ltd (JSE member) to execute the trades and systems for record keeping and trade reporting. Cratos also provides fully discretionary portfolio services to a small number of clients.
3. As a Financial Services Provider authorized by the Financial Sector Conduct Authority ("FSCA"), CRATOS offers financial services including Category I and II financial products not limited to but including investment products and options in South Africa.
4. CRATOS's head office is located at 10<sup>th</sup> Floor 1004 Illovo Point, 68 Melville Rd, Illovo, Sandton, Johannesburg, 2196. The current directors and owners are Clinton Banducci and Andrew Gray, and they are Key Individuals.
5. This guide sets out the process to be followed should one wish to exercise their rights in terms of PAIA or POPIA

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## RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

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6. The following legislation is applicable to us:
7. The Financial Services Board Act No. 97 of 1990 – categorized as a financial institution in terms hereof.
8. The Financial Advisory and Intermediary Services Act No. 37 of 2002 (FAIS) – categorized as a financial services provider in terms hereof and to be licensed as such in due course.
9. The Financial Sector Regulation Act 9 of 2017
10. Financial Intelligence Centre Act 38 of 2001
11. The Securities Services Act 36 of 2004

## OTHER

- Companies Act No 71 of 2008
- Income Tax Act, No 58 of 1962
- Prevention of Organised Crime Act, No 121 of 1998;
- Promotion of Access to Information Act, No 2 of 2000;
- Protection of Personal Information Act, No. 4 of 2013;
- Unemployment Insurance Act, No 30 of 1996
- Value Added Tax Act, No 89 of 1991

Whilst care was taken to provide a comprehensive list of applicable legislation, this list may be incomplete.

- 13.4. Staff Salaries and Benefits
- 14. Operations
  - 14.1. Business Conducted by the Organisation
  - 14.2. Mandates concluded with clients
  - 14.3. Financial products sold to clients
- 15. Client Particulars
  - 15.1. Personal Particulars of Clients
  - 15.2. Account Records of Clients
  - 15.3. Mandate Details
  - 15.4. Deposit and withdrawal details
  - 15.5. Clients instructions and correspondence
  - 15.6. Cessions and Beneficiary Details if applicable
  - 15.7. Income Tax Particulars of Clients
- 16. Finances
  - 16.1 Fixed Asset Registry
  - 16.2. Movable Asset Registry
  - 16.3. Commission Statements (Consolidated and per Partner)
  - 16.4. Financial Statements

*\*In terms of section 50(1) of PAIA a requester must be given access to any record of a private body, if that record is required for the exercise or protection of any rights.*

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#### THE PROCEDURE FOR REQUESTING OUR RECORDS

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17. The requester must use the prescribed form to make the request for access to a record.

- **Form 02:** Request for Access to Record [Regulation 7]- Public & Private Bodies.
- **Form 03:** Outcome of request and of fees payable [Regulation 8]- Public & Private Bodies.

These forms are also available from the Chief Information Officer named in Section 3 above. Alternatively, they are available from the website of the Information Regulator at <https://info regulator.org.za/popia-forms/>

See Annexure B: Form C to this document. This must be made to the Head of our organisation. The request must be made to our postal address or e-mail address below.

- 18. The requester must provide sufficient detail on the request form to enable the Head to identify the record and the requester. The requester must also indicate which form of access is required and specify its postal address or email address.
- 19. The requester must identify the right that is sought to be exercised or to be protected and provide an explanation as to why the requested record is required for the exercise of that right.
- 20. If the request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Head of CRATOS.

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## FEES PAYABLE FOR REQUESTING OUR RECORDS

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22. A requester who seeks access to a record containing personal information about that requester is not required to pay the **request fee**. Every other requester, who is not a personal requester, must pay the required request fee:
- 22.1. The Head of CRATOS must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request.
- 22.2. The requester must pay a fee outlined in Annexure A. The requester may lodge an application to court against the tender or payment of the request fee.
- 22.3. After the Head of CRATOS has made a decision on the request, the requester will be notified in the required form.
- 22.4. If the request is granted, a further **access fee** must be paid for the search, reproduction, and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

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## DECISION

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- 23 **CRATOS** will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give written notice with reasons to that effect.
- 24 The 30 (thirty) day period within which **Cratos** must decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large amount of information, or the request requires a search for information held at another location and the information cannot reasonably be obtained within the original 30 (thirty) day period.
- 25 CRATOS will notify the requester should an extension be sought.

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## REMEDIES FOR REFUSAL OF A REQUEST

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### 26 Internal Remedies

CRATOS does not have internal appeal procedures as the decision made by the Information Officer is final.

A requester will need to exercise external remedies should the request for information be refused, and they are not satisfied with the decision by the Information Officer.

### 27 External Remedies

A requestor and/or third party that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of receipt of notification of the decision apply to the High Court with jurisdiction, for relief.

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## AVAILABILITY AND UPDATING OUR MANUAL

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- 28 This Manual can be viewed on our website or is available for inspection free of charge at the physical address below. The head of CRATOS will update the manual at such intervals as it deems necessary.

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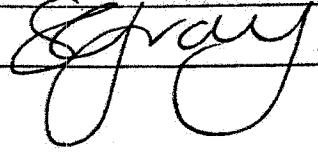
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## OUR CONTACT DETAILS

- Street Address: 10<sup>th</sup> Floor 1004 Illovo Point, 68 Melville Rd, Illovo, Sandton, Johannesburg, 2196
- Postal Address: PO Box 652776, Benmore, 2010
- Telephone Number: +27 (0)11 778 1160
- Facsimile Numbers: +27 (0)11 447 9530
- Electronic Mail (e-mail): [info@Cratos.co.za](mailto:info@Cratos.co.za)
- Website: [www.Cratos.co.za](http://www.Cratos.co.za)
- Head of organisation/CEO: Clinton Banducci

## AUTHORITY AND MANDATE

The PAIA policy is approved by way of approved resolution of the CRATOS Board. The directors are responsible for the adherence to and implementation of this plan throughout the organization.

REVIEW DATE	WHOM	SIGNATURE
18/09/2025	Susan Gray	

Sign off



Name: Clinton Banducci  
Date: 19 September 2025  
Position: CEO

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## ANNEXURE A - FEES IN RESPECT OF PRIVATE BODIES

FEE TYPE	DESCRIPTION	FEE
<b>Request Fee</b>	Fees for requesting records	R50
<b>Access Fee</b>	Information in an A4 size page photocopy or part thereof	R1.10
	A printed copy of an A4-size page or part thereof	R0.75
	A copy in computer-readable format, for example: Compact disc	R70
	A transcription of visual images, in an A4-size page or part thereof	R40
	A copy of visual images	R60
	A transcription of an audio record for an A4-size page or part thereof	R20
	A copy of an audio record	R30
	Search and preparation of the record for disclosure. Excluding the first hour reasonable required for the search and preparation	R30 per hour
	Postage Fee	Actual fee incurred

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**FORM 2**

**REQUEST FOR ACCESS TO RECORD**

[Regulation 7]

**NOTE:**

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer


(Address)

E-mail address:

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Fax number:

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Mark with an "X"

☐ Request is made in my own name

☐ Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:

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PERSONAL INFORMATION			
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			

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PERSONAL INFORMATION	

TYPE OF RECORD (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	

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Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

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Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of Requester / person on whose behalf request is made

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**FOR OFFICIAL USE**

<b>Reference number:</b>	
<b>Request received by:</b> (State Rank, Name and Surname of Information Officer)	
<b>Date received:</b>	
<b>Access fees:</b>	
<b>Deposit (if any):</b>	

\_\_\_\_\_  
Signature of Information Officer

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