



**CRATOS ASSET
MANAGEMENT**
INNOVATIVE WEALTH CREATION

PAIA POLICY

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INTRODUCTION

1. Cratos Asset Management Pty Ltd (The “FSP” or “CAM” hereafter) is a private company registered in the Republic of South Africa under registration number 2014/201224/07. CAM is a registered Financial Services Provider (FSP no. 46597) and SARB-registered institutional investor, offering bespoke investment solutions, across a broad array of asset classes, to its private client and institutional client base.
2. As a Financial Services Provider authorized by the Financial Sector Conduct Authority (“FSCA”), CAM offers financial services including Category I and II financial products not limited to but including investment products and options in South Africa and across global exchanges.
3. CAM’s head office is located at 57 Smits Road, Dunkeld, Johannesburg. The current board members are Gary Cahn, Dave Smyth and Desmond Esakov and Clinton Banducci is Key Individual alongside Dave Smyth. The rest of the team is comprised of portfolio managers, brokers, administrators and support staff.
4. This guide sets out the process to be followed should one wish to exercise their rights in terms of PAIA or POPIA

RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

5. The following legislation is applicable to us:
6. The Financial Services Board Act No. 97 of 1990 – categorized as a financial institution in terms hereof.
7. The Long Term Insurance Act No. 52 of 1998 – registered as an Intermediary in terms hereof.
8. The Collective Schemes Control Act No. 45 of 2002 - registered as a “manager” in terms hereof.
9. 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.
10. The Financial Sector Regulation Act 9 of 2017

RECORDS THAT MAY BE REQUESTED

11. Administration
 - 11.1 Licences (in terms of FAIS Act)
12. Human Resources
 - 12.1 Employment Contracts
 - 12.2 Remuneration Records and Policies
 - 12.3 Records of Disciplinary Hearings
 - 12.4 Staff Salaries and Benefits
13. Operations
 - 13.1 Business Conducted by the Organisation
 - Mandates concluded with clients
 - Financial products sold to clients
 - 13.2 Income Tax Submissions made to SARS for Clients
14. Client Particulars
 - 14.1 Personal Particulars of Clients
 - 14.2 Account Records of Clients
 - Mandate Details
 - Deposit and withdrawal details
 - Clients instructions and correspondence

- Cessions and Beneficiary Details if applicable
- Income Tax Particulars of Clients

15. Finances

15.1 Fixed Asset Registry

15.2 Movable Asset Registry

15.3 Commission Statements (Consolidated and per Partner)

15.4 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.*

THE PROCEDURE FOR REQUESTING OUR RECORDS

- The requester must use the prescribed form to make the request for access to a record (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.
- 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.
- 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.
- 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 CAM.

FEES PAYABLE FOR REQUESTING OUR RECORDS

16. 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:
- The Head of CAM 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.
 - 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.
 - After the Head of CAM has made a decision on the request, the requester will be notified in the required form.
 - 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.

AVAILABILITY AND UPDATING OUR MANUAL

17. This Manual can be viewed on our website or is available for inspection free of charge at the physical address below. The head of CAM will update the manual on a regular basis.

OUR CONTACT DETAILS

Street Address: 57 Smits Road, Dunkeld, Johannesburg, 2196
Telephone Number: +27 (0)11 778 1160
Facsimile Numbers: +27 (0)11 447 9530
Electronic Mail (e-mail): invest@cratos.co.za

CRATOS ASSET MANAGEMENT (PTY) LTD

Website: www.cratosam.co.za
Head of organisation/CEO: David Smyth

AUTHORITY AND MANDATE

18. The PAIA policy is approved by way of approved resolution of the CAM Board. The EXCO is responsible for the adherence to and implementation of this plan throughout the organization.

Sign off



Name: David Smyth

Date: 16 February 2023

Position: CEO

ANNEXURE A - FEES IN RESPECT OF PRIVATE BODIES

ITEM	DESCRIPTION	AMOUNT
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on:	
	(i) Flash drive (to be provided by requestor)	R40.00
	(ii) Compact disc	
	If provided by requestor	R40.00
	If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page Service to be outsourced. Will depend on quotation from Service provider.	
6.	Copy of visual images - Service to be outsourced. Will depend on quotation from Service provider.	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	(i) Flash drive (to be provided by requestor)	R40.00
	(ii) Compact disc	R40.00
	If provided by requestor	R60.00
	If provided to the requestor	
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
	To not exceed a total cost of	R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any

ANNEXURE B – FORM C

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 11]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

- | |
|--|
| <p>a) The particulars of the person who requests access to the record must be reported below.</p> <p>b) <i>Furnish an address and/or fax number in the Republic to which information must be sent.</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: _____