

21 December 2022

TO: ANIMAL LAW REFORM SOUTH AFRICA

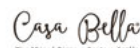
ATTN: [REDACTED]
[REDACTED]

Dear Sir

RE: CORPORATE ACCOUNTABILITY PROJECT - REQUEST FOR ACCESS TO INFORMATION

1. We refer to the Request For Access To Information, dated 17 November 2022, from Animal Law Reform South Africa ("**Requester**") under the Promotion of Access to Information Act, 2000 ("**PAIA**") to Spur Corporation Limited ("**the Request**").
2. We wish to inform you that Spur Corporation Limited is a holding company under which various subsidiaries operate, and is not in itself an operating company. Please refer to the diagram of our Group Structure attached hereto as Annexure A.
3. Accordingly, this letter serves as notice to the Requester of Spur Corporation Limited's refusal to provide the requested records to the Requester, on the basis that the Request has not been addressed to the correct legal entity, and therefore fails to meet the mandatory, stipulated procedural requirements in section 53 of PAIA.
4. Should the Requester require information regarding our Group's ESG strategy, please refer to our Integrated Annual Report, available at https://www.spurcorporation.com/wp-content/uploads/2022/11/Spur_Annual_IR_2022.pdf.
5. The Requester has the right to lodge a written complaint on Form 5 published under regulation 10 of the PAIA Regulations, to the Information Regulator against the refusal of the request by Spur Corporation Limited within 180 days of this refusal, alleging why Spur Corporation Limited's decision to refuse access to the record was not in compliance with PAIA.
6. Alternatively, the Requester may, by way of an application, within 180 days of the date of this letter, apply to a competent court for appropriate relief in terms of section 82 of PAIA.
7. All of Spur Corporation Limited's rights remain strictly reserved.

OUR BRAND FAMILY



Annexure A – Group Structure of Spur Corporation Limited

