

ACCESS TO INFORMATION MANUAL OF DR REDDY'S LABORATORIES (PTY) LTD

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

April 2024

TABLE OF CONTENTS

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer;
1.2	“Dr Reddy’s”	Dr Reddy’s Laboratories (Pty) Ltd;
1.3	“IO”	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as amended)
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“South Africa”	Republic of South Africa.

2. PURPOSE OF PAIA MANUAL

This Manual is useful for the public to-

- 2.1 check the categories of records held by Dr Reddy’s which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of Dr Reddy’s, by providing a description of the subjects on which Dr Reddy’s holds records and the categories of records held on each subject;
- 2.3 know the description of the records of Dr Reddy’s which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

- 2.6 know if Dr Reddy's 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if Dr Reddy's has planned to transfer or process personal information outside South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether Dr Reddy's has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. ABOUT DR REDDY'S

Dr. Reddy's has a diverse portfolio of treatment solutions in various therapy areas, including gastrointestinal, allergy, respiratory, antifungals, antibacterials, central nervous system and, oncology.

Dr Reddy's has an aspiration to create better patient journeys and our team is dedicated to create patient-centric solutions that address unmet medical needs of people in South Africa.

We are committed to providing access to affordable and innovative medicines, driven by our purpose of 'Good Health Can't Wait'.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF DR REDDY'S LABORATORIES (PTY) LTD

4.1. Country Manager

Name: Dr Rashem Mothilall
Email: rashemmothilal@drreddys.com

4.2. **Information Officer**

Name: Shivani Singh
Email: shivani.singh@drreddys.com

4.3 **General contact**

Head Office - Sandton

Dr Reddys Laboratories (Pty) Ltd

Block B

204 Rivonia Road

Morningside

Sandton

2196

Phone: +011 324 2100

For general enquiries: sa-webresponse@drreddys.com

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

5.2. The Guide is available in each of the official languages and in braille.

5.3. The aforesaid Guide contains the description of-

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

5.3.2.1. the Information Officer of every public body, and

- 5.3.3. the manner and form of a request for-
 - 5.3.3.1. access to a record of a public body contemplated in section 11¹; and
 - 5.3.3.2. access to a record of a private body contemplated in section 50²;
- 5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 5.3.6.1. an internal appeal;
 - 5.3.6.2. a complaint to the Regulator; and
 - 5.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 5.3.7. the provisions of sections 14³ and 51⁴ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

² Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

³ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁴ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

- 5.3.8. the provisions of sections 15⁵ and 52⁶ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 5.3.9. the notices issued in terms of sections 22⁷ and 54⁸ regarding fees to be paid in relation to requests for access; and
 - 5.3.10. the regulations made in terms of section 92⁹.
- 5.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.5. The Guide and relevant forms can also be obtained-
- 5.5.1. upon request to the Information Officer;
 - 5.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 5.6 A copy of the Guide will be made available in the following two official languages, for public inspection during normal office hours-
- 5.6.1 Afrikaans and isiZulu.

⁵ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁶ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁷ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

⁸ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

⁹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

6. CATEGORIES OF RECORDS OF DR. REDDY’S, WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record
Product Information	Publicly available documents or information on Dr Reddy’s products
Public facing policies and notices	Privacy Policy, Cookie Policy, Terms of use, PAIA Manual

7. REQUEST FOR ACCESS

7.1 A request for access must be initiated by completion and submission of the Request for Access to Record Form, attached as Annexure “2”. Note that the completion and submission of the Request for Access to Record form does not automatically permit access to the requested record. Requests for access to a record are subject to limitations if the requested record falls within a certain category as specified within Chapter 4 of PAIA. In the event that there is reasonable suspicion that a requester has obtained access to records fraudulently, (either through the submission of materially false or misleading information or otherwise), legal proceedings may be instituted against such requester.

7.2 The completed Request for Access to Record Form together with any required supporting documents must be addressed to the contact person as indicated above. The relevant request fee shall be payable on submission of the request. The attached Annexure 3 sets out the form of the outcome of request and the fees payable.

8. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS (CHAPTER 4)

The main grounds for refusal of a request for information in terms of Chapter 4 of PAIA, are per the headings below:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of the commercial information of a third party;
- Mandatory protection of certain confidential information of a third party in terms of an agreement;
- Mandatory protection of the safety of individuals and the protection of property;

- Mandatory protection of records which are privileged in legal proceedings;
- Mandatory protection of research information of a third party.

9. DESCRIPTION OF THE RECORDS OF DR REDDY’S WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Certain legislation provides that private bodies shall allow certain persons access to specified records, upon request. Records are available in terms of the legislation detailed in Annexure 1 to this Manual (as amended from time to time).

Note that the information will only be provided in accordance with the requirements stipulated in the relevant pieces of legislation. If a requester believes that a right to access to a record exists in terms of the legislation above, or any other legislation, the requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

10. DESCRIPTION OF THE SUBJECTS ON WHICH DR REDDY’S HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY DR REDDY’S

Subjects on which the body holds records	Categories of records
Company Records	Certificate of incorporation; memorandum of Incorporation; records relating to the appointment of directors, public officer and other officers; and share register.
Personnel/Employee Records	HR policies and procedures, employment contracts; employment equity plan; medical aid records; provident fund records; salary records; disciplinary code; leave records.
Financial Records	Annual financial statements, tax returns, accounting records, banking records, financial policies and procedures, asset register; and invoices.

Subjects on which the body holds records	Categories of records
Income Tax Records	PAYE Records; records of payments made to SARS on behalf of employees; statutory compliances: - VAT; skills development levies; UIF; and Compensation Fund.
Procurement Records	<ul style="list-style-type: none"> - Supplier company information, banking information, VAT information, Supplier contact information, - Service providers' company information, banking information, VAT information, Supplier contact information.
Marketing Records	<ul style="list-style-type: none"> - Dispense data at pharmacy point at practice level (3rd party Impact RX) - Contact info at practice / Dr level for OCM messaging purpose
Risk Management and Compliance Records	Third party due diligence forms, compliance related policies.
SHE	Employee, or visitor records of access to premises, any SHE findings related to an individual, SHE committee appointment letters and training certificates.
IT Department	User account records including name, email, mobile phone number, manager, department, position, licenses and software allocated to users, IT equipment allocated to users including 4G card numbers allocated to users.

11. PROCESSING OF PERSONAL INFORMATION

11.1 Purpose of Processing Personal Information

Dr Reddy's recognizes the fundamental privacy rights of all individuals we interact with. We are committed to responsibly using personal Information in accordance with the relevant data privacy laws. The purpose for which personal information may be processed by Dr Reddy's will depend on the nature of the information and on the relationship we have with

the individual. Personal information is generally processed by Dr Reddy's for business administration purposes, including:

- to carry out contractual obligations
- to comply with obligations imposed by law;
- to protect the legitimate interests of the data subjects;
- or where it is necessary for pursuing the legitimate interests of Dr Reddy's.

Note that the above list is non-exhaustive.

11.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Dr Reddy's may process personal information in respect of the following categories of data subjects and information

Categories of Data Subjects

- Dr Reddy's personnel/ employees
- Health Care Professionals with whom we engage
- Consultants
- Suppliers
- Customers
- Patients
- Contractors
- Service providers
- Job applicants

Note that the above list is non-exhaustive.

Categories of Information

- In respect of natural persons such information may include: name, identifying number (identity or passport number), date of birth, citizenship, age, gender, race, marital status, language, telephone number(s), email address(es), physical and postal addresses, income tax number, banking information, disability information, employment history, background checks, fingerprints, CVs, education history, remuneration and benefit information, details related to employee performance and disciplinary procedures.

- In respect of juristic persons such information may include: name, registration number, tax information, contact details, physical and postal addresses, FICA documentation, BEE certificates, payment details (including bank accounts), invoices and contractual agreements.

Note that the above list is non-exhaustive and is dependent on the type of interaction the natural person has with us.

11.3 The recipients or categories of recipients to whom the personal information may be supplied

The recipients to whom personal information may be supplied by Dr Reddy's will depend on the nature of the information and the nature of the relationship with such recipient. Such categories of recipients would generally include

- Dr Reddy's affiliates;
- Dr Reddy's service providers;
- Medical aid, pension or provident funds;
- Auditing and accounting bodies (internal and external);
- Third parties contracted by Dr Reddy's for the retention of data;
- Relevant authorities, government departments, statutory bodies or regulators;
- A court, administrative or judicial forum, arbitration or statutory commission making a request in terms of applicable laws or rules.

Note that the above list is non-exhaustive.

11.4 Planned transborder flows of personal information

Dr Reddy's may transfer personal information to its affiliates and service providers situated outside of South Africa if the relevant business operations requires such transborder processing, and such transfers would be subject to the relevant provisions of POPIA.

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

Dr Reddy's has implemented appropriate technical and organizational measures to ensure that personal information remains protected. These measures have been designed to provide an adequate level of security, maintain confidentiality, and prevent

unauthorized access to personal information. The measures that have been implemented meet industry standards and ensure that they protect personal information in an appropriate manner that is required depending on the nature of the personal information.

12. AVAILABILITY OF THE MANUAL

12.1 A copy of the Manual is available-

12.1.1 on the Dr Reddy's main website: www.drreddys.co.za and any other websites offered by Dr. Reddy's in South Africa.

12.1.2 head office of Dr Reddy's for public inspection during normal business hours;

12.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

12.1.4 to the Information Regulator upon request.

12.1.5 fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

13. UPDATING OF THE MANUAL

Dr Reddy's will update this Manual at such intervals as may be necessary or as maybe directed by the Information Regulator.

Issued by

Information Officer

Shivani Singh

Country Head

Dr Rashem Mothilal

Annexure 1

RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION

Records are available in terms of the following legislation, as amended from time to time:

Basic Conditions of Employment Act No. 75 of 1997

Companies Act No. 71 of 2008

Compensation for Occupational Injuries and Disease Act No. 130 of 1993nic

Customs and Excise Act No. 91 of 1964

Electronic Communications Act 36 of 2005

Electronic Communications and Transactions Act No. 25 of 2002

Employment Equity Act No. 55 of 1998

Hazardous Substances Act No. 5 of 1973

Income Tax Act No. 58 of 1962

Labour Relations Act No. 66 of 1995

Medicines and Related Substances Act No. 101 of 1965

Occupational Health and Safety Act No. 85 of 1993 Patents Act No. 57 of 1987

Pension Funds Act No. 24 of 1956

Pharmacy Act No. 54 of 1974d

Promotion of Access to Information Act No. 2 of 2000

Skills Development Act No. 97 of 1998

Skills Development Levy Act No. 9 of 1999

South African Reserve Bank Act No. 90 of 1989

Unemployment Insurance Act No. 63 of 2001

Unemployment Insurance Contributions Act No. 4 of 2002

Value Added Tax Act No. 89 of 1991

Annexure 2



InfoRegSA-PAIA-For
m02-Reg7.pdf

Annexure 3



Form-3-PAIA.pdf