





MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 (as amended)	
Manual Owner	Wendy Pieterse (Company Secretary)
Approver	Caroline Davie (CFO)
Effective	April 2025
Review Date	Only as required
Manual no.	PAIA-2025
Version	4.0

#### PAIA MANUAL STATEMENT

- This manual forms part of the manual owner's internal business processes and procedures.
- Any reference to the "organisation" shall be interpreted to include the "manual owner".
- The organisation's governing body, its employees, contractors, customers, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the manual's requirements and undertake to comply with the stated processes and procedures.
- Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

#### MANUAL SIGN-OFF

By signing this document, I authorise the manual owner's adoption of the processes and procedures outlined herein.

<b>Name</b>	W Pieterse	C Davie
<b>Capacity</b>	Company Secretary	Chief Financial Officer
<b>Signature</b>		
<b>Date</b>	14 April 2025	14 April 2025

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### APPENDIX:

FORM 2: REQUEST FOR ACCESS TO INFORMATION:	<a href="https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf">https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf</a>
FORM 3: OUTCOME OF REQUEST AND FEES PAYABLE	<a href="https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf">https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf</a>

## 1 LIST OF ACRONYMS AND ABBREVIATIONS

- |      |                    |  |
|------|--------------------|--|
| 1.1. | <b>"CEO"</b>       | Chief Executive Officer;   |
| 1.2. | <b>"DIO"</b>       | Deputy Information Officer;  |
| 1.3. | <b>"IO"</b>        | Information Officer;   |
| 1.4. | <b>"Mondi"</b>     | Mondi South Africa (Pty) Ltd;                                      |
| 1.5. | <b>"Minister"</b>  | Minister of Justice and Correctional Services;                     |
| 1.6. | <b>"PAIA"</b>      | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.7. | <b>"POPIA"</b>     | Protection of Personal Information Act No. 4 of 2013 (as amended); |
| 1.8. | <b>"Regulator"</b> | Information Regulator; and   |
| 1.9. | <b>"Republic"</b>  | Republic of South Africa.  |

## 2 PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body 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 the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 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;
- 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 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;
- 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 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
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF MONDI

### 3.1 Chief Information Officer

Name: Ed Montocchio  
Tel: 031 451 2164  
Email: [ed.montocchio@mondigroup.com](mailto:ed.montocchio@mondigroup.com)

### 3.2 Deputy Information Officer (PAIA)

Name: Wendy Pieterse  
Tel: 031 451 2111  
Email: [wendy.pieterse@mondigroup.com](mailto:wendy.pieterse@mondigroup.com)

### Deputy Information Officer (POPIA)

Name: Brenda-Lee Lodder  
Tel: 031 451 2111  
Email: [brenda-lee.lodder@mondigroup.com](mailto:brenda-lee.lodder@mondigroup.com)

### 3.3 Access to information general contacts

Email: [PAIA.Requests@mondigroup.com](mailto:PAIA.Requests@mondigroup.com)

### 3.4 Head Office

Postal Address: P O Box 31024, Merebank, 4059  
Physical Address: Merebank Mill, Travancore Drive, Merebank, Durban, 4052  
Telephone: 031 451 2111  
Email: [PAIA.Requests@mondigroup.com](mailto:PAIA.Requests@mondigroup.com)  
Website: [www.mondigroup.com](http://www.mondigroup.com)

## 4 GUIDE ON HOW TO USE PAIA AND ACCESS TO THE GUIDE

- 4.1 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.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of-
- 4.3.1 the objects of PAIA and POPIA;
  - 4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
    - 4.3.2.1 the Information Officer of every public body, and
    - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 4.3.3 the manner and form of a request for-
    - 4.3.3.1 access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 4.3.3.2 access to a record of a private body contemplated in section 50<sup>4</sup>;

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> 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.*

<sup>4</sup> Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- 4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6 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-
  - 4.3.6.1 an internal appeal;
  - 4.3.6.2 a complaint to the Regulator; and
  - 4.3.6.3 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;
- 4.3.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8 the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9 the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92<sup>11</sup>.
- 4.4 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.
- 4.5 The Guide can also be obtained-
  - 4.5.1 upon request to the Information Officer;
  - 4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
  - 4.6.1 English; and
  - 4.6.2 Zulu.

- 
- 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.

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

## 5 MONDI RECORDS AVAILABLE WITHOUT FORMAL REQUEST

Mondi has elected, in terms of Section 52 of the Act, not to make available a list of automatically available records. All records of a public nature may be accessed on the Mondi Group website: [www.mondigroup.com](http://www.mondigroup.com), free of charge.

## 6 MONDI RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Category of record	Applicable Legislation
Accounting Records	Companies Act 89 of 1998; Income Tax Act 95 of 1967; Unemployment Contribution Act 4 of 2002; Unemployment Insurance Act 63 of 2001; Skills and Development Levies Act 9 of 1999; Value Added Tax Act 89 of 1991
Company Records	Companies Act 71 of 2008
Competition Records	Competition Act 89 of 1998
Consumer Records	Consumer Protection Act 68 of 2008
Copyright and Trademark Documents	Copyright Act 9 of 1978; Intellectual Property Laws Amendments Act 38 of 1997; Trademarks Act 194 of 1993
Employee Records	Basic Conditions of Employment Act 75 of 1977; Employment Equity Act 55 of 1998; Labour Relations Act 66 of 1995; Pension Fund Act 24 of 1956; Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
Data and Emails	Electronic Communications Act 36 of 2005; Electronic Communication and Transaction Act 2 of 2002
Treasury Records	SA Reserve Bank Act 90 of 1989
Safety	Occupational Health and Safety Act 85 of 1993
Miscellaneous	Protection of Personal Information Act No. 4 of 2013; Promotion of Access to Information Act 2 of 2000; Regional services Councils Act 109 of 1985

## 7 DESCRIPTION OF SUBJECTS AND CATEGORIES OF MONDI RECORDS

Subject	Categories
Secretarial Services	<ul style="list-style-type: none"> <li>Statutory records</li> <li>Share registers</li> <li>Minutes of Meetings</li> <li>Resolutions</li> </ul>
Public Corporate Records	<ul style="list-style-type: none"> <li>Memorandum of Incorporation</li> <li>Records relating to appointment of directors, officers and secretary</li> </ul>

Subject	Categories
Financial	<ul style="list-style-type: none"> <li>Annual Reports</li> <li>Tax Records</li> <li>Accounting Records</li> <li>Banking records</li> <li>Invoices</li> <li>Manager Accounts</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>Personnel information</li> <li>Employment contracts</li> <li>Leave records</li> <li>Career development records</li> <li>Employment equity</li> <li>General terms of employment</li> <li>UIF records</li> <li>Disciplinary records</li> </ul>
Legal	<ul style="list-style-type: none"> <li>General legal correspondence</li> <li>Patent records</li> <li>Property records</li> <li>Trademarks</li> <li>Litigation and dispute records</li> <li>PAIA Record</li> </ul>
Corporate Communications	<ul style="list-style-type: none"> <li>Media releases</li> <li>Brochures</li> <li>Employee communication</li> </ul>
Operations	<ul style="list-style-type: none"> <li>Customer agreements</li> <li>Standard trading terms and conditions</li> <li>Transport and vehicle records</li> <li>Divisional accounting and tax records</li> <li>General policies and guidelines</li> </ul>

## 8 PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

Mondi processes personal information for the purposes of, *inter alia*, employment, opening of accounts, registration on the supplier database, rendering of invoices, delivery of goods and contracting.

### 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Category of Data Subjects	Personal Information that may be processed
Customers/clients	Name, contact details, registration number or identity number, VAT number, employment status, credit checks, bank account details.
Employees and contractors	Full names, identity number, contact details, qualifications, gender, race, marital status, spouse's details, dependant details (including minors), citizenship status and nationality, income tax number, unemployment insurance number, beneficiary and emergency contact information, trade union membership, health, criminal checks, bank account details

Category of Data Subjects	Personal Information that may be processed
Service Providers	Name, contact details, registration number or identity number, VAT & Tax number, public liability insurance / workman's compensation, BBBEE status, employment status, bank account details, qualifications, medical conditions.

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

Category of Personal Information	Recipients or categories of Recipients to whom the personal information may be supplied
Identity number and names of employees (criminal checks)	South African Police Services
Qualifications of employees (qualification verification)	South African Qualifications Authority
Credit payment and history (Credit checks)	Credit Bureaus
Names and identity numbers of employees (medical aid and pension)	Medical Aids and Pension Funds (Anglomed and MMGF)

### 8.4 Planned trans-border flows of personal information

There are trans-border flows of personal information of employees. This personal information will be stored in Austria, or a country with similar regulations to GDPR/POPIA. No other trans-border flow of personal information takes place without approval by the POPIA governing body.

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

Mondi Group is an ISO27001 company with the necessary security measures in place. MSA is also governed by Mondi's Group Security policy that is audited by internal audit locally and globally. Such security measures include, *inter alia*, anti-virus procedures, data disaster recovery systems, user authentication systems.

## 9 AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on [www.mondigroup.com](http://www.mondigroup.com) ;

9.1.2 head office of Mondi South Africa (Pty) Ltd for public inspection during normal business hours;

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

9.1.4 to the Information Regulator upon request.

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



## 10 UPDATING OF THE MANUAL

The Manual Owner shall be responsible for updating this manual on a regular basis.

*Issued by*

A handwritten signature in black ink, appearing to read 'Ed Montocchio', positioned above a horizontal line.

**Ed Montocchio**

Chief Information Officer

## 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: 

--

Fax number: 

--

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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><i>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.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
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			

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

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(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)</i>	
Postal services to postal address	
Postal services to street address	
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>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <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 (Please specify)

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

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

-----  
**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

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

**FORM 3**  
**OUTCOME OF REQUEST AND OF FEES PAYABLE**  
[Regulation 8]

Note:

1. If your request is granted the—
  - (a) amount of the deposit, (if any), is payable before your request is processed; and
  - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

Personal inspection of information 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) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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**OR**

**2. You requested:**

Printed copies of the information (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 information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

**3. To be submitted:**

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (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)	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

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**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**5. Deposit payable (if search exceeds six hours):**

☐

Yes

☐

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_  
Name of account holder: \_\_\_\_\_  
Type of account: \_\_\_\_\_  
Account number: \_\_\_\_\_  
Branch Code: \_\_\_\_\_  
Reference Nr: \_\_\_\_\_  
Submit proof of payment to: \_\_\_\_\_

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

\_\_\_\_\_  
Information officer