

AAH INVESTMENT PROPERTIES (PTY) LTD

(“AAH Investment Properties”)

PAIA MANUAL

2025

TABLE OF CONTENTS

| | | |
|-----|--|----|
| 1 | DEFINITIONS | 2 |
| 2 | INTRODUCTION | 4 |
| 3 | PURPOSE OF PAIA MANUAL | 4 |
| 4 | DUTIES OF THE INFORMATION OFFICER | 4 |
| 4.1 | Right of Access..... | 4 |
| 4.2 | Grounds for Refusal..... | 5 |
| 5 | CONTACT DETAILS FOR ACCESS TO INFORMATION | 5 |
| 6 | PAIA GUIDE – HOW TO USE PAIA..... | 5 |
| 7 | CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO REQUEST | 6 |
| 8 | STATUTORY RECORDS WHICH ARE AVAILABLE | 7 |
| 9 | AVAILABILITY OF RECORDS – DESCRIPTION AND CATEGORIES OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS..... | 7 |
| 10 | PROCESSING OF PERSONAL INFORMATION | 9 |
| 11 | AVAILABILITY OF THE MANUAL | 11 |
| 12 | UPDATING OF THE MANUAL..... | 11 |
| | ANNEXURE A: REQUEST FOR ACCESS TO RECORD | 12 |
| | ANNEXURE B: PRESCRIBED FEES..... | 12 |
| | ANNEXURE C: OUTCOME OF REQUEST AND OF FEES PAYABLE | 12 |

1 DEFINITIONS

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|-----------------------------------|---|
| Data Subject | means the person to whom personal information relates |
| Deputy Information Officer | means the person to whom any power or duty conferred or imposed on an Information Officer by POPIA has been delegated |
| Head | <ul style="list-style-type: none"> ▪ in the case of a natural person, that natural person or any person duly authorised by that natural person; ▪ in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership; <ul style="list-style-type: none"> • the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or • the person who is acting as such or any person duly authorised by such acting person |
| Information Officer | means the responsible person who will ensure compliance with POPIA |
| Information Regulator | means the Regulator established in terms of Section 39 of POPI |
| PAIA | means the Promotion of Access to Information Act 2 of 2000 ("PAIA") |
| Person | means a natural person or a juristic person |
| Personal Information | information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person; the personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person |
| Personal Requester | A requester seeking access to a record containing personal information about the requester. |

| | |
|-----------------------------------|--|
| POPIA | means the Promotion of Personal Information Act 4 of 2013 ("POPIA") |
| Private body "Company" | <ul style="list-style-type: none"> ▪ a natural person who carries or has carried on any trade, business, or profession, but only in such capacity ▪ a partnership which carries or has carried on any trade, business, or profession; or ▪ any former or existing juristic person, but excludes a public body ▪ "AAH Investment Properties Proprietary Limited" |
| Processing | means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organising, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of personal information |
| Public body | <ul style="list-style-type: none"> ▪ any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or ▪ any other functionary or institution when: <ul style="list-style-type: none"> • exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or • exercising a public power or performing a public function in terms of any legislation |
| Requester | any person, including, but not limited to public body or an official thereof, making a request for access to a record of the company or a person acting on behalf of such person |
| Request for access | means a request for access to a record of the company in terms of section 50 of PAIA |
| Record | means any recorded information regardless of the form or medium, in the possession or under the control of the company irrespective of whether or not it was created by the company |
| Third Party | in relation to a request for access to a record held by the company, means any person other than the requester |

2 INTRODUCTION

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights. In terms of section 51 of PAIA, private institutions are obliged to compile a manual to facilitate the forementioned objective ("PAIA Manual").

3 PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 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;
- know the description of the records of the body which are available in accordance with any other legislation;
- 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;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 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;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- 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
- know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4 DUTIES OF THE INFORMATION OFFICER

The Information Officer and/or the Deputy Information Officer of the organisation are responsible for:

- Publishing and proper communication of the manual i.e. creating manual awareness;
- The facilitation of any request for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format; and
- Reviewing the manual for accuracy and communicating any amendments.

4.1 Right of Access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right;
- The requester complies with the procedural requirements relating to a request for access to that record; and

- Access to that record is not refused in terms of any of the grounds for refusal listed below.

The Requestor must complete and submit Annexure A to the organisation.

4.2 Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted and the Information Officer and/or Deputy Information Officer must complete Annexure C and make the completed Annexure available to the Requestor.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk; and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question, where there are no grounds for refusal, request for access will be granted.

5 CONTACT DETAILS FOR ACCESS TO INFORMATION

Chief Information Officer

Name: Mahomed Shakeel Mahomed
Tel: +27(0) 11 262 6433
Address: 164 Katherine Street, Pinmill Office Park
 Building 2
 Sandton
 2196

Access to information general contacts

Email: popia@grovest.co.za

6 PAIA GUIDE – HOW TO USE PAIA

The Information Regulator of the South African Human Rights Commission 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.

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

The aforesaid Guide contains the description of-

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of-
 - the Information Officer of every public body, and
 - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;
- the manner and form of a request for-
 - access to a record of a public body contemplated in section 11 ; and

- access to a record of a private body contemplated in section 50 ;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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-
 - an internal appeal;
 - a complaint to the Regulator; and
 - 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;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92 .

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.

The Guide can also be obtained-

- upon request to the Information Officer via email with a form that corresponds substantially with the form on Annexure A (Request for access to record);
- from the website of the Regulator - <https://info regulator.org.za/>

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

7 CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO REQUEST

Records of the Company which are available without a person having to request access include:

- Access to Information Manual
- Annual Financial Results / Statements (Investors only)
- BBBEE Certificate(s)
- Complaints Resolution and Procedure(s)
- Conflict of Interest Policy(ies) and Disclosure(s)
- Executive Officer Details: name, employment history, qualifications and date of appointment
- Fund Managers Details: name, address, contact details, qualifications and specialisation
- FSP Licence(s) and ancillary information
- Fund Performance Notices
- General company resolutions
- General shareholder certificates
- Group Corporate Structure and Information
- Group Privacy Policy(ies) and Procedure
- Products and services published on the Company website
- Newsletters
- Promotional and marketing material published on the Company website
- Disclosures

8 STATUTORY RECORDS WHICH ARE AVAILABLE

The company maintains statutory records and information in terms of the following legislation:

- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act, 4 of 2013
- Basic Conditions of Employment Act, 75 of 1997
- Labour Relations Act, 66 of 1995
- Financial Advisory and Services Intermediary Act, 37 of 2002
- Financial Sector Regulation Act, 9 of 2017
- Financial Intelligence Centre Act, 38 of 2001
- Companies Act, 71 of 2008
- Compensation of Occupational Injuries & Diseases Act, 130 of 1993
- Consumer Protection Act, 68 of 2008
- Copyright Act, 98 of 1978
- Disaster Management Act, 57 of 2002
- Electronic Communications and Transactions Act, 25 of 2002
- Employment Equity Act, 55 of 1998
- Income Tax Act, 58 of 1962
- Occupational Health and Safety Act, 85 of 1993
- Prevention of Organised Crime Act, 121 of 1998
- Prevention and Combatting of Corrupt Activities Act, 12 of 2004
- Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000
- Protection of Constitutional Democracy against Terrorist and related Activities Act, 33 of 2004
- Short-term Insurance Act, 53 of 1998
- Skills Development Act, 97 of 1998
- Trademarks Act, 194 of 1993
- Unemployment Insurance Act, 63 of 2001
- Value Added Tax Act, 89 of 1991

9 AVAILABILITY OF RECORDS – DESCRIPTION AND CATEGORIES OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS

The company maintains the following categories of data subjects;

| Category of Data Subject: | Record: | Availability: | Purpose: | Data Subject: |
|-----------------------------|----------------------------------|------------------|---------------------------|---------------|
| Public Affairs | Public Product Information | Freely Available | Convey Public Information | Organisation |
| | Public Corporate Records | Freely Available | Convey Public Information | Organisation |
| | Media Releases | Freely Available | Convey Public Information | Organisation |
| | Published Newsletters | Freely Available | Convey Public Information | Organisation |
| Regulatory & Administrative | Permits, Licenses or Authorities | Freely Available | Statutory Requirement | Organisation |
| | Conflict of Interest Management | Freely Available | Statutory Requirement | Organisation |

| | | | | |
|--|-----------------------------------|------------------|-------------------------|--------------|
| | Complaints Policy | Freely Available | Statutory Requirement | Organisation |
| | FICA Internal Rules | PAIA Request | Statutory Requirement | Organisation |
| | Health & Safety Plan | PAIA Request | Statutory Requirement | Organisation |
| | Memorandum of Incorporation | PAIA Request | Statutory Requirement | Organisation |
| | Minutes of Board or Directors | PAIA Request | Statutory Requirement | Organisation |
| | Register of Members | PAIA Request | Statutory Requirement | Organisation |
| | Register of Board of Directors | PAIA Request | Statutory Requirement | Organisation |
| | Internal correspondence s/memos) | PAIA Request | Internal Communications | Employees |
| | Professional Indemnity Insurance | PAIA Request | Risk Management | Organisation |
| | | | | |
| | Employment Applications | PAIA Request | Internal Referencing | Employees |
| | Employment Contracts | PAIA Request | Contractual Agreement | Employees |
| | Personal Information of Employees | PAIA Request | Internal Referencing | Employees |
| | Employment Equity Plan | PAIA Request | Statutory Requirement | Organisation |
| | Medical Aid Records | PAIA Request | Internal Referencing | Employees |
| | Pension Fund Records | PAIA Request | Internal Referencing | Employees |
| | Disciplinary Records | PAIA Request | Statutory Requirement | Employees |
| | Performance Management Records | PAIA Request | Internal Referencing | Employees |
| | Salary Records | PAIA Request | Internal Referencing | Employees |
| | Employee Benefit Records | PAIA Request | Internal Referencing | Employees |
| | PAYE Records | PAIA Request | Statutory Requirement | Employees |
| | Seta Records | PAIA Request | Statutory Requirement | Employees |
| | Disciplinary Code | PAIA Request | Statutory Requirement | Organisation |
| | Leave Records | PAIA Request | Internal Referencing | Employees |
| | Training Records | PAIA Request | Internal Referencing | Employees |
| | Training Manual | PAIA Request | Internal Referencing | Organisation |
| | | | | |
| | Financial Statements | PAIA Request | Internal Referencing | Organisation |
| | Financial and Tax Records | PAIA Request | Statutory Requirement | Organisation |
| | Asset Register | PAIA Request | Internal Referencing | Organisation |
| | Management Accounts and Reports | PAIA Request | Internal Referencing | Organisation |
| | Vouchers, Cash Books and Ledgers | PAIA Request | Internal Referencing | Organisation |
| | Banking Records and Statements | PAIA Request | Internal Referencing | Organisation |
| | Electronic Banking Records | PAIA Request | Internal Referencing | Organisation |
| | | | | |
| | Market Information | PAIA Request | Internal Referencing | Organisation |
| | Product Brochures | PAIA Request | Internal Referencing | Organisation |
| | Advertisements | PAIA Request | Internal Referencing | Organisation |
| | Field Records | PAIA Request | Internal Referencing | Organisation |
| | Performance Records | PAIA Request | Internal Referencing | Organisation |
| | Product / Service Sales Records | PAIA Request | Internal Referencing | Organisation |
| | Marketing Strategies | PAIA Request | Internal Referencing | Organisation |

| | | | | |
|--------------------|----------------------------------|--------------|----------------------------|-------------|
| Client Customer | Customer / Client Database | PAIA Request | Internal Referencing | Customers |
| | Customer / Client agreements | PAIA Request | Internal Referencing | Customers |
| | Customer / Client Files | PAIA Request | Internal Referencing | Customers |
| | Customer / Client Instructions | PAIA Request | Internal Communications | Customers |
| | Customer / Client Correspondence | PAIA Request | External Communications | Customers |
| Third Party | Rental agreements | PAIA Request | Contractual Agreement | Third Party |
| | Franchise agreements | PAIA Request | Contractual Agreement | Third Party |
| | Non-disclosure agreements | PAIA Request | Risk Management | Third Party |
| | Letters of Intent | PAIA Request | Contractual Agreement | Third Party |
| | Supplier Contracts | PAIA Request | Contractual Agreement | Third Party |

10 PROCESSING OF PERSONAL INFORMATION

Purpose of Processing Personal Information

AAH Investment Properties Proprietary Limited processes the personal information of its clients only for the purposes for which said information was collected and as agreed, for example:

- to provide our products or services to our clients;
- to execute transactions for and on behalf of our clients;
- to maintain and nurture our client relationships;
- to conduct credit reference searches and/or verification processes with third parties;
- to confirm and verify our client's identity or to verify that our clients are authorized users for security purposes, as the case may be;
- for the detection and prevention of fraud, crime, money laundering or other malpractice;
- for debt tracing and/or debt recovery;
- to conduct market or customer satisfaction research and for statistical analysis;
- for audit and record-keeping purposes;
- to liaise with third parties to offer services to our clients that form part of the products our clients have with us; and
- in connection with legal proceedings.

The categories of data subjects on which personal information is held and processed (but not limited to).

| Categories of Data Subjects | Personal Information that may be processed |
|-----------------------------|--|
| Customers / Clients | name, address, registration numbers or identity numbers, employment status, criminal record and bank details |
| Service Providers | names, registration number, vat numbers, address, trade secrets and bank details |
| Employees | address, qualifications, gender, race, tax reference number, contact number |
| Directors | address, qualifications, gender, race, tax reference number, contact number |
| Other Parties | Contractors, Suppliers, Attorney's, Auditors |

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

| Category of personal information | Recipients or Categories of Recipients to whom the personal information may be supplied |
|--|---|
| Identity number and names, for criminal checks | South African Police Services |
| Qualifications, for qualification verifications | South African Qualifications Authority |
| Credit and payment history, for credit information | Credit Bureaus |

Planned transborder flows of personal information

The company will only transfer personal information across South African borders to foreign countries, if

- it is necessary to comply with legislation,
- the transfer is necessary for the conclusion or performance of a contract of which data subjects may be parties,
- it protects the legitimate interest of the data subject, or
- is necessary for the company to pursue its legitimate interests, or that of a third party to which the data is supplied.

Before transferring personal information across a South African border to a foreign country, the company will take steps to ensure that recipients of trans-border personal information are bound by laws or agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

If the company relies on the legitimate interest of a data subject, prior to transferring personal information cross border, it will conduct a legitimate interest assessment.

Information Security Measures and safeguards

The company complies with POPIA in protecting the integrity and confidentiality of personal information. In doing so, it has due regard to generally accepted information security practices and procedures.

11 AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- head office for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

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

12 UPDATING OF THE MANUAL

The Head of AAH Investment Properties Proprietary Limited will on a regular basis update this manual.

The processes contained herein forms part of the Company's internal control structures and procedures.

Issued By



Mahomed Shakeel Mahomed
Information Officer