

NVest Financial Holdings LIMITED

(Registration number 2008/015990/06)

PAIA (PROMOTION OF ACCESS TO INFORMATION) INFORMATION MANUAL

Published in terms of Section 51 of the
Promotion of Access to Information Act, 2 of 2000 n("PAIA")

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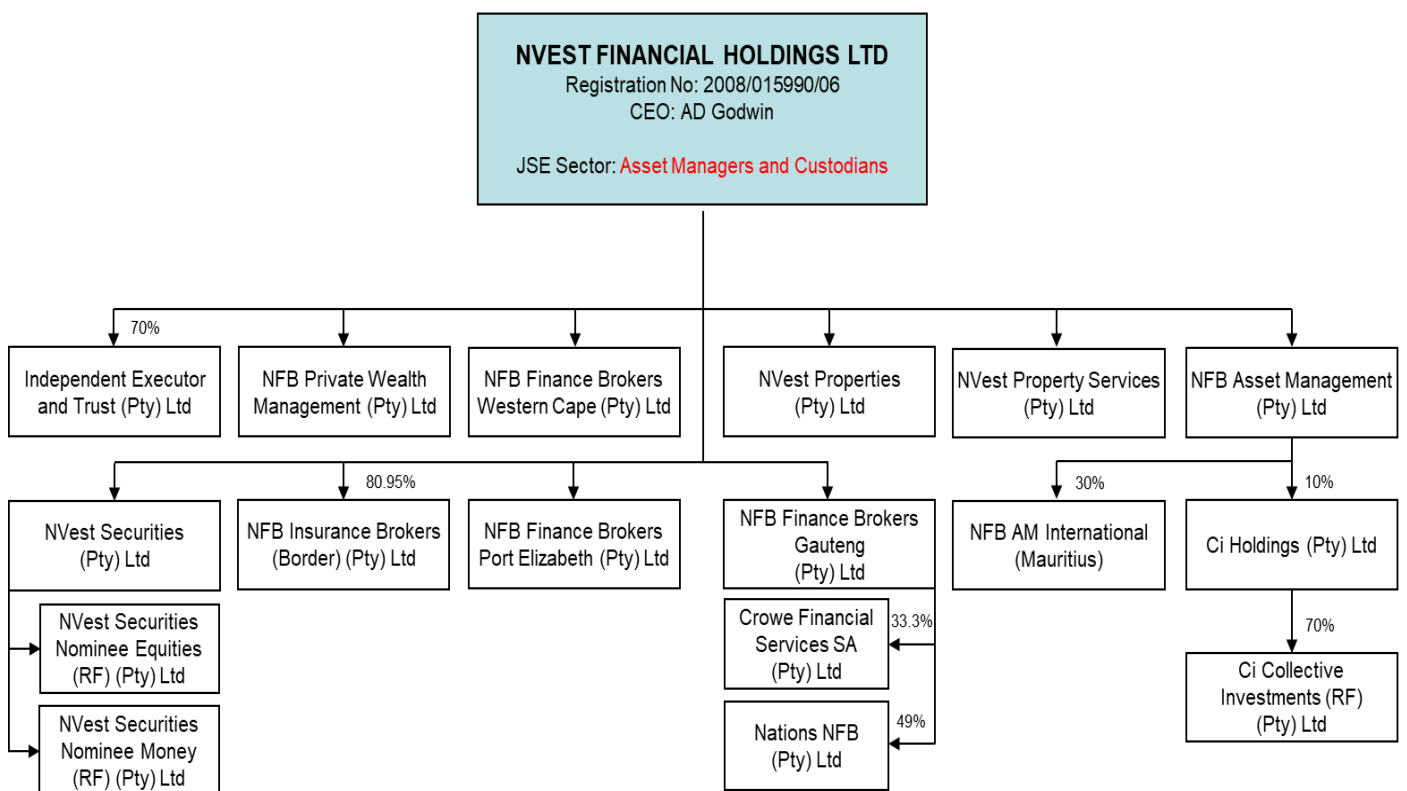
1. INTRODUCTION

- 1.1 The Promotion of Access to Information Act of 2000 (herein after referred to as “the Act”) was enacted with the purpose of addressing Section 32 (2) of the Constitution, which provides that any person has a right to gain access to any information held by a public or private body. If the record is requested from a private body the requester must to prove that the record is required for the exercise or protection of a right.
- 1.2 One of the main requirements specified in the Act is the compilation of a manual that provides information on both the types and categories of records held by the public or private body. In terms of the Act, a private body includes any former or existing juristic person.
- 1.3 This document serves as the Information Manual in terms of the above-mentioned Act, to provide a reference as to the records held and the process that needs to be followed to request access to such records.

2. COMPANY OVERVIEW

NVest Financial Holdings Limited (Registration number 2008/015990/06) hereafter referred to as NVest is the holding company for all of its wholly/majority owned subsidiaries and any company in which NVest has an investment interest which elects to subscribe to and apply this Policy. Where and when appropriate, the Group also refers to Employees and Directors of the Group. At the time of drafting the manual, the structure of the Group was as represented below, but is subject to change and does not impact on the definition of “the Group”. The subsidiary companies are as follows:

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3. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

3.1 Relevant contact details

Any person who wishes to request any information from the Group in order to protect or exercise a right may contact the information officer at the following contact details:

Postal Address	Physical Address
P O Box 8132 Nahoon East London 5210	NFB House 42 Beach Road, Nahoon East London 5210
E-mail: siviwek@nvestholdings.co.za	E-mail: siviwek@nvestholdings.co.za

Website: www.nvestholdings.co.za

3.2 Prescribed Access Form

3.2.1 A request for access to a record of the Group must be made in the prescribed form to the Group at the postal, physical, or email addresses provided above. The prescribed form is available on the South African Human Rights Commission at www.sahrc.org.za.

3.2.2 Requesters must:

- 3.2.2.1 Provide sufficient particulars to enable the Information Officer to identify the record/s requested and must indicate who the requestor is.
- 3.2.2.2 Indicate which form of access is required.
- 3.2.2.3 Specify a postal address or fax number of the requester in RSA.
- 3.2.2.4 Identify the right exercised or to be protected and why the record is required to exercise and protect that right.
- 3.2.2.5 Where they need to be informed of the decision on the request in any other matter, state the manner and particulars to be so informed.
- 3.2.2.6 If the request is made on behalf of a person, submit proof of their capacity to do so to the Information Officers satisfaction.

4. THE SECTION 10 GUIDE ON HOW TO USE THE PAIA

The Guide was compiled by the South African Human Rights Commission specifically to assist people to access records and exercise their right to information. The Guide is available in all South African Official languages free of charge and any person may request a copy of the guide. Please direct queries to:

The South African Human Rights Commission PAIA Unit

Physical address:
Braampark Forum 3,
33 Hoofd Street,
Braamfontein
South Africa

Postal address:
Private Bag X2700
Houghton 2041

Phone: +27 (11) 877 3600
Fax: +27 (11) 403 0625
Email: Section51.PAIA@sahrc.org.za
Website: www.sahrc.org.za

5. TYPES OF RECORDS HELD BY NVEST

Requests for access to documents held by the Group will be in accordance with the Act. The following records are available to the requester from the Group head office:

5.1 Human Resources Records

5.1.1 These include but are not limited to the following:

- 5.1.1.1 Any personal records provided to the Group by their personnel.
- 5.1.1.2 Any records a third party has provided to the Group about any of their personnel.
- 5.1.1.3 Conditions of employment and other personnel-related contractual and quasi-legal records.
- 5.1.1.4 Internal evaluation records.
- 5.1.1.5 Other internal records and correspondence.
- 5.1.1.6 Customer Related Records

5.1.2 A customer includes any natural or juristic entity who receives services from the Group. Customer related information includes but is not limited to the following:

- 5.1.2.1 Any records a customer has provided to a third acting for or on behalf of the Group.
- 5.1.2.2 Any records a third party has provided to the Group.
- 5.1.2.3 Records generated by or within the Group pertaining to the customer, including transactional records.

5.2 Financial, IT and Operational Records

5.2.1 This includes but is not limited to the following:

- 5.2.1.1 Financial records, operational records, databases, information technology, marketing records, internal correspondence, product records, statutory records, internal policies and procedures, treasury-related records, securities and equities, and records held by officials of the Group.

5.3 Other Parties

5.3.1 The Group may possess records pertaining to other parties, including without limitation, contractors, suppliers, subsidiary/holding companies, joint venture companies, service providers. Alternatively, such other parties may possess records which can be said to belong to the Group. The following records fall under this category:

- 5.3.2 Personnel, customer or the Group records which are held by another party as opposed to being held by the Group.
- 5.3.3 Records held by the Group pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.

5.4 Publicly available records

The Group will set out records which are already publicly available without a request for access in terms of the Act:

- Group annual Financial statements; and
- Group interim audited report.

5.5 Records available in terms of other legislation

5.5.1 The requester may also request information which is available in terms of legislation, such as the following:

- 5.5.1.1 Basic Conditions of Employment Act
- 5.5.1.2 Labour Relations Act
- 5.5.1.3 Companies Act
- 5.5.1.4 Unemployment Insurance Act
- 5.5.1.5 Compensation for Occupational Injuries & Diseases Act
- 5.5.1.6 Long Term Insurance Act
- 5.5.1.7 Employment Equity Act
- 5.5.1.8 Occupational Health and Safety Act
- 5.5.1.9 National Credit Act
- 5.5.1.10 Promotion of Equality and Prevention of Unfair Discrimination Act
- 5.5.1.11 Pension Funds Act
- 5.5.1.12 Electronic Communications and Transactions Act
- 5.5.1.13 Financial Services Board Act & Short Term Insurance Act
- 5.5.1.14 Income Tax Act,
- 5.5.1.15 Skills Development Act
- 5.5.1.16 Skills Development Levies Act
- 5.5.1.17 South African Qualification Authority Act
- 5.5.1.18 VAT Act
- 5.5.1.19 Financial Intelligence Centre Act
- 5.5.1.20 Financial Advisory and Intermediary Services Act
- 5.5.1.21 Protection of Constitutional Democracy Against Terrorist and related Activities Act

6. THE REQUEST PROCEDURE

- 6.1 The requester must use the prescribed form to make the request for access to a record to the above the Group address, fax number or email address for the attention of the Information Officer;
- 6.2 The Information Officer will notify the requester of the prescribed fee (if any) payable before processing the request;
- 6.3 A requester seeking access to a record containing their own personal information will not be charged a request fee;
- 6.4 The fee that the requester must pay to the Group is R3.50 per page. The requester may lodge an application to court against the tender or payment of the fee;
- 6.5 If the request is granted the requester will be accordingly notified and a further fee must be

paid. This would be for the search, reproduction, preparation, and time that exceed the prescribed hours to search and prepare the disclosure.

7. DECISION

- 7.1 The Group will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons to that effect.

- 7.2 The 30 day period may be extended for further period of no more than 30 days if the request is for a large amount of information, or the request requires a search for information held at another office within the Group and the information cannot reasonably be obtained within the original 30 days period. The Group will notify the requester in writing should an extension be sought.

8. AVAILABILITY OF THE MANUAL

This manual is also available for inspections at the Group's head office, free of charge, and on the NVest Holdings website.