

PAIA Manual

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

VALUE PORTFOLIO MANAGERS (PTY) LTD

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1. LIST OF ACRONYMS AND ABBREVIATIONS

Term	Meaning
"Act" or "PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as amended)
"Information Regulator"	The Information Regulator of South Africa, established in terms of section 39 of POPIA
"IO"	Information Officer
"Manual"	This PAIA Manual, as amended from time to time
"Minister"	Minister of Justice and Correctional Services
"POPIA"	Protection of Personal Information Act No. 4 of 2013
"Republic"	Republic of South Africa
"VPM"	Value Portfolio Managers (Pty) Ltd

2. PURPOSE OF THIS MANUAL

This Manual is useful for the public to—

- 2.1 check the categories of records held by VPM 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 VPM, by providing a description of the subjects on which VPM holds records and the categories of records held on each subject;
- 2.3 know the description of the records of VPM 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 Information Regulator and how to obtain access to it;
- 2.6 know if VPM processes personal information, the purpose of such processing and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.8 know if VPM has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.9 know whether VPM has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS

3.1 Information Officer

Detail	Information
Name	Msawenkosi Godfrey Nkosi

Telephone	(011) 622 7692 / 626 9900
Email address	musa@valueportfolio.co.za
Fax number	N/A

3.2 Access to Information — General Contact

Detail	Information
Email	musa@valueportfolio.co.za
Website	https://www.valueportfolio.co.za/privacy-policy

3.3 National / Head Office

Detail	Information
Postal Address	P O Box 1727, Bedfordview, 2008
Physical Address	15 Boeing Road West, Bedfordview, 2007
Telephone	(011) 622 7692 / 626 9900
Email	valuepm@worldonline.co.za
Website	https://www.valueportfolio.co.za/

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

4.1 The Information 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 a 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 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;

4.3.3 the manner and form of a request for access to a record of a public body (section 11) and a private body (section 50);

4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

4.3.5 the assistance available from the Information 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 an internal appeal, a complaint to the Information Regulator, and an application with a court;

- 4.3.7 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;
 - 4.3.8 the provisions of sections 15 and 52 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 and 54 regarding fees to be paid in relation to requests for access; and
 - 4.3.10 the regulations made in terms of section 92.
- 4.4 Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Information Regulator, during normal working hours.
- 4.5 The Guide can also be obtained upon request to the Information Officer, or from the website of the Information Regulator at <https://info regulator.org.za/>.

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following categories of records are automatically available for inspection or copying without submitting a formal PAIA request:

Category of Records	Types of Records	Availability
Public-facing policies and notices	Privacy Policy, PAIA Manual, Terms and Conditions	Freely available on website
Regulatory licences	FSCA FSP Licence (FSP 635)	Freely available on request
Marketing and information material	Newsletters, brochures, pamphlets, reports intended for public viewing	Freely available

The only fee payable for access to the records listed in this section is the prescribed reproduction fee.

6. DESCRIPTION OF RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Records are kept in accordance with such other legislation as is applicable to VPM, which includes but is not limited to the following:

Category of Records	Applicable Legislation
Privacy Policy	Protection of Personal Information Act 4 of 2013
PAIA Manual	Promotion of Access to Information Act 2 of 2000
FICA Risk Management and Compliance Programme	Financial Intelligence Centre Act 38 of 2001
Termination / Business Continuity Policy	Financial Advisory and Intermediary Services Act 37 of 2002
Memorandum of Incorporation	Companies Act 71 of 2008
Employment records	Labour Relations Act 66 of 1995 Basic Conditions of Employment Act 75 of 1997
Tax records	Income Tax Act 58 of 1962

	Value Added Tax Act 89 of 1991
B-BBEE records	Broad-Based Black Economic Empowerment Act 53 of 2003
Employment equity records	Employment Equity Act 55 of 1998
UIF and skills levies records	Unemployment Insurance Act 63 of 2001 Skills Development Levies Act 9 of 1999

7. DESCRIPTION OF SUBJECTS ON WHICH VPM HOLDS RECORDS AND CATEGORIES OF RECORDS

Subjects on which VPM holds records	Categories of records
Company Secretarial and Legal	Statutory company records; minutes and related meeting information; records of executive decisions; memorandum of incorporation; shareholder records
Client and Portfolio Management	Client agreements and mandates; portfolio management instructions; investment records; AML/KYC documentation; beneficial ownership records
Compliance	Compliance policies and procedures; regulatory licences; regulatory and industry body correspondence; FICA risk management and compliance programme
Finance	Invoices; finance-related policies and procedures; annual financial statements; asset register; bank records; tax records
Human Resources	Employee records; employment contracts; HR policies and procedures; payroll records; employment equity records
Information Technology	IT policies and procedures; disaster recovery plan; system security records
Risk	Asset risk register; internal audit plan and reports; business continuity plan
Marketing	Market information; internal publications and newsletters; client communication records
Strategic Documents	Annual reports; strategic plans; annual performance plans

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

VPM may collect, transfer, share and otherwise process personal information for purposes including but not limited to—

- fulfilling and providing the services, products or offerings you have requested, and notifying you about important changes thereto;
- managing your account or our relationship, and complying with your instructions or requests;

- providing your personal information to our partners responsible for the management of the various portfolios;
- detecting and preventing fraud, money laundering and terrorist financing, and related crime prevention;
- assessing and dealing with complaints;
- operational, marketing, auditing, legal and record-keeping requirements;
- verifying your identity and the identities of beneficial owners of entities; and
- compliance with applicable legal and regulatory requirements.

VPM processes personal information on one or more of the following lawful bases: consent; conclusion and performance of a contract; compliance with a legal obligation; protection of a legitimate interest of the data subject; proper performance of a public law duty; or pursuance of a legitimate interest of VPM or a third party.

Full details are set out in VPM's Privacy Policy, available at <https://www.valueportfolio.co.za/> or upon request to the Information Officer.

8.2 Categories of Data Subjects and Personal Information Processed

Categories of Data Subjects	Personal Information that may be Processed
Clients / Prospective Clients (Natural Persons)	Name; contact details; physical and postal address; date of birth; identity / passport number; tax number; employment status; bank details; investment information; AML/KYC documentation
Clients / Prospective Clients (Juristic Persons)	Name of legal entity; registration and VAT numbers; physical / postal address; names and contact details of authorised representatives; bank details; beneficial ownership information
Contracted Service Providers / Vendors	Name of legal entity; registration and VAT numbers; physical and postal address; names of contact persons; bank details; trade and contractual information
Employees / Potential Employees	Full name; gender; marital status; race; age; identity number; physical and postal address; qualifications; employment history; payroll and tax information; health information (where applicable)

8.3 Recipients or Categories of Recipients to whom Personal Information may be Supplied

VPM's operations require transfers to third parties and/or operators, including but not limited to—

- portfolio managers and custodians, for the management and safekeeping of client assets;
- banks, brokers and advisors, for compliance with their own AML/KYC due diligence obligations;
- external auditors, for audit of VPM and client entities;
- regulatory and supervisory bodies (including the FSCA and Financial Intelligence Centre) where required by law;
- credit bureaux and verification services, for identity and credit checks;
- IT and cloud service providers, for system operation and data storage;
- legal advisors, in connection with legal proceedings or advice; and
- any other person as agreed with a client or as required or expressly permitted by applicable law.

8.4 Planned Transborder Flows of Personal Information

Personal information will primarily be processed within the Republic of South Africa in accordance with POPIA. To the extent that VPM engages cloud service providers, sub-processors or partners that

process data outside South Africa or the European Union, VPM ensures that appropriate safeguards are in place, including contractual protections to GDPR / POPIA-equivalent standards. Further details are set out in VPM's Privacy Policy.

8.5 Information Security Measures

VPM is committed to ensuring the confidentiality, integrity and availability of personal information. Security measures include but are not limited to—

- Encryption: AES-256 for data at rest; TLS 1.2+ for data in transit.
- Access Controls: Role-based access, least-privilege principle, and multi-factor authentication.
- physical security: restricted access to server rooms, CCTV monitoring, and secure disposal of paper records;
- monitoring and logging: continuous monitoring, audit logs and anomaly detection;
- data minimisation: collecting only necessary data and anonymising or pseudonymising where possible; and
- incident response: a documented breach-response plan with Information Regulator and client notification protocols.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of this Manual is available at the head office of VPM for public inspection during normal business hours.

9.2 A copy is available on VPM's website at <https://www.valueportfolio.co.za/>.

9.3 A copy is available to any person upon request and upon payment of the prescribed fee.

9.4 A copy is available to the Information Regulator upon request.

9.5 A fee for a copy of this Manual, as contemplated in Annexure B of the Regulations, is payable per A4-size photocopy made. The prescribed forms and fees are available at <https://inforegulator.org.za/>.

10. CHANGES

The Information Officer will review and update this Manual on a regular basis. Any changes will be reflected in a revised revision date on the cover page.

Issued by

MSAWENKOSI GODFREY NKOSI

Information Officer

Value Portfolio Managers (Pty) Ltd

October 2025