

Manual contemplated in terms of Section 51 of the Promotion of Access to Information Act, No 2 of 2000, for the following entities:

- Nedgroup Investments (Pty) Limited
- Nedgroup Investment Advisors Limited
- Nedgroup Collective Investments Limited
- Nedgroup Investments Pension Preservation Fund
- Nedgroup Investments Provident Preservation Fund
- Nedgroup Investments Retirement Annuity Fund

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A. Introduction to Entities

Our unit trusts are administered by Nedgroup Collective Investments Limited that is registered as a manager in terms of the Collective Investment Schemes Control Act.

Investment Consulting is performed by Nedgroup Investment Advisors Limited that is an authorised financial services provider under the Financial Advisory and Intermediary Services Act.

Nedgroup Investments (Pty) Limited is a member of the Association for Savings and Investment SA.

The head of Nedgroup Investments (Pty) Limited have tasked Legal and Compliance to attend to all matters relating to this Act.

B. Particulars in terms of the Section 51 Manual

This Manual has been compiled in accordance with the Promotion of Access to Information Act 2 of 2000 (the Act) and applies to all the identified entities.

1. Contact details

Nedgroup Investments (Pty) Limited will deal with all requests relating to any of the entities. All requests for information in terms of this manual should be directed to:

The Information Officer

Nedgroup Investments (Pty) Limited
BoE Clocktower, Clocktower Precinct
Cape Town
8001

PO Box 1510
Cape Town
8000

Tel No: 0860 123 263 (RSA only)
+27 21 416 6011 (outside RSA)
Fax No: 0861 119 733 (RSA only)
+27 11 263 6067 (outside RSA)

Email: clientservices@nedgroupinvestments.co.za

2. The section 10 Guide on how to use the Act

Should you require greater clarity on, or assistance with, the Act, we refer you to the Guide that must be published by the Human Rights Commission in terms of section 10 of the Act. It will, *inter alia*, include:

- what the objects of this Act are;
- the relevant contact details of each public and private body (where possible);
- the process that needs to be followed in order to request access to records;
- assistance available from the “SAHRC” and information officers of public bodies;
- how to get access to the manual of a private body;
- all the remedies available in law to you; and
- details on prescribed fees payable in respect of requests for information.

The Guide will be printed in each official language in the *Government Gazette* and will be available for inspection by the public at the offices of the Human Rights Commission.

Please direct any queries to:

**The South African Human Rights Commission:
PAIA Unit
The Research and Documentation Department**

Postal address: Private Bag 2700
Houghton
2041
Telephone: +27 11 484 8300
Fax: +27 11 484 0582/1360
Website: www.sahrc.org.za
E-mail: PAIA@sahrc.org.za

3. Types of Records

(a) Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to any of the entities listed in this Manual and the Financial Services Industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

(b) Records available without requesting access in terms of the Act

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the Gazette.

The identified entities have not submitted any such description for publication in the Gazette. Certain records are, however, freely available on the website at www.nedgroupinvestments.co.za

(c) Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in the Act, available for the purposes of the Act:

Records are held on the following subjects:

- Personnel records.
- Client-related records.
- Private body record (Records relating to Nedgroup Investments (Pty) Limited).
- Records in the possession of or pertaining to other parties.

(i) Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to the private body by their personnel;
- Any records a third party has provided to the private body about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records;
- Other internal records and correspondence;
- Training schedules and material.

(ii) Client-related records

A client includes any natural or juristic entity, who receives services from the private body. Client-related information includes the following:

- Any records a client has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the client, including transactional records

(iii) Private body records

The following are considered to include but not be limited to records, which pertain to the private body's own affairs:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

(iv) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers. Alternatively, such other parties may possess records, which can be said to belong to the private body.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body 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.

4. Requesting procedures

A person who wants access to the records of any of the identified entities must complete the necessary request form.

The request form can be accessed on www.nedgroupinvestments.co.za or www.sahrc.org.za. If a person needs assistance to obtain the form or on any other matter, please contact the Information Officer at the telephone number provided in clause 1.

The completed request form must be sent to the address or fax number provided in clause 1 and marked for the attention of the Information Officer.

The Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on www.nedgroupinvestments.co.za.

All the pertinent sections must be completed fully, failing which the process will be delayed while the Information Officer requests such additional information.

Note: Access to certain records may be or must be denied on the grounds set out in the Act.

Mandatory grounds for refusal include but are not limited to:

- Information for the protection of the privacy of individuals.
- Information for the protection of commercial information and confidential information of third parties.
- Information privileged from production in legal proceedings.
- Commercial information of the company.
- Research information.

5. Availability of the manual

Copies of this manual are available for inspection, free of charge, at our offices; copies are also available from the South African Human Rights Commission and on our website (www.nedgroupinvestments.co.za).