

PAIA Manual

Promotion of Access to Information Act 2 of 2000

MPOWER HOLDINGS (PTY) LTD

Registration Number: 2011/104748/07

This manual has been compiled in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act 4 of 2013 ("POPIA"). It is published by MPOWER HOLDINGS (PTY) LTD, Registration Number 2011/104748/07 ("the Company", "we", "us", or "our"), in its capacity as a South African holding company.

The purpose of this manual is to give effect to the constitutional right of access to information as contemplated in section 32 of the Constitution of the Republic of South Africa, 1996, and to inform members of the public of the records held by the Company, the subjects on which those records are held, and the procedure and fees applicable when requesting access to such records.

This manual is available on our website at www.mpowerholdings.co.za, at our principal place of business during normal business hours, and on request from our Information Officer. It will be updated as required when changes occur in our operations or when relevant legislation is amended.

This manual relates specifically to records held by MPower Holdings as a holding company. Each subsidiary or group company maintains its own PAIA Manual in respect of its own records. Requests for access to records held by a specific group company should be directed to that group company's Information Officer.

1. Contact Details of the Company

The details of MPOWER HOLDINGS (PTY) LTD are as follows:

Registered Name	MPOWER HOLDINGS (PTY) LTD
Registration Number	2011/104748/07
Physical Address	1 Amatole Street, N4 Gateway Industrial Park, Willow Park Manor X65, Pretoria 0184, Gauteng, South Africa
Postal Address	1 Amatole Street, N4 Gateway Industrial Park, Willow Park Manor X65, Pretoria 0184, Gauteng, South Africa
Telephone	+27 18 632 0050
Email Address	info@mpowerholdings.co.za
Website	www.mpowerholdings.co.za
Information Officer	Pieter Espach

2. Group Structure

MPower Holdings is a diversified holding company with a portfolio of subsidiaries operating across South African agriculture. The group companies of MPower Holdings include, without limitation:

- Africom Agri
- Enviro Bio-Chem
- Blum Biologicals
- Nigelchem
- Didymus Farming
- Didymus Meatmasters
- QT Boran
- Farmfed Meat
- Oupa's Biltong
- Triomf RDC
- Parc Agro

Each group company is a separate legal entity and maintains its own PAIA Manual, records, and Information Officer. Requests for records relating specifically to the operations, customers, or activities of a group company should be directed to that group company. Requests relating to MPower Holdings itself, or to shared services and group-level records, should be directed to MPower Holdings.

3. The Information Regulator

PAIA and POPIA are both administered and enforced by the Information Regulator of South Africa, an independent body established under POPIA. Any person wishing to exercise rights under PAIA or POPIA, or to lodge a complaint, may contact the Information Regulator as follows:

Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
General Enquiries	enquiries@inforegulator.org.za
PAIA Complaints	PAIAComplaints@inforegulator.org.za
POPIA Complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

4. The Guide to PAIA

The Information Regulator has compiled a guide, as contemplated in section 10 of PAIA, to assist persons wishing to exercise any rights under PAIA or POPIA. This guide is available in all eleven official languages and in braille and may be obtained from the Information Regulator at www.inforegulator.org.za or by submitting a request using the prescribed Form 1.

5. Categories of Requesters

The capacity in which a request is made determines the category of requester. The Company recognises the following four categories:

- A data subject who makes a request for access to their own personal information held by the Company.
- A representative who makes a request on behalf of a data subject, in which case proof of authority to act in that capacity must be provided.
- A third party who requests access to information about another data subject. Such requests will be assessed against the grounds for refusal set out in Chapter 4 of PAIA, including the protection of personal information of natural and juristic persons.
- A public body or person acting in the public interest, making a request for information in furtherance of a legitimate public purpose.

6. Records Available Without a Formal PAIA Request

The following records and documents are made freely available by the Company without the need to submit a formal PAIA request. These may be accessed on our website at www.mpowerholdings.co.za or requested directly from the Information Officer at info@mpowerholdings.co.za, free of charge:

- Privacy Policy
- Website Disclaimer and Terms of Use
- Cookie Policy
- Procurement Processing Notice
- Company profile and information about our group companies
- This PAIA Manual

7. Records Available in Terms of Other Legislation

The Company holds records in accordance with the following South African legislation, among others. Records created and maintained under these Acts may be accessible subject to the provisions of PAIA and the relevant legislation:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998

- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Tax Administration Act 28 of 2011
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

8. Categories of Records Held by the Company

The Company holds records relating to the following subjects and categories, primarily reflecting its role as a holding company. These descriptions are provided in sufficient detail to assist a requester in identifying the record they wish to access. The inclusion of a record category in this manual does not guarantee that a request for access will be granted, all requests will be evaluated on their merits in accordance with PAIA.

8.1 Corporate and Statutory Records

- Company registration documents and certificates of incorporation
- Memorandum of incorporation and any amendments thereto
- Minutes of directors' meetings, board committee meetings, and shareholders' resolutions
- Share register and records of directors and officers
- Corporate governance policies and codes
- Annual financial statements and audit reports
- Tax registration certificates and SARS correspondence

8.2 Group and Investment Records

- Records relating to the acquisition, disposal, and management of subsidiaries and investments
- Group organisational structure and corporate governance frameworks

- Intra-group agreements, service level agreements, and shared services arrangements
- Consolidated financial reporting and group performance records
- Records of board oversight of group companies

8.3 Supplier and Third-Party Records

- Supplier contracts and service agreements at group level
- Purchase orders and delivery records
- Supplier invoices and payment records
- Vetting and due diligence records

8.4 Employee and Human Resources Records

- Employment contracts and letters of appointment for MPower Holdings staff
- Payroll and remuneration records
- Leave records and attendance records
- Disciplinary and grievance records
- Occupational health and safety records
- Training records and certifications

8.5 Financial Records

- General ledger and accounting records
- Bank statements and reconciliations
- VAT returns and tax records
- Records of assets, liabilities, and investments
- Treasury and funding records

8.6 Compliance and Governance Records

- Group compliance policies, including anti-bribery, anti-corruption, and competition compliance
- POPIA compliance records, including processing records and breach notification records
- B-BBEE certificates and verification records
- Correspondence with regulatory authorities
- Internal audit and risk management records

8.7 Website and Digital Records

- Website user enquiries and contact form submissions
- Cookie consent records and direct marketing consent logs
- Website analytics data in anonymised form

- IT access logs and electronic correspondence (subject to retention policies)

9. Records Classification Key

Upon receipt of a request for access to information, records will be assessed and classified in accordance with the following key, which maps each classification to the relevant PAIA section governing whether access may or may not be granted:

No.	Access	Classification	PAIA Reference
1	May be disclosed	Publicly accessible document — no grounds for refusal apply	Section 50(1)
2	May not be disclosed	Request made after commencement of criminal or civil proceedings	Section 7
3	May be disclosed	Subject to copyright — access granted with appropriate notice	Copyright Act
4	Limited disclosure	Personal information belonging to the requester themselves	Section 61
5	May not be disclosed	Unreasonable disclosure of personal information of a natural or juristic person	Section 63(1)
6	May not be disclosed	Disclosure likely to harm the commercial or financial interests of a third party	Section 64(a) & (b)
7	May not be disclosed	Disclosure likely to harm the Company or a third party in contract or other negotiations	Section 64(c)
8	May not be disclosed	Disclosure would breach a duty of confidence owed to a third party under an agreement	Section 65
9	May not be disclosed	Disclosure likely to compromise the safety of individuals or the protection of property	Section 66
10	May not be disclosed	Legally privileged document	Section 67
11	May not be refused	Environmental or public safety risk — disclosure in the public interest overrides refusal	Section 64(2) & 68(2)
12	May not be disclosed	Confidential commercial information of the Company	Section 68
13	May not be disclosed	Disclosure likely to prejudice research and development information of the Company or a third party	Section 69
14	May not be refused	Disclosure clearly in the public interest despite potential harm to a third party	Section 70

10. Personal Information Processed (POPIA Section 17 Record)

In accordance with section 17 of POPIA, the Company maintains a record of the personal information it processes. The following is a summary of that record.

10.1 Categories of Data Subjects

- Directors, officers, and shareholders of MPower Holdings and its group companies
- Employees of MPower Holdings and job applicants
- Suppliers, vendors, and service providers, and their representatives
- Professional advisors and consultants engaged by the group
- Business partners, counterparties, and investors
- Website visitors and online enquirers

10.2 Categories of Personal Information Processed

- Identity information: full name, identity or passport number, or company registration number
- Contact information: email address, telephone number, physical and postal address
- Financial information: banking details, credit information, and transaction history
- Tax-related information: VAT numbers, tax clearance, and B-BBEE certificates
- Employment information: employment history, qualifications, remuneration, and leave records (employees only)
- Technical information: IP address, browser type, device information, and website usage data (website visitors)
- Communication records: correspondence, meeting records, and support interactions

10.3 Purposes of Processing

- Corporate governance and management of the Company and its group
- Investment and portfolio management
- Group procurement, shared services, and inter-group coordination
- Payment processing, financial record-keeping, and credit management
- Employment administration and human resources management
- Website analytics and improvement of our online services
- Marketing communications, where consent has been obtained
- Compliance with legal, regulatory, and reporting obligations
- Fraud prevention, security, and protection of legitimate interests

10.4 Recipients of Personal Information

- Group companies, subsidiaries, and affiliated entities
- Banks, payment processing providers, and credit bureaus
- IT, hosting, and cloud service providers
- Professional advisors including auditors, attorneys, and consultants

- Regulatory and government authorities, where required by law

10.5 Cross-Border Transfers

Although the Company operates in South Africa, certain service providers used by the Company (including cloud hosting, email, analytics, and productivity providers) may process data on servers located outside of South Africa. As a result, personal information may be transferred across borders. The Company takes reasonable steps to ensure that such transfers comply with section 72 of POPIA, including verifying that recipients are subject to adequate data protection obligations. A current list of providers involved in cross-border transfers is available on request from the Information Officer.

10.6 Information Security Measures

The Company has implemented the following technical and organisational measures to protect personal information:

- HTTPS encryption across the Company website
- Firewalls, anti-virus, and anti-malware protection with regular updates
- Logical and physical access controls restricting personal information to authorised personnel only
- Encryption of data in transit and, where appropriate, at rest
- Secure setup and maintenance of hardware and software infrastructure
- Vendor due diligence and contractual safeguards with service providers
- Regular review of security practices and systems
- Staff awareness and training on data protection obligations under POPIA
- Secure deletion or anonymisation of personal information once no longer required

11. How to Make a Request for Access to Records

11.1 Who May Request Access

Any person, including a juristic person, may request access to a record held by the Company if that record is required for the exercise or protection of a right. A requester may act on their own behalf or on behalf of another person, provided that proof of authority is submitted with the request.

11.2 The Prescribed Form

All formal requests must be submitted on the prescribed Form C (Form J752 — Request for Access to Record of Private Body), which is reproduced as Annexure A to this manual and is also available from the Information Regulator at www.inforegulator.org.za. Completed forms must be submitted to the Information Officer using the contact details in section 1 of this manual.

11.3 Information Required in a Request

A valid PAIA request must include the following:

- The full name, postal address, and contact details of the requester
- Details of the capacity in which the request is made, if applicable, with supporting proof
- A description of the record requested in sufficient detail to allow the Company to identify it
- The form in which access is requested — for example, a copy, inspection, or transcription
- The right the requester seeks to exercise or protect, and an explanation of why the record is required
- Proof of identity of the requester

11.4 Request Fee

A request fee of R140.00 is payable before the Company is required to process a formal PAIA request. The Company will notify the requester of payment details upon receipt. The request fee may be waived where the requester can demonstrate financial hardship. No request fee is payable where the requester is seeking access to their own personal information.

11.5 Access Fee

If the request is granted, an access fee may be payable to cover reproduction and preparation costs. The applicable access fees are set out in Annexure B to this manual and are prescribed by regulation under PAIA.

11.6 Response Time

The Company will respond within 30 days of receipt of a complete and valid request. Where an extension is required, the requester will be notified, and the extension may not exceed a further 30 days. Where access is refused, the requester will be informed in writing of the reasons and their right to appeal or seek judicial review.

11.7 Grounds for Refusal

The Company may refuse access to records on the grounds set out in Chapter 4 of PAIA, including but not limited to:

- The record contains personal information about a third party who has not consented to its disclosure
- The record contains confidential commercial information or trade secrets
- Disclosure would constitute a breach of a duty of confidence owed to a third party
- Disclosure would prejudice the safety of any person
- The record is protected by legal professional privilege
- The record contains confidential information relating to the affairs of a group company that has not consented to its disclosure
- The request is clearly frivolous or vexatious, or would involve an unreasonable diversion of resources

11.8 Right to Appeal

A requester who is aggrieved by a refusal of access, or by a failure to respond within the prescribed period, may within 21 days of the notice of refusal submit written representations to the Information Regulator. The requester may also apply to the High Court for relief within 180 days of the decision. Refer to section 3 of this manual for the Information Regulator's contact details.

12. Exercising Rights Under POPIA

In addition to PAIA requests, data subjects may exercise the following rights under POPIA, free of charge, via email, telephone, or in person at our physical address:

- Right of access: to request confirmation of whether the Company holds personal information about you and to receive a copy of that information
- Right to correction or deletion: to request correction or deletion of inaccurate, irrelevant, excessive, outdated, incomplete, misleading, or unlawfully obtained personal information
- Right to object: to object at any time to the processing of your personal information, including for direct marketing purposes
- Right to withdraw consent: to withdraw consent to processing at any time, without affecting the lawfulness of prior processing

Requests to exercise POPIA rights should be directed to the Information Officer at info@mpowerholdings.co.za or at our physical address. Where a request is made by telephone, the requester may be asked to confirm it in writing so that a proper record is maintained.

13. Availability of This Manual

This manual is made available as follows:

- On the Company's website at www.mpowerholdings.co.za, where it may be downloaded free of charge
- At the Company's principal place of business at 1 Amatole Street, N4 Gateway Industrial Park, Willow Park Manor X65, Pretoria 0184, Gauteng, South Africa, where it is available for inspection during normal business hours
- On request from the Information Officer at info@mpowerholdings.co.za, who will provide a copy free of charge

This manual will be reviewed and updated as required to reflect changes in the Company's operations or applicable legislation. This manual does not need to be submitted to the Information Regulator unless specifically requested.

MPOWER HOLDINGS (PTY) LTD with Reg No: 2011/104748/07

This PAIA Manual was last updated: 7 May 2026

Issued by:

Pieter Espach

Information Officer

MPOWER HOLDINGS (PTY) LTD

Annexure A

(J752 FORM — TO BE MERGED WITH FINAL PDF)

Annexure B

Prescribed Fee Schedule

Published under Government Gazette No. 23119, General Notice No. 187 of 15 February 2002 (as updated)

Request Fee

A request fee is payable before a PAIA request will be processed. No request fee is charged where the requester is seeking access to their own personal information.

Item	Fee (ZAR)
Request fee (all requesters other than personal requesters)	R140.00
Request fee for access to own personal information	No fee

Access Fees

An access fee is payable where a request is granted, to cover the cost of search, preparation, and reproduction of the record. The fee for search and preparation is R30.00 per hour or part thereof, excluding the first hour. The following reproduction fees apply:

Item	Fee (ZAR)
Photocopy of an A4-size page or part thereof	R1.80
Printed copy of an A4-size page or part thereof	R0.80
Compact disc (CD-ROM)	R200.00
Transcription of visual images, per A4-size page or part thereof	R50.00
Copy of visual images	R70.00
Transcription of audio record, per A4-size page or part thereof	R25.00
Copy of an audio record	R40.00
Postage (where record is posted to the requester)	R9.75

Note: Requesters who are unable to pay the applicable fees may apply for an exemption by stating the reason on the request form. The Information Officer will consider the application on its merits.