



PAIA Manual

Paladin Investment Management (Pty) Ltd

FSP Number 54625

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This PAIA Manual is published by Paladin Investment Management (Pty) Ltd ("Paladin") in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended). Date of compilation: 24 April 2026. Date of revision: 1 July 2026.

1. List of Acronyms and Abbreviations

Acronym	Definition
CEO	Chief Executive Officer
DIO	Deputy Information Officer
FSCA	Financial Sector Conduct Authority
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa

2. Purpose of PAIA Manual

This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by Paladin 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 the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the Company which are available in accordance with any other legislation;
- 2.4 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;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the Company processes 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;
- 2.7 know the recipients or categories of recipients to whom personal information may be supplied;
- 2.8 know if the Company 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
- 2.9 know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. Key Contact Details for Access to Information

3.1 Chief Information Officer

Field	Detail
Name	Gerhard Hanno Visagie
Title	Chief Executive Officer
Tel	087 148 6730
Email	gerhard@paladin.africa

3.2 Deputy Information Officer

Field	Detail
Name	N/A
Title	N/A
Tel	N/A
Email	N/A
Fax	N/A

3.3 Access to Information – General Contact

Field	Detail
Email	finance@paladin.africa

3.4 National / Head Office

Field	Detail
Postal Address	Unit 9 Time Square, 9 Elektron Road, Techno Park, Stellenbosch, 7600
Physical Address	Unit 9 Time Square, 9 Elektron Road, Techno Park, Stellenbosch, 7600
Telephone	087 148 6730
Email	info@paladin.africa
Website	paladin.africa

4. Guide on How to Use PAIA and How to Obtain Access to the Guide

4.1 The 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 the 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–
 - 4.3.2.1 the Information Officer of every public body, and
 - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3 the manner and form of a request for–
 - 4.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50⁴;
- 4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5 the assistance available from the 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–
 - 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and
 - 4.3.6.3 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;
- 4.3.7 the provisions of sections 14⁵ and 51⁶ 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 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

¹ Section 17(1) of PAIA - For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA - Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA - A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA - A requester must be given access to any record of a private body if (a) that record is required for the exercise or protection of any rights; (b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and (c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA - The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA - The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA - The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

⁸ Section 52(1) of PAIA - The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

4.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92¹¹.

5. Categories of Records Available Without a Formal Request

The following categories of records are available without a person having to submit a formal PAIA request:

Category of Records	Available on Website	Available upon Request
PAIA Manual	Yes	Yes
General company profile and overview	Yes	Yes
Fund factsheets and investment information (publicly available)		Yes
Regulatory licence and FSCA authorisation status	Yes	Yes

6. Records Available in Accordance with Other Legislation

The following records are created and maintained in accordance with applicable South African legislation:

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Compliance Records	Protection of Personal Information Act 4 of 2013
Financial Services Provider Licence	Financial Advisory and Intermediary Services Act 37 of 2002
Annual Financial Statements	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
FICA / AML Records	Financial Intelligence Centre Act 38 of 2001

⁹ Section 22(1) of PAIA - The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA - The information officer of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that the Minister may, by notice in the Gazette, make regulations regarding (a) any matter which is required or permitted by this Act to be prescribed; (b) any matter relating to the fees contemplated in sections 22 and 54; (c) any notice required by this Act; (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.

7. Subjects and Categories of Records Held

Paladin holds records on the following subjects:

Subject	Categories of Records
Corporate Governance	Memorandum of Incorporation, shareholder agreements, board resolutions, company registration documents, statutory returns
Finance & Accounting	Annual financial statements, management accounts, tax returns, VAT records, banking records, audit reports
Investment Management	Investment mandates, fund agreements, investor documentation, portfolio records, fund performance reports, side letters
Compliance & Regulatory	FSCA licence documentation, FICA compliance records, AML policies, compliance reports, KYC records
Human Resources	Employment contracts, payroll records, leave records, employee policies and procedures, BEE documentation
Legal	Contracts, service agreements, legal opinions, dispute records, insurance policies
Information Technology	IT policies, security protocols, software licences, data management records
Marketing & Communications	Marketing materials, investor presentations, fund factsheets, website content

8. Processing of Personal Information

8.1 Purpose of Processing Personal Information

Paladin processes personal information for the following purposes:

- 8.1.1 Managing investor relationships, including onboarding, KYC/AML due diligence, and investor reporting;
- 8.1.2 Fulfilling regulatory obligations under FICA, FSCA requirements, and POPIA;
- 8.1.3 Managing employment relationships, including recruitment, payroll, and HR administration;
- 8.1.4 Engaging with service providers and counterparties in connection with investment management activities;
- 8.1.5 Maintaining internal governance and compliance records; and
- 8.1.6 Providing fund management and consulting services to investee companies and partners.

8.2 Categories of Data Subjects and Personal Information Processed

Categories of Data Subjects	Personal Information that may be Processed
Investors / Clients	Full name, identity/passport number, address, contact details, tax number, bank details, source of funds, employment status, investment history

Categories of Data Subjects	Personal Information that may be Processed
Employees	Full name, identity number, address, contact details, qualifications, employment history, salary and payroll information, gender, race, banking details, disciplinary records
Service Providers / Counterparties	Company name, registration number, VAT number, address, contact person details, bank details, trade and professional credentials
Job Applicants	Full name, contact details, qualifications, employment history, identity number, references
Website Users	IP address, browser data, cookies, contact form submissions

8.3 Recipients or Categories of Recipients of Personal Information

Category of Personal Information	Recipients / Categories of Recipients
Identity and contact details (KYC/AML)	Financial Intelligence Centre (FIC), SARS, relevant regulatory authorities
Investor financial and identity records	Custodians (JP Morgan, RMB), fund administrators, auditors, legal advisors
Employee payroll and tax records	SARS, Department of Labour, pension fund administrators, medical aid providers
Qualifications and background verifications	South African Qualifications Authority (SAQA), background screening providers
Credit and payment history	Credit bureaus

8.4 Planned Transborder Flows of Personal Information

Paladin has operations in South Africa (Stellenbosch) and Rwanda (Kigali). As a result, certain personal information, particularly relating to investors in Paladin Africa Holdings Ltd domiciled in Rwanda, may be transferred to or processed in Rwanda. The Company will ensure that adequate data protection safeguards are in place for any transborder transfer, in accordance with section 72 of POPIA. Personal information may also be stored on cloud-based systems whose servers may be located outside the Republic of South Africa. The Company will ensure appropriate contractual and technical safeguards apply to such transfers.

8.5 Information Security Measures

Paladin implements the following security measures to ensure the confidentiality, integrity, and availability of personal information:

- 8.5.1 Data encryption for electronic records and communications;
- 8.5.2 Secure, password-protected access controls with role-based permissions;
- 8.5.3 Antivirus and anti-malware solutions on all company devices;
- 8.5.4 Regular data backups and secure offsite/cloud storage;
- 8.5.5 Confidentiality agreements with employees and service providers;
- 8.5.6 Physical security controls at office premises; and
- 8.5.7 Ongoing staff training on data protection and information security obligations.

9. Availability of the Manual

A copy of this Manual is available:

- 9.1 on the Paladin Africa website at paladin.africa;
- 9.2 at the head office of Paladin in Stellenbosch, South Africa, for public inspection during normal business hours;
- 9.3 to any person upon request and upon payment of a reasonable prescribed fee; and
- 9.4 to the Information Regulator upon request.

10. Updating of the Manual

The head of Paladin will on a regular basis update this Manual to ensure it remains accurate and compliant with any legislative changes.

Issued by:

Gerhard Hanno Visagie
Chief Executive Officer
Paladin Investment Management (Pty) Ltd

Date: 1 July 2026