



# EOH Promotion of Access to Information Act (“PAIA”) Manual

UNLOCKING THE CODE TO GOVERNANCE, RISK AND COMPLIANCE

Policy Owner	Group Information Officer
Policy Custodian	Head of Compliance
Approved by	EOH Board of Directors
Approval/Effective date	June 2021
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## Abbreviations

ACRONYM	STANDS FOR
EOH	EOH Holdings Limited and all of its subsidiaries
EXCO	EOH Executive Committee
EME	Exempted Micro Enterprise
MA	Master Agreement
QSE	Qualifying Small Enterprise

## 1. Right of Access to Information

### 1.1. Introduction

1.1.1. The 1996 South African Constitution, by providing a statutory right of access on request to any record held by the state as well as access to records held by private bodies, entrenches the fundamental right to information.

The Promotion of Access to Information Act 2 of 2000 (“the Act”), which came into effect on 9 March 2001, seeks to advance the values of transparency and accountability in South Africa and provides the mechanism for requesters to exercise and protect their constitutional right to request access to a record.

1.1.2. The Act establishes the following statutory rights of requesters to any record of a private body if:

- That record is required for the exercise or protection of any of his or her legal rights;
- That requester complies with all the procedural requirements; and
- Access is not refused in terms of any ground referred to in the Act.

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In terms of the Act private bodies are required to publish a manual to assist requesters who wish to request access to a record.

1.2. Availability of the EOH PAIA Manual and Entry Point for requests

1.2.1. This document serves as the EOH manual (“the Manual”) in accordance with the requirements of section 51 of the Act to facilitate access to records held by EOH. A copy of this Manual is available to the public in a PDF (“Portable Document Format”) version on the website of EOH at [www.eoh.co.za](http://www.eoh.co.za) or on request from the Information Officer referred to in this Manual. EOH endorses the spirit of the Act and believes that this Manual will assist requesters in exercising their rights.

1.2.2. In summary, the Manual provides information on the:

- Contact details of the Information Officer;
- Structure and functions of EOH;
- Subjects and categories of records that are held by EOH; and
- Procedure that needs to be followed and criteria that have to be met by a requester to request access to a record

1.3. Who may request access to information:

1.3.1. The Act provides that a requester is only entitled to access to a record if the record is required for the exercise or protection of a right. Only requests for access to a record, where the requester has satisfied the Information Officer that the record is required to exercise or protect a right, will be considered. A requester may act in different capacities in making a request for a record. This will influence the amount to be charged when a request has been lodged.

1.3.2. Requesters may make a request as:

- A personal requester who requests a record about him/herself;
- An agent requester who requests a record on behalf of someone else with that person’s consent and where it is required for the protection of that person’s legal right;
- A third-party requester who requests a record about someone else with that person’s consent and where it is required for the protection of that person’s legal right; and

A public body who may request a record if:

- It fulfills the requirements of procedural compliance;
- The record is required for the exercise or protection of a right; and
- No grounds for refusal exist.

1.4. Contact Details of EOH Information Officer: Sec 51 (1) (a)

1.4.1. The Chief Executive Officer of EOH has delegated his powers to the Information Officer below in Terms of the Act to handle all requests on EOH’s behalf and ensure that the requirements of the Act are administered in a fair, objective and unbiased manner.

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## EOH contact details

Group Information Officer: Zanele Mazibuko  
Information Coordinator: Garreth Young

Physical Address: Postal Address:  
Block D, EOH Business Park, PO BOX 59  
Gillooly's View BRUMA  
1 Osborne Lane 2026  
Bedfordview, 2008

Tel: +27 (0) 11 607 8100 Fax: +27 (0) 11 616 9929  
E-mail: [privacy@eoh.com](mailto:privacy@eoh.com) E-mail: [Garreth.Young@eoh.com](mailto:Garreth.Young@eoh.com)  
[Zanele.Mazibuko@eoh.com](mailto:Zanele.Mazibuko@eoh.com)

- 1.5. Policy with regard to Confidentiality and Access to Information:
- 1.5.1. EOH will protect the confidentiality of information provided to it by third parties, subject to EOH's obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information. If access is requested to a record that contains information about a third party, EOH is obliged to attempt to contact this third party to inform them of the request.
- 1.5.2. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted, or not.
- 1.6. Information Regulator guidance to Requesters on how to use the Act: *Sec 51 (1) (b)*

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. This guide can be found on the information regulator website in all 11 official languages; <https://infoeregulator.org.za/paia-guidelines/>

Information Regulator

The Information Regulator of South Africa is based at:

Postal Address: P O Box 31533  
Braamfontein  
Johannesburg  
2017

Physical Address: JD house  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2001

General enquiries: [enquiries@infoeregulator.org.za](mailto:enquiries@infoeregulator.org.za)

Complaints: [POPIAComplaints@infoeregulator.org.za](mailto:POPIAComplaints@infoeregulator.org.za); and  
[PAIAComplaints@infoeregulator.org.za](mailto:PAIAComplaints@infoeregulator.org.za)

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## 2. EOH Group Structure

### 2.1. Scope

2.1.1. This Manual has been prepared in respect of the EOH Group of Companies, which includes related entities and / or wholly owned subsidiaries as reflected in Annexure A.

2.1.2. The scope of this Manual will exclude EOH's operations outside South Africa and will serve to provide a reference regarding the records held by EOH at its Registered Office and various operations.

### 2.2. EOH Group of Companies Profile and Structure

2.2.1. EOH is the largest implementer of enterprise applications and has a wide range of Outsourcing, Cloud, Managed Services, Industrial Technologies and Business Process Outsourcing ('BPO') solutions.

2.2.2. EOH's purpose is to provide the technology, knowledge, skills and organizational ability critical to Africa's development and growth; and to be an ethical and relevant force for good and to play a positive role in society, beyond normal business practice.

2.2.3. EOH's operating model is two dimensional, focused on key business areas and industry verticals. EOH offers solutions across the spectrum through a simple 'Design, Build and Operate' approach and is able to offer its customers tailored, flexible and robust solutions.

2.2.4. EOH's key business areas are Applications, IT Management, IT outsourcing, Industrial Technologies and Business Process Outsourcing (BPO). A key differentiator in our model is the specialist industry expertise that we provide through our industry verticals. In this way, EOH provides high value, end-to-end solutions across the spectrum and consistently delivers value to clients through its deep industry expertise, an understanding of clients' business and a 'Right 1<sup>st</sup> Time' approach to delivery.

## 3. Classes of Records

### 3.1. Automatic Disclosure: Sec 51 (1) (c) – Records automatically available to the Public

3.1.1. No notice has been published in terms of section 52 of the Act. However, the following records are automatically available at the registered office of EOH on payment of the prescribed fee for reproduction.

- Documentation and information relating to EOH which is held by the Companies and Intellectual
- Properties Commission in accordance with the requirements set out in set out in section 25 of the Companies Act 71 of 2008.
- Product and Promotional Brochures
- News and other Marketing Information
- The annual integrated report and any other shareholder communications as published on EOH's website.

### 3.2. Legislative requirements: Sec 51 (1) (d) – Records available in accordance with other legislation

3.2.1. Records are kept in accordance with such other legislation as applicable to the EOH Group, which includes, but is not limited to:

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- Banks Act 94 of 1990
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Civil Proceedings Evidence Act, 1965 (Act 25 of 1965)
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of South Africa Act 108 of 1996
- Copyright Act 98 of 1987
- Consumer Protection Act 68 of 2008
- Criminal Procedure Act 51 of 1977
- Customs and Excise Act, 1964
- Deeds Registries Act 57 of 1937
- Debt Collectors Act 114 of 1998
- Electronic Communications and Trans-actions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Finance Act 2 of 2007
- Firearms Control Act 60 of 2000;
- Income Tax Act 58 of 1962
- Insider Trading Act 135 of 1998
- Insolvency Act 24 of 1936
- Labour Relations Act 66 of 1995
- Long Term Insurance Act 52 of 1998
- Magistrates Court Act 32 of 1944
- Non Profit Organisations Act 71 of 1997
- Occupational Health and Safety Act 85 of 1993
- Patents Act 57 of 1987
- Pension Funds Act 24 of 1956
- Prevention of Organised Crime Act 14 of 1998
- Protection of Information Act, No. 84 of 1982
- Regulation of Interception of Communications and Provision of Communication Related Information Act 70 of 2002
- Securities Services Act 36 of 2004
- Short Term Insurance Act. 53 of 1998
- Skills Development Act 97 of 1998
- Skills Development Levies Act 97 of 1999
- South African Revenue Service Act 34 of 1997
- Statistics Act 6 of 1999
- Tax on Retirement Funds Act No 38 of 1996
- Trust Property Control Act 57 of 1988
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

Although EOH has used its best endeavours to supply you with a list of applicable legislation it is possible that the above list may be incomplete.

Wherever it comes to EOH's attention that existing or new legislation allows a requester access on a basis other than that set out in the Act, we shall update the list accordingly.

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### 3.3. Records held by EOH Group: Sec 51 (1) (e) – EOH Record Subjects and Categories

#### 3.3.1 Corporate Affairs and Investor Relations / Communications

1. Media Releases
2. Newsletters and Publications
3. Corporate Social Investment
4. Public Corporate Records
5. SENS releases

#### 3.3.2. Corporate Secretariat and Governance

- Applicable Statutory Documents
- Annual Reports
- Board of Directors and Board Committee Terms of Reference
- Codes of Conduct
- Executive Committee Meeting Minutes
- Legal Compliance Records
- Memoranda of Incorporation
- Minutes of Board of Directors and Board Committee Meetings
- Minutes of Shareholders' Meetings
- Group Policies and Procedures
- Share Certificates
- Shareholder Agreements
- Share Registers (EOH's official share register is however maintained by its transfer secretary)
- Strategic plans
- Statutory Returns to Relevant Authorities

#### 3.3.3 Finance and Taxation

- Policies and Procedures
- Accounting Records
- Annual Financial Statements
- Audit Reports
- Capital Expenditure Records
- Investment Records
- Invoices and Statements
- Management Reports
- Purchasing Records
- Sale and Supply Records
- Tax Records and Returns
- Treasury Dealing
- Transactional Records

#### 3.3.4 Human Resources

- Education and Training Records
- Employee Benefit Records
- Employment Contracts

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- Employment Equity Records
- Employee Information
- Employee Share Option Scheme
- Policies and Procedures
- Group Life
- Leave Records
- Medical Records
- Pension and Retirement Funding Records
- Study assistance scheme/s
- Tax Returns of employees
- UIF Returns

### 3.3.5 Information Technology

- Agreements
- Disaster Recovery
- Hardware and Software Packages
- Policies and Procedures
- Internal Systems Support and Programming
- Licenses
- Operating Systems

### 3.3.6 Intellectual Property

- Trademark applications
- Agreements relating to intellectual property
- Copyrights

### 3.3.7 Legal

- Complaints, pleadings, briefs and other documents pertaining to any actual or pending litigation, arbitration or investigation
- Material licenses, permits and authorizations

### 3.3.8 Sales, Marketing and Communication

- Brochures, Newsletters and Advertising Material
- Client Information
- Marketing Brochures
- Marketing Strategies
- Product Brochures
- Policies and Procedures

## 4. Access Procedure and Requests

The purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to a record held by EOH.

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It is important to note that an application for access to information can be refused in the event that the application does not comply with the procedural requirements of the Act. In addition, the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 Chapter 4 of the Act.

If it is reasonably suspected that the requester has obtained access to the EOH Group’s records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

4.1. Guidance on Completion of Prescribed Access Form: Sec 51 (1) (e)

4.1.1. In order for EOH to facilitate your access to a record you need to complete the attached prescribed access form attached as Annexure B. Please take note that the prescribed access form must be completed in full, failure to do so will result in the process being delayed until such additional information is provided. EOH will not be held liable for delays due to receipt of incomplete forms. Due cognisance should be taken of the following instructions when completing the Access Request Form because the Information Officer shall not process any request for access to a record until satisfied that all requirements have been met:

1. The Access Request Form must be completed in the English language.
2. Proof of identity is required to authenticate the requester’s identify. If the requester acts as an agent requester, the requester shall provide proof of the identity of the person on whose behalf the request is made, the authority or mandate given to the requester by such person and proof of the identity of the requester as provided above.
3. Type or print in BLOCK LETTERS an answer to every question.
4. If a question does not apply, state “N/A” in response to that question.
5. If there is nothing to disclose in reply to a particular question, state “nil” in response to that question.
6. If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional attached folio.
7. When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

4.2. Submission of Prescribed Access Form

4.2.1. The completed Access Request Form must be submitted either via conventional mail, e-mail or fax and must be addressed to the Information Officer.

4.3. Payment of Prescribed Fees

4.3.1. Payment details can be obtained from the Information Officer and payment can be made either via a direct deposit, by bank guaranteed cheque or by postal order (no credit card payments are accepted). Proof of payment must be supplied. Four types of fees are provided for in terms of the Act:

- **Request fee:** An initial, non-refundable R57.00 (incl. VAT) is payable on submission. This fee is not applicable to Personal Requesters, referring to any person seeking access to records that contain their personal information.
- **Reproduction fee:** This fee is payable with respect to all records that are automatically available.
- **Access fee:** If the request for access is successful an access fee may be required to re-imburse EOH for the costs involved in the search, reproduction and/or preparation of the record and will be calculated based on the Prescribed Fees.

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- **Deposit:** A deposit of one third (1/3) of the amount of the applicable access fee, is payable if EOH receives a request for access to information held on a person other than the requester himself/herself and the preparation for the record will take more than six (6) hours. In the event that access is refused to the requested record, the full deposit will be refunded to the requester.

#### 4.4 Notification

4.4.1. EOH will within thirty (30) days of receipt of the request decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

4.4.2. The thirty (30) day period within which EOH has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty (30) days, if the request is for a large volume of information, or the request requires a search for information held at another office of EOH and the information cannot be reasonably be obtained within the original thirty (30) day period. EOH will notify the requester in writer should an extension be sought.

4.4.3. If the request for access to a record is **successful**, the requester will be notified of the following:

- The amount of the access fee payable upon gaining access to the record;
- An indication of the form in which the access will be granted; and
- Notice that the requester may lodge an application with a court against the payment of the access fee and the procedure, including the period, for lodging the application.
- If the request for access to a record is **not successful**, the requester will be notified of the following:
- Adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal); and
- That the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

#### 4.5 Records that cannot be found or do not exist

If EOH has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

## 5. Grounds for refusal of access to records and appeal

### 5.1 Grounds for Refusal Chapter 4

The thirty (30) day period within which the Information Officer is required to reply to a request, as stipulated in the Act, shall commence only once a requester has complied with all the requirements of the Act in requesting access to a record, to the satisfaction of the Information Officer.

5.1.1. Requests may be refused on the following grounds, as set out in the Act:

- Mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of commercial information of a third party or EOH, if the record contains:
  - Trade secrets of the third party or EOH;

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- Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or EOH; and
- Information disclosed in confidence by a third party to EOH if the disclosure could put that third party to a disadvantage or commercial competition.
- Mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement;
- Mandatory protection of the safety of individuals, and the protection of property;
- Mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and
- Mandatory protection of research information of a third party and of EOH.

## 5.2. Appeal

5.2.1. If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the requester may, within thirty (30) days of notification of the Information Officer's decision, apply to court for appropriate relief.

## 6. Prescribed Fees: *Sec 92*

### 6.1 Reproduction Fees

The applicable fees (excluding VAT) for reproduction as referred to above are:

Category	Rand
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic form	0.75
For a copy in a computer readable form: Compact disc	70.00
A transcription of visual images, for an A4-size page or part thereof	40.00
i. For a copy of visual images	60.00
ii. A transcription of an audio record, for an A4-size page or part thereof	20.00
iii. For a copy of an audio record	30.00

### 6.2. Request Fee

A request fee of R50.00 (excluding VAT) is payable upfront where a requester submits a request for access to information on anybody else other than a requestor.

### 6.3. Access Fee

The applicable fees (excluding VAT) which will be payable are:

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Category	Rand
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic form	0.75
For a copy in a computer readable form: Compact disc	70.00
A transcription of visual images, for an A4-size page or part thereof	40.00
For a copy of visual images	60.00
A transcription of an audio record, for an A4-size page or part thereof	20.00
For a copy of an audio record	30.00

#### 6.4. Postage Fee

Where a copy of the record needs to be posted the actual postal fee is payable in addition to the applicable fees.

## 7. Sharing of Personal Information

### 7.1. EOH may share personal information with:

- Other companies forming part of the EOH group of companies located outside of South Africa;
- Services providers who perform services on behalf of the EOH Group; and
- Third party suppliers

### 7.2. EOH Security measures to protect personal information with:

7.2.1. EOH takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect to protect personal information. EOH has internal policies and controls in place to ensure that you data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

7.2.2. EOH will take steps to ensure that third party providers who process personal information on behalf of EOH apply adequate safeguards as required in terms POPIA.

### 7.3. Transborder Flows of Personal Information

7.3.1. EOH may from time to time transfer personal information to another country for the purposes of rendering services to employees and customers. EOH will take the necessary steps to ensure that services providers and

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third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

#### 7.4. Purpose of Processing of Personal Information

7.4.1 EOH processes Personal Information which includes but it is not limited to the following purposes:

- Rendering of services to our customers
- Employee administration
- Providing or managing any information on products
- Transacting with our suppliers
- Maintaining customer records
- Recruitment purposes
- Apprenticeship and bursary purposes
- Travel purposes
- General administration
- Financial and tax purposes
- Legal purposes
- Health and safety purposes
- Visitor access monitoring purposes
- Managing the premises and facilities
- Investigating of and preventing fraud
- Debt recovery and responding to website enquires

#### 7.5 Types of Personal Information

Categories individuals and juristic entities	Categories of personal information held	Availability
Employees	<ul style="list-style-type: none"> <li>• ID number</li> <li>• Contact details</li> <li>• Physical and postal address</li> <li>• Date of birth</li> <li>• Age</li> <li>• Disability</li> <li>• Information</li> <li>• Employment history</li> <li>• Criminal/background checks</li> <li>• Fingerprints</li> <li>• CVs</li> <li>• Education history</li> <li>• Banking details</li> </ul>	Not automatically available

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	<ul style="list-style-type: none"> <li>• Income tax reference number</li> <li>• Remuneration and benefit information (including medical aid, pension/provident fund information)</li> <li>• Details related to employee performance</li> <li>• Disciplinary procedures</li> <li>• Employee disability information</li> <li>• Employee pension and provident fund information</li> <li>• Employee contracts</li> <li>• Employee performance records</li> <li>• Physical access records</li> <li>• CCTV records</li> <li>• Health and safety records</li> <li>• Time and attendance records</li> </ul>	
Suppliers/Service Providers	<ul style="list-style-type: none"> <li>• Entity name</li> <li>• registration number</li> <li>• income tax number</li> <li>• contact details for representative persons</li> <li>• FICA documentation</li> <li>• BBB-EE certificates</li> <li>• Invoices</li> <li>• Contractual documentation</li> </ul>	Not automatically available
Directors and Shareholders	<ul style="list-style-type: none"> <li>• Name</li> <li>• Surname</li> <li>• ID numbers</li> <li>• Financial information as required for statutory reporting</li> </ul>	Not automatically available
New Job Applicants	<ul style="list-style-type: none"> <li>• Name</li> <li>• Surname</li> <li>• Address</li> <li>• Contact details</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Details of qualifications</li> </ul>	Not automatically available

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	<ul style="list-style-type: none"> <li>• Skills</li> <li>• Experiences and employment history</li> <li>• Information about your current level of remuneration, including benefit entitlements, whether or not you have a disability for which EOH needs to make reasonable adjustments during the recruitment process, and information about your entitlement to work in South Africa</li> </ul>	
Website Visitors	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Company name</li> <li>• Job title and telephone number</li> </ul>	
Visitors	<ul style="list-style-type: none"> <li>• Physical access records</li> <li>• Electronic access records scans</li> <li>• CCTV records</li> </ul>	Not automatically available
Children	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address and contact details</li> <li>• Birth certificates</li> <li>• Age</li> <li>• Child medical information</li> </ul>	Not automatically available

**Annexure A:**  
**EOH 000 ICT FRM 05**  
**PAIA REQUEST FOR ACCESS TO RECORD FORM v1.0 2015**



**REQUEST FOR ACCESS TO A RECORD IN TERMS OF SEC 53(1) of the PROMOTION OF ACCESS TO INFORMATION ACT 2 of 2000**

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1. Particulars of Private Body requesting access to the record

<b>Contact details:</b>	
Chief Executive Officer (as defined in the Act)	
Information Officer	
Postal address	
Physical address	
Phone number	
Fax number	
E-mail address	
Website address	

2. Particulars of an individual person requesting access to the record

- The particulars of the person who requests access to the record must be recorded below.
- Furnish an address and/or fax number in the Republic of South Africa to which information must be sent.
- Proof of identity is required from both the requester and any person or any party acting on behalf of the requester. The original identity document or such other proof satisfactory to the Chief Executive Officer or Information Officer will need to be presented with this request by the requester or the requester's representative before the request will be processed.
- If the request is made on behalf of another person, proof of the capacity in which the request is made, is also to be presented with this request

DETAILS OF REQUESTER

Surname	
Full names	
Identity number	
Postal address	
Telephone number	
Fax number	
E-mail address	

If a request is made on behalf of another person the requester is obliged to identify him / herself and to provide proof of the mandate under which the request is made, to the satisfaction of the Information Officer.

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3. Particulars of person on whose behalf request is made

Surname	
Name	
Identity number	

4. Particulars of record

- Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.
- The requester’s attention is drawn to the grounds on which the private body must or may refuse access to a record (in certain instances this may be mandatory, in others it may be discretionary):
  - Mandatory protection of the privacy of a third party who is a natural person (human being);
  - Mandatory protection of certain confidential information of a third party;
  - Mandatory protection of commercial information of third party;
  - Mandatory protection of the safety of individuals, and the protection of property;
  - Mandatory protection of records privileged from production in legal proceedings;
  - Commercial information of a private body;
  - Mandatory protection of research information of a third party and a private body.

DESCRIPTION OF RECORD AND/OR PART OF RECORD

Category	Description of record

Notes to Particular of record:

- Your indication as to the required form of access depends on the form in which the record is available.
- Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

<i>Mark the appropriate box with an "X".</i>			
<b>1. If the record is in written or printed form -</b>			
copy of record*		inspection of record	
<b>2. If record consists of visual images -</b> (This includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			

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view the images		copy of the images*		transcription of the images*	
<b>If the record consists of recorded words or information which can be reproduced in sound -</b>					
listen to the soundtrack (audio cassette)				transcription of soundtrack* (written or printed document)	
<b>If the record is held on computer or in an electronic or machine-readable form -</b>					
printed copy of record*		printed copy of information derived		copy in computer readable format*	
Do you wish the copy or transcription to be posted to you? <b>Note:</b> If you requested a copy or transcription of a record (above), a postal fee is payable.				<i>Yes</i>	<i>No</i>

5. Fees

- A request for access to a record, other than record containing personal information about yourself, will be processed only after a request fee (**currently R50.00**) has been paid.
- If the prescribed request fee is amended, you will be notified of the amount required to be paid as the request fee.
- The **fee payable for access** to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- If you qualify for exemption of the payment of any fee, please state the reason, therefore.

<b>The requester qualifies for an exemption in payment of fees</b> (mark the appropriate box)		<i>Yes</i>	<i>No</i>
<b>Reason</b>			

6. Form of access to record

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*If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.*

Disability:	
Form in which record is required?	

7. Details of the right to be exercised and/or protected.

Indicate which right is to be exercised or protected \*


Explain why the requested record is required for the exercising or protection of the aforementioned right \*


\* NOTE:

If the provided space is inadequate please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

8. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

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9. Signatures

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF REQUESTER

(sign & print name)

\_\_\_\_\_  
SIGNATURE OF REPRESENTATIVE

(sign & print name)

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**Annexure A:**  
**EOH 000 GRC LST 09**  
**List of Subsidiaries as at 23 August 2021**

Please refer to the Integrated Annual Report Notes to the Financial Statements, Note 40.

EOH Holdings Ltd 1998/014669/06

EOH Mthombo  
 EOH Abantu  
 IOCO Software Distribution (Pty) Ltd  
 EOH International (Pty) Ltd  
 NEXTEC Industrial Technologies (Pty) Ltd  
 CA Southern Africa (Pty) Ltd  
 Intellient (Pty) Ltd  
 Siyanqoba Seminars (Pty) Ltd  
 EOH Consulting (Pty) Ltd  
 EOH Treasury (Pty) Ltd  
 EOH Enterprise Development Trust  
 iOCO Solutions GmbH  
 iOCO Solutions (UK) Ltd  
 Hlanganani Blick (Pty) Ltd

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Equinext (Pty) Ltd  
 Highveld PFS ado EOH Abantu (Pty) Ltd  
 Highveld Wealth Management (Pty) Ltd  
 Rosstone Consulting (Pty) Ltd  
 Amber Moon Trading 5 (Pty) Ltd  
 Blick Properties (Pty) Ltd  
 CSO Employee Benefit Services (Pty) Ltd  
 Inlexso (Pty) Ltd  
 EOH Technology Solutions ado EOH Mthombo  
 SULT (Pty) Ltd  
 EOH Managed Services PS (Pty) Ltd  
 EOH Network Solutions or Africa INX ado EOH Mthombo  
 LMM ado EOH Abantu (Pty) Ltd  
 NEXTEC Security and Building Technologies (Pty) Ltd  
 Medical Services Organisation SA (Pty) Ltd  
 Faculty Training Institute (Pty) Ltd  
 iOCO Digital (Pty) Ltd  
 Freethinking Business Consulting (Pty) Ltd  
 Proserv Tourism South Africa (Pty) Ltd  
 Hospitality Professionals South Africa (Pty) Ltd  
 HR Professional Resources (Pty) Ltd  
 EOH Mthombo Mozambique (Pty) Ltd  
 ITS Technologies (Pty) Ltd  
 MPC Recruitment (Pty) Ltd  
 Educos Vision Services SARL (Luxembourg)  
 GLS Consulting (Pty) Ltd  
 GLS Software (Pty) Ltd  
 IMQS Software (Pty) Ltd  
 Energy Cybernetics (Pty) Ltd  
 Veritek (Pty) Ltd  
 Quinedge (Pty) Ltd  
 Educos Vision SARL (Luxembourg)  
 Energy Insight (Pty) Ltd  
 Regro Technology (Pty) Ltd  
 Coastal and Environmental Services (Pty) Ltd  
 CES Mozambique Limitada  
 Ashreq Environmental & Occupational Hygiene Consultants (Pty) Ltd  
 Compu-Power (Pty) Ltd  
 Umbane Systems (Pty) Ltd  
 Cybercare (Pty) Ltd  
 Cortez Trading (Pty) Ltd  
 Dihlase Consulting Engineers (Pty) Ltd  
 Impact Human Resources (Pty) Ltd  
 Prehab Testing (Pty) Ltd  
 MANXiT (Pty) Ltd  
 e-business Systems Ltd (EBS)  
 Trackstar Trading 308 (Pty) Ltd T/A MES Africa  
 Shandon Business Solutions (Pty) Ltd

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XI Data Services (Pty) Ltd  
 Exigo Sustainability (Pty) Ltd  
 Deixis (Pty) Ltd  
 About Time Software (Pty) Ltd  
 EOH SEAL Ltd  
 XTND (Pty) Ltd  
 Scientia Optimate Financial Services (Pty) Ltd  
 EMID (Pty) Ltd  
 2Identify (Pty) Ltd  
 SORTIT (Pty) Ltd  
 Intelligens IT Solutions (Pty) Ltd  
 Hymax SA (Pty) Ltd  
 Hymax Talking Solutions (Pty) Ltd  
 Tintswalo Training (Pty) Ltd  
 Industrial Logistic Systems  
 Symplexity (Pty) Ltd  
 8 Bit Platoon (Pty) Ltd  
 In The Cloud Internet Services (Pty) Ltd  
 Digital Industries  
 Siyaya Skills Insitute (Pty) Ltd  
 Sabela Learning Academy (Pty) Ltd  
 Zusiza (Pty) Ltd  
 Rinedata SA (Pty) Ltd  
 Virtuoso Consulting  
 JOAT Consulting (Pty) Ltd  
 JOAT Sales & Services (Pty) Ltd  
 JOAT Sales & Services EC (Pty) Ltd  
 JOAT Sales & Services GP (Pty) Ltd  
 EOH Linkstate Services (Pty) Ltd  
 Apronics (Pty) Ltd  
 EOH Middle East FZ-LLC  
 Arcserve Southern Africa (Pty) Ltd  
 SCAN RF Projects (Pty) Ltd  
 Asset Technology Group (Egypt)  
 Cornastone Enterprise Management Systems (Pty) Ltd  
 Allos Consulting (Pty) Ltd  
 MBAT  
 Integrators of Systems Technology (Pty) Ltd  
 nuvoteQ (Pty) Ltd  
 Mondia Tech FZ-LLC  
 Cornastone Enterprise Systems (Pty) Ltd  
 Cornastone Managed Services (Pty) Ltd  
 Cornastone Enterprise Services (Pty) Ltd  
 Cornastone Telecommunications (Pty) Ltd  
 EOH Information Technology Namibia  
 EOH Singapore Pvt Ltd  
 Fluent Pay  
 Asset - Saudi Arabia

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Asset Gulf FZ LLC  
 Asset Arabia Software Systems LLC  
 Enerclever  
 XTND ado EOH Abantu  
 Nextep (Italy)  
 Zero12 (Italy)  
 Impression Signatures (Pty) Ltd  
 iOCO s.r.o.  
 NEXTEC Holdings (Pty) Ltd  
 Matipart (Pty) Ltd  
 NEXTEC Industrial Technologies Kenya Limited  
 Lizusize (Pty) Ltd  
 EOH Share Trust  
 EOH Mthombo Share Trust  
 EOH Holdings Limited  
 EOH Group of Companies  
 Xpert Decision Systems (Pty) Ltd  
 Managed Integrity Evaluation (Pty) Ltd  
 ZenAptix (Pty) Ltd  
 Employers Mutual Protection Services (Pty) Ltd  
 Sizabantu Background Checks (Pty) Ltd  
 HTCSA  
 BC Skills SARL  
 EOH Rwanda (Pty) Ltd  
 EOH Senior Holdco (Pty) Ltd  
 EOH Intermediate Holdco (Pty) Ltd

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