

WELLTEC GROUP PAIA MANUAL

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

Signed by: Chairman of Group Board

Johan Jonck

Johan Jonck (May 6, 2026 12:14:15 GMT+2)

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INFORMATION MANUAL FOR WELLTEC GROUP

Prepared in terms of Section 51 of the Promotion of Information Act 2 of 2000 (As Amended)

1. INTRODUCTION

The Promotion of Access to Information Act, no 2 of 2000 as amended through the Promotion of Access to Information Amendment Act 31 of 2019 ("the Act") gives effect to the constitutional right of access to any information in records held by public (government) or private (non-government) bodies that is required for the exercise of protection of any rights. Where a valid request is made in terms of the Act, Welltec Group is obliged to release the information, except where the Act expressly provides that the information may or must not be released.

1.1 The Constitution of the Republic of South Africa, 1996

Section 14 of the Constitution of the Republic of South Africa, 1996, provides the right to privacy. POPIA gives effect to the constitutional right to privacy provided in section 14 of the Constitution: -

- i) By safeguarding a person's personal information when processed by public and private bodies.
- ii) In a manner which balances the right to privacy with any other rights, including the rights in the Bill of Rights in Chapter 2 of the Constitution, particularly the right to access information; and
- iii) Subject to justifiable limitations, including but not limited to effective, efficient, and good governance and the free flow of personal information, particularly trans-border transfers.

Section 9 of PAIA recognises that the right of access to information is subject to certain justifiable limitations aimed at, amongst others:

- a) the reasonable protection of privacy.
- b) commercial confidentiality; and
- c) effective, efficient, and good governance.

1.2 The Protection of personal Information Act 4 of 2013

Section 55(2) of POPIA requires the Welltec Group and its subsidiaries to register its Information Officers and Deputy Information Officers with the Regulator before taking up their respective duties in terms of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) and the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

Regulation 4 (1) (c) of the POPIA Regulations confirms the publication requirement of PAIA when it stipulates that “...a manual is developed, monitored, maintained and made available as prescribed in sections 14 and 15 of PAIA.” The requirement for a manual is then extended to include POPIA requirements when section 17 of POPIA provides that a “...responsible party must maintain the documentation of all processing operations under its responsibility as referred to in section 14 or 51 of the Promotion of Access to Information Act”.

2. LIST OF ACRONYMS AND ABBREVIATIONS

2.1	“CEO”	Chief Executive Officer
2.2	“Data Subject” relates	A data subject is a person to whom Personal Information
2.3	“DIO”	Deputy Information Officer;
2.4	“IO”	Information Officer; means the person that is responsible for discharging the duties and responsibilities assigned to the head of the private institution, such as the Managing director or any person duly appointed by the MD;
2.5	“Minister”	Minister of Justice and Correctional Services;
2.6	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended);
2.7	“POPIA”	Protection of Personal Information Act No.4 of 2013;
2.8	“Regulator”	Information Regulator; and
2.9	“Republic”	Republic of South Africa
2.10	Welltec Group	refers to Welltec Group (Pty) Ltd with registration number 2020/697030/07
2.11	Other Requester	means any person making a request for access to a record
2.12	Third Party	means any natural or juristic person other than, the requester, a party that acting on behalf of the requester, or alternatively Welltec Group itself.

3. PURPOSE OF PAIA MANUAL

The purpose of this manual is to provide assurance to the regulator and the public on the processes at Welltec Group Ltd and its subsidiaries to avail information to requesters, and that Welltec Group complies with the requirements of both PAIA and POPIA.

The manual is useful to the public to:

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3 know the description of the records of the body which are available in accordance with any other legislation;
- 3.4 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;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if the body will process 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;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 know if the body 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
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

It is important to note that the Act recognizes certain limitations to the right of access to information, including, but not limited to limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution of the Republic of South Africa.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF WELLTEC GROUP & ITS SUBSIDIARIES

The CEO of Welltec Group has authorised the Welltec Group Head of Legal, Risk and Compliance as the Chief Information officer for the Welltec Group.

4.1 Chief Information Officer

Name: Thandokuhle Buthelezi
Tel: 073 798 7884 / 012 111 1611
Email: compliance@welltec.co.za/thandokuhle@welltec.co.za
Street address: Nr 47, Twenty First Street, Menlo Park, Pretoria, Gauteng 0081
Website address: WWW.WELLTEC.CO.ZA

4.2 Deputy Information Officers *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Bennie van Rooy
Tel: +27 12 111 1611/083 3800672
Email: bennie@welltec.co.za
Street address: Nr 47, Twenty First Street, Menlo Park, Pretoria, Gauteng 0081
Website address: WWW.WELLTEC.CO.ZA

Name: Ilze Humphreys
Tel: +27 12 111 1611/ 082 5602827
Email: ilze@welltec.co.za
Street address: Nr 47, Twenty First Street, Menlo Park, Pretoria, Gauteng 0081
Website address: WWW.WELLTEC.CO.ZA

4.3 Access to information general contacts

Email: COMPLIANCE@WELLTEC.CO.ZA

4.4 National or Head Office

Tel: +27 12 111 1611
Email: COMPLIANCE@WELLTEC.CO.ZA
Street address: Nr 47, Twenty First Street, Menlo Park, Pretoria, Gauteng 0081
Website address: WWW.WELLTEC.CO.ZA

4.5 The Information Regulator of South Africa

The Information Regulator is required in terms of the Act to compile a guide in every official language, in an easily comprehensible form and manner, as may be required by a person who wishes to exercise any right contemplated in the Act.

Any enquiries regarding this guide should be directed to:

Postal Address: The Information Regulator (South Africa)

PO Box 31533

Braamfontein

2017

Telephone Number: +27 10 023 5200

Email Addresses

General enquiries: enquiries@inforegulator.org.za

Complaints: paiacomplaints@inforegulator.org.za

5. APPLICABILITY TO WELLTEC GROUP

Welltec Group is a South African-based financial services group. Welltec Group is a trusted leader in employee financial wellness and rehabilitation services

Welltec Group is a registered company in terms of the Companies Act, act 71 of 2008 as Amended.

The Welltec Group of companies falls within the definition of a private body; therefore, the sections in the Act, pertaining to private bodies will be applicable. The Group's mission is to empower financially distressed employees to regain control of their finances.

This manual applies to Welltec Group and all its South African based registered companies, insofar companies are its subsidiaries and are legal entities. For ease of reference a non-exhaustive list of entity names/trading names are provided in paragraph 13 of this manual. Access to the records of any subsidiary company of Welltec Group not listed in this manual may be requested from the Information Officer.

5.1 Availability of this Manual

This manual is in English and is available for inspection, free of charge, at:

- the Welltec Website;
- and at the physical address of Welltec Group
- on request from the Information Officer.

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

6.1 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.

- 6.2 The Guide is available in each of the official languages and in braille.
- 6.3 The aforesaid Guide contains the description of-
- 6.3.1 the objects of PAIA and POPIA;
 - 6.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 6.3.2.1 the Information Officer of every public body, and
 - 6.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 6.3.3 the manner and form of a request for-
 - 6.3.3.1 access to a record of a public body contemplated in section 11³ (Form 02: [Request for Access to Record](#)[Regulation 7]); and
 - 6.3.3.2 access to a record of a private body contemplated in section 50⁴ Form 02: [Request for Access to Record](#)[Regulation 7]).
 - 6.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 6.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 6.3.6 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-

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.*

- 6.3.6.1 an internal appeal;
- 6.3.6.2 a complaint to the Regulator; and
- 6.3.6.3 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;

- 6.3.7 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;
- 6.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 6.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 6.3.10 the regulations made in terms of section 92¹¹.

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

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 head 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.”

6.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

6.5 The Guide can also be obtained-

- 6.5.1 upon request to the Information Officer;
- 6.5.2 from the website of the Regulator (https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf).

6.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

- 6.6.1 English & Afrikaans

7 CATEGORIES OF RECORDS OF WELLTEC GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Note: Welltec Group does not provide information on categories of records which are available without a person having to request access and/or are automatically available.

Category of records	Types of the Record	Available on Website	Available upon request
Complaints Submission Procedure	Digital	X	X
Privacy Statement	Digital	X	X
Conflict Of Interest Policy	Digital		X
Treating Customers Fairly	Digital		X
Terms of Use	Digital	X	X

8 DESCRIPTION OF THE RECORDS OF WELLTEC GROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER 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
POPI Policy	Protection of Personal Information Act 4 of 2013
BBB-EE Certificate (WELLTEC GROUP (PTY) LTD)	Broad-Based Black Economic Empowerment Act, 2003 (Act 53 of 2003)
HR Policy & Procedures	Basic Conditions of Employment Act, 1997 (Act 75 of 1997)

9 DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY WELLTEC GROUP

Subjects on which the body holds records	Categories of records
Strategic Documents	Annual Financial Statements
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records
Compliance (Employees)	<ul style="list-style-type: none"> - Section 13 Certificate - FAIS Disclosures - MIE - ID's - Residential Addresses - Bank Details - Contact Numbers - DOFA - Qualifications - Gender - Race

10 PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of Processing Personal Information

WELLTEC GROUP market products telephonically to persons whose data has been received from their clients.

10.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services.

10.2.1 Employees Records

Employee" refers to any person who works for or provides services to or on behalf of Welltec Group and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Welltec Group and includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers. Employee Records may include the following:

- Personal records provided by employees.
- Records provided by a third party relating to employees.
- Conditions of employment and other employee related contractual and quasi-legal records.
- Correspondence relating to employees; and
- Training schedule/s and material.

Note: the accessibility of the documents listed below may be subject to the grounds of refusal: - employee records

10.2.2 Customers/Client Related Records

A "client" refers to any natural or juristic entity that receives services from Welltec Group Group. Client Records may include the following:

- Records provided by a client to an intermediary.
- Records provided by a third party.
- Records generated by or within Welltec Group relating to clients, including transactional records.

10.2.3 Group Company Records

These records include but are not limited to the records that Welltec Group holds of their own affairs. Company records may include the following:

- Financial records
 - Internal correspondence
 - Information technology
 - Operational records
 - Product records
 - Statutory records
 - Communications
 - Internal Policies and Procedures
 - Human Resources records
- Administration records, Service level agreements, contracts, and other agreements.

10.2.4 Client care records

- Policy/contract documents
- Applications
- Amendments
- Financial transactions
- Alterations
- General information

10.2.5 Alternate records

- Company secretarial records
- Databases
- Marketing records
- Treasury-related records
- Securities and equities
- Records held by an official of Welltec Group

These records include but are not limited to the records which pertain to Welltec Group's own affairs.

10.2.6 Other Records

These records are pertaining to:

- Shareholders
- Directors
- Employees

- Other stakeholders

Categories of Data Subjects	Personal Information that may be processed
Employees	<ul style="list-style-type: none"> - Section 13 Certificate - FAIS Disclosures - MIE - ID's - Residential Addresses - Bank Details - Contact Numbers - DOFA - Qualifications - Gender - Race - health information, disability information, employee benefit information, tax number, letter of appointment, vehicle registration information, performance records, pay slips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage, next of kin information, beneficiary information, sexual health, sexual orientation, trade union membership, religious or philosophical beliefs, biometric information (photos)
Clients/Customers of the Welltec Group	<ul style="list-style-type: none"> - CIPC Documentation, Directors Identity Numbers, Company Proof of address, Proof of Bank Account, TAX Certificate, & VAT status - name, address, contact numbers, identity numbers, employment status and bank details, CCTV footage, biometric information (photos), call recordings, vehicle, and driver registration information, payment records, geo-location, policy information, contact person information if the client is a juristic person.
Group Company Records	<ul style="list-style-type: none"> - Financial records - Internal correspondence - Information technology - Operational records - Product records - Statutory records - Communications - Internal Policies and Procedures - Human Resources records
Client care records	<ul style="list-style-type: none"> - Policy/contract documents - Applications - Amendments - Financial transactions - Alterations - General information

Alternate records	<ul style="list-style-type: none"> - Company secretarial records - Databases - Marketing records - Treasury-related records - Securities and equities - Records held by an official of Welltec Group
Other records	<ul style="list-style-type: none"> - Shareholders - Directors - Employees - Other stakeholders
Service Providers including third parties, contractors, suppliers and vendors of the Welltec Group	<p>CIPC Documentation, Directors Identity Numbers, Company Proof of address, Proof of Bank Account, TAX Certificate, & VAT status.</p> <p>CCTV footage, biometric information (photos), call recordings, vehicle, and driver registration information, payment records, geo-location,</p>

11 THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED TO

A requester is any party who request access to a record that is held by Welltec Group. A requester is entitled to request access to their own information or information pertaining to third parties, where the requester has a legitimate interest to protect or is appropriately authorised.

Further to this, and subject to the nature of the information requested, Welltec Group may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data (such as the National Credit Regulator in terms of the National Credit Act 34 of 2005) – please reference list above for more examples.
- Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data held by Welltec Group in terms of the applicable rules (such as the Competition Commission of the Competition Act 89 of 1998)
- The South African Revenue Service, or another similar authority.
- The Department of Labour, or other similar authority.
- A contracted third party who requires the information to provide healthcare services to a member or their dependents on their health plan.
- Anyone making a successful application for access in terms of PAIA
- Auditing and accounting bodies (both internal and external)
- Research or academic institutions (where applicable)
- Information regarding a data subject's creditworthiness with any credit bureau or credit provider, industry association or other association where Welltec Group operates in, provided it is in line with the provisions in POPIA, the relevant POPIA codes of conduct and the National Credit Act 34 of 2005.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification, verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Sanction Screening Checks	FIC screening platform and other AML screening platforms
Personal Information as contained in FICA packs	Various stakeholders, potential business partners and Financial Institutions.

11.1 Planned transborder flows of personal information

Welltec Group may transfer personal information to third parties who are outside the borders of South Africa. When transferring the data to alternative jurisdiction's, it is done for certain products or services. Personal Information may also be stored (processed) in the cloud or on data servers that are located outside the borders of South Africa. Welltec Group will only do so in line with the provisions set out in POPIA and after a full assessment has been carried out on the provider and the country has been fully assessed, with sufficient security safeguards and measures in place.

11.2 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Please note that the below is not an exhaustive list of measures that are implemented.

- Firewall protection, malware protection, network encryption and virus protection are in place.
- Ransomware protections are in place.
- Laptop and mobile Data encryption is in place.
- Computer and laptop portal blocking is in place.
- Lock boxes for hard copy data storage are in place.
- Secure hard copy disposable facilities with shredding infrastructure are in place.
- Secure processes for secure back up of data are in place.
- Welltec enforce strong passwords and two-tier authentication processes.
- Anti-phishing and anti-spam software are in place.
- A clean desk policy is enforced.
- Wi-Fi security is in place.

- Storage lockers for personal cell phones storage at the Call centre.
- Network and data access control through a managed active directory is in place.
- A managed disposal of data no longer needed is in place.
- A managed disposal of old IT equipment is in place.

12 ACCESSING RECORDS HELD BY THE WELLTEC GROUP

Records held by Welltec Group will be accessed only once the prerequisite requirements for access have been met by a requester. A requester is any person making a request for access to a record of or held by Welltec Group. There are two types of requesters:

a) Personal requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester.

Welltec Group will voluntarily provide the requested information or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested could be charged.

b) Other requester

This requester (other than a personal requester) is entitled to request access to information on third parties. However, Welltec Group is not obliged to voluntarily grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee.

13 DECISION ON PROVIDING INFORMATION

- Welltec Group will, within 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.
- The 30-day period within which Welltec Group must decide whether to grant or refuse the request, may be extended for a further period of not more than 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 Welltec Group and the information cannot reasonably be obtained within the original 30-day period. The Information Officer will notify the requester in writing should an extension be sought.

14 GROUNDS FOR REFUSAL

Welltec Group may refuse a request for information based on the following:

- Mandatory protection of the privacy of a third party who is a natural person, that would involve the unreasonable disclosure of personal information of that natural person.
- Mandatory protection of the commercial information of a third party, if the record

contains:

- i. Trade secrets of that third party.
 - ii. Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - iii. Information disclosed in confidence by a third party to Welltec Group Group, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- c) Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation.
- d) Mandatory protection of the safety of individuals and the protection of property.
- e) Mandatory protection of records which would be regarded as privileged in legal proceedings.
- f) The commercial activities of Welltec Group, which may include:
- i. Trade secrets of Welltec Group.
 - ii. Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of Welltec Group.
 - iii. Information which, if disclosed, could put Welltec Group at a disadvantage in negotiations or commercial competition.
 - iv. A computer program which is owned by Welltec Group, and which is protected by copyright.
- g) The research information of Welltec Group or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- h) Requests for information that is clearly frivolous or vexatious, or which involve an unreasonable diversion of resources, shall be refused.

1. REMEDIES AVAILABLE WHEN WELLTEC GROUP REFUSES A REQUESTOR

a) Internal Remedies

Welltec Group does not have internal appeal procedures. Therefore, the decision made by the Information Officer is final. Requesters who are dissatisfied with a decision of the Information Officer will have to exercise external remedies at their disposal.

b) External Remedies

A requester or a third party, who is dissatisfied with an Information Officer's refusal to disclose information, or the disclosed information may within 30 days of notification of the decision, apply to the Constitutional Court, the High Court or another court of

similar status for relief.

2 FEES

- a) The Act provides for two types of fees, namely:
 - i. A request fee, which will be a standard fee; and
 - ii. An access fee will be calculated considering reproduction costs, search and preparation time and cost, as well as postal costs.
- b) When the request is received by the Information Officer, the officer will by notice require the requester, other than a personal requester, to pay the regulated prescribed request fee (if any) before further processing of the request.
- c) The Information Officer can withhold a record until the requester has paid the fees as indicated.
- d) A requester whose request for access to a record has been granted must pay an access fee for reproduction, for search, preparation and for any time reasonably required more than the prescribed hours to search for and prepare the record(s) for disclosure including arrangements to make it available in the requested format.

NOTE: Not requesting a fee will be at the discretion of the Information officer.

15 AVAILABILITY OF THE MANUAL

- 15.1 A copy of the Manual is available-
 - 15.1.1 on www.welltec.co.za
 - 15.1.2 on the Information Regulators portal
 - 15.1.3 head office of WELLTEC GROUP for public inspection during normal business hours;
 - 15.1.4 to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 15.1.5 to the Information Regulator upon request.
- 15.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

16 UPDATING OF THE MANUAL

This manual is prepared by the Information Officer, Thandokuhle Buthelezi, and will be updated as any changes to relevant legislation, processes, or persons responsible occur.

The new consolidated manual has been drafted and provided to the Welltec Group Board of directors for consideration and approval and will be published on the Group website upon approval by the Board of Directors.

Issued by

Thandokuhle Buthelezi (Information Officer)

ANNEXURE A

A comprehensive list of all Welltec Group companies is available from the Welltec Group company secretariat. Kindly refer to the Manual for the details of the company's Head of Legal, Risk and Compliance. The annexure below lists all active companies

Welltec Shared Services (Pty) Ltd	A registered FSP	2015/417493/07
Welltec Group (Pty) Ltd	Private Company	2020/697030/07
Welltec Finance (RF)(Pty) Ltd	A registered CP	2018/217419/07
Welltec Collections (Pty) Ltd	Private Company registered with Debt Collectors Association	2025/102295/07
Repear Debt Restructuring (Pty) Ltd	Private Company registered with Debt Counsellors Association	2020/510765/07
Welltec Financial Services (Pty) Ltd	A registered FSP	2018/302982/07
Welltec Finance (RF1) (Pty) Ltd	A registered CP	2020/789966/07
Welltec Finance (RF2) (Pty) Ltd	A registered CP	2021/973603/07
Imas Welltec (RF) (Pty) Ltd	A registered CP	2021/973627/07
Welltec Finance (RF4) (Pty) Ltd	Private Company Registration with NCR as CP is pending	2022/271621/07
Phakisa Welltec (Pty) Ltd	A registered CP	2016/399403/07

FINAL APPROVED BY BOARD ON 16.04.2026

Welltec GroupPAIA Manual_10.04.2026_Approved16.04.2026

Final Audit Report

2026-05-06

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