



Entegri Enterprises (Pty) Ltd

PAIA Manual

Prepared in terms of Section 51 of the
Promotion of Access to Information Act,
2000 (Act No. 2 of 2000)

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1. Introduction and Purpose

This Manual is prepared by Entegri Enterprises (Pty) Ltd in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and the PAIA Regulations as amended (including the 2021 Regulations published under GN R.187).

PAIA gives effect to the constitutional right of access to information as entrenched in Section 32 of the Constitution of the Republic of South Africa, 1996. Access to information held by a private body may be requested where the information is required for the exercise or protection of any right.

The purpose of this Manual is to inform members of the public, clients, employees, regulators, and other stakeholders of:

- The categories of records held by Entegri Enterprises (Pty) Ltd;
- The procedure and prescribed forms for submitting requests for access to records;
- The applicable fees payable in connection with such requests;
- The timeframes within which requests will be processed;
- The grounds on which access may be refused; and
- The remedies available to requesters in the event of a refusal or deemed refusal.

This Manual also sets out Entegri's obligations and procedures under the Protection of Personal Information Act 4 of 2013 ("POPIA") in respect of the personal information it processes.

2. Contact Details of the Private Body

Company Name	Entegri Enterprises (Pty) Ltd
Registration Number	2013/137202/07
Registered Address	477 Jan Bantjies Street, Sinoville, Pretoria, 0182, South Africa
Postal Address	477 Jan Bantjies Street, Sinoville, Pretoria, 0182, South Africa
Email Address	info@entegri.net
Website	www.entegri.net
Nature of Business	Financial consulting, project finance advisory, and related professional services

3. Information Officer

In terms of PAIA and POPIA, Entegri Enterprises (Pty) Ltd has designated the following person as its Information Officer. The Information Officer is responsible for handling PAIA requests, ensuring compliance with data protection legislation, and serving as the primary point of contact for matters relating to personal information.

Name	Rayno Loubser
Designation	Information Officer
Email Address	rayno@entegri.net
Telephone	+27 84 558 8084
Postal Address	477 Jan Bantjies Street, Sinoville, Pretoria, 0182, South Africa

All PAIA requests, POPIA queries, and complaints should be directed to the Information Officer in the first instance.

Information Regulator of South Africa

Website: www.inforegulator.org.za

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: inforeg@justice.gov.za

The Information Regulator is the supervisory authority for both PAIA and POPIA in South Africa.

4. Guide to Exercising Rights Under PAIA

The Information Regulator has compiled a guide explaining how a person may exercise their rights under PAIA. The guide provides information on the procedure for submitting a request for access to information, prescribed forms and applicable fees, timeframes for responses, and available remedies and appeal mechanisms.

The guide is available from the Information Regulator:

Guide Availability

Website: www.inforegulator.org.za

Email: inforeg@justice.gov.za

Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017

The guide is available free of charge from the Information Regulator.

5. Records Held by Entegri Enterprises (Pty) Ltd

Entegri Enterprises (Pty) Ltd maintains records in accordance with its operational, statutory, and regulatory requirements. The categories of records held, together with descriptions and indicative retention periods, are set out below.

Access to records may be subject to the grounds for refusal set out in PAIA (see Section 10). Certain records may also contain personal information of third parties, in which case access may be refused or limited to protect such parties' privacy rights.

5.1 Corporate and Governance Records

Category	Description of Records	Typical Retention Period
Incorporation & Constitutional Documents	Company registration documents, Memorandum of Incorporation (MOI), Certificate of Incorporation, amendments to constitutional documents.	Indefinite (statutory)
Ownership & Shareholding Records	Shareholder register, share certificates, records of directors and officers, securities register.	Indefinite (Companies Act)
Board & Governance Records	Board resolutions, minutes of meetings, governance policies, delegation of authority frameworks.	7 years (Companies Act)
Statutory Filings	Annual returns, CIPC filings, statutory notices and regulatory submissions.	7 years

5.2 Financial and Accounting Records

Category	Description of Records	Typical Retention Period
Accounting Records	General ledger, trial balance, journals, chart of accounts, management accounts.	5 years (SARS / TAA)
Tax Records	Income tax returns, VAT returns, PAYE records, tax assessments, SARS correspondence.	5 years minimum (TAA s29)
Banking Records	Bank statements, payment records, reconciliations.	5 years (SARS / TAA)
Financial Statements	Annual financial statements, audit or independent review reports.	7 years (Companies Act)
Project Finance Records	Financial models, funding agreements, debt schedules, DSCR/LLCR calculations, lender reports for project finance engagements (including power plant and energy projects).	Duration of project + 5 years
Client Billing & Invoices	Tax invoices, credit notes, fee statements, payment records.	5 years (VAT Act)

5.3 Client and Advisory Records

Category	Description of Records	Typical Retention Period
Client Engagement Files	Engagement letters, scope of work documents, advisory mandates, correspondence.	Duration of engagement + 5 years
Consulting & Advisory Deliverables	Financial models, reports, due diligence findings, feasibility studies, valuation reports.	Duration of engagement + 5 years
Cross-Border Advisory Records	Records relating to advisory services for entities in Mozambique and Mauritius, including SPV documentation, regulatory correspondence, and cross-border filings.	Engagement end + 5 years (or as required by applicable foreign law)
Non-Disclosure Agreements	Signed NDAs, confidentiality undertakings.	Duration of agreement + 3 years
Service Level Agreements	Signed SLAs and retainer agreements.	Duration of agreement + 5 years

5.4 Human Resources Records

Category	Description of Records	Typical Retention Period
Employment Contracts	Signed contracts of employment, variations, termination documentation.	Duration of employment + 3 years (BCEA)
Payroll Records	Salary records, IRP5 / IT3(a) certificates, PAYE returns, leave records.	5 years (SARS / BCEA)
Personnel Files	CVs, performance records, disciplinary records, training records.	Duration of employment + 3 years
Independent Contractor Records	Contractor agreements, invoices, tax declarations.	5 years

5.5 Information Technology and Communications Records

Category	Description of Records	Typical Retention Period
Electronic Communications	Emails, correspondence records relevant to business activities.	3 years (or longer if subject to legal hold)
Website and Platform Records	Website logs, cookie consent records, platform usage data.	12 months
Data Protection Records	PAIA Manual, POPIA compliance documentation, data subject requests, processing records.	5 years from date of creation
IT Security Records	System access logs, incident logs, security policies.	3 years

5.6 Compliance and Regulatory Records

Category	Description of Records	Typical Retention Period
Regulatory Correspondence	Correspondence with SARS, CIPC, Information Regulator, FSCA, and other regulatory bodies.	5 years
Compliance Policies	Internal compliance policies, anti-money laundering procedures, conflict of interest policies.	Current version + 5 years after superseded
PAIA Documentation	This Manual, PAIA request records, responses, refusals.	5 years from date of request
POPIA Compliance Records	Data subject consent records, processing records, data breach notifications.	5 years from date of record

6. Records Available Without a Formal PAIA Request

The following records or information may be accessed without submitting a formal PAIA request:

- Published content on Entegri’s website (www.entegri.net), including the Privacy Policy, Website Disclaimer, and Terms of Use;
- This PAIA Manual (available on the website and upon request from the Information Officer);
- General information about Entegri’s services provided through normal business communication;
- Publicly available records filed with CIPC (e.g., annual returns, MOI) accessible through the CIPC portal.

Requesters seeking access to other records held by Entegri must follow the formal PAIA request procedure set out in Section 7 below.

7. Request Procedure and Prescribed Forms

7.1 Who May Submit a Request

Any person, including a juristic person, may submit a request for access to a record held by Entegri, provided such access is required for the exercise or protection of any right. A requester must identify the right they seek to exercise or protect and explain why the record requested is required for that purpose.

7.2 Prescribed Form

Requests must be submitted using the prescribed Form C as set out in the PAIA Regulations, 2021 (published under the Promotion of Access to Information Act, 2000). A copy of Form C is included as Annexure A to this Manual and is also available from:

- The Information Regulator: www.inforegulator.org.za
- The Department of Justice and Constitutional Development: www.justice.gov.za

Entegri does not accept PAIA requests on forms other than the current prescribed Form C, unless the Information Officer agrees otherwise in writing.

7.3 How to Submit a Request

Completed Form C must be submitted to the Information Officer by one of the following methods:

Email	rayno@entegri.net (preferred method)
Postal address	477 Jan Bantjies Street, Sinoville, Pretoria, 0182 (mark envelope: PAIA Request — Confidential)
Hand delivery	477 Jan Bantjies Street, Sinoville, Pretoria, 0182 (by prior arrangement with the Information Officer)

7.4 What the Request Must Include

A valid PAIA request must include:

- The requester's full name, contact details, and (if applicable) the name and contact details of the person on whose behalf the request is made;
- A description of the record(s) sought, in sufficient detail to enable the Information Officer to identify the record;
- The right the requester seeks to exercise or protect;
- The reason why the record is required for the exercise or protection of that right;
- The preferred form of access (copy, inspection, etc.);
- Proof of identity (copy of ID document or passport).

Requests that do not include the above information may be rejected or returned to the requester for completion.

8. Prescribed Fees

Fees are prescribed by the Minister of Justice and Constitutional Development under the PAIA Regulations. The applicable fee structure as at the effective date of this Manual is set out below. Fees are subject to amendment by the Minister; the Information Officer will advise requesters of current applicable fees at the time of their request.

8.1 Request Fee

Item	Fee (incl. VAT)
Request fee (payable upfront with submission of Form C)	R140.00
Personal requester (requester seeking own personal information)	No request fee payable

Note on Request Fee

A requester who is seeking access to their own personal information is not required to pay the request fee.

A requester who cannot afford the request fee may apply for exemption. Such application must be submitted in writing to the Information Officer with supporting documentation.

8.2 Reproduction and Access Fees

Item	Fee (incl. VAT)
Photocopy — A4 page (black and white)	R2.00 per page
Photocopy — A4 page (colour)	R7.00 per page
Printed copy of electronic record — A4 page	R2.00 per page
Compact disc (CD)	R70.00 per disc
USB/Electronic copy (email or download)	R40.00
Inspection of records (per hour or part thereof)	R145.00 per hour (first hour free)
Transcription of visual image (per A4 page)	R40.00 per page

8.3 Deposit

Where the Information Officer reasonably estimates that reproduction costs will exceed R600.00 (exclusive of the request fee), the Information Officer may require the requester to pay a deposit of not more than one-third of the estimated total reproduction fee before processing the request.

8.4 Payment Method

Fees must be paid by electronic funds transfer (EFT) to Entegri’s designated bank account, details of which will be provided by the Information Officer upon request acknowledgement. Proof of payment must be submitted to the Information Officer.

9. Response Timeframes

The Information Officer will process PAIA requests in accordance with the timeframes prescribed by PAIA, as set out below:

Acknowledgement of receipt	Within 5 (five) business days of receiving a valid, complete request
Standard response period	Within 30 (thirty) days of receiving a valid, complete request (PAIA Section 56)
Extended response period	Up to an additional 30 (thirty) days where the request is for a large volume of records, or where the records are held at a location other than the Information Officer’s office, or where meeting the standard timeframe would unreasonably interfere with Entegri’s activities (PAIA Section 57)
Notice of extension	The Information Officer will notify the requester in writing before the expiry of the standard 30-day period if an extension is required
Deemed refusal	If the Information Officer fails to respond within the applicable timeframe, the request is deemed to have been refused (PAIA Section 58). The requester may then exercise the remedies described in Section 11 of this Manual

10. Grounds for Refusal of Access

The Information Officer may refuse access to a record in accordance with the grounds set out in PAIA. These include, but are not limited to:

- Protection of personal privacy: Disclosure would involve the unreasonable disclosure of personal information about a third party (PAIA Section 63).
- Confidential commercial information: Disclosure would reveal trade secrets or commercial, financial, scientific, or technical information that, if disclosed, could harm the commercial interests of Entegri or a third party (PAIA Section 64).
- Legal privilege: The record is protected by legal professional privilege (PAIA Section 67).
- Prejudice to ongoing negotiations: Disclosure would prejudice the conclusion of a contractual or other negotiation (PAIA Section 64).

- Research information: Premature disclosure would expose research information that has not yet been publicly released (PAIA Section 69).
- Records not held: The record requested is not held by Entegri or does not exist.
- Manifestly frivolous or vexatious: The request is manifestly frivolous or vexatious, or the disclosure of the record would be unlawful (PAIA Section 45).

Where access is refused, the Information Officer will provide written reasons for the refusal and inform the requester of their right to seek internal review or approach the Information Regulator or court.

11. Remedies and Appeals

If a requester is dissatisfied with the decision of the Information Officer (including a refusal or a deemed refusal due to non-response within the prescribed timeframe), the requester may pursue the following remedies:

11.1 Complaint to the Information Regulator

In terms of PAIA Section 77A (as amended), a requester may lodge a complaint with the Information Regulator if access to information has been refused, or if the requester believes that Entegri has failed to comply with its PAIA or POPIA obligations.

Information Regulator — Complaints

Website: www.inforegulator.org.za

Email: inforeg@justice.gov.za / PAIAComplaints@inforegulator.org.za

Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017

11.2 Court Application

A requester may apply to the High Court of South Africa for relief in terms of PAIA Section 78, where the Information Officer has refused access, is deemed to have refused access, or has failed to comply with a requirement of PAIA. Such application must be brought within 180 days of the refusal or deemed refusal.

11.3 Internal Escalation

Prior to pursuing external remedies, a requester is encouraged to raise any concerns or dissatisfaction in writing with the Information Officer. Entegri will endeavour to resolve disputes informally and expeditiously where possible.

12. Processing of Personal Information (POPIA)

Entegri Enterprises (Pty) Ltd processes personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"). This section sets out Entegri's compliance framework under POPIA,

including the eight conditions for lawful processing, categories of data subjects and information processed, and the rights of data subjects.

12.1 The Eight Conditions for Lawful Processing

POPIA prescribes eight conditions with which every responsible party must comply when processing personal information. The table below sets out each condition and how Entegri gives effect to it:

POPIA Condition	How Entegri Complies
1. Accountability	Entegri, as responsible party, takes responsibility for ensuring that all personal information processing within its operations complies with POPIA. The Information Officer oversees compliance and is the first point of contact for data protection matters.
2. Processing Limitation	Personal information is collected only for specific, explicitly defined, and lawful purposes. Processing is limited to what is adequate, relevant, and not excessive in relation to the purpose for which it is collected.
3. Purpose Specification	Personal information is collected for clearly defined purposes communicated to data subjects at the time of collection. Information is not retained beyond the period necessary for the purpose for which it was collected.
4. Further Processing Limitation	Personal information is not processed further in a manner incompatible with the purpose for which it was originally collected without the consent of the data subject, unless permitted by law.
5. Information Quality	Entegri takes reasonable steps to ensure that personal information is complete, accurate, not misleading, and updated where necessary, having regard to the purpose for which the information is collected and processed.
6. Openness	Data subjects are informed of the processing of their personal information in a transparent manner, including through this PAIA Manual and Entegri’s Privacy Policy published on its website.
7. Security Safeguards	Entegri implements appropriate technical and organisational measures to secure the integrity and confidentiality of personal information against loss, damage, or unauthorised access, disclosure, or processing. Employees and service providers are bound by confidentiality obligations.
8. Data Subject Participation	Data subjects have the right to access their personal information, request correction or deletion, and object to processing. Requests may be directed to the Information Officer and will be processed within 30 days.

12.2 Categories of Data Subjects

Entegri may process personal information relating to the following categories of data subjects:

- Clients and prospective clients (including individuals and juristic persons)
- Counterparties and transaction participants in project finance and cross-border advisory engagements
- Shareholders, directors, and beneficial owners of client entities
- Service providers, professional partners, and contractors
- Employees, prospective employees, and independent contractors
- Website users and business contacts

12.3 Categories of Personal Information Processed

Depending on the nature of the engagement or interaction, personal information processed may include:

- Full names and identity or passport numbers
- Contact details (email address, telephone number, postal and residential address)
- Employment, professional, and educational information
- Financial and banking information (where required for project finance or advisory mandates)
- Tax reference numbers and tax compliance information
- Contractual information and correspondence
- Directorship, shareholding, and beneficial ownership information
- Website usage data and IP addresses (collected automatically)

12.4 Purpose of Processing

Personal information is processed for the following purposes:

- Providing professional consulting, advisory, and project finance services
- Managing and performing contractual obligations
- Conducting due diligence, financial modelling, and feasibility assessments
- Complying with statutory and regulatory obligations (SARS, CIPC, FSCA, and other bodies)
- Financial administration, invoicing, and accounting
- Recruitment and management of employees and contractors
- Internal governance, risk management, and compliance activities
- Communication with clients, counterparties, regulators, and other stakeholders
- Direct marketing of Entegri's services (where consent has been obtained or where permitted under POPIA Section 69)

12.5 Lawful Basis for Processing

Entegri processes personal information on one or more of the following lawful bases as provided in POPIA Section 11:

- Consent of the data subject;
- Necessity to perform or conclude a contract to which the data subject is a party;
- Compliance with a legal or regulatory obligation applicable to Entegri;
- Entegri's legitimate business interests, provided such interests do not override the rights and freedoms of the data subject.

12.6 Recipients of Personal Information

Personal information may be shared, where necessary and subject to appropriate data protection safeguards, with:

- Professional advisers (legal, auditing, accounting, and compliance professionals)
- Financial institutions and funders involved in project finance transactions
- Regulatory authorities (SARS, CIPC, Information Regulator, FSCA)
- IT and cloud service providers supporting Entegri's operations
- Affiliated entities within Entegri's group or joint venture arrangements
- Transaction counterparties and co-advisers where required for mandate execution

12.7 Data Subject Rights under POPIA

In accordance with POPIA, data subjects have the following rights in respect of their personal information processed by Entegri:

- Right of access: To request confirmation of whether Entegri holds personal information about them and to obtain a copy.
- Right to correction or deletion: To request correction of inaccurate or incomplete information, or deletion of information no longer required.
- Right to object: To object to processing on grounds relating to their particular situation.
- Right to withdraw consent: To withdraw consent at any time (without affecting the lawfulness of prior processing).
- Right to opt out of direct marketing: In accordance with POPIA Section 69.
- Right to lodge a complaint: With the Information Regulator if they believe their rights under POPIA have been infringed.

Requests to exercise data subject rights should be submitted in writing to the Information Officer (rayno@entegri.net). Entegri will respond within 30 days of receiving a valid request.

13. Cross-Border Transfers of Personal Information

Due to the nature of Entegri's operations, personal information may be transferred to, stored in, or processed in jurisdictions outside the Republic of South Africa. Entegri's cross-border activities include advisory and project finance engagements involving entities in the following jurisdictions:

Mauritius

Entegri provides advisory services to and processes information relating to Mauritius-incorporated entities, including special purpose vehicles (SPVs) involved in energy and infrastructure projects. Mauritius has enacted the Data Protection Act 2017, which provides data protection standards broadly comparable to those under POPIA.

Mozambique

Entegri provides cross-border advisory and project finance services relating to Mozambique-based operations, including power generation projects. Where personal information is transferred to or processed in Mozambique, Entegri implements contractual safeguards to ensure adequate protection.

Other

To the extent that IT service providers or cloud infrastructure providers process data in other jurisdictions, Entegri will ensure that appropriate contractual or technical safeguards are in place prior to any such transfer.

In accordance with POPIA Section 72, Entegri will only transfer personal information to a third party in a foreign country where:

- The recipient country has laws that provide an adequate level of protection substantially similar to POPIA;
- The data subject has provided informed consent to the transfer; or
- The transfer is necessary for the performance of a contract between Entegri and the data subject, or is in the interests of the data subject and it is not reasonably practicable to obtain consent.

Where none of the above conditions are met, Entegri will enter into a binding agreement with the recipient that imposes obligations equivalent to the POPIA conditions for lawful processing before any transfer occurs.

14. Records Retention Schedule

Entegri retains records in accordance with applicable legal, regulatory, and operational requirements. The following schedule reflects minimum retention periods. Records will be securely destroyed or de-identified at the end of the applicable retention period unless a legal hold or ongoing proceeding requires further retention.

Category	Description of Records	Typical Retention Period
Incorporation & MOI	Company formation and constitutional documents.	Indefinite
Financial Statements	Annual financial statements and audit reports.	7 years (Companies Act s30)
Accounting & Tax Records	General ledger, trial balance, SARS returns, VAT records.	5 years (TAA s29; VAT Act s55)
Banking Records	Bank statements and payment records.	5 years (SARS)
Project Finance Files	Financial models, funding documentation, DSCR/LLCR schedules.	Duration of project + 5 years
Client Advisory Files	Engagement letters, reports, deliverables.	Engagement end + 5 years
Cross-Border Engagement Files	Mauritius/Mozambique advisory and SPV records.	Engagement end + 5 years (or as required by applicable foreign law)
Employment Records	Contracts, payroll, IRP5s, personnel files.	Employment end + 5 years (BCEA; SARS)
Contracts & Agreements	NDAs, SLAs, service agreements.	Expiry + 3 years (or 5 years if financial obligations)
PAIA Request Records	Requests received, responses, refusals.	5 years from date of request
POPIA / Consent Records	Data subject consents, processing records, breach notifications.	5 years from date of record
Correspondence	Business and client correspondence.	3 years from last contact
Website Usage Data	IP logs, cookie consent records.	12 months

The above retention periods are minimum periods. Entegri may retain records for longer periods where required by law, regulatory obligation, or ongoing legal proceedings. All records are disposed of securely at the end of the applicable retention period.

15. Availability of this Manual

This Manual is made available as follows:

- On Entegri’s website at www.entegri.net (freely accessible to the public);
- Upon request from the Information Officer (email: rayno@entegri.net) — a copy will be provided free of charge in electronic format;
- In printed format at Entegri’s registered office (by prior appointment).

This Manual satisfies Entegri’s obligations under PAIA Section 51(3), which requires that the manual be made available at the registered office and on the website of the private body.

16. Amendments to this Manual

Entegri Enterprises (Pty) Ltd reserves the right to update or amend this Manual from time to time to reflect changes in applicable legislation, regulatory requirements, or Entegri’s operational practices.

Any amendments will be published on Entegri’s website with an updated version number and effective date. Material changes will be communicated to known stakeholders where practicable.

Current Version	1.1
Effective Date	5 March 2026
Approved By	Rayno Loubser, Information Officer
Next Review Date	March 2027 (or earlier if legislative amendments require)

ANNEXURE A

PAIA REQUEST FORM (FORM C)

Form C is the prescribed request form under the PAIA Regulations, 2021. Requesters must complete and submit Form C to the Information Officer when requesting access to records held by Entegri Enterprises (Pty) Ltd.

Where to Obtain the Current Prescribed Form C

The prescribed Form C (in its current version as updated by the 2021 PAIA Regulations) is available from:

1. The Information Regulator of South Africa:

Website: www.inforegulator.org.za

Email: infoereg@justice.gov.za

2. The Department of Justice and Constitutional Development:

Website: www.justice.gov.za/infoereg/

3. Entegri's Information Officer:

Email: rayno@entegri.net

A copy will be provided on request free of charge.

Note: As form specifications are subject to regulatory amendment, requesters are advised to obtain the most current version of Form C directly from the Information Regulator prior to submission.

Completed forms should be submitted to the Information Officer by email to rayno@entegri.net, accompanied by a copy of the requester's identity document or passport, and proof of payment of the applicable request fee (where required).