PROMOTION OF ACCESS TO INFORMATION MANUAL

NKWE FUND MANAGEMENT (PTY) LTD

(Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended)

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2. INTRODUCTION

This Manual is prepared in terms of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), read with the Protection of Personal Information Act, 4 of 2013 ("POPIA"). It explains how a requester may seek access to records held by Nkwe Fund Management (Pty) Ltd ("NKWE" or "the Company") where access is lawful and required to exercise or protect a right.

PAIA gives effect to the right of access to information and POPIA regulates the lawful processing of personal information. This Manual outlines:

- The categories of records maintained by NKWE
- The procedure for submitting an access request
- The principal grounds on which access may lawfully be refused
- The fees and remedies that may apply to a request.

3. COMPANY DETAILS

The details below identify NKWE and its PAIA contact points. Placeholders must be completed before approval and publication.

Registered Name	Nkwe Fund Management (Pty) Ltd
Trading Name	Nkwe Fund Management
Legal Form	Private Company (Pty) Ltd
Registration Number	2024/527215/07
FSP Status	Juristic Representative of nReach Capitis Laysan (Pty) Ltd, FSP 47502
VAT Number	4910322090
Physical Address	147 Garsfontein Road, Alphen Park, Gauteng, 0081
Postal Address	147 Garsfontein Road, Alphen Park, Gauteng, 0081
Head of Business	Jacobus Crous Britz
Information Officer	Jacobus Crous Britz
Designation	Information Officer
Telephone Number	071 611 3239
Email Address (PAIA Contact)	Jaco@britzoffice.com / info@nkwefundmanagement.com
Website	https://nkwefm.com/

4. DESCRIPTION OF BUSINESS OPERATIONS

NKWE is a South African investment management business focused on private equity, venture capital and growth equity. It operates as a Juristic Representative of nReach Capitis Laysan (Pty) Ltd, FSP 47502, and, where applicable, performs regulated financial services under the Principal FSP's authorisation and oversight.

NKWE's business activities may include the following:

- Sourcing and assessing private equity, venture capital and growth equity opportunities
- Investment analysis, due diligence and transaction structuring
- Engagement with investors, counterparties, advisers and portfolio companies
- Governance, strategic guidance and portfolio monitoring
- BEE and responsible governance considerations in investment decisions.

South Africa is NKWE's primary market, with selected opportunities elsewhere in Africa and internationally where strategically appropriate and legally permissible.

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS

Section 10 of PAIA requires the Information Regulator to publish a Guide to help the public understand and exercise access-to-information rights. The Guide explains request procedures, timeframes, fees and remedies.

The Guide includes information on:

- Prescribed request forms and procedures
- Time periods and fees
- Complaint procedures and remedies.

You may obtain the Guide from the Information Regulator or request it from NKWE's Information Officer. It is published in South Africa's official languages.

Information Regulator PAIA page: https://inforegulator.org.za/paia/

General enquiries: enquiries@inforegulator.org.za

PAIA complaints: PAIAComplaints@inforegulator.org.za

Telephone: 010 023 5200 / Toll Free 0800 017 160

Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

6. RECORDS AUTOMATICALLY AVAILABLE (SECTION 52(2))

The following records are generally available without a formal PAIA request, subject to lawful restrictions:

Type of Record	Available Via
Company profile, brochures and public corporate information	NKWE website or on request
Juristic Representative and Principal FSP disclosure information	Website, disclosure documentation or on request
POPIA privacy statement/privacy notice	NKWE website or relevant onboarding material
Conflict of interest and complaints information, where publicly available	Website or on request from the Information Officer
PAIA Manual	NKWE website or on request from the Information Officer

7. RECORDS HELD BY THE COMPANY

7.1. Corporate and Governance Records

- Memorandum of Incorporation and statutory company records
- Shareholder, beneficial ownership and director information
- CIPC filings and corporate resolutions
- Governance, board and committee records
- Juristic Representative, Principal FSP and related compliance documentation

7.2. Investor, Client and Counterparty Records

- Client, investor, counterparty and beneficial-owner identification records
- KYC and due diligence documentation
- Applications, mandates, agreements and disclosures
- Correspondence, instructions and complaints
- Screening, risk and compliance records

7.3. Investment, Portfolio and Financial Records

- Investment proposals, due diligence and valuations
- Investment committee submissions and decisions
- Transaction agreements and portfolio monitoring records
- Financial statements, tax, invoice and accounting records

7.4. Human Resources and Personnel Records

- Employment agreements and personnel records
- Payroll, tax, UIF and employee benefit records
- Leave, performance and disciplinary records
- Training and competency records, where applicable

7.5. Operational, Risk and Compliance Records

- POPIA, PAIA and information-governance records
- Risk, compliance and internal-control records
- Cybersecurity and IT records
- Business continuity and information-security records
- Service-provider and confidentiality records

8. PURPOSE OF PROCESSING PERSONAL INFORMATION (POPIA COMPLIANCE)

NKWE processes personal information for legitimate business and legal purposes, including:

- Meeting legal, regulatory and contractual obligations
- Onboarding, verification, due diligence and screening
- Managing investment and portfolio relationships
- Contract, governance, finance and operational administration
- Employment and personnel administration
- Stakeholder communications
- Lawful marketing and business-development communications.

8.1. Categories of Data Subjects

- Investors, clients and prospective clients
- Directors, trustees, shareholders, beneficial owners and signatories
- Portfolio-company personnel and counterparties
- Employees, applicants and contractors
- Advisers, service providers and suppliers.

8.2. Types of Personal Information Processed

Natural Persons	Juristic Persons
Name, identity or passport details, date of birth and address	Registered name, registration number and registered address
Contact details, occupation and employment information	Directors, trustees, shareholders and beneficial ownership information
Financial, tax, banking and source-of-funds / source-of-wealth information, where required	Tax, VAT, banking, financial and corporate records
Due diligence, screening, correspondence and contractual information	Authorised signatories, representatives and business contact details

8.3. Special Personal Information (if applicable)

Special personal information is processed only where reasonably required and lawfully permitted. This may include criminal-behaviour information for due diligence, biometric information for security, health information for employment or benefits administration, and PEP/PIP status for risk-based screening.

8.4. Trans-Border Information Flows

Cross-border transfers of personal information will comply with POPIA section 72. NKWE will rely on an adequate level of protection, contractual safeguards, consent or another lawful basis for the transfer.

9. INFORMATION SECURITY MEASURES

NKWE applies reasonable technical and organisational safeguards to protect personal information against loss, unauthorised access, misuse, alteration or destruction. Controls include:

- Controlled access to electronic and physical records
- Authentication and user-access controls
- Malware and cyber-risk protection
- Secure storage, backup and retention controls
- Confidentiality obligations for staff and relevant third parties
- POPIA, PAIA and security awareness
- Secure disposal when retention is no longer required.

10. PROCEDURE TO REQUEST ACCESS TO RECORDS

A requester must submit prescribed Form 2 with enough information to identify the requester, locate the record and explain the right to be exercised or protected.

1. Complete Form 2 – Request for Access to Record, available from the Information Regulator's PAIA page.
2. Describe the requested record with enough detail to allow it to be identified and specify the right that requires the information.
3. Provide proof of identity and, where a representative acts for another person, documentary proof of authority.
4. Pay the prescribed request fee where applicable. A personal requester is not required to pay the request fee.
5. Submit the completed request and supporting documents to NKWE's Information Officer.

Email: Jaco@britzoffice.com / info@nkwefundmanagement.com
Physical address: 147 Garsfontein Road, Alphen Park, Gauteng, 0081

NKWE will ordinarily make a valid request within 30 calendar days, subject to any extension permitted by PAIA. The requester will be notified where an extension applies.

Access will be considered where PAIA procedures are met, the record is required to exercise or protect a right, and no lawful refusal ground applies.

11. REFUSAL OF ACCESS

NKWE may refuse access where PAIA requires or permits it. Each request will be assessed on its facts and applicable third-party rights.

- The record contains protected third-party personal information
- Disclosure would reveal protected commercial or financial information
- The record is legally privileged or confidential
- Disclosure would breach a legal or contractual duty
- Access could prejudice security, law enforcement, regulation or another protected interest.

Where access is refused, NKWE will provide reasons and advise the requester of available remedies.

12. PRESCRIBED FEES

Fees are prescribed by the PAIA Regulations and may change. NKWE will advise the requester of applicable charges before access is provided.

Fee Type	Amount (ZAR)
Request fee for a private-body record (other than a personal requester)	R140.00
A4 photocopy or printed copy	R2.00 per page or part thereof
Flash drive supplied by requester	R40.00
Compact disc supplied by requester / supplied to requester	R40.00 / R60.00
Transcription of an audio record	R24.00 per A4 page
Visual image transcription or copy	Outsourced – actual service-provider quotation
Search and preparation after the first hour	R145.00 per hour or part thereof; maximum R435.00
Deposit where search exceeds six hours	One-third of the amount calculated for the applicable access fees
Postage, email or other electronic transfer	Actual expense, if any

A personal requester is exempt from the request fee, although other lawful access or reproduction charges may apply.

13. REMEDIES AVAILABLE TO REQUESTERS

NKWE is a private body and has no internal PAIA appeal procedure. A dissatisfied requester may:

- Lodge a written complaint with the Information Regulator using Form 5 after giving NKWE a reasonable opportunity to deal with the access request
- Submit the complaint to PAIAComplaints@inforegulator.org.za or use the Information Regulator's available complaint channels
- Apply to a competent Magistrate's Court or High Court for appropriate relief within the time period prescribed by PAIA.

Information Regulator complaints page: https://inforegulator.org.za/complaints/

14. REVIEW AND MANUAL AVAILABILITY

This Manual will be reviewed annually and when material legal, regulatory, business or contact changes occur. The current approved version will be available without charge on NKWE's website or from the Information Officer.

Approval Date	16/09/2026
Next Review Date	01/10/2027
Approved by	The Board
Version	Version 1.0

15. ANNEXURE A: LEGISLATIVE FRAMEWORK REFERENCE TABLE

This annexure summarises key PAIA and POPIA provisions supporting this Manual. The legislation and Regulations remain authoritative.

No.	Section of the Act	Legislative Summary	Applies To
1	Section 50(1) of PAIA	Access to a private-body record is granted when required to exercise or protect a right, procedures are met and no refusal ground applies.	Private Bodies
2	Section 51(1) of PAIA	Private bodies must compile a PAIA Manual containing prescribed information on records and access procedures.	Private Bodies
3	Section 52 of PAIA	Private bodies may make specified records available without a formal PAIA request.	Private Bodies
4	Section 53 of PAIA	Requests must use the prescribed form and provide enough detail for processing.	Private Bodies
5	Section 54 of PAIA	Prescribed request and access fees may be charged, subject to exemptions.	Private Bodies
6	Sections 56–57 of PAIA	Requests must be decided within the prescribed period, subject to lawful extension.	Private Bodies
7	Sections 58–59 of PAIA	PAIA regulates deferred access and third-party notice or consultation.	Private Bodies
8	Sections 63–69 of PAIA	These sections set out key grounds for refusing access to private-body records.	Private Bodies
9	Section 77A of PAIA	Eligible requesters or third parties may complain to the Information Regulator.	All Bodies

No.	Section of the Act	Legislative Summary	Applies To
10	Section 55 of POPIA	Information Officers have prescribed compliance and information-governance duties.	All Bodies
11	Section 72 of POPIA	Cross-border transfers require a lawful ground or appropriate safeguard.	Responsible Parties
12	Section 92 of PAIA	The Minister may prescribe fees, notices and procedural requirements.	All Bodies

16. LIST OF ACRONYMS AND ABBREVIATIONS (ALPHABETICAL ORDER)

No.	Acronym	Meaning
1	BEE	Black Economic Empowerment
2	CEO	Chief Executive Officer
3	CIPC	Companies and Intellectual Property Commission
4	DIO	Deputy Information Officer
5	FAIS	Financial Advisory and Intermediary Services Act, 2002
6	FICA	Financial Intelligence Centre Act, 38 of 2001
7	FSCA	Financial Sector Conduct Authority
8	FSP	Financial Services Provider
9	HR	Human Resources
10	ICT	Information and Communications Technology
11	IO	Information Officer
12	KYC	Know Your Client / Know Your Customer
13	NKWE	NKWE Fund Management (Pty) Ltd
14	PAIA	Promotion of Access to Information Act, 2 of 2000, as amended
15	PEP	Politically Exposed Person
16	PIP	Prominent Influential Person
17	POPIA	Protection of Personal Information Act, 4 of 2013
18	Regulator	Information Regulator (South Africa)
19	Republic	Republic of South Africa
20	SARS	South African Revenue Service
21	UIF	Unemployment Insurance Fund