

PROMOTION OF ACCESS TO INFORMATION ACT

Act No. 2 of 2000

PAIA MANUAL

OF AFRICA AUTOMOTIVE HOLDINGS (PTY) LTD

Registration Number: 2023/277064/07

Trading as LDV South Africa

Amended: March 2025

1. Definitions

In this Manual, the following words bear the following meanings:

- "The Act" means the Promotion of Access to Information Act No. 2 of 2000, together with all relevant regulations published thereunder.
- "The Company" means Africa Automotive Holdings (Pty) Ltd, Registration Number 2023/277064/07, trading as LDV South Africa.
- "Manual" means this manual, together with all annexures thereto, as available at the offices of the Company and on the Company's website at www.ldvsouthafrica.co.za.
- "SAHRC" means the South African Human Rights Commission.
- "Information Officer" means the Information Officer appointed by the Company from time to time, whose details are set out in clause 3 below, to whom requests for information in terms of the Act must be addressed.

2. Introduction

The purpose of this Manual is to assist potential requestors in understanding the procedure for requesting access to records and information held by Africa Automotive Holdings (Pty) Ltd trading as LDV South Africa, as contemplated in terms of the Act.

This Manual applies to all operations of the Company, including its websites www.ldvsouthafrica.co.za and www.ldvauto.co.za and all related records in the Company's possession.

This Manual may be amended from time to time. The latest version will be made publicly available on the Company's website and at its registered premises. Any requestor requiring assistance with this Manual or the procedure for requesting access to information is encouraged to contact the Information Officer directly.

3. Contact Person and Address Details

The Company hereby appoints, in terms of section 51(1)(a) of the Act, the following individual as its Information Officer:

Contact Person: Gerhard Moolman — Chief Executive Officer & Information Officer

Physical Address: Block A, 4 Pieter Wenning Road, Sandton, Gauteng, 2191

Postal Address: P O Box 5042, Dainfern North, Johannesburg, Gauteng, 2055

Telephone: +27 (0)10 006 0449

Email: info@ldvsouthafrica.co.za

Website: www.ldvsouthafrica.co.za

All requests for access to information in terms of the Act must be directed to the Information Officer at the contact details set out above.

4. Guide in Terms of Section 10 of the Act

In terms of section 10 of the Act, the South African Human Rights Commission (SAHRC) has compiled a guide containing information required by persons wishing to exercise rights under the Act. This guide is available in all official languages and may be obtained from the SAHRC:

Organisation: South African Human Rights Commission — PAIA Unit

Postal Address: Private Bag 2700, Houghton, 2041

Physical Address: 33 Hoofd Street, Braamfontein, Johannesburg

Telephone: +27 11 877 3600

Website: www.sahrc.org.za

Email (PAIA): PAIA@sahrc.org.za

Email (general): info@sahrc.org.za

Queries or complaints relating to the processing of personal information may be directed to the Information Regulator:

Postal Address: P O Box 31533, Braamfontein, 2017

Website: www.inforegulator.org.za

Email (general): enquiries@inforegulator.org.za

Email (complaints): POPIAcomplaints@inforegulator.org.za

Telephone: 010 023 5241 / 010 023 5242

5. Categories of Records Available

Records are available in accordance with current South African legislation, to the extent that the relevant statute makes disclosure of records compulsory. The following records are publicly available without a person having to request access in terms of the Act:

5.1 Statutory Records

The Company maintains records in accordance with, among others, the following legislation:

- Protection of Personal Information Act No. 4 of 2013
- Companies Act No. 71 of 2008
- Income Tax Act No. 58 of 1962
- Value Added Tax Act No. 89 of 1991
- Labour Relations Act No. 66 of 1995
- Basic Conditions of Employment Act No. 75 of 1997
- Employment Equity Act No. 55 of 1998
- Skills Development Act No. 97 of 1998
- Occupational Health and Safety Act No. 85 of 1993
- Pension Funds Act No. 24 of 1956
- Unemployment Insurance Act No. 63 of 2001
- Compensation for Occupational Injuries and Diseases Act No. 130 of 1993

- Insolvency Act No. 24 of 1936
- Copyright Act No. 98 of 1978
- Trade Marks Act No. 194 of 1993

5.2 Automatically Available Records

Category	Examples
Statutory company records	Memorandum of Incorporation; Certificate of Incorporation; Register of Directors; CoR prescribed forms
Corporate communications	Press releases; product brochures and promotional literature
Human resources (public)	Employment equity returns; workplace skills development plan
Website content	All information published on www.ldvsouthafrica.co.za and www.ldvauto.co.za

5.3 Records Held by the Company

The Company holds the following categories of records, some of which are confidential and accessible only to authorised persons. Access to any of the records below requires a formal request in accordance with the Act:

Category	Records
Administration	Operating licences; board and management meeting minutes; correspondence
Human resources	Employment contracts; disciplinary records; salary records; leave records; training records and manuals; personal information of past, present and prospective employees
Operations	Client database; production records; legal agreements; commercial contracts; insurance policies
Finance	Bank reconciliations; financial statements; management accounts; accounting records; invoices; statutory returns
Company investments	List of subsidiary companies and related interests
External auditors	Details available on request from the Information Officer

6. Access to Records

A request for access to a record must be submitted in the prescribed form (see clause 14 below), addressed to the Information Officer, and accompanied by payment of the applicable request fee as prescribed. The Company will process requests in accordance with the timelines and procedures set out in the Act.

7. Procedure for Requesting Access to Information

A requestor must comply with the procedural requirements in the Act. In summary, the process is as follows:

- Complete the prescribed Request for Access to Record form (Form C, regulation 10) attached to this Manual as clause 14.
- Submit the completed form to the Information Officer by hand, post or email at the contact details in clause 3.
- Pay the applicable request fee (if required). Personal information requests about oneself are not subject to a request fee.
- The Information Officer will acknowledge receipt and respond within the period prescribed in the Act (generally 30 days, or 30 days extended by a further 30 days with notice).
- The Information Officer may refuse access on the grounds set out in the Act and will notify the requestor in writing of any refusal and the reasons therefor.

8. Processing of Personal Information

The Company processes personal information in accordance with its POPIA Policy, available on the Company's website at www.ldvsouthafrica.co.za. The Company's purposes for processing personal information include:

- Providing quotes and responding to client and prospective client enquiries.
- Processing applications for products and services.
- Verifying client identities.
- Managing a database of clients and prospective clients.
- Inviting clients to events and sending updates on Company products and services.
- Sending marketing material with appropriate consent.
- Staff administration and human resources management.
- Maintaining accounting records and complying with applicable tax and other laws.

9. Categories of Data Subjects and Personal Information

Data Subject Category	Personal Information Processed
Natural Persons (clients, members of the public)	Full name; contact details; physical and postal address; date of birth; identity number; passport number; tax-related information; nationality; gender; confidential correspondence
Juristic Persons / Entities	Names of contact persons; name of legal entity; physical and postal address; contact details; financial information; registration number; founding documents; tax-related information; authorised signatories; ultimate beneficial owners
Contracted Service Providers	Names of contact persons; name of legal entity; address; contact details; financial information; registration number; founding documents; tax information; authorised signatories; ultimate beneficial owners
Employees, Directors and Officers	Full name; identity number; gender; marital status; ethnicity; age; home language; education; financial information; employment history; physical address; contact details; criminal history (where applicable); health and wellbeing information

10. Categories of Recipients for Processing

The Company may share personal information with the following categories of service providers for the purposes set out in clause 8:

- Data capturing and data organisation service providers.
- Data storage and cloud computing providers (all data stored within South Africa where practicable).
- Email and electronic communications service providers.
- Due diligence and compliance service providers.
- Product and service delivery partners.
- Administrative and operational support service providers.

11. Trans-Border Flows of Personal Information

There are no planned routine trans-border flows of personal information. All personal information is stored in a secured environment within South Africa where practicable.

The Company may from time to time engage with foreign-based clients or service providers, or be required to share information with foreign-based regulators on an ad hoc basis. Any such transfer will only take place in accordance with section 72 of POPIA and the Company's POPIA Policy.

12. Information Security Measures

The Company implements the following security measures to protect personal information in its possession:

- All electronic data transmitted to and from the Company is encrypted.
- Computer systems are protected by anti-virus and anti-malware software.
- Access to systems and data is restricted by password controls and role-based permissions.
- Physical records are managed securely on site and during transportation using standard operating procedures to prevent unauthorised access.
- Physical records no longer required are destroyed by cross-shredding on site.
- Third-party service providers who process personal information on behalf of the Company are contracted to implement appropriate security controls and are subject to audit.
- Confidentiality and non-disclosure agreements are in place with relevant staff and service providers.
- Physical access to Company premises and server rooms is controlled.

13. Availability of this Manual

This Manual is available for inspection, free of charge:

- At the offices of the Company: Block A, 4 Pieter Wenning Road, Sandton, Gauteng, 2191.
- At the Training Centre: 33 Galaxy Avenue, Linbro Business Park, Sandton, Gauteng.
- On the Company's website at www.ldvsouthafrica.co.za.

A copy of this Manual will be provided to any person who requests it, on payment of a reasonable fee for copying and administration.

14. Form: Request for Access to Record of Private Body

(Section 53(1) of the Promotion of Access to Information Act No. 2 of 2000 — Regulation 10)
Completed forms must be submitted to the Information Officer at the contact details set out in clause 3 of this Manual.

A. Particulars of Private Body

The Head: Africa Automotive Holdings (Pty) Ltd t/a LDV South Africa, Block A, 4 Pieter Wenning Road, Sandton, Gauteng, 2191

B. Particulars of Person Requesting Access

Full names and surname: _____

Identity number: _____

Postal address: _____

Telephone number: (_____) _____

Email address: _____

Capacity in which request is made (if on behalf of another): _____

C. Particulars of Person on Whose Behalf Request is Made (if applicable)

Full names and surname: _____

Identity number: _____

D. Particulars of Record Requested

Description of record or relevant part of record:

Reference number (if known): _____

Any further particulars: _____

E. Fees

Requests for access to records (other than your own personal information) will be processed only after payment of the applicable request fee. You will be notified of the amount required. If you qualify for exemption from fees, please state the reason:

Reason for fee exemption (if applicable): _____

F. Form of Access Requested

Please indicate the form in which you require access to the record (mark the appropriate box):

☐ Copy of written/printed record ☐ Inspection of written/printed record

☐ Copy of visual images ☐ View visual images

☐ Listen to audio recording ☐ Transcription of audio recording

☐ Printed copy of electronic record ☐ Copy in electronic/computer-readable form

If prevented by disability from accessing the record in the above forms, please describe your disability and preferred format: _____

G. Particulars of Right to Be Exercised or Protected

Indicate which right is to be exercised or protected: _____

Explain why the record is required for the exercise or protection of that right: _____

H. Notice of Decision

You will be notified in writing whether your request has been approved or denied. Indicate how you would prefer to be informed: _____

Signed at _____ on this _____ day of _____ 20____.

Signature: _____

Full name: _____

Capacity: _____
