GROUP FIVE LIMITED

(Registration Number: 1969/000032/06)

PROMOTION OF ACCESS TO INFORMATION MANUAL

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

Version	1.1
Effective Date	30 June 2026
Supersedes	Version issued during Business Rescue proceedings (2021)
Review Date	Annually (by 30 June 2027)
Approved By	Director of the Company under the authority of the Joint Business Rescue Practitioners
Information Officer	Anthony John Clacher
Designation	Chief Financial Officer and Director

DOCUMENT CONTROL

Document Title	PAIA Manual
Legislation	Promotion of Access to Information Act, 2000
Applicable To	All Directors, Officers, Contractors and Service Providers
Version	1.1
Effective Date	30 June 2026
Review Date	Annually
Approved By	Director of the Company under the authority of the Joint Business Rescue Practitioners
Owner	Information Officer

VERSION CONTROL

Version	Date	Description of Change	Approved By
1.0	2021	Initial issue on exit from Business Rescue proceedings	Director
1.1	30 June 2026	Enhanced version — expanded legislation list, additional record categories (property, IP, insurance, administration, taxation), full prescribed fee schedule, enhanced request procedure with third-party notification and extension provisions, enhanced grounds for refusal, Form C included as annexure	Director

APPROVAL

This Manual has been approved by the Director of Group Five Limited, under the authority of the Joint Business Rescue Practitioners and shall remain effective until amended, withdrawn, or replaced.

Signed at Senderwood on this 29th day of June 2026.

Director: Anthony John Clacher

Signature: ______________________

Date: 29 June 2026

1. INTRODUCTION

The Promotion of Access to Information Act, 2000 ("PAIA") gives effect to the constitutional right of access to information held by public and private bodies where such information is required for the exercise or protection of any rights.

This Manual has been prepared in accordance with Section 51 of PAIA and provides information regarding the records held by Group Five Limited ("the Company") and the procedures that must be followed to request access to such records.

This Manual also incorporates relevant provisions of the Protection of Personal Information Act, 2013 ("POPIA") insofar as they relate to access to personal information and the processing of personal information by the Company.

Note: As at the effective date of this Manual, the Company is exiting Business Rescue proceedings commenced on 11 March 2019 in accordance with Chapter 6 of the Companies Act 71 of 2008, with formal termination anticipated on or about 30 June 2026. Group Five Limited is the investment holding company and 100% shareholder of Group Five Construction Proprietary Limited (Registration Number: 1974/003166/07), which has its own separate PAIA Manual.

2. PURPOSE OF THE MANUAL

The purpose of this Manual is to:

- Promote transparency, accountability and effective governance;
- Facilitate requests for access to records held by the Company;
- Provide guidance on how to submit requests for information;
- Describe the categories of records held by the Company;
- Inform data subjects of their rights under POPIA;
- Promote compliance with applicable legislation;
- Enable persons to understand the nature of records maintained by the Company.

3. SCOPE AND APPLICATION

This Manual applies to all directors, officers, consultants, contractors and service providers of the Company. As an investment holding company, Group Five Limited does not employ operational staff directly. As at the effective date of this Manual, the Company has one employee, being the Director.

The provisions of this Manual apply to:

- Current records;
- Historical records (including records pre-dating Business Rescue proceedings);
- Electronic records;
- Physical records;
- Personal information;
- Financial, legal and shareholder records;
- Records held in connection with subsidiary entities.

Nothing in this Manual shall limit any statutory rights available to any person under applicable legislation.

4. DEFINITIONS

Unless otherwise indicated, words and expressions used in this Manual shall bear the meanings assigned to them in PAIA and POPIA.

Term	Definition
Company	Group Five Limited (Registration Number: 1969/000032/06).
Data Subject	The person to whom personal information relates.
Information Officer	The person designated in terms of PAIA and POPIA — Anthony John Clacher.
PAIA	Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).
Personal Information	Information relating to an identifiable living natural person and, where applicable, an identifiable juristic person.
POPIA	Protection of Personal Information Act, 2013 (Act No. 4 of 2013).
Record	Any recorded information regardless of form or medium.
Requester	Any person requesting access to a record.
Subsidiary	Group Five Construction Proprietary Limited (Registration Number: 1974/003166/07) and associated group entities.
Third Party	Any person other than the requester or the Company.

5. COMPANY INFORMATION

5.1 Introduction

This Manual applies to all operations, records and affairs of Group Five Limited. The Company is a duly incorporated public company that was listed on the Johannesburg Stock Exchange ("JSE") under share code GRF (ISIN: ZAE000027405) from 1974 until the suspension of its listing on 11 March 2019. It operates in accordance with the laws of the Republic of South Africa.

5.2 Registered Particulars

Registered Name	Group Five Limited
Registration Number	1969/000032/06
VAT Number	Not applicable — VAT deregistered
Income Tax Reference Number	9625077715
Date of Incorporation	2 January 1969
Nature of Entity	Public Company (Limited)
Industry Sector	Investment Holding Company
Financial Year End	30 June
JSE Share Code	GRF (suspended 11 March 2019)
ISIN	ZAE000027405

5.3 Registered Office and Contact Details

Registered Address	Building 14, Block B, Byls Bridge Office Park Cnr Olievenhoutbosch Road and Jean Avenue Centurion, 0157
Principal Place of Business	Building 14, Block B, Byls Bridge Office Park Cnr Olievenhoutbosch Road and Jean Avenue Centurion, 0157
Postal Address	Postnet Suite 500, Private Bag X26 Sunninghill, 2157
Email Address	info@groupfive.co.za
Website	www.groupfive.co.za

5.4 Company Overview and History

Incorporation and Listing (1969–1978)

Group Five Limited was incorporated on 2 January 1969 as an investment holding company with interests in construction, engineering, manufacturing and property. Although the group had existed since late 1973 and was listed on the JSE in May 1974 under share code GRF, it started out as a very loose confederation and only established its corporate headquarters in 1978.

Early Expansion and Consolidation (1978–2005)

Through the 1980s and 1990s the group undertook strategic acquisitions and corporate restructurings, progressively consolidating construction, manufacturing and related services operations under the Group Five Limited holding structure. Key milestones included entry into manufacturing, expansion into the Middle East and sub-Saharan Africa, a three-year restructuring programme, and the finalisation of the BEE transaction.

Peak Growth Era (2006–2016)

The group's secured order book grew by 76% to R8.5 billion. The group became one of only seven JSE-listed companies to maintain Best Performer status for four consecutive years on the JSE's Socially Responsible Investment index. At its peak the group operated in over 28 countries employing more than 12,000 people.

Notable projects included the Moses Mabhida Stadium, A1 Motorway in Poland, Spring Grove Dam, and Nelson Mandela Children's Hospital.

Financial Distress and Business Rescue (2016–2019)

From 2016 the group experienced deteriorating market conditions, operating losses and cash flow pressures, exacerbated by the termination of the Kpone power plant project in Ghana in November 2017, which triggered payment demands of approximately $106.5 million under financial guarantees. On 11 March 2019 the board resolved to place both Group Five Limited and Group Five Construction Proprietary Limited into Business Rescue, with DAC Lake and PF van den Steen appointed as Joint Business Rescue Practitioners.

Business Rescue Outcome and Exit (2019–2026)

The Business Rescue process delivered an exceptional outcome. All creditor classes of Group Five Construction Proprietary Limited were repaid in full at 100 cents in the Rand:

Creditor Class	Original Estimate	Actual Recovery
Secured Creditors	65c in the Rand (Liquidation distribution estimate)	**100c in the Rand**
Concurrent Creditors	3.4c in the Rand (Liquidation distribution estimate)	**100c in the Rand**
Preferent Creditors	—	**100c in the Rand**
Post-Commencement Financiers	—	**100c in the Rand**

The BRPs confirm there is likely to be a residual positive net asset value in Group Five Construction Proprietary Limited, with positive value consequently available to the shareholders of Group Five Limited. Formal termination of Business Rescue proceedings for both entities is anticipated on or about 30 June 2026.

5.5 Vision, Mission and Values

Vision

Following the successful conclusion of its Business Rescue proceedings, the Company's reconstituted Board of Directors will focus on managing the post Business Rescue environment, responsibly concluding the remaining outstanding matters, maintaining appropriate oversight and governance, and ensuring that all residual obligations are managed prudently on behalf of stakeholders.

Mission

The Company's mission statement will be developed and formally adopted by the Board of Directors and shareholders following exit from Business Rescue, agreed upon by the new governance structures of the Company, aligned to the outstanding matters on termination of the Business Rescue process.

Core Values

Group Five Limited carries forward from its 50-year heritage a foundation of values that will continue to guide the Company's conduct. These will be formally reviewed and confirmed by the Board following exit from Business Rescue:

- Integrity and ethical conduct in all business dealings;
- Accountability to shareholders, employees, and stakeholders;
- Safety of people and the environment;
- Excellence in all activities;
- Professional management of post Business Rescue Matters;
- Responsible corporate citizenship.

5.6 Business Activities

Group Five Limited is an investment holding company that did not trade directly. All operational activities were conducted through its subsidiaries, principally Group Five Construction Proprietary Limited. As at the effective date of this Manual, the Company is in administrative wind-down status. Future activities, if any, will be determined by the reconstituted Board of Directors and shareholders following exit from Business Rescue.

5.7 Geographical Footprint

Location	Province	Function
Boardwalk Office Park, Block 10 First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043	Gauteng	Administrative / Information Officer

5.8 Corporate Structure

Nature of Company

Group Five Limited is the ultimate holding company of the group, holding 100% of Group Five Construction Proprietary Limited (Registration Number: 1974/003166/07). Both entities are in Business Rescue proceedings being terminated simultaneously. The BRPs are appointing temporary boards of directors to both entities and updating the share register of Group Five Limited as part of the termination process.

Group Wind-Down

At commencement of Business Rescue in March 2019, there were 179 companies in the group (85 international, 94 local). As at May 2026, 54 entities remain (31 international, 23 local), all subject to ongoing wind-down, liquidation or deregistration processes.

Share Register

The share register of Group Five Limited is in the process of being updated by management with the assistance of Computershare. The Company's shares have been suspended on the JSE since 11 March 2019.

5.9 Organisational Structure

Director / Acting CEO	Anthony John Clacher (Chief Financial Officer)
Management Committee	4-member committee covering finance, operations, HR and legal functions (shared with Group Five Construction Proprietary Limited)
Total Employees	1 (the Director)

The post-rescue Board of Directors will determine the appropriate governance and management structure following exit from Business Rescue.

5.10 Governance Structure

As at the effective date of this Manual, the Company operates under the authority of the Joint Business Rescue Practitioners and a single Director. Board Committees are not currently operational and will be reconstituted by the new Board following exit from Business Rescue. Confirmation of the formal termination of the BRPs' mandate is expected 30 June 2026.

5.11 Information Systems

System	Description
JD Edwards (Oracle)	Enterprise Resource Planning (ERP) system
Axiopay	External payroll processing system
Packman	Document management and project records system
SharePoint	Server-based document management and collaboration platform

PeopleSoft	Server-based Human Resources management system

The Company does not currently utilise cloud-based platforms.

5.12 Regulatory Environment

- Companies and Intellectual Property Commission (CIPC)
- South African Revenue Service (SARS)
- Information Regulator (South Africa)
- JSE Limited — shares suspended since 11 March 2019; listing status subject to outcome of Business Rescue proceedings
- Financial Intelligence Centre — where applicable

As an investment holding company, the Company is not subject to CIDB or NHBRC requirements. No specific regulatory conditions have been imposed on the Company as a result of the Business Rescue proceedings beyond those applicable to all companies in Business Rescue under the Companies Act.

5.13 Contact Details for PAIA Purposes

Information Officer	Anthony John Clacher
Designation	Chief Financial Officer and Director
Email	companysecretary@groupfive.co.za
Physical Address	Boardwalk Office Park, Block 10, First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043
Postal Address	Boardwalk Office Park, Block 10, First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043

6. INFORMATION OFFICER

The Information Officer appointed in terms of PAIA and POPIA is responsible for ensuring compliance with PAIA and POPIA, managing requests for access to records, monitoring privacy obligations, liaising with the Information Regulator, maintaining this Manual, and promoting awareness.

Full Name	Anthony John Clacher
Designation	Chief Financial Officer and Director
Email	companysecretary@groupfive.co.za
Physical Address	Boardwalk Office Park, Block 10, First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043

No Deputy Information Officer has been appointed at this time.

7. GUIDE ON HOW TO USE PAIA

A guide on how to use PAIA is available from the Information Regulator (South Africa), which was previously maintained by the South African Human Rights Commission. The Guide contains information regarding the purpose of PAIA, how to submit requests, prescribed fees, and available remedies.

Body	Information Regulator (South Africa)
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
General Enquiries	enquiries@inforegulator.org.za
Complaints	complaints.IR@justice.gov.za
Website	www.inforegulator.org.za

8. RECORDS AUTOMATICALLY AVAILABLE WITHOUT A FORMAL REQUEST

The following categories of records may be made available without a formal PAIA request, subject to operational requirements and applicable restrictions:

- Publicly available company information and corporate profiles;
- Public announcements and public website information;
- Historic JSE SENS announcements (publicly available);
- Public compliance certificates, CIPC filings and registrations;
- Public notices.

Availability of such records remains subject to the Company's discretion and applicable legal requirements. The submission of a request under PAIA is not required for the above categories.

9. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The Company holds records in accordance with various South African laws, including but not limited to the following:

Constitutional and Administrative

- Constitution of the Republic of South Africa, 1996
- Public Protector Act 23 of 1994
- Promotion of Access to Information Act 2 of 2000

Corporate and Securities Legislation

- Companies Act 71 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Prevention and Combatting of Corrupt Activities Act 12 of 2004
- Prevention of Organised Crime Act 121 of 1998
- Competition Act 89 of 1998
- Standards Act 8 of 2008

Securities and JSE Legislation (Historical)

- Financial Markets Act 19 of 2012
- Financial Sector Regulations Act 9 of 2017
- Financial Services Board Act 97 of 1990
- JSE Listings Requirements (applicable during listing period 1974–2019)

Tax Legislation

- Income Tax Act 58 of 1962
- Tax Administration Act 28 of 2011
- Customs and Excise Act 91 of 1964 (where applicable)

Employment Legislation

- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Skills Development Act 97 of 1998
- Unemployment Insurance Act 63 of 2001
- Pension Funds Act 2 of 1956
- Protected Disclosures Act 26 of 2000

Financial Services and Insurance Legislation

- Financial Advisory and Intermediary Services Act 37 of 2002
- Short Term Insurance Act 53 of 1998
- Insurance Act 18 of 2017

Information and Privacy Legislation

- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- Postal Services Act 124 of 1998

Security Legislation

- Protection of Constitutional Democracy Against Terrorist and Related Activities Act 33 of 2004

This list is not exhaustive. Records may be held and retained in accordance with any applicable legislation not listed above. The list may be amended from time to time.

10. CATEGORIES OF RECORDS HELD BY THE COMPANY

The Company maintains records predominantly in electronic format. Given the Company's history and Business Rescue proceedings, records span the period from incorporation in 1969 to the present date. These categories are a general indication and do not guarantee that access will be granted. The records, as listed, are available as appropriate following the Business Rescue process.

10.1 Company Secretarial and Governance Records

- Memorandum of Incorporation / Articles of Association and Company statutes
- Share registers, securities registers and beneficial ownership registers
- Director registers
- Minutes of board and shareholder meetings
- Statutory returns
- Powers of Attorney
- Share certificates
- CIPC filings
- Annual reports and integrated reports (pre-rescue)
- JSE SENS announcements and investor communications (historical)
- Business Rescue Plans and related statutory documentation
- Business Rescue status reports (March 2019 to date)

10.2 Movable and Immovable Property

- Title deeds
- Lease agreements
- Hire agreements and hire-purchase agreements
- Credit sale agreements and ordinary and conditional sale agreements
- Property valuation records

10.3 Intellectual Property

- Trademarks
- Patents
- Copyrights
- Designs
- Know-how and proprietary methodologies
- Licensing agreements

10.4 Insurance

- Insurance policies
- Insurance claim files
- Insurance correspondence
- Risk assessment records

10.5 Taxation

- Income tax files and returns
- Tax Administration Act correspondence
- SARS correspondence and assessments
- Tax year-end workings and supporting documentation

10.6 Financial Records

- Annual Financial Statements
- Management accounts
- General ledger records
- Banking details and bank account records

- Debtors / creditors statements
- Investment and intercompany loan records
- Loan agreements
- Business Rescue distribution and creditor payment records
- Audit files
- Accounting policies

10.7 Shareholder and Investor Records

- Shareholder communications
- Investor relations records
- JSE correspondence (historical)
- Share scheme records
- Proxy records
- Beneficial ownership records

10.8 Legal Records

- Contracts and service level agreements
- Non-disclosure agreements
- Litigation records
- Legal opinions
- Settlement agreements
- Arbitration records
- Regulatory correspondence
- Insurance claims
- Business Rescue-related legal documentation
- Kpone project-related legal and claims documentation

10.9 Human Resources Records

- Employee personnel file (current Director)
- Employment contract
- Payroll records
- Historic employment records for former employees
- Policies and procedures

10.10 Information Technology Records

- System documentation and manuals
- Project, disaster recovery and implementation plans
- Licensing documentation
- System access logs
- User account records
- Security reports
- Backup and disaster recovery records

10.11 Administration Records

- Intranet content and policies
- Correspondence with internal and external parties
- Internal communications

11. PROCESSING OF PERSONAL INFORMATION

11.1 Introduction

The Company is committed to processing personal information lawfully, reasonably and transparently in accordance with POPIA. As an investment holding company with minimal direct employees, the scope of personal information processed directly by the Company is limited compared to an operational entity.

11.2 Personal Information Processed

- Full names, identity numbers of directors and officers;
- Contact details (address, email, telephone);
- Shareholder information and beneficial ownership records;
- Financial information relating to directors and shareholders;
- Employment information relating to the Director;
- Electronic information (IP addresses, login records, usernames).

11.3 Categories of Data Subjects

- Directors and officers;
- Shareholders and beneficial owners;
- Investors;
- Employees (current and former);
- Suppliers and service providers;
- Regulatory authorities.

11.4 Purposes for Processing

- Corporate governance and shareholder administration;
- Regulatory compliance and tax administration;
- Business Rescue administration and creditor management;
- Legal proceedings and dispute resolution;
- Information technology administration;
- Employment administration.

11.5 Security Safeguards

Security measures include physical access controls, electronic security (firewalls, encryption, password controls, secure backups) and administrative controls (policies, confidentiality agreements, access control procedures).

11.6 Personal Information Breaches

Where reasonable grounds exist to believe that personal information has been accessed by an unauthorised person, the Company shall investigate, take corrective action, notify affected parties and the Information Regulator where required by law, and maintain incident records.

11.7 Retention and Destruction

Records shall be retained in accordance with the Retention Schedule at Annexure C. Records from the Business Rescue period (March 2019 – June 2026) are being managed in accordance with directions from the Business Rescue Practitioners on exit. Transfer of records custodianship will be confirmed following formal termination of proceedings.

Where personal information is no longer required, it shall be destroyed by secure shredding, secure deletion, physical destruction or permanent electronic erasure, with appropriate destruction records maintained.

11.8 Rights of Data Subjects

Subject to applicable legislation, data subjects may request access to, correction of, or deletion of personal information; object to certain processing activities; withdraw consent; lodge complaints with the Information Regulator; and institute civil proceedings where permitted by law.

12. REQUEST PROCEDURE FOR ACCESS TO RECORDS

12.1 Right of Access

Any person may request access to records held by the Company where such access is required for the exercise or protection of any rights, subject to PAIA. Each request shall be considered on its own merits. Submission of a request does not automatically entitle the requester to access.

12.2 Submission of a Request

The requester must make use of the prescribed request form (Form C — see Annexure H) to request access to a record. The completed form must be addressed to the Information Officer and submitted to:

By Email	companysecretary@groupfive.co.za
By Hand Delivery	Boardwalk Office Park, Block 10, First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043
By Post	Boardwalk Office Park, Block 10, First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043

The Company may request proof of identity before processing any request. The applicable fee schedule is set out in Chapter 13 of this Manual and shall be paid before access to a record will be permitted.

12.3 Information Required in a Request

The request must contain sufficient detail to enable identification of the requester (full names, identity or registration number, postal address, telephone number and email address), a description of the record requested, the right being exercised or protected and why the requested information is required for the exercise or protection of that right, and the preferred form of access.

Where a request is submitted on behalf of another person, the requester must submit proof of capacity (Power of Attorney, Letters of Authority, Board Resolution or written mandate). The Company reserves the right to verify such authority.

12.4 Assistance to Requesters

Where a requester is unable to complete the prescribed form due to illiteracy, disability or any other valid reason, the Information Officer shall provide reasonable assistance. Such assistance shall not create an obligation to grant access to records.

12.5 Processing of Requests — Steps

Step	Action
1	Acknowledge receipt of the request.
2	Verify the identity and authority of the requester.
3	Determine whether the requested record exists and is held by the Company.
4	Assess whether grounds for refusal apply.
5	Determine whether third-party consultation is required (see clause 12.6).
6	Communicate the outcome of the request in writing within the prescribed period.

12.6 Third-Party Notification

Where a requested record contains information relating to a third party, the Information Officer must take all reasonable steps to notify that third party of the request within 21 (twenty-one) days of receipt of the request.

The third party may, within 21 (twenty-one) days of such notification, make representations to the Information Officer as to why access should be granted or refused. The Information Officer shall consider all representations before making a decision. The third party must be informed of the decision taken.

12.7 Time Period for Response

The Company shall notify the requester of its decision within 30 (thirty) days of receipt of the request, unless an extension is required. The notification will indicate whether access has been granted or refused, and applicable fees.

The 30-day period may be extended by a further period not exceeding 30 (thirty) days where:

- The requester consents to the extension in writing; or
- The request is for a large number of records, or requires a search through a large number of records, and compliance with the original 30-day period would unreasonably interfere with the Company's activities.

Should the period be extended, the requester must be notified within the initial 30-day period. The notice must state adequate reasons for the extension, the period of the extension, and the procedure available to the requester should they wish to lodge an application to court against the extension.

Should the Information Officer fail to respond within the 30-day period, such failure shall constitute a deemed refusal of the request.

12.8 Form of Access

Where access is granted, records may be provided by inspection at the Company's premises, printed or photocopied copies, electronic copies (PDF or other available format), email transmission, or provision of audio/visual records or transcripts where available.

12.9 Records That Cannot Be Found

If the Company has searched for a record and it is believed that the record does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation signed by the Information Officer explaining the steps taken to locate the record and why it cannot be found. This notice is deemed to be a refusal of the request for purposes of PAIA.

If, after such notice is given, the record is subsequently found, the requester must be given access thereto unless a ground for refusal of access exists.

12.10 Record of Requests

The Information Officer shall maintain a register of all PAIA requests received, recording the reference number, date received, requester details, nature of request, decision taken, date finalised, fees charged, and outcome.

13. FEES PAYABLE IN TERMS OF PAIA

Fees payable in respect of requests for access to records are determined in accordance with PAIA and the Regulations published thereunder. The following prescribed fee schedule applies as at the effective date of this Manual. Requesters are advised to consult the Information Regulator for any revisions. (https://inforegulator.org.za/paia-fees-structure-2/)

	Description	Prescribed Fee
7.1	Copy of this Manual (per A4 page or part thereof)	R2.00
7.2	**REPRODUCTION FEES**	
7.2.1	Photocopy of A4 page or part thereof	R2.00
7.2.2	Printed copy of A4 page (held on computer or electronic/machine-readable form)	R40.00
7.2.3	Copy in computer-readable form on compact disc	R70.00
7.2.4(a)	Transcription of visual images — per A4 page or part thereof	Costs as per outsourced service provider
7.2.4(b)	Copy of visual images	Costs as per outsourced service provider
7.2.5(a)	Transcription of audio record — per A4 page or part thereof	R24.00 per page
7.2.5(b)	Copy of audio record	R40.00
7.3	**REQUEST FEE (requesters other than personal requesters)**	**R50.00**
7.4	**ACCESS FEES (search and preparation)**	
7.4.1	To search for and prepare the record for disclosure — per hour or part thereof	R145.00/hour. Max R435.00
7.4.2	DEPOSIT: Threshold — 6 hours of search/preparation time exceeded. Deposit = one-third of the access fee.	1/3 of amount per request. It is calculated interns of amounts above
7.4.3	Postage — where a copy of a record must be posted to a requester	Actual cost

Notes on fees:

- A request for access to a record, other than a record containing personal information about the requester personally, will be processed only after the request fee has been paid.
- If you qualify for exemption from payment of any fee, please state the reason for exemption in your request.
- Payment may be made by Electronic Funds Transfer (EFT), bank deposit, or any other payment method approved by the Company.
- Proof of payment must accompany the request where required.
- No access shall be granted until all applicable fees have been paid.
- Certain requesters may be exempt from fees where provided for by law.
- Where the estimated cost of processing a request is likely to exceed the deposit threshold, the Company may require payment of a deposit (one-third of the estimated access fee) before the request is processed further.
- References to fees in this Manual shall automatically be deemed to refer to the latest fees prescribed under PAIA and its Regulations.

14. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

14.1 General

Access may be refused only where authorised or required by PAIA. Written reasons will be provided for any refusal. Section 9 of the Act recognises that the right of access to information cannot be unlimited and should be subject to justifiable limitations, including limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, in a manner which balances that right with other rights, including those in the Bill of Rights.

14.2 Mandatory Protection of Personal Information

Access shall be refused where disclosure would involve the unreasonable disclosure of personal information relating to a natural person, including shareholder personal information — unless consent has been obtained, disclosure is required by law, or an applicable exception exists.

14.3 Protection of Confidential Commercial Information of Third Parties

Access may be refused where records contain:

- Trade secrets of a third party;
- Financial, commercial, scientific or technical information of a third party, disclosure of which could reasonably be expected to harm the financial or commercial interests of that third party;
- Information disclosed in confidence by a third party to the Company, if disclosure could put that third party at a disadvantage in negotiations or prejudice that third party in commercial competition.

14.4 Protection of Confidential Information of the Company

Access may be refused where records contain:

- Trade secrets of the Company;
- Financial, commercial, scientific or technical information, disclosure of which could reasonably be expected to harm the financial or commercial interests of the Company;
- Information which, if disclosed, could put the Company at a disadvantage in negotiations or commercial competition;
- A computer program owned by the Company and protected by copyright.

14.5 Protection of Safety of Individuals and Property

Access may be refused where disclosure could reasonably be expected to endanger the life or physical safety of any person, facilitate criminal activity, expose security measures, or endanger Company assets or information systems.

14.6 Privileged Records

Access may be refused for legally privileged records, including attorney-client communications, legal advice, litigation documents, counsel opinions, and settlement discussions. Privilege shall not be waived merely because a request is submitted.

14.7 Research Information

Access may be refused where disclosure would reveal the identity of the Company, a researcher or the subject matter of ongoing research and would place that research at a serious disadvantage.

14.8 Business Rescue, Litigation and Shareholder Records

Certain records generated during or in connection with Business Rescue proceedings, including litigation and dispute resolution records, and records related to shareholder rights and securities transactions, may be subject to additional confidentiality and privilege considerations.

14.9 Information Subject to Confidentiality Obligations

Access may be refused where disclosure would constitute a breach of contractual confidentiality obligations, non-disclosure agreements, statutory confidentiality requirements, or court orders.

14.10 Frivolous or Vexatious Requests

Requests that are manifestly frivolous or vexatious, involve an unreasonable diversion of Company resources, or constitute an abuse of rights may be refused. Each request shall be assessed on its own merits.

14.11 Records Not Held by the Company

The Company cannot provide access to records that do not exist, cannot be located after reasonable searches, or are not held by the Company. The requester shall be informed accordingly by affidavit or affirmation.

14.12 Mandatory Disclosure in the Public Interest

Notwithstanding any other provision, access to a record may be granted where disclosure would reveal evidence of a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs any harm contemplated. Each matter shall be considered individually.

14.13 Partial Disclosure

Where only part of a record is protected, the Company may sever protected portions and provide access to the remainder of the record.

14.14 Written Notice of Refusal

Where access is refused, the Company shall provide written notice setting out the decision, reasons for refusal, the provisions of PAIA relied upon, available remedies, and information regarding complaints to the Information Regulator.

15. REMEDIES AVAILABLE TO REQUESTERS

15.1 General

The Company aims to process all requests fairly, consistently and in accordance with PAIA.

15.2 Complaints to the Information Regulator

Information Regulator	Republic of South Africa
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
General Enquiries	enquiries@inforegulator.org.za
Complaints	complaints.IR@justice.gov.za
Website	www.inforegulator.org.za

15.3 Judicial Remedies

A requester may apply to a court of competent jurisdiction for appropriate relief, including confirming or setting aside a decision, ordering disclosure of records, granting an interdict, awarding costs, or granting any other appropriate relief.

16. AVAILABILITY OF THIS MANUAL

Method	Details
Intranet / Email Distribution	The Manual is distributed internally and made available to affected persons via email on request.
Physical Inspection	Boardwalk Office Park, Block 10, First Floor Suite 13, 107 Haymeadow Street, Faerie Glen, 0043 (during normal business hours).
Information Officer	A copy may be requested from the Information Officer at companysecretary@groupfive.co.za.

This Manual is published in English.

17. REVIEW AND AMENDMENT OF THE MANUAL

This Manual shall be reviewed at least annually by the Information Officer to ensure continued compliance with PAIA, POPIA, applicable regulations and guidance. The first scheduled review date is 30 June 2027. The Manual shall also be reviewed on the occurrence of legislative amendments, material change in Company operations, reconstitution of the Board of Directors, or significant compliance findings. Any material amendment shall be approved by the Board of Directors.

CERTIFICATION

I hereby certify that this Manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 and reflects the Company's current approach to access to information and the protection of personal information.

Information Officer

Name: Anthony John Clacher

Designation: Chief Financial Officer and Director

Signature: ______________________________

Date: 30 June 2026

Approved by the Director under the authority of the Joint Business Rescue Practitioners

Name: Anthony John Clacher

Designation: Director / Chief Financial Officer

Signature: ______________________________

Date: 29 June 2026

ANNEXURE A — INFORMATION OFFICER DETAILS

Company Name	Group Five Limited
Registration Number	1969/000032/06
Information Officer	Anthony John Clacher
Designation	Chief Financial Officer and Director
Email Address	companysecretary@groupfive.co.za
Physical Address	Boardwalk Office Park, Block 10, First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043
Postal Address	Boardwalk Office Park, Block 10, First Floor Suite 13 107 Haymeadow Street, Faerie Glen, 0043

ANNEXURE B — REQUEST FOR ACCESS TO RECORDS

Requests must be submitted using the prescribed Form C as contained in Annexure H of this Manual or the latest prescribed form published under PAIA from time to time. The applicable fees must be paid before access to a record will be permitted. The prescribed form may also be obtained from the Information Regulator (www.inforegulator.org.za) or from the Company's Information Officer.

ANNEXURE C — RECORD RETENTION AND DESTRUCTION SCHEDULE

1. Purpose

This Schedule ensures compliance with applicable legislation and promotes effective records management. Records shall not be destroyed where litigation is pending, an investigation is underway, a regulatory enquiry is ongoing, a preservation order exists, or the record is required by law.

2. Retention Schedule

Corporate Governance Records

Record Type	Minimum Retention
Memorandum of Incorporation / Articles of Association	Permanent
Share Registers and Securities Registers	Permanent
Beneficial Ownership Registers	Permanent
Board Minutes and Resolutions	Permanent
Annual Reports and Integrated Reports	Permanent
CIPC Filings	Permanent
JSE SENS Announcements (historical)	Permanent
Business Rescue Plans and statutory documentation	Permanent
Business Rescue Status Reports	Permanent
Statutory Registers	Permanent

Financial Records

Record Type	Minimum Retention
Annual Financial Statements	Permanent
General Ledger	7 Years
Banking Records	7 Years
Income Tax Returns	5 Years after submission
Business Rescue distribution records	Permanent
Intercompany loan records	Permanent

Legal, Insurance and Property Records

Record Type	Minimum Retention
Contracts	Contract Term + 7 Years
Litigation Files	Matter Closed + 10 Years
Legal Opinions	Permanent
Settlement Agreements	Permanent
Insurance Policies	Duration + 5 Years
Insurance Claim Files	Resolution + 5 Years

Title Deeds	Duration of ownership + 10 Years
Lease Agreements	Duration + 5 Years
Business Rescue litigation files	Matter Closed + 10 Years

Information Technology Records

Record Type	Minimum Retention
Access Logs	12 Months
Security Logs	12 Months
Incident Reports	5 Years
Software Licence Records	Licence Term + 3 Years

3. Approved Methods of Destruction

- Physical: cross-cut shredding, secure destruction services, incineration by authorised providers
- Electronic: secure deletion, data wiping, cryptographic erasure, physical destruction of storage media

4. Record of Destruction

A Destruction Register shall be maintained recording: description of records destroyed, date of destruction, method used, authorising person, and service provider if applicable.

ANNEXURE D — DATA SUBJECT RIGHTS PROCEDURE

A data subject may exercise the following rights by submitting a request to the Information Officer:

Right	Description
Right of Access	Request access to personal information held by the Company.
Right to Correction	Request correction of inaccurate or outdated information.
Right to Deletion	Request deletion of personal information where lawfully permitted.
Right to Object	Object to certain forms of processing.
Right to Withdraw Consent	Withdraw consent where processing is based on consent.
Right to Complain	Lodge a complaint with the Information Regulator.

ANNEXURE E — APPOINTMENT OF INFORMATION OFFICER

Director Resolution

Anthony John Clacher
in his capacity as Chief Financial Officer and Director
is hereby appointed as the Information Officer of:
Group Five Limited
with responsibility for PAIA compliance, POPIA compliance, Information Regulator liaison, management of information requests, and monitoring privacy compliance.

Effective Date: 30 June 2026

Director: Anthony John Clacher
Signature: ____________________________
Date: 29 June 2026

ANNEXURE F — ANNUAL PAIA COMPLIANCE CHECKLIST

Requirement	Yes	No	Comments
Manual reviewed annually	x		
Information Officer appointed	x		
Deputy Information Officer appointed (or confirmed not required)	N/A		
PAIA requests register maintained	x		
Refusal register maintained	x		
POPIA controls reviewed	x		
Retention schedule reviewed	x		
Information assets reviewed	x		
Breach register reviewed	x		
Business Rescue records custodianship confirmed (first review only)	In progress		
Share register updated and confirmed (first review only)	x		Being updated by Computershare
Board of Directors reconstituted and governance framework updated (first review only)	In progress		
JSE listing status confirmed (first review only)	Delisting confirmed		
Fee schedule checked against latest PAIA regulations	x		

Completed By: _____Christo Botha___________

Date: _____30/6/2026________

Approved By: ______AJ Clacher________

ANNEXURE G — OUTSTANDING ITEMS FOR FIRST REVIEW

The following items were outstanding as at the initial issue of this Manual (Version issued during Business Rescue proceedings (2021) and must be confirmed and incorporated at the first annual review no later than 30 June 2027:

#	Outstanding Item	Action Required
1	Confirmation that all pre-rescue records (pre-March 2019) are still held and accessible by the Company	Director / Information Officer to confirm
2	Formal confirmation that the Business Rescue Practitioners have transferred all records custodianship to management on exit	Handover on termination 30 June 2026
3	Confirmation of functions and records categories applicable post-rescue	New Board / Director to confirm following exit
4	Formal adoption of Company Vision, Mission and Values by the reconstituted Board of Directors and shareholders	New Board to action following exit
5	Updated corporate structure reflecting post-rescue entity landscape once BRP wind-down is finalised	Information Officer to update at first review
6	Confirmation of JSE listing status and any shareholder communications arising from exit from Business Rescue	Delisted
7	Updated share register details following management-led share register update process	In progress with Computershare

ANNEXURE H — FORM C: REQUEST FOR ACCESS TO RECORDS OF A PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 — Act No. 2 of 2000) [Regulation 10]

A. Particulars of Private Body

The Head / Information Officer:
Anthony John Clacher
Group Five Limited
Boardwalk Office Park, Block 10, First Floor Suite 13, 107 Haymeadow Street, Faerie Glen, 0043

B. Particulars of Person Requesting Access to Record

(a) The particulars of the person who requests access to the record must be given below. (b) The address and/or email address in the Republic to which the information is to be sent must be given. (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:	
Identity number:	
Postal address:	
Telephone number:	
E-mail address:	
Capacity in which request is made (if on behalf of another):	

C. Particulars of Person on Whose Behalf Request is Made

(Complete ONLY if a request for information is made on behalf of another person)

Full names and surname:	
Identity number:	

D. Particulars of Record Requested

Provide full particulars of the record to which access is requested, including the reference number if known.

Description of record:	
Reference number (if available):	
Any further particulars:	

E. Fees

A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid. If you qualify for exemption from payment of any fee, please state the reason for exemption below.

Reason for exemption (if applicable):	

F. Form of Access to Record Requested

Mark the appropriate box with an X.

	Written or printed record		Visual images (photos, video, etc.)		Audio record
☐	Copy of record	☐	View the images	☐	Listen to soundtrack
☐	Inspection of record	☐	Copy of images	☐	Transcription of soundtrack
☐	Printed copy from computer	☐	Transcription of images		
☐	Copy in computer-readable form (compact disc)				

☐	If you requested a copy or transcription above, do you wish it to be posted to you? (Postage is payable.)

G. Particulars of Right to be Exercised or Protected

Indicate which right is to be exercised or protected:	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

H. Notice of Decision

How would you prefer to be informed of the decision?	

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

Signed at: ______________________________	Date: ______________________________
Signature of Requester / Person on whose behalf request is made:	