

O A S I S



GROUP HOLDINGS (PTY) LTD.

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 OF 2000

THE ACT:

The Promotion of Access to Information Act, No. 2 of 2000 (the 'Act') gives persons the right of access to information that is required for the exercise or protection of any rights. In order for access to information to be granted, certain requirements have to be met. The Act also requires private bodies such as Oasis Group Holdings (Pty) Ltd. to compile a manual, designed to assist people who want to exercise their right to access to information. This manual, as well as the prescribed request form and fees payable should you wish to exercise your right of access to information, is available below.

MANUAL PREPARED FOR THE FOLLOWING ENTITIES:

- Eden Court Trust
- Eden Court Holdings (Pty) Ltd.
- Eden Court Investments (Pty) Ltd.
- Eden Court Property Investments Company (Pty) Ltd.
- Roodebloem Estates (Pty) Ltd.
- Eden Court Property Fund (Pty) Ltd.
- Oasis Crescent Property Developers (Pty) Ltd.
- Oasis Crescent Land Developers (Pty) Ltd.
- Oasis Controlling Company (Pty) Ltd.
- Eden Court Property Company No.1 (Pty) Ltd.
- Crescent Property Company No.1 (Pty) Ltd.
- Oasis Group Holdings (Pty) Ltd.
- Oasis Crescent Management Company Ltd.
- Oasis Crescent Retirement Solutions (Pty) Ltd.
- Oasis Crescent Property Fund Managers Ltd.
- Oasis Crescent Insurance Company Ltd.
- Oasis Crescent Nominees (Pty) Ltd.
- Oasis Crescent Wealth Management (Pty) Ltd.
- Oasis Crescent Capital (Pty) Ltd.
- Oasis Asset Management Ltd.
- Oasis Private Clients (Pty) Ltd.
- Oasis Sports Foundation (Pty) Ltd.

- Oasis Crescent Advisory Services (Pty) Ltd.
- Eden Court Strategic Investments (Pty) Ltd.
- Friedshelf 1057 (Pty) Ltd.
- Friedshelf 1170 (Pty) Ltd.
- Friedshelf 1188 (Pty) Ltd.
- Friedshelf 999 (Pty) Ltd.
- Oasis Commodities (Pty) Ltd.
- Oasis Crescent Property Fund (Pty) Ltd.
- Fusion Properties 115 cc
- Eden Court Events (Pty) Ltd.
- Oasis Crescent Client Services cc
- Blue Scorpion Protection Services (Pty) Ltd.
- Eden Court Trading cc

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A. INTRODUCTION TO ENTITIES

The following entities are subsidiary companies of Eden Court Trust: Eden Court Holdings (Pty) Ltd. Eden Court Investments (Pty) Ltd., Eden Court Property Investments Company (Pty) Ltd. Roodebloem Estates (Pty) Ltd. Eden Court Property Fund (Pty) Ltd. Oasis Crescent Property Developers (Pty) Ltd. Oasis Crescent Land Developers (Pty) Ltd. Oasis Controlling Company (Pty) Ltd. Eden Court Property Company No.1 (Pty) Ltd. Crescent Property Company No.1 (Pty) Ltd. Oasis Group Holdings (Pty) Ltd. Oasis Crescent Management Company Ltd. Oasis Crescent Retirement Solutions (Pty) Ltd. Oasis Crescent Property Fund Managers Ltd. Oasis Crescent Insurance Company Ltd. Oasis Crescent Nominees (Pty) Ltd. Oasis Crescent Wealth Management (Pty) Ltd. Oasis Crescent Capital (Pty) Ltd. Oasis Asset Management Limited, Oasis Private Clients (Pty) Ltd. Oasis Sports Foundation (Pty) Ltd. Oasis Crescent Advisory Services (Pty) Ltd. Oasis Commodities (Pty) Ltd. Oasis Crescent Property Fund (Pty) Ltd.

The remaining entities are not subsidiary companies of Eden Court Trust however they fall within the wider Oasis Group.

The following entities are registered with the Financial Services Board of South Africa: Oasis Crescent Management Company Limited, Oasis Crescent Retirement Solutions (Pty) Ltd. Oasis Crescent Insurance Company Ltd. Oasis Crescent Nominees (Pty) Ltd. Oasis Crescent Wealth Management (Pty) Ltd. Oasis Crescent Capital (Pty) Ltd. and Oasis Asset Management Ltd..

Oasis Crescent Capital (Pty) Ltd. and Oasis Asset Management Ltd. are discretionary asset managers.

Oasis Crescent Management Company Ltd. is the duly appointed administrator of the collective investment schemes, pension funds, retirement funds and insurance companies.

Access to records of any subsidiary company of Oasis Group Holdings (Pty) Ltd. not listed in this manual may be requested from the Head of Compliance, Oasis Group Holdings (Pty) Ltd., at the address in this manual.

B.PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

This Manual has been compiled in accordance with the Promotion of Access to Information Act No. 2 of 2000 (the Act) and applies to all the identified entities.

1. Contact details

Oasis Group Holdings (Pty) Ltd. will deal with all requests relating to any of the entities. All requests for information in terms of this manual should be directed to:

Head of Compliance:

Oasis Group Holdings (Pty) Ltd.
96 Upper Roodebloem Road
University Estate
Cape Town
7925

Or

Oasis Group Holdings (Pty) Ltd.
PO Box 1217
Cape Town
8001

Tel: 021 413 7860

Fax: 021 413 7919

Email: legal@za.oasiscrescent.com

2. The section 10 Guide on how to use the Act

Should you require greater clarity on or assistance with the Act, we refer you to the Guide that has been published by the Human Rights Commission in terms of section 10 of the Act. It includes:

- what the objects of this Act are
- the relevant contact details of each public and private body (where possible)
- the process that needs to be followed in order to request access to records
- assistance available from the “SAHRC” and information officers of public bodies
- how to get access to the manual of a private body
- all the remedies available in law to you
- details on prescribed fees payable in respect of requests for information.

The Guide has been printed in each official language in the *Government Gazette* and is available for inspection by the public at the offices of the Human Rights Commission since August 2003.

Please direct any queries to:

The South African Human Rights Commission:
PAIA Unit
The Research and Documentation Department
Postal address: Private Bag 2700
HOUGHTON
2041

Telephone: +27 - 011 484 – 8300
Fax: +27 - 011 484 – 0582/1360

Website: www.sahrc.org.za
E-mail: PAIA@sahrc.org.za

3. Types of Records

(a) Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to any of the entities listed in this Manual and the Financial Services Industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation. Examples of such legislation are:

- Long-term Insurance Act, 52 of 1998
- Pension Funds Act, 24 of 1936
- Collective Investment Schemes Control Act, 45 of 2002
- Labour Relations Act, 66 of 1995
- Tax on Retirement Funds Act, 38 of 1996
- Basic Conditions of Employment Act, 75 of 1997
- Financial Services Board Act, 97 of 1990
- Companies Act, 61 of 1973
- Employment Equity Act, 55 of 1998
- Prevention of Organised Crime Act, 121 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Security Services Act 36 of 2004
- Income Tax Act, 58 of 1962
- Value-Added Tax Act, 89 of 1991
- Financial Advisory And Intermediary Services Act, 37 of 2002
- Public Management Finance Act, 1 of 1999

(b) Records available without requesting access in terms of the Act

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the Gazette.

The identified entities have not submitted any such description for publication in the Gazette. Certain records are however freely available on the internet at www.oasiscrescent.com.

(c) Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in the Act, available for the purposes of the

Act:

Records are held on the following subjects:

- Personnel records;
- Client-related records;
- Private body records;
- Records in the possession of or pertaining to other parties
- Nature of records held

(i) Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive an remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to the private body by their personnel;
- Any records a third party has provided to the private body about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasilegal records;
- Internal evaluation records; and
- Other internal records and correspondence.

(ii) Client-related records

A client includes any natural or juristic entity, who receives services from the private body. Client related information includes the following:

- Any records a client has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the client, including transactional records.

(iii) Private body records

The following are considered to include but not be limited to records, which pertain to the private body's own affairs:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;

- Securities and equities; and
- Records held by officials of the private body.

(iv) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/associated companies, joint venture companies, service providers.

Alternatively, such other parties may possess records, which can be said to belong to the private body. The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

(v) Nature of records

- Confidential
- Personal
- Research
- Commercial
- Operational
- Financial
- Trade
- Business

4. Notice in terms of section 52(2) of the Act: Voluntary disclosure and automatic availability of certain records

No Notice in terms of Section 52(2) of the Act has been published.

5. Requesting procedures

A person who wants access to the records of any of the identified entities must complete the necessary request form.

The request form can be accessed on www.oasiscrescent.com or www.sahrc.org.za. If a person needs assistance to obtain the form or on any other matter, please contact the Head of Compliance at the telephone number provided above.

The completed request form must be sent to the address, email or fax number provided above and marked for the attention of the Head of Compliance.

The Head of Compliance will ensure the request is processed and ensure that the requester is informed of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on www.oasiscrescent.com.

All the pertinent sections must be completed fully, failing which the process will be delayed while the Head of Compliance ensures such additional information is obtained.

NOTE: Access to certain records may be or must be denied on the grounds set out in the Act.

Mandatory grounds for refusal include but are not limited to:

- Information for the protection of the privacy of individuals;
- Information for the protection of commercial information and confidential information of third parties;
- Information privileged from production in legal proceedings;
- Commercial information of the company; and
- Research information

6. Availability of the manual

Copies of this manual is available for inspection, free of charge, at the offices of Oasis Group Holdings (Pty) Limited; copies are also available from the South African Human Rights Commission; from the Government printer and on our website (www.oasiscrescent.com)