Block 3
100 on Armstrong
100 Armstrong Avenue
La Lucia Ridge | 4051
Durban | South Africa

CEG GROUP

CONSOLIDATED PAIA MANUAL

CAPITAL EFFICIENCY GROUP ("CEG GROUP") AND ITS GROUP ENTITIES

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended

Read with the Protection of Personal Information Act 4 of 2013 ("POPIA"), as applicable

Document control	Details
Document	CEG Group Consolidated PAIA Manual
Primary Legislation	Promotion of Access to Information Act 2 of 2000, as amended
Related Legislation	Protection of Personal Information Act 4 of 2013 (POPIA); Financial Intelligence Centre Act 38 of 2001 (FICA); Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS); Companies Act 71 of 2008;
Group Information Officer	Wesley Coetzee
Contact Details	info@capef.co.za / 031-536 8213
Website	https://www.capef.co.za/
Version	1.0
Effective date	08/09/2026
Review cycle	At least annually and following material legal, structural or operational changes.
Approved by	Richard McElligott

IMPORTANT NOTE

"CEG Group" is a descriptive collective term used to refer to the affiliated entities listed in Schedule 1. CEG Group is not a separate registered company, juristic person or private body. Each group entity listed in Schedule 1 remains a separate and distinct juristic person/private body and is individually responsible for compliance with PAIA and other applicable legislation in respect of records held or controlled by it. This consolidated format is adopted for administrative convenience and does not merge the legal identities or statutory responsibilities of the group entities.

1. PURPOSE AND SCOPE

1.1. The purpose of this Manual is to facilitate the exercise of rights of access to records held by the CEG group entities in accordance with PAIA, while recognising the separate legal identities of each group entity.

1.2. This Manual applies to each legal entity (under the CEG Group) identified in Schedule 1. The entities are collectively referred to as the “CEG Group Entities” for convenience only.

1.3. Nothing in this Manual creates a separate legal person called “CEG Group” or transfers statutory responsibility from one group entity to another.

1.4. PAIA gives effect to the constitutional right of access to information held by private bodies where the statutory requirements are met. Section 51 requires a private body to compile a manual containing prescribed information. CEG Group’s PAIA Manual follows that structure.

1.5. This Manual does not create an automatic right to every record. Requests remain subject to PAIA's requirements and its mandatory and discretionary grounds for refusal.

1.6. POPIA affects the disclosure of personal information and privacy rights. CEG Group will balance access to information with lawful protection of personal information.

2. LEGAL STATUS AND STRUCTURE OF CEG GROUP

2.1. CEG Group is a business/grouping description and not a registered company or separate juristic person.

2.2. Each entity in Schedule 1 must be treated as the relevant private body for purposes of PAIA in relation to records held or controlled by that entity.

2.3. Where a request is submitted to a central Group contact and the relevant group entity is unclear, the request may be internally routed to the group entity that holds or controls the relevant record, where appropriate and lawful.

2.4. A single individual may perform Information Officer/Deputy Information Officer functions for more than one group entity where the appointments are validly made, and the applicable regulatory requirements are satisfied.

3. DEFINITIONS

Term	**Meaning**
CEG Group Entities	The CEG Group and its group entities listed in Schedule 1.
Information Officer	The person responsible for statutory information-access and information-governance functions applicable to the entity.
Requester	A person requesting access to a record under PAIA.
Record	A record as defined in PAIA, subject to statutory exclusions.
Personal information	Personal information as defined in POPIA.
Third party	A person or entity other than the requester and the relevant private body, as applicable.

4. CEG GROUP ENTITIES AND RESPECTIVE INFORMATION OFFICERS

All requests for access to information (other than information that is available to the public) must be addressed to the group entity's Information Officer as scheduled below:

Group Entity	Registration Number	Information Officer	FSP Number	Telephone / Email	Registered Address
Capital Efficiency Group (Pty) Ltd	2015/186027/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Wealth Management (Pty) Ltd	2025/615249/07	Dimitri Di Paolo	FSP No: 55516	031-536 8213 dimitri@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Accounting (Pty) Ltd	2009/023253/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Financial Services (Pty) Ltd	2019/288521/07	Wesley Coetzee	FSP No: 50392	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Trust Company (Pty) Ltd	2015/006266/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100

					Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
Ralcorp (Pty) Ltd	1980/002377/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Fiduciary Services (Pty) Ltd	2021/926428/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Trust Administrators (Pty) Ltd	2024/492604/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051

The list comprising the CEG Group Entities may change from time to time as a result of acquisitions, disposals or internal restructuring. The current list of CEG Group companies is available on request from the Information Officer identified Schedule 1 above.

5. GUIDE ON HOW TO USE PAIA

The official guide on how to use PAIA is available from the Information Regulator of South Africa's website, which provides an updated guide in all official languages. It is designed to assist persons in exercising their rights to access information.

6. LEGISLATION AND REGULATORY FRAMEWORK

This Manual must be read with all applicable South African legislation and regulatory requirements, including:

- Constitution of the Republic of South Africa, 1996;
- Promotion of Access to Information Act, 2 of 2000 (PAIA), as amended;
- Protection of Personal Information Act, 4 of 2013 (POPIA), as amended;
- Companies Act, 71 of 2008;
- Financial Intelligence Centre Act, 38 of 2001 (FICA);
- Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS);
- Income Tax Act, 58 of 1962;
- Employment Equity Act, 55 of 1998;
- Basic Conditions of Employment Act, 75 of 1997;
- Labour Relations Act, 66 of 1995;
- Occupational Health and Safety Act, 85 of 1993;
- Electronic Communications and Transactions Act, 25 of 2002;
- Consumer Protection Act, 68 of 2008;
- Collective Investment Schemes Control Act (Act 45 of 2002) (CISCA);

7. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICERS

Each applicable group entity must maintain an appropriate Information Officer and, where applicable, Deputy Information Officer arrangements. The relevant details must be recorded in Schedule 1 and kept current and up to date.

The Group entity's Information Officers are responsible for the functions assigned by PAIA, POPIA and applicable Information Regulator requirements, including facilitating access requests, maintaining appropriate records and supporting compliance reporting.

8. DESCRIPTION OF CEG GROUP ENTITIES AND BUSINESS ACTIVITIES

Schedule 1 contains the exact registered name and registration number of every group entity covered by this Manual, together with a concise description of its business activities and applicable licences or regulatory status.

No group entity should be regarded as covered merely because it is informally described as part of CEG Group; the group entity must be expressly identified in Schedule 1.

9. CATEGORIES OF RECORDS HELD

Depending on the relevant group entity, CEG Group may hold records concerning corporate governance, statutory filings, financial and accounting matters, tax, human resources, clients/customers, suppliers, FICA/AML and customer due diligence, FAIS/FSP matters, legal and compliance matters, risk and audit, information technology, information security, marketing, contracts, operations, property and personal information.

The existence of a category does not mean that every group entity holds every category or that access to a record is automatic. Access remains subject to PAIA and applicable grounds of refusal, confidentiality, privacy, privilege and other legal restrictions.

Subject	Categories
Statutory Company Records	➢ Certificate of Incorporation ➢ Memorandum of Incorporation ➢ Share registers and resolutions
Financial Records	➢ Annual Financial Statements ➢ Tax returns ➢ Accounting records ➢ Invoices and receipts
Human Resources Records	➢ Employee personal information ➢ Employment contracts ➢ Payroll and remuneration records ➢ Disciplinary records

Client Records	➢ Client application forms ➢ Advice records (in terms of FAIS) ➢ Client FICA documentation ➢ Correspondence and communications ➢ Policy schedules, investment mandates, or product information
Operational and Administrative Records	➢ Internal policies and procedures ➢ Compliance reports and audit findings ➢ Complaints registers and resolutions ➢ Training materials and attendance records
Information Technology and Communication	➢ IT usage and security policies ➢ Emails and correspondence records ➢ Website analytics and user data

10. RECORDS AUTOMATICALLY AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Where applicable, records may be available without a formal PAIA request through the CEG Group's website, public disclosures, brochures, marketing materials, statutory registers/filings, reports or other lawful channels.

Each group entity may maintain an entity-specific notice identifying categories of automatically available records where required or appropriate.

Category	Examples	Availability
Corporate / Public	Company profile, public contact details, public services	Website / request
Regulatory	Public FSP licence information and other public regulatory information	Website / request
Marketing	Brochures, public product/service information	Website / request
Policies intended for public access	Privacy notice, complaints process, this PAIA Manual	Website / request

11. RECORDS AVAILABLE UNDER OTHER LEGISLATION

Certain records may be accessible through procedures created by the Companies Act, FICA, FAIS, tax legislation, employment legislation or other applicable laws. A statutory retention requirement does not by itself create an unrestricted right of access.

Law	Examples
Companies Act	MOI, statutory registers, governance records, beneficial ownership records, subject to applicable access rules.
FICA	Customer Due Diligence (CDD) and Know Your Client (KYC) records, transaction records, business correspondence, beneficial ownership and compliance records.
FAIS	Client agreements, disclosures, advice records, complaints, representative records and compliance records.
Tax laws	Accounting and tax records, SARS correspondence and supporting documents.
Employment laws	Employment, payroll, leave, disciplinary, health and safety and related records, subject to confidentiality and privacy.

12. INFORMATION AVAILABLE WITHOUT REQUEST

Certain information is automatically available without a formal PAIA request, such as:

- Group entity CIPC Disclosure Documents
- FSP disclosure documents
- Website content and marketing material
- CEG Group profile

13. REQUESTING ACCESS TO RECORDS

A request for access to information must be made on the prescribed **Request for Access Form (Form 2)** (available from the Information Regulator's website) and submitted to the relevant group entity's Information Officer, Deputy Information Officer or designated PAIA contact as mentioned in Schedule 1.

The request must also include:

- **Full particulars of the requester and proof of identity:** If a request is made on behalf of another person, the requester must submit proof of the capacity to which the requester is making the request to the satisfaction of the respective Information Officer as mentioned in Schedule 1.
- **The specific information requested**: The requester should identify the relevant CEG group entity and describe the requested record with sufficient detail to enable the record to be identified and located. Where required, the requester must state the right to be exercised or protected and comply with the applicable procedural requirements.
- **The form of access required**: The requester should also indicate if any other manner should be used to inform the requester, and if so, furnish the necessary particulars to be so informed.

The prescribed request fee, as per PAIA regulations, must be attached and payable before the request is processed. The requester will be informed of any fees payable.

The respective Information Officer as mentioned in Schedule 1, will respond to your request within 30 days of receiving the request by indicating whether your request for access has been granted or denied.

Kindly note that the successful completion and submission of **Form 2** does not automatically allow the requestor access to the requested record.

Access will be granted to a record only if the following criteria are fulfilled:-

- The record is required for the exercise or protection of any right; and
- The requestor complies with the procedural requirements set out in PAIA relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of PAIA.

Where a request is misdirected to another CEG group entity, it may be routed internally where appropriate. The group entity responsible for the record remains responsible for the decision on access.

Requests will be processed within the statutory periods applicable under PAIA, subject to lawful extensions, notices, fees and grounds for refusal.

14. GROUNDS FOR REFUSAL OF A REQUEST

Access to any record may be refused under certain limited circumstances. These include:

- The protection of personal information from unreasonable disclosure concerning any natural person;
- The protection of commercial information held concerning any third party (for example trade secrets);
- The protection of financial, commercial, scientific or technical information that may harm the commercial or financial interests of any third party;
- Disclosures that would result in a breach of a duty of confidence owed to a third party;
- Disclosures that would jeopardize the safety or life of an individual;
- Disclosures that would prejudice or impair the security of property or means of transport;
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- Disclosures that would prejudice or impair the protection of the safety of the public;
- Disclosures that are privileged from production in legal proceedings unless the privilege has been waved;
- Disclosures of details of any computer program;
- Disclosures that will put CEG Group at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interests of CEG Group;
- Disclosures of any record containing information about research and development being carried out or about to be carried out by CEG Group.

If access to a record or any other relevant information is denied, our response will include:

- Adequate reasons for the refusal; and

- Notice that you may lodge an application with the court against the refusal and the procedure including details of the period for lodging the application.

15. FEES

Fees will be charged strictly in accordance with the current PAIA Regulations. The group entity will verify the prescribed request, search, preparation, reproduction, deposit and postage/electronic fees applicable at the time of each request.

There are two basic types of fees payable in terms of PAIA:-

- **Request Fee:** The non-refundable request fee of R 140.00 (excluding VAT) is payable on submission of any request for access to any record. This does not apply if the request is for the personal records of the requestor. No fee is payable in such circumstances.
- **Access Fee:** The access fee is payable prior to being permitted access to the records in the required form. The applicable fees are prescribed in terms of Part III of Annexure A as identified in Government Notice Number 187, Regulation 11.

16. PROCESSING PERSONAL INFORMATION

Personal information must be processed in accordance with POPIA and the applicable CEG group entity's privacy policies and notices.

Requests concerning a requester's own personal information must be handled using the applicable PAIA and/or POPIA mechanisms.

Before disclosure, the relevant group entity must consider privacy, confidentiality, security and third-party rights and any applicable statutory restrictions.

16.1 Purpose of Processing

- Fulfilling statutory obligations in terms of applicable legislation
- Historical record keeping, research and recording statistics necessary for fulfilling your business objectives.
- Keeping accounts and records
- Marketing and advertising

- Monitoring, maintaining and managing our contractual obligations to customers, clients, suppliers, service providers, employees, directors and other third parties
- Obtaining information necessary to provide contractually agreed services to a customers and clients
- Resolving and tracking complaints
- Staff administration
- Verifying information provided to us

16.2 Categories of Data Subjects

- Clients and client's employees, representatives, agents, contractors and service providers
- Existing and former employees (including contractors, agents, temporary and casual employees)
- Healthcare patients and healthcare providers associated with patients
- Our stakeholders
- Suppliers and service providers and their respective authorised employees, representatives, agents, contractors and service providers of such suppliers and service providers

16.3 Categories of Personal Information Processed

Natural Persons

- Names
- Physical and postal addresses
- Date of birth
- ID number
- Tax related information
- Medical, dental, mental and/or other healthcare related information
- Nationality
- Gender
- Confidential correspondence
- Email address
- Telephone number

Juristic Persons:

- Names of contact persons
- Name of Legal Entity
- Registration Number
- Physical and Postal address and contact details
- Financial information
- Founding documents
- Tax related information
- Authorised signatories, beneficiaries, ultimate beneficial owners
- BBBEE information
- Necessary supporting documentation pertaining to Legal Entities, i.e., Deceased Estates; Trusts; Companies; Close Corporations; Partnerships etc.

16.4 Categories of Special Information Processed

- Racial / Ethnic origin
- Physical / Mental Health details

16.5 Possible Recipients of Personal Information

- Auditors
- Banks and other financial institutions.
- Companies and Intellectual Property Commission (CIPC
- Claims investigators
- Educators and examining bodies
- Employees of the organisation
- Employment and recruitment agencies
- Family, associates and representatives of the person whose personal information is processed
- Healthcare, social and welfare organisations
- Ombudsman and regulatory authorities
- Patient associated healthcare facilities and professionals

- Police / courts where necessary
- Regulatory, statutory and government bodies
- Suppliers, service providers, vendors, agents and representatives of such entities
- Third party verification agencies and credit bureau

16.6 Trans-border / Cross Border Flows of Personal Information

It may be required from time to time to share personal information on data subjects with third parties in other countries. Any sharing of personal information of data subjects with third parties in other countries will be done only if the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection which effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person, as set out in the POPI Act and the data subject consents to the transfer.

Any such transfer will have to be shown to be necessary for the performance of a contract between the data subject and the recipient in question, or for the implementation of pre-contractual measures taken in response to the data subject’s request.

16.7 General Description of Information Security Measures

Up-to-date technology is employed to ensure the confidentiality, integrity and availability of Personal Information under our care.

Measures include:-

- Acceptable usage of personal information
- Access control to personal information
- All third parties with whom any contract exists are required to ensure that appropriate security, privacy and confidentiality obligations are observed.
- Computer and network security including Firewalls, Virus protection software and update protocols
- Governance and regulatory compliance
- Information security and HR policies include confidentiality clauses for employees

- Internal process to report security breach or anticipated security breach
- Investigating and reacting to security incidents.
- Logical and physical access control
- Monitoring access and usage of private information
- Physical security
- Retention and disposal of information
- Secure communications
- Security in the outsourcing of any activities or functions through appropriate contracts
- Training of staff members

CEG Group continuously establish and maintain appropriate, reasonable technical and organisational measures to ensure that the integrity of the Personal Information which may be in our possession or under our control, is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements set forth in law, in industry practice and generally accepted information security practices and procedures applicable.

17. RIGHT TO CHALLENGE A DECISION

CEG Group is not a public body referred to in paragraph (a) of the definition of “public body” in section 1 of PAIA. Therefore, no internal appeal lies against the decision of the respective Information Officer regarding access to information.

18. KEY LOCATIONS TO OBTAIN THE PAIA MANUAL

- **Information Regulator Website:** The primary source for the updated, official guide is https://inforegulator.org.za/.
- **Physical Offices:** Copies can be inspected or requested from the offices of public and private bodies, as well as the Information Regulator’s office.
- **Government Websites**: Older versions or related documents may be found on government portals such as https://www.justice.gov.za/inforeg/.

- **Email/Contact**: Information can be requested via email at PAIAComplaints@inforegulator.org.za and enquiries@inforegulator.org.za for general enquiries and contact number being 010 023 5200.

The guide outlines the procedure for requesting access to records from both public and private bodies, including the required forms and fees

In terms of Section 51(1) of PAIA: -

- PAIA grants a requester access to records of a private body, if the record is required for exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- Requests in terms of PAIA must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in regulations 6 and 7 of PAIA.
- Requesters are referred to the Guide which, in terms of Section 10 as amended, has been compiled by the Information Regulator established in terms of section 39 of PAIA and which contains information for the purposes of exercising Constitutional Rights.

If a requester does not agree with the decision, the requester may apply, within 180 days of being advised of the respective Information Officer's decision, to the High Court having jurisdiction, for an appropriate order.

A requester may also seek relief from any court with appropriate jurisdiction in respect of the following decisions of the group entity's Information Officer:

- The amount of fees required to be paid; and / or
- The extension of the period within which the information will be provided.

19. PROCESSING PERSONAL INFORMATION IN TERMS OF POPI ACT

CEG Group must collect and use information, including personal information as defined in the POPI Act, to the extent that it is necessary to properly perform the functions, obligations and duties.

CEG Group processes personal information of the following data subject categories:

- Information required for the rendering of financial services in terms of advice and intermediary services for which the group entity is authorized by the FSCA to render.

- The group entity’s employees and job applicants
- Third party suppliers
- Regulatory bodies that the group entity is governed by
- The following categories of personal information are processed to fulfil the functions: -
    - Identifying number (employee number; company registration numbers, ID number)
    - Email addresses, physical addresses, telephone number
    - Names, surname, marital status, nationality, sexual orientation, age, physical health status, mental health status, well-being, disability status, language, birthplace, date of birth.
    - Biometric information
    - Information on your race, ethnic or social origin, criminal recordings /proceedings
    - Education, medical, financial, employment information

Personal information is only disclosed if it is necessary to fulfil our legislative mandate for business purposes, where there is a legal obligation, there is a public duty to disclose the information, or the legitimate interests of the data subject require disclosure or consent was provided by data subject to disclose the information.

The recipients of information include FSP service providers, other regulators (including foreign regulators), law enforcement agencies, and verification agents.

Personal information may be processed in other jurisdictions outside of South Africa for business purposes, sharing with foreign regulators for fulfilling a legislative mandate or law enforcement agencies for investigation purposes.

Where appropriate, CEG Group request the third parties with whom we share information with, to take adequate measures and comply with applicable data protection laws and protect the information we are disclosing to them. We do this through contractual arrangements with these third parties. We also take internal measures to ensure that the third parties we appoint have appropriate measures to protect the information we provide to them.

20. POPIA AND ACCESS TO PERSONAL INFORMATION

CEG Group will protect personal information and assess requests involving personal information under both PAIA and POPIA. Section 17 of POPIA requires a responsible party to maintain documentation of processing operations; the Group maintains that information through its separate POPIA Policy and processing documentation.

21. PROTECTION OF PERSONAL INFORMATION

In terms of POPI, CEG Group is committed to ensuring that all personal information is processed lawfully, minimally, and securely.

CEG Group's POPIA Compliance Policy outlines:

- Purpose of data collection
- Categories of personal information processed
- Data subjects' rights
- Data retention periods
- Security measures in place

Data subjects may request:

- Confirmation of whether their personal information is held
- Access to their personal information
- Correction or deletion of personal information

Note: Requests must be directed at the respective Information Officer.

22. RECORD RETENTION AND DESTRUCTION AND FINANCIAL SERVICES RECORDS IN TERMS OF FAIS

Records must be retained for the periods prescribed by applicable legislation, regulation, contract and the group entity records-retention framework.

Records may only be securely destroyed or disposed of when lawful and appropriate, taking account of litigation holds, investigations, audits, regulatory preservation requirements and other legal obligations.

Group entities subject to FAIS must maintain records required by FAIS, subordinate legislation and applicable regulatory requirements, including relevant client, advice, compliance, representative, complaint and supervisory records where applicable.

Access to such records is subject to PAIA and any applicable confidentiality, privilege, regulatory, contractual and third-party restrictions.

Where applicable, FICA and FAIS records are retained and protected according to their statutory requirements. Section 23 of FICA requires specified records to be kept for at least five (5) years from termination of the business relationship, conclusion of the transaction, or submission of a relevant report.

FAIS section 18 requires an authorised Financial Service Provider to maintain specified records for a minimum period of five (5) years, subject to applicable exemptions and requirements.

23. INFORMATION SECURITY

Reasonable technical and organisational safeguards must be implemented to protect records against loss, unauthorised access, disclosure, alteration or destruction, taking into account the nature and sensitivity of the information.

24. FICA, ANTI-MONEY LAUNDERING (AML) AND COUNTERING THE FINANCING OF TERRORISM (CFT)

Group entities subject to FICA must maintain records required by FICA and applicable regulatory requirements, including relevant customer due diligence, identification, verification, transaction and related compliance records where applicable.

Access to FICA-related records remains subject to PAIA, confidentiality, legal privilege, regulatory restrictions, disclosure prohibitions and third-party rights.

25. AVAILABILITY OF MANUAL

This Manual is available through appropriate channels (as listed below) in accordance with PAIA and current Information Regulator requirements, including relevant websites and at applicable offices.

A central CEG Group website hosts the consolidated Manual for convenience, which clearly identifies every covered legal group entity and the Manual does not represent CEG Group as a separate private body.

This manual is available:

- On request from the respective Information Officer referred to in Schedule 1.
- Free of charge on the Group's website.
- In hard copy at the Group's registered office.

Any transmission costs or postage required in respect of hard copies of the Manual will be for the account of the requester.

26. COMPLAINTS, REVIEWS AND REMEDIES

A requester dissatisfied with a decision or non-response may use the remedies available under PAIA and applicable procedures, including the Information Regulator's complaint mechanisms and court processes where appropriate.

Complaints should first be directed to the relevant group entity to allow the matter to be investigated and, where possible, resolved.

27. UPDATING AND REVIEW OF THE MANUAL

This Manual is reviewed at least annually and whenever there is a material change in legislation, Group structure, business activities, Information Officer arrangements or information-processing practices.

Each applicable group entity should approve/adopt the Manual through its appropriate governance process and ensure that its entity-specific schedules remain accurate.

28. APPROVAL

This Manual has been approved for application across the CEG Group as follows:

Approved by: Richard McElligott

Designation: Group CEO

Date: 09 September 2026

Signature: ____________________