

PROMOTION OF ACCESS TO INFORMATION ACT

**SECTION 51 MANUAL OF
ADVANCED HEALTH (PTY) LTD**

Registration number 2013/059246/07

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended, and section 51 of the Protection of Personal Information Act 4 of 2013.

Parent company of Advanced Health SA (Pty) Ltd

October 2026

1. DEFINITIONS AND INTERPRETATION

“Advanced Health” or “Company”	Advanced Health (Pty) Ltd, registration number 2013/059246/07.
“AHSA”	Advanced Health SA (Pty) Ltd, registration number 2013/053514/07, a subsidiary through which the group’s operational healthcare business is conducted.
“DIO”	Deputy Information Officer.
“IO”	Information Officer and head of the private body.
“PAIA”	Promotion of Access to Information Act 2 of 2000, as amended.
“PAIA Regulations”	Regulations Relating to the Promotion of Access to Information, 2021.
“POPIA”	Protection of Personal Information Act 4 of 2013.
“Regulator”	Information Regulator (South Africa).

References to the Company in this Manual mean **Advanced Health (Pty) Ltd** only. A record held by AHSA is not, merely because AHSA is a subsidiary or provides administrative support to the Company, necessarily a record held by the Company for purposes of PAIA.

2. PURPOSE AND SCOPE OF THIS MANUAL

This Manual describes the records held by the Company, the records that may be available without a formal PAIA request, how to request access to a record, and the information required by PAIA and POPIA.

Advanced Health is the parent and holding company of AHSA. The Company does not itself operate hospitals or conduct the group’s day-to-day healthcare operations. Those operations are conducted through AHSA and its operating structures. The Company has no separate public-facing office or website and receives corporate, administrative and hosting support from AHSA.

Accordingly, this Manual is deliberately limited to records held by or on behalf of Advanced Health in its own capacity. Requests for operational hospital, patient, healthcare-practitioner, employee or facility records should ordinarily be directed to AHSA or the relevant operating entity. The IO or DIO will redirect or transfer a request where PAIA permits and the appropriate body can be identified.

3. COMPANY AND CONTACT DETAILS

Registered name	Advanced Health (Pty) Ltd
Registration number	2013/059246/07
Nature of body	Private company and parent/holding company of Advanced Health SA (Pty) Ltd
Postal and physical address	Panorama Healthcare Centre, 2nd Floor, corner of Rothschild Boulevard and Hennie Winterbach Street, Panorama, Cape Town
Telephone	(012) 346 5020
Information Officer	Dorena Goss-Ross, Group Managing Director
Information Officer email	bibi@advancedhealth.co.za
Deputy Information Officer	Carina de Jongh
Deputy Information Officer email	carina.dj@advancedhealth.co.za

4. AVAILABILITY OF THIS MANUAL

The Company does not maintain a separate website or a separate office open to the public. This Manual:

- is hosted on AHSA’s website, www.advancedhealth.co.za, for administrative convenience;
- may be requested electronically from the IO or DIO at the contact details above;
- will be made available for inspection, free of charge and by prior arrangement, during normal business hours at the address above; and
- will be provided to the Regulator upon request.

Hosting on AHSA's website does not mean that AHSA's operational records are records of the Company or that AHSA is responsible for requests addressed to the Company.

5. INFORMATION REGULATOR CONTACT DETAILS

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200
Toll-free number	0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

6. GUIDE ON HOW TO USE PAIA

The Regulator has compiled and updated the Guide contemplated in section 10 of PAIA. The Guide explains how to exercise rights under PAIA and POPIA, the assistance available from an IO, the applicable forms and fees, available remedies, and how to lodge a complaint. It is available in each official language and in Braille from the Regulator's website and offices.

7. HOW TO REQUEST ACCESS TO A RECORD

A request for access to a record held by the Company must be made on prescribed Form 2 under regulation 7 of the PAIA Regulations and submitted to the IO or DIO at the contact details in section 3. Form 2 is available from the Regulator's website.

- The requester must identify the record and the right to be exercised or protected, and explain why the record is required for that purpose.
- If the requester acts for another person, proof of identity, authority and capacity must be supplied.
- The requester must state the preferred form of access and any other information required by Form 2.
- The Company will decide the request and notify the requester within 30 days after receipt, unless the period is validly extended once for not more than a further 30 days under section 57 of PAIA.
- Access remains subject to the mandatory and discretionary grounds for refusal in Chapter 4 of Part 3 of PAIA, including protection of personal information, third-party commercial information, confidential information, safety, legally privileged records, research information and the Company's commercial information.
- The Company has no internal appeal procedure. A requester or third party may lodge a complaint with the Regulator on prescribed Form 5 within 180 days of the decision and may thereafter seek appropriate court relief under section 78 of PAIA, subject to PAIA.

8. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

No notice describing categories of records automatically available from the Company has been published by the Minister under section 52(2) of PAIA. Subject to applicable restrictions, the following may nevertheless be available without a formal PAIA request:

- the Company's name, registration number and registered address;
- this Manual;
- publicly filed company information obtainable from the Companies and Intellectual Property Commission;
- group-level information or annual financial information that the Company has authorised for public release; and
- other information that the Company has expressly made public, including information hosted on AHSA's website on the Company's behalf.

9. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Records may be made available to persons entitled to them under applicable legislation, subject to the relevant statutory requirements. Legislation that may apply to the Company includes:

- Constitution of the Republic of South Africa, 1996;
- Companies Act 71 of 2008 and Companies Regulations, 2011;

- Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; and Value-Added Tax Act 89 of 1991;
- Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993; and Occupational Health and Safety Act 85 of 1993, to the extent applicable;
- Electronic Communications and Transactions Act 25 of 2002;
- Consumer Protection Act 68 of 2008 and National Credit Act 34 of 2005, to the extent applicable;
- Broad-Based Black Economic Empowerment Act 53 of 2003;
- Financial Intelligence Centre Act 38 of 2001, to the extent applicable;
- Competition Act 89 of 1998;
- POPIA; and
- PAIA.

Healthcare legislation applicable to AHSA's operating activities is not listed as legislation governing the Company's own operations merely because the Company is AHSA's parent. Such legislation may, however, be relevant to a particular record or transaction held by the Company.

10. SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE COMPANY

The listing of a category does not mean that every listed record exists or that access will be granted. Access is determined under PAIA in each case.

Corporate and statutory records: memorandum of incorporation; securities register; beneficial ownership information; statutory registers and returns; shareholder and board records; resolutions; minutes; governance policies; group structure records; company secretarial records; and correspondence with regulators.

Shareholding, investment and subsidiary records: records concerning the Company's shareholding in AHSA and any other subsidiaries or investments; shareholder agreements; subscriptions; acquisitions and disposals; due diligence; valuations; group reorganisations; capital contributions; distributions; reserved matters; and oversight or reporting information received in the Company's capacity as shareholder.

Financial, tax and funding records: annual financial statements; management accounts; budgets; bank records; tax returns and supporting records; audit records; loans; guarantees; security documents; funding arrangements; insurance records; and financial correspondence.

Contracts and legal records: material agreements; intra-group arrangements; confidentiality agreements; professional mandates; legal opinions and privileged correspondence; disputes; claims; litigation records; licences; and intellectual property records.

Directors, officers and personnel records: identification and contact details; declarations of interests; appointment and resignation records; qualifications; remuneration information; performance and governance records; and, only to the extent the Company employs or engages persons directly, employment or contractor records.

Supplier, adviser and service-provider records: engagement letters; contracts; invoices; banking and tax information; due-diligence records; B-BBEE information; confidentiality undertakings; and correspondence.

Information technology, access and security records: user access records; email and electronic records; system logs; information-security policies; incident records; backups; and records held by operators or service providers for the Company.

Third-party and public-domain information: records lawfully received from AHSA, subsidiaries, shareholders, funders, advisers, regulators and other third parties, and market or industry information relevant to the Company's role as a holding company.

Operational patient, clinical, hospital, healthcare-practitioner, facility and day-to-day operational employee records are ordinarily held by AHSA or the relevant operating entity and do not form part of the Company's own record categories unless a specific copy is lawfully held by the Company for a defined corporate, legal, audit, funding or governance purpose.

11. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

11.1 Categories of data subjects and personal information

Directors, prescribed officers and company representatives: identification and contact details, declarations of interests, appointment records, qualifications, remuneration or fee information, and governance correspondence.

Shareholders, beneficial owners and investors: identification, contact, ownership, beneficial ownership, banking, tax, transaction and due-diligence information.

Employees and contractors, if any: identification, contact, qualifications, engagement, remuneration, tax, leave, performance and next-of-kin information.

Suppliers, advisers and service providers: registration, contact-person, banking, tax, B-BBEE, contractual, billing and due-diligence information.

Representatives of AHSA and other group entities: identification, contact, role, authority, governance and business correspondence.

Regulators, funders and other business contacts: identification, contact, mandate, transaction and correspondence information.

Other persons whose information appears in records lawfully received by the Company: information relevant to the corporate, governance, legal, financial, audit or investment purpose for which the record is held.

The Company does not ordinarily collect or process patient or clinical information as part of its own holding-company activities. If such information is incidentally or exceptionally received, it will be processed only for a lawful, specific and necessary purpose and with safeguards appropriate to special personal information.

11.2 Purposes of processing

- corporate administration, governance and statutory compliance;
- managing shareholders, beneficial ownership, investments and subsidiary oversight;
- financial reporting, taxation, audit, banking, funding, insurance and risk management;
- performing and enforcing contracts and intra-group arrangements;
- legal advice, disputes, claims and regulatory engagement;
- appointing and administering directors, officers, employees, contractors, advisers and service providers;
- information security, business continuity, recordkeeping and fraud prevention; and
- any other lawful purpose compatible with the purpose for which the information was collected.

11.3 Recipients or categories of recipients

- AHSA and other group entities, where lawful and necessary;
- shareholders, directors and authorised company representatives;
- banks, funders, insurers, auditors, tax advisers, attorneys and other professional advisers;
- operators and service providers providing company-secretarial, administrative, information-technology, storage or other support;
- regulatory authorities, courts, law-enforcement bodies and other persons where disclosure is required or permitted by law; and
- transaction counterparties and their advisers, subject to appropriate confidentiality and legal safeguards.

11.4 Planned trans-border processing

The Company does not currently envisage transferring personal information outside the Republic. If personal information is transferred or processed outside the Republic, the Company will comply with section 72 of POPIA and implement an applicable lawful transfer mechanism and appropriate safeguards.

11.5 General description of information-security measures

The Company uses AHSA's premises, systems and administrative infrastructure. The Company nevertheless remains responsible for personal information processed by it or on its behalf. Measures applied, as appropriate to the risk, include:

- role-based and need-to-know access controls;
- password protection, user authentication, software updates, anti-malware protection and secure cloud or shared-drive controls;
- locked storage and controlled physical access for paper records;
- confidentiality obligations and operator arrangements;
- backup, archiving, incident-management and business-continuity measures;
- staff and authorised-user awareness measures; and
- retention and secure destruction or de-identification in accordance with applicable law and group policies.

12. RIGHTS OF DATA SUBJECTS

Subject to POPIA and other applicable law, a data subject may request confirmation of whether the Company holds personal information about that data subject, request access to or correction or deletion of personal information, object to processing where permitted, and lodge a complaint with the Regulator. Applicable prescribed forms are available from the Regulator.

13. RETENTION AND DESTRUCTION OF RECORDS

Records are retained for the periods required by applicable law, legitimate corporate and operational requirements, contractual obligations, audit requirements and any litigation hold. Company, financial, tax, governance and transaction records may be retained for different statutory periods. When retention is no longer lawful or necessary, records are securely destroyed or de-identified in accordance with applicable law and the group's record-retention and destruction policies.

14. PRESCRIBED FEES

The following applies to a request other than a personal request:

- The prescribed request fee is R140 and must be paid before the request is processed. No request fee is payable by a personal requester.
- If search and preparation will exceed six hours, the Company may require a deposit not exceeding one third of the access fee that would be payable if access is granted.
- Reproduction, access, search and preparation fees are payable at the rates prescribed in Annexure B to the PAIA Regulations. Records may be withheld until applicable fees have been paid.
- A requester may lodge a complaint with the Regulator or apply to court, as provided in PAIA, regarding a fee or deposit decision.

15. APPROVAL AND SIGNATURE

This Manual was approved for Advanced Health (Pty) Ltd on 1 October 2026 and will be updated when required.

Bibi Goss-Ross

DORENA GOSS-ROSS

Information Officer and Group Managing Director

For and on behalf of Advanced Health (Pty) Ltd