



ACCESS TO INFORMATION MANUAL

Reenergen Limited

Registration number: 2014/195093/06
ABN: 93 998 352 675
ARBN: 633 046 830

Compiled in terms of Section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA" or the "Act")

Reviewed and updated December 2022

A copy of the manual will be available, in accordance with Section 51 (3) of the Act, is available on the company website at www.reenergen.co.za and also for inspection during office hours and upon request at Reenergen Head Office.

1. INTRODUCTION

- 1.1. The purpose of the Promotion of Access to Information Act No. 2 of 2000, as amended, is to give effect to Section 32 (2) of the Constitution, which provides that any Person has a right to gain access to any information that is required for the exercise or protection of any rights and which is held by a public or private body. While PAIA allows for access to information, it further also allows the grounds that may be relied upon to refuse access to such information.
- 1.2. This document serves as the Information Manual of Renergen and all of its subsidiary companies in terms of PAIA, to provide information regarding the Records held and the process that needs to be followed to request access to such records.

2. DEFINITIONS

- 2.1. **“Company”** means Renergen Limited and /or all of its subsidiary companies or affiliates;
- 2.2. **“Constitution”** means the Constitution of South Africa Act No. 108 of 1996;
- 2.3. **“Deputy Information Officer”** means the designated person who has been duly so appointed to assist the Information Officer with PAIA and POPIA compliance and/or requests;
- 2.4. **“Guide”** means the guide on how to use PAIA by any person who wishes to exercise any right contemplated in Promotion of Access to Information Act of 2000 (PAIA) and the Protection of Personal Information Act 04 of 2013, as contemplated in section 10 of PAIA;
- 2.5. **“Information Officer”** means the person responsible for PAIA and POPIA compliance and/or requests of the Company;
- 2.6. **“Information Regulator”** means the supervisory authority responsible for monitoring compliance with POPIA and PAIA, established pursuant to Section 39 of the Protection of Personal Information Act, 2013, as amended;
- 2.7. **“Manual”** means this manual compiled in terms of section 51 of the Promotion of Access to Information Act;
- 2.8. **“PAIA”** means the Promotion of Access to Information Act 2 of 2000;
- 2.9. **“Person”** means a natural person or a juristic person;
- 2.10. **“POPIA”** means the Protection of Personal Information Act 4 of 2013;
- 2.11. **“Requester”** means any person, including, but not limited to, a public body or an official thereof or a person acting on the behalf such a Person, making a request for access to a record of the Company;
- 2.12. **“Record”** means any recorded data, regardless of form or medium, which is in the process or under the control of the Company, irrespective of whether it was created by the Company or not; and
- 2.13. **“Request”** means a request for access to a record by a Requester;

3. COMPANY OVERVIEW

Renergen Limited is a company incorporated in accordance with the laws of the Republic of South Africa and is listed on the JSE, A2X and ASX. The Company through its wholly owned subsidiary Tetra4 is South Africa's only holder of an onshore petroleum production right and is the first and only producer of helium and liquefied natural gas (LNG).

4. PURPOSE

The purpose of this Manual is to inform a Requester on the process of how to obtain access to Records held by The Company and/or the subsidiary companies, thereby giving effect to Section 51 of the PAIA, and where applicable, Section 23 of POPIA.

This Manual provides for different categories of records which may be provided to a Requester without the need for a Requester to submit a formal Request. It also provides a list of categories of records which requires the lodging of a formal Request.

5. GUIDANCE ON HOW TO USE THE ACT

- 5.1. Requests in terms of the Act shall be made in accordance with the prescribed procedures, together with payment in accordance with the prescribed fees. The forms and tariffs for a request are dealt with in paragraph 10 of this Manual.
- 5.2. Requesters are further referred to the Guide pursuant to Section 10 of the Act, which has been compiled by the Information Regulator, which will contain information for the purposes of exercising constitutional rights. The Guide is available on the Information Regulator's Website at the link below:
<https://info regulator.org.za/paia-forms>
- 5.3. Should there be any queries in this regard, kindly contact the Information Regulator directly at:

The Information Regulator

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
Physical Address: 27 Stiemens Street, Braamfontein, Johannesburg, 2017
Telephone Number: 010 023 5200
Email: enquiries@info regulator.org.za
Website: <https://info regulator.org.za/>

6. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

In accordance with Section 51(1)(a) of the Act, the contact details and contact persons for the Company, in relation to the Act, are as follows:

Information Officer

Name: Mr Stefano Marani
Title: Chief Executive Officer
Address: Renergen, First Floor, 1 Bompas Road, Dunkeld West, 2196
Email: Stefano@renergen.co.za
Tel: +2710 045 6000

Deputy Information Officers

Name: Mr Will Fritz
Title: Legal Counsel
Address: Renergen, First Floor, 1 Bompas Road, Dunkeld West, 2196
Email: Will@renergen.co.za
Tel: +2710 045 6000

Name: Mrs Mandy Stuart
Title: Head: ESG & Marketing
Address: Renergen, First Floor, 1 Bompas Road, Dunkeld West, 2196
Email: Mandy@renergen.co.za
Tel: +2710 045 6000

7. AUTOMATIC AVAILABILITY OF CERTAIN RECORDS

No records will be made automatically available, save for:

7.1.1. environmental permits, audits and monitoring reports published on the Renegergen website. Notwithstanding the forgoing, necessary redactions shall be made if required to protect commercially sensitive information; and

7.1.2. any such other information as published on the website from time to time.

8. RECORDS THAT ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

8.1. Records are kept in accordance with such other legislation as is applicable to The Company, which includes but is not limited to the following legislation:

- 8.1.1. Basic Conditions of Employment Act 75 of 1997
- 8.1.2. Broad Based Black Economic Empowerment Act 53 of 2003
- 8.1.3. Companies Act 75 of 2008
- 8.1.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 8.1.5. Electronic Communications and Transactions Act 25 of 2002
- 8.1.6. Employment Equity Act 55 of 1998
- 8.1.7. Income Tax Act 58 of 1962
- 8.1.8. Insolvency Act 24 of 1936
- 8.1.9. Labour Relations Act 66 of 1995
- 8.1.10. Skills Development Act 97 of 1998
- 8.1.11. Skills Development Levies Act 9 of 1999
- 8.1.12. Unemployment Insurance Act 63 of 2001
- 8.1.13. Unemployment Insurance Contributions Act 4 of 2002
- 8.1.14. Value Added Tax Act 89 of 1991
- 8.1.15. The Occupational Health and Safety Act No. 85 of 1993;

9. DESCRIPTION OF SUBJECTS FOR WHICH RECORDS ARE HELD AND THE CATEGORIES THEREOF

The subjects and categories of official and/or confidential information on which the Company holds records of are as follows:

9.1. Chief Executive's Office records, including:

- 9.1.1. Statutory Records
- 9.1.2. Administration Records
- 9.1.3. Government Records
- 9.1.4. Research Records
- 9.1.5. Sponsorship Records

9.2. Financial records, including:

- 9.2.1. statutory books of account;
- 9.2.2. budget reports;
- 9.2.3. bank reports;
- 9.2.4. audited financial statements;
- 9.2.5. audit reports;
- 9.2.6. insurance record;
- 9.2.7. tax records;
- 9.2.8. accounting records

9.3. Operational Information, including:

- 9.3.1. budget reports;
- 9.3.2. monthly reports.

9.4. Business Strategy Information, including

- 9.4.1. business plan;
- 9.4.2. budget reports;
- 9.4.3. minutes of board meetings;
- 9.4.4. monthly reports; and
- 9.4.5. annual reports.

9.5. Assets, including:

- 9.5.1. asset register;
- 9.5.2. bank account reconciliations;
- 9.5.3. debtors' information; and

- 9.5.4. share certificates.
- 9.6. Liabilities, including:
 - 9.6.1. general ledger; and
 - 9.6.2. loan agreements.
- 9.7. Marketing, including:
 - 9.7.1. business plan; and
 - 9.7.2. communication plans.
- 9.8. Information Technology, including:
 - 9.8.1. asset register;
 - 9.8.2. IT usage register;
 - 9.8.3. software licenses;
 - 9.8.4. repair and maintenance records;
 - 9.8.5. software programmes; and
 - 9.8.6. software records.
- 9.9. Human Resources, including:
 - 9.9.1. HR policies and procedures;
 - 9.9.2. employment equity reports;
 - 9.9.3. skills development reports;
 - 9.9.4. contracts of employment;
 - 9.9.5. payroll data; and
 - 9.9.6. employee records.
- 9.10. Contractual relationships, including:
 - 9.10.1. contracts;
 - 9.10.2. leases; and
 - 9.10.3. HP agreements.
- 9.11. Company organisational structure, including:
 - 9.11.1. Organogram.
- 9.12. Company secretarial, including:
 - 9.12.1. statutory documents;
 - 9.12.2. board resolutions;
 - 9.12.3. minute book;
 - 9.12.4. company/share registers; and
 - 9.12.5. audited results.
- 9.13. Investor Relations, including:
 - 9.13.1. general investor relations communications;
 - 9.13.2. announcements on SENS;
 - 9.13.3. presentations to analysts.
- 9.14. Nothing in paragraphs 8 and 9 must be construed as the Company consenting to the disclosure of the records listed therein. All Requests for access to records will be considered by the Company in accordance with paragraph 10 below and the Act.

10. **FORM OF REQUEST AND FEES**

- 10.1. A Request for information must be made in the prescribed form, a copy of which is annexed hereto as annexure "A", must be addressed to the Information Officer and/or the Deputy Information Officers and must be submitted with the prescribed fee.
- 10.2. The Request must provide sufficient details to enable the Company to identify:
 - 10.2.1. the Record(s) requested;
 - 10.2.2. the Requester (and if an agent is lodging the Request, proof of capacity);
 - 10.2.3. the form of access required;
 - 10.2.4. the postal address of the Requester in the Republic;
 - 10.2.5. if the Requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;

- 10.2.6. the right which the Requester is seeking to exercise or protect with and an explanation of the reason the Record is required to exercise or protect the right.
- 10.3. Prescribed Fee
 - 10.3.1. The following applies to Requests (other than personal requests):
 - 10.3.1.1. A Requestor is required to pay the prescribed fees (R140.00) before a Request will be processed;
 - 10.3.1.2. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the Request were granted);
 - 10.3.1.3. A Requestor may lodge an application with a court against the tender/payment of the Request fee and/or deposit;
 - 10.3.1.4. Records may be withheld until the fees have been paid.
 - 10.3.1.5. The prescribed fee can be paid into the bank account specified by the Information Officer and/or Deputy Information Officers from time to time.
 - 10.3.1.6. The prescribed fees can obtained from the amended regulations in terms of PAIA published under Government Notice R757 in Government Gazette 45057 of 27 August 2021.
- 10.4. Decision on Request
 - 10.4.1. Except where the record requested contains the information of third parties, or the Information Officer and/or the Deputy Information Officers has requested an extension in accordance with paragraph 10.4.2, the Information Officer and/or the Deputy Information Officers will as soon as reasonably possible, but in any event within 30 days after the Request has been received:
 - 10.4.1.1. Decide in accordance with the Act, whether to grant the Request; and
 - 10.4.1.2. Notify the Requester of the decision.
 - 10.4.2. The Information Officer and/or the Deputy Information Officers may extend the period of 30 days referred to in paragraph 10.4.1 above, once for a further period of not more than 30 days if:
 - 10.4.2.1. the Request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of The Company;
 - 10.4.2.2. the Request requires a search for records in, or collection thereof from, an office of the Company, not situated in the same town or city as the office of the Information Officer and/or the Deputy Information Officers that cannot reasonably be completed within the original period;
 - 10.4.2.3. consultation among divisions of the Company or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original period;
 - 10.4.2.4. more than one of the circumstances contemplated in paragraphs 10.4.2.1, 10.4.2.2 and 10.4.2.3 exist in respect of the request making compliance with the original period not reasonably possible; or
 - 10.4.2.5. the Requester consents in writing to such extension.
- 10.5. Third Party Information:
 - 10.5.1. If access is requested to a record that contains information about a third party, the Company is obliged to attempt to contact this third party to

inform them of the Request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

- 10.5.2. In the event of the third-party furnishing reasons for the support or denial of access, the Information Officer and/or Deputy Information Officers will consider these reasons in determining whether access should be granted, or not.

10.6. Grounds for refusal

The Company may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Company may refuse access include:

- 10.6.1. Disclosure of the record (containing trade secrets, financial, commercial, scientific, technical or any other confidential information) would harm the commercial or financial interests of the Company;
- 10.6.2. The record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- 10.6.3. Protecting personal information that the Company holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- 10.6.4. Protecting commercial information that the Company holds about a third party or Renegen (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organisation or the third party);
- 10.6.5. If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- 10.6.6. If disclosure of the record would endanger the life or physical safety of an individual;
- 10.6.7. If disclosure of the record would prejudice or impair the security of property or means of transport;
- 10.6.8. If disclosure of the records would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- 10.6.9. If disclosure of the record would prejudice or impair the protection of the safety of the public;
- 10.6.10. Disclosure of the record would put the Company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- 10.6.11. The record is a computer programme;
- 10.6.12. The record contains information about research being carried out or about to be carried out on behalf of a third party or the Company;
- 10.6.13. The disclosure would result in the breach of any law applicable to the Company; and
- 10.6.14. Any other grounds for refusal stated in the Act.

10.7. Records that cannot be found or do not exist

If the Company has searched for a record and it is believed that the record either does not exist or cannot be found, the Requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

ANNEXURE "A"

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000)

NOTE:

1. Proof of identity must be attached by the Requester.
2. If Requests made on behalf of another person, proof of such authorisation, must be attached to this form.

A. Particulars of private body

The Information Officer/Deputy Information Officer:

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number 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:

Fax number:

Telephone number:

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed *ONLY* if a request for information is made on behalf of another person.

Full names and surname:

Identity number:

D. Particulars of record

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form.
The requester must sign all the additional folios.

1 Description of record or relevant part of the record:

2 Reference number, if available:

3 Any further particulars of record:

E. Fees

- (a) 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.
- (b) You will be *notified of* the amount required to be paid as the request fee.
- (c) The fee payable for access to a record depends *on* the form *in which* access is required and the reasonable time *required* to search for and prepare a record.
- (d) If you qualify for exemption *of* the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required
Form in which record is required:	
Mark the appropriate box with an X.	
NOTES:	
(a) Compliance with your request in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:			
	copy of record*		inspection of record
2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			
	view the images		copy of the images"
			transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
	listen to the soundtrack audio cassette		transcription of soundtrack* written or printed document
4. If record is held on computer or in an electronic or machine-readable form:			
	printed copy of record*	printed copy of information derived from the record"	copy in computer readable form* (stiffy or compact disc)
If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			YES NO
Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available.			

G Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

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

H. Notice of decision regarding request for access

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 to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at..... This..... day of20

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE