

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA)

LABAT AFRICA LIMITED

(Registration number: 1989/001616/06)

PAIA Manual prepared in accordance with Section 15 of the Promotion of Access to Information Act, No. 2 of 2000

Date of issue: 16 January 2026

Last updated: 16 January 2026

1. INTRODUCTION

The Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information. This PAIA Manual has been prepared to comply with the requirements of section 15 of PAIA and provides an outline of the records held by Labat Africa Limited ("Labat" or "the Company") and the procedures to be followed when requesting access to such records.

Labat Africa Limited is a public company incorporated in the Republic of South Africa and listed on the Johannesburg Stock Exchange.

2. SCOPE OF THE MANUAL

This manual applies only to Labat Africa Limited and its **current operating subsidiaries**. Following a strategic repositioning, the Group has exited all healthcare and cannabis-related operations. The scope of this manual therefore **excludes all disposed entities**.

Key operating subsidiaries include:

- Classic International Trading (Pty) Ltd
- Ahnamu Investments (Pty) Ltd
- South African MicroElectronic Systems (Pty) Ltd
- SAMES Properties (Pty) Ltd

3. AVAILABILITY OF THE MANUAL

This PAIA Manual is available: - On the Company's website: www.labat.co.za
- Upon request from the Information Officer detailed below

4. INFORMATION OFFICER AND CONTACT DETAILS

Section 51(1)(a)

The Board of Directors has designated the **Chief Executive Officer** as the Information Officer for purposes of PAIA.

Information Officer / Chief Executive Officer

Name: Irfaan Noormohamed

Physical address:

The Leonardo, 14th Floor
75 Maude Street
Sandown, 2146
South Africa

Postal address:

Private Bag X09-248
Weltevreden Park, 1715

Telephone: +27 11 675 6841

Fax: +27 11 675 1019

Email: info@labat.co.za

5. GUIDE OF THE INFORMATION REGULATOR

In terms of section 10 of PAIA, the Information Regulator has published a guide to assist requesters in exercising their rights in terms of PAIA and POPIA. The guide is available: - From the Information Officer of Labat Africa Limited upon request; and - On the Information Regulator's website: <https://www.justice.gov.za/inforeg/>

6. RECORDS AUTOMATICALLY AVAILABLE

Section 51(1)(c)

Records required to be made publicly available in terms of the Companies Act, 71 of 2008, and the JSE Listings Requirements are available without a formal PAIA request.

7. RECORDS HELD IN TERMS OF OTHER LEGISLATION

Labat holds records in accordance with, inter alia, the following legislation: - Companies Act, 71 of 2008
- Promotion of Access to Information Act, 2 of 2000
- Protection of Personal Information Act, 4 of 2013
- Income Tax Act, 58 of 1962
- 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
- Occupational Health and Safety Act, 85 of 1993

(Healthcare-, cannabis-, pharmaceutical- and fuel-sector legislation is no longer applicable following the disposal of those operations.)

8. RECORDS HELD BY THE COMPANY

Records held by Labat relate primarily to its operations as a **technology, ICT and investment holding group** and include:

- Corporate governance records

- Financial and accounting records
- Taxation records
- Information technology and systems records
- Human resources records
- Legal and contractual records
- Marketing, investor relations and public communications

Access to records is subject to the grounds for refusal set out in Chapter 4 of PAIA.

9. REQUEST PROCEDURE

Requests for access to records must be made on the prescribed PAIA request form and submitted to the Information Officer using the contact details above. Proof of identity is required.

Labat will respond to requests within 30 days, subject to extensions permitted by PAIA.

10. FEES

The fees payable for access to records are prescribed in terms of PAIA regulations and will be communicated to requesters prior to processing.

11. UPDATING OF THE MANUAL

This manual will be updated from time to time as required by legislation or changes in the Company's operations.

Issued by order of the Board

Irfaan Noormohamed
Chief Executive Officer & Information Officer
Labat Africa Limited