

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

CORION CAPITAL (PTY) LTD

(REGISTRATION NUMBER: 2007/002166/07)

Information section

This manual references, in the body of the document, "the FSP", "the company" or "the external compliance provider". These references must be read with reference to the specific information in the table below.

Information item	Details
Financial Services Provider	Corion Capital (Pty) Ltd
FSP No.	44523
External Compliance Officer	Independent Compliance Services (Pty) Ltd, represented by Eugene Goosen
Information Officer	Simon du Plooy
Manual Last Reviewed	14 August 2026

Contents

1. Introduction	3
2. Company Contact Details (Section 51(1)(a))	3
3. Access to Records (Section 51(1)(b))	3
4. Records Available in Terms of Other Legislation (Section 51(1)(c))	4
5. Schedule of Records (Section 51(1)(d))	4
6. Form of a Request for Information (Section 51(1)(e))	6
7. Prescribed Fees (Section 51(1)(f))	6
8. Interaction with the Protection of Personal Information Act (POPIA)	6
9. Availability of the Manual (Section 51(3))	7

1. Introduction

- 1.1. Corion Capital (Pty) Ltd is an authorised financial services provider in terms of the Financial Advisory and Intermediary Services Act, 2002 ("FAIS"), and is regulated by the Financial Sector Conduct Authority ("FSCA"). Its FSP number is 44523.
- 1.2. Corion specialises in providing pioneering multi-strategy solutions for clients. Corion's reason for being is to provide its partners with the greatest chance of achieving their financial goals. Corion's investment philosophy is based on the principles that, over the long term, investors are rewarded for exposure to riskier assets; that, in the short to medium term, diversification mitigates the risks of cyclicalities; and that understanding the specific drivers of returns is critical to any investment decision.
- 1.3. This manual is published in terms of section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"), read together with the Protection of Personal Information Act, 2013 ("POPIA"), and describes the records held by Corion and the procedure for requesting access to those records.
- 1.4. Corion is committed to the letter and spirit of PAIA and POPIA, and to dealing with requests for access to information promptly, fairly and in accordance with the law.

2. Company Contact Details (Section 51(1)(a))

Item	Details
Information Officer	Simon du Plooy
Postal Address	Touchstone House, 7th Floor, 7 Bree Street, Cape Town, 8000 (with a further office at 45A 7th Avenue, Parktown North, Johannesburg, 2193)
Street Address	Touchstone House, 7th Floor, 7 Bree Street, Cape Town, 8000 (with a further office at 45A 7th Avenue, Parktown North, Johannesburg, 2193)
Telephone Number	021 831 5401
Email	sduplooy@corion.co.za
Website	www.corion.co.za

3. Access to Records (Section 51(1)(b))

- 3.1. The Promotion of Access to Information Act, 2000 ("PAIA"), grants a requester access to records of a private body if the records are required to exercise or protect a right of the requester. Where a public body lodges such a request, it must be acting in the public interest.
- 3.2. A request for information in terms of PAIA must be made in accordance with the prescribed form and manner, and on payment of the prescribed fees. The prescribed form and manner, and the applicable fees, are dealt with in sections 6 and 7 below.
- 3.3. Since 30 June 2021, the Information Regulator (established under the Protection of Personal Information Act, 2013 ("POPIA")) has assumed all regulatory functions in respect of PAIA that

were previously performed by the South African Human Rights Commission. Enquiries, complaints and requests for guidance in terms of PAIA should accordingly be directed to the Information Regulator.

3.4. The contact details of the Information Regulator are set out below.

Item	Details
Postal / Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Telephone Number	010 023 5200
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

3.5. Guidance on exercising rights under PAIA, including explanatory material and the prescribed forms referred to in section 6 below, is available on the Information Regulator's website and eServices portal.

4. Records Available in Terms of Other Legislation (Section 51(1)(c))

- 4.1. No records are made available automatically without a request having first been made in terms of this manual [Section 51(1)(c)].
- 4.2. The records that may be requested in terms of this manual are set out in the Schedule of Records in section 5 below [Section 51(1)(d)].

5. Schedule of Records (Section 51(1)(d))

5.1. Corion Capital holds the categories of records listed below.

5.1.1 Companies Act records

- Company registration documents and Memorandum of Incorporation
- Minutes and resolutions of board and shareholder meetings
- Records pertaining to the appointment of directors, auditors, the company secretary and other officers (where applicable)
- Share register and other statutory registers

5.1.2 Financial records

- Annual financial statements
- Tax returns
- Accounting records (journals and ledgers)
- Banking records and bank statements
- Register of fixed assets
- Invoices

5.1.3 Income tax and payroll records

- PAYE records and IRP5/IT3(a) certificates

- Salaries and wages records
- Records of payments made to SARS on behalf of employees
- Workmen's compensation records
- Other statutory compliance records (VAT, skills development levies, UIF, income tax, provisional tax)

5.1.4 Human resources records

- Employment contracts
- Salary records
- Leave records
- Job descriptions

5.1.5 Information technology records

- IT service agreements
- Accounting system records
- Hardware register
- Software licence register
- Internet service provider records
- Cybersecurity and IT incident records

5.1.6 Compliance and regulatory records

- FAIS licence and related FSCA correspondence
- Risk Management and Compliance Programme (RMCP)
- FICA internal rules and client due-diligence registers
- Compliance monitoring reports and the compliance manual
- Treating Customers Fairly (TCF) policy
- Conflict of Interest Management Policy and related register
- Complaints register
- Personal account trading register
- Gifts and entertainment register
- POPIA personal information processing registers and privacy notices
- PAIA/POPIA request log
- Business continuity plan
- Insurance policies

5.1.7 Client records

- Client agreements and investment mandates
- FICA/KYC records
- Investment instructions and correspondence
- Client complaints records

5.1.8 Governance records

- Board and committee minutes and resolutions
- Company policies

- Register of directors

6. Form of a Request for Information (Section 51(1)(e))

- 6.1. A requester must use the prescribed Form 2 (Request for Access to Record) under the PAIA Regulations, 2021, to request access to the information referred to in section 5 above. The previously used "Form C" was repealed with effect from the 2021 PAIA Regulations.
- 6.2. Form 2, and the related Form 3 (Notification of Outcome of Request and of Fees Payable), are obtainable from the Information Regulator's website (www.inforegulator.org.za) or its eServices portal.
- 6.3. The request must be addressed to the Information Officer indicated in section 2 above.
- 6.4. The requester must provide sufficient detail on Form 2 to enable the Information Officer to identify the requester, the record being requested, and the format in which access is required.
- 6.5. The requester must provide sufficient detail of their contact particulars, and, if the requester wishes to be informed of the decision in any manner in addition to writing, the manner and particulars thereof.
- 6.6. The requester must state the right they seek to exercise or protect and explain why the record is required for that purpose.
- 6.7. Once a decision has been made on the request, the requester will be notified of the outcome using Form 3.
- 6.8. If the request is granted, an access fee may be payable for the reproduction and preparation of the record, and for any search and preparation time in excess of the prescribed free hours.

7. Prescribed Fees (Section 51(1)(f))

- 7.1. A requester seeking access to a record containing personal information about that requester is not required to pay a request fee.
- 7.2. Every other requester must pay the prescribed request fee.
- 7.3. Where the preparation of a requested record requires more than the prescribed free hours (currently six), a deposit of up to one third of the applicable access fee may be required before the request is processed further. A requester may apply to a court against the requirement to pay a deposit or fee.
- 7.4. Records may be withheld pending payment of the applicable fees.
- 7.5. The prescribed fees are determined by the Minister of Justice and Correctional Development from time to time. The current fee schedule is published on the Information Regulator's website.

8. Interaction with the Protection of Personal Information Act (POPIA)

- 8.1. Corion Capital is a responsible party for the purposes of POPIA. Personal information collected in the ordinary course of business, including client and employee personal information, is processed in accordance with the company's internal personal information protection policies and applicable privacy notices.

- 8.2. A request for access to, or correction of, personal information held by the company about the requester (a data subject request) may be made in terms of POPIA in addition to, or instead of, a request under PAIA. Such requests should also be directed to the Information Officer named in section 2 above.
- 8.3. The Information Officer (and any deputy information officer appointed from time to time) is required to be registered with the Information Regulator in accordance with POPIA, and is responsible for the company's compliance with both PAIA and POPIA.
- 8.4. Where a request under this manual concerns the requester's own personal information, the company will have regard to both PAIA and POPIA in responding to the request.

9. Availability of the Manual (Section 51(3))

- 9.1. This manual is available for inspection, free of charge, at the offices of the company during ordinary business hours, upon prior arrangement with the Information Officer named in section 2.
- 9.2. A copy of this manual is also available on the company's website.
- 9.3. In accordance with the Information Regulator's guidance, private bodies are not required to submit their PAIA manuals to the Information Regulator, but must keep the manual available at their premises and on their website.

Approved on behalf of the company:

Name: Garreth Montano

Designation: Director

Signature: 

Date: 14 August 2026

Version Control

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Date of Compilation	18 January 2021
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