MURRAY & ROBERTS LIMITED

Company Registration No: 1979/003324/06

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

Use and Distribution :

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Effective Date : 17 September 2026

1. INTRODUCTION

1.1. The Murray & Roberts Limited (the "Company") Promotion of Access to Information Manual ("Manual") is published in terms of section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") as amended by the Protection of Personal Information Act 4 of 2013 ("POPIA").

1.2. PAIA gives effect to the provisions of section 32 of the Constitution, which provides for the right of access to information. A person that is entitled to exercise a right or who needs information for the protection of any right, is entitled to access that information, subject to certain restraints.

1.3. Section 51 of PAIA creates a legal right to access records (as defined in section 1 of PAIA) of a private body (both natural and juristic), however this right may be negated in circumstances as set out under Chapter 4 of Part 3 of PAIA. In addition, in compliance with POPIA a responsible party who processes personal information must notify the person to whom personal information relates ("Data Subject") of the manner in which the Data Subject can access their personal information held by the responsible party.

2. PURPOSE

2.1. The purpose of this Manual is to facilitate requests for access to records (including records containing personal information).

2.2. Where this Manual does not deal with a procedure provided for in PAIA, please refer to the PAIA Act for guidance in relation thereto. A person requesting access to records from the Company ("the Requester") is advised to familiarise themselves with the provisions of PAIA before making any requests to the Company in terms of PAIA.

2.3. The Company makes no representation and gives no undertaking or warranty that any record(s) provided to a Requester is complete or accurate, or that such record is fit for any purpose. All users of such records shall use such records entirely at their own risk, and the Company shall not be liable for any loss, expense, liability or claims, howsoever arising, resulting from the use of this Manual or of any record provided by the Company or any error therein.

3. COMPANY OVERVIEW

3.1. The Company is a public company established in 1979.

3.2. The Company's business is primarily engineering and construction contracting.

3.3. The Company voluntarily commenced business rescue proceedings on 22 November 2024, in accordance with Section 129(1) of the Companies Act 71 of 2008.

4. REQUIREMENTS IN TERMS OF PAIA

4.1. CONTACT DETAILS OF INFORMATION OFFICER

Information Officer	Joshua Cunliffe
Email Address	br@murrob.com
Postal Address	c/o Metis Strategic Advisors Jindal Africa Building 22 Kildoon Road Bryanston, 2191
Street Address	c/o Metis Strategic Advisors Jindal Africa Building 22 Kildoon Road Bryanston, 2191
Contact Number	082 692 5388

4.2. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.2.1. The Information Regulator has, in terms of section 10 of PAIA, updated and made available a Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available from the website of the Information Regulator (www.inforegulator.org.za/).

4.3. RECORDS AVAIALBLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

4.3.1. The Company publishes notices and documents regarding the business rescue proceedings of the Company on its website. Access to any other categories of records of the Company require a formal request to access such records.

4.4. RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION

4.4.1. The following legislation and regulations create the obligation to keep certain records:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Electronic Communication and Transaction Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

4.4.2. Such records will be made available to only those individuals/entities authorised to request access to such records in terms of the particular legislation. Any other persons must follow the request for access of records procedure as outlined in this Manual.

4.4.3. Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Where it comes to our attention that existing or new legislation allows a Requester access to information on a basis other than as set out in PAIA, we shall update the list accordingly. If the Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Company the opportunity of considering the request in light thereof.

4.5. CATEGORIES OF RECORDS HELD BY THE COMPANY

4.5.1. The categories of records typically held by the Company include: corporate and statutory records (including the memorandum of incorporation, share register, and board and shareholder resolutions and minutes); financial records (including annual financial statements, management accounts and tax records); records relating to the Company's business rescue proceedings (including the business rescue plan, correspondence with affected persons and creditors); commercial and contractual records (including client, supplier and tender/procurement records); human resources records (including employment contracts, payroll, employment equity and skills development records); and health, safety and environmental records, together with such further categories of records as are held pursuant to the legislation listed in paragraph 4.4.1 above.

4.6. PROCESSING OF PERSONAL INFORMATION

The Company processes personal information as follows:

4.6.1. **Categories of Data Subjects and personal information:** the Company processes personal information relating to employees, clients, suppliers, contractors, business partners, shareholders and other stakeholders,

including such contact, identification, financial and other personal information as is reasonably required for the purposes described below.

4.6.2. **Purpose of processing:** the purpose for which personal information is processed varies according to the nature of the relationship and the applicable legal or business requirement, and includes performing contractual obligations, complying with legal and regulatory requirements, administering employment and stakeholder relationships, and conducting the Company's business (including its business rescue proceedings).

4.6.3. **Recipients of personal information:** personal information may be shared with the Company's professional advisors, auditors, regulators and other persons or authorities authorised to receive such information, in each instance only to the extent reasonably necessary for the purposes described above.

4.6.4. **Cross-border transfers:** given the historic scale and geographic footprint of the Company's operations, most personal information is stored on cloud-based servers, unless physical records are required to be held. To the extent personal information is transferred to, or stored or accessed in, a location outside of South Africa, such transfer takes place subject to the requirements of POPIA.

4.6.5. **Security safeguards:** the Company applies reasonable technical and organisational security measures, appropriate to the nature of the personal information concerned, to safeguard its integrity and confidentiality against loss, damage, unauthorised access or unlawful processing.

4.7. CONTACT DETAILS OF THE INFORMATION REGULATOR

4.7.1. Requesters, third parties and data subjects may contact the Information Regulator, which is responsible for the administration and enforcement of both PAIA and POPIA, at:

Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Postal address: P.O. Box 31533, Braamfontein, 2017

Telephone: 010 023 5200 (Toll-free: 0800 017 160)

Email: enquiries@inforegulator.org.za

Website: www.inforegulator.org.za

5. ACCESS TO RECORDS AND REQUEST PROCEDURES

5.1. INTRODUCTION

5.1.1. Access to records held by the Company is not automatic and can be refused by the Company on any of the grounds for refusal contemplated in PAIA.

5.1.2. In order to request access to records held by the Company, the Requester must not only identify the right it is seeking to exercise or protect and explain why the record requested is required for the exercise or protection of that right but must also comply with all the procedural requirements set out in PAIA.

5.1.3. If the Requester requests information on behalf of a public body (i.e. the state), the Requester must identify that the request for information is in the public's interest by stipulating adequate reasons.

5.1.4. If the Requestor is making a request on behalf of another person, sufficient proof (to the satisfaction of the Company) of the capacity in which the Requestor is making the request/acting must be submitted. The type of proof required will be advised by the Company upon receipt of such request.

5.2. PROCEDURAL REQUIREMENTS

5.2.1. In order to facilitate such a request for access to records, the Requester needs to complete the *"Form 2 Request for Access to Record"* ("Access Form"), as attached. The prescribed Access Form (Form 2) must be completed in full. If not, the process may be delayed until such additional information has been provided.

5.2.2. In terms of POPIA, adequate proof of identity is required from the Requestor. Therefore, in addition to the prescribed Access Form (Form 2), the Requestor will be required to supply a certified copy of their identification document or any other legally acceptable form of identification.

5.2.3. The Access Form (Form 2) and proof of identity must be provided to the Information Officer of the Company at the physical address or e-mail set out above. The Company may, in its sole discretion, request that original certified copies be provided in certain circumstances, such as if the electronic copies provided are not clear or are questionable.

5.2.4. The Requester must provide sufficient detail on the prescribed Access Form (Form 2) to enable the Information Officer to identify the record requested. When completing the prescribed Access Form (Form 2), the Requester should also indicate:

- which form of access is required;
- the right the Requester is seeking to exercise or protect and explain why the requested record is required for the exercise or protection of that right;
- whether the Requester wishes to be informed of the decision in any other manner, in addition to a written reply, to state the manner and necessary particulars to be so informed; and
- an email address, telephonic contact numbers and postal address in South Africa.

5.2.5. If a request is made on behalf of another person, the Requester must show, to the reasonable satisfaction of the Company, that he or she is duly authorised to make such request.

5.2.6. If an individual is unable to complete the prescribed Access Form (Form 2) because of illiteracy or disability, such an individual may make the request verbally.

5.2.7. The prescribed Access Form (Form 2) must be adequately completed, with sufficient information particularly so that the Company can identify and determine what the access fee will be, should access be granted.

5.2.8. A request will not be processed until the request fee has been paid.

5.3. REFUSAL IN TERMS OF PAIA

5.3.1. The Company may refuse access to the requested record or parts thereof as allowed in terms of Chapter 4 of PAIA.

5.3.2. In instances whereby a third party needs to be notified of a request in order to authorise or decline access, the Company undertakes to request same from the third party within 21 days of receipt of the request and to include the required information provided for in terms of PAIA.

5.3.3. In the event that the request is declined by the third party, the Company cannot be held responsible for same.

5.4. NOTIFICATION OF REFUSAL OR GRANTING OF ACCESS TO INFORMATION

5.4.1. Requestors will be informed within 30 days of receipt of the prescribed Access Form (Form 2) if the Company's decision is to refuse access to the information requested based on any of the grounds for refusal as contemplated in PAIA. The 30 day period may be extended for a further 30 day period should more time be required to gather the requested information. The Requester will be notified if the initial 30 day notice period is to be extended for a further 30 days.

5.5. REMEDIES AVAILABLE TO REQUESTER ON REFUSAL OF ACCESS

5.5.1. There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Company is final. In the event that you are not satisfied with the outcome of the request, you are entitled to submit a complaint to the Information Regulator, or to apply to a court of competent jurisdiction, for appropriate relief.

5.6. IF RECORD CANNOT BE FOUND

5.6.1. If all reasonable steps have been taken by the Company to find the record requested by the Requester and same cannot be found for justifiable reasons, the Company shall provide an affidavit or affirmation to the Requester advising that it is not possible to give access to the record requested.

5.6.2. In the event the record is subsequently found, the Company undertakes to contact the Requester in order to gain access to same, subsequent to the payment of the applicable access fees

6. FEES

6.1. There are two basic types of fees applicable in terms of PAIA, namely "Request" and "Access" fees.

6.2. REQUEST FEE

6.2.1. The Request Fee is an administration fee that is payable on submission of the request for access to a record and must be paid before the request is considered (unless the request is to access the Requestor's personal

information in which event there is no applicable fee). The Request Fee is not refundable, regardless of whether the request for access is granted or refused. Where a deposit has been paid in terms of paragraph 6.3.3 below and the request for access is refused, that deposit will be refunded to the Requester in accordance with section 54(4) of PAIA.

6.2.2. The Request Fee is currently statutorily set at R50 for a private body.

6.2.3. In line with POPIA, a Data Subject has a right to request the Company to confirm, free of charge, whether or not the Company holds personal information about the Data Subject.

6.3. ACCESS FEE

6.3.1. The Access Fee is payable prior to the Requester actually gaining access to the records in the required form.

6.3.2. The Access Fee is intended to reimburse the Company for the costs involved in reproduction of documents, searching and preparing the record requested and for any time reasonably required (in excess of the prescribed hours) to search and prepare the record.

6.3.3. Should the preparation of the required record take more than 6 hours, a deposit of a third of the Access Fee is payable before the request will be processed by the Company.

6.3.4. The Company may withhold a record until the Requester has paid the applicable fees.

6.3.5. In accordance with Section 23(3) of POPIA, the Company may charge an Access Fee to a Data Subject to enable the Company to respond to the request. In such instances the Company must provide the Data Subject with a written estimate of the fee before providing the services.

7. NOTICES

7.1. Where the Company requires payment of a Request fee or a deposit, the Company shall provide the Requester with a notice to that effect .

7.2. Once the Request Fee has been paid in full, the Company will consider the request for access and will provide the Requester with its decision to the request (“Decision Notice”).

8. AVAILABILITY OF THE MANUAL

8.1. This Manual is available for inspection, free of charge, at the offices of the Company.

Joshua Cunliffe
Information Officer

17 September 2026
Date

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

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.*

TO: The Information Officer

_____
_____
_____
_____
(Address)

E-mail address: _____

Fax number: _____

*Mark with an **"X"***

☐ Request is made in my own name ☐ Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made *(when made on behalf of another person)*				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				
Postal Address				

Street Address				
E-mail Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED

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. (*If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD
*(Mark the applicable box with an "**X**")*

Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS *(Mark the applicable box with an "**X**")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(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)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *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	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	**Facsimile**	**Electronic communication** ***(Please specify)***

Signed at _____ this _____ day of _____ 20 _____

_____

Signature of Requester / person on whose behalf request is made

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FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

_____

Signature of Information Officer