



TENOVA ENERGY (PTY) LTD

PAIA MANUAL

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

Registration No. 2026/007850/07

17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa

PO Box 204, Emgwenya, Mpumalanga 1195, South Africa

Email: info@tenova.energy

Website: <https://www.tenova.energy>

Effective date / Last updated: 26 September 2026

COMPLETION NOTE

Before publication, insert the full name and direct contact details of Tenova Energy's registered Information Officer and any formally designated Deputy Information Officer(s). Confirm the final record categories against the company's actual records.

1. INTRODUCTION

- 1.1 This Manual is prepared by Tenova Energy (Pty) Ltd ("Tenova Energy" or "the Company"), a private body, in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended ("PAIA").
- 1.2 PAIA gives effect to the constitutional right of access to information and provides a process through which a person may request access to records held by a private body where the record is required for the exercise or protection of a right, subject to the requirements and grounds of refusal contained in PAIA.
- 1.3 This Manual describes Tenova Energy's contact details, the categories of records it holds or may hold, the procedure for requesting access, records that may be available without a formal PAIA request, applicable legislation, and information relating to the processing of personal information under the Protection of Personal Information Act 4 of 2013 (POPIA).
- 1.4 The existence of a category of record in this Manual does not mean that every record in that category exists or that access will automatically be granted. Each request is considered in accordance with PAIA and other applicable law.

2. PARTICULARS OF TENOVA ENERGY

Registered name	Tenova Energy (Pty) Ltd
Registration number	2026/007850/07
Nature of body	Private company incorporated in South Africa
Physical address	17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa
Postal address	PO Box 204, Emgwenya, Mpumalanga 1195, South Africa
Website	https://www.tenova.energy
General email	info@tenova.energy

3. INFORMATION OFFICER AND ACCESS CONTACTS

3.1 For a private body, the head of the body is the Information Officer by virtue of PAIA and POPIA, subject to the applicable statutory definitions and any lawful designation or delegation.

3.2 Tenova Energy's registered Information Officer details must be inserted below before this Manual is published:

Information Officer	JM Opperman
Position / capacity	Director
Telephone	+27 76 792 1852
Email	info@tenova.energy
Physical address	17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa

3.3 If Tenova Energy designates one or more Deputy Information Officers, their names and contact details must be added to this Manual and kept current.

3.4 General access-to-information enquiries may be sent to info@tenova.energy until a dedicated PAIA contact address is formally published.

3.5 The Information Officer and any Deputy Information Officer must be registered with the Information Regulator as required before taking up the applicable POPIA duties.

4. THE INFORMATION REGULATOR'S PAIA GUIDE

4.1 The Information Regulator has, in terms of section 10 of PAIA, made available a Guide explaining how to exercise rights under PAIA and POPIA.

4.2 The Guide includes information on the objects of PAIA, contact details of Information Officers, the manner and form of requests, assistance available from the Regulator, remedies, applicable fees, and other information that may assist a person wishing to exercise a right under PAIA.

4.3 The Guide is available from the Information Regulator and is published in the official languages and in braille as provided by the Regulator.

4.4 Information Regulator contact details at the date of this Manual are:

Information Regulator (South Africa)
 Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
 PO Box 31533, Braamfontein, Johannesburg, 2017
 Telephone: 010 023 5200
 Email: enquiries@inforegulator.org.za
 Website: <https://inforegulator.org.za>

4.5 The Regulator's details and prescribed forms may change. Requesters should use the current forms and contact details published by the Information Regulator.

5. RECORDS THAT MAY BE AVAILABLE WITHOUT A FORMAL PAIA REQUEST

5.1 Certain information is ordinarily made available by Tenova Energy without requiring a formal PAIA request, subject to availability and any applicable confidentiality, intellectual-property, privacy or legal restrictions.

5.2 publicly available information on the Tenova Energy website;

- 5.3 company registration and other corporate information lawfully available through public registers;
- 5.4 published Privacy Policy, Cookie Policy, Website Terms & Conditions and Investor & Financial Disclaimer;
- 5.5 this PAIA Manual and information on how to make a PAIA request;
- 5.6 public brochures, presentations, media releases and marketing material authorised for public distribution;
- 5.7 publicly released project and corporate information; and
- 5.8 information that Tenova Energy is required by law to make publicly available.
- 5.9 The fact that a record falls within a listed category does not mean that all underlying or related records are automatically available.

6. RECORDS HELD BY TENOVA ENERGY

- 6.1 Subject to the Company's actual activities and record holdings, Tenova Energy may hold records in the following categories:
 - 6.1.1 **Corporate and statutory records:** incorporation and CIPC records; memorandum of incorporation; securities and beneficial-ownership records; board and shareholder resolutions and minutes; statutory registers; governance policies; delegations; licences and corporate approvals.
 - 6.1.2 **Financial and accounting records:** annual financial statements; management accounts; banking records; invoices; receipts; tax records; budgets; asset registers; insurance records; audit and accounting records.
 - 6.1.3 **Human resources records:** employee and contractor records; contracts; payroll and remuneration information; leave and attendance records; training; performance; disciplinary and health-and-safety records, where applicable.
 - 6.1.4 **Commercial and contractual records:** customer, supplier, contractor, consultant, partner and service-provider agreements; confidentiality agreements; proposals; quotations; procurement records; due-diligence records; correspondence and transaction documentation.
 - 6.1.5 **Project and property records:** project plans; site information; land or property documentation; development records; feasibility material; project schedules; stakeholder correspondence; approvals and project administration records.
 - 6.1.6 **Technology, engineering and intellectual-property records:** technical specifications; designs; process information; research and development records; know-how; software; drawings; engineering reports; licences; intellectual-property records; technology-provider documentation.
 - 6.1.7 **Environmental, health and safety records:** environmental assessments and authorisations; monitoring information; waste and feedstock records; health-and-safety documentation; incident records; compliance and sustainability information, where applicable.
 - 6.1.8 **Operational records:** operating procedures; plant and equipment records; maintenance information; production and quality records; logistics; feedstock and product information; inventory and operational reports, where applicable.
 - 6.1.9 **Investor and funding records:** investor correspondence; pitch materials; due-diligence information; financing proposals; funding records; valuations; forecasts; transaction documents and shareholder communications.
 - 6.1.10 **Legal, regulatory and compliance records:** legal opinions; litigation records; regulatory correspondence; compliance policies; risk registers; FICA/KYC/KYB records where lawfully required; POPIA and PAIA compliance records.
 - 6.1.11 **Information technology and security records:** IT policies; access-control records; system logs; software and hosting records; cybersecurity records; backups; incident records; vendor and system documentation.
 - 6.1.12 **Privacy and personal-information records:** data-subject requests; consent and preference records; privacy notices; processing records; operator agreements; security-compromise records; retention records and privacy impact assessments where applicable.
 - 6.1.13 **Communications and marketing records:** website content; approved branding; photographs; videos; media releases; marketing campaigns; newsletters; social-media and public-relations records.
- 6.2 Some records may contain confidential, privileged, commercially sensitive, personal or third-party information and may therefore be subject to mandatory or discretionary grounds of refusal under PAIA.

7. RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION

- 7.1 Where applicable to Tenova Energy's activities, records may be retained or made available in accordance with legislation including, without limitation:
 - 7.2 Companies Act 71 of 2008;
 - 7.3 Income Tax Act 58 of 1962;
 - 7.4 Tax Administration Act 28 of 2011;
 - 7.5 Value-Added Tax Act 89 of 1991, if applicable;
 - 7.6 Basic Conditions of Employment Act 75 of 1997, if applicable;
 - 7.7 Labour Relations Act 66 of 1995, if applicable;
 - 7.8 Employment Equity Act 55 of 1998, if applicable;
 - 7.9 Occupational Health and Safety Act 85 of 1993, if applicable;
 - 7.10 Compensation for Occupational Injuries and Diseases Act 130 of 1993, if applicable;
 - 7.11 Unemployment Insurance Act 63 of 2001, if applicable;
 - 7.12 Electronic Communications and Transactions Act 25 of 2002;
 - 7.13 Consumer Protection Act 68 of 2008, where applicable;

- 7.14 Protection of Personal Information Act 4 of 2013;
- 7.15 Promotion of Access to Information Act 2 of 2000;
- 7.16 National Environmental Management Act 107 of 1998 and applicable specific environmental management legislation, where applicable;
- 7.17 Financial Intelligence Centre Act 38 of 2001, only to the extent applicable to the Company's activities; and
- 7.18 any other legislation, regulation, licence, permit or authorisation applicable to Tenova Energy's operations from time to time.
- 7.19 This list is not intended to be exhaustive and does not imply that every listed statute applies to every Tenova Energy activity.

8. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

- 8.1 Tenova Energy processes personal information for lawful business, contractual, legal, security, governance, project, employment, supplier, investor, customer and website-related purposes as more fully described in its Privacy Policy.
- 8.2 Categories of data subjects may include employees and contractors; directors and shareholders; customers and prospective customers; suppliers and service providers; business partners; investors and prospective investors; website visitors; regulators; professional advisers; landowners; project stakeholders; and representatives of juristic persons.
- 8.3 Categories of personal information may include identification and contact details; employment and professional information; financial and transaction information; company and beneficial-ownership information; correspondence; contractual information; website and device data; and verification or compliance information where lawfully required.
- 8.4 Personal information may be disclosed to authorised personnel, professional advisers, auditors, banks, insurers, IT and cloud providers, payment or verification providers, project counterparties, regulators, courts and other recipients where lawful and necessary.
- 8.5 Where operators process personal information for Tenova Energy, appropriate contractual and security measures will be implemented where required by POPIA.
- 8.6 Personal information may be transferred outside South Africa only in accordance with section 72 of POPIA and the safeguards described in the Tenova Energy Privacy Policy.
- 8.7 Tenova Energy will implement appropriate, reasonable technical and organisational security safeguards as required by POPIA.
- 8.8 Further information concerning purposes, retention, security, data-subject rights and complaints appears in Tenova Energy's Privacy Policy.

9. HOW TO REQUEST ACCESS TO A RECORD

- 9.1 A request for access to a record of Tenova Energy must be made using the prescribed PAIA Form 2: Request for Access to Record, unless the law permits another method in the circumstances.
- 9.2 The completed Form 2 should be submitted to Tenova Energy's Information Officer at the contact details stated in section 3 of this Manual.
- 9.3 The requester must provide sufficient particulars to enable Tenova Energy to identify the requester and the requested record, and must identify the right the requester seeks to exercise or protect and explain why the requested record is required for that purpose, as required for access to a private body's record under PAIA.
- 9.4 Proof of identity must accompany the request. If a request is made on behalf of another person, proof of authority to act for that person must also be supplied.
- 9.5 The requester should identify the preferred form of access and provide appropriate contact details.
- 9.6 Tenova Energy will provide reasonable assistance to a requester where PAIA requires such assistance.
- 9.7 The current prescribed Form 2 can be obtained from the Information Regulator's official website.

10. FEES

- 10.1 A requester may be required to pay the request, search, preparation, reproduction, postage or other fees prescribed under PAIA and its regulations, subject to any applicable exemptions.
- 10.2 Where a fee is payable before further processing or access, Tenova Energy will notify the requester in the prescribed or legally appropriate manner.
- 10.3 Tenova Energy will apply the fee structure prescribed by law at the time of the request rather than reproduce amounts in this Manual that may later become outdated.

11. DECISION ON A REQUEST

- 11.1 Tenova Energy will consider a properly submitted request and notify the requester of its decision within the period prescribed by PAIA, ordinarily 30 days after receipt, subject to any lawful extension.
- 11.2 Where PAIA permits an extension, the requester will be informed of the extension and the reasons for it.
- 11.3 If access is granted, the notice will address the applicable fee and manner in which access will be provided.
- 11.4 If access is refused, Tenova Energy will provide the reasons required by PAIA and inform the requester of available remedies.
- 11.5 If a requested record cannot be found or does not exist, Tenova Energy will deal with the request in accordance with PAIA.

12. GROUNDS FOR REFUSAL

- 12.1 Access may be refused where PAIA requires or permits refusal. Depending on the record and circumstances, this may include protection of:

- 12.2 the privacy of a third party who is a natural person;
- 12.3 commercial information of a third party;
- 12.4 confidential information of a third party;
- 12.5 the safety of individuals and protection of property;
- 12.6 records privileged from production in legal proceedings;
- 12.7 Tenova Energy's own commercial information, including trade secrets and information that could cause commercial harm;
- 12.8 research information in circumstances protected by PAIA; and
- 12.9 other information protected by a mandatory or discretionary ground of refusal in PAIA.
- 12.10 Where only part of a record is protected and the remainder can reasonably be severed, Tenova Energy will consider providing access to the severable portion as required by PAIA.
- 12.11 A ground of refusal will not be applied where PAIA requires disclosure in the public interest or otherwise requires access.

13. THIRD-PARTY NOTIFICATION

- 13.1 Where a request relates to information concerning a third party and PAIA requires consultation or notification, Tenova Energy may notify the affected third party and follow the statutory third-party procedure before deciding the request.
- 13.2 A third party may make representations or exercise remedies available under PAIA.

14. REMEDIES AND COMPLAINTS

- 14.1 A private body does not provide the same internal appeal procedure that applies to certain public bodies.
- 14.2 A requester or affected third party who is dissatisfied with Tenova Energy's response or non-response may, subject to PAIA and applicable time limits, lodge a complaint with the Information Regulator or approach a competent court.
- 14.3 The Information Regulator's current PAIA complaint procedure uses prescribed Form 5. The requester should consult the Regulator's official website for the current form and submission method.
- 14.4 The Regulator generally expects a requester first to have submitted the prescribed access request to the body and given the body an opportunity to respond before the complaint procedure is used.

15. AVAILABILITY OF THIS MANUAL

- 15.1 This Manual will be made available on the Tenova Energy website at <https://www.tenova.energy>.
- 15.2 A copy should also be made available for inspection at Tenova Energy's principal office during reasonable business hours, subject to appropriate arrangements.
- 15.3 A copy will be supplied on request subject to any fee lawfully prescribed.
- 15.4 Tenova Energy will take reasonable steps to make the Manual accessible in the manner and languages required by applicable PAIA regulations and Information Regulator requirements.
- 15.5 Tenova Energy may also upload or submit its PAIA Manual through the Information Regulator's eServices facilities where required or appropriate.

16. UPDATING THE MANUAL

- 16.1 Tenova Energy will review and update this Manual when its record holdings, Information Officer details, legal obligations, business activities or PAIA requirements materially change.
- 16.2 The latest approved version should display its effective or last-updated date.
- 16.3 The Information Officer is responsible for ensuring that the Manual is maintained and made available as prescribed.

17. CONTACT

- 17.1 PAIA requests and enquiries should be directed to:

Information Officer
 Tenova Energy (Pty) Ltd
 Registration No. 2026/007850/07
 17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa
 PO Box 204, Emgwenya, Mpumalanga 1195, South Africa
 Email: info@tenova.energy
 Website: <https://www.tenova.energy>

APPENDIX A - PAIA REQUEST PROCESS

1. Identify the record required and the right that the record is required to exercise or protect.
2. Obtain the current prescribed PAIA Form 2 from the Information Regulator.
3. Complete Form 2 fully and attach proof of identity. If acting for another person, attach proof of authority.
4. Submit the request to Tenova Energy's Information Officer using the contact details in this Manual.
5. Pay any fee lawfully requested in accordance with the current PAIA fee regulations.
6. Tenova Energy will consider the request and ordinarily respond within 30 days, subject to any lawful extension.
7. If access is granted, comply with the access arrangements and applicable fees stated in the decision notice.
8. If dissatisfied with the response or non-response, consider the complaint procedure to the Information Regulator or a court remedy available under PAIA.

APPENDIX B - FORMS AND OFFICIAL RESOURCES

Resource	Purpose
Form 2	Request for Access to Record - Regulation 7
Form 3	Outcome of Request and Fees Payable - Regulation 8
Form 5	Complaint Form - Regulation 10
PAIA Guide	Guide on how to use PAIA issued by the Information Regulator
Private Body Manual Template	Information Regulator template for a section 51 PAIA Manual

Official source: Information Regulator (South Africa) - <https://inforegulator.org.za/paia/>

APPENDIX C - TENOVA ENERGY COMPLETION CHECKLIST

1. Insert the full name, position, telephone number and email address of the registered Information Officer.
2. Add every formally designated Deputy Information Officer, if any.
3. Confirm Information Officer / Deputy Information Officer registration on the Information Regulator eServices portal.
4. Confirm the record categories in section 6 against Tenova Energy's actual records and remove categories that do not apply.
5. Confirm which legislation in section 7 actually applies to current Tenova Energy operations.
6. Publish the final Manual on www.tenova.energy and keep a physical copy available at the office.
7. Assess the Information Regulator's current language requirements and make the Manual available in the required languages.
8. Keep the current PAIA Form 2 accessible from the website Legal / PAIA section or link users to the Regulator's official form.
9. Maintain an internal PAIA request register and preserve requests, decisions, fees, correspondence and outcomes.
10. Submit PAIA annual reporting through the Information Regulator eServices portal when required by the Regulator.
11. Review the Manual whenever the Information Officer, address, business activities, record categories or applicable laws materially change.

APPENDIX D - DRAFTING NOTE

This Manual follows the structure and subject matter of the Information Regulator's private-body PAIA Manual template and current PAIA resources. It has been tailored to Tenova Energy's known corporate, project, technology, investor and website context. Items shown in square brackets require confirmation before publication. The final Manual should reflect the records Tenova Energy actually holds and the legislation that actually applies to its operations.