



PAIA MANUAL

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

CONTENTS

1.	DEFINITIONS	3
2.	PURPOSE OF PAIA MANUAL	3
3.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION	4
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE	4
5.	CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.....	6
6.	DESCRIPTION OF THE RECORDS OF THE COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	6
7.	DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY	7
8.	PROCESSING OF PERSONAL INFORMATION	8
9.	PROCEDURE FOR REQUESTING ACCESS TO INFORMATION	10
10.	REFUSAL OF ACCESS.....	11
11.	FEES PAYABLE IN TERMS OF SECTION 51 (1)(f).....	12
12.	AVAILABILITY OF THE MANUAL	13
13.	UPDATING OF THE MANUAL	13

1. DEFINITIONS

DEFINITION	DESCRIPTION
The Company	Means any company within the EnviroServ group of companies, which include Umzwilili Environmental Solutions (Pty) Ltd (Reg No. 2021/764541/07) and one or all of its South African Subsidiaries, as the context may indicate
CEO	Chief Executive Officer
DIO	Deputy Information Officer
EnviroServ Group	Shall mean Umzwilili Environmental Solutions (Pty) Ltd (Reg No. 2021/764541/07) and its Subsidiaries, collectively
Effective date	1 st January 2026
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa
Subsidiaries	Shall include the following Umzwilili Group entities: EnviroServ Holdings (Pty) Ltd (Reg. No. 2007/026507/07) EnviroServ Africa Holdings Limited (Reg No. 1994/000280/06) EnviroServ Waste Management (Pty) Ltd (Reg. No. 2008/021152/07) OETSERV (Pty) Ltd (Reg. No. 2022/557949/07); and ABHIR SERV (Pty) Ltd (Reg No. 2021/535315/07)

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1. check the categories of records held by the Company which are available without a person having to submit a formal PAIA request;
- 2.2. have sufficient understanding of how to make a request for access to a record of the Company, by providing a description of the subject(s) on which the Company holds records and the categories of records held on each subject;
- 2.3. know the description of the records of the Company which are available in accordance with any other legislation;
- 2.4. access all the relevant contact details of the Information Officer and Deputy Information Officer(s) who will assist the public with the records they intend to access;
- 2.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6. know if the Company will process personal information, the purpose of processing personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8. know the recipients or categories of recipients to whom the personal information may be supplied;

- 2.9. know if the Company has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10. know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

The contact details of the Information Officer and Deputy Information Officer(s) responsible for dealing with all requests for information in terms of PAIA on behalf of the Company and responsible for the Company's compliance with both PAIA and POPIA are set out hereunder:

Information Officer Name	Esme Gombault
Job Title:	Group Chief Executive Officer
Deputy Information Officer Name:	André Otto
Job Title	Head: Information Technology
Deputy Information Officer Name:	Bianca Fearick
Job Title:	Head: Legal and Corporate Governance
Postal Address:	PO Box 1547 Bedfordview 2008
Street Address:	Brickfield Road Meadowdale Germiston 1401
Telephone:	+27 11 456 5660
E-Mail:	Information.officer@enviroserv.co.za
Website:	www.enviroserv.co.za

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

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised 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.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form required for a request for-

- 4.3.3.1. access to a record of a public body contemplated in section 11 of PAIA; and
- 4.3.3.2. access to a record of a private body contemplated in section 50 of PAIA
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- a) any matter which is required or permitted by this Act to be prescribed;
- b) any matter relating to the fees contemplated in sections 22 and 54;
- c) any notice required by this Act;
- d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

5. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

CATEGORY OF RECORDS	TYPES OF RECORDS	AVAILABLE ON WEBSITE	AVAILABLE UPON REQUEST
Industries		X	X
Services		X	
EnviroServ Contact Information		X	
Privacy Policy			X
Ethics Policy			X
Supplier Code of Conduct			X
Whistleblower Policy			X

6. DESCRIPTION OF THE RECORDS OF THE COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION, AS AMENDED

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
	Basic Conditions of Employment Act 75 of 1997
	Broad Based Black Economic Empowerment Act 53 of 2003
Memorandum Of Incorporation	Companies Act 71 of 2008
	Compensation for Occupational Injuries and Diseases Act 130 of 1993
	Competitions Act 89 of 1998
	Electronic Communications and Transactions Act, 25 of 2002
	Employment Equity Act 55 of 1998
	National Health Act 61 of 2003
	Income Tax Act 53 of 1962
	Labour Relations Act 66 of 1995
	National Environmental Management Act 107 of 1998 National Environmental Management Air Quality Act 39 of 2004

	National Environmental Management: Waste Act 59 of 2008
	National Water Act 36 of 1998
	Occupational Health and Safety Act 85 of 1993
	Pension Funds Act 24 of 1956
PAIA Manual	Promotion of Access to Information Act 2 of 2000
	Protected Disclosures Act, 26 of 2000
	Protection of Personal Information Act 4 of 2013
	Regulation of Interception of Communications and Provision of Communication-related Information Act (RICA) 70 of 2002
	Skills Development Act 97 of 1998
	Skills Development Levies Act 9 of 1999
	Unemployment Insurance Act 63 of 2001
	Value-Added Tax Act 89 of 1991
	Cybercrimes Act 19 of 2020

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY

SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS	CATEGORIES OF RECORDS
Statutory and Legal	<ul style="list-style-type: none"> • Annual Reports, Strategic Plan, Annual Performance Plan. • statutory registers • annual reports • statutory Records & returns, including incorporation documents, memorandum of incorporation and share register • minutes of meetings • Board resolutions, • board and statutory committees • management committees • contractual and legal agreements • intellectual property: trademark certificates • licences • copyrights & designs • health and safety records
Human Resources	<ul style="list-style-type: none"> • HR policies & procedures • employment equity plan and report • skills development plan and report • employee records • benefits • IR disciplinary and grievance procedures and hearings, including CCMA Records • Union negotiation Records • incentive scheme rules
Administration, Finance & Accounting	<ul style="list-style-type: none"> • accounting records • auditors reports • tax returns • VAT returns • policies & procedures
Retirement Fund	<ul style="list-style-type: none"> • pension and provident fund rules • correspondence • statutory records and returns
Insurance	<ul style="list-style-type: none"> • policies, including coverage, limits and insurers

Information Technology	<ul style="list-style-type: none"> • claim records • hardware • software packages • licences • IT policies and procedures • operating systems
Sales and Marketing	<ul style="list-style-type: none"> • customer records • credit application forms • statements of account • terms & conditions • marketing material and media releases: brochures, newsletters and advertising materials
Assets	<ul style="list-style-type: none"> • leases
Operational Information	This information can be defined as information needed in the day-to-day running of the organization. (Examples of such information are: internal telephone lists, address lists, company policies, company procedures, employee handbook, administration manual, industry related statistical data, data subject databases, management information reports and lease agreements.)

8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information



South Africa’s largest waste management company, EnviroServ has been operating since 1979, headquartered in Gauteng, with depots around the country and regional branches in Mozambique and Uganda

We offer cost-effective solutions to complex hazardous and non-hazardous waste and chemical pollution problems, providing peace of mind around legal compliance, safe handling, transportation and treatment. We were first to market with many waste management solutions, some of which are still recognized as best practice.

After more than four decades in business we remain pioneers because the drive to look for better ways of doing things is deeply embedded in our culture. We were established by forward thinkers with a social conscience - the kinds of people we still employ today. In addition, by being the first – and for long periods – the only company to tackle complex waste management issues in South Africa, we’ve come to understand that sustainable waste management evolves with society’s needs, habits, and awareness of health and environmental prosperity. We have had to keep evolving to deal with new lifestyles and technologies leading to new and increased waste streams, as well as updated legislation.

We are dedicated to delivering innovative waste solutions that are environmentally responsible, effective and economically viable so that our customers can enhance sustainability and achieve environmental peace of mind.

8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Customers / Clients	name, address, registration numbers, BBBEE certification
Service Providers	names, registration number, vat numbers, address,

	trade secrets and bank details, BBBEE certification
Employees	address, qualifications, gender, race, identity numbers, employment status and bank details
Shareholders, Affiliates and Ultimate Beneficial Ownership	names, registration number, vat numbers, address, trade secrets and bank details, BBBEE certification, address, qualifications, gender, race, identity numbers, employment status and bank details

8.3. The recipients or categories of recipients to whom the personal information may be supplied

CATEGORY OF PERSONAL INFORMATION	RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4. Planned transborder flows of personal information

TYPE OF FLOW	REGION
Flows to the Company’s cloud-based ERP solutions	Europe and South Africa
Flows to the Company’s cloud-based collaboration platforms	Europe and South Africa
Flows to the Company’s majority share holder	Europe

8.5. General description of Information Security Measures to be implemented by the Responsible Party to ensure confidentiality, integrity and availability of the information

<p>GOVERN (GV): The organization's cybersecurity risk management strategy, expectations, and policy are established, communicated, and monitored</p>	<p>Organizational Context (GV.OC): The circumstances - mission, stakeholder expectations, dependencies, and legal, regulatory, and contractual requirements - surrounding the organization's cybersecurity risk management decisions are understood</p>
	<p>Risk Management Strategy (GV.RM): The organization's priorities, constraints, risk tolerance and appetite statements, and assumptions are established, communicated, and used to support operational risk decisions</p>
	<p>Roles, Responsibilities, and Authorities (GV.RR): Cybersecurity roles, responsibilities, and authorities to foster accountability, performance assessment, and continuous improvement are established and communicated</p>
	<p>Policy (GV.PO): Organizational cybersecurity policy is established, communicated, and enforced</p>
	<p>Oversight (GV.OV): Results of organization-wide cybersecurity risk management activities and performance are used to inform, improve, and adjust the risk management strategy</p>
	<p>Cybersecurity Supply Chain Risk Management (GV.SC): Cyber supply chain risk management processes are identified, established, managed, monitored, and improved by organizational stakeholders</p>
<p>IDENTIFY (ID): The organization's current cybersecurity risks are understood</p>	<p>Asset Management (ID.AM): Assets (e.g., data, hardware, software, systems, facilities, services, people) that enable the organization to achieve business purposes are identified and managed consistent with their relative importance to organizational objectives and the organization's risk strategy</p>
	<p>Risk Assessment (ID.RA): The cybersecurity risk to the organization, assets, and individuals is understood by the organization</p>

	Improvement (ID.IM): Improvements to organizational cybersecurity risk management processes, procedures and activities are identified across all CSF Functions
PROTECT (PR): Safeguards to manage the organization's cybersecurity risks are used	Identity Management, Authentication, and Access Control (PR.AA): Access to physical and logical assets is limited to authorized users, services, and hardware and managed commensurate with the assessed risk of unauthorized access
	Awareness and Training (PR.AT): The organization's personnel are provided with cybersecurity awareness and training so that they can perform their cybersecurity-related tasks
	Data Security (PR.DS): Data are managed consistent with the organization's risk strategy to protect the confidentiality, integrity, and availability of information
	Platform Security (PR.PS): The hardware, software (e.g., firmware, operating systems, applications), and services of physical and virtual platforms are managed consistent with the organization's risk strategy to protect their confidentiality, integrity, and availability
	Technology Infrastructure Resilience (PR.IR): Security architectures are managed with the organization's risk strategy to protect asset confidentiality, integrity, and availability, and organizational resilience
DETECT (DE): Possible cybersecurity attacks and compromises are found and analysed	Continuous Monitoring (DE.CM): Assets are monitored to find anomalies, indicators of compromise, and other potentially adverse events
	Adverse Event Analysis (DE.AE): Anomalies, indicators of compromise, and other potentially adverse events are analysed to characterize the events and detect cybersecurity incidents
RESPOND (RS): Actions regarding a detected cybersecurity incident are taken	Incident Management (RS.MA): Responses to detected cybersecurity incidents are managed
	Incident Analysis (RS.AN): Investigations are conducted to ensure effective response and support forensics and recovery activities
	Incident Response Reporting and Communication (RS.CO): Response activities are coordinated with internal and external stakeholders as required by laws, regulations, or policies
	Incident Mitigation (RS.MI): Activities are performed to prevent expansion of an event and mitigate its effects
RECOVER (RC): Assets and operations affected by a cybersecurity incident are restored	Incident Recovery Plan Execution (RC.RP): Restoration activities are performed to ensure operational availability of systems and services affected by cybersecurity incidents
	Incident Recovery Communication (RC.CO): Restoration activities are coordinated with internal and external parties

9. PROCEDURE FOR REQUESTING ACCESS TO INFORMATION

9.1. How to Request a Record

9.1.1. A request for access to a record contemplated in section 18(1) or 53(1) of PAIA must be made on a form that corresponds substantially with Form 2 of Annexure A to the Regulations, to the Information Officer. The Information Officer must, if a request for access to a record is made orally because of illiteracy or the disability of a requester, complete Form 2 of Annexure A to the Regulations on behalf of the requester and provide a copy thereof to the requester. Failure to make use of the prescribed form could result in your Request being refused or delayed. A Request for access to a Record must be accompanied by payment of an initial non-refundable Request fee of R57.00 (inclusive of VAT). This fee is not applicable to personal Requests, i.e. individual seeking access to Records pertaining him/herself.

- 9.1.2. The Requestor must provide sufficient detail on the Request form to enable the Information Officer to clearly identify the Record as well as the Requestor's identity, which is to be accompanied by positive proof of identification.
- 9.1.3. The Requestor must indicate which form of access is required and if he/she wishes to be informed on the decision on the Request in any other manner, to state the necessary particulars to be so informed.
- 9.1.4. Access is not automatic. The Requestor must therefore identify the right he/she is seeking to exercise or protect and provide an explanation as to why the requested Record is required for the exercise or protection of that right.
- 9.1.5. If a Request is made on behalf of a person, the Requestor must then submit proof, to the satisfaction of the Information Officer, of his/her authority to make the Request. Failure to do so will result in the Request being rejected.

9.2. Decision on Request

- 9.2.1. The Requestor will be notified, within 30 days, in the manner indicated by him/her of the outcome of his/her Request, alternatively whether an extension not exceeding 30 days is required to deal with the Request.
- 9.2.2. If the Request for access is granted a further access fee must be paid for the reproduction as well as the search and preparation of the Records and for any time that has exceeded the prescribed hours to search and prepare the Record for disclosure. Access will be withheld until the Requestor has made payment of the applicable fee(s)
- 9.2.3. In the event that the Request for access is refused, reasons for the refusal will be provided and the Requestor will be advised the he/she may lodge an application with a court against the refusal of the Request, as well as the procedure for lodging the application
- 9.2.4. The Requestor may lodge an internal appeal or an application to court against the tender or payment of the Request fee.

10. REFUSAL OF ACCESS

In terms of chapter 4 of the Act (Grounds for Refusal of Access to Records), there is provision for mandatory protection of the following information, save in the special circumstances provided for in the Act:

- 10.1. Mandatory protection of privacy of third party who is natural person;
- 10.2. Mandatory protection of commercial information of third party;
- 10.3. Mandatory protection of certain confidential information of third party;
- 10.4. Mandatory protection of safety of individuals, and protection of property;
- 10.5. Mandatory protection of records privileged from production in legal proceedings;
- 10.6. Commercial information of private body;

- 10.7. Mandatory protection of research information of third party, and protection of research information of private body;

11. FEES PAYABLE IN TERMS OF SECTION 51 (1)(f)

11.1. Copy of Manual

The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1.10 for every photocopy of an A4-size page or part thereof.

11.2. Request Fee

11.2.1. A requestor is required to pay the prescribed fees (R50.00) before a request is processed.

11.2.2. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (not more than one third of the access fee which would be payable if the request were granted).

11.2.3. A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.

11.3. Reproduction Fees

The fees for preparation of Records referred to in regulation 11(1) are as follows:

	Rands
a) For every photocopy of an A4-size page or part thereof	R 1.10
b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 0.75
c) For a copy in a computer-readable form on -	
(i) Copy on a CD	R 70.00
(ii) Electronic media	R 7.50
d) For Transcription of visual images per A4 page	R 40.00
e) For Copy of a visual image	R 60.00
f) For Transcription of an audio recording per A4 page	R 20.00
g) For Copy of an audio recording	R 30.00

11.4. Access Fees

The access fees payable by a Requestor referred to in regulation 11(3) are as follows:

	Rands
a) For every photocopy of an A4-size page or part thereof	R 1.10
b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 0.75
c) For a copy in a computer-readable form on -	
(i) Copy on a CD	R 70.00
(ii) Electronic media	R 7.50
d) For Transcription of visual images per A4 page	R 40.00
e) For Copy of a visual image	R 60.00
f) For Transcription of an audio recording per A4 page	R 20.00
g) For Copy of an audio recording	R 30.00

- 11.5. The actual postage is payable when a copy of a Record must be posted to a Requestor.

12. AVAILABILITY OF THE MANUAL

- 12.1. A copy of the Manual is available-
- 12.1.1. on the EnviroServ Group website, www.enviroserv.co.za
 - 12.1.2. head office of the Company for public inspection during normal business hours;
 - 12.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 12.1.4. to the Information Regulator upon request.
- 12.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

13. UPDATING OF THE MANUAL

The head of the company will on a regular basis update this manual.

ISSUED BY

DocuSigned by:

Esme Gombault

785FAC1ABFE8410...

Esme Gombault
Information Officer