ACCESS TO INFORMATION AND DATA SUBJECT PARTICIPATION MANUAL FOR THE ICTS GROUP OF COMPANIES, COMPRISING:

INVESTMENT CONSULTING AND TRUSTEE SERVICES (PTY) LIMITED

Registration number: 1996/000948/07

Information Officer: David Weil (weild@ICTS.co.za)

Deputy Information Officers: Robynne Kriek (Death Benefit Investigation and

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Information Officer: Chris Brits (britsc@EBNet.co.za)

Pensions World SA

• MOTSWEDI EMERGING MANAGER STRATEGISTS (PTY) LIMITED

Registration number: 2011/006602/07

Information Officer: Mark Davids (<u>davidsm@motswedi.co.za</u>)

• ICTS TRACING SERVICES (PTY) LIMITED

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1 INTRODUCTION

This information manual is in respect of ICTS Group Companies, including all wholly or partially owned subsidiaries and associated entities, hereinafter referred to as "ICTS". Refer to Annexure 3 of this document for a complete list of subsidiaries.

This information manual ("Manual") provides an outline of the types of records held by ICTS and explains how one may submit requests for access to these records in terms of the Promotion of Access to Information Act, 2 of 2000 (the "Act").

The Act gives effect to everyone's constitutional right of access to information held by private sector bodies (e.g. companies) or public bodies (i.e. Government institutions) that is required for the exercise and/or protection of the requester's rights.

A guide to the Act is available from the South African Human Rights Commission ("SAHRC") website: www.sahrc.org.za. It describes, in each official language:

- The objectives of this Act;
- The details of each private body (where possible);
- The process that needs to be followed in order to make a request;
- How to get copies of the Guide at no charge;
- How to get access to the manual of a private body; and
- All the remedies available in law to you.

Should you have any queries in this regard, please contact the SAHRC directly at: The South African Human Rights Commission: PAIA Unit

The Research and Documentation Department

Postal address: Private Bag 2700

Houghton

2041

Tel: +27 11 887-3803

Fax: +27 11 403-0625

Website: www.sahrc.org.za

E-mail: paia@sahrc.org.za

2 AVAILABILITY OF THIS MANUAL

You, the requester, can access this Manual on our website (www.ICTS.co.za) or by requesting a copy by e-mail from the ICTS Information Officer as provided for in paragraph 4 below.

3 REQUESTS FOR INFORMATION

You may submit your request for information records to the ICTS Information Officer as provided for in paragraph 4 below. It is recommended that you read this manual first, in particular paragraphs 6 through 9, before submitting any requests.

4 ICTS INFORMATION OFFICER CONTACT DETAILS

ICTS Information Officer

P O Box 65939

Benmore

3

2010

Tel: +27 11 656 1160

E-mail:weild@icts.co.za

5 ICTS PRIVACY PRACTICES

- 5.1 We collect personal or other information to:
- Meet our responsibilities to customers, employees and other natural or juristic persons;
- Follow client instructions:
- Inform clients of new services: and
- Make sure our business suits clients' needs.
- 5.2 Personal information may be received from or provided to:
- any regulatory authority (like the FSCA) and the regulators they appoint for the various financial sectors
- comply with any regulation passed under the relevant legislation, or any legal process
- protect and defend ICTS's rights and property (including ICTS's intellectual property).
- protect public interest
- Brokers / advisers / intermediaries (with the necessary consent)
- Companies within the ICTS Group
- Retirement funds, medical schemes, fund members and beneficiaries, consultants and fund administrators
- Third party service providers in order to uphold contractual obligations or service customers.
- 5.3 Trans border information flows (cloud storage)

ICTS may share with or receive personal information from parties as set out above, where these parties are situated outside of the Republic of South Africa. All operations are required to abide by the legislative requirements for data protection in these countries. Such countries include:

Cloud suppliers +OneX

- 5.4 Employee personal information may be received from or provided to:
- Pension / provident funds and/or their trustees
- Medical aid funds
- Recruitment companies
- Credit bureaux
- SARS

SAPS

5.5 Our security practices

- We are committed and obliged to implement all reasonable controls to safeguard access to your personal information.
- Where third parties are required to process your personal information in relation to the purposes set out in this manual and for other legal requirements, we ensure that they are contractually bound to apply the appropriate security practices.
- All use of our website and transactions through it are protected by encryption (secret codes) in line with international standards.

6 TYPES OF RECORDS HELD BY ICTS

ICTS maintains records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

6.1 Company records

The following are records pertaining to ICTS's own affairs:

- Finance and accounting records
- Human Resources;
- Strategy;
- Shareholders;
- Intermediaries;
- Operational records;
- Technology;
- Compliance and Risk;
- Subsidiary;
- Contractors; and
- Directors

6.1.1 Types of personal information held by ICTS

Categories of data subjects	Categories of information held
Customers	Includes relevant personal information or special personal information
including	as defined by the Protection of Personal Information Act, No. 4 of
retirement funds,	2013, such as name, South African identity number or other identifying
insurers and share	number (e.g. passport), date of birth, citizenship, telephone number(s),

incentive schemes	email address(es), income tax numbers, physical and postal addresses,
and their members	financial information (e.g. fund or portfolio details), banking information
and beneficiaries,	(including account numbers), health information, children's information,
trustees and other	race.
fund officers,	For juristic persons: entity name, registration number, income tax
consultants,	number, tax information, contact details for representative persons.
advisors, fund	FICA documentation used to verify identity and details of customer.
administrators	
Directors	ID numbers, name, financial information as required for statutory reporting
Employees	Includes ID number, contact details, physical and postal address, date
	of birth, age, marital status, race, disability information, employment
	history, criminal / background checks, fingerprints, CVs, education
	history, banking details, income tax reference number, remuneration
	and benefit information (including medical aid, pension / provident fund
	information), details related to employee performance, disciplinary
	procedures.
	"Employee" refers to any person who works for or provides services to
	or on behalf of ICTS and receives or is entitled to receive any
	remuneration and any other person who assists in carrying out or
	conducting any work or services for ICTS. This includes, without
	limitation, heads of departments, managers, all permanent, temporary
	and part-time staff as well as contract workers.
Service Providers,	Includes company registration details, income tax and VAT registration
including	details, BEE certificates, payment details including bank accounts,
outsourced /	invoices, contractual agreements, addresses, contact details, any
hosted services,	records a third party has provided to ICTS; and Records generated by
auditors, legal	or within ICTS pertaining to work or services, including transactional
consultants, brand	records.
managers, HR	
consultants,	
insurers, banks	

6.2 Other Parties

Records are kept in respect of other parties, including without limitation contractors, suppliers, departments, service providers. Alternatively, such other parties may possess records which can be said to belong to ICTS. The following records fall under this category:

- Employee, work or service-related records which are held by another party as opposed to being held by ICTS; and
- Records held by ICTS pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.

6.3 Publicly available records

We set out the records which are already publicly available without a request for access in terms of the Act being necessary:

• Individual Group company annual Financial statements

6.4 Records available in accordance with other legislation

- Long Term Insurance Act 52 of 1998
- Pension Funds Act 24 of 1956
- Medical Schemes Act 131 of 1998
- Collective Investments Schemes Control act 45 of 2002
- Companies Act 61 of 1973
- Skills Development Levies Act 66 of 1995
- Financial Intelligence Centre Act 38 of 2001
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Prevention of Organised Crime 121 of 1998
- Income Tax Act 58 of 1962
- Financial Advisory and Intermediary Services Act 37 of 2002
- Value Added Tax 89 of 1991
- Unemployment Insurance Act 63 of 2001
- Compensation for Occupational Injuries and Diseases Act 130 of 1993

7 STEPS TO CONSIDER BEFORE SUBMITTING A REQUEST

The following steps must be considered before submitting a request:

7.1 Step 1: Are you requesting your own information?

All ICTS clients are allowed access to their own information without having to use the request for access to information procedures as set out in the Promotion of Access to Information Act, including, but not limited to:

- Policy documents
- Account information
- Personal Records
- Voice recordings

All ICTS clients should contact the relevant call centre or department to request access to their own information. Please note that there may be administration costs associated with retrieval of certain types of information records.

7.2 Step 2: Are you entitled to use the Act to request access?

Please take note of section 7(1) of the Act which states:

"This Act does not apply to a record of a public body or a private body if:

- (a) that record is requested for the purpose of criminal or civil proceedings;
- (b) so requested after the commencement of such criminal or civil proceedings, as the case may be; and
- (c) the production of or access to that record for the purpose referred to in paragraph (a) is provided for in any other law."

If section 7(1) applies, you may not bring a request in terms of this Act. You must use the rules and procedures for discovery of information of the relevant legal forum and proceedings you are involved in. ICTS reserves the right to claim all expenses and other damages incurred as a result of a requester submitting a request in contravention of section 7(1).

7.3 Step 3: Does the information requested exist in the form of a record?

Please note that the Act only applies to records that are in existence at the time of us receiving your request. The Act does not compel anyone to create a record which is not yet in existence at the time the request is made. For instance, the Act cannot be used to obtain reasons for a decision taken by ICTS if such reasons are not in the form of a record.

7.4 Step 4: Is the record in the possession or under the control of ICTS?

The Act provides that the record requested must be in our possession or under our control. Therefore, even if a record was created by ICTS or at some point in ICTS's possession (but no longer in ICTS's control at the time of your request), you must seek access to the record from the party under whose possession or control it is.

8 HOW TO SUBMIT A REQUEST FOR ACCESS

Please consider the steps in paragraph 7 above before submitting your request. Once you are satisfied that none of the aforegoing prohibitions apply to you, you may proceed to submit a request as follows:

8.1 Request form

Please complete the request form in Annexure 1 to this Manual (the "Request Form").

You can send the completed request form as is or under cover of a separate letterhead or fax cover.

In the Request Form, you need to provide sufficient information to enable us to adequately identify:

- The record or records requested;
- The identity of the requester,
- Which form of access is required, if the request is granted;
- The postal address, fax number or email address of the requester.

8.2 Description of the right

Take care to adequately describe the right which you are seeking to protect or enforce by means of the records requested. Please note that the courts have indicated that access to the records must be "necessary" for the exercise or protection of the right so stated.

It is important to note that ICTS may refuse you access to the records requested if the right is not clearly defined or where the right you claim to seek to exercise or protect does not qualify as a right as contemplated in the Act.

8.3 Representatives

If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of ICTS.

8.4 Illiteracy or disability

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

8.5 Prescribed fees

- (a) The prescribed fees, where applicable, as provided for in paragraph 9.2 below must be paid and proof of payment (e.g. copy of deposit slip) must be submitted following your request.
- (b) The requester will be notified where the Group Privacy Officer requires a deposit (calculated from the access fee).
- (c) You must submit proof of payment before your request can be processed.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

9 PRESCRIBED FEES

- 9.1 The Act provides for two types of fees, namely:
- A request fee, which will be a standard fee; and
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.
- 9.2 The requester, other than a personal requester*, must pay the prescribed R50.00 (fifty rand) request fee, following submission of the request and provide a deposit slip as proof of payment which must follow the Request Form.
 - * "personal requester" means a requester seeking access to a record containing personal information ** about the requester.
 - ** "personal information" means information about an identifiable individual, including, but not limited to—
 - (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the individual;
 - (b) information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
 - (c) any identifying number, symbol or other particular assigned to the individual;
 - (d) the address, fingerprints or blood type of the individual;

- (e) the personal opinions, views or preferences of the individual, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;
- (f) correspondence sent by the individual that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the individual;
- (h) the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual, but excluding the name of the other individual where it appears with the views or opinions of the other individual; and
- (i) the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual, but excludes information about an individual who has been dead for more than 20 years.
- 9.3 If the search for and preparation of the record (for disclosure), including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, ICTS will request you to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.
- 9.4 ICTS may withhold a record until the requester has paid the fees as indicated in Annexure 2.
- 9.5 A requester whose request has been granted must pay the applicable access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.
- 9.6 You may ask for a refund of the deposit if your request for access is refused.

10 CONSIDERING YOUR REQUEST

- 10.1 ICTS will have deemed to have received your request when all of the requirements in respect of the Act have been met.
- 10.2 Subject to the provisions in the Act in respect of extension of time periods, ICTS will process the request within 30 days, unless you have stated special reasons which would satisfy ICTS that circumstances dictate that the above time periods not be complied with.
- 10.3 You will be informed in writing whether access has been granted or denied.
- 10.4 The main grounds for ICTS to refuse a request for information relate to the:
 - 10.4.1 mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
 - 10.4.2 mandatory protection of the commercial information of a third party, if the record contains:
 - trade secrets of that third party;

- financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
- information disclosed in confidence by a third party to ICTS, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- 10.4.3 mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 10.4.4 mandatory protection of the safety of individuals and the protection of property;
- 10.4.5 mandatory protection of records which would be regarded as privileged in egal proceedings;
- 10.4.6 the commercial activities of ICTS, which may include:
 - trade secrets of ICTS;
 - financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of ICTS; and
 - information which, if disclosed could put ICTS at a disadvantage in negotiations or commercial competition;
 - a computer program which is owned by ICTS, and which is protected by copyright;
 and
- 10.4.7 the research information of ICTS or a third party, if its disclosure would disclose the identity of ICTS, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

11 YOUR REMEDIES

ICTS does not have internal appeal procedures. As such, the decision made by ICTS is final. If your request is denied, you are entitled to apply to a court with appropriate jurisdiction for relief.

ANNEXURE 1:

REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY

This annexure must accompany the cover letter addressed to the ICTS Information Officer

A. Particulars of	of ICTS (or Divisions of	ICTS)
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ICTS Information Officer

P O Box 65939

Benmore

2010

Tel: +27 11 656 1160

E-mail: weild@ICTS.co.za

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
E-mail address:	
Capacity in which the request is made, when made on behalf of another person:	

C. Particulars of person on whose behalf request is made

This section must be completed only if a request for information is made on behalf of another person.

Full names	and surname:
Identity nu	mber:
D.	Particulars of record
number if (b) If the p form.	e full particulars of the record to which access is requested, including the reference that is known to you, to enable the record to be located. provided space is inadequate, please continue on a separate folio and attach it to this ester must sign all the additional folios.
1 Descriptio	on of record or relevant part of the record:
2 Reference	e number, if available:
3 Any furth	er particulars of record:

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) There are two types of fees:
- Request fee: R50
- Access fee: 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. This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in Annexure 2.
- (c) The requester will be notified where the Group Privacy Officer requires a deposit (calculated from the access fee).

Where a deposit has been taken and the request has subsequently been refused, the Group Privacy Officer will refund the deposit to the requester.

- (d) Please ensure that you use the following reference for your deposit or we will not be able to identify it as belonging to you:
- "PAIA" followed by your initial(s) and surname (e.g. If your initials and surname is AN Smith, you must use PAIA AN Smith as your reference.
- You must submit proof of payment before your request can be processed.
- (e) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from paym	ent of fees:			
F F/				
F. Form of access to rec	cord			
If you are prevented by a disabil	ity to read, view o	or listen to the	record in the form	of access
provided for in 1 to 4 hereunder				
required.				
Disability:		Form	in which record i	s required:
Mark the appropriate box with	an X.			
NOTES:				
(a) Compliance with your reques	t in the specified	form may depe	end on the form ir	ı which the
record is available.	may be referred	in cortain sing	metanese læ svel-	2 6260 900 931
(b) Access in the form requested	•		nstances. In such	a case you will
be informed if access will be gra (c) The fee payable for access for			mined nartly by th	ne form in which
access is requested.	i tile record, ii ali	iy, wiii be deter	illilled partly by ti	ie ioiiii iii wilicii
1. If the record is in written or pr	rinted form:			
copy of record*		inspection of	record	
2. If record consists of visual ima	ges: this includes			dings.
computer-generated images, ske	-	, h		85)
view the images	copy of the ima	ges*	transcription o	f images*
3. If record consists of recorded		-	•	
listen to the soundtrack audio ca	issette	transcription	of soundtrack* wr	itten or printed
		document		
4. If record is held on computer	or in an electroni	c or machine-re	eadable form:	
printed copy of record*	printed copy of		copy in compu	
	derived from th			compact disc)
If you requested a copy or transc	•	•	Yes	No
you wish the copy or transcription	on to be posted to	o you? Postage		
is payable.				
G. Particulars of right to	be exercised or	protected		
-		•		
If the provided space is inadequa		nue on a separa	te folio and attach	it to this form.
The requester must sign all the a	idditional folios.			
1. Indicate which right is to	be exercised or p	rotected:		
· ·	·			

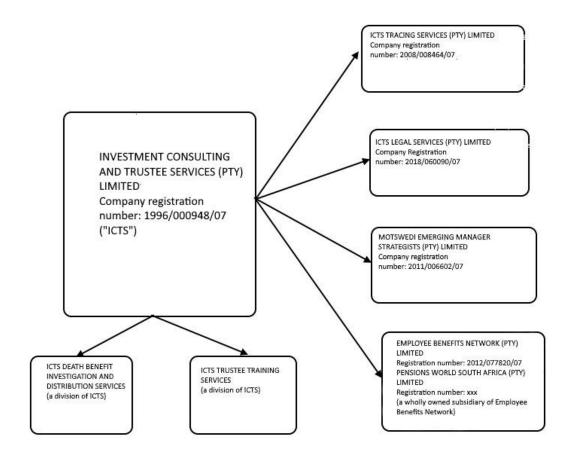
-	why the record requested is required for the exercise or protection of the aforementioned
rignt:	
	·
н.	Notice of decision regarding request for access
informed	be notified in writing whether your request has been approved/denied. If you wish to be d in another manner, please specify the manner and provide the necessary particulars to ompliance with your request.
How woul record?	d you prefer to be informed of the decision regarding your request for access to the
Signed at ₂	this day of 20
Signature	of requester / person on whose behalf request is made
FOR ICTS	INTERNAL USE ONLY
Referenc	e number:
ICTS Info	rmation Officer:
	fee (if any): R
	(if any): R
Access fe	ee: R
	JRE OF ICTS INFORMATION OFFICER authorised representative)

ANNEXURE 2: FEES IN RESPECT OF PRIVATE BODIES

DESCRIPTION		Rand
1	The fee for a copy of the manual as contemplated in regulation	
	9(2)(c) -	
	for every photocopy of an A4-size page or part thereof.	1,10
2	The fees for reproduction referred to in regulation 11 (1) are as	
	follows:	
(a)	For every photocopy of an A4-size page or part thereof	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	0,75
(c)	For a copy in a computer-readable form on—	
(i)	Stiffy disc	7,50
(ii)	Compact disc	70,00
(d)(i)	For a transcription of visual images, for an A4-size page or part	
	thereof	40,00
(d)(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
(e)(ii)	For a copy of an audio record	30,00
3	The request fee payable by a requester, other than a personal	
	requester, referred to in regulation 11(2)	50,00
4	The access fees payable by a requester referred to in regulation	
	11 (3) are as follows:	
4.1(a)	For every photocopy of an A4-size page or part thereof	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	0,75
(c)	For a copy in a computer-readable form on—	
(i)	Stiffy disc	7,50
(ii)	Compact disc	70,00
(d)(i)	For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part	20,00
(=)(.)	thereof	20,00
(ii)	For a copy of an audio record	30,00
(f)	To search for and prepare the record for disclosure - R30.00 for	
(.)	each hour or part of an hour, excluding the first hour, reasonably	
	required for such search and preparation.	
4.2	For purposes of section 54 (2) of the Act, the following applies:	
(a)	Six hours as the hours to be exceeded before a deposit is payable;	
. ,	and	
(b)	One third of the access fee is payable as a deposit by the	
. 7	requester.	
4.3	The actual postage is payable when a copy of a record must be	
	posted to a requester.	
	'	

ANNEXURE 3:

THE ICTS GROUP OF COMPANIES STRUCTURE:



1. INVESTMENT CONSULTING AND TRUSTEE SERVICES (PTY) LIMITED

The Company provides a wide range of services to clients, such as Investment Consulting, Independent Trustee Services and other services required primarily by retirement funds.

It also provides the core services for the entire ICTS Group of Companies, such as –

- Human Resources
- Information Technology
- Marketing
- Finance
- Communication Services Payroll
- Regulatory Compliance

2. ICTS DEATH BENEFIT INVESTIGATION AND DISTRIBUTION SERVICES

This is a division of ICTS that broadly provides the following services –

• determining the required information of the beneficiaries of retirement funds that fall within the definition of a dependant in relation to a death benefit;

- facilitating the tracing of the beneficiaries of deceased members of the fund; and
- recommending to the trustees the allocation of the death benefit to one or more of the beneficiaries, the estate of the deceased member or funds referred to in section 37C of the Pension Funds Act.

3. ICTS TRUSTEE TRAINING SERVICES

This is a division of ICTS that broadly provides the following services –

 educating trustees and members of retirement funds on the legal, technical and investment issues surrounding their specific funds by providing training on all aspects of the retirement fund industry

4. ICTS LEGAL SERVICES (PTY) LIMITED

The Company is part of the ICTS Group of Companies and is affiliated to ICTS. It provides the following services to trustees and other stakeholders in the retirement funds and medical schemes industry —

 Contracts, adjudicator responses, drafting of fund rules, publications, training seminars, advice on regulatory requirements, assistance with all fund-related queries, policy drafting, advice on new legislation.

5. MOTSWEDI EMERGING MANAGER STRATEGISTS (PTY) LIMITED

The Company is part of the ICTS Group of Companies and is affiliated to ICTS. It provides primarily the following services to medical schemes and retirement funds –

 Investment consulting and asset management services in order to enable its clients to comply with the Pension Funds Act, Medical Schemes Act, the Broad-Based Black Economic Empowerment Act, and industry regulators.

6. EMPLOYEE BENEFITS NETWORK (PTY) LIMITED AND PENSIONS WORLD SA

The Company is part of the ICTS Group of Companies and is affiliated to ICTS. It provides an employee benefits knowledge portal to retirement fund principal officers and trustees, umbrella fund trustees and management committees, company benefit managers, remuneration and rewards managers and HR managers, retirement fund members, benefit consultants, investment consultants, administrators, asset managers, independent financial advisers (IFA's) and other industry professionals.

7. ICTS TRACING SERVICES (PTY) LIMITED

The Company is part of the ICTS Group of Companies and is affiliated to ICTS. It provides primarily the following services to retirement funds, insurers and share incentive schemes ("Funds") and their members and/or beneficiaries –

- · Tracing of fund members who are entitled to unclaimed benefits
- Tracing of dependants of deceased members who are entitled to a benefit.

ANNEXURE 4:

ICTS (PTY) LIMITED – BASIC INFORMATION

• Physical Address:

Block D,

Country Club Estate Office Park,

21 Woodlands Drive,

Woodmead,

Sandton,

2080

Postal Address:

P O Box 65939

Benmore

2010

Other contact details:

Tel: (011) 656 1160

Fax: (011) 656 1165

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Company Registration Number

Registration no: 1996/000948/07