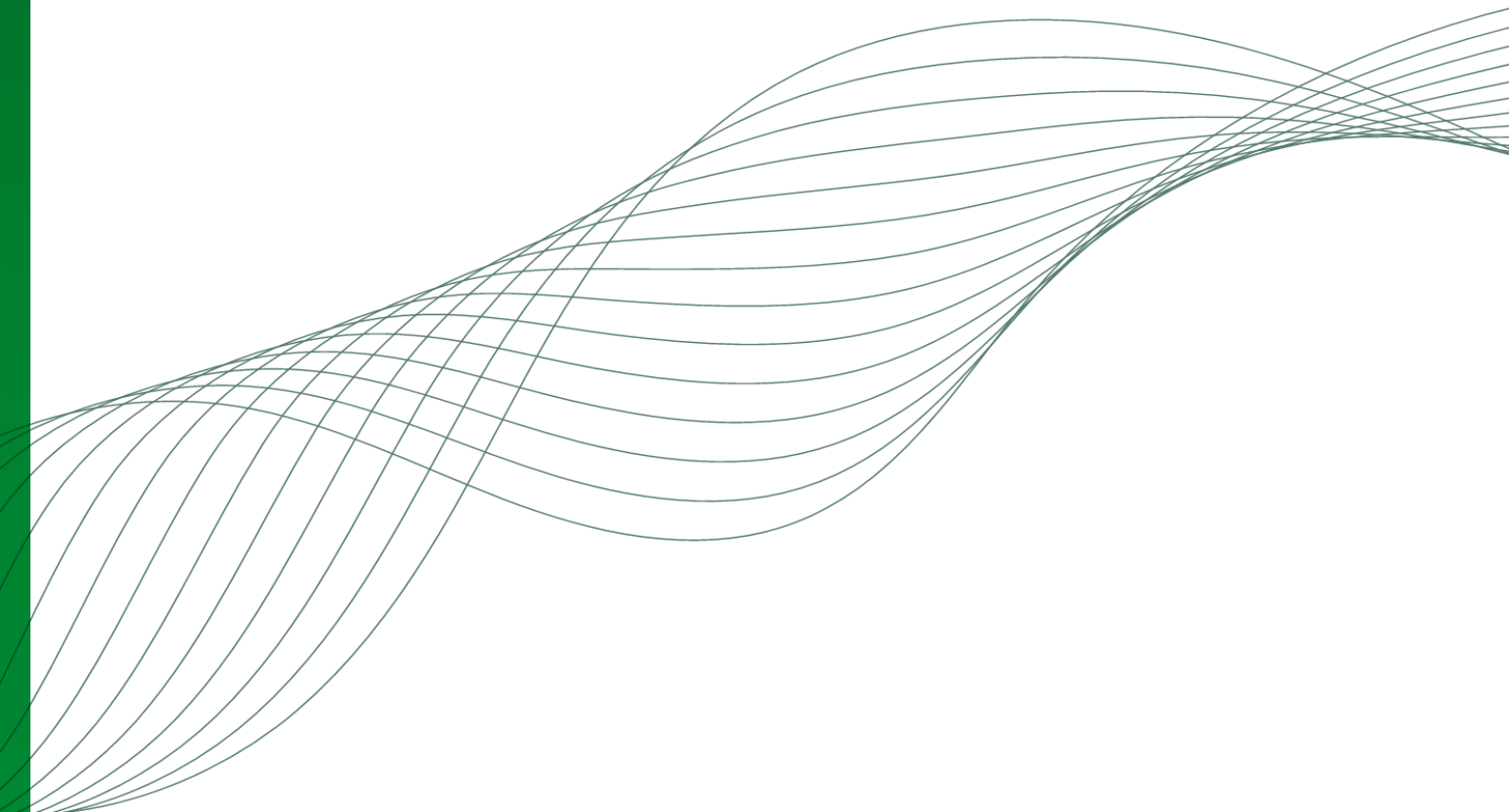


IHS TOWERS SOUTH AFRICA (PTY) LTD

Access to Information Manual (Private Body)

In accordance with Section 51 of The Promotion of Access to Information Act, 2 of 2000 as amended (PAIA)



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I. INTRODUCTION

IHS Towers South Africa Proprietary Limited, hereafter referred to as “IHS” is an independent owner, operator and developer of shared communications infrastructure in South Africa.

This manual was prepared in accordance with section 51 of PAIA, as amended by section 110 of the Protection of Personal Information Act No 4 of 2013 (**POPIA**).

II. PURPOSE

The purpose of this manual is to specify the following:

- Types and categories of records held by IHS.
- How to request access to information.
- Grounds for refusing access to information.
- Records available under legislations other than PAIA.
- Contact details for the Information Officer and Deputy Information Officer.
- Guide on using PAIA, as updated by the Regulator, and how to access it.
- Processing of personal information under POPIA.

III. KEY COMPANY CONTACT DETAILS

A. INFORMATION OFFICER

- **Name** : Unathi Jonas, Legal Director
- **Tel** : (011) 824-6971
- **Email** : unathi.jonas@ihstowers.com

B. DEPUTY INFORMATION OFFICER

- **Name** : Kabelo Moilola, Legal Advisor
- **Tel** : (011) 824-6971
- **Email** : kabelo.moilola@ihstowers.com

C. ACCESS TO INFORMATION GENERAL CONTACTS

- **Email**: infosouthafrica@ihstowers.com

D. HEAD OFFICE INFORMATION

- **Office Address:** 2nd Floor, 6 Parks Boulevard
Oxford Parks - 199 Oxford Road
Rosebank, 2196 - Johannesburg
- **Telephone number:** (011) 824-6971

- **Website:** <https://www.ihstowers.com/za-en>

IV. ADDITIONAL GUIDANCE

The Information Regulator has published a guide, as prescribed by Section 10 of PAIA which is designed to assist the public on how to request access to a record. The guide can be found at <https://inforegulator.org.za/paia/>

The contact details of the Information Regulator are as follows:

The Information Regulator (South Africa)

- **Address:** Woodmead North Office Park,
54 Maxwell Dr, Woodmead,
Johannesburg, 2191
- **Website:** <https://inforegulator.org.za/>
- **Email :** inforeg@justice.gov.za

V. CATEGORIES OF RECORDS HELD

A. RECORDS AVAILABLE WITHOUT AN ACCESS REQUEST

Information that is accessible without having to submit a request is available on the internet website <https://www.ihstowers.com/za-en>. This information includes:

- The IHS Code of Conduct and Business Principles.
- The IHS Whistleblowing and Non-Retaliation Policy.
- The IHS Supplier Code of Conduct.
- The IHS Health Safety and Security Policy.
- The IHS Environment Policy.
- The IHS Privacy Notice.
- The IHS South Africa PAIA Manual.
- Media Releases.
- Job Advertisements.

B. CATEGORIES OF RECORDS NOT READILY AVAILABLE

IHS maintains records on a diverse array of subjects and categories, as outlined in the table below. Access requests for these records are granted or denied following a

thorough evaluation based on PAIA guidelines. It is important to note that the following list is not exhaustive.

Subject	Categories
Company Secretary	Memorandum of incorporation
	Documents of incorporation
	Share register
	Board Charter
	Records relating to the appointment of directors / auditors / company secretary / public officer and other officers;
	Executive Committee Charter
	Minutes of meetings of the Board
	Minutes of meetings of the Executive Committee
	Operating license
	B-BBEE Certificate
	Other statutory records
Legal & Regulatory	Contracts
	Commercial disputes records
	Litigations records
	Permitting and licensing related records
Finance	Annual Financial Statements
	Accounting Records
	Tax Records
	Banking Records
	Inventory records
	Fixed Asset Register
	Debtors records
	Creditors records
	Financing records
	Budgets and projections
	Delivery notes, invoices, receipts and vouchers
	Purchase orders
	Billing records (Customer)
	Financial audit reports
	Insurance Records
	Finance policies and procedures
General correspondence	
Human Resources	Recruitment records
	Employees records
	Employment contracts
	Payroll records
	Records related to Employees' benefits
	Performance management records
	Training records
	Travels records
	Pension records
	Disciplinary records
	Accident books and records
	CCMA records
	Labor dispute records
Grievance procedure	

Subject	Categories
	HR policies and procedures Internal communication records B-BBEE records General correspondence
Commercial	Tower records Services portfolio Mobile Network Operators details Other customer details Customer agreements Customer orders Pricing models Billing records Commercial policies and procedures Corporate Social Responsibility (CSR) related records External communication records General correspondence
Procurement	Suppliers' details Tenders and requests for proposal related records Standard Terms and Conditions Supply agreements Purchase orders Procurement policies and procedures Supplier development records (B-BBEE) General correspondences
Operations	Lease agreements Tower portfolio details Technical performance reports Maintenance records Capital expenditures related records (Roll out plan) Site maintenance contractors' agreements Site build contractors' agreement Site access records Service level agreements (customers and suppliers) Network operating center related records Vehicle tracking system related records Vehicles maintenance records HSSE related records Operations policies and procedures Project management records IT Policies and procedures Inventory of IT related assets System documentation and manuals Access System Control records (Physical access) Bandwidth Usage statistics General correspondence
Internal Audit & Risk Management	Audit plan Internal audit reports Risk registers Business Continuity related records (BCP & DRP)
Administration & CEO office	Business and data information Management reports General correspondence

C. RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATIONS

IHS maintains certain records in accordance with legislations other than PAIA. The access to such records, specified within those legislations, may be restricted to certain individuals or circumstances. The applicable legislation includes, but are not limited to:

- Companies Act, 2008.
- Basic Conditions of Employment Act, 1997.
- Employment Equity Act, 1998.
- Labour Relations Act, 1995.
- Pension Funds Act 24 of 1956.
- Compensation for Occupational Injuries and Diseases Act, 1993.
- Occupation Health and Safety Act, 1993.
- Income Tax Act, 1962.
- Electronic Communications and Transactions Act, 2002.
- Unemployment Insurance Act, 2001.
- Unemployment Insurance Contributions Act, 2002.
- Skills Development Act, 1998.
- Skills Development Levies Act, 1999.
- National Environmental Management Act, 1998.
- Broad Based Black Economic Empowerment Act No. 53 of 2003 (“BBBEE”).
- Prevention and Combating of Corrupt Activities Act No. 12 of 2004.
- Criminal Procedure act No. 51 of 1977.

VI. PROCESSING OF PERSONAL INFORMATION

A. CATEGORIES OF DATA SUBJECTS

IHS processes personal information relating to the data subjects below:

- Employees.
- Suppliers & services providers.
- Customers.
- Directors and shareholders.
- B-BBEE beneficiaries.
- Landlords.
- General public – general enquiries, visit of company websites, accessing company premises with surveillance cameras.
- Requesters in terms of PAIA and POPIA.
- Industry bodies.

B. TYPES OF PERSONAL INFORMATION AS PER POPIA

As part of business activities, IHS collects personal information categorized into two groups as specified in the Protection of Personal Information Act (POPIA).

The first category known as “Personal Information” (PI) category involves details about both natural and juristic people. For natural persons, personal information includes data such as name, surname, ID number, birth date, passport number, contact details, marital status, nationality, language, opinions, pregnancy status, and bank account details.... For juristic entities, PI covers confidential information not typically made public.

The second category of personal information is “Special Personal Information” (SPI) which includes physical or mental health status, criminal status, religion, biometrics, disability, sexual orientation etc.

C. PURPOSE FOR PROCESSING OF PERSONAL INFORMATION

IHS will process personal information for purposes such as the sale of services, compliance with statutory obligations, security, administrative and legal purposes, and to fulfill contractual obligations with clients, suppliers and other third parties.

D. DESCRIPTION OF INFORMATION SECURITY MEASURES

IHS has implemented organizational and technical measures to safeguard personal information and other data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Additionally, reasonable steps are taken to ensure that personal information is accurate, current, complete, and reliable for its intended purpose.

E. PLANNED CROSSBORDER FLOWS OF INFORMATION

As part of its operations, IHS transfers personal information to various countries. These transfers occur only when the recipients require the information for a specific job, are bound by an agreement, and the transfers comply with POPIA and other applicable cross-border transfer regulations.

VII. REQUEST PROCEDURES

A. PROCEDURE FOR REQUESTING INFORMATION

A person who wants access to the records of IHS must complete the request form available on the Information Regulator’s [InfoRegSA-PAIA-Form02-Reg7.pdf](#). If a person needs assistance with obtaining the form, they should contact our Information Officer.

The completed request form must be sent to our Information Officer's email address or physical address.

The requester must provide the following:

- Their identity and the proof of such identity.
- Their email address, postal address, or fax number.
- The records requested and the type of access expected to be obtained.
- The rights they seek to protect or exercise and the reasons why the requested records support the exercise or the protection of such rights.
- The preferred channel to receive IHS's response to their request.
- The proof of the capacity through which they submit the request for themselves or for someone else.

An access request may be made orally due to illiteracy or the disability of the requester. In such a case, the Information Officer will assist the requester to complete the form and provide him/her with a copy of the completed form.

IHS will issue a written notice requiring the relevant request fee (details appear at Annexure B to the PAIA Regulations, available here:

<https://info regulator.org.za/wp-content/uploads/2020/07/20210827-gg45057gon757-PAIAre gulations.pdf>

Proof of payment must be provided before processing begins. If the search is likely to exceed six hours, IHS will request a deposit equal to one-third of the estimated access fee.

The Information Officer will provide written notification to the requester regarding the approval or denial of their request within 30 calendar days following receipt of proof of payment. If the requested record cannot be located or does not exist, a formal notification outlining the impossibility of granting access to that specific record will be issued via an affidavit.

If you are dissatisfied with the outcome or the fee, you may lodge Form 05 [InfoRegSA-PAIA-Form05-Reg10-1.pdf](#) with the Information Regulator or apply to court under section 78 PAIA

B. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

An access request to certain records may be refused under PAIA to protect:

- The privacy of a third party who is a natural person.
- The commercial information of a third party.
- Certain confidential information of a third party.
- The safety of individuals and protection of property.
- The records privileged from production in legal proceedings.
- The Commercial information of the private body.
- The research information of a third party and of a private body.

If only part of a record is protected, IHS will redact that portion and grant access to the remainder.

If the request for access is denied, IHS will inform the Requester of the reasons for denial. The Requester may be advised to lodge an application in court or file a complaint with the Information Regulator regarding the refusal.

I. Availability of the Manual

The manual is available for inspection free of charge at IHS's offices and on the IHS website (<https://www.ihstowers.com/za-en>)

Physical address:

2nd Floor, 6 Parks Boulevard

Oxford Parks - 199 Oxford Road

Rosebank - 2196

This manual is available for inspection by the general public upon request during office hours and there is no charge for viewing the manual at our offices located at the above-mentioned address.

II. Updating of the Manual

The Information Officer will update this manual on a regular basis.