

Information Manual

Published in terms of Section 51 of the
Promotion of Access to Information Act, 2 of 2000



LIBERTY

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1 INTRODUCTION

This information manual is in respect of Liberty Holdings Limited including all wholly or partially owned subsidiaries and associated juristic persons, hereinafter referred to as “Liberty”. 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 Liberty 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 requestor’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 of official language:

- What the objective of this Act are;
- 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.liberty.co.za) and www.libertyholdings.co.za websites, or by requesting a copy by e-mail from the Group Privacy Office as provided for in paragraph 4 below.

3 **REQUESTS FOR INFORMATION**

You may submit your request for information records to the Group Privacy 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 **GROUP PRIVACY OFFICER CONTACT DETAILS**

Group Privacy Officer
P O Box 10499
Johannesburg
2000
Tel: +27 11 408 3810

E-mail: privacy@liberty.co.za

5 **LIBERTY PRIVACY PRACTICES**

5.1 **We collect personal or other information to:**

- Meet our responsibilities to customers, employees and other natural or juristic persons;
- Follow your instructions;
- Inform you of new services; and
- Make sure our business suits your needs.

5.2 **Personal information may be received from or provided to:**

- any regulatory authority (like the Financial Services Board) 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 Liberty's rights and property (including Liberty's intellectual property).
- protect public interest
- Brokers / advisers / intermediaries
- Group companies, including STANLIB Limited and/or Standard Bank Group
- Third party service providers in order to uphold contractual obligations or service customers.

5.3 Trans border information flows

Liberty may share with or receive personal information from parties as set out above, where these parties reside outside of the Republic of South Africa. All operations are required to abide by Liberty's policies, procedures and guidelines, regardless of legislative requirements for data protection in these countries. Such countries include:

- Lesotho
- Swaziland
- Namibia
- Botswana
- Tanzania
- Kenya
- Uganda
- South Sudan
- Ghana
- Nigeria
- Zambia

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

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 LIBERTY

Liberty 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 Liberty'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 Liberty**

Categories of data subjects	Categories of information held
<p>Customers including policy holders / investors / beneficiaries / trustees / life assured / claimants / guardians</p>	<p>Includes relevant personal information or special personal information as defined by the Protection of Personal Information Act, No. 04 of 2013, such as name, South African identity number or other identifying number (e.g. passport), date of birth, citizenship, telephone number(s), email address(es), income tax numbers, physical and postal addresses, financial information (e.g. fund or portfolio details), banking information (including account numbers), health information.</p> <p>For juristic persons: entity name, registration number, income tax number, tax information, contact details for representative persons.</p> <p>FICA documentation used to verify identity and details of customer.</p>
<p>Advisers / brokers / Liberty entrepreneurs executors / agents of executors /</p>	<p>Includes licence numbers, physical addresses, contact details, compliance officer details.</p>
<p>Directors</p>	<p>ID numbers, name, financial information as required for statutory reporting</p>
<p>Employees</p>	<p>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.</p> <p><i>“Employee” refers to any person who works for or provides services to or on behalf of Liberty 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 Liberty. This includes, without limitation, heads of departments, managers, all permanent, temporary and part-time staff as well as contract workers.</i></p>

Categories of data subjects	Categories of information held
Consultants / contractors	Dependent on the nature of the consultant or contractor, but may include any details under “Employees” or “Service Providers” categories.
Service Providers, including outsourced / hosted services, auditors	Includes company registration details, income tax and VAT registration details, BEE certificates, payment details including bank accounts, invoices, contractual agreements, addresses, contact details, any records a third party has provided to Liberty; and Records generated by or within Liberty pertaining to work or services, including transactional records.

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 Liberty. 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 Liberty; and
- Records held by Liberty 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:

- Group annual Financial statements; and
- Group interim audited report.

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 Liberty 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 Liberty 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. Liberty 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 Liberty 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 Liberty?**

The Act provides that the record requested must be in our possession or under our control. Therefore, even if a record was created by Liberty or at some point in Liberty’s possession (but no longer in Liberty’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 REQUEST FOR ACCESS

Please consider the steps in paragraph 7 above before submitting your request. Once you are satisfied that none of the foregoing 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 Liberty 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 Liberty.

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

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 along with your request. Details of the bank account into which all required fees should be paid follow below:

Bank: Standard Bank of South Africa Limited

Account number: 200377035

Branch name: Braamfontein

Branch number: 004805

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.

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, before submitting the request and provide a deposit slip as proof of payment which must accompany 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, Liberty 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 Liberty 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 Liberty 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, Liberty will process the request within 30 days, unless you have stated special reasons which would satisfy Liberty 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 Liberty 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 Liberty, 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 legal proceedings;
- 10.4.6 the commercial activities of Liberty, which may include:

- trade secrets of Liberty;
- financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Liberty; and
- information which, if disclosed could put Liberty at a disadvantage in negotiations or commercial competition;
- a computer program which is owned by Liberty, and which is protected by copyright; and

10.4.7 the research information of Liberty or a third party, if its disclosure would disclose the identity of Liberty, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

11 **YOUR REMEDIES**

Liberty does not have internal appeal procedures. As such, the decision made by the Liberty 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 Group Privacy Officer

A. Particulars of Liberty (or Division of Liberty)

Group Privacy Officer
P O Box 10499
Johannesburg
2000
Tel: +27 11 408 3810
E-mail: privacy@liberty.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 number: _____

D. Particulars of record

(a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form.
The requester must sign all the additional folios.

1 Description of record or relevant part of the record:

2 Reference number, if available:

3 Any further 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 requestor 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 requestor.
- (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 payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.					
Disability: Form in which record is required:		Form in which record is required			
Mark the appropriate box with an X. NOTES: (a) Compliance with your request in the specified form may depend on the form in which the record is available. (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. (c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.					
1. If the record is in written or printed form:					
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record		
2. If record consists of visual images: this includes photographs, slides, video recordings, computer-generated images, sketches, etc)					
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images"		
<input type="checkbox"/>		<input type="checkbox"/>	transcription of images*		
3. If record consists of recorded words or information which can be reproduced in sound:					
<input type="checkbox"/>	listen to the soundtrack audio cassette	<input type="checkbox"/>	transcription of soundtrack* written or printed document		
4. If record is held on computer or in an electronic or machine-readable form:					
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record		
<input type="checkbox"/>		<input type="checkbox"/>	copy in computer readable form* (stiffy or compact disc)		
If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">Yes</td> <td style="width: 50%; text-align: center;">No</td> </tr> </table>	Yes	No
Yes	No				

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

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

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this ____ day of _____ 20__

Signature of requester / person on whose behalf request is made

FOR LIBERTY INTERNAL USE ONLY

Reference number:

Group Privacy Officer:

Request fee (if any): R

Deposit (if any): R

Access fee: R

SIGNATURE OF GROUP PRIVACY OFFICER (or duly 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 thereof	20,00
(e)(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 requester.	
4.3	The actual postage is payable when a copy of a record must be posted to a requester.	

ANNEXURE 3:**WHOLLY AND PARTIALLY OWNED SUBSIDIARIES OF LIBERTY****Wholly Owned Subsidiaries**

Liberty Group Limited	Liberty Properties (Swaziland) (Pty) Limited
Capital Alliance Investment Holdings (Proprietary) Limited	Liberty Properties Zambia Limited
Capital Alliance Life Limited	Liberty Viewpoint (Pty) Limited
Credit Partners GP (Pty) Limited	Lodestone Holdings (Pty) Limited
Credit Partners (B) GP (Pty) Limited	LPH Properties Limited
Dotcoza (Pty) Limited	Mezzanine Partners GP (Pty) Limited
Frank Financial Services (Pty) Limited	Mezzanine Partners (B) GP (Pty) Limited
Frank Life Limited	Neil Harvey & Associates (Pty) Limited
Friedshelf 940 (Pty) Limited	Own your life Rewards (Pty) Limited
Guardrisk Cell Captive (Mauritius)	Sandton Hotels (Pty) Limited
Lexshell 615 Investments (Pty) Limited	STANLIB Asset Management Limited
Liberty Active Limited	STANLIB Collective Investments Limited
Liberty Blue Consultancy Limited	STANLIB Credit Partners (Pty) Limited
Liberty Group Properties (Pty) Limited	STANLIB Fund Managers Jersey Limited
Liberty Group Property Development (Proprietary) Limited	STANLIB Ghana Limited
Liberty Group Property Management (Proprietary) Limited	STANLIB Infrastructure GP 1 (Pty) Limited
Liberty Growth Limited	STANLIB Kenya Limited
Liberty Health Holdings (Pty) Limited	STANLIB Limited
Liberty Holdco Nigeria Limited	STANLIB Multi-Manager Limited
Liberty Holdings Swaziland (Pty) Limited	STANLIB Swaziland (Pty) Limited
Liberty Holdings Zambia Limited	STANLIB Tanzania Limited
Liberty Life Insurance (Zambia) Limited	STANLIB Uganda Limited
Liberty Life Lesotho	STANLIB Wealth Management Limited
Liberty Life Swaziland Limited	STANLIB Wealth Management Nominees (Pty) Limited
Liberty Linked Investment Platform (Pty) Limited	Stonehouse Capital (Pty) Limited
Liberty Linked Investment Platform Nominee (RF) (Pty) Limited	Stonehouse Capital Servco (Pty) Limited
Liberty Nominees (Pty) Limited	Total Health Trust Limited
Liberty Private Fund Administrators Limited	Unique Payment Services (Pty) Limited
Liberty Propco (Pty) Limited	VMedical Solutions (Proprietary) Limited
	VMed Administrators (Proprietary) Limited

Partially Owned Subsidiaries

Africa and International Recovery Services (Proprietary) Limited
Azali Limited
Bay Wealth Management (Pty) Limited
Brenthurst Wealth Management (Pty) Limited
CfC Investments Limited
Charter Insurance Company Limited
East African Underwriters Limited
Eq-Fin (Pty) Limited
Exeo Capital (Pty) Limited
Finmap Financial Services (Pty) Limited
Hein Kruger Internasionale Fondsbestuur (Pty) Limited
Hereford Financial Services (Pty) Limited
JHI Retail (Pty) Limited
Liberty General Insurance (Pty) Limited
Liberty Holdings Botswana (Pty) Limited
Liberty Holdings Namibia (Pty) Limited
Liberty Kenya Holdings Limited
Liberty Life Assurance Uganda Limited
Liberty Life Botswana (Pty) Limited
Liberty Life Insurance Kenya Limited
Liberty Life Namibia Limited
Main Street 645 (Pty) Limited
Noble Private Portfolio (Pty) Limited
STANLIB Lesotho (Pty) Limited
STANLIB Namibia (Pty) Limited
STANLIB Namibia Unit Trust Management Company Limited
The Cullinan Hotel (Pty) Limited
The Financial Services Exchange (Pty) Limited
The Heritage Insurance Company Tanzania Limited
United Funeral Insurance Limited

V-innovation Administration Services (Pty) Limited

Zakly Investments One (Pty) Limited

Associated Juristic Persons

Amalgam Defined Benefit Pension Fund (36817)

Amalgam Defined Benefit Provident Fund (36818)

Amalgam Defined Contribution Pension Fund (The) (35871)

Amalgam Defined Contribution Provident Fund (34152)

Amalgam Investment Choice Pension Fund (36241)

Amalgam Investment Choice Provident Fund (36224)

Corporate Selection Pension Fund (36006)

Corporate Selection Pension Fund No 2 (36440)

Corporate Selection Retirement Fund (27024)

Corporate Selection Retirement Fund No 2 (36438)

Liberty Defined Contribution Pension Fund (36943)

Liberty Pension Fund (16176)

Liberty Provident Fund (15367)

Lifestyle Provident Fund (Umbrella) (25693)

Lifestyle Retirement Annuity Fund (6776)

Lifestyle Retirement Preserver Pension Plan (27974)

Lifestyle Retirement Preserver Provident Fund (27975)

LPFA Umbrella Pension Fund (37866)

LPFA Umbrella Provident Fund (37867)

ANNEXURE 4:

LIBERTY HOLDINGS LIMITED – BASIC INFORMATION

Physical Address

Liberty Group Limited
Liberty Centre
1 Ameshoff Street
Braamfontein
Johannesburg
2001

Postal Address

P O Box 10499
Johannesburg
2000

Other contact details

Tel: (011) 408 3911
Telegram “Liblife”
Fax: (011) 408 2326
Internet site: <http://www.liberty.co.za>
<http://www.libhold.co.za>

Company Registration Number

Registration no: 1957/002788/06