



**Information Manual prepared in terms
of section 51 of the Promotion of
Access to Information Act 2 of 2000 as
Amended (PAIA 31 of 2019)**

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1. Definitions, Acronyms and Abbreviations

CEO	Chief Executive Officer
DIO	Deputy Information Officer
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

2. Introduction

The Promotion of Access to Information Act, No 2 of 2000 as amended through the Promotion of Access to Information Amendment Act 31 of 2019 (“the Act”) gives effect to the constitutional right of access to any information in records held by public (government) or private (non-government) bodies that is required for the exercise of protection of any rights. Where a request is made in terms of the Act, MMH is obliged to release the information, except where the Act expressly provides that the information may or must not be released.

This manual informs requesters of procedural and other requirements which a request must meet as prescribed by the Act. This Manual has therefore been prepared in terms of section 51 of the Act.

Section 14 of the Constitution of the Republic of South Africa, 1996, provides the right to privacy. POPIA gives affect to the constitutional right to privacy provided in section 14 of the Constitution;

- (i) By safeguarding a person's personal information when processed by public and private bodies;
- (ii) In a manner which balances the right to privacy with any other rights, including the rights in the Bill of Rights in Chapter 2 of the Constitution, particularly the right to access to information; and
- (iii) Subject to justifiable limitations, including but not limited to effective, efficient and good governance and the free flow of personal information, particularly trans-border transfers.

Section 9 of PAIA recognises that the right of access to information is subject to certain justifiable limitations aimed at, amongst others:

- a) the reasonable protection of privacy;
- b) commercial confidentiality; and
- c) effective, efficient and good governance.

The Protection of Personal Information Act 4 of 2013

Section 55(2) of POPIA requires MMH and its subsidiaries to register its Information Officer and Deputy Information Officers with the Regulator before taking up their respective duties in terms of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) and the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

Regulation 4 (1) (c) of the POPIA Regulations confirms the publication requirement of PAIA when it stipulates that "...a manual is developed, monitored, maintained and made available as prescribed in sections 14 and 15 of PAIA." The requirement for a manual is then extended to include POPIA requirements when section 17 of POPIA provides that a "...responsible party must maintain the documentation of all processing operations under its responsibility as referred to in section 14 or 51 of the Promotion of Access to Information Act".

The purpose of this manual is to provide assurance to the regulator and the public on the processes at MMH to avail information to requesters and that MMH complies with the requirements of both PAIA and POPIA.

It is important to note that the Act recognises certain limitations to the right of access to information, including, but not limited to, limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution of the Republic of South Africa.

This manual is available for inspection, free of charge, at the physical address of MM Holdings Limited (MMH). The manual is reviewed annually.

1. Applicability to Momentum Metropolitan Holdings Limited

MMH falls within the definition of a **private body**; therefore, the sections pertaining to private bodies will be applicable.

This manual applies to MMH and all its South African based companies, companies that are its subsidiaries and that are legal entities.

For ease of reference a non-exhaustive list of entity names/trading names are provided in paragraph 13 of this manual. Access to the records of any subsidiary company of MM Holdings Limited not listed in this manual may be requested from the Information Officer: MMH.

2. Contact details

Postal Address:

PO Box 7400

Centurion

0046

Physical Address:

Momentum Building

268 West Avenue

Centurion

0157

Responsible Officer: DOUW LOTTER by delegation

E-mail Address: DLotter@mmltd.co.za

Telephone Number: +27 (0)12 671 8911

Website: <https://www.momentummetropolitan.co.za/en>

Information Officer: JEANINE NORDEN

E-mail Address: Jeanine.norden@mmltd.co.za

Telephone Number: +27 (0)12 671 8911

3. The Information Regulator of South Africa

The Information Regulator is required in terms of the Act to compile a guide in every official language, in an easily comprehensible form and manner, as may be required by a person who wishes to exercise any right contemplated in the Act.

Any enquiries regarding this guide should be directed to:

Postal Address:

The Information Regulator (South Africa)

PO Box 31533

Braamfontein

2017

Telephone Number: +27(0) 10 023 5200

Email Address: infoereg@justice.gov.za

4. Subjects and categories on which records are held

Products and Services
<p>Long-term insurance products</p> <p>Savings products</p> <p>Unit Trust products</p> <p>Investment and risk products to groups and schemes</p> <p>Short-term insurance products</p> <p>Linked Investment services</p> <p>Administration of Retirement Annuities and Pension Funds</p> <p>Actuarial and consulting services to the retirement industry</p> <p>Trust Services</p> <p>Managed care services to the healthcare industry</p> <p>Health Care products</p> <p>Administration of medical schemes</p>
Company Records
<p>Finance and supporting documentation</p> <p>Actuarial</p> <p>Client Care</p> <p>Product Management</p> <p>All records kept in terms of law related to managing legal entities of MMH</p> <p>Distribution</p> <p>Marketing</p> <p>Information Technology</p> <p>Human Resources</p>
Subjects on which records are held
<p>Shareholders</p> <p>Board Members</p> <p>Directors</p> <p>Employees*</p> <p>Officials</p> <p>Consultants</p> <p>Investors</p> <p>Service providers</p> <p>Subsidiary companies</p> <p>Advisors</p> <p>Independent brokers</p> <p>Clients</p> <p>Banking Institutions</p> <p>External companies/contractors</p> <p>Policyholders</p>
The following records are held in respect of the abovementioned subjects
<p>Confidential</p> <p>Personal</p> <p>Commercial</p>

Financial
Group/company incorporation
Group/company financial
Group/company departments
Strategy
Contractors
Investors
Subsidiary companies
Advisers
Consultants
Information Technology
Clients**
Products and services
Contracts
Rules of Funds
Scientific
Research
Operational
Trade
Business
Internal group/company divisions
Group/company structure
Policyholders
Shareholders
External companies
Brokers
Directors
Employees
Banking Institutions
Official/Legal
Policy documents

5.1 The accessibility of the documents listed below may be subject to the grounds of refusal set out in this manual.

Employee Records:

"Employee" refers to any person who works for or provides services to or on behalf of MMH and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of MMH and includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers. Employee Records may include the following:

- Personal records provided by employees;
- Records provided by a third party relating to employees;
- Conditions of employment and other employee related contractual and quasi-legal records;
- Correspondence relating to employees; and
- Training schedule/s and material.

Client Related Records

A "client" refers to any natural or juristic entity that receives services from MMH. Client Records may include the following:

- Records provided by a client to an intermediary;
- Records provided by a third party;
- Records generated by or within MMH, relating to clients, including transactional records.

MMH Company Records

These records include but are not limited to the records that MMH holds of their own affairs. Company records may include the following:

- Financial records
- Internal correspondence
- Information technology
- Operational records
- Product records
- Statutory records
- Communications
- Internal Policies and Procedures
- Human Resources records
- Administration records, Service level agreements, contracts and other agreements

Client Care Records

- Policy/contract documents
- Applications
- Amendments
- Financial transactions
- Alterations

- General information

Alternate Records

- Company secretarial records
- Databases
- Marketing records
- Treasury-related records
- Securities and equities
- Records held by an official of MMH

These records include but are not limited to the records which pertain to MMH’s own affairs.

Other Records

Further records are held pertaining to:

- Shareholders
- Directors
- Employees
- Officials
- Intermediaries
- Service Providers

5. Categories of Data Subjects

Category of data subject	Categories of information and records*
Employees of MMH	Name, ID number, physical address, health information, disability information, employee benefit information, bank details, tax number, letter of appointment, vehicle registration information, performance records, payslips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage, next of kin information, beneficiary information, sexual health, sexual orientation, trade union membership, religious or philosophical beliefs, biometric information (photos)
Clients of MMH	Name, ID or registration number, address, financial information, credit check results, health information, application form, policy documents, VAT number, tax number, tax certificates, CCTV footage, biometric information (photos), call recordings, vehicle, and driver registration information, payment

	records, geo-location, policy information, contact person information if the client is a juristic person.
Business partners that MMH partner with for delivering certain products	Name, registration number, contact details, cashbacks, CCTV footage
Third parties with whom MMH conduct business services with	Name, registration number, financial information, contract details, CCTV footage
Contractors at MMH	Name, surname, physical address, registration number, financial information, contract, contractor name, ID number of contractors, CCTV footage, vehicle and driver registration information, biometric information (photos)
Suppliers and Vendors of MMH	Name, registration number, financial information, contract, tender documents, CCTV footage

6. Records available in accordance with other legislation

A requester may also request information that is available in terms of other legislation.

Administration of Estates Act 66 of 1965
Arbitration Act 42 of 1965
Basic Conditions of Employment Act 75 of 1997
Collective Investment Schemes Act 45 of 2002
Companies Act 61 of 1973
Companies Act 71 of 2008
Compensation of Occupational Injuries and Diseases Act 130 of 1993
Competition Act 89 of 1998
Consumer Affairs (Unfair Business Practices Act) 71 of 2008)
Consumer Protection Act 68 of 2008
Copyright Act 98 of 1978
Cybercrimes Act 19 of 2020
Electronic Communications and Transactions Act 25 of 2002
Employment Equity Act 55 of 1998
Financial Institutions Protection of Funds Act 28 of 2001
Financial Intelligence Centre Act 38 of 2001
Financial Markets Act 19 of 2012
Financial Sector Regulation Act 9 of 2017
Income Tax Act 58 of 1862
Insolvency Act 24 of 1936
Inspection of Financial Institutions Act 80 of 1998
Insurance Act 18 of 2017
Labour Relations Act 66 of 1995
Long-Term Insurance Act 52 of 1998
Medical Schemes Act 131 of 1998 (Where applicable as Administrator of a medical scheme)
National Credit Act 34 of 2005
National Credit Act 35 of 2002
National Payment Systems Act 78 of 1998
Occupational Health and Safety Act 85 of 1993
Participation Bonds Act 55 of 1981
Pension Funds Act 24 of 1956 Policyholder Protection Rules Pension Fund Regulations

Prevention and Combating of Corrupt Activities Act 12 of 2004
Prevention and Combating of Corrupt Activities Act 12 of 2014
Prevention of Organised Crime Act 121 of 1998
Protection of Constitutional Democracy Against Terrorist and Related Activities Act 36 of 2004
Protection of Personal Information Act 4 of 2013
Regulation of Interception of Communications and Provision of Communications-related Information Act 70 of 2002
Short-term Insurance Act 53 of 1998
Short-term Insurance Act 54 of 1998
Skills Development Levies Act 9 of 1999
South African Reserve Bank Act 90 of 1989
Trade Marks Act 194 of 1993
Trust Property Control Act 57 of 1998
Unemployment Insurance Act 63 of 2001
Usury Act 73 of 1965
Value Added Tax Act 89 of 1991

7. Access to records held by MMH

Records held by MMH will be accessed only once the prerequisite requirements for access have been met by a requester. A requester is any person making a request for access to a record of or held by MMH. There are two types of requesters:

7.1. Personal requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester.

MMH will voluntarily provide the requested information or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested maybe charged.

7.2. Other requester

This requester (other than a personal requester) is entitled to request access to information on third parties. However, MMH is not obliged to voluntarily grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee.

8. Purposes why MMH processes Personal Information

Processing Details

In terms of POPIA, data may only be processed for a specific purpose. MMH has various products and services and the reason for processing data differs will depend and differ based on the nature of the data that is collected, the data subject and the specific product and or service applicable. The purpose is disclosed either explicitly or implicitly when the data is collected. The **MMH Privacy Policy** elaborates on how data is collected in MMH.

Client Data

Client data is collected at various collection points as part of engagements with clients and provides MMH the ability to provide products and services to our clients. By means of example, the data may be collected as part of an application process, during a claims process in assessing a client's financial needs, in administering a client's health plan, assessing a client's risk profile or investment needs or for research purposes. MMH may also acquire data about our clients from third parties and process the data provided from credit bureaus or other industry bodies, a client's employer, health care providers or other providers to*:

- conduct underwriting;
- perform a risk assessment on a client;
- consider claims;
- provide financial advice;
- process medical expenses/claim on behalf of a medical scheme;
- process a product/service application;
- conduct research.

*Note: the list above may not be an exhaustive list.

Employee Data

MMH processes employee data for business administration purposes, such as payroll purposes. Employee data is also processed to the extent required by legislation. For example, the disclosure of employee's financial information to the Commissioner for the South African Revenue Services (SARS) in terms of the Income Tax Act 58 of 1962 and employees' special personal information in terms of the Employment Equity Act 55 of 1998.

MMH Company Data

These records include, but are not limited to, the records that pertain to MMH's own affairs. These include the following:

- Financial records and reports
- Operational Records
- Communication
- Product and services records
- Administrative records (E.g., Legal Agreements, contracts, service-level agreements)
- Information Technology
- Statutory records and reports
- Internal policies, procedures, and standards
- Human Resources data and records
- Company Intellectual Property

Third Party and External Records

These records include data acquired either in the public domain or from third party providers directly and include but may not be an exhaustive list, to be able to process payments or perform functions on MMH's behalf, because of an outsourced service or as part that is provided by the third party.

In performing these tasks MMH may process, collect, store, collate or disclose personal or special personal information. This may include the following information:

- Employee, client (being juristic or non-juristic entities) or private body records that are held by external third parties, other than subsidiaries of the MMH group.
- Financial records, correspondence, contractual records, payment records, records provided by other parties or records that third parties provided to MMH or its subsidiaries that are held within the MMH group that may pertain to other parties.
- MMH may keep records pertaining to other parties, including contractors, suppliers subsidiaries, holdings, joint-venture entities, service providers or entities that MMH may have a shareholding in.

9. Recipients to whom personal information may be supplied to

A requester is any party who may request access to a record that is held by MMH. A requester is entitled to request access to their own information or information pertaining to third parties, where the requester has a legitimate interest to protect or is appropriately authorised. Subject to the nature of the information requested, MMH may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data (such as the National Credit Regulator in terms of the National Credit Act 34 of 2005) – please reference list above for more examples.
- Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data held by MMH in terms of the applicable rules (such as the Competition Commission of the Competition Act 89 of 1998)
- The South African Revenue Service, or another similar authority
- The Department of Labour, or other similar authority
- A contracted third party who requires the information to provide healthcare services to a member or their dependants on their health plan.
- Anyone making a successful application for access in terms of PAIA
- Auditing and accounting bodies (both internal and external)
- Research or academic institutions (where applicable)
- Information regarding a data subject's creditworthiness with any credit bureau or credit provider, industry association or other association where MMH operates in, provided it is in line with the provisions in POPIA, the relevant POPIA codes of conduct and the National Credit Act 34 of 2005.

10. Transborder flows of personal information

MMH may transfer personal information to third parties who are outside the borders of South Africa. When transferring the data to alternative jurisdiction's, it is done for certain products or services. Personal Information may also be stored (processed) in the cloud or on data servers that are located outside the borders of South Africa. MMH will only do so in line with the provisions set out in POPIA and after a full assessment has been performed on the provider and the country has been fully assessed, with sufficient security safeguards and measures in place.

11. Measures implemented to ensure the confidentiality, integrity, and availability of the information to be processed

Information Security

The confidentiality and protection of client's data is a high priority for MMH. Information Security deals with MMH's Information, IT and Cyber security capability and practices.

Information Security specifically deals with the upholding of:

- Confidentiality: Ensuring that the relevant information is accessible only by parties who are authorised to have access to the correct information at the right time.
- Integrity: Upholding the integrity of the information to ensure that accurate and complete data and processing of data to ensure a consistent and reliable outcome with no bias or discrimination.
- Availability: The availability of the relevant data for the right time period by only the right individuals(users) to the right data and associated assets when required.

Information security is implemented in MMH through robust, repeatable, and tested processes with will define responsibilities and controls in place. Policies, Standards controls, roles and responsibility, reporting structures and escalation structures have been put in place with reporting structures to ensure that the structure is consistently evaluated and reported on. Information Security are implemented by means of the following:

- A trusted intelligent and support network team that extends outside the organisation.
- A dedicated task team with pro-active monitoring
- Rules that are set for secure conduct and for earning trust.
- Adequate monitoring, detection (and reporting) capabilities are maintained.
- Reporting and escalation structures in place to executive committees.
- Processes that are repeatable and followed by all involved parties in all instances.
- Organisation wide training and awareness
- Organised responses to incidents through a dedicated team which are effective and follow-through into a debrief and learning.

12. Request procedure

12.1. A requester requiring access to information held by a MMH entity must complete the prescribed **Form 2** published on MMH's website; or an applicable website of any MMH entity.

12.2. Submit the completed form to the Information Officer at the postal or physical address, or electronic mail address recorded in paragraph 2 of this manual and pay a request fee and a deposit, where so advised.

- 12.3. The prescribed form must be completed with enough particularity to at least enable the Information Officer to identify:
- 12.3.1. The record or records requested;
 - 12.3.2. The identity number of the requester;
 - 12.3.3. The form of access required if the request is granted;
 - 12.3.4. The e-mail, postal address, or fax number of the requester.
- 12.4. 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 the Information Officer.
- 12.5. The requester must state that he/she requires the information to exercise or protect a right, and clearly state what the nature of the right to be exercised or protected is. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.
- 12.6. MMH will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate that the above time periods could not be complied with.
- 12.7. The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he must state the manner and the particulars so required.
- 12.8. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.
- 12.9. Where applicable, the requester must pay the prescribed fee if applicable before any further processing can take place.

13. Decision

- 13.1. MMH will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 13.2. The 30-day period within which MMH must decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if an answer to the request contains a substantial volume of information, or the request requires a search for information held at another office of MMH and the information cannot reasonably be obtained within the original 30 day period. The Information Officer will notify the requester in writing should an extension be sought.

14. Grounds for refusal of access to records

MMH may refuse a request for information based on the following:

- 14.1. Mandatory protection of the privacy of a third party who is a natural person, that would involve the unreasonable disclosure of personal information of that natural person;
- 14.2. Mandatory protection of the commercial information of a third party, if the record contains:
 - 14.2.1. Trade secrets of that third party;
 - 14.2.2. Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - 14.2.3. Information disclosed in confidence by a third party to MMH, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- 14.3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
- 14.4. Mandatory protection of the safety of individuals and the protection of property;
- 14.5. Mandatory protection of records which would be regarded as privileged in legal proceedings;
- 14.6. The commercial activities of MMH, which may include:
 - 14.6.1. Trade secrets of MMH;
 - 14.6.2. Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of MMH;
 - 14.6.3. Information which, if disclosed, could put MMH at a disadvantage in negotiations or commercial competition;
 - 14.6.4. A computer program which is owned by MMH and which is protected by copyright.
- 14.7. The research information of MMH or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage;
- 14.8. Requests for information that is clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

If the request is:

- **Granted:** Where applicable, the notification will state the applicable access fee required to be paid, together with the procedure to be followed should the requester wish to apply to court against such fee, and the form in which access will be given.
- **Declined:** The notification will include adequate reasons for the decision, together with the relevant provisions of the Act relied upon and provide the procedure to be followed should the requester wish to apply to court against the decision.

The Information Officer's failure to respond to the requester within the thirty-day period constitutes a deemed refusal of the request.

Section 59 provides that the Information Officer may sever a record and grant access only to that portion which the law does not prohibit access to.

15. Remedies available when MMH refuses a requestor

15.1. Internal Remedies

MMH does not have internal appeal procedures. Therefore, the decision made by the Information Officer is final. Requesters who are dissatisfied with a decision of the Information Officer will have to exercise external remedies at their disposal.

15.2. External Remedies

A requester or a third party, who is dissatisfied with an Information Officer's refusal to disclose information or the disclosed information may within 30 days of notification of the decision, apply to the Constitutional Court, the High Court or another court of similar status for relief.

16. Fees

16.1. The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee; and
- An access fee will be calculated considering reproduction costs, search and preparation time and cost, as well as postal costs.

16.2. When the request is received by the Information Officer, the officer will by notice require the requester, other than a personal requester, to pay the regulated prescribed request fee **(if any)** before further processing of the request.

16.3. The Information Officer can withhold a record until the requester has paid the fees as indicated.

16.4. A requester whose request for access to a record has been granted, must pay an access fee for reproduction, for search, preparation and for any time reasonably required more than the prescribed hours to search for and prepare the record(s) for disclosure including arrangements to make it available in the requested format.

NOTE: Not requesting a fee will be at the discretion of the Information officer.

A comprehensive list of all MMH affiliated companies is available from the MMH company secretariat. Kindly refer to the MM Holdings Website for the details of the company secretary. The annexure below, lists all active companies that are 100% owned by MMH.

17. Annexure

A comprehensive list of all MMH companies is available from the MMH company secretariat. Kindly refer to the MM Holdings Website for the details of the company secretary. The annexure below lists all active companies that are 100% owned.

129 Rivonia Road Proprietary Limited
Amandla Ilanga SPV (RF) Proprietary Limited
CDC Parallel Investments Proprietary Limited
Equilibrium Investment Management Proprietary Limited <i>(previously Momentum Investment Consulting Proprietary Limited)</i>
ERIS Investments Holdings Proprietary Limited
Eris Properties East Africa Proprietary Limited
ERIS Property Holdings Proprietary Limited
Guardrisk Allied Products & Services Proprietary Limited
Guardrisk Group Proprietary Limited
Guardrisk Insurance Company Limited
Guardrisk Life Limited
Guardrisk Microinsurance Limited <i>(previously Momentum Structured Insurance Limited)</i>
Guardrisk Premium Finance Proprietary Limited
Hammarsdale PFS Proprietary Limited
Kambanjani EPG Proprietary Limited
MET Collective Investments (RF) Proprietary Limited
Metropolitan Capital Proprietary Limited
Metropolitan Franchise Proprietary Limited <i>(previously Momentum Insurance Solutions Proprietary Limited (previously Alexander Forbes Direct Pty Ltd)</i>
Metropolitan International Holdings Proprietary Limited
Metropolitan International Support Proprietary Limited
MMI Short Term Insurance Administration Proprietary Ltd
Momentum Ability Limited
Momentum Alternative Insurance Limited
Momentum Alternative Investments Proprietary Limited
Momentum Asset Management Nominees Proprietary Limited
Momentum Asset Management Proprietary Limited
Momentum Collective Investments (RF) Proprietary Ltd
Momentum Connect Proprietary Limited

Momentum Consult Proprietary Limited
Momentum Consultants and Actuaries Proprietary Limited
Momentum Healthcare Distribution Proprietary Limited
Momentum Insure Company Limited (<i>previously Momentum Short term Insurance Company Limited</i>)
Momentum Investments Management Proprietary Limited
Momentum Metropolitan ESD Trust
Momentum Metropolitan Finance Company Proprietary Limited
Momentum Metropolitan Infrastructure & Operations Proprietary Limited
Momentum Metropolitan Isabelo (RF) Proprietary Limited
Momentum Metropolitan Lending Proprietary Limited
Momentum Metropolitan Life Limited
Momentum Metropolitan Strategic Investments Proprietary Limited
Momentum Metropolitan Umhlanga Proprietary Limited
Momentum Multiply Nominees Proprietary Limited
Momentum Multiply Proprietary Limited
Momentum Outcome-Based Solutions Proprietary Limited
Momentum Property Investments Proprietary Limited
Momentum Securities Nominees (RF) Proprietary Limited
Momentum Securities Proprietary Limited
Momentum Thebe Ya Bophelo Proprietary Limited
Momentum Trust Limited
Momentum Wealth Nominees Proprietary Limited
Momentum Wealth Proprietary Limited
New Smal Construction co Proprietary Limited
Umgeni Development 3 Proprietary Limited
Umgeni Development No 4 Proprietary Limited
Von Brandis Square Development Co Proprietary Limited
Vulindlela Centre Proprietary Limited
Workers Health Investments Proprietary Limited
Zuri Property Solutions Proprietary Limited