



PROMOTION OF ACCESS TO INFORMATION ACT MANUAL



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

Issue: 3

Date: 24/07/2026

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Contents

1	Introduction	3
2	Abbreviations	3
3	Company overview	4
4	Privacy Governance.....	4
5	Scope of the Manual	4
6	Availability of the Manual	5
7	Information Officers and Deputy Information Officers.....	5
8	Guide for requesters on how to use PAIA.....	5
9	The Information Regulator (South Africa)	6
10	Automatic availability of certain records.....	7
11	Records Available in Accordance with other legislation.....	9
12	Processing of Personal Information	11
12.1	Purposes for Processing	11
12.2	Categories Of Data Subjects and information relating thereto.....	12
12.3	Categories of information	13
12.4	Categories of Recipients to whom the Personal Information may be supplied.....	13
12.5	Planned Transborder Flows of Personal Information.....	14
12.6	Information Security Measures	14
12.7	Retention of Personal Information	14
12.8	Data Subjects' Rights.....	14
12.9	Data Breach	15
13	Access Request Procedure	15
13.1	Completion of Access Request Form	15
13.1.1	Submission of Access Request Form	16
13.1.2	Payment of Fees	16
13.1.3	Notification	16
13.1.4	Third Party Information.....	17
13.1.5	Grounds for Refusal	17
13.1.6	Records that cannot be found or do not exist	18
13.1.7	Remedies for Refusal to Request Information	18
13.1.8	Other Information as May be Prescribed	19
14	History of Changes	19
	Annexure A: Related Entities, Information Officers, Deputy Information Officers and Contact Details	20
	Annexure B: Prescribed Fees	22

1 Introduction

This manual is compiled in terms of the Promotion of Access to Information Act 2 of 2000 (“**PAIA**”). The purpose of PAIA is to address Section 32 (2) of the Constitution, which provides that any person has a right to gain access to any information held by a public or private body. If the record is requested from a private body the requester needs to prove that the record is required for the exercise or protection of a right.

In terms of PAIA, Valterra Platinum Limited (“**Valterra Platinum**”) is regarded as a private body and both this manual and the requirements regarding access to records must be in compliance with the provisions of PAIA relevant to private bodies.

One of the requirements specified in PAIA, is the compilation of a manual that provides information on the types and categories of records held by a private body as this relates to PAIA, as well as information relating to the processing of personal information as it relates to the Protection of Personal Information Act, 2013 (“**POPIA**”).

This document serves as the manual of Valterra Platinum and certain of its subsidiary companies (the “**Company**”) in terms of PAIA and provides information of the records held and the process that needs to be followed to request access to such records. The manual also provides information on the personal information processed by the Company from time to time.

2 Abbreviations

Abbreviation	Definition
ACTS	PAIA and POPIA are collectively referred to in this document as the “Acts”
CEO	Chief Executive Officer
BEE	Broad-Based Black Economic Empowerment
DIO	Deputy Information Officer
FICA	Financial Intelligence Centre Act
IO	Information Officer
JSE	Johannesburg Stock Exchange
PAIA	Promotion of Access to Information Act No. 2 of 2000
PGMs	Platinum Group Metals

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

POPIA	Protection of Personal Information Act No. 4 of 2013
SLP	Social and Labour Plan
UIF	Unemployment Insurance Fund
VAT	Value-Added Tax
Valterra Platinum	Valterra Platinum Limited

3 Company overview

Valterra Platinum is one of the world’s leading integrated producers of PGMs, with a primary listing on the Johannesburg Stock Exchange and a secondary listing on the London Stock Exchange. Valterra Platinum operates world-class, long-life mines and the industry’s most efficient processing assets, responsibly mining, smelting and refining PGMs and associated co-products from operations located in South Africa and Zimbabwe. Valterra Platinum has integrated marketing hubs in London, Singapore and Shanghai through which the company sells and trades PGMs.

4 Privacy Governance

Valterra Platinum has implemented policies, standards, procedures and technical safeguards designed to support compliance with PAIA and POPIA. These measures include governance oversight, information security controls, access management, incident response procedures, retention requirements and employee awareness programs.

5 Scope of the Manual

The scope of this manual is to provide a reference regarding the records held by Valterra Platinum. This manual also serves this purpose for the company’s subsidiary companies (the “Related Entities” or a “Related Entity”, as the case may be) that are required by section 51 of PAIA to compile an information manual.

The Related Entities are set out in Annexure A.

This manual will be reviewed and updated on a regular basis by Valterra Platinum and the Related Entities in accordance with the requirements of section 51(2) of PAIA.

6 Availability of the Manual

A copy of this Manual is available on the Valterra Platinum website at www.valterraplatinum.com, at the head office of Valterra Platinum for public inspection during normal business hours, to any person upon request and upon payment of the prescribed fee, and to the Information Regulator upon request. A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

7 Information Officers and Deputy Information Officers

The Chief Executive Officer of Valterra Platinum serves as the Valterra Platinum's Information Officer in terms of section 56 of POPIA and section 1 of PAIA. The Information Officer for each Related Entity is set out in Annexure A. Deputy Information Officers have been designated and registered where required, the details of whom are also set out in Annexure A.

Requests for information relating to Valterra Platinum or any Related Entity in terms of PAIA and/or POPIA must be submitted to the relevant person as set out in Annexure A, as amended from time to time.

8 Guide for requesters on how to use PAIA

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request for information from Valterra Platinum or any Related Entity, the public body must be acting in the public interest. Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided.

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available a revised guide on how to use PAIA ("**the Guide**"), in an easily and comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille.

The Guide contains a description of –

- a. the objects of PAIA and POPIA;
- b. the postal and street address, phone and, if available, electronic mail address of the information officer and deputy information officer of every public body;

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

- c. the manner and form of a request for access to a record of a public body contemplated in section 11 of PAIA and access to a record of a private body contemplated in section 50 of PAIA;
- d. the assistance available from the information officer of a public body in terms of PAIA and POPIA;
- e. the assistance available from the Information Regulator in terms of PAIA and POPIA;
- f. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Information Regulator, and an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Information Regulator or a decision of the head of a private body;
- g. the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- h. the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- i. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- j. the regulations made in terms of section 92 of PAIA.

Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.

The Guide can also be obtained upon request to the Information Officer of Valterra Platinum or from the website of the Information Regulator (inforegulator.org.za/). A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours -

- i. English; and
- ii. Setswana

9 The Information Regulator (South Africa)

The contact details for the Information Regulator are (at present) as follows:

Physical Address: Woodmead North Office Park, 54 Maxwell Dr, Woodmead, Johannesburg, 2191

Telephone number: +27 (0)10 023-5200 / +27 (0)82 746-4173

Website: inforegulator.org.za/

E-mail: enquiries@inforegulator.org.za

10 Automatic availability of certain records

Certain records are available without having to be requested in terms of the request procedures set out in PAIA and detailed in the manual. Subject to the provisions of PAIA, these records may be inspected, purchased or copied at the offices of Valterra Platinum or the Related Entity, and an appointment to view the records will have to be made with the information officer. This includes the following categories of records:

Category of Records	Types of Record	Available on Website	Available on Request
Annual Reports	Integrated Reports, Governance Reports, Remuneration Reports, Financial Statements, Sustainability Reports, Climate Change Reports, Ore Reserves and Mineral Resources Reports, Taxation Reports, Stock Exchange Announcements	Yes	Yes
Corporate Governance	Board Charter, Board Committee Terms of Reference	Yes	Yes
Constitutional Documents	Memorandum of Incorporation, Articles of Association (where relevant), Trust Deeds	No	Yes

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

	(where relevant), Certificates to Commence Business, Certificates of Change of Name		
Corporate Communication	Public Statements and Communications	Yes	Yes
Regulatory	Social and Labour Plans	No	Yes
Policies, Standards and Procedures	Code of Conduct; Metal Sourcing Policy, Business Integrity Policy Safety, Health and Environmental Management Policy; Processed Mineral residue and Waste Water Management structures Policy; Whistleblowing Policy; Responsible Sourcing standard for Suppliers	Yes	Yes
Broad-Based Black Economic Empowerment	B-BBEE certificate and report	Yes	Yes

11 Records Available in Accordance with other legislation

In compliance with Section 51(1)(b)(iii) of PAIA and the Information Regulator's guidance, the following table provides a non-exhaustive list of records maintained by Valterra Platinum and its related entities in accordance with applicable legislation. The table indicates the legislation, examples of records, the department responsible for maintaining such records, and the categories of data subjects to which the records relate. Access to these records may be subject to restrictions under PAIA and other applicable laws. This list is intended as a guide and does not include all records held by the private body.

This list is non-exhaustive and will be updated periodically.

Legislation	Examples of Records	Responsible Department	Data Subject Category
Companies Act 71 of 2008	Incorporation documents, Shareholder registers, Annual returns, Board minutes	Company Secretariat	Shareholders, Directors
Income Tax Act 58 of 1962	Tax returns, PAYE records, VAT records	People and Organisation/ Tax	Employees
Value-Added Tax Act 89 of 1991	VAT submissions, Invoices	Treasury/ Tax	Suppliers, Customers
Basic Conditions of Employment Act 75 of 1997	Employment contracts, Leave records	People and Organisation	Employees
Employment Equity Act 55 of 1998	Employment equity reports, Workforce profiles	People and Organisation	Employees
Labour Relations Act 66 of 1995	Disciplinary records, Collective agreements	People and Organisation	Employees

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Unemployment Insurance Act 30 of 1966	UIF contribution records	People and Organisation	Employees
Mine Health and Safety Act 29 of 1996	Safety audit reports, Incident logs	Safety, Health and Environment	Employees, Suppliers, Contractors
Occupational Health and Safety Act 85 of 1993	Health and safety compliance records	Safety, Health and Environment	Employees
Hazardous Substances Act 15 of 1973	Hazardous material handling records	Safety, Health and Environment	Employees
Mineral and Petroleum Resources Development Act 28 of 2002	Mining rights, Prospecting rights	Land & Mineral Rights Management	Employees, Contractors
National Environmental Management Acts	Environmental impact assessments, Waste management records	Safety, Health and Environment	Employees, Contractors, Community Stakeholders
Financial Markets Act 19 of 2012	Trading records, Investment reports	Treasury/ Marketing/ Corporate Development	Investors
Customs and Excise Act 91 of 1964	Import/export permits	Land & Mineral Rights Management/ Safety, Health, and Environment/ Supply Chain/ Marketing	Suppliers
Medical Schemes Act 131 of 1998	Medical aid contribution records	People and Organisation	Employees

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Compensation for Occupational Injuries and Diseases Act 130 of 1993	Injury reports, Compensation claims	Medical & Occupational Health Services	Employees
Protection of Personal Information Act 4 of 2013	Privacy notices, Consent forms	Legal & Information Management	Employees, Community Stakeholders, Customers
Disaster Management Act 57 of 2002	Emergency response plans	Safety, Health and Environment	Employees, Community Stakeholder
Broad-Based Black Economic Empowerment Act 53 of 2003	BEE certificates, Supplier compliance records	Supply Chain, People and Organisation	Suppliers, Employees

This table satisfies the requirements of Sections 6 and 7 of the Information Regulator template.

12 Processing of Personal Information

In terms of POPIA, a requester to whom certain personal information relates may request Valterra Platinum or the Related Entity concerned to confirm, free of charge, whether or not it holds personal information about that particular requester.

A requester may make a request that Valterra Platinum or Related Entity provides the record or a description of the personal information about the requester which is held by it, including information about the identity of third parties, or categories of third parties, who have, or have had, access to the information. This request must be made within a reasonable time, in a reasonable manner, and format, at a fee, and in a form that is generally understandable.

12.1 Purposes for Processing

The purpose for which personal information is processed by Valterra Platinum and/or the Related Entities will depend on the nature of the information. In general, personal information is processed by Valterra Platinum and/or its Related Entities on one or more of the following grounds:

- with the consent of the data subject;
- to carry out actions for the conclusion or performance of a contract;

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

- to comply with obligations imposed by law;
- to protect the legitimate interests of the data subjects;
- where it is necessary for the performance of a public law duty; or
- where it is necessary for pursuing the legitimate interest of Valterra Platinum, the Related Entities, or a third party to whom the information is supplied.

Valterra Platinum and Related Entities may process special personal information and criminal behaviour information where authorised by POPIA, including occupational health information, biometric access-control information, criminal screening records and medical surveillance information required under mining, health and safety and employment legislation.

The aforementioned examples are non-exhaustive.

12.2 Categories Of Data Subjects and information relating thereto

The following table provides a description of the categories of data subjects and the personal information that may be processed by Valterra Platinum and/or its Related Entities. The list is non-exhaustive and may be updated periodically to reflect changes in processing activities.

Categories of Data Subjects	Personal Information that may be Processed
Employees	Name, Identity Numbers, Qualifications, Gender, Race, Bank Details, Employment History, Medical Records, Background Checks, CVs, Education History, Remuneration and Benefit Information, Performance and Disciplinary Details
Customers / Clients	Name, Address, Contact Details, Transaction Details, Identity Numbers, Banking Information
Consultants	Name, Contact Details, Qualifications, Identity Numbers
Contractors	Name, Contact Details, Identity Numbers, Banking Information
Service Providers	Names, Registration Number, VAT Numbers, Address, Trade Secrets, Banking Information
Suppliers	Name, Registration Number, Contact Details, Banking Information
Directors	Name, Identity Numbers, Contact Details

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Shareholders	Name, Identity Numbers, Contact Details
Visitors	Name, Contact Details
Other Third Parties	Name, Contact Details, Identity Numbers

12.3 Categories of information

In respect of natural persons, personal information may include: name, identifying number (identity or passport number), date of birth, citizenship, age, gender, race, marital status, language, telephone number(s), email address(es), physical and postal addresses, income tax number, banking information, disability information, employment history, medical records, background checks, fingerprints, CVs, education history, remuneration and benefit information, details related to employee performance and disciplinary procedures.

In respect of juristic persons, personal information may include: name, registration number, tax information, contact details, physical and postal addresses, FICA documentation, BEE certificates, payment details (including bank accounts), invoices and contractual agreements.

The above lists are non-exhaustive.

12.4 Categories of Recipients to whom the Personal Information may be supplied

The categories of recipients to whom Valterra Platinum and/or the Related Entities may supply personal information will depend on the nature of the information. In general, such categories of recipients would include:

- Service providers.
- Medical aid, pension, or provident funds.
- Auditing and accounting bodies (internal and external).
- Third parties with whom Valterra Platinum and/or the Related Entities have contracted for the retention of data.
- Relevant authorities, government departments, statutory bodies, or regulators.
- A court, administrative or judicial forum, arbitration or statutory commission making a request in terms of the applicable laws or rules.
- Other subsidiaries of Valterra Platinum.

The above list is non-exhaustive.

12.5 Planned Transborder Flows of Personal Information

Valterra Platinum and/or the Related Entities may transfer personal information to third parties or other subsidiaries of Valtterra Platinum, who are situated in a foreign country. Cross-border transfers are only undertaken where:

- the recipient is subject to laws providing substantially similar protection;
- binding contractual safeguards are in place;
- the transfer is necessary for performance of a contract; or
- another lawful basis under section 72 of POPIA applies.

12.6 Information Security Measures

Valterra Platinum and/or the Related Entities take appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control.

The technical measures include, for example:

- the encryption of documents;
- password protecting files and laptops;
- firewall and anti-virus software;
- intrusion prevention systems.

The organisational measures include, for example:

- limiting individuals who have access to the information;
- individuals who have access are subject to appropriate confidentiality undertakings;
- physical security measures are in place at Valtterra Platinum's premises.

12.7 Retention of Personal Information

Personal information is retained only for as long as necessary to fulfil the purpose for which it was collected, to comply with applicable legal obligations, or to protect the legitimate interests of Valtterra Platinum and its Related Entities. Records are securely destroyed or de-identified when no longer required.

12.8 Data Subjects' Rights

Data subjects may -

- request access to personal information;
- request correction or deletion;
- object to processing;
- withdraw consent where processing is consent-based;
- submit complaints to the Information Regulator.

12.9 Data Breach

Where required by POPIA, Valterra Platinum and Related Entities will notify affected data subjects and the Information Regulator of a security compromise involving personal information.

13 Access Request Procedure

The purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to a record held by Valterra Platinum and Related Entities.

It is important to note that an application for access to information can be refused in the event that the application does not comply with the procedural requirements of PAIA. In addition, the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. In each instance, a requester must identify the right that he, she or they are seeking to exercise by accessing records held by Valterra Platinum or the Related Entity and must give reasons why the particular record or records requested is or are required for the exercise or protection of that right. If a request is made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making the request, which must be reasonably satisfactory to Valterra Platinum and/or a Related Entity. The requester is also required to indicate which form of access to the relevant records is required, and to provide her/his/their contact details in South Africa.

Note: If it is reasonably suspected that the requester has obtained access to Valterra Platinum or Related Entities records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

13.1 Completion of Access Request Form

In order for the Company to respond to requests in a timely manner, [Form 2: Request for Access to Record](#) should be completed, taking due cognisance of the following Instructions on Completion of Forms:

- The [Request for Access to Record](#) form must be completed in the English language.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state “N/A” in response to that question.
- If there is nothing to disclose in reply to a particular question state “nil” in response to that question.
- If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional folio.
- When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

13.1.1 Submission of Access Request Form

The completed [Request for Access to Record](#) Form must be submitted either via conventional mail or e-mail and must be addressed to the relevant information officer as indicated in Annexure A.

An initial, non-refundable R140.00 request fee is payable on submission. This fee is not applicable to Personal Requesters, referring to any persons seeking access to records that contain their personal information.

13.1.2 Payment of Fees

Payment details can be obtained from the Information Officer as indicated above and payment can be made either via a direct deposit, by bank guaranteed cheque or by postal order (no credit card payments are accepted). Proof of payment must be supplied.

Note:

If the request for access is successful an access fee will be required for the search, reproduction and/or preparation of the record(s) and will be calculated based on the [Prescribed Fees](#) (see Annexure B). The access fee must be paid prior to access being given to the requested record.

13.1.3 Notification

Requests will be evaluated, and the requester notified within 30 days of receipt of the completed Access Request Form. Notifications may include:

- a. Notification of Extension Period (if required)
- b. The requesters may be notified whether an extension period is required for the processing of their requests including:
 - i. The amount of the deposit payable (if applicable); and
 - ii. That the requester may lodge a complaint with the Information Regulator or an application with a court against the payment of the deposit and the procedure, including the period, for lodging the complaint or application, respectively.

Please note:

In the event that access is refused to the requested record, the full deposit will be refunded to the requester.

- a. Decision on Request
 - i. If no extension period or deposit is required, a requester will be notified, within 30 days of the decision on their request.
 - ii. If the request for access to a record is successful, the requester will be notified of the following:

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

- The amount of the access fee payable upon gaining access to the record (if any);
 - An indication of the form in which the access will be granted.
 - Notice that the requester may lodge a complaint with the Information Regulator or an application with a court against the payment of the access fee and the procedure, including the period, for lodging the complaint or application, respectively.
- b. If the request for access to a record is not successful, the requester will be notified of the following:
- i. adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal below); and
 - ii. That the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request and the procedure, including the period, for lodging the complaint or application, respectively.

13.1.4 Third Party Information

If access is requested to a record that contains information about a third party, the Valterra Platinum and Related Entities are obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the requested access should be denied.

In the event of the third party furnishing reasons for the support or denial of access, our designated contact person will consider these reasons in determining whether access should be granted, or not.

13.1.5 Grounds for Refusal

Valterra Platinum and the Related Entities may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which Valterra Platinum and Related Entities may refuse access include:

- a. protecting personal information held about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- b. protecting commercial information held about a third party or the Company, the Related Entities and/or other subsidiaries (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organisation or the third party);
- c. if disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement.

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

- d. if disclosure of the record would endanger the life or physical safety of an individual.
- e. if disclosure of the record would prejudice or impair the security of property or means of transport.
- f. if disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme.
- g. if disclosure of the record would prejudice or impair the protection of the safety of the public.
- h. the record is privileged from production in legal proceedings unless the legal privilege has been waived.
- i. disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Company, the Related Entities or other subsidiaries.
- j. disclosure of the record would put the Company, the Related Entities or other subsidiaries at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
- k. the record is a computer programme; and
- l. the record contains information about research being carried out or about to be carried out on behalf of a third party or the Company, the Related Entities or other subsidiaries.

13.1.6 Records that cannot be found or do not exist

If Valterra Platinum or a Related Entity has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

13.1.7 Remedies for Refusal to Request Information

Internal remedy

Valterra Platinum and Related Entities do not have an internal appeal procedure. As such, the decision made by the Information Officer is final, and requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requester is not satisfied with the answer supplied by the Information Officer.

External remedy

Where a requester is not satisfied by a decision made by Information Officer of Valterra Platinum or a Related Entity, s/he/they may submit a complaint to the Information Regulator in the prescribed form, or apply to court for relief, within 180 days of receiving the decision that has caused the grievance. Information regarding complaints and the prescribed complaint forms may be obtained from www.inforegulator.org.za.

13.1.8 Other Information as May be Prescribed

The amended Regulations published in terms of PAIA, under Government Notice R757 in Government Gazette 45057 of 27th August 2021, set out, among other things, the fees which may be charged by private bodies for the reproduction of records (provided below).

14 History of Changes

Reason for Change - Index	
A. As a result of incidents	B. As a result of audit findings
C. New / changes in governance documents	D. Changes in legislation
E Changes in technology	F. Changes in machinery/equipment
G Results of risk assessments	H. Change in training requirements
I. New document format	J. Change due to spelling or grammatical error
K. To integrate a special instruction into the document control system	L. Periodic Review

Date of change	Version	Paragraph revised	Changes Made	Reason Code	Prepared by
2021/06/01	1.0	All	New Document created	C	Compliance
2024/02/20	2.0	All	Periodic Review	L	Compliance
2026/07/24	3.0	All	New / changes in governance documents	C	Compliance

Issued by

Craig Wilson Miller
Chief Executive Officer

Annexure A: Related Entities, Information Officers, Deputy Information Officers and Contact Details

Name	IO and DIO Designation	Contact details
Valterra Platinum Limited	Information Officer: Craig Wilson Miller Deputy Information Officers: - Fiona Jane Edmundson - Adelia Thaver	Postal address: 144 Oxford Road, Melrose Rosebank, 2196. Telephone number: +27 (0)11 373 6111 Email: PlatinumCompliance@Valterraplatinum.com
Valterra Platinum Marketing Limited	Information Officer: Craig Wilson Miller Deputy Information Officers: - Fiona Jane Edmundson - Belinda Dreyer - Adelia Thaver	Postal address: 144 Oxford Road, Melrose Rosebank, 2196. Telephone number: +27 (0)11 373 6111 Email: PlatinumCompliance@Valterraplatinum.com
Thobo Employee Share Ownership Plan (ESOP) Trust	Information Officer: Craig Malander Deputy Information Officers: - Fiona Jane Edmundson - Adelia Thaver	Postal address: 144 Oxford Road, Melrose Rosebank, 2196. Telephone number: +27 (0)11 373 6111 Email: PlatinumCompliance@Valterraplatinum.com
Rustenburg Platinum Mines Limited	Information Officer: Craig Wilson Miller Deputy Information Officers: - Fiona Jane Edmundson - Adelia Thaver	Postal address: 144 Oxford Road, Melrose Rosebank, 2196. Telephone number: +27 (0)11 373 6111 Email: PlatinumCompliance@Valterraplatinum.com

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Name	IO and DIO Designation	Contact details
Whiskey Creek Management Services Proprietary Limited	Information Officer: Simon Kruger Deputy Information Officers: - Fiona Jane Edmundson - Adelia Thaver	Postal address: 144 Oxford Road, Melrose Rosebank, 2196. Telephone number: +27 (0)11 373 6111 Email: PlatinumCompliance@Valterraplatinum.com

Annexure B: Prescribed Fees

A requester has to pay a **request fee** of **R140.00**, other than where the requester is seeking access to a record containing personal information about him, her or themselves. This request fee may be paid at the time a request is made, or the person authorised to deal with such requests on behalf of Valterra Platinum or Related Entity behalf may notify the requester that he, she or they need to pay the request fee before processing the request any further. A requester may apply to the High Court to be exempted from the requirement to pay the request fee.

Where a request for access to a record or records held by Valterra Platinum or a Related Entity is granted, the requester also has to pay an **access fee** for the reproduction of the record or records, and for the search for and the preparation of the records for disclosure. Valterra Platinum or a Related Entity is entitled to withhold a record until the required access fees have been paid. The access fees which are payable are as follows:

(a)	For every photocopy/printed black and white copy of an A4-size page or part thereof.	R2,00
(b)	For every printed copy of an A4-size page or part thereof	R2,00
(c)	For copy in a computer-readable form on: (i) flash drive (to be provided by requester) (ii) compact disc - If provided by requester - If provided to the requester	R40,00 R40,00 R60,00
(d)	For a transcription of visual images, for an A4-size page or part thereof	Service to be outsourced, will depend on quotation from service provider.
(e)	For a copy of visual images	Service to be outsourced, will depend on quotation from service provider.
(f)	For a transcription of an audio record, for an A4-size page	R24,00
(g)	Copy of an audio record, per A4-size page	

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

	(i) flash drive (to be provided by requester)	R40,00
	(ii) compact disc	
	- If provided by requester	R40,00
	- If provided to be requester	R60,00
(h)	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145,00
	To not exceed a total cost of:	R435,00
(i)	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of items (b) to (h).
(k)	Postage, e-mail or any other electronic transfer	Actual expense, if any

The request fee must be paid before the request will be considered.

Where a request for access to a record or records held by Valterra Platinum or a Related Entity is granted, the requester also has to pay an access fee for the reproduction of the record or records and for the search for and the preparation of the records for disclosure. The access fee amount depends on the form in which access is required, and the reasonable time required to search for and prepare the record. The requester will be notified of the amount of the access fee. Valterra Platinum or a Related Entity is entitled to withhold a record until the required access fees have been paid.

If Valterra Platinum or a Related Entity is of the opinion that the search for and the preparation of the records requested will require more than six hours, Valterra Platinum or the Related Entity is entitled to ask for a deposit of one third of the access fees which will be payable in respect of the records requested by the requester. The requester may make an application to the High Court to be exempted from the requirement to pay this deposit. If a deposit is made and access to the records requested is subsequently refused, the deposit will be repaid to the requester.

If a request is granted, the deposit (if any), is payable before the request will be processed and the requested record or portion thereof will only be released once proof of full payment is received.