

**METAL CONCENTRATORS SA (PTY) LTD**  
**PROMOTION OF ACCESS TO INFORMATION MANUAL**

*(Prepared in terms of section 51 of the Promotion of Access to Information Act, 2000 and aligned with the Protection of Personal Information Act, 2013)*

**Updated: May 2026**

## **1. Introduction**

1.1 This information manual ("Manual") has been produced in terms of section 51 of the Promotion of Access to Information Act, 2000 ("PAIA").

1.2 Unless otherwise indicated, terms used in this Manual have the meanings assigned to them in PAIA and the Protection of Personal Information Act, 2013 ("POPIA").

1.3 This Manual also addresses the requirements of POPIA, including the processing of personal information and the rights of data subjects.

## **2. Company Overview**

2.1 MetCon conducts business as a precious metals refiner.

2.2 The company operates within South Africa and processes personal information in the ordinary course of its business.

## **3. Contact Details (Section 51(1)(a))**

3.1 Information Officer

Information Officer: Grant N Crosse  
Email: grant.crosse@metcon.co.za  
Telephone: +27 (0)12 000 4440

3.2 There is no Deputy Information Officer.

3.2 Physical Address

OR Tambo International Airport Special Economic Zone, Precinct 1, Bonaero Drive, 1619

3.3 Website

[www.metcon.co.za](http://www.metcon.co.za)

## **4. Guide (Section 51(1)(b))**

4.1 The Information Regulator has compiled a guide on how to use PAIA.

4.2 The Guide is available from the Information Regulator:

Website: <https://www.justice.gov.za/infoereg/>

## **5. Automatically Available Records (Section 51(1)(c))**

Certain records may be made available on request without formal PAIA procedures, including:

- Company profile
- Standard terms and conditions
- Published policies (where applicable)

## **6. Records Available in Terms of Other Legislation**

MetCon holds records in accordance with applicable legislation, including but not limited to:

- Companies Act, 2008
- Basic Conditions of Employment Act, 1997
- Labour Relations Act, 1995
- Employment Equity Act, 1998
- Income Tax Act, 1962
- VAT Act, 1991
- Unemployment Insurance Act, 2001
- Compensation for Occupational Injuries and Diseases Act, 1993
- Precious Metals Act, 2005
- Protection of Personal Information Act, 2013

## **7. Categories of Records Held (Section 51(1)(e))**

### 7.1 Corporate Records

- Incorporation documents
- Shareholder records
- Board minutes

### 7.2 Financial Records

- Annual financial statements
- Accounting and banking records

### 7.3 Human Resources Records

- Employment contracts
- Payroll and leave records
- Disciplinary records

### 7.4 Customer and Supplier Records

- Contracts
- Transactional records
- Personal information (subject to POPIA safeguards)

### 7.5 Compliance and Operational Records

- SHEQ records
- Regulatory compliance records

## **8. Processing of Personal Information (POPIA)**

### 8.1 Purpose of Processing MetCon processes personal information for:

- Employment purposes
- Client and supplier management
- Compliance with legal obligations

### 8.2 Categories of Data Subjects

- Employees
- Clients
- Suppliers
- Service providers

### 8.3 Categories of Personal Information

- Identification information
- Contact details
- Financial information
- Employment records

### 8.4 Recipients of Personal Information

- Regulatory authorities
- Service providers
- Financial institutions

### 8.5 Information Security Measures

MetCon implements appropriate technical and organisational measures to protect personal information.

## **9. Request Procedure (Section 51(1)(e) & Section 53)**

9.1 Requests must be made using the prescribed form.

9.2 Requests must be submitted using the prescribed PAIA Form (available from the Information Regulator website).

9.3 The requester must provide:

- Sufficient detail of the record
- Proof of identity
- Contact details

9.4 Fees are payable as prescribed by regulation.

## **10. Grounds for Refusal of Access**

Access may be refused where:

- Personal information of third parties is involved
- Confidential commercial information is protected
- Legal privilege applies
- Disclosure is prohibited by law

## **11. Availability of the Manual**

This Manual is available:

- On the company website
- At the company's registered office
- Upon request from the Information Officer

**ANNEXURE**

The prescribed PAIA Request Form (Information Regulator Form 2) is set out below.

**FORM 2**

**REQUEST FOR ACCESS TO RECORD**

[Regulation 7]

**NOTE:**

- 1. Proof of identity must be attached by the requester.
- 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer


(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<b>PARTICULARS OF RECORD REQUESTED</b>			
<p><i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<b>TYPE OF RECORD</b> <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

**FORM OF ACCESS**  
(Mark the applicable box with an "X")

Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

**MANNER OF ACCESS**  
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

**PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

*If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*

Indicate which right is to be exercised or protected	

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

<b>FEES</b>	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

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**FOR OFFICIAL USE**

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**Signature of Information Officer**