



METAL CONCENTRATORS

PROMOTION OF ACCESS TO INFORMATION MANUAL

Effective Date: May 2026

1. INTRODUCTION

This Manual is prepared in accordance with:

- Section 51 of the Promotion of Access to Information Act, 2000 (“**PAIA**”); and
- the relevant provisions of The Protection of Personal Information Act, 2013 (“**POPIA**”)

for **Metal Concentrators SA (Pty) Ltd**, registration number 2007/035881/07, (“**the Company**”).

The purpose of this Manual is to:

- provide a description of the categories of records held by the Company;
- explain how requests for access to records may be made;
- describe the manner in which personal information is processed;
- provide transparency regarding the governance and information practices of the Company.

2. CONTACT DETAILS

2.1 Information Officer

Information Officer: Grant N Crosse

Email: grant.crosse@metcon.co.za

Telephone: +27 (0)12 000 4440

Physical Address: OR Tambo International Airport Special Economic Zone, Precinct 1,
Bonaero Drive, Gauteng, South Africa

Postal Address: Postnet Suite #76, Private Bag X7, Aston Manor, 1619

Website: www.metcon.co.za

2.2 Deputy Information Officer

At the effective date of this Manual, no Deputy Information Officer has been formally designated.

3. PAIA GUIDE

The Information Regulator has compiled a guide in terms of section 10 of PAIA containing information required by persons wishing to exercise rights under PAIA and POPIA.

The Guide is available:

- from the Information Regulator website: <https://www.justice.gov.za/inforeg/>
- at the offices of the Information Regulator; and

Metal Concentrators SA (Pty) Ltd

SEZ: Postnet Suite #76, Private Bag X7, Aston Manor, 1619 **T:** +27 (0) 12 000 4440

CPT: P.O. Box 1142, Milnerfontein, 7435 **T:** +27 (0) 21 510 0770

VAT Reg. No.: 4520250889 **Co. Reg. No.:** 2007/035881/07 **W:** MetCon.co.za



- for inspection at the principal place of business of the Company during ordinary business hours.

The Guide is available in at least two official languages.

4. CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE

The following categories of records may be made available without a formal PAIA request, subject to availability and applicable confidentiality considerations:

- Company profile
- Published policies
- Publicly available marketing material
- Standard terms and conditions
- Website content
- Public corporate information

These records may be accessed:

- on the Company website where applicable;
- by request to the Information Officer; or
- at the registered offices during ordinary business hours.

5. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Records are held in accordance with legislation including, but not limited to:

- Companies Act, 2008
- Income Tax Act, 1962
- Value Added Tax Act, 1991
- Labour Relations Act, 1995
- Basic Conditions of Employment Act, 1997
- Employment Equity Act, 1998
- Unemployment Insurance Act, 2001
- Occupational Health and Safety Act, 1993
- Compensation for Occupational Injuries and Diseases Act, 1993
- Financial Intelligence Centre Act, 2001
- Precious Metals Act, 2005
- Electronic Communications and Transactions Act, 2002
- Protection of Personal Information Act, 2013

6. SUBJECTS AND CATEGORIES OF RECORDS HELD

6.1 Corporate and Governance Records

- Certificates of incorporation
- Memoranda of Incorporation

- Shareholder records
- Director records
- Board resolutions and minutes
- Statutory registers

6.2 Financial Records

- Annual financial statements
- Accounting records
- Management accounts
- Banking records
- Asset registers
- Tax records
- Audit records

6.3 Human Resources Records

- Employment agreements
- Payroll records
- Leave records
- Performance records
- Disciplinary records
- Training records
- Employee benefit records

6.4 Investment and Transaction Records

- Shareholding records
- Investment agreements
- Funding arrangements
- Transaction records
- Due diligence records

6.5 Operational Records

- Supplier agreements
- Customer contracts
- Operational procedures
- SHEQ records
- Insurance records
- Compliance records

6.6 Information Technology Records

- IT policies
- Access control records
- System usage records
- Cybersecurity records

- Data backup records

6.7 Legal and Compliance Records

- Litigation records
- Legal opinions
- Compliance reports
- Regulatory correspondence
- Licences and permits

7. PROCESSING OF PERSONAL INFORMATION

7.1 Purpose of Processing

Personal information is processed for purposes including:

- employment administration;
- business operations;
- client and supplier relationship management;
- legal and regulatory compliance;
- financial administration; and
- risk management and security.

7.2 Categories of Data Subjects

The Company may process personal information relating to:

- employees;
- directors;
- shareholders;
- customers;
- suppliers;
- contractors;
- service providers;
- visitors; and
- business partners.

7.3 Categories of Personal Information

The Company may process:

- identification information;
- contact details;
- financial information;
- employment information;
- transactional information;
- correspondence;
- CCTV and access records; and
- compliance and due diligence information.

7.4 Recipients or Categories of Recipients

Personal information may be shared with:

- regulatory authorities;
- banks and financial institutions;
- auditors and professional advisers;
- IT service providers;
- payroll and benefit administrators;
- insurers; and
- law enforcement authorities where legally required.

7.5 Cross-Border Transfers

The Company may transfer personal information outside South Africa where required for:

- cloud storage;
- IT systems;
- international service providers; and
- business operations.

Where personal information is transferred internationally, appropriate contractual and security safeguards are implemented in accordance with POPIA.

7.6 Information Security Measures

The Company implements reasonable technical and organisational measures to protect personal information, including:

- access controls;
- password protection;
- cybersecurity safeguards;
- secure storage;
- confidentiality undertakings;
- restricted access to sensitive records;
- document retention and destruction procedures; and
- system monitoring and backup procedures.

8. REQUEST PROCEDURE

Requests for access to records must:

- be made using the prescribed Information Regulator request form (<https://inforegulator.org.za/paia-forms/>)
- contain sufficient detail to identify the requested record;
- include proof of identity; and
- specify the form of access required.

Requests must be submitted to the Information Officer.

The requester may be required to pay prescribed fees before access is granted.

9. FEES

Fees payable in terms of PAIA are prescribed by regulation as set out on the Information Regulator web site (<https://inforegulator.org.za/paia-forms/>) and may include:

- request fees;
- search and preparation fees;
- reproduction fees; and
- postage or courier costs.

The requester will be informed of applicable fees before processing proceeds.

10. GROUNDS FOR REFUSAL OF ACCESS

Access to records may be refused on grounds including:

- protection of personal information of third parties;
- protection of confidential commercial information;
- protection of legally privileged information;
- protection of safety and security;
- records prohibited from disclosure by law; and/or
- manifestly frivolous or vexatious requests.

11. AVAILABILITY OF THIS MANUAL

This Manual is available:

- on the Company website;
- at the principal places of business during ordinary business hours;
- from the Information Officer upon request; and
- on the Information Regulator eServices portal where required.

12. ANNUAL REPORTING

Where applicable, the Information Officer shall submit annual reports to the Information Regulator in accordance with section 32 of PAIA.