

**THARISA PLC AND ITS SOUTH AFRICAN SUBSIDIARIES,  
INCLUDING ARXO METALS PTY LTD, ARXO LOGISTICS PTY LTD,  
METQ PTY LTD, UBHOVA SECURITY PTY LTD, BRAESTON PTY  
LTD, THARISA MINERALS PTY LTD, RESPECTIVELY REFERRED  
TO AS**

**“THE COMPANY”**

**AND COLLECTIVELY REFERRED TO AS**

**“THE GROUP”**

**THE GROUP’S PROMOTION OF ACCESS TO INFORMATION  
MANUAL**

**(“Manual”)**

**1. PREAMBLE**

- 1.1. The Promotion of Access to Information Act, 2000 (“**PAIA**”) came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.
- 1.2. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.
- 1.3. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 (“**POPIA**”), which gives effect to everyone’s Constitutional right to privacy. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information.
- 1.4. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.
- 1.5. This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

VERSION	POLICY OWNER	DATE
1.0	The Company	18 June 2021

2. **ABOUT THE GROUP**

The Manual is applicable to the Group and is available to view at 2<sup>nd</sup> Floor, The Crossing, 372 Main Road, Bryanston as well as at [www.tharisa.com](http://www.tharisa.com).

3. **CONTACT DETAILS**

**Name of Private Body:** Tharisa plc and its South African Subsidiaries which include Arxo Metals (Pty) Ltd, Arxo Logistics (Pty) Ltd, MetQ (Pty) Ltd, Ubhova Security (Pty) Ltd, Braeston (Pty) Ltd and Tharisa Minerals (Pty) Ltd, respectively

**Designated Information Officer:** Tharisa plc: Phoevos Pouroulis  
 Arxo Metals (Pty) Ltd: Peter Chennells  
 Arxo Logistics (Pty) Ltd: Elize Rogers  
 MetQ (Pty) Ltd: Gerrit Duvenhage  
 Ubhova Security (Pty) Ltd: William Mpenbe  
 Braeston (Pty) Ltd: Charles Kantor  
 Tharisa Minerals (Pty) Ltd: Alston Smith

**Deputy Information Officer:** Arxo Logistics (Pty) Ltd: Marietjie Beyers  
 MetQ (Pty) Ltd: Johan van Heerden  
 Ubhova Security (Pty) Ltd: Nico Smith  
 Braeston (Pty) Ltd: Anelia Schutte-Bouwer

**Email address of the Information Officer/Deputy Information Officer:** [PAIA@tharisa.com](mailto:PAIA@tharisa.com)

**Postal address:** Postnet Suite 473 • Private Bag X51 • Bryanston • 2021  
 • South Africa

**Street address:** 2nd Floor • The Crossing • 372 Main Road •  
 Bryanston • 2191 • South Africa

**Phone number:** +27(0) 11 996 3500

**Fax number:** +27(0) 11 996 3535

**4. THE INFORMATION AND DEPUTY INFORMATION OFFICERS**

- 4.1. PAIA and POPIA require the appointment of an Information Officer which in relation to a private body means the head of a private body as contemplated in section 1 of PAIA.
- 4.2. Section 56 of POPIA makes provision for the appointed Information Officer to delegate the associated duties and responsibilities to a duly authorised person. All requests to the respective Company for information in terms of the Act must be addressed to the relevant Deputy Information Officer referred to in clause 3 above.
- 4.3. The contact details of the respective Deputy Information Officers and Information Officers are set out in paragraph 3 above.

**5. INFORMATION REGULATORS GUIDE**

- 5.1. An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from Information Regulator in the manner prescribed. Any enquiries regarding the Guide should be directed to:

<b>Postal Address:</b>	JD House  27 Siemens Street  Braamfontein, Johannesburg, 2001
<b>Telephone Number:</b>	[•] [Note: To be updated once the Information Regulator makes this available.]
<b>Fax Number:</b>	[•] [Note: To be updated once the Information Regulator makes this available.]
<b>E-mail Address:</b>	<a href="mailto:infoREG@justice.gov.za">infoREG@justice.gov.za</a>
<b>Website:</b>	<a href="https://www.justice.gov.za/infoREG/">https://www.justice.gov.za/infoREG/</a>

## 6. ENTRY POINT FOR REQUESTS

- 6.1. PAIA provides that a person may only make a request for information, if:
- 6.1.1. The information is requested for the exercise or protection of any rights; and
  - 6.1.2. The person requesting the information complies with the procedural requirements provided for in PAIA relating to a request for access to such information; and
  - 6.1.3. Access to such information is not refused in terms of any ground for refusal contemplated in PAIA.
- 6.2. Information will therefore not be furnished unless a person complies with the requirements referred to in paragraph 6.1.
- 6.3. The Information Officers has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 6.4. The Information Officers will facilitate the liaison with the internal legal team on all of these requests.
- 6.5. All requests in terms of PAIA and this Manual must be addressed to the respective Information Officer using the details in paragraph 3 above.

## 7. AUTOMATICALLY AVAILABLE INFORMATION

- 7.1. Information that is obtainable via the Group's website, [www.Tharisa.com](http://www.Tharisa.com), about the Company is automatically available and need not be formally requested in terms of this Manual.

## 8. INFORMATION AVAILABLE IN TERMS OF POPIA

### 8.1. Categories of personal information collected by the Company

The Company collects information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- 8.1.1. Personal contact detail such as the person’s name, title, addresses, telephone numbers and personal email addresses;
- 8.1.2. information relating to the gender, pregnancy, marital status, age, physical or mental health, well-being and disability;
- 8.1.3. information relating to the education or the medical, financial, criminal or employment history of the person;
- 8.1.4. any identifying number relating to the person;
- 8.1.5. the race or ethnic origin, trade union membership or biometric information of a data subject; or
- 8.1.6. the criminal behaviour of a data subject to the extent that such information relates to-
  - 8.1.6.1. the alleged commission by a data subject of any offence; or
  - 8.1.6.2. any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

**8.2. The purpose of processing personal information**

- 8.2.1. In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which data is processed by the Company will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected. Please also refer to the Company’s Internal and External Privacy Notice for further information.
- 8.2.2. In general, personal information is processed for purposes of dealing with customers, complaints, procurement purposes, records management, security, employment and related matters.

**8.3. A description of the categories of data subjects and of the information or categories of information relating thereto**

The Company holds information and records on the following categories of data subjects:

- Employees / personnel of the Company;
- Any third party with whom the Company conducts business;
- Contractors of the Company and their respective employees;
- Suppliers/service providers of the Company.

(This list of categories of data subjects is non-exhaustive.)

**8.4. The recipients or categories of recipients to whom the personal information may be supplied**

Depending on the nature of the personal information, the Company may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- South African Revenue Services, or another similar authority;
- Third party service providers;
- South African Police Service; and
- Anyone making a successful application for access in terms of PAIA or POPIA.

**8.5. Planned transborder flows of personal information**

- If a data subject visits the Company's website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.
- The Company may need to transfer a data subject's information to third parties in countries outside South Africa for purposes of, including but not limited to:
  - Storing information on a cloud;
  - Performing services; or

- Inter-group and administrative purposes,

in which case it will fully comply with applicable data protection legislation.

- These countries may not have data-protection laws which are similar to those of South Africa.

#### 8.6. **A general description of information security measures to be implemented by the Company**

The Company takes information security measures to ensure the confidentiality, integrity and availability of personal information in our possession.

These measures include appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage which includes common internationally recognised standards and/or practices such as ISO 27000 series (Information Security Management Standards), CoBIT (Control Objectives for Information Technology) and ITIL (Information Technology Infrastructure Library).

### 9. **INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION**

Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation:

- *Arbitration Act 42 of 1965*
- *Basic Conditions of Employment Act 75 of 1997*
- *Broad Based Black Economic Empowerment Act 53 of 2003*
- *Companies Act 71 of 2008*
- *Compensation for Occupational Injuries and Health Diseases Act 130 of 1993*
- *Customs and Excise Act 91 of 1964*
- *Electronic Communications and Transactions Act 25 of 2002*
- *Employment Equity Act 55 of 1998*
- *Environment Conservation Act 73 of 1989*
- *Explosives Act 13 of 1956*
- *Hazardous Substances Act 15 of 1973*
- *Income Tax Act 58 of 1962*
- *Labour Relations Act 66 of 1995*
- *Mine Health and Safety Act 29 of 1996*
- *Minerals Act 50 of 1991*



- *Mineral and Petroleum Resources Development Act 28 of 2002*
- *Mineral and Petroleum Resources Royalty (Administration) Act 28 of 2008*
- *National Credit Act 34 of 2005*
- *National Dust Control Regulations, 2013 under the National Environmental Management: Air Quality Act 39 of 2004*
- *National Environmental Management Act 107 of 1998*
- *National Environmental Management: Waste Act 59 of 2008*
- *National Water Act 36 of 1999*
- *Occupational Diseases in Mines and Works Act 78 of 1973*
- *Occupational Health & Safety Act 85 of 1993*
- *Pension Funds Act 24 of 1956*
- *Prevention and Combatting of Corrupt Activities Act 12 of 2004*
- *Prevention of Organised Crime Act 14 of 1998*
- *Protected Disclosure Act 26 of 2000*
- *Promotion of Access of Information Act 2 of 2000*
- *Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000*
- *Protection of Personal Information Act 4 of 2013*
- *Skills Development Act 97 of 1998*
- *Skills Development Levies Act 9 of 1999*
- *Stock Exchanges Control Amendment Act 54 of 1995 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)*
- *Tax Administration Act 28 of 2011*
- *Trade Marks Act 194 of 1993*
- *Unemployment Contributions Act 4 of 2002*
- *Unemployment Insurance Act 63 of 2001*
- *Value Added Tax Act 89 of 1991*

## 10. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

- 10.1. The Company maintains records on the categories and subject matters listed below. 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 honoured. All requests for access will be evaluated on a case by case basis in accordance with the provisions of PAIA.
- 10.2. Please note further that many of the records held by the Company are those of third parties, such as contractors and employees, and the Company takes the protection of third party confidential information very seriously. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

Category of records	Records
<p><b>Internal records</b></p> <p>The records listed pertain to the Company’s own affairs</p> <p>Some of these categories of records are covered in more detail below</p>	<ul style="list-style-type: none"> <li>• Memoranda and Articles of Association</li> <li>• Financial records</li> <li>• Operational records</li> <li>• Intellectual property</li> <li>• Marketing records</li> <li>• Internal correspondence</li> <li>• Statutory records</li> <li>• Internal policies and procedures</li> <li>• Minutes of meetings</li> </ul>
<p><b>Personnel records</b></p> <p>For the purposes of this section, “<b>personnel</b>” means any person who works for or provides services to or on behalf of the Company and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the Company. This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers.</p>	<ul style="list-style-type: none"> <li>• Any personal records provided to us by our personnel</li> <li>• Any records a third party has provided to us about any of their personnel</li> <li>• Conditions of employment and other personnel-related records</li> <li>• Employment policies and procedures</li> <li>• Internal evaluation and disciplinary records and</li> </ul>
<p><b>Service provider-related records</b></p>	<ul style="list-style-type: none"> <li>• Contracts with the service providers</li> </ul>
<p><b>Transformation and Stakeholder Development Records</b></p>	<ul style="list-style-type: none"> <li>• Records concerning organisations receiving support</li> <li>• Schedules of approved projects</li> <li>• Reports, books, publications and general information</li> <li>• Records and contracts of agreements</li> </ul>
<p><b>Supply Chain Records</b></p>	<ul style="list-style-type: none"> <li>• Purchasing agreements</li> <li>• Supply contract</li> <li>• Vendor list</li> </ul>

Category of records	Records
<b>Strategic Planning Records</b>	<ul style="list-style-type: none"> <li>• Operational plans</li> <li>• Strategic plans</li> </ul>
<b>Corporate Affairs Records</b>	<ul style="list-style-type: none"> <li>• Database of current and past institutional investors</li> <li>• Database of analysts</li> <li>• Media database</li> <li>• General mailing lists</li> <li>• Promotional material</li> <li>• Company article and newspaper records</li> <li>• Presentations on the Company</li> <li>• Market research on the Company and peers</li> <li>• Company press releases</li> <li>• Media coverage on the Company and peers</li> </ul>
<b>Human Resources Records</b>	<ul style="list-style-type: none"> <li>• Collective agreements if any</li> <li>• Human Resources Policies</li> <li>• Employee records relating to:                             <ul style="list-style-type: none"> <li>- Employment</li> <li>- Remuneration and Incentives</li> <li>- Performance Management</li> <li>- Employee Development</li> <li>- Employee Relations</li> <li>- Employee Care</li> <li>- Human Resource Administration</li> <li>- Health and Wellness</li> <li>- Disciplinary Hearings</li> <li>- Employment Equity Plan</li> </ul> </li> </ul>
<b>Treasury Records</b>	<ul style="list-style-type: none"> <li>• Correspondence</li> <li>• Mandates and resolutions</li> <li>• Contracts</li> <li>• Facility letters</li> </ul>
<b>Business Development Records</b>	<ul style="list-style-type: none"> <li>• Information relating to:</li> </ul>

Category of records	Records
	<ul style="list-style-type: none"> <li>- The Company</li> <li>- Third Parties</li> <li>- Mining and resource projects and assets</li> <li>- Transactions and agreements with third parties</li> </ul>
<b>Finance Records</b>	<ul style="list-style-type: none"> <li>• Records for the Company comprise:               <ul style="list-style-type: none"> <li>- Vendor invoices</li> <li>- Remittance advices</li> <li>- Accounts receivable</li> <li>- Banking records</li> <li>- Management and monthly accounts, quarterly and annual financial statements</li> <li>- External audit reports and records</li> <li>- Annual budgets</li> <li>- Fixed asset register</li> <li>- Accounting policies and procedures</li> <li>- Benchmarking</li> <li>- Guarantees, undertakings, subordinations, bonds and similar liabilities</li> </ul> </li> <li>• Other records comprise:               <ul style="list-style-type: none"> <li>- Medical scheme reports</li> <li>- Financial correspondence</li> </ul> </li> </ul>
<b>Mining Rights / Property Records</b>	<ul style="list-style-type: none"> <li>• Agreements to which the Company is party to, including asset acquisitions, disposals and confidentiality agreements</li> <li>• Records relating to:               <ul style="list-style-type: none"> <li>- Mining Rights</li> <li>- Mining Works Programme</li> <li>- Social and Labour Plan</li> </ul> </li> <li>• General Permits/authorisations:               <ul style="list-style-type: none"> <li>- Water usage</li> <li>- Servitudes</li> <li>- Environmental authorisations</li> </ul> </li> </ul>

Category of records	Records
<b>Legal Records</b>	<ul style="list-style-type: none"> <li>• Details of external counsel used by the company (locally and abroad)</li> <li>• Copies of agreements to which the Company is party to</li> <li>• List of current matters</li> <li>• Details of legal proceedings</li> <li>• General legal correspondence</li> </ul>
<b>Tax Records</b>	<ul style="list-style-type: none"> <li>• Tax returns as filed with the South African Revenue Services (“SARS”)</li> <li>• Correspondence with SARS on various issues – including objections to assessments, rulings obtained etc</li> <li>• Documentation on tax advice and opinions obtained from external counsel</li> </ul>
<b>Corporate Finance Records</b>	<ul style="list-style-type: none"> <li>• Circulars and announcements of past transactions</li> <li>• Group valuation models</li> <li>• Dealings with professional advisors</li> <li>• External valuations</li> </ul>
<b>Secretariat Records</b>	<ul style="list-style-type: none"> <li>• Records relating to the Company comprising:               <ul style="list-style-type: none"> <li>- Memoranda of Incorporation</li> <li>- Statutory compliance records</li> </ul> </li> <li>• Shareholders records comprising:               <ul style="list-style-type: none"> <li>- Correspondence and queries</li> <li>- Notices, circulars and minutes of general meetings</li> <li>- Share certificates and transfer forms</li> <li>- Offshore stock exchanges</li> <li>- Dividend declarations and announcements</li> <li>- Share schemes</li> <li>- Shareholders agreements</li> </ul> </li> </ul>

Category of records	Records
	<ul style="list-style-type: none"> <li>• Records concerning Directors and Officers comprising:                             <ul style="list-style-type: none"> <li>- Appointments, resignations and fees</li> <li>- Board and Committee meetings attendance</li> <li>- Group committees and terms of reference</li> </ul> </li> </ul>
<p><b>Information and Communication Technology Records</b></p>	<ul style="list-style-type: none"> <li>• Policies, standards and procedures</li> <li>• Internal reports and correspondence</li> <li>• Agreements with various service providers</li> <li>• Software licensing agreements</li> </ul>
<p><b>Operations Records</b></p>	<ul style="list-style-type: none"> <li>• Current records concerning:                             <ul style="list-style-type: none"> <li>- Administration and management of the operations</li> <li>- Health, safety and environmental reports</li> <li>- Operational reports</li> </ul> </li> </ul>

**11. REQUEST PROCEDURE**

**11.1. Completion of the prescribed form for access to information**

11.1.1. Any request for access to a record in terms of PAIA must substantially correspond with Form C of Annexure B to Government Notice No. R.187 dated 15 February 2002 and should be specific in terms of the record requested. Please refer to **Annexure 1**.

11.1.2. The completed form must be submitted to the Company’s Deputy Information Officer at the postal or physical address or electronic mail address set out in paragraph 3 above and pay a request fee and a deposit, where so advised.

11.1.3. The Prescribed Form C must include sufficient details to enable the Company’s Deputy Information Officer to identify:

11.1.3.1. the record or records requested

- 11.1.3.2. the requester
- 11.1.3.3. the form of access required
- 11.1.3.4. the e-mail, postal address or fax number of the requester
- 11.1.3.5. whether the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
- 11.1.4. The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.
- 11.1.5. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.
- 11.1.6. POPIA provides that a data subject may, upon proof of identity, request the Company to confirm, free of charge, whether or not the Company holds persona information about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information. Such request must be made to the Company on the form attached hereto as **Annexure 2**.
- 11.1.7. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, the Company must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 11.1.8. Grounds for refusal of the data subject's request are set out in PAIA.
- 11.2. **Completion of the prescribed form for objecting against processing of information**
  - 11.2.1. POPIA provides that a data subject may object, at any time, to the processing of personal information by the Company, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as **Annexure 3** and submit it to the respective Deputy

Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

**11.3. Completion of the prescribed form for correction/deletion of information**

11.3.1. A data subject may also request the Company to correct or delete personal information about the data subject in the Company's possession or under the Company's control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that the Company is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

11.3.2. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the respective Deputy Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the form attached hereto as **Annexure 4**.

**11.4. Proof of identity**

Proof of identity is required to authenticate your identity and the request. You will, in addition to the prescribed form, be required to submit proof of identity acceptable to the Company such as a certified copy of your identity document or other legal forms of identity.

Where the request is made on behalf of another person, the requestor must submit proof, in the form of an affidavit or letter of consent, of the capacity in which the requestor is making the request to the satisfaction of the respective Deputy Information Officer.

**11.5. Payment of the prescribed fees**

11.5.1. Section 54 of PAIA entitles the Company to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Regulation 9(2)(c) promulgated under PAIA.

11.5.2. There are two categories of fees which are payable:

11.5.2.1. The request fee: R50



11.5.2.2. The access fee: 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 5**.

11.5.3. When the request is received by the Deputy 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.

11.5.4. Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

11.5.5. A requester whose request for access to a record has been granted must pay an 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.

11.5.6. If a deposit has been paid for a request for access, which is refused, then the Deputy Information Officer must repay the deposit to the requester.

#### 11.6. **Fees For Reproduction**

Where a private body has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records will be a fee for reproduction of the record in question.

The applicable fees payable are set out in **Annexure 6**.

#### 11.7. **Deposits**

Where the Company receives a request for access to information held on a person other than the requester and the respective Deputy Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than six hours, a deposit is payable by the requester.

The amount of the deposit is equal to one-third of the amount of the applicable access fee (excluding VAT). See **Annexure 6**.

**11.8. Collection of Fees**

Bank deposit is the only accepted payment method for PAIA requests. Banking details to be provided on request.

**11.9. Timelines for consideration of a request for access**

11.9.1. Requests will be processed as prescribed by PAIA which should be within 30 (thirty) days.

11.9.2. The 30 (thirty) day period may be extended for a further period of not more than 30 (thirty) days as provided for in PAIA.

11.9.3. Should an extension be given, the Company will notify the requester in writing and will also provide the procedure involved should the requestor wish to apply to court against the extension. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

**11.10. Grounds for refusal of access and protection of information and third party notification**

11.10.1. There are various grounds upon which a request for access to a record may be refused as provided in PAIA.

11.10.2. If the request for access to information affects a third party, then such third party must first be informed as provided in PAIA.

**12. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS**

12.1. If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

12.2. There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

12.3. Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

**13. AVAILABILITY OF THIS MANUAL**

Copies of this Manual are available for inspection, free of charge, at the offices of the Company at 2<sup>nd</sup> Floor, The Crossing, 372 Main Road, Bryanston, Johannesburg.

The Manual is also available on the Group's website at [www.tharisa.com](http://www.tharisa.com).

**Annexure 1**

**FORM C: REQUEST FORM**

**ACCESS REQUEST FORM**

**Particulars of the Companys Deputy Information Officer**

Requests can be submitted either via post, e-mail or fax and should be addressed to the Deputy Information Officer as indicated below:

**Deputy Information Officer:** [•]

**Physical Address:** [•]

**Postal Address:** [•]

**Telephone Number:** [•]

**E-mail:** [•]

**Fax Number:** [•]

**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 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:**

**Particulars of person requesting access to the record (if a legal entity)**

- a) *The particulars of the entity 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 capacity in which the request is made, if applicable, must be attached.*

**Name of entity:**

**Registration number:**

**Postal address:**

**Fax number:**

**Telephone number:**

**E-mail address:**

**Particulars of person on whose behalf request is made**

*This section must ONLY be completed if a request for information is made on behalf of another person.*

**Full names and  
surname:**

**Identity number:**

**Particulars of record**

- a) *Provide full particulars of the record to which access is requested, including the reference number if it is known to you, to enable the record to be requested.*
- b) *If the space provided is inadequate, please use a separate folio and attach it to this form. Please sign any additional folios.*

**Description of record or relevant part of the  
record:**

**Reference number (if available):**

**Any further particulars of record:**

**FEES**

- a) *A request for access to a record will be processed only after a request fee has been paid.*
- b) *You will be notified of the amount to be paid as the request fee.*
- c) *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.*
- d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

**Reason for exemption of payment of fees:**

**FORM OF ACCESS TO RECORD**

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 under certain circumstances. In such a case you will be informed whether access will be granted in another form.*
- c) *The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.*

If the record is in written or printed form

<input type="checkbox"/>	Copy of record	<input type="checkbox"/>	Inspection of record
If record consists of visual images			

<input type="checkbox"/>	View the images	<input type="checkbox"/>	Copy of the images	<input type="checkbox"/>	Transcription of the images
If the record consists of recorded information that can be reproduced in sound					

<input type="checkbox"/>	Listen to the soundtrack (audio)	<input type="checkbox"/>	Transcription of soundtrack
--------------------------	----------------------------------	--------------------------	-----------------------------

If the record is held on computer or in an electronic or machine-readable form (this includes photographs, slides, video recordings, computer generated images, sketches etc.)

<input type="checkbox"/>	Printed copy of record	<input type="checkbox"/>	Printed copy of information derived from the record	<input type="checkbox"/>	Copy in computer readable form
--------------------------	------------------------	--------------------------	---	--------------------------	--------------------------------

If you requested a copy or transcription of a record (above) do you wish the copy of transcription to be posted to you? Note that postage is payable.

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
--------------------------	-----	--------------------------	----

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.

In which language would you prefer the record?

---

**In the event of a disability**

*If you are prevented by a disability from reading, viewing or listening to the record, state your disability and indicate in the form in which the record is required:*

**Disability**

**Form in which record is required**

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

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

**1. Indicate the right to be exercised or protected:**

---

---

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

---

**NOTICE OF DECISION REGARDING REQUEST FOR ACCESS**

*You will be notified in writing whether your request has been approved or 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?**

---

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Signed at..... on this ..... day of .....20....

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SIGNATURE OF REQUESTER/PERSON  
ON WHOSE BEHALF REQUEST IS MADE

PRINT NAME:

**YOU MUST**

- 1 Complete all necessary spaces
- 2 Sign the access request form Sign
- 3 Sign additional folios completed

**SEND WITH THIS APPLICATION**

- 1 The request fee
- 2 Any additional folios completed
- 3 Copy of Identity Document

**Annexure 6 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	<b>The fees for reproduction referred to in regulation 11(1) are as follows:</b>	
(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)	<b>For a copy in a computer-readable form on -</b>	
(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
(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	<b>The access fees payable by a requester referred to in regulation 11(3) are as follows:</b>	
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)	<b>For a copy in a computer-readable form on -</b>	
(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
(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 reasonably required for such search and preparation.	
4.2	<b>For purposes of section 54(2) of the Act, the following applies:</b>	
(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	<b>The actual postage is payable when a copy of a record must be posted to a requester.</b>	

**Annexure 2**

**POPIA DATA SUBJECT ACCESS REQUEST FORM**

**Request Form**

Under section 23 of the Protection of Personal Information Act, 2013

**Particulars of the Company's Deputy Information Officer**

Requests can be submitted either via post, e-mail or fax and should be addressed to the Deputy Information Officer as indicated below:

**Deputy Information Officer:** [•]

**Physical Address:** [•]

**Postal Address:** [•]

**Telephone Number:** [•]

**E-mail:** [•]

**Fax Number:** [•]

If request is for **access to or copies of** your own personal information records:

Last name appearing on records:  same as below, or: \_\_\_\_\_

Mr.     Mrs.     Ms.     Miss                      Last Name: \_\_\_\_\_  
 First Name: \_\_\_\_\_                      Middle Name: \_\_\_\_\_  
 Address: (Street/Apt. No./P.O. Box.)                      City/Town: \_\_\_\_\_  
 \_\_\_\_\_  
 Province: \_\_\_\_\_                      Postal Code: \_\_\_\_\_  
 Telephone Number (Day): (    ) \_\_\_\_\_ Telephone Number (Evening): (    ) \_\_\_\_\_

Detailed description of requested records and/or personal information. (If you are requesting access to your personal information, please identify the personal information record containing the person information, if known.)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

<b>Preferred method of access to records:</b> <input type="checkbox"/> Examine Original <input type="checkbox"/> Receive Copy	Signature: _____	Date: _____
	_____	

Responsible Party Use

Date Received:	Request Number:	Comment

Personal Information contained on this form is collected pursuant to the Protection of Personal Information Act, 2013 and will be used for the purpose of responding to your request. Questions about this collection should be directed to the Information Officer at the contact details set out above.

**Annexure 3**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

[Regulation 2]

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code (     )
Contact number(s):	
Fax number / E-mail address:	

<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f)</b> <i>(Please provide detailed reasons for the objection)</i>

Signed at ..... this ..... day of .....20.....

.....

*Signature of data subject/designated person*

**Annexure 4**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

[Regulation 3]

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an “x”.

**Request for:**

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	



Residential, postal or business address:	
	Code (      )
Contact number(s):	
Fax number/E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code (      )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED</b>

<b>D</b>	<b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a)</b>
	<b>WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or</b>
	<b>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b)</b>
	<b>WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</b>
	<i>(Please provide detailed reasons for the request)</i>

Signed at ..... this ..... day of .....20.....

.....

*Signature of data subject/ designated person*