

NORTHAM

PLATINUM HOLDINGS LIMITED

(Registration number 2020/905346/06)
(Incorporated in the Republic of South Africa)
("Northam" or "the company")

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO.2 OF 2000 ("the Act")

Date updated: 21 December 2021

(Original manual published in the Government Gazette No.24448 on 18 February 2003).
This manual applies to Northam and the following entities:

Subsidiaries:

1.	Northam Platinum Limited	1977/003282/06
2.	Booyendal Platinum Proprietary Limited	2002/016771/07
3.	Eland Platinum Proprietary Limited	2016/427918/07
4.	Mining Technical Services Proprietary Limited	2011/004032/07
5.	Mvelaphanda Resources Proprietary Limited	1980/001395/07
6.	Norplats Properties Proprietary Limited	2005/013135/07
7.	Northam Platinum Investments (US) Incorporated	6518607
8.	Northam Property Services LLC (US)	6518631
7.	Northam Recovery Services LLC (US)	6518615
9.	Zambezi Platinum (RF) Limited	2014/106927/06

Trusts:

1.	The Buttonshope Conservancy Trust	IT3300/2011
2.	The Northam Booyendal Community Trust	IT000178/2015
3.	The Northam Employees' Trust	IT000173/2015
4.	The Northam Zondereinde Community Trust	IT000177/2015
5.	Northam Platinum Restoration Trust Fund	T8288/96
6.	Toro Employee Empowerment Trust	3265/08/01

PART 1

(Information required under Section 51(1)(a) of the Act

Name of body: Northam
Authorised head of body: Mrs A H Coetzee – Information Officer
Address: Building 4, 1st Floor, Maxwell Office Park,
Magwa Crescent West, Waterfall City,
Jukskei View, 2090.

Postal address: P O Box 412694
Craighall, 2024

Telephone No. +27 11 759 6000
e-mail: information.officer@norplats.co.za

PART 2

Information required under Section 51(1)(b)(i) of the Act

A guide on how to use the Act as compiled by the Human Rights Commission and updated by the Information Regulator in terms of Section 10 of the Act is available from the Information Regulator.

Please direct any queries in this regard to:

INFORMATION REGULATOR

Office: JD House
27 Stiemens Steet
Braamfontein
Johannesburg
2001

Website: <https://www.justice.gov.za/inforeg/index.html>
E-mail: enquiries@infoeregulator.org.za

PART 3

Categories of Records Available without having to make a request in terms of Section 52(1)(a) of the Act

Information available on the company's website (www.northam.co.za) is accessible to anyone who has access to the internet and contains information about the company's operations and financial results. This includes:

- Annual integrated reports.
- Sustainability reports.
- Interim reports.
- Preliminary announcements of results.
- Press releases.
- Board charter.

- Board committee charters.
- Code of ethics and conduct.
- Environmental policy.
- King III compliance report.
- Northam memorandum of incorporation.
- Sustainable development policy.

PART 4

(Information required under Section 51(1) (b)(iii) of the Act)

Records are kept in accordance with the following legislation, as amended from time to time:

1. Basic Conditions of Employment Act No. 75 of 1997
2. Companies Act No. 71 of 2008
3. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
4. Customs and Excise Act No. 91 of 1964
5. Deeds Registries Act No. 47 of 1937
6. Electronic Communications Act No. 36 of 2005
7. Electronic Communications and Transactions Act No. 25 of 2002
8. Employment Equity Act No. 55 of 1998
9. Environmental Conservation Act No. 73 of 1989
10. Explosives Act No. 15 of 2003
11. Financial Intelligence Centre Act No. 38 of 2001
12. Firearms Control Act No. 60 of 2000
13. Hazardous Substances Act No. 15 of 1973
14. Income Tax Act No. 58 of 1962
15. Labour Relations Act No. 66 of 1995
16. Medical Schemes Act No. 131 of 1998
17. Mine Health and Safety Act No. 29 of 1996
18. Mineral and Petroleum Resources Development Act No. 28 of 2002
19. Mineral and Petroleum Resources Royalty (Administration) Act No. 29 of 2008
20. Mineral and Petroleum Resources Royalty Act No. 28 of 2008
21. National Environmental Management Act No. 107 of 1998
22. National Environmental Management: Air Quality Act No. 39 of 2004
23. National Environmental Management: Biodiversity Act No. 10 of 2004
24. National Environmental Management: Protected Areas Act No. 57 of 2003
25. National Environmental Management: Waste Act No. 59 of 2008
26. National Water Act No. 36 of 1998
27. Occupational Diseases in Mines and Works Act No. 78 of 1973
28. Occupational Health and Safety Act No. 85 of 1993
29. Patents Act No. 57 of 1978
30. Pharmacy Act No. 53 of 1974
31. Pension Funds Act 24 of 1956
32. Private Security Industry Regulation Act No. 56 of 2001
33. Promotion of Access to Information Act No. 2 of 2000
34. Protection of Personal Information Act No.4 of 2013
35. Securities Services Act No. 36 of 2004 (replaced by the Financial Markets Act 19 of 2012)
36. Skills Development Act No. 97 of 1998
37. Skills Development Levies Act No. 9 of 1999
38. Tax Administration Act No.28 of 2011
39. Trade Marks Act No. 194 of 1993
40. Transfer Duty Act No. 40 of 1949
41. Trust Property Control Act No. 57 of 1988

- 42. Unemployment Insurance Act No. 63 of 2001
- 43. Unemployment Insurance Contributions Act No. 4 of 2002
- 44. Value-Added Tax Act No. 89 of 1991

Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of the Act.

PART 5

(Information required under Section 51(1)(b)(iv) of the Act)

The following is a description of the categories of records held by the company that may be requested and for which access may be provided or refused:

Company Secretarial

- ✓ Company statutes
- ✓ Minute books
- ✓ Attendance registers
- ✓ Statutory returns
- ✓ Annual Financial Statements
- ✓ Shareholder register

Compliance

- ✓ Codes of Practice
- ✓ Exemptions
- ✓ Permissions
- ✓ Standard operating procedures

Finance and Commercial

- ✓ Accounting records (Integrated reports)
- ✓ Budgets and forecasts
- ✓ Contracts
- ✓ External and internal audit reports
- ✓ Management reports
- ✓ Policies and procedures
- ✓ Statistic returns

General Administration and internal communications

- ✓ Policies and procedures

Health, Safety and Environmental matters

- ✓ Records of legal appointments
- ✓ Reportable accidents investigations

- ✓ Lost time incidents
- ✓ Hazard Identification and Risk Assessments
- ✓ Health & Safety Policy
- ✓ Minutes of Health & Safety meetings
- ✓ Safety checklists
- ✓ Accident reports and statistics
- ✓ Audit reports
- ✓ Environmental Management Programme Report
- ✓ Environmental rehabilitation cost estimates
- ✓ Policies and procedures
- ✓ Mandatory Codes of practice
- ✓ Quarterly report to the chief pollution control officer
- ✓ Listing of the hazardous substances
- ✓ Nuclear sources inspection records
- ✓ Airborne pollutant monitoring records
- ✓ Groundwater quality monitoring records

Human Resources

- ✓ Agreements of employment
- ✓ Benefit arrangements rules and regulations
- ✓ Employee information
- ✓ Employment equity plan
- ✓ Forms and applications
- ✓ Policies and procedures
- ✓ Standard letters and notices
- ✓ Trade Union agreements and files
- ✓ Trade Union membership
- ✓ Skills development plan

Insurances

- ✓ Policies
- ✓ Insurance claim files

Marketing

- ✓ Market information
- ✓ Marketing agreements

Movable and immovable property and mining titles

- ✓ Lease agreements
- ✓ Mining authorisation
- ✓ Mining licenses
- ✓ Title deeds

National Qualifications Framework

- ✓ Record of Learning (ROL) for each Learner (Employee and Other)
- ✓ The ROL will list each credit that the Learner has achieved for Unit Standards (US's) registered on the NQF
- ✓ "On-Job" Unit Standards
- ✓ "Off-Job" Unit Standards
- ✓ Detail of training providers/companies
- ✓ Employee contracts/service agreements
- ✓ Details of courses and training records
- ✓ Employee qualifications and unit standards

Operational information

- ✓ Information Technology Systems documentation and manuals
- ✓ Policies and procedures
- ✓ Production statistics
- ✓ Reports and supporting documentation

Pension/Provident Fund and Medical scheme

- ✓ Rules relating to Provident/Pension Fund and medical scheme
- ✓ Communication from/to Provident/Pension Fund and medical scheme
- ✓ Employee dependants
- ✓ Membership
- ✓ Monthly payments and reconciliations

Security

- ✓ Ammunition and firearm register
- ✓ Polygraph results
- ✓ Explosive registers

Survey information

- ✓ Survey field notes
- ✓ Survey calculations
- ✓ Peg index register
- ✓ Plans relevant to that mine
- ✓ Holing/gas/water warning notes

Ventilation records

- ✓ Letters of appointment of the Ventilation Officer and Fire Master
- ✓ Records of methanometer/flammable gas warning devices issued and returned
- ✓ Records of lamps issued and returned
- ✓ Records on self-contained self-rescuers
- ✓ Reports on Environmental conditions
- ✓ Records of all occupational hygiene/health measurements

Taxation

- ✓ Returns and assessments in respect of the various taxes that apply to the company

NOTE: the company will not give access to records containing the following information:

- Personal information about employees or a third person

- Trade secrets or confidential information about a third person
- Information relating to the safety of a third person
- Privileged information
- Trade secrets or confidential information of the company or its business partners
- Information under a non-disclosure, confidentiality or like agreement, or contracts which are confidential or contain commercially or financially sensitive information

PART 6

(Availability of this manual in terms of Section 51 (3) of the Act is as per the prescribed fee).

In accordance with Paragraph 5 (1) of the Regulations Relating to the Promotion of Access to Information, 2021 (Regulations R757 dated 27 August 2021) (the "**Regulations**"), this manual has been made , published on Northam's website (www.northam.co.za).

A hard copy of this manual is available for inspection at Northam's Corporate Office, Building 4, 1st Floor, Maxwell Office Park, Magwa Crescent West, Waterfall City, Jukskei View, 2090. (att: the Company Secretary).

PART 7

(Prescribed fees in terms of Annexure B of the Regulations Relating to the Promotion of Access to Information, 2021 (Regulation R757 dated 27 August 2021))

- 1) The request fee payable by every requester in terms of Annexure B of the 2021 Regulations in respect of public bodies is R100.00.
 - 2) The fee for a copy of the manual of a public body, as contemplated in Annexure B of the 2021 Regulations is R1.50 (including VAT) for every photocopy of an A4-size page or part thereof.
- 2) The fees for reproduction are as follows:

	Fee (ZAR)
(a) For every photocopy of an A4-size page or part thereof	1.50
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	1.50
(c) For a copy in a computer-readable form on -	
(i) flash drive (to be provided by requestor)	40.00
(ii) compact disc	
If provided by requestor	40.00
If provided to the requestor	60.00

(d)	(i)	For a transcription of visual images for an A4-size page or part thereof	Services outsourced	
	(ii)	For a copy of visual images	will depend on the quotation form service provider	
(e)	(i)	For a transcription of an audio record, for an A4-size page or part thereof		24.00
	(ii)	For a copy of an audio record flash drive (to be provided by requestor)		40.00
		compact disc		
		If provided by requestor		40.00
		if provided to the requestor		60.00
3) The request fee payable by a requester in respect of private bodies is R140.00.				
4) The access fees payable by a requester in respect of a private body, referred to in Annexure B of the 2021 Regulations are as follows:				
				Fee
	(a)	For every photocopy of an A4-size page or part thereof		2.00
	(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form		2.00
	(c)	For a copy in a computer-readable form on –		
	(i)	flash drive (to be provided by		40.00
	(ii)	requestor)		
		compact disc		
		If provided by the requestor		40.00
		If provided to the requestor		60.00
(d)	(i)	For a transcription of visual images, for an A4-size page or part thereof	Services outsourced	
	(ii)	For a copy of visual images	will depend on the quotation form service provider	
(e)	(i)	For a transcription of an audio record, for an A4-size page or part thereof		24.00

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| (ii) For a copy of an audio record | |
| Flash drive (to be provided by the requestor) | 40.00 |
| Compact disc | |
| If provided by the requestor | 40.00 |
| If provided to the requestor | 60.00 |
| (f) To search for and prepare the record for disclosure, for each hour or part of an hour reasonably required for such search and preparation. | 145.00 |
| To not exceed a total cost of | 435.00 |
- (2) For purposes of section 54(2) of the Act, the following applies:
- (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.
- (3) The actual postage is payable when a copy of a record must be posted to a requester.

PART 8

(Prescribed form for a request for information in terms of Section 53 (1) of the Act)

A person requesting information or access to information must complete Form C, and either mail it, fax it or e-mail it to Northam.

FORM 2

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Regulation 7 of the 2021 Regulations)

Request for access to record

Particulars of [the company]

Name of [the company]:	<i>[insert name]</i>
Registration number	<i>[insert]</i>
The Head:	<i>[insert]</i>
Physical Address:	<i>[insert]</i>

Postal Address: [insert]

Telephone: [insert]

Telefacsimile: [insert]

E-mail: [insert]

Particulars of person requesting access to the record

The full particulars of the person who requests access to the record must be given below.
The address and/or fax number in the Republic to which the information is to be sent must be given.
Proof of the 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 request is made when made on behalf of another person:

Particulars of person on whose behalf request is made

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

Full names and surname: _____

Identity Number: _____

Particulars of record

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

Description of record or relevant part of the record:

Reference number, if available:

Any further particulars of record:

Fees

A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.

You will be notified of the amount required to be paid as the request fee.

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.

If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

Form of access to record

If you are prevented by an impediment or disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability: _____ _____ _____		Form in which record is required: _____ _____ _____	
----------------------------------------------------	--	--------------------------------------------------------------------------	--

Mark the appropriate box with an "X":

NOTES:

Compliance with your request in the specified form may depend on the form in which the record is available.

Access in the form requested may be refused in certain circumstances. In such case, you will be informed if access will be granted in another form.

The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:			
	Copy of record*		Inspection of record
2. If the record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):			
	View the images		Copy of the images*
			Transcription of the images*
3. If the record consists of recorded words or information which can be reproduced in sound:			
	Listen to the soundtrack (audio cassette)		Transcription of soundtrack (written or printed document)*
4. If the record is held on computer or in an electronic or machine-readable form:			
	Printed copy of record*		Printed copy of information derived from the record*
			Copy in computer readable form* (stiffy or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			YES
			NO

Particulars of the right to be exercised or protected

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

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:**

Notice of decision regarding request for access

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

Signed at _____ this _____ day of _____ 20__.

SIGNATURE OF REQUESTER/PERSON ON
WHOSE BEHALF REQUEST IS MADE