



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) and aligned to the Protection of Personal Information Act, 2013

This manual applies to ASSORE HOLDINGS PROPRIETARY LIMITED

Registration Number 2019/052159/07 (the "Company")

(Including all entities as set out in Annexure A)

This Manual was originally approved and issued on 19 June 2025 and was last reviewed and updated on 19 June 2026.

Registered office address:

Assore House, 15 Fricker Road, Illovo Boulevard, Johannesburg, 2196

Copy of the manual is available for inspection at the Company's registered office and is available on the company website at: www.assore.com

TABLE OF CONTENTS

INTRODUCTION

1. LIST OF ACRONYMS AND ABBREVIATIONS
2. PURPOSE OF PAIA MANUAL
3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION
 - 3.1 INFORMATION OFFICER
 - 3.2 DEPUTY INFORMATION OFFICER
 - 3.3 GENERAL ACCESS TO INFORMATION CONTACT
 - 3.4 HEAD OFFICE
4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE
5. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS
6. DESCRIPTION OF THE RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION
7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD
8. PROCESSING OF PERSONAL INFORMATION
9. AVAILABILITY OF THE MANUAL
10. UPDATING OF THE MANUAL

INTRODUCTION

The Promotion of Access to Information Act, 2000 (“PAIA” or “the Act”) gives effect to the constitutional right of access to information held by t by private bodies, where such information is required for the exercise or protection of any rights. In terms of PAIA, a requester may request access to records held by a private body or public body, and access must be granted where the requester complies with the requirements of the Act and no lawful ground for refusal applies.

This manual is prepared in accordance with Section 51 of PAIA and sets out the procedures and requirements to be followed by requesters seeking access to records held by Assore Holdings Proprietary Limited and its subsidiaries (collectively referred to as “the Group”).

The Protection of Personal Information Act, 2013 (“POPIA”) gives effect to the constitutional right to privacy by safeguarding personal information when processed by public and private bodies. POPIA establishes conditions for the lawful processing of personal information and provides data subjects with rights in respect of their personal information.

The Information Regulator is responsible for the oversight and enforcement of both PAIA and POPIA. The Group is committed to the principles of transparency, accountability, and lawful processing of information, and this manual is intended to facilitate the exercise of rights in terms of PAIA and POPIA.

1. LIST OF ACRONYMS AND ABBREVIATIONS

“DIO” Deputy Information Officer;

“IO“Information Officer;

“PAIA” Promotion of Access to Information Act No. 2 of 2000 (as amended);

“POPIA” Protection of Personal Information Act No.4 of 2013;

“Regulator” Information Regulator; and

“Republic” Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is intended to assist members of the public to:

2.1 identify the categories of records held by the Group that are available without the need to submit a formal request in terms of PAIA;

2.2 understand the procedure to be followed when requesting access to records held by the Group, including a description of the subjects on which such records are held and the categories of records available in respect thereof;

2.3 identify the records of the Group which are available in accordance with applicable legislation other than PAIA;

2.4 obtain the contact details of the Information Officer and any Deputy Information Officer(s) designated to assist with requests for access to information;

2.5 access the Guide on how to use PAIA, as published by the Information Regulator, and understand how to obtain access to such Guide;

2.6 understand whether the Group processes personal information and, if so, the purpose of such processing, together with a description of the categories of data subjects and the categories of personal information processed;

2.7 understand the categories of recipients to whom personal information may be disclosed;

2.8 understand whether personal information may be transferred outside the Republic of South Africa and, where applicable, the categories of recipients in such jurisdictions; and

2.9 understand whether the Group has implemented appropriate measures to ensure the confidentiality, integrity, and availability of personal information processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

3.1 Information Officer

The designated Information Officer for the Group is:

Name: Ms Janine Govender

Telephone: +27 11 770 6841

Email: compliance@assore.com

3.2 Deputy Information Officer(s)

The designated Deputy Information Officer is:

Name: Calvin Norkee

Telephone: +27 11 770 6972

Email: compliance@assore.com

3.3 General Access to Information Contact

All requests for access to information in terms of PAIA must be submitted to:

Email: compliance@assore.com

For purposes of this Manual, “the Group” includes Assore Holdings Proprietary Limited and its subsidiaries, as set out in Annexure A.

Records may be held by different entities within the Group structure. All requests for access to records must be submitted to the Information Officer, who will coordinate the processing of such requests with the relevant entity or entities within the Group.

Requests may be submitted electronically and will be processed in accordance with PAIA.

3.4 Head Office

Physical Address:

Assore House

15 Fricker Road

Illovo Boulevard

Johannesburg, 2196

Telephone: +27 11 770 6800

Website: www.assore.com

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1 The Information Regulator has, in terms of section 10(1) of PAIA, as amended, compiled and made available a Guide on how to use PAIA (“the Guide”), in a manner that is reasonably accessible to any person who wishes to exercise a right in terms of PAIA and POPIA.

4.2 The Guide is available in all official languages and in accessible formats.

4.3 The Guide contains information relating to:

- the objects of PAIA and POPIA;
- the manner and form of requesting access to records held by public and private bodies;
- the assistance available from the Information Officer and the Information Regulator; and
- the remedies available in law where access to records is refused.

4.4 A copy of the Guide may be obtained:

- from the Information Regulator’s website: <https://www.justice.gov.za/inforeg/>; or
- upon request from the Information Officer of the Group.

4.5 Prescribed forms in terms of PAIA and POPIA are available from the Information Regulator’s website at:

<https://inforegulator.org.za/paia/>

5. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Records	Types of Records	Manner of Access
Public Information	Information published on the relevant company websites	Available on the relevant company websites
Marketing and Communications	Publicly available brochures, media releases, and announcements	Available on the relevant company website or through established distribution channels
Statutory Information	Records available from public registries (e.g. CIPC filings, where applicable)	Available from relevant regulatory authorities

The inclusion of any record in this section does not constitute an automatic right of access to such records.

6. DESCRIPTION OF THE RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

The Group retains records in accordance with applicable South African legislation. Certain records held by the Group may be accessible in terms of such legislation, subject to the provisions and restrictions contained therein.

The following is a non-exhaustive list of legislation in terms of which the Company holds records:

Category of Records	Applicable Legislation
Company and corporate records	Companies Act 71 of 2008
Taxation records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of

	1991
Employment and labour records	Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998
Occupational health and safety records	Occupational Health and Safety Act 85 of 1993; Mine Health and Safety Act 29 of 1996 (where applicable)
Information and data protection records	Promotion of Access to Information Act 2 of 2000; Protection of Personal Information Act 4 of 2013
Financial and anti-money laundering records	Financial Intelligence Centre Act 38 of 2001
Pension and employee benefits records	Pension Funds Act 24 of 1956

This list is not exhaustive and may be amended from time to time to reflect changes in legislation or the operations of the Company.

The inclusion of any record in this section does not constitute an automatic right of access to such records.

Access to records is subject to the applicable provisions and restrictions of the relevant legislation and, where applicable, the provisions of PAIA.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD

The Group holds records in the ordinary course of its business operations and in compliance with applicable legal and regulatory requirements.

Records are maintained across a range of functional areas within the Group and may be held in physical or electronic form.

The Group holds records which include, but are not limited to, the following general categories:

- corporate and administrative records;
- financial and accounting records;
- human resources records;
- information technology records;
- legal and compliance records;
- operational records; and
- records required to be maintained in terms of applicable legislation.

The inclusion of any category of records in this Manual does not confer a right of access to such records.

Access to records will be granted only in accordance with the provisions of PAIA and subject to any applicable grounds for refusal in terms of Chapter 4 of PAIA.

8. PROCESSING OF PERSONAL INFORMATION

The Group processes personal information in the ordinary course of its business operations and in compliance with applicable data protection legislation, including the Protection of Personal Information Act, 2013 ("POPIA").

Further details relating to the processing of personal information by the Group, including:

- the purpose of processing;
- the categories of data subjects and personal information;
- the recipients of personal information;
- cross-border transfers of personal information; and
- information security measures

are set out in the Group's Privacy Policy, which is available online at: www.assore.com.

In terms of POPIA, data subjects have the right to request access to, correction of, or deletion of their personal information.

Such requests must be made in accordance with the procedures set out in the Group's Privacy Policy.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of this Manual is available:

- 9.1.1 on the website at: www.assore.com
- 9.1.2 at the head office for public inspection during normal business hours;
- 9.1.3 to any person upon written request to the Information Officer; and
- 9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of this Manual and for access to records may be payable in accordance with the applicable PAIA Regulations.

9.3 Further information regarding applicable fees is available at: <https://inforegulator.org.za/paia-fees-structure-2/>

10. UPDATING OF THE MANUAL

This manual will be reviewed and, where necessary, updated on a periodic basis to ensure continued compliance with PAIA, POPIA, and any other applicable legislation.

Updates may be made to reflect changes in the Company's operations, organisational structure, or legal and regulatory requirements.

Annexure A – List of Subsidiaries

Company Name	Registration Number
African Mining and Trust Company Ltd	1931/003633/06
Assore Treasury Company (RF) (Pty) Ltd	2019/618778/07
Erven 27 & 28 Illovo (Pty) Ltd	2001/000388/07
Assore Communities SPV (Main Street 904)	2011/008937/07
Ore & Metal Company Ltd	1930/002363/06
Assore Employees SPV Proprietary Limited	2020/467150/07
Assore South Africa (previously Assore Ltd)	1950/037394/07
Erf 1263 Parkview Extension 1 (Pty) Ltd	2005/024880/07
Oresteel Investments (Pty) Ltd	1975/003008/07
Assore SA Propco	2024/574252/07
Assore Trust Investments Company	2022/770582/07
Erven 40 & 41 Illovo (Pty) Ltd	1999/025517/07
The Travel Department (Pty) Ltd	2022/823132/07
Dwarsrivier Chrome Mine Proprietary Limited	2011/105280/07
Wonderstone Limited	1935/006371/06