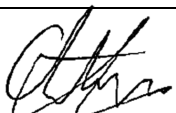




NKWE PLATINUM GROUP

PAIA

MANUAL

APPROVAL SIGNATURE RECORD				
#	NAME AND SURNAME	ROLE	SIGNATURE	DATE
1.	Claire Rutenberg	Manual Originator & Administrator		2026/03/30
2.	Vikesh Dhanooklal	Manual Reviewer		2026-03-30
3.	Hongzhang (Leon) Yang	Manual Approver		2026-04-02
4.				
5.				

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended).

Document number	Revision number	Effective date
POL-RCM-002	000	March 2026

## TABLE OF CONTENTS

<b>1. PURPOSE AND SCOPE.....</b>	<b>3</b>
<b>1.1 PURPOSE .....</b>	<b>3</b>
<b>1.2 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF NKWE PLATINUM LIMITED.....</b>	<b>3</b>
<b>2. DESCRIPTION OF REVIEW / REVISION.....</b>	<b>5</b>
<b>3. TERMS, ABBREVIATIONS AND DEFINITIONS.....</b>	<b>5</b>
<b>4. REGULATORY ASPECTS .....</b>	<b>6</b>
<b>5. GUIDE ON HOW TO USE PAIA &amp; HOW TO OBTAIN ACCESS TO THE GUIDE</b>	<b>6</b>
<b>6. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.....</b>	<b>8</b>
<b>7. DESCRIPTION OF THE RECORDS OF COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION.....</b>	<b>10</b>
<b>8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS &amp; CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY.....</b>	<b>12</b>
<b>9. PROCESSING OF PERSONAL INFORMATION .....</b>	<b>16</b>
<b>9.1 Purpose of Processing Personal Information .....</b>	<b>16</b>
<b>9.2 Description of the categories of Data Subjects &amp; of the information or categories of information relating thereto .....</b>	<b>16</b>
<b>9.3 The recipients or categories of recipients to whom the personal information may be supplied .....</b>	<b>19</b>
<b>9.4 Planned transborder flows of personal information.....</b>	<b>21</b>
<b>9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity &amp; availability of the information</b>	<b>21</b>
<b>10. BUSINESS PROCESS ASPECTS.....</b>	<b>23</b>
<b>11. UPDATING OF THE MANUAL .....</b>	<b>23</b>

# 1. PURPOSE AND SCOPE

## 1.1 PURPOSE

This PAIA Manual is useful for the public to-

- 1.1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.1.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 1.1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 1.1.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 1.1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.1.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.1.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 1.1.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 1.2 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF NKWE PLATINUM LIMITED

### 1.2.1 Chief Information Officer

Name: Hongzhang Yang  
Tel: 010 591 3989  
Email: [lyang@zijinplatinum.co.za](mailto:lyang@zijinplatinum.co.za)

**1.2.2 Deputy Information Officer** *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Claire Rutenberg  
Tel: 010 591 3989  
Email: [crutenberg@zijinplatinum.co.za](mailto:crutenberg@zijinplatinum.co.za)

**1.2.3 Access to information general contacts**

Email: [crutenberg@zijinplatinum.co.za](mailto:crutenberg@zijinplatinum.co.za)

**1.2.4 National or Head Office**

Postal Address: PostNet Suite #316  
Private Bag X29  
Gallo Manor  
2052  
Physical Address: Woodlands Office Park  
2nd Floor, Building 18  
20 Woodlands Drive  
Woodlands  
Sandton  
2191  
Telephone: 010 591 3989  
Email: [crutenberg@zijinplatinum.co.za](mailto:crutenberg@zijinplatinum.co.za)  
Website: [www.nkweplatinum.com](http://www.nkweplatinum.com)

## 2. DESCRIPTION OF REVIEW / REVISION

REV.NO.	PAGE	DETAILS	EFFECTIVE DATE	REVIEWED BY

## 3. TERMS, ABBREVIATIONS AND DEFINITIONS

TERM / ABBREVIATION	DEFINITION
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000
POPIA	Protection of Personal Information Act No.4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa

## 4. REGULATORY ASPECTS

We base our actions on compliance with the laws, rules, and regulations. The Code is based on the cardinal idea of legal compliance, both in letter and in spirit. All individuals must respect and obey the laws of South Africa and avoid even the appearance of impropriety.

This manual and all supporting documentation must be in line with the following acts:

- Promotion of Access to Information Act No. 2 of 2000
- Protection of Personal Information Act No.4 of 2013

## 5. GUIDE ON HOW TO USE PAIA & HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1** The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 5.2** The Guide is available in each of the official languages and in braille.
- 5.3** The aforesaid Guide contains the description of-
- 5.2.1** the objects of PAIA and POPIA;
  - 5.2.2** the postal and street address, phone and fax number and, if available, electronic mail address of-
    - 5.2.2.1** the Information Officer of every public body, and
    - 5.2.2.2** every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 5.2.3** the manner and form of a request for-

---

<sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

- 5.2.3.1** access to a record of a public body contemplated in section 11<sup>3</sup>; and
- 5.2.3.2** access to a record of a private body contemplated in section 50<sup>4</sup>;
- 5.2.4** the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.2.5** the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.2.6** all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
  - 5.2.6.1** an internal appeal;
  - 5.2.6.2** a complaint to the Regulator; and
  - 5.2.6.3** an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 5.2.7** the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.2.8** the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

---

<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

- 5.2.9** the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
  - 5.2.10** the regulations made in terms of section 92<sup>11</sup>.
- 5.4** Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.5** The Guide can also be obtained-
- 5.5.1** upon request to the Information Officer;
  - 5.5.2** from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 5.6** A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
- 5.6.1** English; and
  - 5.6.2** iSepedi

## **6. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

In terms of Section 52 of the Promotion of Access to Information Act 2 of 2000 (PAIA), the following categories of records are automatically available from Nkwe Platinum Limited without a person having to request access in terms of the Act:

<b>CATEGORY</b>	<b>TYPES OF INFORMATION</b>	<b>AVAILABLE ON WEBSITE</b>	<b>AVAILABLE ON REQUEST</b>
<b>Company Information</b>	Company registration documents		✓
	Company profile	✓	

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- a) any matter which is required or permitted by this Act to be prescribed;
- b) any matter relating to the fees contemplated in sections 22 and 54;
- c) any notice required by this Act;
- d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

CATEGORY	TYPES OF INFORMATION	AVAILABLE ON WEBSITE	AVAILABLE ON REQUEST
	Office locations & contact details	✓	
	Business hours		✓
	Company organogram (general structure)		✓
	B-BBEE certificate		✓
	Mission & vision statements		✓
	Accreditation documentation	✓	✓
<b>Public Affairs</b>	Public product information		✓
	Media releases		✓
<b>Marketing</b>	Market information		✓
	Product brochures		✓
	Client testimonials (with permission)		✓
<b>Leadership &amp; Staff</b>	Staff profiles	✓	✓
	Email addresses	✓	✓
	Contact information	✓	✓
<b>Services Information</b>	Description of services offered	✓	
	Newsletters & publications		✓
<b>Governance Documents</b>	PAIA Manual	✓	✓
	Privacy Policy	✓	✓
	Terms & Conditions of service		✓
	Complaints procedure		✓
	General policies & procedures applicable to clients		✓
	POPIA compliance documentation	✓	✓
	Ethics policy		✓
<b>Labour Law Information</b>	General information booklets on labour law		✓
	Labour law updates and newsletters		✓
	Statutory updates and summaries		✓
<b>HR Information</b>	Employment opportunities / vacancies	✓	
<b>Events &amp; Training</b>	Calendar of upcoming events / workshops	✓	✓

CATEGORY	TYPES OF INFORMATION	AVAILABLE ON WEBSITE	AVAILABLE ON REQUEST
<b>News &amp; Media</b>	Press releases		✓
	Media statements		✓
	Articles & publications by company representatives		✓
<b>Regulatory Information</b>	Industry codes of conduct		✓
	Membership of professional bodies		✓
	Certifications & accreditations		✓
	Compliance certificates		✓
	Professional registrations		✓
<b>Financial Information</b>	Banking details for payment purposes		✓
<b>e-Library</b>	Reference materials and resources		✓
<b>Social Media Platforms</b>	Content posts & engagement	✓	✓
<b>Website Information</b>	Any other information contained on the website from time to time	✓	✓

## 7. DESCRIPTION OF THE RECORDS OF COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

The following records are available in accordance with legislation other than the Promotion of Access to Information Act (PAIA). These records may be accessed by the relevant persons or entities as specified in each applicable legislation:

CATEGORY	TYPES OF INFORMATION
<b>Basic Conditions of Employment Act</b>	Employment contracts Remuneration records Leave records Working hours
<b>Labour Relations Act</b>	Disciplinary records Employee grievances Compliance posters
<b>Occupational Health &amp; Safety Act and Mine Health &amp; Safety Act</b>	Health and safety committee records Incident and Inspector reports Health and safety policies Legal appointments Entry, exit and progress medicals, fitness to work.

<b>CATEGORY</b>	<b>TYPES OF INFORMATION</b>
<b>Skills Development Act</b>	Workplace skills plan Annual training reports Learning programme records Skills development levies Mandatory and Discretionary grant records Skills development forum records Statutory requirement records Mining Qualifications and Authority (MQA Seta) records Quality Council of Trades and Occupations (QCTO) National Qualifications Framework – (NQF) records
<b>Unemployment Insurance Act</b>	Employee UIF registration UIF payment records UIF returns
<b>Compensation for Occupational Injuries &amp; Diseases Act</b>	Work-related injury reports COIDA registration Accident records, investigations and outcomes
<b>Income Tax Act</b>	PAYE records Employee tax information Tax clearance certificates
<b>Value Added Tax Act</b>	VAT registration VAT returns VAT payment records
<b>Companies Act</b>	Memorandum of Incorporation Share register Directors' information Annual returns Company secretarial records
<b>Broad-Based Black Economic Empowerment Act</b>	B-BBEE certificate B-BBEE verification information Ownership information Skills development records Mining Charter report Local Economic Development records Employment Equity Records
<b>National Credit Act</b>	Credit agreements (if applicable) Credit assessment records
<b>Consumer Protection Act</b>	Services and products information Customer agreements Services and products return and refund policies
<b>Electronic Communications &amp; Transactions Act</b>	Electronic communications policies Website terms and conditions Privacy policy Human resources Information systems

CATEGORY	TYPES OF INFORMATION
<b>Protection of Personal Information Act</b>	POPIA compliance framework Processing records Data subject access requests Consent records Privacy notices
<b>Financial Intelligence Centre Act</b>	Client verification records Suspicious transaction reports
<b>Promotion of Access to Information Act</b>	PAIA manual PAIA request records
<b>Mine Health &amp; Safety Act and Mining Charter</b>	SHE (Safety, Health and Environment) Assessment Records SHE Audit Reports Sustainable development records Medical records of all employees and contractors Environmental Approvals Risk assessments
<b>National Environmental Management Act and Environmental Impact Assessment Regulations</b>	Environmental Authorisation Approved EMPr Audit Reports Compliance Monitoring Reports

## 8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS & CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY

The following table outlines the subjects on which our company holds records and the categories of records held on each subject:

SUBJECT	CATEGORIES OF RECORDS
<b>Chief Executive Officer</b>	Administration Records
<b>Strategic Documents, Plans, Proposals</b>	Annual Reports Strategic Plan Business plans Corporate social responsibility initiatives
<b>Finance &amp; Accounting</b>	Annual financial statements Management accounts Banking records Supplier invoices & statements Tax returns & assessments Asset register Debtors & creditors information Insurance policies & claims

SUBJECT	CATEGORIES OF RECORDS
	Audit reports Financial policies & procedures Investment records Accounting Records & Consolidation Records General Correspondence Treasury Dealing & Settlement Records Contracts & Agreements VAT Records PAYE Records TAX Records
<b>Payroll</b>	Employee IDs Payroll reports Payslips Salary information Statutory returns Tax certificates Benefit deductions Leave pay records Contracts & Agreements VAT Records PAYE Records TAX Records
<b>Human Resources</b>	HR policies & procedures Employee personal information Employment contracts Personnel files Leave records Remuneration & benefits information Training records Disciplinary records BBBEE records Workplace skills plans Health & safety records Recruitment & selection records Pension records Statutory Records Employee developmental records Transformation compliance records Quality Council for Trades & Occupations (QCTO) National Qualifications Framework Act – (NQF)
<b>Marketing &amp; Supplier Information</b>	Supplier information for invoicing purposes Marketing materials & brochures Advertising records Media releases Corporate communications Market research

<b>SUBJECT</b>	<b>CATEGORIES OF RECORDS</b>
	Brand management records Social media content & reports Event management records Supplier & community relationship management records
<b>Registrations &amp; Accreditations</b>	MQA (Mining Qualifications Authority) B-BBEE documents & certificates Professional body memberships Accreditation certificates Quality assurance documentation Industry-specific certifications Continuing professional development records Employer associations Permits, licences & authorisations related to agriculture & conservation
<b>Corporate Governance</b>	Memorandum of Incorporation Company rules & by-laws Company policies & procedures Directors' records Equity structure details Manual of records Statutory compliance records
<b>Operations &amp; Administration</b>	Operational policies & procedures Quality management records Service delivery records Project documentation Business processes Standard operating procedures Supply chain documentation Administrative forms & templates Office management records
<b>Information Technology</b>	System backups Security systems & records IT policies & procedures IT asset register System documentation User manuals & training materials Software licenses Network diagrams Data backup & disaster recovery records Website information
<b>Legal &amp; Compliance</b>	Contracts & agreements Litigation records Legal opinions Regulatory submissions & correspondence

<b>SUBJECT</b>	<b>CATEGORIES OF RECORDS</b>
	Compliance reports Statutory records Intellectual property records Code of conduct
<b>Procurement &amp; Supplier Data</b>	Supplier information & records Supplier contracts & agreements Supplier reports & deliverables Supplier feedback & satisfaction surveys Supplier billing & payment records Supplier consultation records BBBEE Certificates Accreditation documents Tender documentation
<b>Labour Law &amp; HR Consulting</b>	Case law compilations Labour law advisory records HR consulting methodologies HR audit reports Employment relations records Internal dispute resolution procedures Training materials & methodologies Best practice documentation Occupational health & safety Quality Council for Trades & Occupations (QCTO) National Qualifications Framework Act – (NQF)
<b>Business Consulting</b>	Business consulting methodologies Strategic planning documentation Business analysis reports Process improvement records Change management documentation Business model designs Benchmarking studies Industry best practices Consulting frameworks & tools Consultation records
<b>Research &amp; Development</b>	Research records & data Development project documentation Product/service development records Feasibility studies Technical specifications Testing and evaluation records Industry analysis & reports Trend analysis Market opportunity assessments

## **9. PROCESSING OF PERSONAL INFORMATION**

### **9.1 Purpose of Processing Personal Information**

Nkwe Platinum Limited processes PI for various purposes including for –

- Engaging in various forms of direct marketing;
- Facilitating transactions with data subjects;
- Collecting data for statistical purposes to improve its services;
- Fulfilling its contractual obligations to its clients and client contacts;
- Complying with the provisions of statute and regulations;
- Attending to the legitimate interests of data subjects;
- Identifying prospects for enhanced service delivery and business sustainability
- Tracking data subject activity on the website and its links as well as their transactions with Nkwe Platinum Limited;
- Providing data subject information to Nkwe Platinum Limited suppliers, in order for Nkwe Platinum Limited suppliers to use the information to market their services to data subjects who are current suppliers and/ or who have consented as envisaged in the POPI Act. These suppliers who are recipients of PI are business organisations who are permitted to use the information only for lawful engagement;
- Confirm and verify data subject identity or to verify that they are authorised users for security purposes;
- Conduct market or customer satisfaction research;
- Audit and record keeping purposes;
- In connection with legal proceedings.

### **9.2 Description of the categories of Data Subjects & of the information or categories of information relating thereto**

In accordance with the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA), Nkwe Platinum Limited processes personal information relating to the following categories of data subjects:

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION PROCESSED
<b>Suppliers &amp; Service Providers</b>	Company/entity name & registration details Contact details of representatives B-BBEE status & certificates Banking details Tax information & VAT numbers Contractual agreements & terms Compliance documentation Correspondence records
<b>Suppliers - Current</b>	Full names & contact details Identity/registration numbers Financial information (banking details, payment history) Tax information & VAT numbers Service/product preferences & history Correspondence records Contract details & service level agreements Company registration information Meeting & consultation notes Supplier feedback & satisfaction information BBBEE Certificate
<b>Supplier - Prospective</b>	Full names & contact details Business information & industry Service requirements & preferences Meeting & consultation notes Proposal details Marketing communication consent
<b>Employees - Current</b>	Full names & contact details Identity numbers & demographic information Educational qualifications & professional certifications Employment history & references Employment contracts & job descriptions Salary & benefits information Banking details Tax information Disciplinary records Leave records Training & development records Medical information (including disability information) Biometric information (if applicable) Next of kin & emergency contact details Payroll records – Human Resources Information Systems
<b>Employees - Former</b>	Full names & contact details Employment history & positions held Remuneration history Reason for termination of employment Retirement or resignation information

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION PROCESSED
<b>Job Applicants</b>	Full names & contact details Identity numbers Educational qualifications & certifications Employment history & references Curriculum vitae & application information Background check information Recruitment documentation
<b>Directors &amp; Shareholders</b>	Full names & contact details Identity numbers/passport details Shareholding information Directorship details Banking details for dividend payments Tax information Meeting attendance records Voting records
<b>Business Partners</b>	Full names & contact details Identity/registration numbers Partnership agreements Supplier database, data & records
<b>Visitors to Premises</b>	Full names Identity or passport numbers Contact details Vehicle registration (if applicable) Surveillance records (CCTV footage) Time & date of visits Purpose of visit
<b>Website Users &amp; Online Visitors</b>	IP addresses Browser type & version Operating system information Pages visited & navigation patterns Time spent on website Referring websites Contact information submitted through web forms Subscription preferences Vacancy portal on website (see Job Applicants)
<b>Training Participants</b>	Full names & contact details Identity numbers Employment information Educational background Course registrations & completions Assessment results & certifications Attendance records Payment information Feedback on training

<b>CATEGORIES OF DATA SUBJECTS</b>	<b>PERSONAL INFORMATION PROCESSED</b>
<b>Consultants &amp; Independent Contractors</b>	Full names & contact details Identity/registration numbers Professional qualifications & certifications Service agreements & scope of work Performance evaluations Banking details Tax information Correspondence records

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

In accordance with Section 51(1)(c)(ii) of the Promotion of Access to Information Act and the Protection of Personal Information Act, Nkwe Platinum Limited may supply personal information to the following recipients or categories of recipients:

<b>CATEGORY OF PERSONAL INFORMATION</b>	<b>RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED</b>
<b>Identity number &amp; names</b>	South African Police Service (for criminal checks) Department of Home Affairs (for verification) Background screening service providers – (MIE) South African Revenue Service (SARS) Financial institutions Regulatory bodies (as required by law) Human Resources Information Systems Zijin Mining Group – Head Quarters Mining Charter
<b>Qualifications</b>	South African Qualifications Authority (SAQA) Council on Higher Education (CHE) Professional bodies (industry specific) Educational institutions (for verification) Quality Council for Trades & Occupations (QCTO) National Qualifications Framework – (NQF) Human Resources Information Systems Zijin Mining Group – Head Quarters Mining Charter Mining Qualifications Authority (MQA Seta)
<b>Credit &amp; payment history</b>	Credit Bureaus Financial institutions Debt collection agencies Courts (as required by legal proceedings) Zijin Mining Group – Head Quarters

CATEGORY OF PERSONAL INFORMATION	RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED
<b>Contact information</b>	Service providers (IT, payroll, marketing, etc.) Regulatory bodies (as required by law) Government departments Insurance providers Third-party consultants (when authorized) Human Resources Information Systems Zijin Mining Group – Head Quarters
<b>Employment history &amp; records</b>	Department of Employment and Labour Unemployment Insurance Fund (UIF) Compensation Fund Recruitment agencies (with consent) Verification agencies Future employers (with consent for references) Human Resources Information Systems Zijin Mining Group – Head Quarters
<b>Banking details</b>	Banking institutions Payroll service providers / Human Resources Information Systems South African Revenue Service (SARS) Auditors Legal representatives (when authorized) Supplier Banking information – Zijin Mining Group
<b>Healthcare information</b>	Medical aid schemes Insurance providers Occupational health practitioners Wellness program providers Employee benefits administrators Medical practitioners Human Resources Information Systems Zijin Mining Group- Head Quarters
<b>B-BBEE information</b>	B-BBEE verification agencies Department of Trade, Industry and Competition Clients (for tender & procurement purposes) Sector Education & Training Authorities (SETAs) Mining Charter Zijin Mining Group - Head Quarters Quality Council for Trades & Occupations (QCTO) National Qualifications Framework Act – (NQF)
<b>Tax information</b>	South African Revenue Service (SARS) Tax consultants & auditors Financial institutions Payroll administrators / Human Resources Information Systems Zijin Mining Group – Head Quarters

<b>CATEGORY OF PERSONAL INFORMATION</b>	<b>RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED</b>
<b>Corporate information</b>	Companies & Intellectual Property Commission (CIPC) Industry regulatory bodies Government departments Business partners (as authorized) Service providers (legal, accounting, etc.) Mining Charter Human Resources Information Systems Zijin Mining Group – Head Quarters
<b>Training records</b>	Mining Qualifications & Authority (MQA) South African Board for People Practices (SABPP) Professional bodies Department of Higher Education & Training Quality assurance bodies Mining Charter Human Resources Information Systems Zijin Mining Group- Head Quarters
<b>Legal proceedings information</b>	Courts and tribunals Legal representatives Commission for Conciliation, Mediation & Arbitration (CCMA) Regulatory authorities Opposing parties in litigation (through legal process) Human Resources Information Systems Zijin Mining Group- Head Quarters
<b>Website usage data</b>	IT service providers Website analytics providers Marketing service providers Cybersecurity consultants Zijin Mining Group- Mining Group

#### **9.4** Planned transborder flows of personal information

There are envisaged cross-border flows of information outside of cloud server storage in Asia.

#### **9.5** General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity & availability of the information

Nkwe Platinum Limited is legally obliged to provide adequate systems, technical and operational protection for the personal information that it holds and to prevent unauthorised access to as well as prohibited use of personal information. Nkwe Platinum Limited will therefore on a regular basis review its security controls and related processes to ensure that the personal information of data subjects remains secure.

Nkwe Platinum Limited has conducted an impact assessment across all of its functions and used the findings thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis.

Our company utilises the Microsoft 365 suite of applications, which provides enterprise-grade security features including data encryption at rest and in transit, multi-factor authentication, and advanced threat protection. Access to information is strictly controlled on a need-to-know basis through role-based access controls and regular user access reviews. All systems are protected by industry-standard anti-virus and anti-malware solutions that are regularly updated to address emerging threats.

Nkwe Platinum Limited's policies and procedures cover the following aspects:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

We maintain comprehensive data backup procedures to ensure business continuity and implement regular security patches and updates across all systems. Our staff receives ongoing information security awareness training to minimise human error risks. Physical security measures are in place at our premises to protect information assets, including access control systems and CCTV surveillance where appropriate.

All sensitive data transmissions occur over encrypted connections, and we implement secure configuration standards across our IT infrastructure. Remote access to company systems is secured through virtual private networks (VPNs) with strong authentication requirements. We conduct periodic security assessments and vulnerability scans to identify and address potential security weaknesses proactively.

Nkwe Platinum Limited also ensures that it contracts with Operators as required by POPIA and it requires appropriate security, privacy and confidentiality obligations of these operators in order to ensure that personal information is kept secure. The same protocols apply to any party to whom Nkwe Platinum Limited may pass personal information on to for the purposes mentioned herein.

Our information security policies and procedures are regularly reviewed and updated to address evolving threats and comply with relevant legislation, including the Protection of Personal Information Act (POPIA) and other applicable regulatory requirements.

In the event of a security breach, we have documented incident response procedures to ensure timely containment, investigation, and notification to affected parties and relevant authorities as required by law.

Note: While we implement reasonable security measures, no security system can prevent all potential security threats. We continuously monitor our systems and adjust our security measures as new threats and solutions emerge.

## **10. BUSINESS PROCESS ASPECTS**

**10.1** A copy of the Manual is available-

**10.1.1** on ([www.nkweplatinum.com](http://www.nkweplatinum.com)), if any;

**10.1.2** head office of the company for public inspection during normal business hours;

**10.1.3** to any person upon request and upon the payment of a reasonable prescribed fee; and

**10.1.4** to the Information Regulator upon request.

**10.2** A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## **11. UPDATING OF THE MANUAL**

The head of the company will on a regular basis update this manual.

***Issued by***

---

***Mr Leon Yang***

***Chief Executive Officer***