



RBM MINERAL RESOURCES CC

A MEMBER OF THE RBM GROUP · SOUTH AFRICA | UAE

ACCESS TO INFORMATION

PAIA Manual

Manual published in terms of section 51 of the Promotion of Access to Information Act

Published in terms of section 51 of the *Promotion of Access to Information Act 2 of 2000*, read with the *Protection of Personal Information Act 4 of 2013*.

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1. Introduction

This Manual is published by RBM Mineral Resources CC, a member of the RBM Group (the "**Company**"), in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("**PAIA**"), read with the Protection of Personal Information Act 4 of 2013 ("**POPIA**").

PAIA gives effect to the constitutional right of access to information held by the State and to information held by another person that is required for the exercise or protection of any right. This Manual tells a requester what records the Company holds, and how to ask for access to them.

The Company is a private body for the purposes of PAIA. This Manual is available free of charge on rbmgroup.co.za, at the Company's registered office during business hours, and on request by email.

2. Particulars of the Company

Name of private body	RBM Mineral Resources CC
Registration number	2008/036156/23
Group	A member of the RBM Group
Nature of business	Mining operations, mineral processing, refining coordination, and the export and distribution of minerals and precious metals
Information Officer	Rashaad Haroun Rayman, Managing Member
Postal and physical address	3rd Floor, West Tower, Nelson Mandela Square, Sandown, 2031, Gauteng, South Africa
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Email	compliance@rbmgroup.co.za
Website	rbmgroup.co.za

Requests, and any correspondence about this Manual, must be addressed to the Information Officer.

3. The Guide published by the Information Regulator

The Information Regulator has published a Guide, in terms of section 10 of PAIA, on how to use the Act. The Guide is available in each official language from the Information Regulator of South Africa, and on its website at info regulator.org.za. Any person who requires assistance in making a request should consult the Guide, or contact the Information Regulator directly.

4. Records available without a request

The following categories of record are published voluntarily and are available without a formal PAIA request, on the Company's website or on request by email:

- this Manual;
- the Company's Privacy Policy;

- the Company's Supply Chain Policy and its undertaking in respect of the OECD Due Diligence Guidance;
- the Company's Code of Ethics and Business Conduct, Anti-Bribery and Corruption Policy, and Whistleblower Policy;
- copies of the refining licence and export permit issued to the Company by the South African Diamond and Precious Metals Regulator; and
- general information about the Company's operations, history and corporate social responsibility programme.

No notice has been published under section 52(2) of PAIA in respect of categories of records automatically available.

5. Records held by the Company

The Company holds records in the following subject categories. Listing a category does not mean that every record in it will be released: access is subject to the grounds for refusal in Chapter 4 of Part 3 of PAIA.

Subject	Categories of record
Corporate and statutory	Founding statement, members' register, resolutions and minutes of meetings, statutory returns
Licensing and regulatory	Refining licence, export permits, mining permits, correspondence with regulators, inspection and audit records
Financial	Annual financial statements, management accounts, tax returns and assessments, banking records, invoices and settlement records
Commercial	Client and supplier contracts, off-take and joint venture agreements, pricing records, transaction and chain-of-custody records
Compliance	Risk Management and Compliance Programme, client due diligence files, screening records, reports submitted to the Financial Intelligence Centre, training records
Employment	Recruitment records, contracts of employment, payroll and tax records, disciplinary and grievance records, training and competency records
Health, safety and environment	Risk assessments, incident and investigation reports, statutory appointments, environmental authorisations and monitoring data
Operations and technical	Production and processing records, plant and equipment records, assay and analytical results
Information technology	System and access records, security logs, service provider agreements

6. Records held in terms of other legislation

The Company holds records in terms of, among others, the Companies Act 71 of 2008, the Income Tax Act 58 of 1962, the Value-Added Tax Act 89 of 1991, the Tax Administration Act 28 of 2011, the Financial Intelligence Centre Act 38 of 2001, the Precious Metals Act 37 of 2005, the Diamonds Act 56 of 1986, the Mineral and Petroleum Resources Development Act 28 of 2002, the Mine Health and

Safety Act 29 of 1996, the National Environmental Management Act 107 of 1998, the Basic Conditions of Employment Act 75 of 1997, the Labour Relations Act 66 of 1995, the Occupational Health and Safety Act 85 of 1993, the Compensation for Occupational Injuries and Diseases Act 130 of 1993, the Unemployment Insurance Act 63 of 2001, the Skills Development Act 97 of 1998, and POPIA.

Access to a record held in terms of other legislation is not automatic and remains subject to PAIA.

7. How to request access

7.1 Making a request

A request must be made on the prescribed form, being Form 2 of the Regulations published under PAIA, and delivered to the Information Officer at the address in Section 2. The form is available from the Information Regulator's website and from the Company on request.

The requester must:

- provide sufficient particulars to enable the Information Officer to identify the record and to identify the requester;
- state the form of access required and, if applicable, the manner in which the requester wishes to be informed of the decision;
- identify the right that the requester is seeking to exercise or protect, and explain why the record is required for that purpose; and
- where the request is made on behalf of another person, submit proof of the capacity in which the requester is acting.

7.2 Fees

Two fees apply, as prescribed in the Regulations published under PAIA and as amended from time to time:

- **A request fee** — payable by every requester other than a personal requester seeking their own personal information, before the request is processed.
- **An access fee** — payable before access is given, calculated according to the prescribed tariff for reproduction, search and preparation time, and postage.

The Information Officer will notify the requester of the amount payable and may require a deposit where search and preparation are estimated to exceed the prescribed period. Current prescribed amounts are published by the Information Regulator and are available from the Information Officer on request.

7.3 Decision and time periods

The Information Officer will decide the request and notify the requester in writing within 30 days of receipt. That period may be extended by a further 30 days where the request is for a large number of records, or requires a search of records held at another location, and the requester will be notified of any extension and the reasons for it.

If the request is granted, the notice will state the access fee payable, the form in which access will be given, and the requester's right to lodge an application with a court against the fee or the form

of access. If the request is refused, the notice will state adequate reasons, the provisions of PAIA relied upon, and the requester's right to lodge an application with a court.

7.4 Grounds for refusal

The Information Officer must or may refuse access in the circumstances set out in Chapter 4 of Part 3 of PAIA, including where disclosure would involve:

- the unreasonable disclosure of personal information about a third party;
- the disclosure of commercial information of the Company or of a third party, including trade secrets, financial or commercial information the disclosure of which would harm commercial or financial interests, or information supplied in confidence the disclosure of which could put a party at a disadvantage in contractual or other negotiations;
- a breach of a duty of confidence owed to a third party;
- prejudice to the safety of individuals or the protection of property;
- the disclosure of records privileged from production in legal proceedings; or
- the disclosure of research information of the Company or a third party where disclosure would expose the researcher or the subject matter to serious disadvantage.

Where a record contains information that may be refused together with information that may not, access will be given to the severable part that may be disclosed.

7.5 Remedies

There is no internal appeal against a decision of the Information Officer of a private body. A requester who is dissatisfied may lodge a complaint with the Information Regulator, or apply to a court for appropriate relief, within the periods provided in PAIA.

8. Processing of personal information

The Company processes personal information in accordance with POPIA. The categories of data subject, the categories of personal information processed, the purposes of processing, the recipients to whom information may be supplied, planned cross-border transfers, and the security measures applied, are set out in the Company's Privacy Policy, which forms part of this Manual and is published alongside it.

A data subject may request access to, or correction or deletion of, their personal information using the process in Section 7, and may object to processing. Complaints may be made to the Information Regulator.

9. Availability and updating of this Manual

This Manual is available in English, free of charge, on rbmgroupp.co.za, at the Company's registered office during business hours, and by email from the Information Officer. A copy has been submitted to the Information Regulator.

This Manual is reviewed by the Information Officer at least annually, and updated whenever there is a material change to the Company's structure, functions or records. The version history is recorded in the document control table on the cover page.

Approval

Approved by the Managing Member of RBM Mineral Resources CC on 20 August 2026, with effect from that date.

Signature  R H Rayman — Managing Member for and on behalf of RBM Mineral Resources CC	Date 20 August 2026 Effective from
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