COPPER 360 LIMITED

(REGISTRATION NUMBER: 2021/609755/06) AND SUBSIDIARY COMPANIES AND/OR THE COMPANIES THAT FORM PART OF THE COPPER 360 GROUP OF COMPANIES

("The Company" or "Copper 360")

THE PROMOTION OF ACCESS TO INFORMATION MANUAL

("PAIA Manual")

Published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

July 2025

Version 2

A copy of the manual will be available for inspection at the Head Office of Copper 360 and is available on the Company website at www.copper360.co.za

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1. PREAMBLE

The Constitution of the Republic of South Africa provides for a statutory right of access, on request, to any information held by the state or by private bodies, where such information is required for the exercise or protection of any right. The Promotion of Access to Information Act, 2 of 2000 (**"PAIA"**) came into effect on 9 March 2001 in order to give effect to this Constitutional right. Where a request is made in terms of PAIA that private body must disclose the requested information if the requester is able to show that the record of information is required for the exercise or protection of any rights, provided that no grounds of refusal contained in PAIA are applicable. The requested must comply with all the procedural requirements as set out in PAIA.

In terms of Section 51 of PAIA, private bodies are obligated to compile a manual that will enable a person to obtain access to certain information held by such private bodies. The Copper 360 PAIA Manual (**"the Manual"**) is compiled in accordance with section 51 of PAIA while also giving effect to the Protection of Personal Information Act, 4 of 2013 (**"POPIA"**). POPIA gives effect to everyone's Constitutional right to privacy and promotes the protection of personal information processed by public and private bodies.

2. CONTACT DETAILS OF COPPER 360's INFORMATION OFFICER

The Chief Executive Officer of Copper 360 has delegated his powers and responsibilities to the Information Officer below to handle all requests on Copper 360's behalf and ensure that the requirements of PAIA are administered in a fair, objective and impartial manner.

Name of Private Body:	Copper 360 Limited
Designated Information Officer:	Emile Nieuwenhuizen
Email address:	legal@copper360.co.za
Tel:	082 846 5852
Physical address:	1 Main Road, Nababeep, Namaqualand, Northern Cape, 8265
Postal address:	1 Main Road, Nababeep, Namaqualand, Northern Cape, 8265

3. AVAILABILITY OF COPPER 360's PAIA MANUAL

The Manual is applicable to Copper 360, subsidiary companies and/or the companies that form part of the Copper 360 Group of companies. A list of subsidiaries and companies forming part of the Copper 360 Group of companies will be made available on request.

A copy of this Manual is available to the public on the website of Copper 360 at https://copper360.co.za/ , or at the head office of Copper 360 for inspection during normal business hours, or on request from the Information Officer and subject to the payment of the prescribed fee provided in this Manual. The Information Officer of Copper 360 shall review

this Manual, from time to time, and update it as and when he/she deems it necessary.

4. WHO MAY REQUEST ACCESS TO INFORMATION

PAIA states that a request for information may only be made, by a person, if the information is required for the exercise or protection of a right.

Information will not be provided unless a person seeking such information provides sufficient details, which will enable Copper 360 to identify the right that the requester is seeking to protect. The person seeking access to information must also provide an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance.

The Information Officer has been delegated with the task of receiving and co-ordinating all requests aimed at gaining access to records in terms of PAIA. The Information Officer will facilitate the liaison with the Legal department of Copper 360 on all these requests to ensure proper compliance with PAIA and POPIA.

All requests, in terms of PAIA and this Manual, must be addressed to the Information Officer using the details in paragraph 2 above. Requests sent to any party who is not the Information Officer may not be dealt with timeously.

Copper 360 will attempt protect the confidentiality of information provided to it by third parties, subject to Copper 360's obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information. If access is requested to a record that contains information about a third party, Copper 360 must first attempt to contact this third party to inform them of the request. This provides the third party with the opportunity of responding, by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party does furnish reasons for the support or denial of access, the Information Officer will consider these reasons when making his/her decision.

5. INFORMATION REGULATORS GUIDE

The Information Regulator (established in terms of POPIA and PAIA) has compiled and published an official guide (**"the Guide"**) that may be used by a person who wishes to exercise any right in terms of PAIA and POPIA.

Copies of the Guide are available on the website of the Information Regulator at https://inforegulator.org.za/training/wp/paia-guidelines/ . A copy of the Guide may be requested from the Information Officer in accordance with Form 1 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to **Form 1 Found on the Information Regulator's website at:**

https://inforegulator.org.za/paia-forms/.

A copy of the Guide is available, for public inspection during normal office hours at our physical address.

6. INFORMATION THAT IS AUTOMATICALLY AVAILABLE TO THE PUBLIC

Information that is found on the website of Copper 360 is automatically available to the public and need not be formally requested in terms of the Manual.

The following information is automatically available to the public:

- Annual Reports
- Financial Statements
- JSE Statements & Listing Information
- SENS Statements

If the above records are not available on the Copper 360 website, where a person may download the document, such person may request a copy by contacting the information officer at legal@copper360.co.za. Should a hard copy be required, payment of a fee as set out in paragraph 10.3 below is required.

7. INFORMATION AVAILABLE IN TERMS OF POPIA

Personal information shall bear the meaning as defined in POPIA. In terms of POPIA, personal information may only be processed if it is processed for a specified purpose. The purpose for which data is processed by Copper 360 will depend on the nature of the data. The purpose is ordinarily disclosed, explicitly or implicitly, at the time that the data is collected. Please refer to the Copper 360 Personal Information Protection Policy for further information.

7.1. CATEGORIES OF DATA AND PERSONAL INFORMATION COLLECTED BY COPPER 360

7.1.1. Employees:

- Name and contact details
- Identity number and identity documents including passports
- Employment history and references
- Personal Tax number
- Employee number
- Banking and financial details
- Details of payments to third parties (deductions from salary)
- Employment contracts
- Employment equity plans
- Medical aid records
- Pension fund records
- Remuneration/salary records

- Performance appraisals
- Disciplinary records
- Leave records
- Training records
- Qualifications and licences
- Parental status
- Biometrics
- Medical records
- Marital status
- Disability status
- Criminal records

7.1.2. Consumers and prospective consumers (which may include employees):

- Postal and/or street address
- Title and name
- Contact numbers and/or e-mail address
- Ethnic group
- Employment history
- Age
- Gender
- Marital status
- Nationality
- Language
- Financial information
- Identity or passport number
- Browsing habits and click patterns on Copper 360 group websites.

7.1.3. Vendors/suppliers/other businesses:

- Name and contact details.
- Identity and/or company information and directors' information.
- Banking and financial information.
- Information about products or services.
- Other information not specified, reasonably required to be processed for business operations.

7.2. THE PURPOSE OF PROCESSING PERSONAL INFORMATION

7.2.1. For Consumers:

- Performing duties in terms of any agreement with consumers.
- Make, or assist in making, credit decisions about consumers.
- Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with the Copper 360 Group.

- Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about Copper 360 Group's products and services, unless consumers indicate otherwise.
- To form a view of consumers as individuals and to identify, develop or improve products, which may be of interest to consumers.
- Carrying out market research, business and statistical analysis.
- Performing other administrative and operational purposes including the testing of systems.
- Recovering any debt consumers may owe the Copper 360 Group.
- Complying with the Copper 360 Group's regulatory and other obligations.
- Any other reasonably required purpose relating to the Copper 360 Group business.

7.2.2. For prospective consumers:

- Verifying and updating information.
- Pre-scoring.
- Direct marketing.
- Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Copper 360 Group's business.

7.2.3. For Employees:

- The same purposes as for consumers (above).
- Verification of applicant employees' information during recruitment process and/or promotions and/or movement.

7.2.4. General Matters relating to employees:

- Pension/Provident
- Funeral
- Third parties (including but not limited to SARS, Trade Unions, Department of Labour and the Mining Qualifications Authority)
- Medical aid
- Payroll
- Disciplinary action
- Training
- Any other reasonably required purpose relating to the employment or possible employment relationship.

7.2.5. For vendors/suppliers/other businesses:

- Verifying information and performing checks
- Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties
- Payment of invoices
- Complying with the Copper 360 Group's regulatory and other obligations

- Any other reasonably required purpose relating to the Copper 360 Group's business.

7.3. THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

- Any firm, organisation or person that the Copper 360 Group uses to collect payments and recover debts or to provide a service on its behalf;
- Any firm, organisation or person that/who provides the Copper 360 Group with products or services;
- Any person who the Copper 360 Group has reason to believe to be a data subject's/consumer's parent, carer or helper where he/she is unable to handle his/her own affairs because of mental incapacity or other similar issues;
- Any payment system the Copper 360 Group uses;
- Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the Copper 360 Group has a duty to share information;
- Credit bureaux;
- Third parties to whom payments are made on behalf of employees;
- Financial institutions from whom payments are received on behalf of data subjects;
- Any other operator not specified;
- Employees, contractors and temporary staff; and
- Agents.

7.4. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

Copper 360 may be required, from time to time, to transfer personal information outside of South Africa to various countries. Copper 360 shall only transfer information to other countries who have privacy laws similar to South Africa's or to recipients who can guarantee the protection of personal information to the same standard which Copper 360 is required protect such personal information.

7.5. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY COPPER 360

Copper 360 has extensive information security measures in place to ensure the security, confidentiality, integrity and availability of personal information in our possession. This is supported by 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.

8. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Category of records	Applicable Legislation
Incorporation Documents, Board Resolutions, Shareholder Register, Shareholder Agreements, Minutes of Meetings, Register of Company Secretary and Auditors, Reports presented at Annual General Meetings, Annual Financial Statements, Record of Directors, SENS Releases, Share Certificates	Companies Act 71 of 2008
Employment Contracts, Medical Records, Leave Records	• Basic Conditions of Employment Act, 75 of 1997 • Employment Equity Act, 55 of 1998 • Compensation of Occupational Injuries and Diseases Act, 130 of 1993
Labour Policies, Labour Agreements, Disciplinary Records	• Labour Relations Act, 66 of 1995 • Employment Equity Act 55 of 1998
Incident Registers, Risk Assessments, Legal Appointments, Medical Records	• Occupational Health and Safety Act, 85 of 1993 • Mine Health and Safety Act, 29 of 1996 and Regulations
Learnership Agreements, Training and Development Records, Qualifications	Skills Development Act 97 of 1998
Tax Records/Returns, Audit Reports, VAT Records	Income Tax Act, 58 of 1962
Mining Rights and Prospecting Rights	Mineral and Petroleum Resources Development Act 28 of 2002
Environmental Authorisations, Audit Reports	National Environmental Management Act 107 of 1998
Water Use Licences, Audit Reports	National Water Act 36 of 1998

9. CATEGORIES OF INFORMATION AVAILABLE UPON REQUEST

Copper 360 maintains records on the categories and subject matters listed below. Please note that the recording of 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. It is important to note that an application for access to information can be refused if the application does not comply with the procedural requirements of PAIA.

Please note further that many of the records held by Copper 360 are those of third parties, such as clients and employees, and Copper 360 takes the protection of third-party confidential information extremely seriously. For further information on the grounds of refusal of access to a record please see paragraph 10.5 below. 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
Internal records The records listed pertain to Copper 360 own affairs	• Memorandum of Incorporation • Financial records • Operational records • Intellectual property • Marketing records • Internal correspondence • Service records • Statutory records • Internal policies and procedures • Minutes of meetings.
Personnel records For the purposes of this section, **"personnel"** means any person who works for or provides services to or on behalf of Copper 360 and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Copper 360. This includes partners, directors, all permanent, temporary and part-time staff.	• Any personal records provided to us by our personnel • Any records a third party has provided to us about any of their personnel • Conditions of employment and other personnel-related contractual and quasi legal records • Employment policies and procedures • Internal evaluation and disciplinary records • Other internal records and correspondence.
Legal	• Agreements • Deeds of Transfer
Other third-party records Records are kept in respect of other parties, including without limitation joint ventures and consortia to which Copper 360 is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to Copper 360.	• Personnel, client, or Copper 360 records which are held by another party as opposed to being held by Copper 360; and • Records held by Copper 360 pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided
Financial	• Business plans and budgets • Risk management • Information technology • Capital expenditure • Taxation • Accounting records • Fixed asset registers • Financial statements and management accounts • Tax records and returns • VAT records and returns • Bank statements and cheques
Immovable and moveable property	• Agreements for the lease or sale of

	properties/buildings owned by Copper 360 • Leases in respect of vehicles • Office equipment leases • Property records and leases

10. PROCEDURE TO REQUEST INFORMATION

10.1. COMPLETION OF THE PRESCRIBED FORM

Any request for access to a record in terms of PAIA must substantially correspond with Form 2 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations and should be specific in terms of the record requested. Please refer to **Form 2 found on the Information Regulator's website at https://inforegulator.org.za/paia-forms/**.

A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you. Please take note that the prescribed form must be completed in full, failure to do so will result in the process being delayed until such additional information is provided. Copper 360 will not be held liable for delays due to receipt of incomplete forms.

POPIA provides that a requester may, upon proof of identity, request Copper 360 to confirm, free of charge, all the information it holds about the requester and may request access to such information, including information about the identity of third parties who have or have had access to such information.

POPIA also provides that where the requester is required to pay a fee for services provided to him/her, Copper 360 must provide the requester with a written estimate of the payable amount before providing the service and may require that the requester pays a deposit for all or part of the fee.

Grounds for refusal of the requesters request are set out in PAIA and are discussed below.

POPIA provides that a requester may object, at any time, to the processing of personal information by Copper 360, on reasonable grounds relating to his/her situation, unless legislation provides for such processing. The requester must complete a form substantially similar to form 1 found on the Information Regulator's website at https://inforegulator.org.za/popia-forms/ and submit it to the Information Officer: by hand at the postal or physical address mentioned above, or via SMS, or via WhatsApp, or via electronic mail at the email address set out above and/or in any manner expedient to the requester.

A requester may also request that Copper 360 correct or delete personal information about

the requester that Copper 360 may have in its possession or under its 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 requester that Copper 360 is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

A requester 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 Information Officer by hand at the postal or physical address mentioned above, or via SMS, or via WhatsApp, or via electronic mail at the email address set out above and/or in any manner expedient to the requester on a form substantially similar to form 2 found on the Information Regulator's website at https://inforegulator.org.za/popia-forms/. .

10.2. PROOF OF IDENTITY

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

10.3. PAYMENT OF PRESCRIBED FEES

There are two categories of fees which are payable:

- The request fee: R140.00
- 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 A"**.

Section 54 of PAIA entitles Copper 360 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 Annexure B of Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Form 3 found on the Information Regulator's website at https://inforegulator.org.za/paia-forms/.

A deposit of one third (1/3) of the amount of the applicable access fee, is payable if Copper 360 receives a request for access to information held on a person other than the requester himself/herself and the preparation for the record will take more than six (6) hours. In the event that access is refused to the requested record, the full deposit will be refunded to the requester.

When a decision to grant a request has been taken, the record will only be disclosed once the necessary fees have been paid in full.

10.4. TIMELINES FOR CONSIDERATION OF A REQUEST FOR ACCESS

Requests will be processed within 30 (thirty) days unless the request contains considerations

that are of such a nature that an extension of the time limit is needed.

The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Form 3 found on the Information Regulator's website at https://inforegulator.org.za/paia-forms/.

Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

10.5. RECORDS THAT CAN NOT BE FOUND OR DO NOT EXIST

If Copper 360 has searched for a record and it is believed that the record either does not exist or cannot be found within the original thirty (30) day period and the extension period, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

10.6. GROUNDS FOR REFUSAL OF ACCESS AND PROTECTION OF INFORMATION

There are various grounds upon which a request for access to a record may be refused. These grounds include:

- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
- the protection of commercial information of a third party (for example trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- if the record was produced during legal proceedings unless that legal privilege has been waived;
- if the record contains trade secrets, financial or sensitive information or any information that would put Copper 360 (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by Copper 360.

Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its

disclosure.

If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record.

11. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

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

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 within one hundred and eighty (180) days, as stipulated in section 78 of PAIA, to take the matter further.

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.

Issued by

Emile Nieuwenhuizen
Information Officer

ANNEXURE A

FEES IN RESPECT OF PRIVATE BODIES

ITEM	DESCRIPTION	AMOUNT
1.	The request fee payable by every requester	R140.00
2.	Photocopy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by the requestor) (ii) Compact disc • If provided by the requestor • If provided to the requestor	 R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotations from the service provider.
6.	Copy of visual images	Service to be outsourced. Will depend on quotations from the service provider.
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (i) Flash drive (to be provided by the requestor) (ii) Compact disc • If provided by the requestor • If provided to the requestor	 R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If the search exceeds 6 hours	One-third of the amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail, or any other electronic transfer	Actual expense, if any.