

INFORMATION MANUAL OF

IMPALA PLATINUM HOLDINGS LIMITED ("Implats")

and the following subsidiary companies:

Barplats Holdings (Pty) Limited
Barplats Investments Limited
Barplats Mines (North West) (Pty) Limited
Barplats Mines Limited
Conexco (Pty) Limited
Gazelle Platinum Limited
Impala Holdings Limited
Impala Platinum (Zimbabwe) (Pty) Limited
Impala Platinum Investments (Pty) Limited
Impala Platinum Limited
Impala Platinum Properties (Johannesburg) (Pty) Limited
Impala Platinum Properties (North West) (Pty) Limited
Impala Platinum Properties (Rustenburg) (Pty) Limited
Impala Refining Services Limited
Implats Services (Pty) Limited
Marula Platinum (Pty) Limited
Platexco (South Africa) (Pty) Limited
Rhodium Reefs Limited
Septre Mining Company (Pty)
Trojan Mineral Holdings (Pty) Limited

(collectively referred to as "the Implats group of companies")

Prepared in accordance with section 51 of
The Promotion of Access to Information Act,
Number 2 of 2000 ("the Act")

SECTION A : TABLE OF CONTENTS OF THIS SECTION 51 MANUAL

1. Contact details and the person to whom requests, pursuant to the provisions of the Act, should be made
2. The section 10 guide on how to use the Act
3. Access to records held:
 - 3.1 the latest notice regarding the categories of records which are available without access having to be requested in terms of section 52(2) of the Act
 - 3.2 records available in accordance with legislation
 - 3.3 records that may be requested in terms of section 51(1)(e) of the Act
4. Request procedure
5. Other prescribed information in terms of section 51(1)(f) of the Act
6. Availability of the manual
7. Prescribed fees
8. Prescribed forms

SECTION B :

1. Contact details and the person to whom requests, pursuant to the provisions of the Act, should be made (section 51(1)(a) of the Act):

The Information Officer, Implats group of companies

Postal address : P O Box 61386, Marshalltown 2107
Street address : 3rd Floor, Old Trafford 4, Isle of Houghton
Boundary Road, Houghton 2198
Business phone : +27 11 481 3933
Business fax : +27 11 484 0254
email address : alice.lourens@implats.co.za

2. The Section 10 guide on how to use the Act (section 51(1)(b) of the Act):

In terms of Section 10 of the Act, the South African Human Rights Commission ("SAHRC") is required to compile a guide containing information which a person intending to use the Act would require. Such guide must be made available in all official languages and, if necessary, must be updated every 2 years. The guide is required to be completed by 14 August 2003.

Please direct any queries regarding the guide to:

The South African Human Rights Commission
PAAIA Unit
The Research and Documentation Department

Postal address : Private Bag 2700, Houghton, 2041
Business phone : +27 11 484 8300
Business fax : +27 11 484 0582
email address : PAIA@sahrc.org.za
Website : www.sahrc.org.za

3. Access to records held (section 51(1)(c), 51(1)(d) and 51(1)(e) of the Act)

- 3.1 *The latest notice regarding the categories of records of Implats group of companies, which are available without a person having to request access in terms of section 52(2) of the Act (section 51(1)(c) of the Act)*

To date, no such notice has been published. However, the following records of the Implats group of companies are available without a person having to request access in accordance with the request procedure as set out in Section B.4 of this Information Manual.

Annual and Interim Reports
Memoranda and Articles of Association
Public Relations Brochures and Publications
Media / Press Releases

The above listed records may be informally requested from the Information Officer or the person directly responsible therefor within the Implats group of companies. Kindly note that depending on which automatically available records are requested, these may be available for inspection only or for purchase (see reproduction fees as set out in Section B.7.3 of this Information Manual) or free of charge.

- 3.2 *Records are available in terms of the following legislation, as amended from time to time (section 51(1)(d) of the Act)*

Basic Conditions of Employment Act No. 75 of 1997
Companies Act No. 61 of 1973
Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
Competition Act No. 89 of 1998
Constitution of SA Act No. 108 of 1996
Copyright Act No. 98 of 1987
Deeds Registries Act No. 47 of 1937
Employment Equity Act No. 55 of 1998
Environmental Laws Rationalisation Act No. 51 of 1997
Explosives Act No. 26 of 1956
Firearms Control Act No. 60 of 2000
Income Tax Act No. 58 of 1962
Insider Trading Act No. 135 of 1998
Labour Relations Act No. 66 of 1995)
Long-Term Insurance Act No. 52 of 1998
Marketable Securities Act No. 32 of 1948
Medical Schemes Act No. 131 of 1998
Mine Health and Safety Act No. 29 of 1996
Minerals Act No. 50 of 1991
National Environmental Management Act No. 107 of 1998
National Water Act No. 36 of 1998
Occupational Health and Safety Act No. 85 of 1993)
Patents Act No. 57 of 1987
Pension Funds Act No. 24 of 1956
Preferential Procurement Policy Framework Act of 2000
Promotion of Access to Information Act No. 2 of 2000
Promotion of Equality and Prevention of Unfair Discrimination Act No 4 of 2000
Protected Disclosures Act No. 26 of 2000
Sea Transport Documents Act No. 65 of 2000

Short-Term Insurance Act No. 53 of 1998
Skills Development Act No. 97 of 1998
Skills Development Levy Act No. 9 of 1999
South African Reserve Bank Act No. 90 of 1989
Stamp Duties Act No. 77 of 1968
Stock Exchange Control Act No. 1 of 1985
Trademarks Act No. 194 of 1993
Transfer Duty Act No. 40 of 1949
Unemployment Insurance Act No. 63 of 2001
Value Added Tax Act No. 89 of 1991

- 3.3 *Records of the Implats group of companies which are not automatically available without a request therefor in accordance with the request procedure as set out in Section B.4 of this Information Manual (subject to the restrictions and right of refusal to access as provided for in the Act):*

Corporate Affairs

Community Development

Project Information

Secretarial

Financial Statements
Minutes of Meetings
Statutory Records
Register of Members
Company Register
Company CM Forms
Company Policies and Procedures
Code of Practice
Approval Framework
General Records

Public / Investor Relations

Analyst and Media Liaison and Information
Presentations
Company Publications and Brochures

Legal

Agreements and Contracts
Competition Notifications
Mining Licences
Prospecting Permits
Environmental Management Programmes for Prospecting
Mining Leases
Mineral Leases
Applications for Mining Licences, Prospecting Permits and
Section 8 Applications
Deeds of Transfer
Cessions / Certificates of Mineral Rights

Finance

Business Plan and Budgets
Risk Management and Insurance
Information Technology
Capital Expenditure
Taxation
Accounting Records
Treasury Reports
Asset Register

Human Resources

- Remuneration
- Employee Relations
- Employment Equity Plan / Affirmative Action
- Organisational Structures
- Training and Development
- Whistle Blowing
- Medical Aid
- Provident Fund
- Social Responsibility
- Personnel Records
- Letters of Appointment and Employment Contracts

Health

- Drug Register and Prescription Records
- Admissions / Discharges (Clinic, Preferred Providers, Hospital)
- Statistics
- Patient Records
- Treatment Records
- Medical Reports
- Theatre Register
- Death Reports
- Occupational Health Records

Safety

- Safety Reports
- Incident and Accident Reports
- Data and Statistics
- Safety Inspections and Audits
- Claims and Compensation

Projects

- Data and Statistics
- Reports
- Procurement Information
- Project Specifications and Information
- Quality and Standards
- Environmental Reports and Audits

Geology

- Fall of Ground Register
- Quality Assurances
- Reports
- Mine Plans and Planning
- Surveying and Draughting
- DME Applications
- Mineral Resource and Mineral Reserve Statements
- Data and Statistics
- Exploration and Evaluation Drilling
- Geophysical Information
- Production Results
- Ore Accounting

Engineering

- Log Books
- Maintenance Records
- Standards and Specifications
- Environmental Management Plans
- Machinery and Equipment Records
- Explosives control Records

Operations

Ventilation Reports and Statistics
Fire Reports
Water Reports
Gas Emission Reports
Dust Reports
Log Books
Feasibility Studies
Mine Plans and Mine Design
Data and Statistics
Environmental records and Information
Metal Accounting, Analyses
Equipment and Plant Information
Maintenance records
Dispatch Documentation
Standard Certificates

Marketing

Customer Information
Customer Register
Price Information
Sales Reports
Market Reports
PGM Import / Export Statistics
Industry News and Information

4. Request procedure (for records as set out in Section B.3.3 of this Information Manual)

- 4.1 A request for access to a record must be made on Form C (Request for Access to Record of Private Body) set out in annexure "B" to Government Notice No. R 187 dated 15 February 2002 ("the request form"), which request form is attached hereto under Section B.8 of this Information Manual. On request, the Information Officer will telefax a copy thereof to a prospective requester for this purpose.
- 4.2 On the request form, the requester must:
- provide sufficient detail on the request form to enable the Information Officer to identify the record requested;
 - indicate which form of access to the record is required;
 - indicate if he or she wishes to be informed of the decision on the request in any manner other than is used to (and if so, state that manner and the necessary particulars to be informed);
 - must identify the right that he or she is seeking to exercise or protect;
 - provide an explanation of why the requested record is required for the exercise or protection of that right;
 - complete the request form; and
 - if a request is made on behalf of another person, the requester must submit proof of the capacity in which he or she is making the request to the satisfaction of the Information Officer.
- 4.3 The requester must submit the completed request form to the Information Officer at the address, telefax number or electronic mail address set out in Section B.1 above.

- 4.4 The following request fees are payable by every requester, other than a personal requester, before the request will be further processed:
- 4.4.1 R 50,00 (fifty Rand); and
- 4.4.2 if the Information Officer is of the opinion that six hours will be exceeded to search, prepare and/or reproduce the record requested, a deposit is payable equal to one third of the access fee (as set out in Section B.7.3 of this Information Manual) which would be payable if the request is granted.
- 4.5 The Information Officer shall, as soon as is reasonably possible, but in any event within thirty days after a proper request has been received, decide whether or not to grant the request and notify the requester thereof.
- 4.6 If the request for access is granted, the notice referred to in 4.5 above will state the access fee to be paid upon access to the record, and the form in which such access shall be given.
- 4.7 After access is granted, actual access to the record requested will be given as soon as reasonably possible.
- 4.8 If the request for access is refused, the Information Officer will provide adequate reasons for the refusal and the requester may apply to court for appropriate relief.
- 4.9 The attention of requesters is drawn to the following:
- 4.9.1 in certain circumstances the Information Officer is entitled to extend the period of thirty days referred to in 4.5 above in terms of the Act;
- 4.9.2 in certain circumstances the Information Officer is obliged to notify a third party of a request for a record to whom or which that record relates, and of the rights of such third party to dispute the decision of the Information Officer;
- 4.9.3 in certain circumstances the Information Officer is obliged to refuse a request for access to certain records in terms of the Act;
- 4.9.4 in certain circumstances the Information Officer has a discretion to refuse a request for access to a record in terms of the Act;
- 4.9.5 the rights of a requester to lodge an internal appeal against certain decisions of the Information Officer and to apply to court for appropriate relief in respect thereof.

5. *Other prescribed information in terms of section 51(1)(f) of the Act*

The Minister of Justice and Constitutional Development has not prescribed other information by regulation under the Act.

6. *Availability of the manual*

This manual is currently available as follows:

- on the Implats website at www.implats.co.za
- in hard copy, to be viewed free of charge, at the offices of Impala Platinum Holdings Limited, 3rd Floor, Old Trafford 4, Isle of Houghton, Boundary Road, Houghton
- at the offices of the South Africa Human Rights Commission, whose contact details are contained in Section B.2 above

This manual will be printed in the Government Gazette.

7. *Prescribed fees (as prescribed by the regulations to the Act)*

- 7.1 The fee to obtain a copy of this Information Manual is R 1,10 for every photocopy of an A4-size page or part thereof.
- 7.2 The request fee payable by every requester (other than a personal requester) to records in terms of the formal procedure is R 50,00 (fifty Rand).
- 7.3 The reproduction fees (for records made automatically available under Section B.3.2 above), as well as the access fees (for access to records granted under Section B.3.3 above) payable by every requester are as follows:

	Rand
(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	7,50
(ii) compact disc	70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
(f) To search for and prepare the record for disclosure, R 30,00 for each hour or part of an hour reasonably required for such search and preparation. (This fee is not applicable for records which are automatically available under Section B.3.2 above.)	

- 7.4 The actual postage is payable when a copy of a record must be posted to a requester.
- 7.5 The above fees are exclusive of value-added tax, which shall in addition be paid by the requester.

8. Prescribed forms

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000)

[Regulation 10]

A. Particulars of private body

The Head :

B. Particulars of person requesting access to the record

- | | |
|-----|--|
| (a) | <i>The particulars of the person who requests access to the record must be given below.</i> |
| (b) | <i>The address and/or fax number in the Republic to which the information is to be sent must be given.</i> |
| (c) | <i>Proof of the capacity in which the request is made, if applicable, must be attached.</i> |

Full name and surname :

Identity number :

Fax number : Telephone number :

E-mail address :

Capacity in which request is made, when made on behalf of another person :

C. Particulars of person on whose behalf request is made

<i>This section must be completed ONLY if a request for information is made on behalf of another person.</i>
--

Full name and surname :

Identity number :

D. Particulars of record

- | | |
|-----|---|
| (a) | <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the to be located.</i> |
| (b) | <i>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.</i> |

1. Description of record or relevant part of the record :

2. Reference number, if available :

3. Any further particulars of record :

E. Fees

- (a) 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.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) 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.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees :

F. Form of access to record

If you are prevented by a 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 :

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) 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 :		
<input type="checkbox"/>	copy of record*	<input type="checkbox"/> inspection of record
2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.) :		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
view the images	copy of the images*	transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound :		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)
4. If record is held on computer or in an electronic or machine-readable form :		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
printed copy of record*	printed copy of information derived from the record*	Copy in computer readable form* (stiffy or compact disk)
* If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?		
		YES NO
Postage is payable.		

G. Particulars of 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.***

1. Indicate which right is to be exercised or protected :
2. Explain why the record requested is required for the exercise or protection of the aforementioned right :

H. 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