



MNOMBO WETHU CONSULTANTS (PTY) LTD

PAIA Manual

**As prepared in terms of section 51 of
the Promotion of Access to Information Act, 2000
("PAIA") and the Protection of Personal Information Act, 2013
("POPIA").**



1. Preamble and Objectives of this PAIA Manual

The purpose of PAIA is to address the constitutional right of natural and/or juristic persons to access records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights.

PAIA provides that a person may only request information if the information is required for the exercise or protection of a right. Information will therefore not be furnished to any person unless that person clearly provides sufficient particulars to enable Mnombo Wethu Consultants (Pty) Ltd ("**Mnombo**") to identify the right the requester is seeking to protect as well as an explanation of why the requested information is required for the purpose of protection of that right.

POPIA gives effect to the constitutional right to privacy. One of the data processing principles under POPIA is that of data subject participation, which allows for data subjects to access and correct their personal information held by a responsible party. This PAIA Manual provides for a data subject to request his/her personal information from Mnombo.

Section 51 of PAIA obliges private bodies to compile a manual which would assist a person to obtain access to information held by such a private body and stipulates the minimum requirements a manual has to comply with. This PAIA Manual thus seeks to: (i) give a description of the records held by and on behalf of Mnombo; (ii) set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied; and (iii) to outline the procedure to be followed and the fees payable when requesting access to any of these records.

This PAIA Manual will be updated in terms of section 51(2) of PAIA as and when required.

A copy of this PAIA Manual is available –

- on the *Corporate / Corporate Governance* tab of the following website:
<https://www.platinumgroupmetals.net>;
- for public inspection during normal business hours at the physical address as specified under paragraph 3 below;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- at the Information Regulator upon request.

2. Company Overview

Mnombo is a Broad-Based Black Economic Empowerment company.

Mnombo is a subsidiary of Platinum Group Metals (RSA) (Pty) Ltd ("**PTM RSA**"), a wholly owned subsidiary of Platinum Group Metals Ltd., which is a Canadian mining company mainly focused on the production of platinum and palladium through PTM RSA and its subsidiaries in South Africa. Its Waterberg Project is located on the Northern Limb of the Bushveld Complex.



The Waterberg Project is a joint venture between PTM RSA, Impala Platinum Holdings Ltd., Japan Organization for Metals and Energy Security (JOGMEC) (through Tiger Gate Platinum (RF) (Pty) Ltd), Hanwa Co. Ltd., HJ Platinum Metals Company Ltd. and Mnombo. The joint venture has been incorporated into a private company, Waterberg JV Resources (Pty) Ltd., in which Platinum Group Metals Ltd. and its South African subsidiaries collectively hold the majority share.

3. Company Details: Mnombo Wethu Consultants (Pty) Ltd

<i>Information Officer:</i>	Mlibo Mgudlwa
<i>Email:</i>	POPIA@platinumgroupmetals.co.za
<i>Address:</i>	1st Floor, Rosebank Terrace, 23-25 Sturdee Avenue, Rosebank, Johannesburg, 2196
<i>Postal Address:</i>	1st Floor, Rosebank Terrace, 23-25 Sturdee Avenue, Rosebank, Johannesburg, 2196
<i>Telephone Number:</i>	011 214 7800
<i>Website:</i>	https://www.platinumgroupmetals.net

<i>Deputy Information Officers:</i>	- Schalk Engelbrecht - Jennifer de Vos
<i>Email:</i>	POPIA@platinumgroupmetals.co.za
<i>Address:</i>	1st Floor, Rosebank Terrace, 23-25 Sturdee Avenue, Rosebank, Johannesburg, 2196
<i>Postal Address:</i>	1st Floor, Rosebank Terrace, 23-25 Sturdee Avenue, Rosebank, Johannesburg, 2196
<i>Telephone Number:</i>	011 214 7800
<i>Website:</i>	https://www.platinumgroupmetals.net

4. Information Regulator's Guide

A person who makes a request for a record in terms of this PAIA Manual is referred to the Guide in terms of Section 10(1) of PAIA, which will contain information for the purposes of exercising Constitutional Rights. The Guide has been compiled by the South African Human Rights Commission, will be updated from time to time by the Information Regulator and is



available from the Information Regulator. The Guide is available in each of the official languages and in braille.

The contact details of the Information Regulator are:

Postal Address: P.O. Box 31533
Braamfontein
Johannesburg
2017

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

Complaints Email: PAIAComplaints@inforegulator.org.za
POPIAComplaints@inforegulator.org.za

General Enquiries Email: enquiries@inforegulator.org.za

A copy of the Guide is also available at Mnombo's office in English and Sepedi, for public inspection during normal office hours. A copy of the Guide will also be made available to a person, at no charge, upon receipt by Mnombo of a written request on the prescribed Form (which can be found at: <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-Reg3.pdf>) as attached hereto as Annexure B for ease of reference. If a request for access to a record is made orally as a result of illiteracy or a disability, the Information Officer will complete the prescribed form on behalf of the person making the request and provide a copy to the person.

5. Availability of Records

Requests in terms of PAIA must be made in accordance with the prescribed procedures and at the rates provided. The forms and fees are dealt with further below and in Regulations 6 and 7 of PAIA.

Please take note that not all of the records and/or information listed in this PAIA Manual will be made available to a person requesting it.

Mnombo may or must refuse a request for information should any of the grounds of refusal, as set out in Part 3, Chapter 4 of PAIA, exist, for instance but not limited to:

- the mandatory protection of privacy of a third party who is a natural person;
- the mandatory protection of commercial or confidential information (trade secrets, financial or technical information); or
- mandatory protection of records privileged from production in legal proceedings.

All requests for access to information will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

A person who made a request for a record will be notified, in writing and in the prescribed manner (Form 3), within 30 calendar days of Mnombo's receipt of that person's fully completed Request for Access form (Form 2 attached hereto as Annexure C), whether such



a request has been approved, approved in-part, or denied. A person will also be advised if it's not possible for Mnombo to give access to a particular record, for instance, if such record cannot be found or does not exist.

6. Automatic availability of certain Records

Subject to paragraph 5 above, records lodged in terms of Government and/or legislative requirements with various statutory bodies, including the Registrar of Companies are available for inspection, purchase and/or copying.

Some of the records and/or information are therefore automatically available to the public, or may be automatically available to a limited extent, some may voluntarily be made available by Mnombo, or others are not available unless requested under and in terms of this PAIA Manual, which disclosure will be subject to paragraph 5 above.

7. Legislation under which Records may be available

Records or information available in terms of certain provisions of applicable legislation (as they may be amended from time to time), includes but is not limited to:

- Broad-Based Black Economic Empowerment Act No. 53 of 2003;
- Companies Act No. 71 of 2008;
- Competition Act No. 89 of 1998;
- Constitution of the Republic of South Africa Act No. 108 of 1996;
- Disaster Management Act No. 57 of 2002;
- Employment Equity Act No. 55 of 1998;
- Income Tax Act No. 58 of 1962;
- The Insolvency Act No. 24 of 1936;
- The Occupational Health and Safety Act No. 85 of 1993;
- The Prescription Act No. 68 of 1969;
- Prevention and Combatting of Corrupt Activities Act No. 12 of 2004;
- Prevention of Organised Crime Act No. 14 of 1998;
- Promotion of Access to Information Act No. 2 of 2000;
- The Protection of Personal Information Act No. 4 of 2013;
- South African Reserve Bank Act No. 90 of 1989;
- Tax Administration Laws Amendment Act No. 33 of 2019;
- The Value-Added Tax Act No. 89 of 1991; and
- Other legislation which would ordinarily be considered applicable to the business of Mnombo.

8. Record Categories and Subjects

8.1. Company Records

- Documents of incorporation / to commence business - **Voluntarily available**
- Memorandum of Incorporation - **Not disclosed**



- Board and Shareholder minutes of meetings - **Not disclosed**
- Records relating to the appointment of directors / auditors / company secretary / public officer and other officers - **Limited automatic availability**
- Securities registers and other statutory documentation and reports - **Not disclosed**

8.2. *General Records*

- Third party vendor, contractor, supplier and document databases - **Not disclosed**
- B-BBEE certificates / affidavits - **Voluntarily available**
- Commercial agreements - **Not disclosed**
- Organisational structure - **Limited automatic availability**

8.3. *Financial Information*

- Audited Annual Financial Statements - **Automatically available**
- Financial and accounting records - **Not disclosed**
- Banking details - **Not disclosed**
- Insurance records - **Not disclosed**
- Tax compliance documents and tax returns - **Not disclosed**
- Value Added Tax records - **Not disclosed**
- Bank statements - **Not disclosed**
- Invoices in respect of creditors and debtors - **Not disclosed**
- Details of auditors - **Limited automatic availability**
- Auditors' reports in respect of audits conducted - **Limited automatic availability**

8.4. *Third Party Vendors / Contractors*

- General identification and contact information such as the third party vendor and/or its employees' name, physical and postal address, e-mail addresses, mobile numbers - **Not disclosed**
- Registration numbers issued by government bodies or agencies - **Not disclosed**
- Contractor / Supplier / Service Agreements - **Not disclosed**
- Bank account details and invoices of vendors / contractors - **Not disclosed**
- Credit history and credit score and other financial information - **Not disclosed**
- Business certificates and validation (statutory documents, B-BBEE certificates / affidavits and tax compliance status, proof of compliance with certain laws) - **Not disclosed**
- Purchasing or service records - **Not disclosed**

8.5. *Information relating to Legal Proceedings*

- Records relating to legal proceedings involving Mnombo generally - **Not disclosed**
- Disclosures relating to legal proceedings involving Mnombo which are material to the enforcement of rights - **Limited automatic availability**

8.6. *Communication*

- Public product information - **Automatically available**



- Media releases - **Automatically available**
- PAIA Manual - **Automatically available**
- Internal and external correspondence - **Not disclosed**
- News and publications - **Automatically available**
- Platinum Group Metals Ltd. website and social media platforms - **Automatically available**

8.7. *Information Technology*

- Computer software, support and maintenance agreements - **Not disclosed**
- Other documentation pertaining to computer systems and computer programmes - **Not disclosed**

The following explains the availability of records and information as disclosed above:

- * **Automatically available** – publicly available records and/or information.
- * **Voluntarily available** – will be made available on request without the requester having to follow the process in this PAIA Manual.
- * **Limited automatic availability** – a limited amount of information is automatically available to the public in the form of reports, websites, news, presentations and the like.
- * **Not disclosed** – these records and/or information must be requested in terms of the process contained in this PAIA Manual.

9. **Personal Information**

9.1. *Personal Information Processed by Mnombo*

Annexure A sets out the following:

- The personal information that is processed by Mnombo;
- Categories of data subject whose personal information is processed by Mnombo;
- The purpose of that processing; and
- Categories of recipient to whom that personal information may be supplied.

9.2. *Planned Transborder Flows of Personal Information*

Mnombo will transmit personal information to Platinum Group Metals Ltd. in Canada and may also transmit personal information to its authorised third parties and/or use hosting or cloud services that are not located in South Africa to store and process personal information. If Mnombo does so, it will ensure that the level of protection given to the personal information is at least as good as that provided for under South African law, either by means of a binding contract with the service provider, or by using a service provider located in a country with privacy laws of similar or stronger effect.

9.3. *Information Security Measures*

Mnombo takes reasonable and appropriate technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control.



This includes but is not limited to the following:

- network security devices (firewalls) that monitor incoming and outgoing network traffic, deciding whether to allow or block specific traffic based on a defined set of security rules;
- production servers and file storage systems sit in the Cloud (with reputable global service providers). Administrative access is extremely limited;
- user access to our network, the production servers, file storage systems and the like, are only granted to employees who require access to such specific servers, storage folders and systems, and employees must comply with various company policies and procedures re confidentiality, passwords, etc.;
- only Mnombo acquired devices that are domain joined to Platinum Group Metals Ltd.'s network are allowed on the Platinum Group Metals Ltd. Corporate Network. Devices are loaded with a management agent that has the ability to remote wipe/lock the device if or when necessary; and
- use of the Mnombo / Platinum Group Metals Ltd. network and devices connected to it is subject to compliance with appropriate policies dealing with security, privacy, and acceptable use.

10. Access Request Procedure

10.1. Completion and Submission of Form 2

In terms of PAIA, any request for information must be made in the prescribed manner and by completing Form 2, which is available from the Information Regulator's website: <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

Form 2 is also attached to this PAIA Manual as Annexure C for ease of reference.

Form 2 must be completed in full and returned to Mnombo's Information Officer at any of Mnombo's company details as provided at paragraph 3 above. Form 2 must be accompanied by any other information that Mnombo requires in order to consider and decide on the request. Any request which does not comply with the formalities as prescribed by PAIA (including a Form 2 not being completed, in full or otherwise) will be returned to the person making the request with advice on the necessary steps for compliance.

A request must include sufficient details to enable Mnombo to identify:

- the record/s requested;
- the person making the request (and if an agent is lodging the request, proof of capacity/authority);
- the form of access required;
- the postal address and email address of the person making the request within South Africa;
- if the person making the request wishes to be informed of the decision in any manner other than or in addition to, in writing, and if so, the particulars thereof;
- the right which the person making the request is seeking to exercise or protect, as well as an explanation of the reason the record is required to exercise or protect the right.



10.2. *Proof of identity*

In addition to Form 2, Mnombo requires the person making the request to submit proof of identity in the form of a certified copy of the person's identity document, driver's license or other legal identification document.

10.3. *Fees*

Payment details must be obtained from the Information Officer. Payment can be made either via a direct deposit or by bank guaranteed cheque (no credit card payments are accepted).

Proof of payment of the request fee must be supplied when Form 2 is submitted to the Information Officer.

A request will not be processed until the prescribed fees have been paid. Where a decision to grant a request has been taken, the record will not be disclosed until the necessary access fees have been paid in full.

The following fees are (or may be) payable:

- a) Request fee (not applicable to a natural person requesting personal records) –
A fixed request fee as prescribed by the Minister for Justice and Constitutional Development must be paid before the request will be processed. Please see Annexure B of the Amended PAIA Regulations of 27 August 2021 (GG 45057, GoN 757), at the following link to see the prescribed fees:
<https://inforegulator.org.za/acts/>
- b) Deposit (not applicable to a natural person requesting personal records) –
A deposit must be paid if the search and the preparation of the requested records are estimated to take more than 6 (six) hours.
- c) Access fee –
An access fee as prescribed by the Minister for Justice and Constitutional Development must be paid to enable Mnombo to recover the cost of processing a request and giving access to records in terms of PAIA. The access fee will depend on the amount of records required as well as the format in which the records are required. Please see Annexure B of the Amended PAIA Regulations of 27 August 2021 (GG 45057, GoN 757), at the following link to see the prescribed fees:
<https://inforegulator.org.za/acts/>

10.4. *Notification Period*

All requests complying with the requirements set out above will be evaluated, processed and considered expeditiously and in accordance with PAIA. The Information Officer will make a decision on the request and will notify the person who made the request in the required form (Form 3).



In accordance with PAIA, notification will be given, in writing, within 30 (thirty) days of the decision being made. Mnombo may, however, extend the 30 (thirty)-day notice period, if necessary, due to the nature of the request and the amount of time required to gather the requested information. The person making the request will however be given notice of the extension prior to the 30 (thirty)-day period's expiry.

In case of a request being refused, the notification will include the reasons for the refusal.

A complaint may be lodged with the Information Regulator, or an application may be made with a court: against an extension (if applicable); the procedure followed; against the refusal (if the request is refused); and/or the payment of fees / a deposit.

10.5. *Third Party Information*

If access is requested to a record that contains information about a third party, Mnombo is obliged to attempt to contact the third party to inform them of the request.

This is to allow the third party the opportunity of responding by either consenting to the giving of access to their information, or by providing reasons why the access to their information should be denied.

In the event of the third party furnishing reasons for the support or denial of access to their information, the Information Officer will consider these reasons in determining whether access should be granted or refused.

11. Reservation of Rights

Nothing in this PAIA Manual is to be construed as a waiver of the right to the confidentiality of any document or any legal privilege or right of non-disclosure attaching to any document mentioned herein, whether in terms of any statute or under the common law. All rights in this regard are fully reserved.

Date of Compilation: 15/10/2025

Date of Revision: n/a

Annexure A

Personal Information Processed in Terms of POPIA

Personal Information	Purpose of Processing	Data Subjects it relates to	Valid Recipients
<p>Supplier and third-party contractors' personal information, including:</p> <p><u>Natural Persons</u></p> <ul style="list-style-type: none"> - Full name - Identity or Passport Number - Certain criminal background check and behaviour information or records <p><u>Juristic Persons</u></p> <ul style="list-style-type: none"> - Company name - Company Registration Number - Business certificates and validation - Company information, e.g., director details - Physical address - VAT number and tax compliance status - B-BBEE certificates / affidavits <p><u>Both</u></p> <ul style="list-style-type: none"> - Contact details - Banking details - Credit history and credit score and other financial information 	<p>Managing supplier/contractor relationship for services to be provided.</p> <p>To make payments for services rendered.</p> <p>As required by statutory obligations in terms of the relevant legislation.</p>	<p>Past, current and prospective suppliers/contractors of Mnombo.</p>	<p>Management of Mnombo.</p> <p>Platinum Group Metals (RSA) (Pty) Ltd and Platinum Group Metals Ltd.</p> <p>Accounts department of Mnombo.</p> <p>Financial institutions.</p> <p>SARS.</p> <p>Statutory bodies and courts in terms of legislation or court orders.</p> <p>Professional advisors: Lawyers / Auditors / Engineers, etc.</p> <p>Outsourced verification agencies.</p> <p>Insurance providers in the event of insurance claims.</p> <p>Service providers and other third parties for business administration purposes (e.g.</p>

			<p>cloud-based data retention services).</p> <p>A person who makes successful application for access to information in terms of this PAIA Manual.</p>
<p>Stakeholder personal information, including:</p> <ul style="list-style-type: none"> - Full name - Identity Number - Company name - Company Registration Number - Physical address - Contact details 	<p>Managing stakeholder relationships.</p> <p>As required by statutory obligations in terms of the relevant legislation.</p>	<p>Past and current shareholders or other stakeholders of Mnombo.</p>	<p>Management of Mnombo.</p> <p>Platinum Group Metals (RSA) (Pty) Ltd and Platinum Group Metals Ltd.</p> <p>Statutory bodies and courts in terms of legislation or court orders.</p> <p>Professional advisors: Lawyers / Auditors / ESG Disclosure Platform Provider, etc.</p> <p>Service providers and other third parties for business administration purposes (e.g. cloud-based data retention services).</p> <p>A person who makes successful application for access to information in terms of this PAIA Manual.</p>

Annexure B

FORM 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

TO: The Information Officer

I,

Full names:				
In my capacity as (mark with "x"):	Information officer		Other	
Name of *public/private body (<i>if applicable</i>)				
Postal Address:				
Street Address:				
E-mail Address:				
Facsimile:				
Contact numbers:	Tel.(B):		Cellular:	

Hereby request the following copy (ies) of the Guide:

Language (<i>mark with "X"</i>)		No of copies	Language(<i>mark with "X"</i>)		No of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			isiXhosa	
	isiZulu				

Manner of collection (*mark with "x"*):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

Annexure C

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p align="center">PARTICULARS OF RECORD REQUESTED</p> <p><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 record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center">TYPE OF RECORD</p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer