

PAIA MANUAL

SA PRECIOUS METALS PROPRIETARY LIMITED (“SAPM”)

**THE PROMOTION OF ACCESS TO INFORMATION MANUAL
("Manual")**

1. PREAMBLE

- 1.1. This information manual has been compiled in accordance with the requirements of the Promotion of Access to Information Act, 2000 ("PAIA"). SAPM is a private body as defined in PAIA. This manual contains the information specified in section 51(1) of PAIA, which is applicable to such private bodies. This manual provides an outline of the types of records held by SAPM and the various companies and trusts in respect of which SAPM exercises control, as referred to above, and explains how a person may submit requests for access to these records in terms of PAIA.
- 1.2. PAIA came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.
- 1.3. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such body and stipulates the minimum requirements that the manual has to comply with.
- 1.4. This Manual constitutes SAPM's PAIA manual. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to everyone's Constitutional right to privacy and largely commenced on 1 July 2020. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the

establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

- 1.5. This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

VERSION	POLICY OWNER	DATE
5	SAPM Information Officer	April 2026

2. ABOUT SAPM

SAPM is a South African company, with the production facility based in Wadeville, Gauteng. We specialize in the manufacturing of precious metal fine chemicals, the refining of precious metals, as well as the fabrication of precious metal products.

3. CONTACT DETAILS

- 3.1. **Information Officer:** Paul Johnston
- 3.2. **Direct Tel:** 011 824 4393
- 3.3. **Email:** popi@sapreciousmetals.com
- 3.4. **Fax:** 011 827 0423
- 3.5. **Physical address:** 76 Kraft Road, Elandsfontein, Germiston, Gauteng, 1406.

4. INFORMATION REGULATORS GUIDE

An official Guide has been compiled which contains information to assist a person wishing to exercise the right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from Information Regulator in the manner prescribed. Any enquiries regarding the Guide should be directed to:

Postal Address:

JD House
27 Stiemens Street
Braamfontein, Johannesburg, 2001
P.O Box 31533, Braamfontein, Johannesburg, 2017

Telephone Number: 010 023 5200

E-mail Address: enquiries@inforegulator.org.za

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

5. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

- 5.1. to provide a list of all records held by the legal entity;
- 5.2. to 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;
- 5.3. to define the manner and form in which a request for information must be submitted;
and
- 5.4. to comply with the additional requirements imposed by POPIA.

6. ENTRY POINT FOR REQUESTS

- 6.1. PAIA provides that a person may only make a request for information if the information is required for the exercise or protection of a legitimate right.

- 6.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable SAPM to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of a data subject's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality, effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.
- 6.3. The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 6.4. The Information Officer will facilitate the liaison with the legal team on all of these requests.
- 6.5. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 3 above.

7. RECORDS AVAILABLE ONLY ON REQUEST TO ACCESS IN TERMS OF THE ACT

This clause serves as a reference to the categories of information that SAPM holds. The information is classified and grouped according to records relating to the following subjects and categories. The access to information under PAIA is considered on a case-by-case basis and may be refused on Statutory grounds

- 7.1. SAPM (Private Body) records:
 - 7.1.1. Financial records
 - 7.1.2. Minutes of meetings of the executive committee, departmental meetings and staff meetings.
 - 7.1.3. Strategic plans and other operational policies
 - 7.1.4. Annual reports and other statutory reports
 - 7.1.5. Newsletters, press releases and other publications

7.2. Employee Records

- 7.2.1. Employee records provided by employees
- 7.2.2. Records provided by a third party relating to employees
- 7.2.3. Conditions of employment and other employee-related contractual and quasi-legal records.
- 7.2.4. Internal evaluation records and other internal records
- 7.2.5. Correspondence relating to employees
- 7.2.6. Training schedules and material

7.3. Internal Correspondence and Documents:

- 7.3.1. Company policies and procedures
- 7.3.2. Registers
- 7.3.3. Minutes of meetings
- 7.3.4. Statutory returns
- 7.3.5. Powers of attorney
- 7.3.6. Share certificates
- 7.3.7. Title deeds
- 7.3.8. Lease agreements
- 7.3.9. Hire agreements
- 7.3.10. Hire-purchase agreements
- 7.3.11. Credit sale agreements
- 7.3.12. Ordinary and conditional sale agreements
- 7.3.13. Insurance policies and related claims

7.4. Other Party Records

Employee, supplier or private body records which are held by another party, as opposed to the records held by SAPM itself.

- 7.5. Records held by SAPM pertaining to other parties, including without limitation, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.
- 7.6. SAPM may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to SAPM.
- 7.7. Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA Manual. Amongst others, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to statutory requirements, before SAPM will consider access.

8. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF THE ACT

- 8.1. Records of a public nature, that can be access SAPM's website and may be accessed without the need to submit a formal application.
- 8.2. This information includes amongst other things, SAPM's:
- Privacy Statement
 - PAIA Manual, Annexure A, B, C
 - Quality Policy
 - Environmental Policy
 - Health and Safety Policy

- 8.3. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer through the information provided in 3 above

9. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

- 9.1. Where applicable to its operations, SAPM also retains records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act; the below mentioned legislation, and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the prescriptions of the Act, with which they use to obtain information.

Legislation	Records
Basic Conditions of Employment Act, 1997	▪ Employee details. ▪ Labour relations reports. ▪ Information regarding dismissals for dishonesty-related behaviour. ▪ Information on disability, trade union membership, race and religion. ▪ Employee next of kin or emergency contact details. ▪ Conflict-of-interest declarations. ▪ Education information. ▪ Health and safety records. ▪ Pension and provident fund records. ▪ Leave records. ▪ Internal evaluations and performance records. ▪ Disciplinary records.

	▪ Training records. ▪ Background checks.
Broad-based Black Economic Empowerment Act, 2003	▪ Skills development section on the Financial Services Council report (no unique identifiers). ▪ BBBEE status ▪ BBBEE status of suppliers. ▪ Supplier employee information. ▪ Contractor and supplier agreements. ▪ List of suppliers, products, services and distributors.
Companies Act, 2008	▪ MOI; ▪ Minutes of meetings; and ▪ Other records and correspondence.
Compensation for Occupational Injuries and Health Diseases Act, 1993	▪ Record of the earnings and other prescribed particulars of all employees.
Employment Equity Act, 1998	▪ Employment equity plans and targets.
Financial Intelligence Centre Act, 2001	▪ Identification and verification records; ▪ Client due-diligence records; ▪ Applications for credit or credit agreements; ▪ Risk management and compliance programme.
Income Tax Act, 1962	▪ IT3; ▪ IRP5; ▪ T3a; ▪ Monthly IRP5 file; ▪ Unemployment Insurance Fund (UIF) files; ▪ PAYE information; ▪ SDL information; ▪ VAT record; ▪ Ledgers; ▪ Cash books; ▪ Journals; ▪ Bank statements; ▪ Deposit slips;

	▪ Invoices; ▪ Other books of accounts; ▪ Electronic representations of information.
Insolvency Act, 1936	▪ Contracts with the client, third party, and between the client and other persons; ▪ Details of contracts, clients/suppliers, third party ▪ Engagement letters ▪ Minutes of meetings; ▪ Records of correspondence or enquiries from Clients or anyone acting on Clients' behalf; and ▪ Other Records and correspondence/
Labour Relations Act, 1995	▪ Disciplinary records, including outcomes; ▪ Labour relations reports; ▪ Arbitration awards; ▪ Records of strike action and protests.
Occupational Health & Safety Act, 1993	Occupational health and safety (OHS) reports including the following: – ▪ Learning history report; ▪ OHS agreement; ▪ OHS appointment letters; ▪ Data Centre procedure documents ▪ Incident reports; ▪ Personal information for workmen's compensation; ▪ Personal information of visitors to our premises and branches; ▪ CCTV footage.
Prevention and Combating of Corrupt Activities Act, 2004	▪ ABC Policy; ▪ Corrupt or fraudulent employee, client or merchant activities; ▪ Reports on corrupt and fraudulent activities to law enforcement agencies; ▪ Supplier Code of Ethics; ▪ Tender awards.

Promotion of Access to Information Act, 2000	▪ The PAIA manual; ▪ PAIA guide; ▪ PAIA forms.
Protection of Personal Information Act, 2013	▪ Document Retention Policy; ▪ Internal and External Privacy Policy; ▪ Personal Information Sharing Policy; ▪ Protection of Personal Information Policy; ▪ Subject Access Request Policy; ▪ Information Security Policy.
Regulation of Interception of Communications and Provision of Communication-related Information Act, 2002	▪ Acceptable Use Policy; ▪ Mobile Device Policy.
Value Added Tax Act, 1991	▪ Invoices; ▪ Tax invoices; ▪ Credit note; ▪ Debit notes; ▪ Bank statements; ▪ Deposit slips; and ▪ Stock lists.

- 9.2. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

10. HOW MUST A PERSON GO ABOUT ASKING FOR RECORDS?

In terms of section 53 of PAIA, a requester must be made as set out below:

- 10.1. The requester must provide sufficient detail on the request form to enable the head of SAPM to adequately identify the record or records requested, and the identity of the requester. The requester should also indicate which form of access is required, if the request is granted. The requester should further indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed (e.g. the postal address or fax number of the requester).
- 10.2. The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 10.3. If a request is made on behalf of a person, the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the head of SAPM.
- 10.4. The head of the private body must notify the requester (other than a personal requester, who is a requester seeking access to a record containing personal information about the requester) by notice, requiring the requester to pay the prescribed request fee (if any) and to provide proof of payment (e.g. a copy of the deposit slip), before further processing the request.
- 10.5. If the request is granted then a further access fee must be paid, which will be calculated by taking into account reproduction costs, search and preparation time and cost, and postal costs. If the search for and preparation of the record for disclosure, including arrangements to make it available in the requested form, requires more than the prescribed hours, the requester will be requested to pay as a deposit, the prescribed portion of the access fee which would be payable if the request is granted. The access fees are discussed in further detail below.
- 10.6. SAPM will process requests as soon as is reasonably possible, but within 30 days from receipt of the request, unless third parties are required to be notified of the request or the 30-day period is extended as provided for in PAIA. SAPM will notify the requester if the 30-day period for processing a request is to be extended. SAPM will notify the

requester of its decision in the required form, which is usually in writing. If the requester wishes to be informed of the decision on the request in any other manner, the requester must provide details of the required form and manner of notification.

- 10.7. SAPM may, and must in certain instances, refuse access to records on any of the grounds set out in PAIA which include: that access would result in the unreasonable disclosure of personal information about a third party, that it is necessary to protect the commercial information of a third party or of SAPM itself, that it is necessary to protect the confidential information of a third party, that it is necessary to protect the safety of individuals or property, that a record constitutes privileged information for the purpose of legal proceedings, or that it is necessary to protect the research information of a third party or SAPM itself.
- 10.8. Where a request is refused, a requester may apply to the High Court within 180 days of being informed of the refusal of the request, for an order compelling the record or records requested to be made available to the requester or for another appropriate order. The Court will determine whether the records should be made available or not.

11. AUTOMATICALLY AVAILABLE INFORMATION

- 11.1. In terms of section 52(1)(a) 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 in terms of this Act, including such categories available for inspection in terms of legislation other than this Act; for purchase or copying from the private body; and from the private body free of charge; and how to obtain access to such records.
- 11.2. In terms of regulation 5 of the Regulations relating to the Promotion of Access to Information, 2021¹ ("**PAIA Regulations**"), the head of a private body, may compile and keep a description of the categories of records contemplated in section 52(1)(a) of PAIA that are voluntarily disclosed or automatically available without a requester having to request access thereto. If such a description is compiled and kept, it must be updated as soon as practically possible after any amendment to the description occurs; and made available –
- 11.2.1. to the Information Regulator;
- 11.2.2. on the website of the private body; and

¹ GNR.757 of 27 August 2021.

11.2.3. for inspection, at the registered head office of a private body concerned during normal office hours.

11.3. SAPM has voluntarily decided to make such list available here below.

11.4. Information that is obtainable via the SAPM website about SAPM is automatically available and need not be formally requested in terms of this Manual.

11.5. The following categories of Records are automatically available for inspection, purchase or photocopying and the Regulator can access such information via the links provided below:

<https://www.sapreciousmetals.com/https://www.sapreciousmetals.com/about-us/>

12. INFORMATION AVAILABLE IN TERMS OF POPIA

12.1. In terms of POPIA, Personal Information must be processed for a specified purpose. The purpose for which Personal Information is processed by SAPM will depend on the nature of the Personal Information and the particular Data Subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the Personal Information is collected. Please also refer to SAPM's Privacy Policy further information, which is available at our website, [Homepage | SA Precious Metals](#).

12.2. Categories of personal information collected by SAPM:

SAPM may collect all types of Personal Information, including Special Personal Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to –

12.2.1. name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title, financial records and employment history, and family details, including their relationship to you;

12.2.2. identification numbers issued by government bodies or agencies, such as your identity number, passport number, tax identification number and driving licence number and company registration number;

12.2.3. demographic information such as your address, preferences and interests;

12.2.4. information relevant to the provision of our products and services;

- 12.2.5. information relevant to the procurement of products and services from suppliers;
- 12.2.6. bank account or payment card details, income or other financial information;
- 12.2.7.
- 12.2.8. special or sensitive personal information as defined in applicable data protection legislation, including information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; your genetic and biometric information; information about your sex life;
- 12.2.9. relevant information as required by applicable laws, including anti-money laundering legislation, Precious Metals Act, FICA as part of our client onboarding procedures, including evidence of source of funds; source of wealth, code of conduct, responsible supply chain, AML – CTF Financing
- 12.2.10. information you provide to us for the purposes of attending meetings and events, including dietary requirements which may reveal information about your health or religious beliefs;
- 12.2.11. still and video images captured by CCTV at our offices. We use CCTV to help provide a safe and secure environment and you may be recorded when you visit our offices; and
- 12.2.12. identity data, contact data and special personal information from publicly available sources or third parties.

12.3. The purpose of processing personal information:

- 12.3.1. In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which personal information is processed by SAPM will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.
- 12.3.2. In general, personal information is processed for purposes of dealing with complaints under the CPA, procurement purposes, records management, security, employment and related matters.

12.4. Description of the categories of Data Subjects:

SAPM holds information and Records on the following categories of Data Subjects

- 12.4.1. Employees of SAPM;
- 12.4.2. Clients / Suppliers of SAPM;
- 12.4.3. Any third party with whom SAPM conducts business,

(the list of categories of Data Subjects is non-exhaustive).

12.5. The recipients or categories of recipients to whom the personal information may be supplied:

Depending on the nature of the Personal Information SAPM may supply information or Records to the following categories of recipients

- 12.5.1. Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- 12.5.2. Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- 12.5.3. South African Revenue Services, or another similar authority;
- 12.5.4. Anyone making a successful application for access in terms of PAIA or POPIA; and
- 12.5.5. Subject to the provisions of POPIA and other relevant legislation, SAPM may share information about a client's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which SAPM operates.
- 12.5.6. 3rd party data verification agencies

12.6. Planned transborder flows of personal information

- 12.6.1. If a data subject visits SAPM's website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.
- 12.6.2. SAPM may need to transfer a data subject's information to service providers in countries outside South Africa, in which case it will fully comply with applicable data protection legislation.

12.7. **A general description of information security measures to be implemented by SAPM**

- 12.7.1. SAPM takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in our possession. SAPM takes appropriate technical and organisational measures designed to ensure that personal information remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

13. **REQUEST PROCEDURE**

13.1. Completion of the prescribed form:

- 13.1.1. A request for an access to a record must be made to the Information Officer. This request must be made to the address, fax number or electronic mail address set out in this manual. Such requests must be made by means of the form attached hereto as **Annexure A**.
- 13.1.2. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.
- 13.1.3. POPIA provides that a data subject may, upon proof of identity, request SAPM to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.
- 13.1.4. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, SAPM must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 13.1.5. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 13.1.6. POPIA provides that a data subject may object, at any time, to the processing of personal information by SAPM, on reasonable grounds relating to his/her particular situation, unless legislation provides for such

processing. The data subject must complete the prescribed form attached hereto as **Annexure B** and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

13.1.7. A data subject may also request SAPM to correct or delete personal information about the data subject 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 data subject that SAPM is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

13.1.8. A data subject 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 at the postal or physical address, facsimile number or electronic mail address set out above in this manual by means of the form attached hereto as **Annexure C**.

13.2. Payment of the prescribed fees

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 requestor) (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00R60.00

5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: • If provided by requestor • If provided to the requestor	R40.00 R60.00

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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 search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

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

13.4. Grounds for refusal of access and protection of information

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

- 13.4.1.1. the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
- 13.4.1.2. 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);
- 13.4.1.3. if disclosure would result in the breach of a duty of confidence owed to a third party;
- 13.4.1.4. if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;

- 13.4.1.5. if the record was produced during legal proceedings, unless that legal privilege has been waived;
 - 13.4.1.6. if the record contains trade secrets, financial or sensitive information or any information that would put SAPM (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
 - 13.4.1.7. if the record contains information about research being carried out or about to be carried out on behalf of a third party or by SAPM.
- 13.4.2. Section 70 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 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.
- 13.4.3. 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.

14. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

- 14.1. If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.
- 14.2. 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 the Information Regulator or a court of competent jurisdiction to take the matter further.
- 14.3. 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.

15. **AVAILABILITY OF THIS MANUAL**

Copies of this Manual are available for inspection, free of charge, at the offices of SAPM and at <http://www.sapreciousmetals.com>.

16. **OTHER**

The Manual is updated on a regular basis in accordance with the requirements of section 51(2)