

SAMANCOR CHROME LIMITED

(Registration No. 1926/008883/06)

MANUAL COMPILED IN ACCORDANCE WITH
SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT NO. 2 OF 2000 (“the Act”)

SAMANCOR CHROME LIMITED

Samancor was created in 1975 through the merger of SA manganese Limited and African Metals Corporation Limited (Amcor). Samancor Limited was delisted from the Johannesburg Stock Exchange in December 1998 by BHP Billiton ("BHPB") (60%) and Anglo American Corporation of South Africa Limited (40%). BHP Billiton and Anglo American Corporation sold the company to Kermas Limited (BVI). Until April 2006, the company consisted of two totally independent operating divisions, Samancor Manganese and Samancor Chrome and was jointly owned by BHP Billiton (60% shareholding) and Anglo American Corporation of South Africa Limited (40% shareholding). BHPB and Anglo disposed their chrome interest in Samancor in 2005 to the Kermas Group. Samancor Limited then changed its name to Samancor Chrome Limited, becoming a wholly owned subsidiary of Samancor Chrome Holdings. The current majority shareholder is Terris Chrome Limited.

Samancor Chrome comprises two chromite mining operations situated in and around Rustenburg (commonly referred to as Western Chrome Mines, or ("WCM") and in and around Steelpoort (commonly referred to as Eastern Chrome Mines, or (ECM") and five ferrochrome smelting works in Emalahleni, known as Ferrometals, Middelburg, known as Middelburg Ferrochrome, Steelpoort, known as Tubatse Ferrochrome, Brits known as TC Smelter and also close to Steelpoort, known as Tubatse Alloy. Samancor Chrome has entered into various joint ventures which are operated from Samancor Chrome's mining and Ferrochrome smelting works. The relevant joint ventures are: NST Ferrochrome (Pty) Limited; Crometals (Pty) Limited; Middelburg Steel and Alloys (Pty) Limited; Tubatse Chrome (Pty) Limited; Tubatse Chrome Minerals (Pty) Limited, Tubatse Alloy (Pty) Ltd, Poschrome (Pty) Limited and the Ferroveld Joint Venture.

Samancor Chrome Limited has subsidiaries and other associated private bodies (all referred to as "the Group Companies") which are listed in Part VI of this manual. The records of these subsidiaries and other private bodies are kept and administered by Samancor Chrome Limited and are covered by this manual.

PART I

The following information is supplied in accordance with section 51(1)(a) of the Act.

Name of the Private Body	Samancor Chrome Limited
Registration No.	1926/008883/06
Head of the Private Body	Mr Desmond McManus
Physical Address	Block A Cullinan Place 1 Cullinan Close Morningside Sandton
Postal Address	Postnet Suite 803 Private Bag X9 Benmore 2010
Website Address	www.samancorcr.com
Telephone Number	(011) 245 1000
Telefax Number	(011) 245 1200
Designated Information Officer (1)	Joslyn Sithole Senior Group Legal Counsel Legal Superintendent
Telephone Number	(011) 245 1106
Telefax Number	086 604 1272
E-mail Address	info.office@samancorcr.com
Designated Information Officer (2)	Sorrel Bolam - Geel Group Legal Counsel Legal Specialist
Telephone Number	011 245 1058
Telefax Number	086 604 1272
Email Address	info.office@samancorcr.com

PART II

The following information is supplied in accordance with section 51(1) of the Act.

Section 10 of the Act requires the South African Human Rights Commission (SAHRC) to publish a Guide containing information reasonably required by a person wishing to exercise or protect any right in terms of this Act.

This Guide will contain the following information:

- The objects of the Act;
- Particulars of the information officer of every public body;
- Particulars of every private body as are practicable;
- The manner and form of a request for access to information held by a body;
- Assistance available from both the information officers and the Human Rights Commission in terms of this Act;
- All remedies in law regarding acts, omissions, rights and duties, including how to lodge an internal appeal and a court application;
- Schedule of fees to be paid in relation to requests for access to information;
- Regulations made in terms of the Act.

Copies of the Guide will be available from the SAHRC following its publication. Enquiries regarding the Guide can be addressed to the SAHRC, the contact details of which are as follows:

Post: South African Human Rights Commission
Promotion to Access to Information Act Unit
Research and Documentation Department
Private Bag 2700
Houghton
2041

Telephone: (011) 484 8300

Fax: (011) 484 0582

Website: www.sahrc.org.za

Email: paia@sahrc.org.za

PART III

The following information is supplied in accordance with section 51(1)(c) of the Act

Categories of records which are available without a person having to request access in terms of this Act:

NONE.

PART IV

The following information is supplied in accordance with section 51(1)(d) of the Act

A. Where applicable to our operations, information is also available in terms of certain provisions of the following statutes, including, but not limited to and as amended from time to time:

- National Environmental Management: Air Quality Act 39 of 2004
- Basic Conditions of Employment Act No. 75 of 1997
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
- Competition Act No. 89 of 1998
- Constitution of the Republic of South Africa Act No. 108 of 1996
- Customs and Excise Act No. 91 of 1964
- Electronic Communications and Transaction Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Environmental Conservation Act No. 73 of 1989
- National Health Act 61 of 2003
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Mine Health and Safety Act No. 29 of 1996
- Mineral and Petroleum Resources Development Act No. 28 of 2002
- National Environmental Management Act No. 107 of 1998
- National Road Traffic Act No. 93 of 1996

- National Water Act No. 36 of 1998
- Occupational Health and Safety Act No. 85 of 1993
- Physical Planning Act No. 125 of 1991
- Road Transportation Act No. 74 of 1977
- Skills Development Act No. 97 of 1998
- Skills Development Levies Act No. 9 of 1999
- Standards Act No. 8 of 2008
- Unemployment Insurance Act No. 63 of 2001

B. Where applicable to our operations, we also retain records and documents in terms of the following statutes, including but not limited to and as amended from time to time:

- National Environmental Management: Air Quality Act No. 39 of 2004
- 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
- Customs and Excise Act No. 91 of 1964
- Electronic Communications and Transaction Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Explosives Act No. 26 of 1956 to be repealed by Act 15 of 2003 on future date
- Health Act No. 63 of 1977
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Occupational Health and Safety Act No. 85 of 1995
- Skills Development Act No. 97 of 1998
- Mine Health and Safety Act No. 29 of 1996
- Mineral and Petroleum Resources Development Act No. 28 of 2002
- National Environmental Management Act No. 107 of 1998
- National Road Traffic Act No. 93 of 1996
- National Road Traffic Act No. 54 of 1971
- National Water Act No. 36 of 1998
- Occupational Diseases in Mines & Works Act No. 78 of 1973
- Occupational Health and Safety Act No. 85 of 1993
- Physical Planning Act No. 125 of 1991
- Road Traffic Act No. 29 of 1989
- Road Transportation Act No. 74 of 1977
- Regional Services Act No. 109 of 1995

- Skills Development Act No. 97 of 1998
- Skills Development Levies Act No. 9 of 1999
- Stamp Duties Act No. 77 of 1968
- Standards Act No. 8 of 2008
- Trust Property Control Act No. 57 of 1988
- Valued-Added Tax Act No. 89 of 1991

PART V

The following information is supplied in accordance with section 51(1)(e) of the Act.

The Company holds the following categories of information:

CATEGORY	RECORDS
Commercial	Agreements Audits Correspondence with vendors Securities (bonds and bank guarantees) Policies and procedures Tender information Vendor assessment documentation
Company Secretarial and Risk Management	Annual financial statements Annual reports Approval framework Certificate of incorporation Foreign exchange dealings Insurance records Internal audit reports Memorandum and articles of association Minutes of meetings Policies and procedures Register of directors, auditors and officers Resolutions Statutory company records and returns
Exploration	Geological data (including analytical results) Geological information comprising: <ul style="list-style-type: none"> ▪ Borehole logs

- Geological reports
- Maps and plans

Finance & Admin & Treasury

Accounting records
 Annual financial statements
 Asset register
 Bank statements
 Banking details and bank account records
 Budget records
 Generally Accepted Accounting Practice
 Group Accounting policy manual
 Policies and Procedures
 Regional Services and Council returns
 SARS reports and tax and VAT returns

Health Safety & Environment

Annual sustainability reports
 Environmental procedures
 Health, safety, environment, community & quality policy
 Incident reports
 ISO certification
 Permits, licences, approvals, exemptions, authorisations, applications & registrations
 Policies and procedures
 Reports of compliance to relevant authorities
 Risk control documentation
 Statutory appointments
 Environmental Impact Assessment (2014) and Financial Regulation (2015) Regulations Compliance (website)

Human Resources

Agreements (including agreements with service providers)
 Applications for employment
 Appointments
 Audits

CATEGORY

RECORDS

Benefit arrangements rules and records

Bursary scheme records

Communications booklets, brochures, newsletters and other literature

Compensation for occupational injuries

Deferred compensation

Disciplinary procedure

Employee assistance programme

Employee benefits

Employee Information

Employment equity plans, returns and reports

Facilities management

Forms and applications

Group Life assurance cover

Health centre service and procedures

Housing guarantees and bond cover

Learnerships

Maintenance, safety and security

Medical aid rules

Motor vehicle scheme

Pension and provident fund records

Policies, codes, rules and procedures

Professional society membership

Remuneration policy and reports

Skills development returns and reports

Standard letters and notices

Study assistance

Training plans and procedures

Unemployment Insurance cover (UIF)

Workplace and union agreements and records

Legal

Contracts

Litigation records

Opinions

Policies and procedures

CATEGORY

RECORDS

Marketing

Agreements
Business plans and forecasts
Customer information
Published information on competitors
Published trade statistics
Crude steel production: figures and forecasts

Mineral Rights

Mineral leases
Mining contracts
Title deeds
Prospecting Rights
Mining Rights
Mineral Cessions
Water Licenses
Property leases
Exploration agreements
Permits / authorisations / exemptions
Environmental Impact assessments

Rehabilitation

Acceptance letters and undertakings to comply with their duties by the Trustees:

Certificates of estimates of costs for compliance for rehabilitation obligations by beneficiaries

Letters of executorships

Minutes of meetings of trustees

Other

Audits and assessments

Business development records

Drawings and specifications

Engineering records and specifications

Licenses

Maintenance records

Patents

Policies and procedures

Production records

Reports

CATEGORY**RECORDS**

Trade Marks

Trade names and/or product names

PART VI**Subsidiaries of Samancor Chrome Limited and associated private bodies covered by this Manual**

Private Body	Registration No.
Batlhako Ferrochrome Proprietary Limited	1985/070455/07
Braklands Properties Proprietary Limited	1972/007253/07
Crometals Proprietary Limited	1973/004916/07
Ferroveld Partnership	N/A
Henry Gould Proprietary Limited	1953/000691/07
Marico Chrome Corporation Proprietary Limited	1978/005144/07
Middelburg Steel & Alloys Proprietary Limited	1955/001490/07
Middelburg Technochrome Proprietary Limited	1995/004092/07
NST Ferrochrome Proprietary Limited	1971/010987/07
Poschrome Proprietary Limited	1996/008582/07
Waterkloof Mines Proprietary Limited	1957/004219/07
Tubatse Chrome Proprietary Limited	2006/036994/07
Tubatse Chrome Minerals Proprietary Limited	2006/028430/07
TC Smelters Proprietary Limited	2015/356496/07
Tubatse Alloy Proprietary Limited	2015/356066/07

Separate Manuals have been produced by the following associated private bodies:

- Samancor Pension Fund (No. PF 12/8/37727)
 - Samancor Provident Fund (No. PF 12/8/37714)
 - Samancor Group Provident Fund (FSB Registration No. 12/8/24225/1)
 - The Samancor Rehabilitation Trust (No. IT 6256/98)
 - The Samancor Lesedi Environmental Trust (No. IT 003233/2016)
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PART VII

Copyright

Where copyright subsists in the information and other resources contained in this Manual, the Company is the holder thereof and its use will not be permitted in the absence of written permission by a duly authorised officer as listed herein.

Unauthorised reproduction, adaptation, distribution or commercial exploitation of the work beyond the limited use of information permitted by law is prohibited.

Liability

While every effort is made to publish reliable information in this Manual, the Group Companies cannot guarantee that this information is both complete and accurate and makes no representation in that regards. All users of this resource are therefore cautioned to use the information entirely at their own risk.

The Group Companies and other entities whose details appear herein will not be liable for any loss or damage, action, proceedings, claims, demands, liability, damages, costs, charges or expenses, however arising, as a result of the use of Samancor Chrome's website or the information contained in this Manual. All users agree to submit exclusively to the laws of the Republic of South Africa and the jurisdiction of the Courts of the Republic of South Africa in respect of any dispute arising out of the use of Samancor Chrome's website or the information contained in this Manual.

The Group Companies and other entities whose details appear herein absolutely reserve the right to disclose information that is the subject of a request where there are grounds for refusal of access to such records in terms of chapter 4 of the Act.
