

HIGHLAND METALS CC

VAT NO:4520219090/CC NO:2003/001730/23

A REGISTERED BEE COMPANY-CERTIFICATE REG:GEN0009/2016

A MEMBER OF THE **MRA OF SA/EWASA/ROSE FOUNDATION/IWMSA**

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CONTACT PERSONS:

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Effective Date: 1st October 2025

1. Introduction & Purpose

Highland Metals (Pty) Ltd ("Highland Metals") recognizes and supports the constitutional right of access to information and is committed to transparency and accountability. This manual has been prepared in terms of section 51 of the Promotion of Access to Information Act (PAIA) and reflects amendments through POPIA

2. Contact Details

Information Officer (Head of Private Body)

Name: Mr. H. Outram

Telephone: 082 784 6829

Email: harold@highlandmetals.so.za

Postal Address: P.O. Box 13397 Leraatsfontein 1038

Physical Address: 76 Newton Street, Ferrobank, Emalahleni, Mpumalanga

Deputy Information Officer (if delegated)

Name: Jackie Harmse

Telephone: 073 749 0396

Email: jackie@highlandmetals.co.za

General Access-to-Information Contact

Email: info@highlandmetals.so.za

Website: <https://highlandmetals.co.za>

3. Records Automatically Available (Without PAIA Request)

These are accessible directly (e.g., via website) and do not require formal PAIA requests:

Category of Records**Description**

Company	Company profile, services, contact details
Background	Safeguarding policies, safety statements
Published Policies	Marketing Materials Brochures, announcements, news

4. Records Available in Terms of Other Legislation**Record****Applicable Legislation**

Memorandum of Incorporation Companies	Act 71 of 2008Annual Financial Statements
POI-related Policies	Companies Act / Financial Regulations
POPIA,	where applicable
Highland Metals holds these records as required by legislation and includes them for transparency.	

5. Subjects on Which Records Are Held & Categories**Subject Area**

Corporate Governance Minutes, strategies, board policies
Financial
Health & Safety
HR
Procurement
Environmental

Categories of Records

Financial statements, tax records
Risk assessments, safety audits
Employment policies, personnel data
Contracts, supplier records
Compliance reports, licenses

6. Processing of Personal Information

Purpose:

Highland Metals processes personal data for HR, compliance, safety, contract management, and third-party communications.

Categories of Data Subjects & Personal Information

Processed:

- **Employees & Contractors:** ID, contact info, work history, performance records.
- **Suppliers & Clients:** Company and contact details, contract data.
- **Job Applicants:** CVs, references, contact details.
- **Website Visitors:** Analytics data, communication logs (where applicable).

Information Security Measures:

Highland Metals employs standard data protection measures to ensure confidentiality, integrity, and availability of personal information—aligned with POPIA requirements.

7. Request Procedure under PAIA

- All requests must be in writing and submitted to the Information Officer using prescribed
- Include sufficient detail: requester ID, record description, form of access, and a right to be protected/exercised.
- If a request is made on someone's behalf, proof of capacity must be provided.

8. Fees

- **Request Fee (non-personal requesters):** [e.g., R140.00 incl. VAT].
- **Access Fee:** R145.00 per hour (or as prescribed) for search and preparation.
- **Deposit:** One third of the access fee if search exceeds six hours.
- **Reproduction & Delivery Costs:** Actual expenses or fixed rates (e.g. R40–R60 for CD/flash drive).
- **Refunds:** Deposits will be reimbursed if the request is refused.

9. Decision Timelines & Extensions

- Final decisions must be communicated within **30 days** from receipt of the complete request.

- This may be extended by up to **another 30 days** for complexity or multiple records; the requester must be notified with reasons.

10. Refusal, Appeal, & Remedies

- ➔ Highland Metals does **not** offer an internal appeal. If a request is refused, the requester may:
- ➔ Lodge a **complaint with the Information Regulator**; or
- ➔ Approach a **court of competent jurisdiction**, within 180 days of refusal.

This manual is reviewed and updated as required—especially when legislation changes. The latest version will always be available on the Highland Metals website and at its principal office