AECI General Privacy Notice

Approved by the AECI Executive Committee on 13 March 2025

Position Statement

AECI is committed to protecting the privacy and security of personal information in compliance with applicable data privacy laws across all jurisdictions where it operates. As a responsible party, AECI ensures that the collection, processing, storage, and sharing of personal information are conducted lawfully, fairly, and transparently. This General Privacy Notice reflects our commitment to safeguarding the personal data of customers, service providers, and other stakeholders, ensuring that their rights and freedoms are respected in accordance with relevant legal frameworks.

Preface

This General Privacy Notice sets out the approach of AECI (including each of AECI Limited and its subsidiaries) (we, our, us) in relation to our management of personal information. It is designed to provide stakeholders with clarity on how their data is processed and to ensure compliance with data privacy laws, including but not limited to the Protection of Personal Information Act (POPIA), the General Data Protection Regulation (GDPR), and other relevant data privacy laws.

Purpose

The purpose of this General Privacy Notice is to:

- Establish AECI's commitment to data privacy and security.
- Define the principles governing the collection, processing, and retention of personal information.
- Provide guidance on how AECI safeguards data and ensures compliance with applicable laws.
- Inform stakeholders of their rights concerning their personal information.
- Ensure a consistent approach to data protection across AECI's operations.

Scope

This General Privacy Notice applies to:

- All AECI business units, subsidiaries, and affiliates that process personal information.

- All individuals whose personal information is collected and processed by AECI, including, job applicants, customers, service providers, website users, and other stakeholders.
- All forms of personal information, including but not limited to contact details, identification numbers, financial records, employment history, and special personal data where applicable.
- All methods of data collection and storage, whether digital, physical, or through third-party systems, ensuring robust security measures are in place.

Application

This General Privacy Notice is applicable to all AECI operations worldwide and governs:

- The collection and use of personal information necessary for AECI's business functions, including human resources, procurement, stakeholder engagement, regulatory compliance, and safety activities.
- The lawful processing of data in accordance with contractual obligations, legal requirements, and legitimate business interests.
- The handling of transborder data flows where AECI operates in multiple jurisdictions.
- The security protocols and governance measures adopted to prevent unauthorized access, misuse, or breaches of personal information.

Breach

Failure to comply with this Privacy Notice and its provisions may result in disciplinary action, regulatory penalties, or legal consequences. All AECI employees, contractors, service providers, and stakeholders who process or have access to personal information are expected to adhere to the principles set out in this Notice.

Consequences of Non-Compliance:

1. **Employees and Contractors:**

- Disciplinary action, up to and including termination of employment or contractual agreements.
- Potential legal liability if non-compliance results in a violation of applicable data privacy laws.

2. **Third-Party Service Providers and Business Partners:**
   - Termination of agreements or partnerships in cases of non-compliance with AECI's data protection requirements.
   - Financial penalties or legal action if the breach results in harm to AECI or its stakeholders.
3. **Regulatory and Legal Consequences:**
   - Fines and sanctions imposed by data protection regulators for non-compliance with POPIA, GDPR, or other applicable privacy laws.
   - Reputational damage and potential litigation if personal data is unlawfully processed or disclosed.

All breaches of this General Privacy Notice must be reported immediately to AECI's Information Officer at Information.Office@aeciworld.com. AECI will investigate all reported incidents and take appropriate remedial action in line with regulatory requirements. This General Privacy Notice must be read in conjunction with our Promotion of Access to Information (PAIA) Manual which can be accessed at https://investor.aeciworld.com/pdf/governance/paia-manual-2023.pdf

PERSONAL INFORMATION WE COLLECT

1. We will only collect personal information if it is reasonably necessary to pursue at least one of our functions and activities in the course of operating our manufacturing, sales and services businesses. In support of our core business, we also carry out the following related functions and activities:
   - human resource activities relating to job applicants and former employees, including recruitment, retirement and succession planning, labour-related litigation, and associated taxation and reporting activities;
   - benefit provision and administration in relation to our pension fund, provident fund, and life insurance for our former employees;

- scholarships, bursaries, donations and other social responsibility initiatives;
- safety activities;
- procurement, vendor management and supply chain activities;
- corporate administration;
- property management and security services; and
- stakeholder relations and engagement activities.

2. The personal information that we collect varies with the functions and activities that we engage in, and (without limitation) may include:
    - contact and identification information: including names, date of birth, titles, marital status, gender, identity numbers, email addresses, residential addresses and telephone numbers;
    - business details: company registration numbers, tax numbers and banking details;
    - financial information and credit-worthiness records, criminal and enforcement history, political exposure, sanctions and adverse media information and opinions relevant to doing business with us;
    - information received from prospective and former employees that is relevant to employment with us (see paragraph 3 below);
    - details of any claims brought under any relevant workers' compensation scheme;
    - performance reviews and assessments, development plans and career aspirations;
    - details and nature of complaints, queries, grievances and tip-offs that we receive;
    - IP addresses and usage data regarding the use of our websites and applications by visitors to our websites;
    - correspondence between us;
    - special personal information recorded in paragraph 6 below;
    - information of children recorded in paragraph 7 below; and
    - other personal information you have given us.

We may also process your personal information to fulfil our obligations under equal opportunity laws and anti-money laundering laws or other laws that may be applicable to the organisation in your jurisdiction.

3. In the course of carrying out recruitment activities, we may collect information regarding your educational and/or trade qualifications, skills, authorisations, career history, job interests and such other information as may be routinely included in a curriculum vitae. We may also collect personal information during standard pre-employment checks, such as criminal and background checks, health checks and psychometric testing.

4. From time to time, we may collect special personal information about you in order to conduct our functions and activities. However, we only collect special personal information:
    - where the collection is reasonably necessary for one or more of our activities or functions;
    - we have your consent to the collection; or
    - an exception applies (see paragraph 6 below).

5. There are a number of circumstances that permit the collection of special personal information about you without your consent. We only collect special personal information without your consent if one or more of those circumstances applies.

6. The special personal information that we collect may include:
    - race or ethnic origin to the extent that it is necessary to comply with legal requirements or to advance the interests of groups of persons disadvantaged by unfair discrimination.
    - biometric and criminal background information which we collect to protect the security of our business.

7. We collect personal information of children in narrowly defined circumstances and only where the consent of a competent person has been obtained or

where we are legally required and entitled to do so in terms of applicable data privacy laws:

- as nominated beneficiaries under any insurance policy, pension or provident fund for the purpose of recording the nomination on your behalf or locating the beneficiary.
- as recipients of social responsibility initiatives, scholarships or other charitable contributions where the details are necessary to access the benefit or required as evidence that the benefit has been provided.

HOW WE COLLECT AND STORE PERSONAL INFORMATION

8. We will only collect personal information if it is reasonably necessary for us to carry out our functions and activities, and only by lawful and fair means that are not unreasonably intrusive.

9. In most cases, we will collect personal information directly from you. However, we may also collect personal information through the following means:
   - publications and written correspondence, including newspapers, magazines, journals, letters, emails and text messages;
   - telephone conversations, including reference checks;
   - websites, including through the use of cookies;
   - CCTV video and audio recordings; and
   - social media, such as Facebook, X, LinkedIn and TikTok.

10. If you supply us with personal information of a third party, we accept that information on the condition that you have the right to provide that personal information to us to use for our functions and activities.

11. In order to carry out our functions and activities, we may collect personal information from third parties, including nominated referees, former employers, recruitment agencies, skills and qualification verification agencies, medical practitioners, credit-bureaus, international sanctions, political exposure and adverse media watch-lists.

12. We will only collect personal information from third parties if: (a) we are required or authorised by or under applicable data privacy laws to collect the information from someone other than the individual concerned; or (b) it is unreasonable or impracticable to collect the information directly from you.

13. We store hardcopy documents containing personal information in secured facilities.

14. Electronic documents are stored with security measures and protocols implemented to ensure the security and confidentiality of the documents and the personal information contained in them.

15. Where documents and personal information are stored in cloud-based systems (for example SAP or Microsoft365), we ensure that we first identify the location of all servers, with preference given to in-country hosting services. In all cases, we ensure that all cloud-computing service providers have appropriate security measures in place.

16. The supply of your personal information to AECI in most instances, is mandatory. However, if you refuse to supply any information, certain consequences may naturally flow from such a refusal, such as preventing AECI from concluding or performing a contract with you.

LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

17. We only process your personal information if there is a legal basis for us to do so. In most cases, the legal basis will be one of the following:
    - to fulfil our contractual obligations to you. For example, to pay you in connection with the goods/services you provide;
    - to comply with our legal obligations. For example, retaining information in compliance with tax obligations;
    - to meet our legitimate interests. For example, to carry out vendor risk assessments and vendor management;
    - if you consent. For example, consenting to the collection of cookies on our website; and

- to protect your or another person's legitimate interests.

PURPOSES FOR WHICH WE DISCLOSE PERSONAL INFORMATION

18. AECI is a global group, with offices and/or operations/projects located in South Africa, the rest of the African continent, Mauritius, Europe, North and South America, Indonesia and Australia. We may share some personal information with different international offices within the AECI group. For example, personal information may be distributed when our South African employees undertake training programmes and/or secondments at other operations/projects within the AECI group. Personal information may also be distributed during the course of AECI's talent review, culture surveys and for the purpose of ensuring that employees can communicate with one another. See further information about this at paragraphs 46-49.

19. Generally, we will only use or disclose personal information for the purpose for which it was collected. For example, if we collect your personal information for the purpose of corporate administration, we will generally only use and disclose that information for that purpose.

20. From time to time, we may use or disclose personal information for compatible additional purposes if we receive your consent or if applicable data privacy laws otherwise permit us to do so. For example we may use and disclose personal information for a compatible further purpose without your consent if the information is available in or derived from a public record or has deliberately been made public by you, to comply with an obligation imposed by law, for the conduct of legal proceedings or where the processing is necessary to prevent or mitigate a serious and imminent threat to public health and safety or to your or another's life or health.

21. From time to time, we may need to disclose personal information to third parties to carry out our functions and activities, including the following: (a) local and international consulates and/or government immigration departments regarding work visas, immigration agents and credit or background reporting agencies; (b) government organisations; (c) AECI's

Pension or Provident Fund and third-party funds and their administrators; (d) our bankers and auditors, in relation to any shares granted and held by you under relevant payment and incentive programmes; (e) insurers (and their advisors) regarding applicable employee policies in place and/or in relation to insured incidents which occur in the workplace; (f) professionals qualified to undertake psychometric or other assessments; (g) consultants to conduct qualification and trade checks (whether on a national or international basis); (h) travel and accommodation services providers; (i) third parties (including, but not limited to Environmental, Labour, Health & Safety, Prudential Authorities and other government inspectors) conducting site access or assured role checks; (j) service providers undertaking surveys (for example a Culture Survey), or polling; and (k) other contractors; and (l) third party advisors, such as external lawyers.

22. When disclosing personal information to third parties we will contractually mandate the third party to take adequate precautions and have security measures in place to protect your personal information and comply with the applicable data privacy laws.

AECI websites

23. Our websites use “cookies”, which are small text files that can be used by websites to make a user's experience more efficient. We use cookies to personalise content and ads, to provide social media features and to analyse our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you have provided to them or that they have collected from your use of their services.

24. Our service providers use this information to evaluate your use of the website, compile reports on website activity for website operators and to provide other services relating to website activity and internet usage. The service providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on the service provider’s behalf. You may refuse the use of

cookies by selecting the appropriate settings on your browser or specifying your cookie consent *via* a "Cookiebot". However, please note that if you do this, you may not be able to use the full functionality of our websites. By using our websites, you consent to the processing of data about you by our service providers in the manner and for the purposes described.

25. *Links to other websites.* AECI's sites may include links to other websites with privacy practices that may differ from ours. Any information you submit to a website not belonging to AECI is governed by that site's Privacy Policy, not this Notice.

NOTIFICATION OF COLLECTION

26. We will take reasonable steps to make you aware of this Notice and any specific detail not provided herein, unless we are excused from doing so under applicable data privacy laws. Where the information is not collected from you directly, we will inform you of the source from which it is collected. We will provide this information to you when we collect it or prior to collecting it. If it is not practicable to provide this information at the point of collection, we will do so soon thereafter.

27. We will provide you with the following information: our name and address; the purpose for which the information is being collected; what information is required or optional; the consequences of the failure to provide the information; any particular law authorising or requiring the collection of the information; if the information will be transferred to another country or international organisation; and the level of protection afforded to the information by that other country or international organisation.

28. We may also need to take steps to demonstrate that the processing of your personal information is reasonable by notifying you of the following: the recipient or category of recipients of the information; nature or category of the information; the existence of the right of access to and the right to rectify the information collected; the existence of any right to object to the processing of personal information; the right to lodge a complaint to the applicable data privacy regulator; and the contact details of the applicable data privacy regulator.

QUALITY OF PERSONAL INFORMATION

29. We endeavour to take reasonable steps to ensure that the personal information that we collect is complete, accurate and up to date. Further, we endeavour to take reasonable steps to ensure that the personal information that we use or disclose is, having regard to the purpose of our use or disclosure, complete, accurate and up to date.

SECURITY OF PERSONAL INFORMATION

30. We will secure the integrity and confidentiality of your personal information by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information, and unlawful access to or processing of your personal information.

31. Measures may include identifying risks, establishing appropriate safeguards, verifying the safeguards are implemented and updating those safeguards where appropriate.

32. The AECI IT environment is hosted in a certified TIER 4 BCX Data Centre (BCMS - ISO 22301:2019, ISMS Cloud Security - ISO/IEC 27017:2015, QMS - ISO 9001:2015, ISMS - ISO/IEC 27001:2013, ISMS - ISO/IEC 20000-1:2018, PII In Public Cloud - ISO/IEC 27018:2019). The table below outlines some of the minimum-security measures currently in place:

Security Domain	**Control Measures in Place**
Identities and Access	• Encrypted Password, • Multifactor authentication (MFA) on all Microsoft Application.

Endpoints (Workstations)	• Endpoint Detection and Response (EDR) with 24/7 monitoring. • Intune Device Management-To deactivate once lost
Applications	• Transaction logs review, • Access Control with Password.
Networks	• Perimeter Firewall with Intrusion Prevention System (IPS) capabilities • Denial of Service (DDoS) protection capabilities • Segmented VLAN in the data center network • Virtual Private Network (VPN) for remote work
Infrastructure	• Patch management • Vulnerability management, • Backup • High availability.
Data	Encryption in transit
Email system	Blocking malware and phishing emails
Incident Monitoring and Management	• 24/7 Security Operation center • Annual Penetration testing • Internal Audit/External Audit

33. As described in paragraph 1 above, AECI ordinarily processes personal information reasonably necessary for us to pursue our functions and activities in the course of our manufacturing, sales and services business. In rare circumstances, we may be required to process personal information on your behalf. In those circumstances, we will only process that personal information for which you are responsible, and only with your knowledge or authorisation. We will further treat it as confidential and not disclose it unless we are obliged to do so under applicable data privacy laws or in the course of properly performing our obligations to you.

34. Where there are reasonable grounds to believe that your personal data has been accessed or acquired by an unauthorised person, we will notify the applicable data privacy regulator. We will also notify you unless we cannot identify you. Notification will be done in at least one of the following ways: mailed to your last known physical or postal address, sent by e-mail to your last known e-mail address, placed in a prominent

position on one or more of our websites, published in the news, media or as may be directed by the applicable data privacy regulator.

RETENTION AND RESTRICTION

35. We will only retain records of your personal information for as long as necessary to achieve the function or activity for which it was collected or otherwise lawfully processed.[1] If we are obliged by applicable laws to retain the information for a longer period then we will do so or, if we have used the personal information to make a decision about you, then we will retain the records for a reasonable period to allow you to request access to that record. In certain circumstances, we may restrict processing of your personal information. Records of personal information will be destroyed or deleted as soon as is reasonably practicable after we are no longer authorised to retain it. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

ACCESS TO PERSONAL INFORMATION

36. To find out how to make requests about your personal information, please refer to our PAIA manual which you can access at https://www.ftp.aeciworld-online.com/pdf/policies/2023/paia-manual-2023.pdf.

37. You are entitled to enquire whether we hold personal information about you and to request it to be corrected. In certain circumstances you are also entitled to request the destruction of your personal information or to object to or have its further processing restricted. If you request access to records of your personal information we will, within a reasonable period of the request being made, give access to the information in the manner requested (this might attract a fee) unless we have good grounds to refuse the request.

38. Any of your requests related to your personal information, should follow the procedure set out in our PAIA manual https://www.ftp.aeciworld-

[1] If you are a job applicant, we may retain your CV on file for future appointments/future positions. If you are not comfortable with this, please contact us, and we will delete your records.

online.com/pdf/policies/2023/paia-manual-2023.pdf, be in writing and addressed to the Information Officer at:

Full name	: AECI Limited
Registration number	: 1924/002590/06
Registered address	: 1st floor,AECI Place 24 The Woodlands, Woodlands Drive Woodmead Sandton
Postal address	: Private Bag X21 Gallo Manor 2052
Telephone number	: +27(0)11 806 8700
Fax number	: +27(0)11 806 8701
Head / Chief Executive	: Mr. H Riemensperger
Designated Information Officer	: Mr. M C Brouckaert;
Email:	Information.Office@aeciworld.com
Website	: www.aeciworld.com

39. If you require any assistance with data privacy queries or have any concerns about our privacy practices, please send an email to Information.Office@aeciworld.com.

40. In certain circumstances we may not comply with an access request in full or at all. This would occur only where we are entitled or obliged to refuse access, for example, where we cannot reliably establish your identity, where providing the information involves the unreasonable disclosure of personal information about someone else or might endanger the life or safety of a person or prejudice the security of property.

41. Where you have made a successful request for the correction of your personal information, if reasonably practical we will notify anyone to whom we have disclosed that information of the correction.

COMPLAINTS

42. If you believe that we have not complied with applicable data privacy laws, in any way, in relation to your personal information, you may make a written complaint to the Information Officer.

43. The Information Officer will review the complaint, consider our conduct in relation to the complaint and the requirements of the applicable data

privacy laws, and will consider appropriate action. The Information Officer will inform you of his or her decision within 30 days of receiving the complaint.

44. If you are still unsatisfied with the Information Officer's determination, you may make a complaint to the applicable data privacy regulator at:

Authority:	Known as:	Address:	Contact details:
Information Regulator South Africa	Information Regulator	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001	Email for reporting security compromises: popiacompliance@inforegulator.org.za Tel: 012 406 4818 Fax: 086 500 3351
Regulator Europe (Germany)	Data Protection Authority	Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit Husarenstraße 30 53117 Bonn	Tel. +49 228 997799 0; +49 228 81995 0 Fax +49 228 997799 550; +49 228 81995 550 Email: poststelle@bfdi.bund.de Website: http://www.bfdi.bund.de/
Office of the Australian Information Commissioner	OAIC	GPO Box 5288 Sydney NSW 2001	Tel: From within Australia: 1300 363 992 (Enquiries line) From outside Australia: +61 2 9942 4099 Online privacy complaint form: Office of the Australian Information Commissioner
National Data Protection Authority (ANPD) Brazil	ANDP	Setor Comercial Norte - SCN, Quadra 6, Conjunto "A", Edifício Venâncio 3000, Block "A", 9th floor, CEP 70.716-900 - Brasília – DF.	Tel : (61) 2025-8101 Website: https://www.gov.br/anpd/pt-br/canais_atendimento/cidadao-titular-de-dados/denuncia-peticao-de-titular

45. We would however appreciate the chance to deal with your concerns before you approach the regulatory bodies listed above, so please first contact us.

TRANSBORDER FLOWS

46. Circumstances may arise where we may need to disclose personal information to overseas recipients. As mentioned in paragraph 18 above, AECI is a global group, with further offices and/or operations/projects located in South Africa, the rest of the African continent, Mauritius, Europe, North and South America, Indonesia and Australia.

47. As part of our global operations, we may share some of your personal information with other entities within the Group, and to third parties outside of the Group.

48. Please note that the overseas offices of AECI may not be subject to privacy regimes that are equivalent to the privacy regime where you are located. For instance, in most jurisdictions, information regarding juristic persons (i.e. companies, trusts) is not considered personal information as it is in South Africa. However, AECI entities are required to treat your personal information with confidentiality and to only use and disclose your personal information for purposes that are set out in this Notice.

49. Before disclosing personal information to any overseas recipient (whether within or outside AECI), we will take steps to ensure that your personal information receives adequate and consistent levels of protection and ensure compliance with applicable data privacy laws.

Jurisdictional Distinction

50. Addendum A to the AECI General Privacy Notice applies specifically to AECI's Australian operations, ensuring compliance with the Australian Privacy Principles (APPs under the Australian Privacy Act 1988 (Cth). While the General Privacy Notice establishes AECI's global approach to personal data protection, this Addendum provides jurisdiction-specific provisions for Australia. In cases where the General Privacy Notice conflicts with Australian privacy laws, the terms of this Addendum shall take precedence for data subjects in Australia.

Regulatory Alignment

51. The AECI General Privacy Notice, along with its jurisdiction-specific addenda, is designed to ensure compliance with key regulatory frameworks governing personal data protection across all regions where AECI operates. AECI is committed to upholding the highest standards of data privacy by aligning its practices with applicable laws, including the Protection of Personal Information Act, 2013 (POPIA) in South Africa and the Australian Privacy Act 1988 (Cth), which incorporates the Australian Privacy Principles (APPs). These frameworks guide the responsible collection, processing, and management of personal information to ensure lawful, fair, and transparent data handling. Where necessary, AECI also adheres to other relevant data privacy laws applicable to its operations, reinforcing its commitment to protecting the rights and freedoms of data subjects while maintaining compliance with legal and regulatory requirements.

Definitions

competent person means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child;
consent means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
data privacy laws mean the applicable data privacy laws and regulations, in each country that AECI operates, such as Protection Of Personal Information Act (POPIA), the General Data Protection Regulation: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the Australian Privacy Act 1988 (Cth).
data privacy regulator refers to the regulatory / supervisory authority overseeing personal information protection in the relevant jurisdictions. This includes the Information Regulator of South Africa under the Protection of Personal Information Act 4 of 2013 (POPIA), the office of the Australian Information Commissioner, responsible for enforcing the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) and the relevant Data Protection Authority under the EU General Data Protection Regulation (GDPR).
personal information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

(b) information relating to the education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person; (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; (g) the views or opinions of another individual about the person; and (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;
PAIA Manual means AECI's manual, prepared in accordance with section 51 of the South African Promotion of Access to Information Act 2 of 2000
processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including— (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) dissemination by means of transmission, distribution or making available in any other form; or (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;
operator/data processor means a person who processes Personal Information for and on behalf of the responsible party in terms of a contract or mandate, without coming under the direct authority of the responsible party
responsible party / data controller means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information. AECI is a **responsible party/ data controller**.
special personal information means personal information concerning— (a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or (b) the criminal behaviour of a data subject to the extent that such information relates to— (i) the alleged commission by a data subject of any offence; or (j) any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

Accessibility

The AECI General Privacy Notice is available on the AECI website at www.aeciworld.com. Internally, AECI employees can access the Policy through the Governance and Compliance SharePoint site.

Should you have any questions in terms of any element of the policy, please make use of the below information.

Contact Person:	Group Company Secretary & Group Compliance Officer
Contact E-mail:	Information.Office@aeciworld.com

Review and Revision

AECI may amend the provisions of this General Privacy Notice to comply with any changes in the law, and/or pursuant to any changes to its processing activities or privacy practices. Such amendments will be published on AECI's website and will become operable from the date of such publication.

This General Privacy Notice must be approved by the AECI Executive Committee and reviewed at least every two years.

AECI GENERAL PRIVACY NOTICE - ADDENDUM A

Introduction

(a) AECI Australia Pty Ltd (ACN: 165 704 870), its subsidiaries and affiliates in Australia (collectively referred to as "we" and "us") are committed to managing personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) and in accordance with other applicable laws.

(b) AECI Australia Pty Ltd is a subsidiary of AECI Limited, a company registered in South Africa which has a General Privacy Notice (GPN) that protects all the Personal Information we collect and helps ensure that Personal Information is handled properly, including in accordance with the Australian Privacy Act. This addendum provides the additional provisions applicable to residents or Data Subject in Australia.

(c) This document, together with the GPN sets out our approach for managing personal information and is referred to as our Privacy Notice.

(d) In this Privacy Notice, “we” and “us” refers to AECI Australia Pty Ltd and “you” refers to any individual about whom we collect personal information.

(e) Any term used in the GPN which is defined under Australian law, will be read to have the meaning given to that term under Australian law.

(f) Any references to laws, regulations or positions appointed by laws or regulations in the GPN which have an Australian counterpart or equivalent, will be read to be a reference to the Australian counterpart or equivalent.

About AECI Australia Pty Ltd

- AECI Australia is a provider of mining safety and chemical extraction services.
- AECI Australia Pty Ltd offers a complete range of services, including making mining safer and more efficient by using the latest technologies.

- Please contact us for a full list of the companies which comprise AECI Australia Pty Ltd and which are subject to this Privacy Notice Addendum.

Purpose of Collection of Personal Information

Your Personal Information will only be used:

- For the purposes for which we collected it, such as to provide a product or service;
- For reasonably expected secondary purposes, such as payment processing and financial account management, contract management, website administration, business continuity and disaster recovery, security and fraud prevention, analytics, corporate governance, reporting and legal compliance;
- For other purposes as permitted by the APPs, such as when the use or disclosure is needed to protect you, us or others from threats (such as security threats or fraud), or comply with the laws that are applicable to us around the world;
- With your consent (or provided you have not objected, as may be appropriate under applicable law), such as to provide you with marketing communications.

Special Personal Information = Sensitive Information

- For Australian Data Subjects, references to "Special personal information" in the GPN are a reference to "Sensitive Information" as defined below.
- We will only collect and use Sensitive Information in accordance with the Privacy Act and only for the purpose for which it is provided.
- Sensitive information is Personal Information that includes information or an opinion about a Data Subject's:
    - racial or ethnic origin;
    - political opinions or associations;
    - religious or philosophical beliefs;
    - trade union membership or associations;
    - sexual orientation or practices;
    - criminal record;
    - health or genetic information; or
    - biometric information.

Can you deal with AECI Australia Pty Ltd Anonymously?

- AECI Australia Pty Ltd will provide individuals with the opportunity to remain anonymous or use a pseudonym in their dealings with us where it is lawful and practicable to do so (for example, when making a general enquiry). Generally, it is not practical for AECI Australia Pty Ltd to deal with individuals anonymously or pseudonymously on an ongoing basis.

How does AECI Australia Pty Ltd hold information?

- AECI Australia Pty Ltd stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third-party storage providers based in Australia or overseas. Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

- AECI Australia Pty Ltd maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

- Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.

- We take steps to destroy or de-identify information that we no longer require

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Does AECI Australia (Pty) Ltd disclose your Personal information Overseas?

- AECI Australia Pty Ltd is a global organisation and works with clients, service providers, sponsors and has commercial interests across the globe. It is likely that your personal information will be disclosed to overseas recipients.

- Unless we have your consent, or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information.

- Entities which are related entities of AECI Australia Pty Ltd or are otherwise affiliated with AECI Australia Pty Ltd are located in South Africa, the African continent, Mauritius, Europe, North and South America and Indonesia. In circumstances where your information is

disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which AECI Australia Pty Ltd and its related entities and affiliates operate.

How can you access or Seek correction of your Personal Information?

- You are entitled to access your personal information held by AECI Australia Pty Ltd on request. To request access to your personal information please contact our privacy officer using the contact details set out below.

- You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

- We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

- However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

- We may decline your request to access or correct your personal information in certain circumstances in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

What should you do if you have a compliant about the handling of your Personal Information?

- You may contact AECI Australia Pty Ltd at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

- You may make a complaint about privacy to the privacy officer at the contact details set out below.

- The privacy officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

- If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

- In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

- If you are not satisfied with our response to your complaint, or you consider that AECI Australia Pty Ltd may have breached the APPs or the Privacy Act, a complaint may be made to:

  The Office of the Australian Information Commissioner

  Telephone: 1300 363 99

  By using the contact details on the website www.oaic.gov.au.

- AECI Australia Pty Ltd may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website (aeciworld.com) regularly to keep up to date with any changes.

How changes are made to This Addendum?

- The contact details for AECI Australia Pty Ltd are:

  Address: Level 4, 10 Eagle St, Brisbane , Queensland, 4000

  Email: Information.Office@aeciworld.com

How can you contact AECI Australia Pty Ltd?