



GOLD FIELDS LIMITED  
and related entities (Company)

## **Information Manual Guiding Access to and Protection of Information**

Prepared in terms of the Companies Act, 71 of 2008, Promotion of Access to Information Act, 2 of 2000 and the Protection of Personal Information Act, 4 of 2013 (as amended)

Revision Date: 14/06/2024

## CONTENT

---

1.	ACRONYMS AND ABBREVIATION	3
2.	PURPOSE OF THE MANUAL	4
3.	KEY CONTACT DETAILS	4
4.	A REQUESTOR'S GUIDE ON HOW TO USE THIS MANUAL	5
5.	CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO MAKE A PAIA REQUEST	5
6.	DESCRIPTION OF THE RECORDS OF GOLD FIELDS WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION	6
7.	DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS	7
8.	PROCESSING OF PERSONAL INFORMATION	8
9.	AVAILABILITY OF THE MANUAL	10
10.	UPDATES TO THE MANUAL	10
11.	REQUEST PROCEDURE AND NOTIFICATION	10
12.	PUBLICATION	111
13.	PRESCRIBED FORM	11

## 1. ACRONYMS AND ABBREVIATIONS

---

CSDP	Central Securities Depository Participant
ESG	Environmental, Social and Governance
GFL	Gold Fields Limited
PAIA	Promotion of Access to Information Act No. 2 of 2000
POPIA	Protection of Personal Information Act No.4 of 2013
Related Entities	South Deep Joint Venture (an unincorporated joint venture between Gold Fields Operations Pty Ltd and GFI Joint Venture Holdings Pty Ltd); Gold Fields Group Services Pty Ltd (GFGS)
SENS	Stock Exchange News Service (for the Johannesburg Stock Exchange)

## 2. PURPOSE OF THE MANUAL

---

The Manual's purpose is to create a referencing framework for information and records held by the Company, and the Related Entities, as required by PAIA. Referencing has the intent to -

- check the categories of records held by the Company which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- know the description of the records of the Company which are available in accordance with any other legislation;
- access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist a requestor with the records a person intends to access;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- know if the Company will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- know if the Company has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 3. KEY CONTACT DETAILS

---

### 3.1 Information Officer

The Gold Fields Limited Chief Executive Officer's Information Officer duties and responsibilities have been designated to –

Name: Xelia van Rooyen  
Entity(ies): Gold Fields Group Services Pty Ltd  
South Deep Joint Venture  
Designation: Managing Counsel  
Telephone +27 11 411 1074  
Email: [Information.Officer\\_CO@goldfields.com](mailto:Information.Officer_CO@goldfields.com) (Gold Fields Group Services)  
[Information.Officer\\_ZA\\_SD@goldfields.com](mailto:Information.Officer_ZA_SD@goldfields.com) (South Deep JV)

### 3.2 Deputy Information Officer(s)

Name: Sheinaaz Moosa  
Entity(ies): Gold Fields Group Services Pty Ltd  
South Deep Joint Venture  
Designation: Senior Paralegal and Compliance Specialist  
Telephone +27 11 562 9700  
Email: [Information.Officer\\_CO@goldfields.com](mailto:Information.Officer_CO@goldfields.com) (Gold Fields Group Services)  
[Information.Officer\\_ZA\\_SD@goldfields.com](mailto:Information.Officer_ZA_SD@goldfields.com) (South Deep JV)

### 3.3 Address Details

Details	Head Office	South Deep Joint Venture
Postal	Gold Fields Group Services Pty Ltd Postnet Suite 252 Private Bag X30500 Houghton, 2041	South Deep Gold Mine PO Box 57 Westonaria 1870
Physical	150 Helen Road Sandton 2196	Farm Modderfontein Old Vereeniging Road / R28 Westonaria 1870
Telephone	+27 11 562 9700	+27 11 411 1600
Website	<a href="http://www.goldfields.com">www.goldfields.com</a>	<a href="http://www.goldfields.com">www.goldfields.com</a>

## 4. A REQUESTOR'S GUIDE ON HOW TO USE THIS MANUAL

PAIA grants a requestor access to certain information and records of public and private bodies, on the basis that the information or record is required for the exercise or protection of the rights of the requestor.

The Information Regulator's Guide on how to use PAIA can be inspected or copied by members of the public from the offices of public or private bodies, including the office of the Regulator, during normal working hours.

The Company has adopted the outline of the Guide into this Information Manual, which contains the following:

- the objects of PAIA and POPIA
- the postal and street address, phone number and electronic mail address of the Information Officer and Deputy Information Officer designated under section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for access to a record of a private body contemplated in section 50;
- the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal; a complaint to the Regulator; and an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a Manual, and how to obtain access to a Manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively; and
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and the regulations made in terms of section 92.

## 5. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of Record	Available	
		on Website	upon request
Investor and Media	Financial Reports (Quarterly Results, Integrated Annual Report, Climate Change Report, Governance Report, etc.)	Yes	Yes

Category of records	Types of Record	Available	
		on Website	upon request
	Presentations and webcasts	<a href="https://www.goldfields.com/2022-annual-report-suite.php">https://www.goldfields.com/2022-annual-report-suite.php</a>	Yes
	Media Information & SENS Announcements		Yes
	Shareholder Information		Yes
Securities	GFL Securities Register (formerly the Register of Shareholders)	No. Available at the offices of Gold Fields Limited	Yes
Board Governance	Board members, details, committees, and charters.	Yes <a href="https://www.goldfields.com/2022-annual-report-suite.php">https://www.goldfields.com/2022-annual-report-suite.php</a>	Yes
Registration Documentation	Memorandum of Incorporation	Yes <a href="https://www.goldfields.com/standards-and-principles.php">https://www.goldfields.com/standards-and-principles.php</a>	Yes
Sustainability Reporting	Policies, Guidelines and Standards	Yes	Yes
	Performance and Reporting	<a href="https://www.goldfields.com/sustainability-reporting.php">https://www.goldfields.com/sustainability-reporting.php</a>	Yes
	ESG Targets		Yes
	Key Stakeholder Engagement Activities		Yes

## 6. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Records are kept in accordance with, and are available in terms of, certain legislation that applies to the Company, and the Related Entities. These records may in certain instances only be accessed by the persons specified in the relevant legislation. This legislation includes, but is not limited to:

Category of Records	Applicable Legislation
	<b>Environmental</b>
<ul style="list-style-type: none"> <li>Assessment and Monitoring Records</li> <li>Environmental Impact Assessments</li> <li>Guidelines</li> <li>ISO Certification</li> <li>Permits &amp; Licensing</li> <li>Policies</li> <li>Reports (Climate Change Report; Report to Stakeholders)</li> <li>Schedules</li> <li>Standard Operating Procedures</li> </ul>	<ul style="list-style-type: none"> <li>Carbon Tax Act 15 of 2019</li> <li>National Environmental Management 107 of 1998</li> <li>National Environmental Management: Air Quality 39 of 2004</li> <li>National Environmental Management: Biodiversity Act 10 of 2004</li> <li>National Environmental Management: Waste Act 59 of 2008</li> <li>National Nuclear Regulator Act 47 of 1999</li> <li>National Water Act 36 of 1998</li> </ul>
	<b>Finance</b>
<ul style="list-style-type: none"> <li>Guidelines</li> <li>Policies</li> <li>Reports (Annual Financial Statements)</li> <li>Statutory Returns</li> </ul>	<ul style="list-style-type: none"> <li>Income Tax Act 58 of 1962</li> <li>National Credit Act 34 of 2005</li> <li>Pension Funds Act 24 of 1956</li> <li>Skills Development Levies Act 9 of 1999</li> <li>Value-Added Tax Act 89 of 1991</li> <li>Unemployment Insurance Contributions Act 4 of 2002</li> </ul>

	<b>Governance</b>
<ul style="list-style-type: none"> <li>• Board Charters</li> <li>• Code of Conduct</li> <li>• Forms</li> <li>• Guidelines</li> <li>• Intellectual Property (Patents; Title Deeds)</li> <li>• King IV Governance Reports</li> <li>• Memorandum and Articles of Association</li> <li>• Policies</li> <li>• Registration Certificate(s)</li> <li>• Reports (Integrated Annual Report; Governance Report)</li> <li>• SENS Announcements</li> <li>• Share and Directors Registers</li> </ul>	<ul style="list-style-type: none"> <li>• Companies Act 71 of 2008</li> <li>• Competition Act 98 of 1978</li> <li>• Financial Intelligence Centre Act 38 of 2001</li> <li>• Financial Markets Act 19 of 2012</li> <li>• Mineral and Petroleum Resources Development Act 28 of 2002</li> <li>• Precious Metals Act 37 of 2005</li> <li>• Promotion of Access to Information Act 2 of 2000</li> <li>• Protected Disclosures Act 26 of 2000</li> <li>• Protection of Personal Information Act 4 of 2013</li> <li>• Securities Services Act 36 of 2004</li> </ul>
	<b>Health &amp; Safety</b>
<ul style="list-style-type: none"> <li>• Guidelines</li> <li>• ISO Certification</li> <li>• Policies</li> <li>• Regulator Reports</li> <li>• Schedules</li> <li>• Standard Operating Procedures</li> </ul>	<ul style="list-style-type: none"> <li>• Compensation for Occupational Injuries and Diseases Act 130 of 1993</li> <li>• Explosives Act 15 of 2003</li> <li>• Hazardous Substances Act 15 of 1973</li> <li>• Mine Health and Safety Act 29 of 1996</li> <li>• Occupational Health and Safety Act 85 of 1993</li> </ul>
	<b>Human Resources</b>
<ul style="list-style-type: none"> <li>• Employee Information</li> <li>• Guidelines</li> <li>• Plans (Employment Equity Plan)</li> <li>• Policies &amp; Codes</li> <li>• Schedules</li> <li>• Standard Operating Procedures</li> <li>• Statutory Returns</li> </ul>	<ul style="list-style-type: none"> <li>• Basic Conditions of Employment Act 75 of 1997</li> <li>• Employment Equity Act 55 of 1998</li> <li>• Labour Relations Act 66 of 1995</li> <li>• Skills Development Act 97 of 1998</li> <li>• Skills Development Levies Act 9 of 1999</li> <li>• Pension Funds Act 24 of 1956</li> <li>• Unemployment Insurance Act 63 of 2001</li> </ul>
	<b>Information Technology</b>
<ul style="list-style-type: none"> <li>• Guidelines</li> <li>• Information Technology Charter</li> <li>• ISO Certification</li> <li>• Policies</li> <li>• Regulator Reports</li> </ul>	<ul style="list-style-type: none"> <li>• Cybercrimes Act 19 of 2020</li> <li>• Electronic Communications and Transactions Act 25 of 2002</li> </ul>

## **7. DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS**

The Company's Corporate Office operates a Central Records Department which holds records in relation to the Company and the Related Entities. A description of the subjects on which the Company holds information / records and the categories of records held on each subject, which may be requested in accordance with PAIA and/or POPIA is set out below.

Information and records are not automatically available, and access is subject to the nature of the information requested, as well as any applicable grounds for refusal set out in PAIA.

Subjects on which the body holds records	Categories of records
Corporate Affairs	<ul style="list-style-type: none"> <li>• Database of current and past institutional investors</li> <li>• Media database</li> <li>• Company newspaper records</li> </ul>
Mineral Rights	<ul style="list-style-type: none"> <li>• Geographical and related information</li> <li>• Mineral and Mining Rights</li> <li>• Mining authorisations (licences and permits)</li> <li>• Mining Works Programme (MWP)</li> <li>• Social and Labour Plan</li> <li>• General Permits:</li> </ul>
Mineral Resources	<ul style="list-style-type: none"> <li>• Mineral Resource and Reserve Reports</li> <li>• Geological and other Information</li> </ul>
Procurement	<ul style="list-style-type: none"> <li>• Policies and procedures</li> </ul>
Secretariat	<ul style="list-style-type: none"> <li>• Memoranda of Incorporation</li> <li>• Equity structure details</li> <li>• Statutory compliance records and manuals</li> <li>• Notices, circulars, and minutes of general meetings</li> <li>• Share certificates and transfer forms</li> <li>• Offshore stock exchanges</li> <li>• Dividend declarations and announcements</li> <li>• American depositary receipts programme</li> <li>• Records concerning Directors and Officers</li> </ul>

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing

Gold Fields processes the personal information of its various stakeholders for the following purposes:

- **Workforce:** Gold Fields processes employees' and contractor employees' personal information for purposes relating to their employment or provision of services at Gold Fields, for performing obligations required of an employer and for other purposes permitted by applicable law.
- **Service Providers:** Gold Fields processes service provider information for the purposes of performing its obligations imposed by contracts and legislation.
- **Shareholders / Communities / Other:** Gold Fields processes information to protect the legitimate interest of these parties as well as to meet legislative obligations.

### 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Category of Data Subjects	Personal Information that may be processed
Workforce	<ul style="list-style-type: none"> <li>• Name and contact details</li> <li>• Identity number and identity documents including passports</li> <li>• Employment history and references</li> <li>• Employee number</li> <li>• Banking and financial details</li> <li>• Details of payments to third parties (deductions from salary)</li> <li>• Employment contracts</li> <li>• Employment equity plans</li> <li>• Health and Medical records</li> <li>• Marital status</li> <li>• Postal and/or street address</li> <li>• Title</li> <li>• Medical aid records</li> <li>• Pension fund records</li> <li>• Remuneration/salary records</li> <li>• Performance appraisals</li> <li>• Disciplinary records</li> <li>• Leave records</li> <li>• Training records</li> <li>• Qualifications</li> <li>• Parental status</li> <li>• Biometrics</li> <li>• Disability status</li> <li>• Criminal records</li> <li>• Contact numbers and/or e-mail address</li> <li>• Ethnic group</li> <li>• Age</li> <li>• Gender</li> <li>• Nationality</li> <li>• Language</li> <li>• Financial information</li> <li>• Identity or passport number</li> <li>• Browsing habits and click patterns on Gold Fields group websites</li> </ul>



Category of Data Subjects	Personal Information that may be processed
Service Providers	<ul style="list-style-type: none"> <li>• Name and contact details</li> <li>• Identity and/or company information</li> <li>• directors' Information</li> <li>• Banking and financial information</li> <li>• Information about products or services</li> <li>• Other information not specified but reasonably required to be processed for business operations (last one refers to stuff such as Dow Jones report)</li> </ul>
Shareholders	<ul style="list-style-type: none"> <li>• Names</li> <li>• Shareholding</li> <li>• CSDP/ Nominee</li> <li>• Postal and / Physical Address</li> <li>• Occupation</li> <li>• Price paid for shares</li> </ul>
Third Parties	<ul style="list-style-type: none"> <li>• Names</li> <li>• Physical and / or Postal Addresses</li> <li>• Contact Details</li> <li>• Other information not specified but reasonably required to be processed for business operations</li> </ul>

### 8.3 The recipients or categories of recipients to whom the personal information may be supplied

Recipients or Categories of Recipients to whom the personal information may be supplied	Category of Personal Information
Regulatory Authorities	Employee / contracted employee personal information, service provider data, shareholder, community, and other third-party information as required by law, or protecting the legitimate interest of both the data subject and the Company
Service Providers	Workforce-related and other Service Provider data enabling the service provider to execute on contracted services

### 8.4 Planned transborder flows of personal information

Gold Fields may, only when necessary and with prior consent use service providers that are located outside South Africa to store personal information in a safe and secure manner, or process information for reasons recorded in the Company's Group Data Protection and Privacy Policy Statement.

### 8.5 General Description of Information Security Measures that have been implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information

#### Security Measures & Confidentiality

Gold Fields prioritises cybersecurity, acknowledging the rising risk implications of digital technology. As cybercriminals now target vital operations, data, and infrastructure, Gold Fields continuously evolves its defences to confront an array of threats, including identity theft, corporate espionage, and disruption of control systems.

To adapt to the dynamic threat landscape, Gold Fields' strategy includes regular risk evaluation, adoption of advanced technology, policy and framework formulation aligned with industry standards, continuous staff training, robust incident response and recovery planning, regulatory compliance, and ongoing security posture refinement.

Gold Fields' cybersecurity approach is informed by global incidents, vulnerability assessments, and threat intelligence. This has led to key implementations: automated vulnerability identification via various platforms, Global Attack Surface Monitoring, cybersecurity audits, ISO 27001- 2013 certification, integration of the Critical Security Control Gap Assessment, network security review against the FCAPS Framework, enhancements to the Global Security Operations Center (SOC) and the adoption of numerous internal information technology policies and Compliance processes and frameworks.

#### Availability & Integrity

A data subject may:

- request Gold Fields 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;
- at any time and on reasonable grounds, object to the processing of personal information by Gold Fields unless such processing is required in terms of legislation;
- request GF to delete or correct personal information that is in Gold Field's possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully;
- request Gold Fields destroy or delete a record of personal information that Gold Fields is no longer authorised to retain in terms of POPIA's retention and restriction of records provisions.

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 follow the request procedure outlined in section 11 and submit a request to the Information Officer via delivery at the physical address or electronic mail address set out in section 3.

## **9. AVAILABILITY OF THE MANUAL**

---

A copy of this Manual or the updated version thereof, is available -

- on the Company Website.
- at the Head Office of Company for public inspection during normal business hours.
- to any person upon request and upon the payment of a reasonable prescribed fee.
- to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in the PAIA Regulations, will be payable.

## **10. UPDATES TO THE MANUAL**

---

Gold Fields will, if necessary, update and publish this Manual annually.

## **11. REQUEST PROCEDURE AND NOTIFICATION**

---

### **11.1 Request procedure**

Every request for access to information and records must contain the information set out herein and must substantially correspond with the Prescribed Form, as published in the PAIA Regulations (refer to section 13). A request must be made to the Company, per the disclosed key contact details, and should specify the description of the record concerned.

The Information Officer has delegated authority to receive and co-ordinate formal requests for access to information and records in terms of the Act. The requestor must use the Prescribed Form to make the request for access to a record.

The following must be included:

- Sufficient detail on the record required to enable the Company to identify the record and the requestor.
- Proof of formal identification of the requestor.
- Indicate which form of access is required.
- Indicate the preferred form of reply and state the relevant particulars.

- Identify the right that is sought to be exercised or to be protected and provide an explanation as to why the requested record is required for the exercise or protection of that right.
- If a request is made on behalf of a person, submit proof of the capacity in which the requestor is making the request to the satisfaction of the head of the Company.
- Specify a postal address or contact details in South Africa, or an email address.

The completed Prescribed Form need to be submitted to the Information Officer, per the contact details recorded in section 3.

The request for access to information and records will be deemed to have been made once the Prescribed Form has been received by the Company.

### **11.2 Fees**

The Information Officer must notify the requestor by notice, requiring the requestor to pay the request fee before further processing of the request.

If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that had exceeded the prescribed hours to search and prepare the record for disclosure.

A list of the applicable fees is available in the PAIA Regulations, as amended.

### **11.3 Remedies for refusal**

There is no formal internal appeal process in the Company, and the Information Officer's decision is therefore final.

If the request for information and records is refused, and the requestor is not satisfied with the decision made by Information Officer of the Company, the requestor may submit a complaint to the Information Regulator, or apply to court for relief, within 180 days of receiving the decision that has caused the grievance.

### **11.4 Notification**

The Company is required to inform a requestor in writing of its decision in relation to a request for information and records within 30 days of receiving the completed Prescribed Form and can be extended under defined circumstances.

If the requestor wishes to be informed of the Company's decision in another manner as well, this must be set out in the request and the relevant details included to allow the Company to inform the requestor in the preferred manner.

## **12. PUBLICATION**

---

The Manual has been based on an original template supplied by the SAHRC and amended accordingly based on a template supplied by the Information Regulator, specifically for a private body.

The published version of the Manual will also be referenced and applied as the latest approved and applicable version.

## **13. PRESCRIBED FORM**

---

The Prescribed Form can be downloaded [here](#), or is also available from the Information Officer. Once completed follow the request procedure referenced in section 7.