Declaration by the Company secretary

I hereby confirm that AECI Limited has lodged with the Registrar of Companies all such returns in respect of the year under review, as are required of a public company, in terms of the Companies Act, No. 61 of 1973, as amended, and that all such returns are, to the best of my knowledge and belief, true, correct and up-to-date.

Alma Kennedy
Company secretary
Woodmead, Sandton

31 March 2009