



RUNWAY PROPERTY GROUP LIMITED

("The Company")

REGISTRATION NUMBER 2019/547292/06

PROMOTION OF ACCESS TO INFORMATION MANUAL

**Prepared in terms of section 51 of the Promotion of
Access to Information Act 2 of 2000 (as amended)**

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Promotion of Access to Information Manual (Manual) for Runway Property Group Limited (Registration Number 2019/547292/06) and all its subsidiaries, divisions, associated Companies and related entities (individually and collectively referred to herein as “the Group” or “the Company”) as prepared in accordance with section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA/the Act”) incorporating the provisions of the Protection of Personal Information Act, 2013 (“POPIA”).

1.	INTRODUCTION AND PURPOSE
1.1	PAIA gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State, as well as information held by another person (or private body) when such privately held information is required for the exercise and protection of rights.
1.2	PAIA aims to underline the importance of access to information by fostering a culture of transparency and accountability. PAIA does this by requiring public and private bodies to create both a manual describing the type of records they hold and procedures for others to access that information. Where a request is made in terms of PAIA, the body to which the request is made is obliged to give access to the requested information, except where the Act expressly provides that the information may or must not be released.
1.3	Protection of Personal Information Act (POPIA) promotes the protection of personal information processed by public and private bodies giving effect to everyone's Constitutional right to privacy. POPIA includes certain conditions to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA.
1.4	This Manual aims to facilitate the requests for access to records from the group as contemplated under PAIA, as amended by POPIA.
1.5	This manual will help you get to understand the information we hold and how to access it if necessary. We are required in terms of PAIA to make this manual available to you so you can see what type of information we have, as well as how you can request to get access to it.
2.	COMPANY OVERVIEW
2.1	Our business began as two separate property portfolios, one run by the Cendrowski Family since 1998 and the other run by the Marks Family since 2000. In 2009, the Cendrowski and Marks Families joined forces to create a new property portfolio which would be predominantly retail based. Over the years, the business has evolved, through acquisition and redevelopment, into a predominantly family-run quality income-generating South African property business with 28 properties, which have primarily long-term leases at market-related rentals and a diverse tenant base.

3.	GROUP STRUCTURE
3.1	Please refer to Group structure in Schedule 1 which lists entities making up the Group to which this Manual applies.
4.	CONTACT DETAILS OF THE COMPANY [Section 51 (1) (a)]
4.1	Name of Company: Runway Property Group (Pty) Ltd
4.2	Physical address: Office Park, 22 Stirrup Lane, Woodmead, Gauteng, 2190.
4.3	Postal address: PO Box 653636, Benmore, Gauteng, 2010.
4.4	Head of Body: Mr Earle Marks (Chief Executive Officer)
4.5	Contact Number: 0861999118
4.6	Email address: info@runwaypropertygroup.co.za
5.	INFORMATION REGULATORS GUIDE [Section 51(1)(b)]
5.1	An Official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. Copies of the updated Guide are available from the Information Regulator (established in terms of POPIA) and the South African Human Rights Commission. Any enquiries regarding the Guide should be directed to:
5.1.1	The Information Regulator (South Africa)
	33 Hooft Street, Forum III, 3 rd floor Braampark, Braamfontein Johannesburg
	Tel: +27(0) 10 023 5207
	E-mail: info@justice.gov.za
	Website: https://www.justice.gov.za/infoereg/
	or
5.1.2	The South African Human Rights Commission
	PAIA Unit (the Research and Documentation Department)
	Postal address: Private Bag 2700, Houghton, 2041
	Telephone: +27 11 484-8300
	Fax: +27 11 484-7146
	Website: www.sahrc.org.za
	E-mail: PAIA@sahrc.org.za
6.	AVAILABILITY OF RECORDS IN TERMS OF OTHER LEGISLATION [Section 51(1)(d)]
6.1	A requester is not obliged to request access to information held by the company in terms of the Act, should there be other legislation that provides a requester with access to such a record held by the company. Take note that such other legislation (only to the extent that the relevant legislation is applicable and which therefore makes disclosure of records compulsory) may include: - Auditing Professions Act No. 26 of 2005; - Basic Conditions of Employment, No. 75 of 1997; - Broad-based Black Economic Empowerment Act, No. 53 of 2003; - Companies Act, No. 761 of 2008; - Consumer Protection Act, No 68 of 2008; - Compensation for Occupational Injuries and Diseases Act No. 130 of 1993;

	- Competition Act, No. 89 of 1998; - Copyright Act, No. 98 of 1978; - Electronic Communications and Transactions Act, No 25 of 2002; - Employment Equity Act, No. 55 of 1998; - Employment Services Act, No. 4 of 2014; - Financial Advisory and Intermediary Services Act, No.37 of 2002; - Financial Intelligence Centre Act, No. 38 of 2001; - General and Further Education and Training Quality Assurance Act, No.58 of 2001; - Hazardous Substances Act, No. 15 of 1973; - Higher Education Act 101 of 1997; - Income Tax Act, No. 95 of 1967; - Immigration Act No. 13 of 2002; - International Financial Reporting Standards; - King Code of Governance for South Africa, 2009 (KingIV); - Labour Relations Act, No. 66 of 1995; - Medical Schemes Act, No. 131 of 1998; - Medicines and Related Substances Act, No.15 of 1973; - Mine Health and Safety Act No. 29 of 1996; - National Credit Act No 34 of 2005; - National Environment Management Act, No. 107 of 1998; - National Health Act, No. 61 of 2003; - Occupational Health and Safety Act No. 85 of 1993; - Pension Funds Act No. 24 of 1956; - Prevention and combatting of Corrupt Activities Act, No. 12 of 2004; - Prevention of Organised Crime Act, No.121 of 1998; - Promotion of Access to Information Act No. 2 of 2000; - Promotion of Equality and Prevention of Unfair Discrimination Act, No.4 of 2000; - Protected Disclosure Act No. 26 of 2000 - Protection of Personal Information Act, No. 4 of 2013; - Qualifications Framework Act No. 67 of 2008; - Regulation of Interception of Communications and Provision of Communication-Related Information Act, No70 of 2002; - Skills Development Act, No 97 of 1998; - Skills Development Levies Act, No. 9 of 1999; - Tax Administration Act No. 28 of 2011; - Tax on Retirement Funds Act, No. 38 of 1996; - Trade Marks Act, No. 194 of 1993 - Unemployment Insurance Contributions Act, No. 4 of 2002;
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	- Unemployment Insurance Act, No. 63 of 2001; and - Value Added Tax Act No. 89 of 1991.
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7.	ACCESS TO RECORDS HELD BY THE COMPANY
7.1	Automatic disclosures, i.e., information that is freely available [Section 51(1)(c)]
7.1.1	No notice has been published in terms of section 52 (2) of PAIA. However, the B-BBEE Certificate is available on the Company's website.
7.1.2	Take note that if such notice is published, the only fee payable for access to such information will be the prescribed fee for the reproduction of such information requested.
7.2	Information that may be requested [Section 51(1)(e)]
7.2.1	Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All-access requests will be evaluated on a case-by-case basis, in accordance with the provisions of PAIA.
7.2.2	<u>Companies Act records</u>
	- Documents of incorporation - Memorandum of Incorporation - Minutes of Board of Directors meetings - Records relating to the appointment of directors/auditor/secretary/public officer and other officers - Share Register and other statutory registers
7.2.3	<u>Financial records</u>
	- Annual Financial Statements - Tax Returns - Accounting Records - Banking Records - Electronic banking records - Asset Register - Rental Agreements - Invoices
7.2.4	<u>Income tax records</u>
	- PAYE Records - Documents issued to employees for income tax purposes - Records of payments made to SARS on behalf of employees - All other statutory compliances: - VAT - Regional Service Levies - Skills Development Levies UIF - Workmen's Compensation
7.2.5	<u>Personnel documents and records</u>
	- Employment contracts - Employment Equity Plan (if applicable)

	- Medical Aid Records - Pension Fund records - Disciplinary records - Salary records - SETA records - Disciplinary code - Leave records - Training records - Training manuals
7.2.6	<u>Operational information</u>
	- Such information is required for the day to day running of the company and include but is not limited to company policies, employee records, permits, licenses, authorisations, approvals and general “housekeeping” information. - Procurement Policies - Governance risk and compliance documents.
7.2.7	<u>Communications</u>
	This includes correspondence between people inside and outside of the Company.

8.	PRESCRIBED FEES
7.1	The following fees are prescribed by Annexure B of the PAIA Regulations (GG 45057, GoN 757, 27 Aug 2021), and payable on reproduction of a record if the request is granted as contemplated in Regulation 4, 5, or 7. If the search exceeds 6 hours, a 33% deposit is payable and access to records may be withheld until the deposit is paid by the requester.

The request fee payable by every request	R140.00
For every B&W photocopy of an A4-size page	R2.00 per page or part thereof
For every printed copy of an A4-size page held on a computer or in electronic or machine-readable form	R2.00 per page or part thereof
For a copy in a computer-readable form on	
Compact disc	R 40.00 (if provided by requestor) R 60.00 (if provided by company)
USB thumb drive	R 40.00 (to be provided by requestor)
For a transcription of visual images per A4-size page	Actual costs (service to be outsourced. Will depend on quotation from the transcription service provider)
Copy of visual images	
Transcription of an audio records, per A4-size page	R24.00
Copy of an audio record	
Compact disc	R 40.00 (if provided by requestor) R 60.00 (if provided by company)
USB thumb drive	R 40.00 (to be provided by requestor)

To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00 (to not exceed a total cost of R435.00)
Deposit: (If search exceeds 6 hours)	1/3 of the amount per request calculated in terms of the above.
Postage, e-mail or any other electronic transfer:	Actual costs, if any

FORM 2
REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		

Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i>)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS	
(Mark the applicable box with an "X")	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	
MANNER OF ACCESS	
(Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	
PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name and surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

SCHEDULE 1

ENTITY	CONTACT PERSON / DESIGNATION	EMAIL ADDRESS
Runway Property Group Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za
Linden Square Shopping Centre (Pty) Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za
New Heights 224 (Pty) Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za
New Heights 267 (Pty) Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za
Reflect-All 1025 (Pty) Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za
Stand 278 Strijdom Park (Pty) Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za
Tensing Trading (Pty) Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za
Thistledown Properties (Pty) Ltd	Mr Earle Marks (Chief Executive Officer)	earle@exceedprops.co.za