

**PROMOTION OF ACCESS TO INFORMATION ACT,  
ACT 2 OF 2000 (“The Act”)**

**MANUAL IN TERMS OF SECTION 51 OF THE ACT  
FOR  
OCTODEC INVESTMENTS LIMITED**

**INTRODUCTION**

Octodec Investments Limited (“Octodec”) is a real estate investment trust (REIT) and is included in the two main JSE property indices and has the most significant residential property portfolio among the REITs listed on the JSE. Octodec is a property owner with investments in the residential, commercial, industrial and retail market segments of the Tshwane and Johannesburg CBDs and surrounding areas. Octodec offers living, working, socialising, eating and shopping spaces aimed at an emerging middle class, government, retailers and small entrepreneurs. Octodec has appointed City Property Administration Proprietary Limited as property and asset manager for Octodec’s property portfolio.

The directors of the company are: S Wapnick (Chairman), DP Cohen, GH Kemp, MZ Pollack, AK Stein PJ Strydom and JP Wapnick.

**PARTICULARS IN TERMS OF SECTION 51 OF THE ACT**

*The reference, in the Manual, to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.*

**1. Contact Details [Section 51(1)(a)]**

Name of Company:	Octodec Investments Limited
Designated Information Officer:	Anthony Stein <a href="mailto:anthony@cityprop.co.za">anthony@cityprop.co.za</a>
Postal Address:	PO Box 15, Pretoria, 0001
Physical Address:	CPA House, 101 Du Toit Street, Pretoria, 0002
Telephone Number:	012 319 8781
Fax Number:	086 647 1598
Website:	<a href="http://www.octodec.co.za">www.octodec.co.za</a>
General Enquiries:	<a href="mailto:info@octodec.co.za">info@octodec.co.za</a>

**2. Guide referred to in Section 10 of the Act [Section 51(1)(b)]**

A guide has been compiled in terms of Section 10 of the Act by the Human Rights Commission. It contains information required by a person wishing to exercise any right contemplated by the Act. It is available in all of the official languages.

The guide is available for inspection, *inter alia*, at the office of the Human Rights Commission situated at 29 Princess of Wales Terrace, corner York and St. Andrews Street, Parktown and on its website at [www.sahrc.org.za](http://www.sahrc.org.za).

Please direct any queries to:

*The South African Human Rights Commission*

*PAIA Unit: Research and Documentation Department*

*Postal Address: Private Bag 2700, Houghton, 2041*

*Telephone: 011 484 8300*

*Fax: 011 484 0582*

*Website: [www.sahrc.org.za](http://www.sahrc.org.za)*

*Email: [paia@sahrc.org.za](mailto:paia@sahrc.org.za)*

**3. Records of Octodec Investments Limited which are available without a person having to request access in terms of the Act [Section 51(1)(c)]**

Octodec Investments Limited is not obliged to publish a notice in terms of Section 52(2) of the Act and to date has not elected to do so.

Octodec Investments Limited however does make certain information freely available to the public in various brochures, press releases, publications and on its website at [www.octodec.co.za](http://www.octodec.co.za). Certain information is also made available to employees of Octodec Investments Limited, which is not generally made available to the public. To avoid confusion, these items are not listed here but may be obtained by Octodec Investments Limited employees from the information officer.

**4. Records available in terms of other legislation [Section 51(1)(d)]**

Records available in terms of other legislation are as follows:

- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Basic Conditions of Employment Act 75 of 1997
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Companies Act 71 of 2008
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991
- Income Tax Act 58 of 1962
- Skills Development Act 9 of 1999

- Copyright Act 98 of 1978
- Finance Act 35 of 2000
- Financial Services Board Act 97 of 1990
- Intellectual Properties Laws Amendments Act 38 of 1997
- Pension Funds Act 24 of 1956
- Regional Services Councils Act 109 of 1985
- Stock Exchange Control Act 1 of 1985
- Tax on Retirement Funds Act 38 of 1996
- Trade Marks Act 194 of 1993
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Usury Act 73 of 1968

## **5. Subjects and Categories of Records Held by Octodec Investments Limited [Section 51(1)(e)]**

Octodec Investments Limited maintains records on the following categories and subject matters. However, 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 requests for access will be evaluated on a case by case basis in accordance with the provisions of the Act. In particular, there may be applicable grounds of refusal of such a request, as set out in the Act.

### **5.1 Companies Act 71 of 2008 records**

- Documents of Incorporation
- Memoranda of Incorporation
- Minutes of Board of Directors meetings
- Minutes of meetings of the Sub-Committees of the Board
- Round robin resolutions adopted by the Board of Directors
- Round robin resolutions adopted by the Sub-Committees of the Board
- Records relating to the appointment of directors/auditors/secretary/public officer and other officers
- Share Register and other statutory registers
- Company Policies and Procedures
- Compliance Reports
- Trademarks
- Licences
- Internal correspondence

### **5.2 Financial Records**

- Annual Financial Statements
- Tax Returns
- Accounting Records
- Banking Records, Bank Statements, Paid Cheques, Electronic Banking Records
- Asset Register

- Rental Agreements
- Invoices
- Management Accounts

### 5.3 Income Tax Records

- 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 Services Levies
  - Skills Development Levies
  - UIF
  - Workmen's Compensation

### 5.4 Personnel Documents and Records

- Employment Contracts
- Employment Equity Reports
- Staff Recruitment Policies
- Remuneration Records and Policies
- Skills Development Reports
- Disciplinary Policy, Procedures and Records
- Medical Aid Records
- Pension Fund Records
- Leave Records
- Training Records and Manuals

### 5.5 Operations Records

- Sales Records
- Service Records
- Management Agreements
- Lease Agreements
- Service Provider Contracts
- Management Reports

## 6. **Detail on how to make a request for access [Section 51(e)]**

Requests for access to records held by Octodec Investments Limited must be made on the prescribed Form C and submitted to the information officer at the address, fax number or electronic mail address provided.

On the prescribed Form C, the requester must provide sufficient detail to enable the Information Officer to identify the record(s) and the requester. The requester should also indicate which form of access is required and indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

It is vital that the requester identifies the right that he or she is seeking to exercise or protect and provide an explanation on why the requested record is required for the exercise or protection of that right.

If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the information officer.

If a requester does not use the standard prescribed Form C, the request may be rejected for lack of procedural compliance, refused (if sufficient information is not provided, or otherwise) or delayed.

Please note that the requester is required to pay the prescribed request fee, which fee must be paid with submission of the completed Form C.

Kindly note that all requests to Octodec Investments Limited will be evaluated and considered in accordance with the Act. Publication of this manual and describing the information held by Octodec Investments Limited does not give rise to any rights to access such information or records, except in terms of the Act.

**7. Updating of the manual [Section 51(2)]**

Octodec Investments Limited will on a regular basis update this manual, if necessary, and publish the revised manual.

**8. Availability of the Manual [Section 51(3)]**

This manual is available for inspection at CPA House, 101 Du Toit Street, Pretoria.

This manual is available free of charge.

This manual is to be handed to the South African Human Rights Commission (SAHRC).

This manual is to be made available on the website of Octodec Investments Limited at [www.octodec.co.za](http://www.octodec.co.za).