



**FRONTIER ACCOUNTING AND SECRETARIAL SERVICES PROPRIETARY LIMITED ("FRONTIER")**

**REGISTRATION NUMBER 2009/015299/07**

**MANUAL**

**in terms of**

**Section 51 of**

**the Promotion of Access to Information Act 2/2000**

**(the "ACT")**

**And to address the requirements of the Protection of Personal Information Act, 2013**

UPDATED: JUNE 2026

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**Introduction.**

Frontier Accounting and Secretarial Services (Pty) Limited (“Frontier”) is a wholly owned subsidiary of Nova PropGrow Group Holdings Limited (“Nova Group”) and was specifically created in 2011 to perform the functions of a Secretarial Services Provider for the Nova Group.

These functions are –

- the providing of Administrative/Accounting and Secretarial functions to the Nova Group and its Debenture Holders and Shareholders; and
- the providing of Property Administrative related services on behalf of the Nova Group, pertaining to the Management and Administration of the various properties owned by the Nova Group, in support of its in-house Property Management Company, Centroprop.

**1. Company Contact Details [Section 51 (1) (a)]****Persons designated /duly authorised persons**

Directors:

D Haese (Managing Director) MJ

Osterloh (Director)

**Head of the Organisation for the purposes of the Act**

Dominique Haese (Managing Director) is the CEO of the company and has delegated the responsibility of Information Officer to Danie van der Merwe, who for the purposes of this brochure will be called the information officer.

**Postal and Street address of Information Officer**

<b>Postal Address:</b>	<b>Physical Address:</b>
Postnet Suite 0070	Menlyn Corporate Park
Private Bag X4	Block C 3 <sup>rd</sup> Floor
Menlo Park	Waterkloof Glen
0102	

**Contact numbers for Information officer:**

Tel: +27 12 425 5000

**Electronic mail address of the Information officer:** [danie@frontieram.co.za](mailto:danie@frontieram.co.za)

**Website:** <http://www.frontieram.co.za>

**2. The South African Human Rights Commission(SAHRC) guide to the Act in terms of section 10(1)[Section 51(1)(b)]**

The Promotion of Access to Information Act ("the Act") grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest

Requests in terms of the Act shall be made in accordance with the prescribed procedures at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

The Act requires the South African Human Rights Commission ("SAHRC") to compile a guide in terms of section 10(1) of the Act. This guide is to help people understand the provisions of the Act, its objects and how to make use of the provisions in the Act.

The Guide was compiled by the Commission specifically to assist the requester to access records and exercise his/her right to information. An update of this Guide will be published within 2 years from the publication of this copy.

The Guide is available from the SAHRC. The contact details of the SAHRC are as follows:

Private Bag 2700  
Houghton  
2041

Tel: +27 011 484 8300  
Fax: +27011 484 0582

Website: [www.sahrc.org.za](http://www.sahrc.org.za)  
E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

## [Section 51 (1) (c)]

### 3. Applicable Legislation

Ser	Ref	Act
1	No57 of 1997	Basic Conditions of Employment Act
2	No 71 of 2008	Companies Act
3	No 55 of 1998	Employment Equity Act
4	No 58 of 1962	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 85 of 1993	Occupational Health and Safety Act
7	No 2 of 2000	Public Access to Information Act
8	No 9 of 1999	Skills Development Levy Act
9	No 30 of 1966	Unemployment Insurance Act
10	No 89 of 1991	Value Added Tax Act
11	No 38 of 2001	Financial Intelligence Centre Act
12	No 4 of 2013	Protection of Personal Information Act
13	No 25 of 2002	Electronic Communication and Transaction Act

14	No 130 of 1993	Compensation for Occupational Injuries and Diseases Act
15	No 24 of 1936	Insolvency Act
16	No 8 of 2011	Sectional Titles Schemes Management Act
17	No 28 of 2011	Tax Administration Act
18	No 40 of 1949	Transfer Duty Act
19	NO 26 of 2007	Securities Transfer Tax Administration Act

#### 4. Schedule of Records kept by Frontier in terms of legislation [Section 51 (1) (d)]

Frontier 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.

Records	Subject
Public Affairs	Media Releases Correspondence with external parties Communiqués to Share Creditors and Debenture Creditors
Financial	Annual financial statements Tax returns Accounting records Banking records <ul style="list-style-type: none"> <li>- Bank statements</li> <li>- Electronic banking records</li> </ul> Asset register Rental agreements Invoices Income Tax records <ul style="list-style-type: none"> <li>- PAYE records</li> <li>- IRP5/IT3 documents issued to employees</li> <li>- Records of payments made to SARS on behalf of employees</li> </ul> All other statutory compliances iro <ul style="list-style-type: none"> <li>- VAT</li> <li>- Skills development Levies</li> <li>- UIF</li> <li>- Workmen's Compensation</li> </ul>
Personnel records	Employment contracts Employment Equity Plan (currently exempt) Medical Aid records Disciplinary records SETA records Salary records Leave records Training records

Companies Act records	Documents of incorporation Memoranda of incorporation Minutes of Board meetings Records relating to the appointment of directors/auditors/secretary

## 5. Availability of this Manual

A copy of this Manual is available by sending a request for a copy to the Information Officer by e mail. The Manual may also be obtained from the South African Human Rights Commission ("SAHRC") at the addresses set out above. This Manual will be updated annually.

## 6. Access To Records Held by The Company

6.1 Records held by the Company may be accessed on request only once the requirements for access have been met. A requester is any person making a request for access to a record of the Company and in this regard, the Act distinguishes between two types of requesters:

6.1.1 Personal Requester. A personal requester is a requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of the Act and applicable law, the Company will provide the requested information, or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested will be charged by the Company.

6.1.2 Other Requester. This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, the Company is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act. The prescribed fee for reproduction of the information requested will be charged by the Company.

### 6.2 Request Procedure.

A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record. A requester must complete the prescribed form enclosed herewith and submit same the information officer at the postal or physical address, fax number or electronic mail address stated herein. This form is also available on the website of SAHRC [www.sahrc.org.za](http://www.sahrc.org.za). The prescribed form must be filled in with enough particularity to at least enable the information officer to identify:

- The record or records requested;
- The identity of the requester;

- What form of access is required; and
- The postal address or fax number of the requester.

A requester must state that he or she requires the information to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must also provide an explanation of why the requested record is required for the exercise or protection of that right.

The Company will process a request within 30 days, unless the requestor has stated special reasons which would satisfy the information officer that circumstances dictate that this time not be complied with.

The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the manner and the particulars so required. 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 an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the information officer.

Decision. The Company will, within 30 days of receipt of a request, decide whether to grant or decline a request and give notice with reasons (if required) to that effect. The 30-day period within which the Company must decide whether to grant or refuse a request, may be extended for a further period of not more than 30 days if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company (other than the head office) and the information cannot reasonably be obtained within the original 30-day period. The information officer will notify the requester in writing should an extension be necessary

## 6. **Grounds for Refusal of Access to Records.**

Please note that there are various grounds upon which your request for access to a record of a Private Body must and/or may be refused. These grounds for refusal are as stated and described in part 4 of the section 10 Guide in terms of the Promotion to Access to Information Act.

## 7. **Remedies Available.** If Request for Information Is Refused.

**7.1 Internal Remedies.** The Company does not have internal appeal procedures. As such, the decision made by the information officer pertaining to a request is final, and requestors will have to exercise such external remedies at their disposal if a request is refused, and the requestor is not satisfied with the response provided by the information officer.

**7.2 External Remedies.** A requestor that is dissatisfied with the information officer's refusal to disclose information, may, within 30 days of notification of the decision, apply to a court for relief. Likewise, a third party dissatisfied with the information officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to a court for relief. For purposes of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

## 8. **Prescribed Fees** (See attached Annexure)

The head of the private body to whom the request is made will notify you in writing to pay the prescribed request fee, if any, before processing the request. If you require access to records of your personal information, you do not have to pay a request fee (s 22(1)).

The fee structure is also available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at [www.sahrc.org.za](http://www.sahrc.org.za).

Please note the following:

- A requester is required to pay the prescribed fees (R50,00) before a request will be processed.
- If the preparation of the record/s requested requires more than the prescribed hours (six), a deposit shall be paid of not more than one third of the access fee which would be payable if the request were granted.
- A requester may lodge an application with a court against the payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.

## 9. **Other Information**

This company strives to be a leader in its industry in all fields, including its practical subscription to the guiding principles in our Constitution such as transparency and the free flow of information. Should you have any queries regarding the use of this manual, please do not hesitate to contact the information officer or myself.

(Signed)

Dominique Haese

**Managing Director**

FRONTIER ACCOUNTING AND SECRETARIAL SERVICES PROPRIETARY LIMITED

## FEES IN RESPECT OF PRIVATE BODIES

- The head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request. A personal requester does not pay such a fee [s 22(1)].
- The fee that the requester must pay to a private body is R50. The requester may lodge an internal appeal or an application to the court against the tender or payment of the request fee [s 22(3)(b)].
- The head of the private body will then decide on the request and notify the requester in the required form
- If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 22(6)]

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.

2. The fees for reproduction referred to in regulation 11(1) are as follows:

(a) For every photocopy of an A4-size page or part thereof	R1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
(c) For a copy in a computer-readable form on -	
(ii) compact disc	R70,00
(d) For a transcription of visual images,	
(i) for an A4-size page or part thereof	R40,00
(ii) For a copy of visual images	R60,00
(e) For a transcription of an audio record	
(i) for an A4-size page or part thereof	R20,00
(ii) for a copy of an audio record	R30,00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.

(1)(a) For every photocopy of an A4-size page or part thereof	R1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
(c) For a copy in a computer-readable form on -	
(ii) compact disc	R70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R40,00
(ii) For a copy of visual images	R60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	R20,00
(ii) For a copy of an audio record	R30,00
(f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	

(2) For purposes of section 54(2) of the Act, the following applies:

(a) Six hours as the hours to be exceeded before a deposit is payable; and

(b) One third of the access fee is payable as a deposit by the requester.

(3) The actual postage is payable when a copy of a record must be posted to a requester.