



**ATLANTIC
CAPITAL**

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

ATLANTIC CAPITAL PARTNERS (PTY) LTD
(the "Company")

Company registration number: 2020/053033/07

Manual in terms of the Promotion of Access to Information Act 2 of 2000
(the "ACT")

April 2025



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1. INTRODUCTION

Atlantic Capital Partners (Pty) Ltd (hereinafter "Atlantic Capital") is a licensed financial services provider with FSP 54530 that offers financial services to investors and business owners who want to sell their businesses or make acquisitions of businesses, including the raising of capital. Atlantic Capital also offers traditional investment services, financial planning and tax planning as well as property investment services as a fully-fledged property brokerage company. Atlantic Capital holds a Fidelity Fund Certificate in its capacity as a business and commercial property practitioner and is registered with the Property Practitioners Regulatory Authority (PPRA), operates a Trust Account and is an Accountable Institution with the FIC (FIC ID: 56375).

2. COMPANY CONTACT DETAILS (Section 51(1)(a))

All requests for information in terms of this manual must be directed to Atlantic Capital's authorized persons:

Director: Mr LPL Lawson

Postal Address: Touchstone House 11FL, 7 Bree Street, 8000, Cape Town.

Street Address: Touchstone House 11FL, 7 Bree Street, 8000, Cape Town.

Telephone Number: +27-21-140-6780

Email: info@acp.co.za

Website: www.acp.co.za

3. APPLICABLE LEGISLATION

3.1) The Companies Act

3.2) Copyright Act

3.3) Employment Equity Act

3.4) Income Tax Act

3.5) Labour Relations Act

3.6) Value Added Tax Act

3.7) Estate Agency Affairs Act



- 3.8) Basic Conditions of Employment Act
- 3.9) Occupational Injuries and Diseases Act
- 3.10) Electronic Communications and Transactions Act
- 3.11) Promotion of Access to Information Act
- 3.12) Unemployment Insurance Act
- 3.13) Financial Advisory and Intermediary Services Act
- 3.14) Financial Intelligence Centre Act
- 3.15) Protection of Personal Information Act
- 3.16) Financial Intelligence Centre (FIC) Act
- 3.17) Trust Properties Control Act
- 3.18) The Estate Duty Act
- 3.19) Financial Sector Regulation Act
- 3.20) Prevention and Combatting of Corrupt Activities Act
- 3.21) Property Practitioners Act
- 3.22) The Financial Advisory and Intermediary Services Act

4. ACCESS TO RECORDS (Section 51(1)(b))

- 4.1) The Promotion of Access to Information Act ("PAIA"), grants a requester access to certain records of a private body if the said records are required to exercise or protect any rights of the requester. Should a public body lodge such a request, it must be acting in the public interest.
- 4.2) Any request for information in terms of PAIA must be made in accordance with the prescribed form and manner, at the rates provided. The prescribed form and manner and the tariff are dealt with in sections 6 and 7.
- 4.3) The South African Human Rights Commission ("SAHRC") has compiled and published a useful guide in terms of section 10 of PAIA, containing valuable information for the purposes of exercising any right in terms of PAIA.

4.4) The guide is made available in all official languages on the website of the SAHRC at the following URL: <https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>

4.5) The contact details of the SAHRC are as follows:

Postal Address: Private Bag 2700, Houghton, 2041

Telephone Number: 011 877 3600

Fax Number: 011 403 0625

Website: www.sahrc.org.za

5. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (Section 51(1)(c))

All records kept and made available in terms of legislation applicable to Atlantic Capital's and the financial services industry in general, as it applies to the specific environment in which Atlantic Capital operates, are available in accordance with the said legislation.

6. SCHEDULE OF RECORDS (Section 51 (1)(d))

6.1) Records that are available without having to submit a request in terms of PAIA:

6.1.1) Marketing material

6.1.2) Pamphlets

6.2) Records that must be requested in terms of PAIA:

6.2.1) Personal Records

6.2.1.1) Any personal records provided to Atlantic Capital by its personnel;

6.2.1.2) Any records a third party has provided to Atlantic Capital about any of its personnel;

6.2.1.3) Conditions of employment and other personnel-related contractual and quasi-legal records;

6.2.1.4) Internal evaluation records; and

6.2.1.5) Other internal records and correspondence.

6.2.2) Client-related records

6.2.2.1) Any records a client has provided to a third party acting for or on behalf of Atlantic Capital;

6.2.2.2) Any records a third party has provided to Atlantic Capital; and

6.2.2.3) Records generated by or within Atlantic Capital pertaining to the client, including transactional records.

6.2.3) Company Records

6.2.3.1) Operational records;

6.2.3.2) Memorandum of Incorporation;

6.2.3.3) Information technology;

6.2.3.4) Marketing records;

6.2.3.5) Minutes of Board of Directors Meetings;

6.2.3.6) Records relating to appointment of directors/auditors/secretary/public officer;

6.2.3.7) Statutory records;

6.2.3.8) Internal policies and procedures;

6.2.3.9) Treasury-related records; and

6.2.3.10) Share Register and other statutory registers

6.2.4) Financial Records

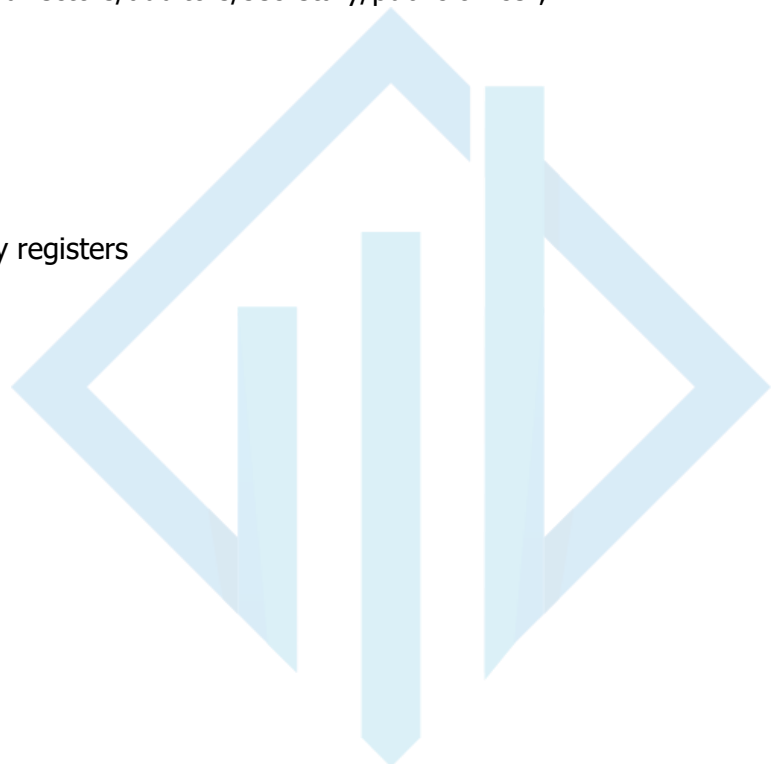
6.2.4.1) Annual Financial Statements;

6.2.4.2) Tax Returns;

6.2.4.2) Asset register;

6.2.4.2) Invoices;

6.2.4.2) Accounting Records; and



6.2.4.2) Banking Records.

7. FORM OF A REQUEST FOR INFORMATION (Section 51(1)(e))

- 7.1) A requester must use the prescribed Form C (available for download on the Department of Justice and Constitutional Development ("DOJ") website) to request access to the information as per 5.2. above.
- 7.2) Form C can be downloaded from the following URL: http://www.justice.gov.za/forms/form_paia.htm
- 7.3) The request must be addressed to Atlantic Capital's Legal and Compliance Department, as per the contact details set out in section 2.
- 7.4) The requester must provide sufficient detail on Form C to enable Atlantic Capital to establish who is requesting the said information as well as what information is being requested and in what format.
- 7.5) The requester must provide sufficient detail in respect of his/her contact details and if the requester wishes to be informed of the decision of Atlantic Capital in any specific manner (in addition to written) the manner and particulars thereof.
- 7.6) Lastly, the right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- 7.7) After Atlantic Capital has decided on the request, the requester must be notified in the required form.
- 7.8) 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 hour to search and prepare the record for disclosure.

8. PRESCRIBED FEES (Section 51(1)(f))

- 8.1) A requester who seeks access to a record containing personal information about that requester is not required to pay a request fee.
- 8.2) Every other requester, who is not a personal requester, must pay the required request fee, as prescribed from time to time.



8.3) If the preparation of the record 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 requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.

8.4) Records may be withheld until the fees have been paid.

8.5) The fees can be downloaded from the following URL:

<https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

9. AVAILABILITY OF THE MANUAL (Section 51(3))

9.1) This manual is available for inspection at Atlantic Capital's offices free of charge upon prior arrangement.

9.2) A copy is also made available on Atlantic Capital's website.

Lance Lawson

Director (CEO)

Date: 6 April 2024

