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**ACCESS TO INFORMATION MANUAL OF IMBEWU SUSTAINABILITY LEGAL SPECIALISTS (PTY) LTD  
IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 ("PAIA")**

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**1. INTRODUCTION TO IMBEWU SUSTAINABILITY LEGAL SPECIALISTS (PTY) LTD ("IMBEWU")**

- 1.1 IMBEWU is a Johannesburg based legal sustainability specialist consulting firm.
- 1.2 Catherine Warburton, the managing director of IMBEWU, has been duly appointed as the Information Officer for IMBEWU and is the person to whom requests for access to information must be made in terms of PAIA and in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA").

**2. IMBEWU CONTACT DETAILS**

Name of body:	IMBEWU Sustainability Legal Specialists (Pty) Ltd
Director and appointed Information Officer:	Ms Catherine Warburton
Address:	53 Dudley Road, Corner Bolton Avenue, Parkwood, 2193, Johannesburg
Postal address:	As per physical address
Telephone:	(011) 214 0660
E-mail:	<a href="mailto:admin@imbewu.co.za">admin@imbewu.co.za</a>
Website:	<a href="http://www.imbewu.co.za">www.imbewu.co.za</a>

**3. GUIDE ON HOW TO USE PAIA**

- 3.1. The South African Human Rights Commission (SAHRC) compiled a guide on how to use PAIA ("the Guide"). From 1 July 2021, the Information Regulator assumed the functions of the SAHRC. Accordingly, the Information Regulator has in terms of section 10(1) of PAIA updated and made available the Guide compiled by the SAHRC, in an easily comprehensible form and manner as may be reasonably required by a person who wishes to exercise any right contemplated by PAIA and POPIA. The Guide is available for inspection at the offices of the Information Regulator and on its website (<https://info regulator.org.za/>). A copy of the guide can also be accessed via this link – [SAHRC PAIA Guide](#).

A copy of the Guide is also available for inspection at IMBEWU's office in Parkwood, Johannesburg during normal working hours. The Guide can also be obtained upon request to the Information Officer. Any queries regarding the Guide must be directed to the Information Regulator on the following details:

**Information Regulator:**

Physical address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone Number:	010 023 5200
Website:	<a href="https://inforegulator.org.za/">https://inforegulator.org.za/</a>
Email (complaints):	<a href="mailto:PAIAComplaints.IR@justice.gov.za">PAIAComplaints.IR@justice.gov.za</a>
Email (general enquiries):	<a href="mailto:enquiries@inforegulator.org.za">enquiries@inforegulator.org.za</a>

#### **4. RECORDS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST**

Records made available by IMBEWU without a person having to request access in terms of PAIA:

##### **4.1. Publicly available information about IMBEWU:**

- 4.1.1. the IMBEWU websites including contact details, areas of expertise and publications;
- 4.1.2. B-BBEE affidavit; and
- 4.1.3. Privacy Policy.

#### **5. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION**

Records maintained by IMBEWU in terms of other legislation include but are not limited to the:

- 5.1. Basic Conditions of Employment Act 75 of 1997;
- 5.2. Broad-Based Black Economic Empowerment Act 53 of 2003;
- 5.3. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- 5.4. Electronic Communications and Transactions Act 25 of 2002;
- 5.5. Employment Equity Act 55 of 1998;
- 5.6. Income Tax Act 58 of 1962;
- 5.7. Labour Relations Act 66 of 1995;
- 5.8. Occupational Health and Safety Act 85 of 1993;
- 5.9. Promotion of Access to Information Act 2 of 2000;
- 5.10. Protection of Personal Information Act 4 of 2013;
- 5.11. Skills Development Act 97 of 1998; 4
- 5.12. Unemployment Insurance Contributions Act 4 of 2002;
- 5.13. Unemployment Insurance Act 30 of 1996; and
- 5.14. Value Added Tax Act 89 of 1991.

#### **6. SUBJECTS AND CATEGORIES OF INFORMATION HELD BY IMBEWU**

The subjects and categories of records held by IMBEWU are as follows:

**Note:** *This section of the Manual sets out the subject and categories of records held by IMBEWU. The inclusion of any subject or category of records should not be taken as an indication that records falling within those subjects and/or categories will be made available under PAIA. In particular, certain grounds of refusal set out in PAIA may be applicable to a request for such records.*

All client documents and employee records are protected as personal information of third parties in terms of the POPIA.

##### **6.1. IMBEWU Company documents**

- 6.1.1. Proof of registration as a private company.

##### **6.2. Financial records of IMBEWU**

- 6.2.1. Accounting records, books and documents of IMBEWU
- 6.2.2. Annual financial reports of IMBEWU.
- 6.2.3. Details of auditors of IMBEWU.
- 6.2.4. Invoices in respect of both creditors and debtors of IMBEWU.

- 6.2.5. Tax returns of IMBEWU including Vat returns.
- 6.2.6. Other financial records of IMBEWU.

### **6.3. Banking details of IMBEWU**

- 6.3.1. Bank facilities and accounts details.
- 6.3.2. Bank statements.
- 6.3.3. Financial commitments of IMBEWU.
- 6.3.4. Other banking records.

### **6.4. Human resources / employment records**

- 6.4.1. List of employees.
- 6.4.2. Contracts of employment with employees of IMBEWU.
- 6.4.3. Personnel files in respect of each employee of IMBEWU.
- 6.4.4. Disciplinary records and documentation pertaining to disciplinary proceedings and performance reviews.
- 6.4.5. Tax information of employees.
- 6.4.6. Employee policies and procedures.
- 6.4.7. Other information relating to employees of IMBEWU.

### **6.5. Intellectual Property**

- 6.5.1. Trade-marks, copyrights and designs.
- 6.5.2. Records relating to domain names and logos.
- 6.5.3. Licences relating to intellectual property rights.
- 6.5.4. Other agreements relating to intellectual property rights.

### **6.6. Information pertaining to clients of IMBEWU.**

- 6.6.1. Agreements with IMBEWU clients.
- 6.6.2. Agreements with third party service providers, specifically in relation to the Online Safety, Health & Environmental (SHE) Legal Register platform used by IMBEWU clients.
- 6.6.3. Documentation and other information received from clients, including company policies and procedures, site locations and other confidential documents required to prepare a customised legal register.
- 6.6.4. Documentation and other information received from third parties.
- 6.6.5. Correspondence with clients.
- 6.6.6. Correspondence with third parties.
- 6.6.7. Research conducted on behalf of clients of IMBEWU.
- 6.6.8. Other information relating to, or held on behalf of, clients of IMBEWU.

### **6.7. Library and know how information**

- 6.7.1. Newsletters.
- 6.7.2. Publications.
- 6.7.3. Other information held by the library of IMBEWU.

### **6.8. Immovable and movable property**

- 6.8.1. Credit sale agreements and/or hire purchase agreements.
- 6.8.2. Other agreements for the purchase, ordinary sale, conditional sale or hire of assets and services.

## **6.9. Information technology**

- 6.9.1. Computer software, support and maintenance agreements.
- 6.9.2. Other documentation pertaining to computer systems and computer programmes.

## **6.10. Website**

- 6.10.1. Information contained on our website: [www.imbewu.co.za](http://www.imbewu.co.za) including:
  - 6.10.1.1. Areas of expertise;
  - 6.10.1.2. Publications
  - 6.10.1.3. Privacy Policy.

## **6.11. Other agreements**

- 6.11.1. Suretyship agreements.
- 6.11.2. Marketing agreements.
- 6.11.3. Agreements with suppliers.
- 6.11.4. Confidentiality and/or non-disclosure agreements.
- 6.11.5. Any other relevant agreements.

## **6.12. Correspondence**

Correspondence of IMBEWU, including internal and external memoranda.

# **7. DESCRIPTION OF PERSONAL INFORMATION PROCESSING IN TERMS OF POPIA**

IMBEWU processes personal information in accordance with its Privacy Policy, available on our website: [www.imbewu.co.za](http://www.imbewu.co.za).

# **8. THE REQUEST PROCEDURE IN TERMS OF PAIA**

- 8.1. A request for access to a record in terms of PAIA must substantially correspond with Form 2 of Annexure A to the Regulations Relating to the Promotion of Access to Information Act, 2021 (please refer to **Annexure A** attached, alternatively, access the request form on <https://info regulator.org.za/paia-forms/>). The request must be made to the Information Officer. This request must be made to the address or electronic mail address of the Information Officer.
- 8.2. The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required. The requester should also indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.
- 8.3. The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation as to why the requested record is required for the exercise or protection of that right.
- 8.4. If a request is made on behalf of a person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

## **9. FEES**

- 9.1. The Information Officer must notify the requester (other than a personal requester) by notice, requiring the requester to pay the relevant fee before further processing the request. A personal requester does not pay such fee.
- 9.2. The requester may lodge an application to the court against the tender or payment of the request fee.
- 9.3. The Information Officer will then make a decision on the request and notify the requester in the required form.
- 9.4. If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that had exceeded the prescribed hours to search and prepare the record for disclosure.

## **10. AVAILABILITY OF THIS MANUAL**

The manual is available for inspection at our office in Johannesburg free of charge. A copy is also accessible on the IMBEWU website, [www.imbewu.co.za](http://www.imbewu.co.za).

## **11. PRESCRIBED FEES AND FORMS IN RESPECT OF PRIVATE BODIES**

The prescribed fees for requests to private bodies are set out in Annexure B to the Regulations Relating to the Promotion of Access to Information Act, 2021.

## **12. UPDATES TO THE MANUAL**

This Manual may be amended and updated from time to time, provided that if IMBEWU does so, it will ensure that such changes are carried out subject to and published in accordance with PAIA and POPIA.

### **Approved by:**



Catherine Warburton

Managing Director

Date: 18/09/2025

Last amended on 17 September 2025

**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		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><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></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center"><b>TYPE OF RECORD</b> (Mark the applicable box with an "X")</p>			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
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			

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
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	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
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>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <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**

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**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**