

Health and Safety Policy	
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<p>Summary</p> <p>Health and Safety lies at the heart of our Company values and ambitions. The purpose of this policy is to detail our Health & Safety Statement, explain the Health and Safety management structure within the Company and define formal requirements and responsibilities for embedding Health and Safety into our management processes.</p>	
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Originator: Israr Ahmad 	
Approved and Authorised by: Iftikhar Ahmad (Chief Executive Officer) 	Distribution: Master File 1 Staff Induction File Assignment Pack

HEALTH AND SAFETY POLICY

1. HEALTH & SAFETY POLICY STATEMENT

This is the Health & Safety Policy Statement of Vigilant Security Services (UK) Ltd. Our statement of general policy is:

- To provide adequate control of the health and safety risks arising from our work activities.
- To consult with our employees on matters affecting their health and safety.
- To provide and maintain safe equipment.
- To ensure safe handling and the use of substances.
- To provide information, instruction and supervision for our employees.
- To ensure all employees are competent to do their tasks and to give them adequate training.
- To prevent accidents and cases of work-related ill health.
- To maintain safe and healthy working conditions.
- To revise and review this policy as necessary at regular intervals.

2. EMPLOYER RESPONSIBILITIES

Overall and final responsibility for Health & Safety within Vigilant Security Services (UK) Ltd is that of the Managing Director. Day to day responsibility for ensuring this policy is put into practice is delegated to the Operations Manager. To ensure Health & Safety standards are maintained and improved, the following people have responsibility for the Health & Safety for the departments shown:

- | | | |
|---------------------|--------------------|---------------|
| • Israr Ahmad | Director | London Office |
| • F. Hadi | Operations Manager | London Office |
| • Michael O' Rourke | Managing Director | London Office |

3. EMPLOYEES RESPONSIBILITIES

In order to maintain a safe working environment, it is the responsibility of all employees to:

- Co-operate with supervisors and managers on all Health & Safety matters.
- Not interfere with anything provided to safeguard their Health & Safety.
- Take reasonable care of their own Health & Safety.
- Report all Health & safety concerns to an Appropriate Person as defined in this policy document.

4. RISK ASSESSMENTS

Risk Assessments will be undertaken by:

- Israr Ahmad
- S Khan
- Daren Ward
- Sandra Ormston

The findings of these Risk Assessments will be reported to the Operations Manager who is responsible for authorizing suitable control measures to be implemented effectively and in a timely manner so far as is practicable.

Risk Assessments shall be reviewed annually or sooner if a significant hazard is identified or the work activity changes to warrant an earlier assessment.

All Risk Assessments should be read in conjunction with each individual Site's Assignment Instructions.

5. INVESTIGATION OF HSE CONCERNS

It is imperative that all significant HSE concerns raised by our employees and clients are investigated to ensure our 'Duty of Care' and compliance to HSE legislation and 'Good Practice'. The following system is to be implemented:

- Initial concern received.
- Details promulgated to SMT by recipient **within 12 hours**.

- Operations Manager to propose a suitable Action Plan with defined responsibilities and time-lines within **24 hours**.
- SMT to approve Action Plan within **48 hours**.
- Operations Manager to manage each concern through to its conclusion providing email updates and update briefings to the SMT during Dept Head weekly meetings.
- Details to be retained in individuals 'P File' and electronically by the HR Manager to a degree commensurate with the seriousness of the incident.

6. CONSULTATION WITH EMPLOYEES

Consulting employees on Health and Safety matters is essential in creating and maintaining a safe working environment. It is also a legal requirement as defined in The Health and Safety (Consultation with Employees) Regulations (HSCER) 1996. The Safety Committee will be formed as follows:

Managing Director	Operations Director
Sales Director	Operations Manager

Suitable employees are to be selected by the Senior Management Team to fulfill the role of Company Safety Representative(s). They are to successfully complete the Company Health and Safety Foundation course, display a pro-active approach to Health and Safety and be volunteers for the role. They will be paid their current site rate for the time spent fulfilling their role. The Company Safety Reps are:

- TBA
- TBA

The Safety Committee will sit bi-annually at the London Office and be chaired by the Managing Director. The Operations Manager will contact all Employees prior to meeting, informing them of the meeting date and request details of any issues they would like to have raised at the meeting. The Operations Manager will then produce and distribute an agenda for the meeting. On completion of the Safety Committee the Operations Manager will produce and distribute minutes, detailing respective follow-up action points.

Consultation with Employees is provided by:

- Bi-Annual Safety Committee Meetings, with the Agenda and Minutes cascaded to all employees.
- Direct contact with the Operations Manager and Company Safety Representatives for any Health & Safety concerns.

- Health & Safety Information Sheets with pay statements as required and Web site.

7. SAFE HANDLING AND USE OF SUBSTANCES

Although the staff member would not normally come into contact with any Hazardous substances the staff member must inform VSS of any COSHH substances as soon as they've been discovered or if they have been informed of any substances that have been introduced to their location.

The Risk Assessors are responsible for identifying when a COSHH Assessment is required. The Operations Manager shall complete the COSHH Assessment, ensuring the control measures are implemented effectively and in a timely manner so far as is practicable and making those Employees affected aware of said Risk assessment.

8. INFORMATION, INSTRUCTION AND SUPERVISION

The Health & Safety Law poster is displayed at The London Office. The Operations Manager is responsible for ensuring the details on the poster are current at all times. Health & Safety advice and guidance is available from the Operations Manager. The supervision of new Security Officers will be arranged, undertaken and monitored by:

- Senior Security Officer on site.
- Shift Supervisor.
- Operation Managers.

The Operations Manager is responsible for ensuring our Employees, working at locations under the control of another Employer, are given the relevant Health and Safety information.

9. COMPETENCY FOR TASKS AND TRAINING

The HR Director is responsible for ensuring all new Employees hold an SIA license or have an application in process. The HR Director shall issue License Dispensation Notices (LDN) to all staff 'in process' of application. Task specific training will be identified, arranged and monitored by the Operations Manager. Health and Safety training will be identified, monitored and conducted by the Operations Manager. All learning and development records will be held on the Employees Personal file, maintained by the HR Manager in the London Office.

10. FIRST AID

The First Aid Box is located at the London Office with the Personnel Administrator. The Operations Manager is responsible for checking the contents of the First Aid Kit and its

replenishment as required. The appointed First Aider is Hayley Harwood for The Foundry and Arend Koekemoer for Control. The Operations Manager is to ensure all First Aiders are suitably qualified to First Aid at Work standards and are 'current'.

11. ACCIDENTS

As defined in The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR), Vigilant Security Services (UK) Ltd (VSS) are responsible for the reporting and recording of accidents and near-misses that occur on their property and ensuring that those occurring 'on-site' involving their employees are reported/recorded by the respective client.

11.1 Internal Accident Reporting

All Employees are responsible for reporting all accidents and 'near-misses' through Line Management, if appropriate, through VSS Control, using the Accident/Near-Miss Reporting forms as soon as is practicable, but before the employee finishes their shift. If fax/email facilities are not available 'onsite' then details of the accident/near-miss must be passed to Vigilant Security Services Control by phone by the employee.

The electronic form must be submitted by the respective Ops Manager to the Operations Manager within 72 hours of the accident/near-miss being reported. This must be backed up by a 'hard-copy' signed by the respective employee(s) within 7 days and placed on the employees File.

Vigilant Security Services Control is to ensure all reports are passed to the operations Manager, as soon as is practicable, but not later than 12 hrs of the report (verbal or electronic) being received. The operations team is responsible for ensuring that RIDDOR is adhered to at all times and all accidents/near misses are reported correctly.

All accidents are to be reported to the Client and the Site Accident Book completed ASAP. Accident Books are located in both Control and the London Office for accidents that occur at these respective locations.

11.2 Accident Investigation

The Line Manager is responsible for investigating each accident/near miss, as soon as is practicable, identifying the 'root-cause' of the accident/near-miss and the control measures that need to be implemented to prevent a reoccurrence of the event. They are responsible for annotating the accident/near-miss form accordingly and updating the Operations Manager who will subsequently update the Accident Management Database.

The Operations Manager will investigate any serious accident personally and compile a clear, concise detailed report for the Managing Director.

Should control measures be identified that require implementing then the Operations Manager will obtain all necessary authorities and monitor their implementation, to ensure that they are completed as soon as is practicable, highlighting any delays as necessary.

11.3 Accident Management Database

The Operations Manager is responsible for maintaining an Accident Management Database for all accidents and near-misses that occur involving our employees. The Database will be updated with the following information:

- Place, Date & Time of the accident/near-miss.
- Full details of the Employee(s) involved.
- Full details of the accident/near-miss.
- Witness details.
- Injury caused and First Aid treatment required.
- The Line Manager who investigated the accident/near-miss.
- The 'Root-Cause' of the accident/near-miss.
- Controls put in place to reduce/prevent a reoccurrence.

11.4 External Reporting

The Operations Manager, in accordance with RIDDOR 95, is responsible for reporting the following **work-related incidents** to the appropriate external authority:

- Deaths.
- Major injuries.
- Over 3-day injuries: - where an employee or self-employed person has an accident, and the person is away from work or unable to work normally for more than 3 days.
- Injuries to members of the public where they are taken to hospital.

- Work-related diseases.
- Dangerous Occurrences: - where something happens that does not result in a reportable injury, but which could have done (Near-Miss).

11.5 Document Retention

The HSE Accident Book, the Accident Management Database and a copy of the accident/near-miss report forms is to be retained, both electronically and 'hard-copy', where appropriate, for a minimum of 3 years.

11.6 Communication

Accident Statistics will be reviewed during the Safety Committee Meeting and included in the published minutes for all employees.

12. MONITORING

To check our working conditions, and ensure our safe working practices are being followed we will:

- Regularly complete 'spot-checks' of all sites by the Shift Operational Managers.
- Complete an annual Risk Assessment of each location.
- Maintain our Accident Management System and investigate all Accidents and Near-Misses.

13. EMERGENCY PROCEDURES – FIRE AND EVACUATION

On each Site and at each of the VSS London locations the Landlord(s) shall ensure that the Fire Risk Assessment is undertaken and implemented. Primary escape routes to be checked daily by a member of VSS.

To ensure VSS is compliant under the new 'Regulatory Reform (Fire Safety) Order 2005. The Company must carry out a 'Fire Risk Assessment' of their own premises. i.e. The Foundry – London Head Office.

Fire extinguishers at the Foundry are maintained and checked by the Business Systems Manager of VSS. VSS staff will routinely check these appliances for visual signs of damage reporting any concerns to the Operations Manager or other Senior Management.

The Fire Alarm is tested weekly by the Landlord(s). The Emergency Evacuation will be carried out bi-annually by the Landlord(s).

'Trained' Fire Marshals must be identified to the Landlord and should be identifiable to all Head Office staff.

14. MANUAL HANDLING

The Company, in so far as is reasonably practical shall:

- Ensure all Manual Handling Operations that carry a risk of injury to the participants are, wherever reasonably practicable, avoided by:
 - Removing the need for the operation to be carried out.
 - Automating or mechanising the operation.
 - Ensure that where Manual Handling Operations cannot be avoided, they are assessed by a competent person.
 - Ensure that any person working for, or on behalf of, the Company does not carry out Manual Handling Operations that involve a risk of being injured, unless:
 - They are competent and able to carry out the work.
 - They have received Manual Handling Training from a person competent to give such training.
 - The works have been subject to a Manual Handling Assessment carried out by an competent person, and a safe system of work documented and implemented that reduces the risk of injury to an absolute minimum.
 - They have received information on the load to be carried.
 - Ensure that sufficient competent persons are appointed to carry out assessments of manual handling operations that carry a risk of injury to the participants and cannot be avoided.
 - Provide sufficient information, instruction, and training necessary to:
 - Ensure the health and safety of all employees carrying out Manual Handling Operations that involve a risk of being injured.

- Enable Managers and Supervisors to implement this policy.
- **Where a problem arises involving the manual handling of a load, all employees shall:**
 - Immediately inform their Supervisor Manager.
 - In the case of an adverse health or medical condition, advise the employee's General Practitioner their Supervisor, Manager or the Director responsible for Health & Safety.

15. PERSONAL PROTECTIVE EQUIPMENT

The Company, in so far as is reasonably practicable, shall ensure that any Personal Protective Equipment (PPE) identified as being required, within their risk assessments, will be suitable for the task and shall be issued free of charge to those employees identified as requiring the PPE.

The company shall also ensure that any employee issued with PPE is trained in the risks identified, the correct use of the PPE, storage and maintenance of the PPE and the methods of reporting any loss of damage to the PPE.

Every employee issued with PPE is responsible to insure the PPE within their care is used correctly, that it is maintained in a clean and useable state, that it is stored safely

and that any defect, damage or loss is reported immediately to their supervisor / manager.

16. VIOLENCE

Our employees deal directly with the public and may have to face aggressive or violent behaviour while at work. They may be sworn at, threatened or even attacked. Our responsibilities under Section 2 of The Health and Safety at Work Act 1974 include protecting staff from the risks associated with work-related violence so far as is reasonably practicable.

The Health and Safety Executive's definition of work-related violence is:

'Any incident, in which a person is abused, threatened or assaulted in circumstances relating to their work'.

Verbal abuse and threats are the most common types of incidents. Physical attacks are comparatively rare. Employees whose job requires them to deal with the public can be at risk of violence. Most at risk are those who are engaged in the following types of activity:

Cashiering/handling money or valuables.

- Security.
- Delivery/Collection.
- Representing Authority.
- Work with mentally ill/potentially violent/drugged or drunk persons.
- Service Industries

Aggressive behaviour may be the result of (but is by no means limited to) one or more of the following: Pain, worry, fear, alcohol, drugs, medical conditions, anxiety, frustration, prejudices. Firstly, employees at risk should try to recognise when aggressive behaviour may develop:

Signs that someone may be becoming aggressive:

- Exaggerated slow, very measured speech.
- Loud excited speech.
- Staring eyes.
- Sweating.
- Fidgeting/wringing of the hands.
- Sharp drawing in of breath.
- Finger wagging/jabbing

Actions you can take to help to defuse the situation:

- Remain calm.
- Use gentle, measured calm speech.
- Listen attentively to what the person has to say and show compassion.
- Do not argue and try not to respond until the person has got their frustration out of their system.
- Make eye contact but try not to stare.

- Maintain an open posture – avoid crossed arms, finger wagging or hands on hips.
- Give the person plenty of personal space – try not to crowd them and do not attempt to touch a person who is angry.
- Do not become aggressive yourself.
- Do not turn your back on the person.
- Try to position yourself suitably for an easy escape.

Should you be threatened or physically assaulted:

- Try to escape.
- Raise the alarm – by shouting if necessary.
- Call the police – either yourself, or by getting someone to do it for you.
- Report the matter to your manager as soon as possible

Make a note of what happened, including as much detail as possible – i.e. include:

- Time and date.
- Location of the incident.
- Names and addresses of any witnesses.
- What you were doing at the time of the incident.
- What the outcome was – i.e. injury, verbal abuse, damage to property etc.

All employees must make every effort not to get into situations where there is a potential risk of a violent attack. They should remove themselves from the situation, call for support and make detailed notes of what has and is occurring. Violence is included in all Site Risk Assessments and the appropriate control measures implemented.

A detailed Conflict Management package is included in the Site Assignment Manual to assist our employees which is available on every site.

17. Equipment Safety Requirements

The Company shall maintain in an efficient state, in efficient working order, and in good repair: the Company's premises; equipment and devices, falling within the requirements of the Workplace (Health, Safety and Welfare) Regulations 1992. This equipment, devices and systems shall be subject to a suitable system of maintenance. PAT Testing etc. Records will be maintained and held at Head Office under the control of the Operations Manager.

18. Provision of Staff Welfare Facilities on Site

The Operations Manager is responsible for ensuring that the Company and or the Landlord / Tennant / Occupier / or those responsible for the premises in which our

employees work, complies with its duties to maintain all workplaces, equipment, devices, and systems that comprise the Company's offices. These will include:

- Ventilation.
- Temperature.
- Lighting
- Cleanliness and waste materials.
- Room dimension and space.
- Workstation and seating.
- Conditions of floor and traffic routes.
- Falls and or falling objects.
- Windows and Transparent or Translucent Doors, Gates and Walls.
- Windows, Skylights and Ventilators.
- Ability to Clean Windows etc safely.
- Organisation of Traffic Routes.
- Doors and Gates.
- Sanitary Conveniences.

- Washing facilities.
- Drinking water.
- Facilities for Rest and to Eat Meals.

19. SMOKE FREE POLICY

On the 1st of July 2007, virtually all enclosed public places and workplaces in England became smoke free. It is against the law to smoke in these places.

Places where you can't smoke

Under the new regulations, it is against the law to smoke in:

- pubs, bars and nightclubs
- cafes and restaurants
- membership clubs
- indoor shopping centres
- offices and factories
- public transport
- work vehicles used by more than one person

Indoor smoking rooms are no longer allowed, so anyone who wants to smoke has to go outside.

Penalties and fines

Breaking the smoke free law is a criminal offence. The fixed penalty notices and maximum fine for each offence are:

- smoking in smoke free premises or work vehicles: a fixed penalty notice of £50 (reduced to £30 if paid in 15 days) for the person smoking, or a maximum fine of £200 if prosecuted and convicted by a court
- failure to display no-smoking signs: a fixed penalty notice of £200 (reduced to £150 if paid in 15 days) for whoever manages or occupies the smoke free premises or vehicle, or a maximum fine of £1,000 if prosecuted and convicted by a court.

Local councils are responsible for providing advice and enforcing the smoke free law in England.

Overall responsibility for policy implementation and review rests with the Operations Manager. However, all employees are required under law to adhere to, and support the implementation of this policy. The Operations Manager shall inform all existing employees, contractors and consultants of the policy and their role in the implementation and monitoring of the policy. A copy of this policy shall be displayed

at the London Office, included in each site Assignment Reference Manual and explained on recruitment/induction of all new employees. Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all company vehicles.

Disciplinary / Legal procedures will ensue if an employee does not comply with this policy.

20. DRIVING

VSS is committed to the continual improvement in the driving standards of its employees, with a view to reducing road traffic accidents and improving our environmental performance. VSS are committed to ensuring that we comply with applicable legal and other requirements, to prevent road traffic accidents and to continually improve the standard of driving of personnel, for which this skill represents part of their core function.

The driving performance of these individuals will be reviewed 6-monthly by a suitably qualified member of the management team and the results reviewed by SMT.

All drivers of VSS Vehicles must be fully conversant with Health and Safety aspects of driving including any risk assessments that have been carried out. In addition, they should be aware of risks involved in carrying out procedures not directly involving operation of the vehicle including operation of the jack and vehicle refuelling.

Drivers and vehicles must cover all legal requirements whilst operating. It will remain the individual officer's responsibility to ensure that they are properly licensed to operate the vehicle. They are also to ensure that they always operate the vehicle in line with current legislation and drive in a courteous and responsible manner that reflects well on VSS. VSS management will ensure that all vehicles are road worthy and correctly insured and licensed.

Human Resources will ensure that a photocopy of licences of those personnel whose core business involves driving is obtained and held on their personal file. The licence should be checked against the copy held immediately following their 6-monthly assessment, to record any changes or driving convictions gained in the preceding period.

Our vehicle fleet will be serviced and maintained efficiently and where and when economically viable, the Company will endeavour to run its fleet on diesel fuel. This will be achieved by:

- Daily vehicle checks by the drivers.

- Following the correct vehicle servicing schedule.
- Using diesel fuelled vehicles.

VSS will ensure that the condition of its vehicles reflects positively on the company. Not only will the vehicles be correctly maintained but the cleanliness of vehicles will be a high priority. Regular inspections of the vehicles by management are to include spot checks on vehicle cleanliness and routine maintenance matters such as tyre pressures and oil levels.

Before engaging on their Bi-annual driving assessment in the company of a suitably competent Assessor, drivers will undergo a short 'multi choice' question paper to assess their knowledge of the Highway Code. Answers will be annotated onto the question paper, the results recorded and distributed to the SMT by the OM and the papers placed on the employees HR file. This is **NOT** a pass or fail test but is designed to highlight areas of knowledge that may have been forgotten since passing the driving test, or to reflect current changes to the Highway Code. The OM is responsible for the design and content of the Highway Code question papers which are to be changed after each assessment.

Following the written Highway Code assessment, drivers will be asked to operate the vehicle in a number of different driving environments, including motorway driving. This is **NOT** a test, rather an opportunity for the officer to have his driving skills assessed and ensure that they are of a standard that reflects well on APS and themselves, and is consistent with APS Environmental Policy. This will also be an opportunity for the assessor to offer advice on how to improve their driving technique. The OSM is responsible for designing and updating the 'driving skills assessment' Proforma on which the performance of each assessed employee is to be recorded. This assessment form will be promulgated to the SMT on completion of each assessment; the comments collated with the results of the Highway Code question paper and held on the employees HR file.

The SMT will ensure the availability of resources essential to establish, implement, maintain and improve our vehicle maintenance and cleanliness and assess the driving ability of key personnel. Resources should include specialised skills, organisational infrastructure, media and financial resources.

The Operations Manager is responsible for ensuring the effective communication of driving policy at all levels of the Company's structure by:

- Including this Policy in the Annual Quality Management System Training session.
- Promulgating this Policy to all Head Office employees after its annual review.

- Ensuring an updated copy of this policy is available for all 'Head-Office' employees in the Master Document Files held at The Foundry.
- Receiving, documenting and responding to relevant communication from external interested parties Re; this policy.
- The distribution of bi-annual accident statistics to every employee at the VSS Safety Committee.
- Driver training updates in the Company Newsletter.

The OM is responsible for monitoring trends in traffic accident statistics and ensuring that our vehicles are operating in an environmentally acceptable manner.

The OM is responsible for dealing with actual and potential nonconformity (ies) and for taking corrective and/or preventative action using the Company Service Defects System ensuring the following:

- Identifying and correcting nonconformity (ies) and taking action(s) to mitigate their environmental and health and safety impacts.
- Investigating nonconformity (ies), determining their causes and taking actions in order to avoid their reoccurrence.
- Evaluating their need for action(s) to prevent nonconformity (ies) and implementing appropriate actions designed to avoid their occurrence.
- Recording the result of corrective action(s) taken and reviewing the effectiveness of corrective action(s) and preventative action(s) taken.
- The OM shall investigate all traffic accidents involving company vehicles and submit a report to the SMT. This shall in no way impinge upon any ongoing Police investigation and will be used to assist in training.

21 ANNUAL OBJECTIVES

Our Annual Health & Safety Objectives for 2025/26 are:

- **To ensure 100% of our sites have been Risk Assessed and that this Risk Assessment is reviewed at least annually or sooner if required.**
- **To ensure 100% of all accidents and Near-Misses are reported to the HRD by Control within 12hours.**
- **To hold 2 Safety Committee Meetings each year.**

- **To receive no reports of non-compliance to our ‘Smoke Free’ policy by our Officers during 2025/26.**
- **To ensure at least 4 vehicle 'spot-checks' by Ops Management are completed each period to ensure correct maintenance schedule is being followed for our vehicle fleet.**

The Operations Manager is responsible for recording and reviewing our performance against these objectives and reporting a trend analysis to the SMT each period with recommendations for any preventative or corrective action that may be required.

22 SUMMARY

Vigilant Security Services considers the safety of its Employees as paramount. A positive ‘can-do’ approach to Health and Safety is strongly encouraged from all employees to ensure a Safe Working Environment for all.

23 DOCUMENT REVISION HISTORY

13 th May 2013	Issue 1	Reviewed
13 th May 2014	Issue 2	Reviewed
13 th May 2015	Issue 3	Change to details
13 th May 2016	Issue 4	Change to details sec, 7,9,17 amended.
13 th May 2017	Issue 5	Change to details sec, 13 amended.
13 th May 2018	Issue 6	Changes to job titles
13 th May 2019	Issue 7	Annual Review
13 th May 2020	Issue 8	Annual Review
13 th May 2021	Issue 9	Annual Review
12 th May 2022	Issue 10	Annual Review
12 th May 2023	Issue 11	Annual Review
13 th May 2024	Issue 12	Annual Review
12 th Feb 2025	Issue 13	Change of Logo