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# HEALTH AND SAFETY

## The policy of Electrical Safety UK Ltd

POL-J1-002-1

Document Owner: Rebecca Broadhead

Applies to: All ESUK employees

### DOCUMENT REVIEW

Signed:



Reviewed by: Rebecca Broadhead

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Position: Managing Director

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## 1. INTRODUCTION

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This Health and Safety Policy document has been designed to outline the arrangements in place to ensure health and safety for ESUK Ltd.

The Health and Safety at Work Etc. Act 1974, Chapter 37 and sub-ordinate Regulations places duties on employers to provide a safe and healthy place of work for its employees, it also has duties towards persons not in their employment but who might be affected by the company's undertakings. Employees also have duties placed on them.

This policy sets out the company's policy and arrangements for ensuring legal compliance and is agreed by and supported by the Board of Directors. It is the intention of ESUK to create a safe and healthy work environment and that every employee goes home at the end of their working day in no worse condition than they arrived through the work that they undertake on our behalf and in the areas where we ask that such work is undertaken.

This policy is a legal requirement and compliance with it is mandatory for all. Failure to comply with this policy may result in disciplinary action. Your contract of employment requires that you co-operate with ESUK on matters of health and safety, this policy outlines the minimum acceptable standards which you must consistently exceed. This policy is supported by sub-ordinate policies and procedures as well as support materials that must also be followed.

We aim to be fair and reasonable, and for our requirements to apply with equal formality to both sexes. Should any employee have any difficulty in complying with this policy, for whatever reason, please raise this initially with your line manager, and failing a satisfactory resolution, through the grievance procedure.

It is the duty of everyone at ESUK to inform the company of any errors in this or sub-ordinate documents or in any arrangements put in place for the purpose of health and safety. Furthermore, employees must not undertake work which they believe could place their health or their safety at risk and must report any unsafe condition that they identify in an appropriate and timely manner.

## 2. HEALTH AND SAFETY STATEMENT OF INTENT

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The following is reproduced from POL-J1-001-0

The Board of Directors of ESUK Ltd regards the promotion of Health & Safety measures as a mutual objective for management and employees at all levels.

It is the policy of ESUK Ltd to do all that is reasonably practicable to prevent injury and damage to property and to protect everyone from foreseeable work hazards including the public insofar as they come into contact with the company or its products.

In particular, ESUK has a responsibility:

- to identify hazards arising from the Company's activities and the workplace.
- to eliminate those hazards where possible and to control any which are remaining.
- to provide and maintain safe and healthy working conditions for its employees, taking account of any statutory requirements.
- to review this Policy at least annually for adequacy and continued compliance with current legislation

- to communicate this Policy to all employees and to provide training, information supervision and instruction to enable them to comply with its requirements and to perform their work safely and efficiently.
- to make available all necessary safety devices and protective equipment and to supervise their use.
- to consult with employees on issues relating to Health and Safety.
- to maintain a constant and continuing interest in Health and Safety matters applicable to the Company's activities and for its management to set an example in safe behaviour.
- to take measures to ensure the health and safety of others who may be affected by their activities and processes.
- to monitor the effectiveness of the Safety Policy and make necessary revisions as required.
- to provide the necessary resources to satisfactorily discharge the above responsibilities.

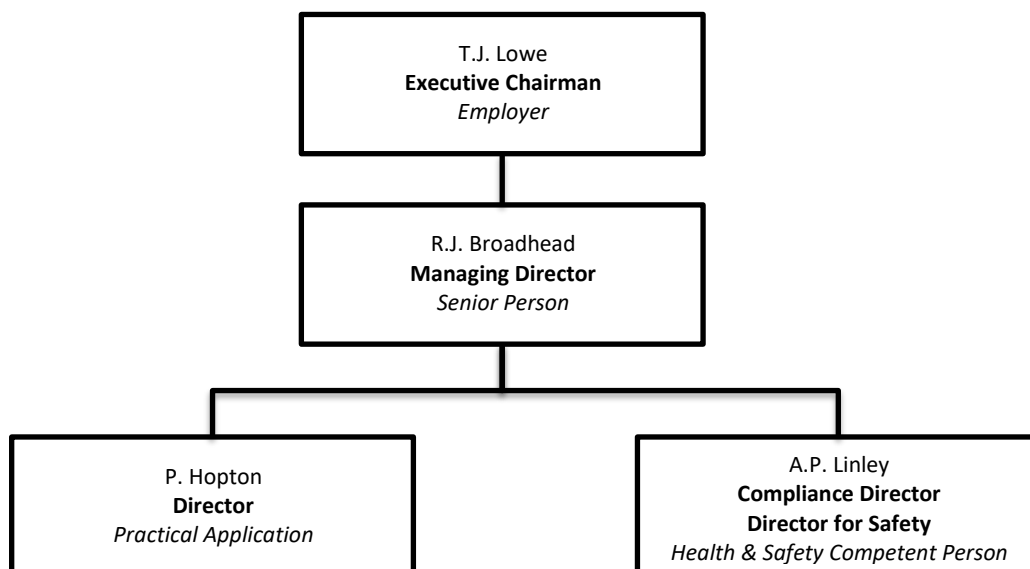
Employees have a duty to co-operate in the operation of this policy:

- by working safely and efficiently in accordance with company procedures jointly agreed on their behalf for securing a safe workplace.
- by using the protective equipment provided, and by meeting statutory obligations.
- by reporting to their supervisors any accidents however trivial and any incidents that could lead to injury or damage.
- by assisting in the investigation of accidents with the object of introducing measures to prevent a recurrence.

This Policy applies to the Companies Head Office activities as well as its activities on Client's premises. This statement of Policy is endorsed by the Managing Director and supported by the Board of Directors.

## 3. HEALTH AND SAFETY ORGANISATION

### 3.1 Management Accountability Structure



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## 3.2 Organisational Hierarchy

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Andrew Linley as Compliance Director of ESUK Ltd has been nominated to ensure that all matters of health and safety are addressed in a timely manner. He takes responsibility for the activities of ESUK Ltd and ensures they are being carried out in accordance with the arrangements detailed in the Health and Safety Policy. Secondly, he reports to the board of director on matters of Health and Safety concerning the Company.

Andrew Linley in his role as Compliance Director provides competent advice on all health and safety issues and works alongside the Managing Director to monitor company health and safety performance and liaise with all staff on a day to day basis to ensure health and safety responsibilities are discharged satisfactorily.

Subcontractors are responsible to the Compliance Director.

On external sites, the project lead will be responsible for co-ordinating matters and will liaise with all visitors to site from inside and outside the organisation.

## 3.3 Organisational Compliance

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A Site Safety Toolbox Talk / Risk Assessment Manual and Safety rules are issued to all employees. Employees are required to acquaint themselves with these documents. Wilful disregard to these safety rules will result in disciplinary action.

Employees having managerial or supervisory duties, must familiarise themselves with the Policy in order to fully understand the nature of their duties and then be able to confirm acceptance of the responsibilities.

## 3.4 Safety Considerations at Recruitment

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Applicants to any of the positions within the organisation will be required to demonstrate their understanding of Health and Safety knowledge appropriate to the job role. If this requirement is not fulfilled an action plan will be put in place to bring the employee to a satisfactory level of compliance.

## 3.5 Monitoring of Safety Performance

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As part of employee performance appraisals, each company member will have their Safety performance reviewed.

Should changes in work methods, safety systems and training policy be indicated, then Corrective and Preventive action will be implemented as part of the Company's Quality procedures.

Similarly, should an employee performance appraisal indicate a safety training need, this will be actioned and endorsed on the employee's individual training plan.

## 3.6 Consultation with Workforce

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The company recognises the duties placed on them by the Health and Safety (Consultation with Workforce) Regulations and seeks to involve employees at all levels in the health and safety issues affecting the company.

Suggestions by employees on ways in which the work could be made safer are welcomed and should be sent to the Compliance Director.

Employees are consulted about Safety matters and any changes to the Safety Policy through training sessions, toolbox talks and Safety information. In addition, provision is in place to interface with any elected Safety Representative nominated by the workforce.

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In developing safe working procedures associated with Risk Assessments and Method Statements for undertakings on site, the persons assigned to complete the documentation will consult with the relevant staff as to the content and the nature of the procedures.

## 3.7 Health and Safety Committee

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For the purpose of developing a positive, proactive and functional health and safety system a health and safety committee shall be convened on a quarterly basis, or more frequently if required for the purpose of:

- reviewing health and safety performance,
- identifying changes in legislation and guidance,
- making recommendations on improvements,

The health and safety committee shall be made up of managers in charge of business units and who are in a position to effect change, advisors who are not part of the senior management structure who are able to make recommendations outside of the confines of board-room decisions and employee safety representatives who are able to communicate between employees and management. Each and every member of the health and safety committee have an important part to play and are equal in importance.

## 4. HEALTH AND SAFETY RESPONSIBILITIES

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### 4.1 The Managing Director

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The Managing Director is responsible for ensuring that:

- a signed current health and safety policy statement of intent is in place,
- a valid health and safety policy has been put in place along with all arrangements,
- competent persons have been engaged for health and safety,
- adequate resources and the time necessary are made available to allow health and safety to be implemented correctly,
- managers and supervisors have been informed of their responsibilities,
- arrangements are in place for the review of health and safety policy, arrangements and that the effectiveness of those policies and arrangements are monitored,
- information, instruction, training and supervision is in place with regards to employees.

This may be achieved through delegation.

### 4.2 The Director for Safety

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The Director for Health and Safety is responsible for:

- ensuring that a suitable and sufficient assessment is made of the Health and Safety risks arising from the companies undertakings, to employees and others not directly employed by the company,
- monitoring changes to Statutory Health and Safety requirements,
- authorising changes arising from the regular review of the Company's Safety Policy,
- review of Accident and Dangerous Occurrence Reports,

- identifying training needs and implementing identified training,
- initiation and monitoring of Preventive action measures resulting from findings and information arising regarding Health and Safety,
- maintenance and development of documentation and data relating to Health and Safety and the monitoring of compliance with same,
- evaluation of Accident and Dangerous Occurrence reports for inclusion in Preventive action activities and review of Risk Assessments and Method Statements,
- familiarising all staff with the contents of the Health and Safety Management System and all relevant Working Documents such as: Risk Assessment Forms, Codes of Practice and Permits,
- ensuring all staff are inducted correctly and receive all the relevant information and documentation,
- ensuring all staff have met the minimum health and safety training standards and monitor existing staff to ensure they meet the minimum standards,
- collation of Health and Safety suggestions Audit of Suppliers and Contractors records of competence and performance in matters relating to Health and Safety,
- assessment and provision of First Aid facilities.

## 4.3 The Compliance Director

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This role may be combined with another health and safety position.

The Compliance Director is responsible for:

- regular review of the Health and Safety Policy, Management System including all working documents such as Risk Assessments and Method Statements,
- planning, documenting and carrying out Site Safety Audits,
- recording findings of Site Safety Audits and collating data for inclusion in Preventive action plans,
- the review of Accident and Dangerous Occurrence Reports,
- familiarising staff with the contents of the Health and Safety Management System and all relevant Working Documents such as: Risk Assessment Forms, Codes of Practice and Permits,
- monitoring all projects to ensure that all health and safety considerations have been addressed,
- liaising with customers on matters of Health and Safety,
- provision of Safety Equipment and Protective Clothing,
- training of Employees in Safety Procedures,
- ensuring all Tools, Plant and Equipment under the company's control are checked and maintained on a systematic basis to ensure compliance with Safety Standards,
- assessment of the Health and Safety competence of subcontractors,
- liaison with Subcontractors on matters of Safety.

## 4.4 All Employees

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All employees have a duty to co-operate in the operation of this policy. They are responsible for:



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- their own safety, that of their work mates and other people in the vicinity of their work or who may be affected by acts or omissions,
- the implementation of the Company's Safety Policy in as much as it affects their own work,
- adhering to company procedures, jointly agreed on their behalf including the provisions of Risk Assessments, for securing a safe workplace,
- using protective equipment provided,
- reporting accidents or dangerous occurrences to their Supervisor,
- assisting in the investigation of accidents with the object of introducing measures to prevent a recurrence,
- reporting to their supervisor incidents that have lead or may lead to injury or damage,
- carrying out visual 'user' inspection of Tools and Equipment that they are using and the reporting of any deficiencies to their supervisor or line manager.

## 4.5 Appointed Subcontractors

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Appointed subcontractors are responsible for:

- Their own safety and that of work mates and other people in the vicinity of his work or who may be affected by their acts or omissions,
- Adherence to the Company's Safety Policy and safe working procedures in as much as they affect the subcontract work,
- Reporting of accidents or dangerous occurrences.

## 5. SPECIFIC ARRANGEMENTS

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The arrangements for implementing the Safety Policy are categorised as follows:

### 5.1 Safe Working Procedures

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The Company Directors will ensure that a suitable assessment of risks associated with the company's normal undertakings is carried out.

Prior to commencing work on site, the Directors will ensure that a site specific assessment of risks associated with the company's site based undertakings is made. Assessments will include those risks identified by third parties such as clients, other contractors and subcontractors.

The Directors will ensure that safe working procedures are developed and implemented, based in the significant findings there from.

Where safe working procedures have been developed it is an employee's duty to read them thoroughly, raise any queries concerning them and comply with any duties placed upon them.

In addition to company issued risk assessments employees shall be required to complete a site specific point of work risk assessment and implement any control measure that has been identified as necessary for the purpose of reducing risks as low as is reasonable practical.

## 5.2 Safe Systems of Work

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Safe working procedures have been developed for a wide range of tasks. They are issued to the employees in the form of a Company Safety Manual. They have been divided into the following sections:

- General Health and Safety
- Site Hazards
- Hazards and Substances
- Plant and Equipment
- Personal Protective Equipment (PPE)

## 5.3 Safe Place of Work

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### Head Office

Arrangements are in place at Head Office to ensure that by routine housekeeping and by weekly cleaning regimes, the Office environment remains conducive to safe and healthy working.

### Site

Where the company undertakes work on a client's premises they will adhere to the arrangements established by the client.

## 5.4 Safety Information and Instruction

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Prior to work commencing on site all employees, subcontractors and visitors will where appropriate have access to and be made aware of Site Safety Rules, Company's Health & Safety Policy, Site Safety Toolbox Talk / Risk Assessment Manual and Identified hazards.

All electrical equipment and temporary electrical installations will where appropriate be subject to visual inspections before use and formal inspection and testing where required.

## 5.5 Training

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All new entrants undertake induction Safety training specific to their assigned duties.

Site training in the elements of safety as contained in the Company's Safety procedures is undertaken together with periodic toolbox talks on a given Safety topic, or as a refresher.

Manager training is identified by the Directors and is undertaken either by internal or external training organisations.

Training needs are identified by the consultation process detailed elsewhere in this Policy and at Management review as part of the Company's Quality procedures.

In addition, the Company carries out regular appraisals by way of staff performance review and in order to determine the direction of the personal development of staff.

All training undertaken by employees is recorded on a central database system and the certificates are held in the individual staff members file.

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## 5.7 Environmental Control

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At Head Office and where it is reasonably practicable on site, the following factors will be controlled (where the Company has control) and monitored: Temperature, Humidity, Ventilation and Air Quality, Noise and Vibration, Lighting and other forms of radiation.

## 5.8 Fire and Emergency Procedures

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In accordance with the Regulatory Reform (Fire Safety) Order 2005 the company undertakes to carry out job specific risk assessments of fire hazards associated with their activities. The company also undertakes to make provision for Fire Fighting Equipment, Procedures and where recommended a Permit to Work System for any Hot Work.

Emergency procedures for the company office premises have been produced and staff are issued with them at their induction.

The procedures are reviewed every 12 months or as any changes are made to the office layout or work activities.

Whilst working on site the company will observe all fire and emergency procedures observed by the customer. All site operatives will be made aware of the procedures in place at the site induction which will be carried out by either the customer or site foreman.

Subcontractors under the company's control will come under these provisions and the client will be fully informed.

## 5.9 Safe use of Equipment

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The Company is committed to compliance with The Provision and Use of Work Equipment Regulations (PUWER).

The activities of the Company are such that fixed items of machinery are not used.

On the rare occasions items of mobile or temporary plant and equipment are used they will be inspected daily and before use on each individual task.

Portable Appliances are formally inspected visually, functionally and electrically (if appropriate) in accordance with PUWER and EWR requirements.

Electrical testing, commonly known as 'PAT' testing, is carried out in accordance with the IET Code of Practice for In-service Inspection and Testing of Electrical Equipment. Records are held at Head Office.

If an item of equipment is found to be defective, then the item must be returned to the Head Office for repair or disposition immediately.

## 5.10 Hazardous Substances

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The Board of Directors consider adherence to the requirements of the Control of Substances Hazardous to Health (C.O.S.H.H) Regulations to be fundamental to the safe working practices desired for all employees and subcontractors.

No hazardous substances will be used unless an assessment has been carried out. This applies to all materials used and purchased by the Company in connection with its activities.

MSDS shall not be used as a substitute for a COSHH assessment.

The company has undertaken to monitor and maintain the release of additions and amendments to C.O.S.H.H. assessments currently available to our records.

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## **5.11 Asbestos**

Prior to starting a project on site the Director in charge of the project will liaise, if appropriate with the client with regard to the location of any asbestos on the site.

Where asbestos has been identified, advice will be sought from the licensed contractor employed by the client as to the correct procedure/s to be employed.

In accordance with the Company's Risk assessment process, operatives will receive asbestos awareness training where appropriate and where risks associated with their activities require it.

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## **5.12 Personal Protective Equipment (PPE)**

The company undertakes to comply with the Personal Protective Equipment at Work Regulations, which require that an assessment be made of the requirement for and suitability of Personal Protective Equipment.

The Compliance Director will when carrying out an assessment of the company's normal undertakings determine the company's standard PPE requirements. A separate policy is available.

In addition a site specific risk assessment that will determine the specific PPE requirements and decide upon the most suitable and compatible PPE to be worn on individual sites.

All employees will be instructed in the correct use of PPE and the Site Safety Toolbox Talk / Risk Assessment Manual will provide information on the use of PPE.

The Regulations also require that employees use PPE "in accordance with the training and instruction given by the employer" and "report any loss or defect of that equipment to their employer" (Regulations 10 & 11).

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## **5.15 Manual Handling**

In accordance with the Manual Handling Operations Regulations the Company Directors will ensure that suitable and sufficient assessments are carried out for tasks that involve manual handling, aiming to remove the hazards and minimise the risk involved with the tasks.

The company will follow the guidelines as laid down by the HSE when producing risk assessments for manual handling, these being:

- Avoid the need for hazardous manual handling, as far as is reasonably practicable.
- Assess: the risk from any hazardous manual handling that can't be avoided
- Reduce: the risk of injury from hazardous manual handling as far as reasonably practicable.

It is the duty of all employees to familiarise themselves with any Manual Handling Risk Assessments and follow any remedial action/s recommended in them.

The company pursues the reduction of risk to employees from manual handling by providing formal manual handling training where necessary.

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## 5.16 Working at Height

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All work at height will be carried out in line with company safety procedures and risk assessments. Additionally any site rules imposed by the client will be adhered to.

Any assessment of risk will include:

- Area work is being carried out in
- Type of work being undertaken
- Suitability of Access Equipment
- Environmental conditions
- The most appropriate work method and control measures

Operatives working from mobile elevated work platforms or mobile scaffold towers will have been trained in their use prior to being allowed to use them.

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## 5.17 Work in Confined Spaces

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In line with the Confined Spaces Regulations the company undertakes to:

- Identify confined spaces
- Not enter confined spaces unless absolutely necessary
- Carry out risk assessment of confined spaces
- Produce a safe system of work with rescue procedures
- Train all operatives in safe working in confined spaces prior to the carrying out any work

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## 5.18 Environmental Management

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The company regards the protection of the environment as of paramount importance. An Environmental Management policy is in place as part of a separate document.

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## 5.19 First Aid

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The law requires that adequate and appropriate first aid provision is available for all employees while at work. Broadly speaking this means having enough competent people with adequate resources to deal with any injury or illness that may occur at work.

The Directors will ensure that all sites will have adequate numbers of First Aiders provided by ourselves or if appropriate by the client. This will be ensured through the completion of a First Aid Risk Assessment to ensure that the company has the appropriate number of first aiders considering the nature of activities being undertaken.

First Aid Kits will be provided by the company as identified by the risk assessment. It is the responsibility of the nominated person to inspect periodically all first aid equipment and to arrange any repairs or replacement that are necessary.

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## 5.20 Display Screen Equipment

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In accordance with the Health & Safety (Display Screen Equipment) Regulations the company undertakes to clarify display screen equipment users and carry out workstation assessments of their activities.

The Directors will ensure that the assessments are carried out.

Assessments will cover:

- The workstation including equipment, furniture and work environment.
- The job being undertaken.
- Special needs of individual staff members. Free eye tests are available for all staff members using DSE if requested.

## 5.21 Electrical Safety

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The company recognises its duty holding responsibilities as Employer and also those duties held by its employees and subcontractor's under section 3 of the Regulations.

The provisions of the Electricity at Work Regulations have been included in the measures taken to eliminate and control hazards arising from its activities.

In particular, Regulations 13 and 14 have been observed where working in close proximity with live conductors etc. cannot be avoided.

It is the declared intention of the company to take all reasonable steps and exercise all due diligence to avoid the commission of an offence under the Regulations.

## 5.23 Responsibilities of Other Contractors

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It is the responsibility of all other Contractor's to see that their employees are conversant with these Safety Regulations and that they comply with them.

It should be emphasised that nothing in these Safety Regulations can relieve other Contractors (referred to as Contractors) of any of their legal or contractual obligations to the Company under the terms of any contract agreement, which may exist between the two parties.

## 5.24 Accident Reporting Procedures.

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A system is in operation that requires the reporting by employees of ALL ACCIDENTS resulting in personal injury; this is followed by an investigation to determine the cause of the accident so as to prevent reoccurrence.

The Company and its employees must abide by the Reporting of Injuries, Diseases and Dangerous Occurrences

Regulations - known as RIDDOR. All accidents must be reported. Accidents must be reported at the site office immediately and at the same time the Supervisor or Projects Engineer must be informed, who will complete a Company Accident Report Form.

Operatives have a duty to report to the company:

- ANYTHING which may be hazardous to the operative or anyone else.

- Machine malfunctions and electrical defects.
- The discharge of any extinguisher.
- Any medical condition which may affect the operative's safety in the use of machinery or which may be hazardous to other persons.
- ALL accidents and ensure they are recorded in the accident book.
- ALL incidents (near misses) regardless of any lack of damage or injury.
- ALL accidentally or otherwise damaged equipment.

In the event that the accident is notifiable under the reporting of injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) then the Safety Director (or in his absence another Competent Person) must be immediately notified by telephone.

The Director for Health and Safety or another competent person will notify the Health and Safety Executive in accordance with the regulations using the prescribed method.

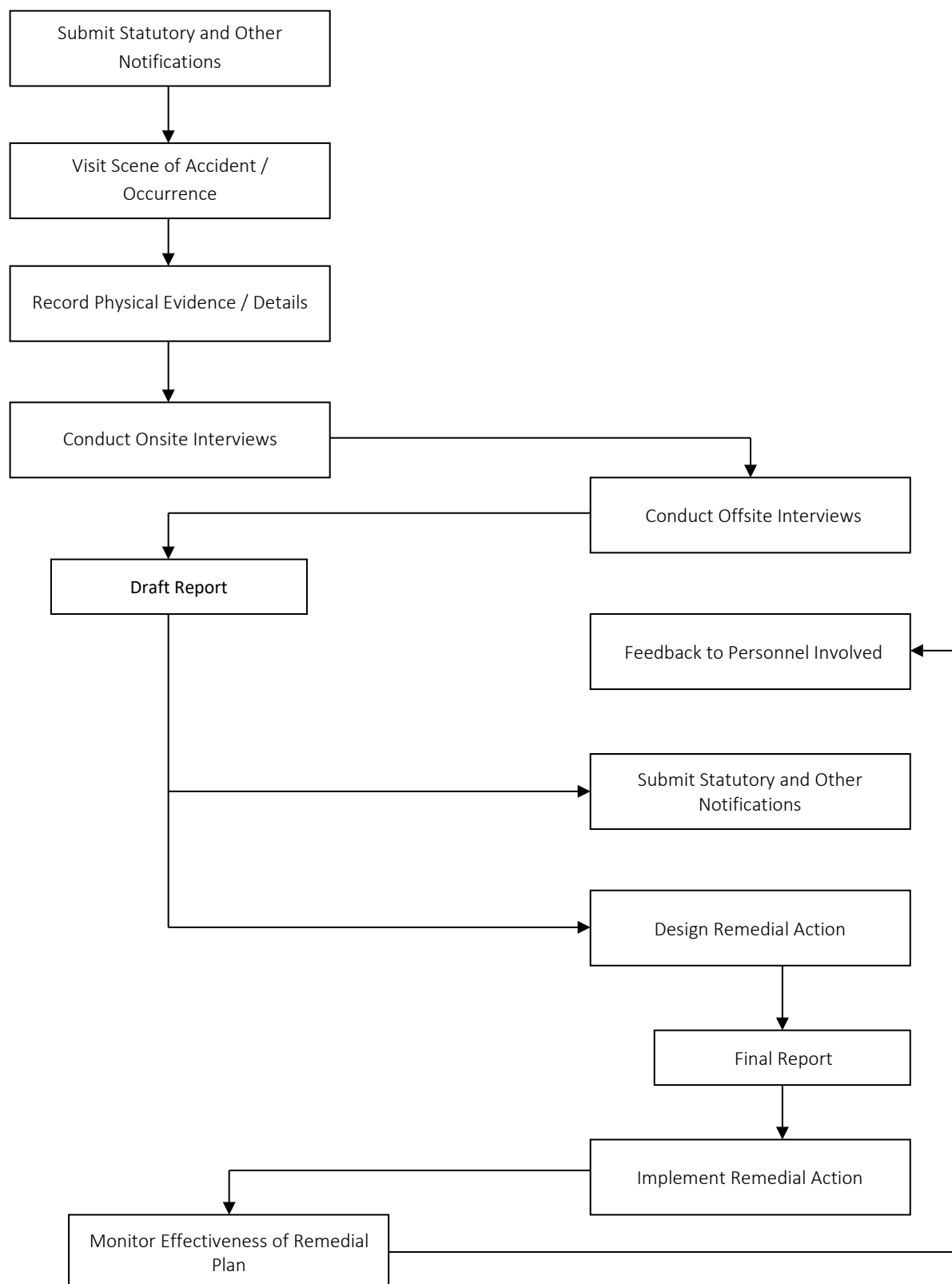
All employees will co-operate with HSE to investigate the circumstances of the Accident or Occurrence.

## **5.25 Accident Investigation Procedures**

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### INVESTIGATION SEQUENCE

*See next page*



All details are reported on a standard Company accident report and/or RIDDOR form as applicable.



## 6. MANAGEMENT OF HEALTH AND SAFETY

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### 6.1 Risk Assessments

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The Company undertakes to make Risk assessments of work carried out by its employees and subcontractors.

For each individual project the risk assessments are reviewed to take into account the nature of the site and the hazards to be encountered.

The following definitions apply when developing a risk assessment:

- **Hazard:** means anything with the potential to cause harm.
- **Risk:** is the likelihood of a hazard event causing injury, ill health or loss and the severity of such injury, ill health or loss.

When risk assessments are produced they are developed in such a way as to provide for the following:

- Identification of hazards
- Identification of those who may be harmed by them
- Evaluation of the risks and existing controls
- Identification of necessary amendments to existing controls or the introduction of additional controls
- Recording of the significant findings
- Review and revision of same as required

### 6.2 Control of Risks

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Preventive and protective measures have been introduced in respect of risks identified by the foregoing procedures. The Company have adopted the following hierarchy of hazard control:

- Eliminate the hazard where possible
- Reduce the risk of hazards (i.e. by substitution)
- Protect by isolation of the hazard or person(s) at risk from it
- Control any remaining hazards by suitable engineering, or other methods
- Provide Personal Protective Equipment to those affected
- Reliance on personnel discipline

### 6.3 Safety Method Statements

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Whilst Risk Assessments identify specific dangers and set out the control measures, which may be required, sometimes more is required.

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Some activities must be carried out in a particular order to ensure safety. Examples of this would include demolition, structural steel erection, or where heavy lifting equipment, cranes etc. are used and which require a safe system of working.

Where this is the case, or if the client requested us, a more detailed statement is produced setting out the specific sequence in which the work will be done, including:

- Details of access equipment, access routes etc.
- Equipment required to carry out the task.
- Locations and details of any lifting equipment.
- Training requirements or competency levels needed.
- Protective equipment required.
- Environmental limitations.
- Protection of third parties
- Co-operation between trades.
- Detailed work sequence cross-referenced to any Risk Assessments or Control Measures.

## 6.4 Employees Responsibilities

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Employees must familiarise themselves with any Method Statements, or Risk Assessments etc., which apply to the task you are undertaking and COMPLY FULLY with their requirements.

## 6.5 Health Surveillance

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Provisions are available for operatives to undergo Health screening where Process hazards, or exposure to hazardous substances and environments determine this to be appropriate.

## 7. MONITORING THE HEALTH AND SAFETY POLICY

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The Company carries out monitoring activities to assess whether the Policy is being effectively pursued within the organisation and the extent of its effectiveness.

Monitoring takes the form of an assessment of the following: Accident, incident and Safety records. Extent of compliance with statutory legislation Extent of compliance within the organisation (non-conformances) Format and content of this Health and Safety Policy document. The results enable management to assess the success in following arrangement procedures and the contributions of all levels of management and workforce.

The objective of the monitoring process is to assist decision-making as to the allocation of resources and preventive measures most effectively.

## 8. REVIEW OF THE HEALTH AND SAFETY POLICY

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The safety policy will be reviewed every twelve months or as and when there are:

- Significant changes to the organisation structure.

- Changes in the work practices carried out by the company.
- Following any incident taking on board the recommendation report.
- Changes to health and safety legislation.

When the policy has been reviewed and updated it will be authorised by the Director of Health and Safety and re-issued to all staff members.

## 9. PUBLICISING THE HEALTH AND SAFETY POLICY

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A Copy of the Safety Policy is issued to all members of the organisation as part of the company induction.

## 10. BREACH OF THIS POLICY

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Any breach of this policy will be treated as a potential disciplinary issue and dealt with through our disciplinary procedure.

## 11 IMPLEMENTATION, MONITORING AND REVIEW

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The Managing Director has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation and may be changed from time to time. Any queries or comments about this policy should be addressed to the Managing Director.