

# SEK-TS Due Diligence Policy.

Effective Date: 1st October 2025

Approved By: Managing Director.

Review Date: 31st March 2026

### 1. Purpose:

The purpose of this policy is to ensure that Sek Technical Services Ltd conducts all business activities with integrity, transparency, and accountability. Through timely and effective due diligence, the company aims to identify, assess, and manage any risks that could impact its operations, clients, partners, or reputation.

#### 2. Scope:

This policy applies to all Sek Technical Services Ltd employees, contractors, consultants, and partners involved in property management, building management, project delivery, and financial transactions or partnerships.

## 3. Policy Statement:

Sek Technical Services Ltd is committed to conducting thorough due diligence on all third parties, projects, and business relationships. The company requires that any issue, concern, or potential risk identified during due diligence be reported within 24 hours to the designated Responsible Person to ensure prompt review and action.

#### 4. Procedures:

#### 4.1 Risk Identification and Assessment:

Staff must evaluate legal, financial, operational, reputational, and ethical risks before finalizing any engagement. Screening tools, background checks, and compliance assessments should be used as appropriate.

## 4.2 Notification Requirement (24-Hour Rule):

Any irregularities, conflicts of interest, compliance concerns, or other due diligence issues must be reported to the Responsible Person (e.g., Building Manager, Freeholders, or Managing Director) within 24 hours of discovery. Notification should be made via the company's official reporting channel (email or secure internal platform).



## 4.3 Documentation and Record Keeping:

All due diligence findings and communications must be recorded in the company's compliance records and stored securely in accordance with Sek Technical Services Ltd Data Protection Policy.

#### 4.4 Escalation Procedure:

The Responsible Person must review all reported issues promptly. If a matter poses a significant risk to the company, it must be escalated to senior management within 24 hours of receipt.

# 4.5 Ongoing Monitoring:

Due diligence reviews should be updated periodically or when there are changes in a third party's ownership, structure, or risk profile.

## 5. Roles and Responsibilities:

All Clients, Contractors:

Responsible for conducting basic due diligence relevant to their role and for reporting issues within 24 hours.

Responsible Person (Freeholder, Building Manager or Designated Lead):

Oversees due diligence processes, ensures timely review of reports, and escalates significant risks.

#### Senior Management:

Ensures resources are in place for compliance and reviews escalated risks for decision-making.

# 6. Compliance and Enforcement:

Non-compliance with this policy, including failure to report within the required 24-hour window, may result in disciplinary action.

Sek Technical Services Ltd reserves the right to review and terminate relationships with third parties who fail to meet due diligence standards.

# 7. Review and Updates:

This policy shall be reviewed annually or sooner if required by regulatory or operational changes. [06/10/2025 13:03]