

Board of Directors and Senior Officers Introduction to the Company

We are delighted to provide this introduction to our Company, which we hope you will find useful and informative.

We are a long established United Kingdom company providing principally Environmental Services to local authorities, organisations, businesses and domestic customers.

We currently have four divisions:

- **Pest Control**
- **Animal Control**
- **Hygiene Services**
- **Customer Services Direct**

We are committed to becoming our customers 1st choice and achieving sustained organic growth, without sacrificing, diluting or deviating from our established and stated core visions and values.

We view adherence to the principles of Customer Service Excellence and Partnership Working as key to our business success and these values are therefore embedded into all our supporting systems, functions and procedures. Staff innovation and exceptional service delivery is recognised and rewarded at all levels within the company.

We actively consult, seek and respond to our customers and Clients needs and measure all key aspects of our performance against defined and challenging performance targets. We view contractual compliance with Partners and full adherence to our Terms and Conditions for customers, as our minimum quality standard and we document, investigate and report on all service delivery failure allegations and complaints.

Our Vision and Values and Equal Opportunities Statements along with our Customer Service Charter provide a further clear and defined set of deliverables.

Our Code of Business Ethics sets out the standards we expect from our employees in their internal and external dealings with colleagues, customers, stakeholders and third parties.

Our Organisation chart sets out how these responsibilities are delegated to managers, supervisors and operational staff and shows links to our retained Highly Qualified and experienced specialists who provide business support functions.

Our Integrated Management System (IMS) provide documented Risk Assessed Systems, Procedures, supporting work instructions and training modules to ensure our functions are provided and Staff are trained to a measured and consistent Quality Standard.

To enable Investors, Stakeholders, Partners and Employees to gain a broad overview of our company ethos and culture, the Board and Senior Officers have produced a new single all inclusive framework policy entitled Company Code of Business Ethics and Social Responsibility.

This policy is drawn from our existing systems and document library and we would invite you to inspect this, if you wish further information on our company.

We thank you for the interest you have shown in our Company and look forward to the opportunity of serving you at some time in the future.

Introduction to the Company Code of Business Ethics and Social Responsibility



DialAPest

Definitions

References to 'Company,' 'we' and 'our' shall mean SDK Environmental Ltd and Dial A Pest.

Introduction

- 1.1 The Company seeks to be a good corporate citizen in everything that it does.
- 1.2 To support this we have drawn from our established Operational Manuals, Policies and Procedures to produce a single framework policy document under the heading of Company Code of Business Ethics and Social Responsibility. The principles encompassed in this policy cover all areas of the Companies operations and have been developed and continues to be reviewed against and updated by reference to relevant Legislation, Regulations and Best Practice.
- 1.3 This Policy does not replace, qualify or negate the need to comply with established systems, manuals or codes of practise, but seeks to bring these all together and provide a clear simplified and working overview.
- 1.4 The Board of Directors and Senior Officers supports the principles set out in these codes and standards and the aim of this policy is to translate that support into a set of guide lines and standards that set a common approach for the Company and demonstrate and provide practical guidance and knowledge for investors, new Clients, our managers and employees on the ground.

Compliance, Monitoring and Reporting

- 2.1 Compliance with this policy will be continuously monitored and subject to review by the Board, supported by Senior Officers. Compliance will be reported annually in the Directors Report, commencing December 2012.
- 2.2 Each local manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility.
- 2.3 Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or through other mechanisms established by the Company to report such breaches. Employee reluctance to report is recognised and therefore our Whistleblowing Policy will extend its protection to also cover Social Responsibility for all employees reporting a concern in good faith.
- 2.4 The Board will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the, Code of business Ethics, Employee Handbook and in established manuals, systems and procedures in the field.



Diarmid Naim
Managing Director
20th March 2020

Company Code of Business Ethics and Social Responsibility

1.1 Basic Standards of Conduct

- 1.1.1 We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- 1.1.2 We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- 1.1.3 We will maintain the highest standards of integrity - for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

1.2 Employees

Our Equal Rights and Diversity Statement

1.2.1 The Company is working towards:

- Ensuring that members of diverse communities are able to obtain appropriate and high quality services and seek employment opportunities with us.
- Ensuring that no individual is excluded from service provision because of their diverse requirements
- Ensuring that equal rights and diversity are an integral part of strategic and operational priorities
- Achieving a workforce that reflects the makeup of the diverse communities in the locations in which they operate
- Establishing equality and diversity objectives and performance targets which are evaluated against local and national indicators, taking remedial action where necessary
- Assessing, monitoring and reviewing existing and proposed policies and procedures to ensure there are no individual or institutional discriminatory practices
- Ensuring that our employees delivering contracted services have an explicit responsibility to create an environment of mutual respect at the locations where they are working in their dealings with our clients, each other and the diverse communities in which they carry out their roles
- Ensuring that there is a clear expectation of employees delivering contracted services to incorporate equal rights in their work practices and behave in a manner consistent without declared policies and procedures in this area
- Actively combating discrimination and exclusion locally and nationally in the context of service provision
- Consulting and working in partnership with the diverse communities and councils and trade unions to combat disadvantages, discrimination and exclusion and to promote equal rights and diversity.

We believe it is the responsibility of our organisation – the directors, managers, consultants and staff – to ensure that this statement is implemented.

Company Code of Business Ethics and Social Responsibility

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1.2.2 Our commitment to employees :

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- We will review all our employment practices and procedures to ensure fairness.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management.
- The policy will be monitored and reviewed regularly.
- To investigate quickly and fairly any errors or omissions of work which you have told us about. We will not take sides with the Customer against you, and will listen to your side of the story before making an independent judgement. We will present your case to the Customer in the best way possible.
- To reward any initiatives, good ideas or cost saving plans that have a positive effect on our business
- Most of our services are contracts, which are only secure for a limited period. When a contract is nearing its end, we will keep you fully informed of negotiations and tenders for the new contract. You will be told directly from us of all the facts relating to the contract. We will not withhold any information which affects your employment with us, but we may, during the tender process, have to withhold any information, which the Customer tells us is confidential.
- If we lose a contract, we will do our utmost to protect your long term employment rights.
- We will stick to our published salary scales. We will never ask you to accept a reduction in wages so that we can win a contract

1.2.3 We have produced and maintain a comprehensive Employee Handbook which forms an integral part of employment with our Company. Adherence to the various policies and procedures is a condition of employment.

1.3 Business Integrity

- 1.3.1 We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- 1.3.2 In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.
- 1.3.3 We will conduct our operations in accordance with the principles of fair competition and applicable regulations.
- 1.3.4 The company accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- 1.3.5 No unrecorded account, fund or asset will be established or maintained.
- 1.3.6 We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.
- 1.3.7 We will review and track our business risks including social and environmental risks.
- 1.3.8 The Company will not facilitate, support, tolerate or condone any form of money laundering.
- 1.3.9 To ensure that our business is run in an ethical and effective manner we will maintain internal controls in line with the Companies Minimum Standards of Business Control.

Company Code of Business Ethics and Social Responsibility

1.4 Trade

- 1.4.1 We will seek to compete fairly and ethically and will not prevent others from competing fairly with us.
- 1.4.2 We will submit Pre-Qualification Questionnaires and Tenders in full compliance with legislative requirements and best practice.
- 1.4.3 We will commit to work and co-operate with incoming and outgoing contractors in a positive manner to ensure service continuity is maintained and the impact on customers is minimised or eliminated.

1.5 Personal Conduct

- 1.5.1 All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics and our Employee Handbook.
- 1.5.2 Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, cash and procurement cards.
- 1.6.3 Employees are expected to use e-mail, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code and any applicable IT policies.

1.6 Bribery

- 1.6.1 No Company employee or individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.
- 1.6.2 This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.
- 1.6.3 The Company shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the Company in line with the requirements of the Bribery Act 2010 and as set out in the Group Anti-Bribery Policy.

1.7 Gifts, Entertainment and Improper Payments

- 1.7.1 Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager, or Director.
- 1.7.2 Any gift or hospitality given or received by an employee should be reported for inclusion on the Company Gifts and Hospitality Registers, as set out in the Group Gifts and Hospitality Policy. In the UK this applies to any gift or hospitality with an estimated or actual value of £50 or more.

1.8 Conflicts of Interest

- 1.8.1 Whilst we respect the privacy of our employees, all employees are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to the Company.
- 1.8.2 Company employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- 1.8.3 All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.
- 1.8.4 There should be no unauthorised disclosure of price sensitive information to third parties.

Company Code of Business Ethics and Social Responsibility



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1.9 Confidentiality

- 1.9.1 Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- 1.9.2 Where confidential information is obtained in the course of business that confidentiality must be respected.

1.10 Political Activity

The Company does not make any donations to political parties or take part in party politics. However, when dealing with Government we do make legitimate concerns known and will seek to influence Government in relation to issues that could affect us, our shareholders, our customers or the local community. These relationships are conducted in accordance with this Code.

1.11 Health and Safety

- 1.11.1 We are committed to creating and maintaining a safe and healthy working environment for our employees, customers and the community.
- 1.11.2 Our commitment to ensuring the safety and security of our employees is set out in our Health and Safety Policy Statement and supported by our policies and procedures.
- 1.11.3 We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.
- 1.11.4 We undertake to always give Health & Safety equal value and weighting to Operations, Finance, Marketing, Sales and Development and provide the necessary budgetary requirements to achieve stated aims and objectives.
- 1.11.5 The Managing Director accepts and fully understands his ultimate responsibility for the provision of Health and Safety within the company and through the management structure the need to delegate functions and responsibilities throughout the workforce.
- 1.11.6 The company through the Board of Directors is committed to setting clear identifiable Health and Safety aims and objectives that are both measurable and challenging, that exceed our industry standards, such that there is a demonstrable year on year improvement in all aspects of the companies work.
- 1.11.7 The company embraces the concept of continual improvement and as such aims to meet and indeed exceed the standard: OHSAS 18001 to ensure the continuing Health, Safety and Welfare of those whom we work with, supply and engage.
- 1.11.8 Where practicable we will pass on best practice relating to Health and Safety to other partner organisations in the hope that we can affect a change within our industry by making it a safer place to work.
- 1.11.9 We will endeavour to listen to our customers, employees and partners and adopt any suggestion which may improve our safe systems of work, policies and procedures for the benefit of the aforesaid. Any suggestion made will be given credence and will reviewed before management representatives to ensure compliance with our business objectives.

1.12 The Environment

- 1.12.1 The Company is committed to making continuous improvement in the management of its environmental impact as set out in our Environmental Policy.
- 1.12.2 All employees are expected to adhere to the requirements of the local environmental management system and support the improvement in our environmental performance.

Company Code of Business Ethics and Social Responsibility

1.13 Customers

- 1.13.1 The Company is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.
- 1.13.2 All employees are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Code.
- 1.13.3 In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees. Employees will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.

1.14 Shareholders

- 1.14.1 The Company will conduct its operations in accordance with the principles of good corporate governance.
- 1.14.2 We will provide timely, regular and reliable information on the business to all our shareholders.

1.15 Supply Chain

- 1.15.1 We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.
- 1.15.2 Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardised human rights, safety or the environment.
- 1.15.3 We expect our suppliers to adhere to business principles consistent with our own. We expect them to adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our Supplier Policy.
- 1.15.4 We will seek to work with our suppliers to develop long-term meaningful relationships to benefit both parties with the aim of improving the quality, environmental performance and sustainability of goods and services.
- 1.15.5 The Company Procurement & Supply Policy sets out clear guidelines in the way that the Company expects procurement and supplier management activities to be carried out.

1.16 Community Involvement

- 1.16.1 Our operations touch members of the community daily, whether as customers, neighbours, employees, businesses or residents. We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

Our Vision and Values

Our Vision

SDK Environmental trading as Dial-A-Pest exists to serve the people and businesses with whom we are associated directly or via the Councils with whom we work.

Our vision for the Company is a simple one – we aim to be one of the UK's top performing Pest Control and Dog Warden companies, recognised by the councils, companies and individuals with whom we work for our service excellence.

We want everyone who works for SDK Environmental Ltd/Dial-A-Pest to be proud of the Company and the services it offers.

Putting our Clients and Customers First

SDK Environmental/Dial-A-Pest exists to serve our clients, the councils and businesses who commission us and the people who call upon our services. Meeting the needs and aspirations of our customers is central to everything we do and customer satisfaction is the ultimate measure of our success.

Serving the Communities with Whom We Work

Our customers live in areas of great diversity. The communities in which we work include cities, towns, villages and small hamlets. The ever changing populations originate from all corners of the globe, creating a rich cultural mix. We aim to serve them equally.

Acting with Integrity

Integrity is a fundamental value that the public rightly expects should underpin everything the Company does. As well as acting with integrity in our dealings with our customers, we must also act with integrity in our dealings we have with each other.

Valuing People

We will best serve our customers as well as getting the best out of our staff by valuing them as people and creating a culture which celebrates diversity and allows individuality to flourish.

Continuous Improvement and Innovation

Continuous improvement and innovation are the foundations for improving the efficiency and effectiveness of the Company's services and increasing customer satisfaction. They are the responsibility of everyone at SDK Environmental/Dial-A-Pest. We are aware that continuous improvement through a myriad of small changes can be just as effective as major innovations.

Measuring Customer Satisfaction

We will listen to what our customers say about the service we provide, measuring these against the customer service standards we have set, and making positive changes as part of our continuing commitment to exceed contractual obligations.

Mission Statement

“To provide a consistent and high quality service to our clients and customers by the utilisation of our skills, knowledge and technology

To protect, improve and maintain the home and environment in a professional manner whilst enabling rapid yet controlled growth

To be recognised by the councils, companies and individuals that we serve as the UK's top performing pest, animal and waste service provider”

The logo for DialA Pest, featuring the word 'Dial' in white and 'A Pest' in yellow, all within a black rectangular box with a yellow border.A handwritten signature in black ink, appearing to read 'Diarmid Naim'.

Diarmid Naim
Managing Director
20th March 2020

The logo for SDK Environmental Ltd, featuring the letters 'SDK' in a large, bold, green font with a white outline, and 'ENVIRONMENTAL Ltd' in a smaller, green font below it, all within a green rectangular box.

“ Our vision for the Company is a simple one – we aim to be one of the UK’s top performing Pest Control and Dog Warden companies, recognised for our customer service excellence by the councils, companies and individuals with whom we work ”

SDK Environmental Ltd / Dial-a-Pest exists to serve the people and businesses with whom we are associated, either directly or via the Councils with whom we work.

SDK Environmental Ltd/Dial-a-Pest makes the following customer service excellence commitments:

- Calls to our Customer Service Centre will be answered within 2 minutes
- We will respond to all emails the same working day
- Customers will be offered appointments identified by date and at a time to within a.m. or p.m. period in any day
- In an emergency, a next day service can be offered
- In exceptional circumstances and when possible, we offer a visit notification call 30 minutes before the technician will arrive
- As soon as a Field Officer becomes aware that they are running late or cannot meet an appointment, they will let the customer know and why before the expiry of their slot and give the customer the opportunity to re-book the appointment
- We promise that for chargeable pest treatments if we fail to meet an appointment and notify the customer accordingly the customer shall receive a 50% reduction on a re-arranged call or a full refund if the visit is prepaid and the customer wishes to cancel
- If we need to change an appointment we will normally give 24 hours’ notice
- In order to reflect the diversity of our customer, information on procedures and preparation for pest technician visits is provided in a wide variety of languages on the SDK Environmental/Dial-a-Pest websites www.sdke.co.uk or www.dialapest.co.uk
- We will use a number of reliable and accurate methods to measure customer satisfaction and act upon the information we receive
- We will comply with our Customer Complaints Procedure and promptly confirm receipt of any complaint received, investigate and advise the customer of our findings

A handwritten signature in black ink, appearing to read 'Diarmid Naim'.

Diarmid Naim
Managing Director
20th March 2020

Equal Opportunities and Diversity Policy



DialA Pest

SDK Environmental trading as Dial-A-Pest is working towards:

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- Ensuring that no individual is excluded from service provision because of their diverse requirements
- Ensuring that equal rights and diversity are an integral part of strategic and operational priorities
- Achieving a workforce that reflects the makeup of the diverse communities in the locations in which they operate
- Establishing equality and diversity objectives and performance targets which are evaluated against local and national indicators, taking remedial action where necessary
- Assessing, monitoring and reviewing existing and proposed policies and procedures to ensure there are no individual or institutional discriminatory practices
- Ensuring that our employees delivering contracted services have an explicit responsibility to create an environment of mutual respect at the locations where they are working in their dealings with our clients, each other and the diverse communities in which they carry out their roles
- Ensuring that there is a clear expectation of employees delivering contracted services to incorporate equal rights in their work practices and behave in a manner consistent with our declared policies and procedures in this area
- Actively combating discrimination and exclusion locally and nationally in the context of service provision
- Consulting and working in partnership with the diverse communities and councils and trade unions to combat disadvantages, discrimination and exclusion and to promote equal rights and diversity

We believe it is the responsibility of our organisation – the directors, managers, consultants and staff – to ensure that this statement is implemented.



Diarmid Naim
Managing Director
20th March 2020

Welcoming Diversity

We are committed to being an Equal Opportunities Employer.

Our aim is to employ a workforce from as wide and diverse a talent pool as possible irrespective of any individual's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion/belief, sex or sexual orientation.

We are keen to provide applicants who have a disability with the same level of opportunity when applying for work as non-disabled applicants. The Company has signed up to the 'Disability Confident' scheme and to its commitments – guaranteed selection interviews, consulting with disabled employees, retaining disabled employees, developing awareness and reviewing progress.

Eradicating Discrimination

We believe in treating all our employees fairly and with dignity regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion/belief, sex and sexual orientation.

We are dedicated to eradicating all forms of discrimination in the workplace. No decision will be taken that directly or indirectly discriminate against any employee, including any decisions regarding recruitment and selection, performance management, pay and reward, training and development, or handling disciplinary or grievance issues.

The Company requires every employee to treat all members of staff and all other people with whom they interact at work with respect and dignity. Training on equal opportunities and diversity is provided to all employees.

Dealing with Harassment and Victimisation

Harassment (i.e. unwanted conduct towards a person which violates their dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment) or victimisation for whatever reason is entirely unacceptable.

We will fully investigate any allegation of discrimination and, if appropriate, deal with it under the Company's disciplinary procedure.



SDK
ENVIRONMENTAL Ltd

Partnering Policy and Statement of Operational Intent



Partnering Policy Contracted Clients

The document aims to formalise our policy for fostering, developing and maintaining of partnership agreements with all our Contracted Clients

Contractual Specification

It is recognised that for any partner relationship to build, develop and flourish there must be a clear understanding between both parties of the contractual specification requirements applying, and the need to meet these as a minimum. Our contractual partner relationship should lead to these, where possible, being exceeded. At all times we will seek to cater for, and reflect, customer's wishes

Quarterly Contract Review

We will provide a quarterly documented contract review. The review will be supported by up to date comprehensive, accurate service statistics. KPI reporting will confirm standards are being met and ensure service quality and continuity

Annual Service Review

We will arrange an Annual Service Review meeting which is open to be attended by Senior Officers, key service level partners, Portfolio Holders, elected members and any interested customer focus groups. To structure the meeting we will provide a supporting comprehensive road map and strategy reference document to highlight performance measurement.

The Review will incorporate any required enhancements, improvements or changes and respond to any feedback from customers.

The setting of future measurable performance targets will be added to contract specification.

We undertake to adopt and maintain the following practices in all our dealings with any **Contracted Client, Approved Partner Company or Business Charity, Key Stakeholder or Public Body** with whom we interact or deliver services

- To work together to develop a long term relationship and service delivery to the benefit of all parties and service users
- To agree together at the outset what you can expect from the service we provide
- To demonstrate that we set out to deliver the services we agreed and outcomes will be positive for the majority of customers
- To achieve financial success by agreeing in advance performance levels
- To continually improve the working relationship and service delivery to the benefit of all parties and service users
- To solve problems and arrive at acceptable solutions within an agreed time frame
- To share good practice in relation to service delivery
- Build up a knowledge base through information sharing and to undertake to share this securely
- To react to changing legislation, guidance and case law, implementing changes when and as required
- To abide by our Protection of Children and Vulnerable Adults Policy
- To maintain the standards set by our triple ISO accreditations
- To place any resources, labour and plant our company has available that will assist and support partner organisations in the event of national or local disaster
- To undertake to co-operate with Client initiatives in respect of their provision being delivered along with local communities, action/ focus groups and charities

Overall we will

- To work together to develop a long term relationship through respect, openness, honesty and trust
- Communicate these aims and objectives to all our company staff



Diarmid Naim
Managing Director
20th March 2020

Vulnerable Persons Policy

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The company engages in activities such as Dog Warden and Pest Control which will

- bring it into contact with children, the elderly, residents of hostels, nursing homes, and other vulnerable groups
- work activities will also include access to customers homes, and unsupervised work in, for example, lofts

The company is aware of the risks to these groups which might result from contact with our employees - for example

- Theft from having free access within premises
- Theft or fraudulent dealing in respect of monies paid by customers
- Failure to take account of religious or ethnic sensitivity in respect of entering premises
- Inappropriate behaviour in dress, demeanour, or language
- Taking advantage of a vulnerable person

Conduct and attitude to customers is included as part of the training given by the company, and is reinforced where required by Work Instructions issued in respect of specific work activities as part of the company Quality Assurance management system.

- Financial vulnerabilities are dealt with by our internal audit systems
- HR will report on a programmed basis any staffing issues that have arisen and require Management attention
- The Health and Safety Officer will provide on a programmed basis a report on any items causing concern or requiring attention
- A complaints register will be maintained by Administrative Support and all alleged complaints will be investigated and reported on. Customer complaints or aspirations of perceived service being unsatisfactory, even if the specification was complied with, will be highlighted

Disclosure and Barring Service Checks

In some cases it is appropriate that employees are cleared through the DBS system before being permitted to work with certain groups. This is often the case where the employee will be dealing with school children as a group or as an individual.


However, such checks should not be regarded as a matter of routine and must also be balanced against the employee's rights to freedom of intrusion into their own private life.

The policy of the company is to require DBS checks of all employees who may come into contact with our customers. The company will undertake to work with the local authority and our employee to provide these.

(Procedure varies between our different clients – some require the employee to present themselves to the local authority, who then provides the documentation and undertakes the check, others require that this is carried out and certified correct by the company)

Driving Licence Checks

Although not directly related to DBS checks and/or vulnerable persons, our company policy also requires the regular validation of driving licences held by staff who use company vehicles. These checks are made from the DVLA database by a third party provider, following written agreement from the employee



Diarmid Naim
Managing Director
20th March 2020


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Health and Safety Policy

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SDK (Environmental) Limited is a well-established, professional company operating in the pest and animal control market. Whilst we operate mainly as a service provider to public sector local authorities, our services are also available directly to the domestic and business sectors.

1. It is the policy of SDK (Environmental) Ltd to ensure, so far as it is reasonably practicable, the health, safety, and welfare of all its employees whilst in the course of their employment, as well as other persons on its premises, and the community at large in so far as they are affected by its activities. To this end, SDK (Environmental) Ltd is committed to the prevention of injury and ill health and continual improvement in OH&S management and OH&S performance.
2. The Directors of the Company are responsible for implementing the policy on a Company wide basis, and will
 - a. prepare and publish details of the organisation of the company. This Statement of Safety Policy includes such details.
 - b. ensure that all staff are made familiar with the Policy in order that it can be implemented as an integral part of working routine.
 - c. review and modify this Policy from time to time.
3. SDK (Environmental) Ltd will at least comply with applicable legal and other requirements related to its OH&S hazards. In particular it recognises, and will implement the requirements of the Health and Safety at Work Etc. Act 1974 with particular regard to
 - a. the provision and maintenance of plant and systems of work that are, so far as reasonably practicable, safe and without risks to health;
 - b. arrangements for ensuring so far as it is reasonably practicable, safety and the absence of risks to health in connection with the use, handling, storage, and transport of animals, articles, and substances;
 - c. the provision of such information, instruction, training, and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of its employees;
 - d. so far as is reasonably practicable as regards any place of work under the control of the company to maintain that place in a condition that is safe and without risks to health, and to provide means of access to and egress from it that are safe and without such risks;
 - e. where employees are required to work in premises, or at a location over which the company has no control, suitable guidance, instructions, and where necessary additional training will be provided to ensure, so far as is reasonably practicable, that any risks associated with the work or the premises are minimised
 - f. that the health and safety of persons not in its employ are not, so far as is reasonably practicable, placed at risk either by the activities of the company or
 - g. by any premises or facilities made available for use by members of the public.
4. To ensure that the commitments given in paragraphs (1) to (3) above are implemented, the company will, as an integral part of its management, make adequate financial resources available to meet Health and Safety requirements.
5. In line with the commitment to continual improvement, SDK (Environmental) Ltd. will maintain a programme of OH&S objectives which will receive appropriate support from its Directors.
6. No Safety policy is likely to be successful unless it actively involves work people themselves. The company will cooperate fully with any request from employees in the appointment of Safety Representatives and will provide them with sufficient facilities and training to carry out this task. SDK (Environmental) Ltd. acknowledges that with small numbers of employees dispersed at geographically distant locations it may be difficult for employees to make such appointments. In the absence of any appointed Safety Representatives, the company will encourage individual employees to freely make their views known on Health and Safety matters.
7. SDK (Environmental) Ltd reminds its employees of their own duties under Section 7 & 8 of the Health and Safety at Work Etc. Act 1974 to take care for their own Safety and that of other persons, and to co-operate with the company so as to enable it to carry out its own responsibilities successfully.
8. A copy of the Occupational Health & Safety Policy will be issued to all employees
9. Safety guidance and procedures for specific work practices are given in the company's Integrated Management System. Paper or electronic copies of the IMS Manual and Procedures will be kept at all offices of the company and will be available for inspection by any employee. The IMS should be consulted before any new or unfamiliar work is undertaken.


Diarmid Naim
Managing Director
20th March 2020

SDK
ENVIRONMENTAL Ltd



Foreword

This Safety Policy and supporting Integrated Management System (IMS) have been produced by SDK (Environmental) Ltd, not just to meet the legal requirements of the Health and Safety at Work Etc., Act 1974, but to promote a healthy awareness of our working practices and environment, and therefore to encourage all staff to take an active interest in maintaining proper safe working practices for themselves and their colleagues.

A copy of the Safety Policy will be given to all existing staff, and will be given to all new staff as part of their induction training. Copies will be available at all offices of the company

Health and Safety

Organisational Layout and Responsibilities

It is the responsibility of the Directors to ensure that the safety policy and manual is implemented and that it is reviewed and modified when required. It is the responsibility of individual managers to ensure on a day to day basis that the safety policy and Integrated Management System is adhered to, and it is the responsibility of the individual employees to carry out their work in conformance with the requirements of the safety manual. Any suggestions for improvement of the safety policy and procedures or any constructive criticism is both welcome and encouraged. Any employee who has any comment or suggestions should speak with Mr D. Nairn

Directors

- Financial provision for Health and Safety
- Health and Safety Policy and Manual
- Regular Review of Health and Safety requirements

Senior Management and Supervisors

- Implementation of Health and Safety Policy and Integrated Management System
- Reporting of issues affecting or requiring amendment of Health and Safety Policy and Integrated Management System
- Liaison with proprietor for continuous improvement of Health and Safety

Employees

- Working to the requirements of the Health and Safety Policy and Procedures
- Reporting of Health and Safety incidents and problems
- Liaison with supervisors for continuous improvement of Health and Safety. All employees have the right to a private meeting with a director to discuss any concerns should they not wish to involve their supervisor

Health and Safety Policy

DialAPest

SDK (Environmental) Limited is a well-established, professional company operating in the pest and animal control market. Whilst we operate mainly as a service provider to public sector local authorities, our services are also available directly to the domestic and business sectors.

1. It is the policy of SDK (Environmental) Ltd to ensure, so far as it is reasonably practicable, the health, safety, and welfare of all its employees whilst in the course of their employment, as well as other persons on its premises, and the community at large in so far as they are affected by its activities. To this end, SDK (Environmental) Ltd is committed to eliminating hazards; reducing risks; providing safe and healthy working conditions for the prevention of injury and ill health. The company commits to continual improvement in OH&S management and OH&S performance.
2. The Directors of the Company are responsible for implementing the policy on a Company wide basis, and will
 - a. prepare and publish details of the organisation of the company. This Statement of Safety Policy includes such details.
 - b. ensure that all staff are made familiar with the Policy in order that it can be implemented as an integral part of working routine.
 - c. review and modify this Policy from time to time.
3. SDK (Environmental) Ltd will at least comply with applicable legal and other requirements related to its OH&S hazards. In particular it recognises, and will implement the requirements of the Health and Safety at Work Etc. Act 1974 with particular regard to
 - a. the provision and maintenance of plant and systems of work that are, so far as reasonably practicable, safe and without risks to health;
 - b. arrangements for ensuring so far as it is reasonably practicable, safety and the absence of risks to health in connection with the use, handling, storage, and transport of animals, articles, and substances;
 - c. the provision of such information, instruction, training, and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of its employees;
 - d. so far as is reasonably practicable as regards any place of work under the control of the company to maintain that place in a condition that is safe and without risks to health, and to provide means of access to and egress from it that are safe and without such risks;
 - e. where employees are required to work in premises, or at a location over which the company has no control, suitable guidance, instructions, and where necessary additional training will be provided to ensure, so far as is reasonably practicable, that any risks associated with the work or the premises are minimised
 - f. that the health and safety of persons not in its employ are not, so far as is reasonably practicable, placed at risk either by the activities of the company or
 - g. by any premises or facilities made available for use by members of the public.
4. To ensure that the commitments given in paragraphs (1) to (3) above are implemented, the company will, as an integral part of its management, make adequate financial resources available to meet Health and Safety requirements.
5. In line with the commitment to continual improvement, SDK (Environmental) Ltd. will maintain a programme of OH&S objectives which will receive appropriate support from its Directors.
6. No Safety policy is likely to be successful unless it actively involves work people themselves. The company will cooperate fully with any request from employees in the appointment of Safety Representatives and will provide them with sufficient facilities and training to carry out this task. SDK (Environmental) Ltd. acknowledges that with small numbers of employees dispersed at geographically distant locations it may be difficult for employees to make such appointments. In the absence of any appointed Safety Representatives, the company will encourage individual employees to freely make their views known on Health and Safety matters.
7. SDK (Environmental) Ltd reminds its employees of their own duties under Section 7 & 8 of the Health and Safety at Work Etc. Act 1974 to take care for their own Safety and that of other persons, and to co-operate with the company so as to enable it to carry out its own responsibilities successfully.
8. A copy of the Occupational Health & Safety Policy will be issued to all employees
9. Safety guidance and procedures for specific work practices are given in the company's Integrated Management System. Paper or electronic copies of the IMS Manual and Procedures will be kept at all offices of the company and will be available for inspection by any employee. The IMS should be consulted before any new or unfamiliar work is undertaken.


Diarmid Naim
Managing Director
20th March 2020

SDK
ENVIRONMENTAL Ltd

Risk Management Policy Statement

DialAPest

The aim of this policy is to ensure risk management is and remains embedded as a cornerstone for all key decisions and is recognised and practised at all levels throughout the company. This policy further aims to clarify the structure and framework to be used in the development of a comprehensive Risk Management Strategy document that meets this objective.

Objectives

SDK Environmental / Dial A Pest is committed to implementing a proactive approach to risk management that is based on the following key principles:

- Risk management activity will be aligned to corporate and business plan aims, objectives and priorities. It will encompass all strategic and operational risks that may prevent SDK Environmental / Dial A Pest from fulfilling its objectives.
- Risk management is key to the Company's corporate strategy.
- The Company will anticipate and take preventative action to avoid risks rather than dealing with the consequences.
- Risk management is a process to assist in understanding risks and thereby to contribute to improved decision-making. The purpose therefore is not to design out all risk, but to manage it effectively and appropriately.
- A consistent approach to the identification, assessment and management of risks will be embedded throughout the Company.
- Risk control and mitigation measures will be effective, appropriate, proportionate, affordable and flexible.
- Risk controls will not be implemented where the cost and effort is disproportionate to the expected benefits. The SDK Environmental / Dial A Pest Board will commit the necessary resources to implement risk management consistent with the above principles.

This policy requires all employees to take group and individual responsibility for the cost effective management of risk.

Risk can be
defined as:

"The threat that
an event or action
will adversely
affect the
Company's
ability to achieve
its objectives,
perform its duties
or meet the
expectations of
its customers"



Diarmid Naim
Managing Director
20th March 2020

SDK
ENVIRONMENTAL Ltd

Business Continuity and Disaster Recovery Policy Statement

Policy

SDK will implement a business continuity management process to minimise the impact on the organisation and recover from loss of information assets to an acceptable level through a combination of preventive and recovery controls. Loss may result from, for example, accidents, natural disasters, equipment failures and deliberate actions.

The process will identify the critical business processes and integrate the information security management requirements of business continuity with other continuity requirements relating to such aspects as staffing, operations, materials, transport and facilities.

SDK will develop and maintain a process for business continuity throughout the organisation that addresses the information security requirements needed for the organisation's business continuity.

The business continuity process will include the following key elements:

- Identify all assets involved in critical business processes
- Understand the impact which interruptions cause by information security incidents are likely to have on the business
- Impact assessment will include a series of smaller events and major events
- Considering the purchase of appropriate insurance which will form part of an overall business continuity process, as well as being part of operational risk management
- Identifying and considering the implementation of additional preventive and mitigating controls
- Ensuring the safety of staff and the protection of information processing facilities and organisational property
- Formulating and documenting a business continuity plan
- Testing and updating the plan at defined intervals
- Ensuring that the management of business continuity is included in SDK's processes and structure
- Assigning the roles and responsibilities for business continuity at an appropriate level

SDK's Business Continuity Plan will be developed and implemented to maintain or restore business operations and ensure the confidentiality, integrity and availability of information within specified timescales following interruption to, or failure of, critical business processes.

Objective

To counteract interruptions to business activities and to protect critical business processes from the effects of major failures of information systems or disasters and to ensure their timely resumption

Trading Terms and Conditions

Legal Review

We regularly instruct our solicitors to review our Terms and Conditions in order to ensure continued legal compliance, particularly with the Consumer Protection (Distance Selling) Regulations 2000, as amended by the the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013 and the General Data Protection Regulations (GDPR).

We know that you expect legal compliance as a minimum level of service and we are proud to say that we are fully compliant with the current distance selling rules and GDPR as well as the legislation listed below.

This information sheet briefly explains some of the changes we have been advised to make, but please let us know if you would like to discuss this further.

Distance Selling Regulations

Pre-Contractual Information

Under the Regulations we must provide our personal customers with certain information before the booking is made. For example, we must explain who we are, the price of the treatment, what the service will consist of and what cancellation rights the customer has.

Written and Additional Information

The Regulations require us to confirm most of the pre-contractual information and some additional information in writing to customers quickly in order to allow them an opportunity to review the full terms and cancel the booking if they wish. This information includes a written explanation of their cancellation rights.

Cancellation Rights

Personal customers have the right to cancel the treatment within 14 days of making the booking, or if earlier, when the treatment has been completed. If customers decide to cancel the booking before treatments begins, they will be entitled to a full refund.

If we fail to explain their cancellation rights properly, they will have the right to cancel the service and receive a full refund even after the treatment has been carried out.

General Data Protection Regulations

From May 2018, we will need to comply with the new data protection rules. We have already updated our Terms & Conditions to comply with this, to ensure that the requirements, particularly regarding consents and accountability, are satisfied before the deadline.

Health and Safety

We are also legally obliged to provide (so far as is reasonably practicable) a safe system of work for our employees. So our new terms make it clear that we will not be able to treat habitats in certain locations if to do so would put our employees at risk.

The logo for DialAPest, featuring the company name in a bold, sans-serif font. The 'A' is stylized with a yellow and black striped pattern.

Other legislation that we comply with

SDK can also confirm that it complies with the following in relation to its consumer contracts:

- Business Protection from Misleading Marketing Regulations 2008 as amended
- Company, Limited Liability Partnership and Business (Names and Trading Disclosures) Regulations 2015
- Consumer Protection from Unfair Trading Regulations 2008
- Privacy and Electronic Communications (EC Directive) Regulations 2003
- Provision of Services Regulations 2009 as amended
- Supply of Goods and Services Act 1982 as amended
- Unfair Contract Terms Act 1977 as amended
- Consumer Rights Act 2015

A handwritten signature in black ink, appearing to read 'Diarmid Naim'.

Diarmid Naim
Managing Director
20th March 2020

The logo for SDK ENVIRONMENTAL Ltd. It features the letters 'SDK' in a large, bold, white font with a green outline, followed by 'ENVIRONMENTAL Ltd' in a smaller, green, sans-serif font. A small green leaf icon is positioned above the 'K'.

Policy

The Information Security Management Policy (SDK-IS04001) is issued with the approval and support of the Managing Director (MD) and the Information Security Steering Committee (ISSC) and is maintained by the Data Protection Manager. This Policy has been published and communicated to all staff on the corporate intranet and will be issued to relevant external parties.

The MD and ISSC are committed to preserving the confidentiality, integrity and availability of all assets of value to the organisation, both physical and information assets, including client assets whilst in SDK's possession.

It is the Policy of SDK to ensure that:

- Information will be protected against unauthorised access
- Confidentiality of information will be assured
- Integrity of information will be maintained
- Availability will be monitored
- Regulatory and legislative requirements will be met
- Business continuity plans will be produced and maintained
- Information security training will be available to all staff
- All breaches of information security, actual or suspected, will be reported to, and investigated by, the Data Protection Manager

The Company's Information Security Management System is aligned with ISO 27001 and based on the following:

- The development of the policy follows the Plan-Do-Check-Act process of continual improvement
- Guidance and procedures will be produced to support this policy. These may/will include incident handling, information backup, system access, virus controls, passwords and encryption
- The role and responsibility of the designated Data Protection Manager is to manage information security and to provide advice and guidance on implementation of the Information Security Policy
- It is the responsibility of each employee to adhere to the Information Security Policy

The Policy will be reviewed at planned intervals or if significant changes occur to ensure its continuing suitability, adequacy, and effectiveness.



The organisation provides management direction and support for information security in accordance with business requirements and relevant laws and regulations

Data Protection Policy Statement

DialApest

SDK has appointed a Data Protection Manager to develop, implement and maintain the Data Protection Policy and ensure that SDK acts in accordance with the Data Protection Act (the "Act") and specifically the Eight Principles.

In complying with the Eight Principles of the Act, SDK will ensure that personal data shall:

- be obtained and processed fairly and lawfully and not be processed unless certain conditions are met;
- be obtained for a specific and lawful purpose and not be processed in any manner which is incompatible with that purpose;
- be adequate, relevant and not excessive for that purpose;
- be accurate and kept up to date where necessary;
- not kept for longer than is necessary for that purpose;
- be processed in accordance with the data subject's rights;
- be kept secure and safe from unauthorised access, accidental loss, damage or destruction;
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

The Data Protection Policy will apply to all staff who will be trained and are expected to deal with personal and sensitive personal data in accordance with the policy and procedures at SDK.

SDK will apply appropriate procedures for ensuring compliance when processing, handling and storing data as a Data Processor for another organisation.

SDK seeks to align its business with ISO 27001 (the international standard for information security) in order to comply with the Seventh Security Principle of the Act and to ensure that data and information is kept secure.

Registration Number
Z9090367

Data Controller
SDK (Environmental) Limited

SDK is committed to protecting the rights of individuals' privacy with regard to the processing of personal data and SDK's Data Protection Policy has been drafted to support that commitment



Diarmid Naim
Managing Director
20th March 2020



Policy Statement

All card processing activities and related technologies must comply with the Payment Card Industry Data Security Standard (PCI-DSS). Card processing activities must be conducted as described herein and in accordance with the standards and procedures listed in the Related Documents section of this Policy. No activity may be conducted nor any technology employed that might obstruct compliance with any portion of the PCI-DSS.

As a minimum, this policy shall be reviewed annually and updated as needed to reflect changes to business objectives or the risk environment.

1. Applicability and Availability

This policy applies to all employees. Relevant sections of this policy apply to vendors, contractors, and business partners. The most current version of this policy is available from the appointed Compliance Officer and from the Directors of the Company.

2. Adherence to Standards

Standards must be maintained for applications, network components, critical servers, and wireless access points. These standards must be maintained in line with on-going requirements of the PCI DSS Compliance. Standards must include:

- Updating of anti-virus software and anti-malware software
- Prohibition of wireless activity in the defined secure area
- Prohibition of group and shared passwords

3. Definition of Secure Area

For the sole use of this policy, the secure area is defined as an area in which payment card data is received, processed or authorized

4. Handling of Cardholder Data

The policy hereby dictates

1. No sensitive cardholder data will be stored in any format or on any media unless deemed absolutely necessary
2. No voice recordings will be made inside the secure area, be it call recording or any other recording devices
3. No verbal discussions will take place regarding payment card processing outside of the secure area
4. At all times, involvement with payment card processing will be undertaken on a need-basis
5. If deemed necessary, any distribution, maintenance, and storage of media containing cardholder data, must be controlled, including that distributed to individuals.
6. If data retention is deemed necessary, procedures for data retention and disposal must be maintained and must include the following:
 - a. legal, regulatory, and business requirements for data retention, including specific requirements for retention of cardholder data
 - b. provisions for disposal of data when no longer needed for legal, regulatory, or business reasons, including disposal of cardholder data using the following methods
 - i. cross-cut shred, incinerate, or pulp hardcopy materials
 - ii. purge, degauss, shred, or otherwise destroy electronic media such that data cannot be reconstructed
7. Printing of payment card numbers must be masked when displaying cardholder data. Those with a need to see full credit card numbers must submit a request of exception to this policy to the Data Protection Manager.
8. No sensitive cardholder data may be transported by post, fax or electronic transmission other than to input directly into the service provider facility to process the cardholder data by means of payment or refund

PCI DSS Compliance Policy

DialAPest

5. Processing of Cardholder Data

Until further notice or variation, SDK will process payments by payment card:

1. By means of a virtual terminal accessed via a web browser and accessed solely from within the secure area with no connections to other locations or systems
2. By means of a virtual terminal provided by and hosted by a PCI DSS validated third party service
3. By means of a computer that contains no software installed that causes cardholder data to be stored in any format
4. By means of a computer that is free from such devices to capture cardholder data other than manual input via a keyboard and mouse with the intention to store cardholder data
5. By means of a computer that will not transmit or receive sensitive cardholder data
6. By means of a computer that will not store cardholder data in any format
7. By means of a computer which has a fully installed and fully maintained firewall to protect cardholder data
8. By means of a computer which has a fully installed and up-to-date anti-virus and anti-malware software to protect cardholder data
9. By means of a computer which is password protected and by which the passwords are not the default as issued by the software supplier and that are changed not less than 4 times a year and immediately upon breach of security, suspicion of breach of security or a member of staff leaving with knowledge of the current password

6. System Access to Cardholder Data

Data control via the system must be maintained and must incorporate the following:

1. Access rights to privileged User IDs are restricted on the basis necessary to perform job responsibilities
2. Assignment of privileges is based on individual personnel's job classification and function
3. Prohibits the use of external storage devices of all types unless expressly authorized by the Data Protection Manager
4. Prohibits the storage of cardholder data onto local hard drives
5. Prohibits the use of cut-and-paste and print functions during any processing of cardholder data
6. Prohibits the use of any wireless technologies inside the access-controlled area
7. The secure area must strictly adhere to the policies detailed in the EMPLOYEE PERSONAL SECURITY OPERATION REQUIREMENTS POLICY – a copy is added to this policy as matter of record

7. Physical Access to Cardholder Data

Cardholder data will be processed in an access-controlled environment free from unnecessary external and internal storage devices and should incorporate the following:

1. The secure area will be secured at all times and entry will be via keypad operated door-entry system with security entrance codes
2. The security entrance code will be changed not less than 4 times a year and immediately upon breach of security, suspicion of breach of security or a member of staff leaving with knowledge of the current security code
3. Doors and windows to the secure area must be locked overnight and outside operational hours
4. The secure area will have automatic door closing and the windows will be limited to partial opening to the point of restriction of entry and exit
5. Only persons authorized to do so may enter the secure area.
6. Visitors may only enter the secure area if authorized to do so and whilst accompanied at all times by an authorized member of SDK
7. Unrestricted monitoring via camera within the secure area with recordings stored on external drives positioned outside the secure area
8. The cameras will at no time record any payment cardholder data or screens containing such data
9. The video footage will be kept for a rolling 3 month period minimum
10. Under no circumstances may mobile phones or any such mobile device capable of wireless communication enter the authorised room unless cleared to do so by the Data Protection Manager



Policy Statement

All card processing activities and related technologies must comply with the Payment Card Industry Data Security Standard (PCI-DSS). Card processing activities must be conducted as described herein and in accordance with the standards and procedures listed in the Related Documents section of this Policy.

No activity may be conducted nor any technology employed that might obstruct compliance with any portion of the PCI-DSS.

As a minimum, this policy shall be reviewed annually and updated as needed to reflect changes to business objectives or the risk environment.

8. Responsibilities

Daily operational security procedures will be maintained that are consistent with PCI-DSS compliance, including administrative and technical procedures for each of the requirements. The Data Protection Manager is responsible for overseeing all aspects of cardholder data security, including but not limited to:

1. Creating and distributing security policies and procedures
2. Monitoring and analysing security alerts and distributing information to appropriate information security and business unit management personnel
3. Regularly testing security systems and processes regarding the handling and processing of cardholder data
4. Ensuring that monitoring of access to cardholder data is undertaken
5. Creating and distributing security incident response and escalation procedures including:
 - a. coverage and responses for all cardholder data security notifications
 - b. notification if required to payment card associations and acquirers
 - c. business continuity post compromise
 - d. reference or inclusion of incident response procedures from card associations
 - e. undertaking regular and random reviews with the sole purpose to maintain PCI DSS Compliance
 - f. undertake periodic training on PCI DSS Compliance Awareness
6. Maintain a formal compliance awareness program for all employees
7. Review security logs at least daily and follow-up on exceptions

The Data Protection Manager shall

8. Maintain daily administrative and technical operational security procedures that are consistent with the PCI-DSS
9. Monitor and analyse security alerts and information and distribute to appropriate personnel
10. Administer user accounts and manage authentication
11. Monitor and control all access to data
12. Maintain a list of connected entities
13. Perform due diligence prior to connecting an entity, with supporting documentation
14. Verify that the entity is PCI-DSS compliant, with supporting documentation
15. Retain audit logs for at least one year
16. Ensure employee participation in the PCI DSS awareness program, including:
 - a. facilitating participation upon hire and at least annually
 - b. ensuring that employees acknowledge in writing that they have read and understand the company's policy regarding PCI DSS Compliance
 - c. ensure potential employees handling cardholder data are screened to minimize the risk of attacks from internal sources
 - d. ensure contractual adherence to PCI-DSS required by the service provider

Client Review Policy

DialAPest

Client Review Policy and Statement of Operational Intent

We undertake to adopt and maintain the following practices to ensure maintenance of regular constructive Review meetings with all Contracted Clients by way of the following procedures:

- Client Review meetings will be scheduled, within a two week period, within the months of January, April, July and October.
- Clients will be informed of the two week period within each quarter, in December of the preceding year.
- Quarterly Review meetings held in January, July and October will be referred to as Quarterly Contract Review Meetings. Meetings held in April of each year will be referred to as Annual Services Reviews.
- Meetings will be held within the Clients offices unless otherwise pre-arranged, however we would be delighted to host alternate or occasional meetings at our local premises.
- Agendas will be issued by SDK to the Client three weeks prior to a meeting. Clients are requested to inform SDK of any additional items two weeks prior to the meeting.
- To enable timely and positive action any added agenda items involving customer complaints, reported service delivery failures or service problems should be backed by case notes and or sufficient information to permit an investigation and submitted to SDK two week prior to the meeting in order for such complaints to be investigated.
- The date of the next meeting will be agreed at the close of each meeting, within the pre- assigned two week period.
- Minutes will be taken by SDK and issued to the Client within two weeks of the meeting. Minutes will be re-issued to the Client at the time of sending the Agenda for the following meeting.
- The Policy will be reviewed at planned intervals or if significant changes occur to ensure its continuing suitability, adequacy, and effectiveness.

Client Review Policy

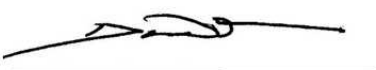
Whilst Quarterly Contract review meetings have been offered for many years now, to maintain our Customer Service Excellence accreditation we are required to formalise the process. Clients can of course decline or vary the frequency of these reviews as they require operationally or deem necessary.

This document specifies the steps we have taken to ensure that Quarterly Review meetings with Clients are timely, consistent, fair and in accordance with our contractual requirements.

The provision of quarterly documented contract review meetings supported by comprehensive, accurate service statistics and KPI reporting should ensure that service continuity and minimum standards are being tested and met.

An annual service review is we believe central to partnership working and will be attended by a Senior Company Executive and is open to Senior Client Officers, key service level partners, elected members such as Portfolio holders and interested customer focus groups, if appropriate. Services again we feel can benefit from an annual comprehensive road map and strategy reference document to structure the meeting.

This meeting can then record the groups agreed service development plans for the coming year and incorporate any required changes necessary due to political direction and or feedback from Clients using the service. Any additional aspirational improvements or enhancements should be detailed along with the setting of challenging targets, against which any added value success can be measured.



Diarmid Naim
Managing Director
20th March 2020

Privacy Policy

**DialA Pest**

What We Do With Your Data

To provide our services, we collect, store, review and transfer data relating to our customers. This information is mainly provided by you (when you book treatments, make enquiries or fill in forms on our website) but may be obtained from your Council, neighbour, landlord or tenant.

When you book our services, we will ask for your name, contact details and address of the relevant premises. We will use these for our legitimate interests in booking administration and confirmation, order fulfilment, billing, payment, delivery, after-care services and complaints and to comply with our contract with you. When we visit the property, we may take photographs inside and outside for our legitimate interests in identifying proofing issues, the extent of an infestation, room conditions or other information reasonably necessary to carry out our services or to show why we are unable to do so.

We may also ask you to complete surveys for research purposes, although you do not have to respond to them. If you give us any health-related information, we will store this and notify the technician about it if relevant to their visit, if you consent to this.

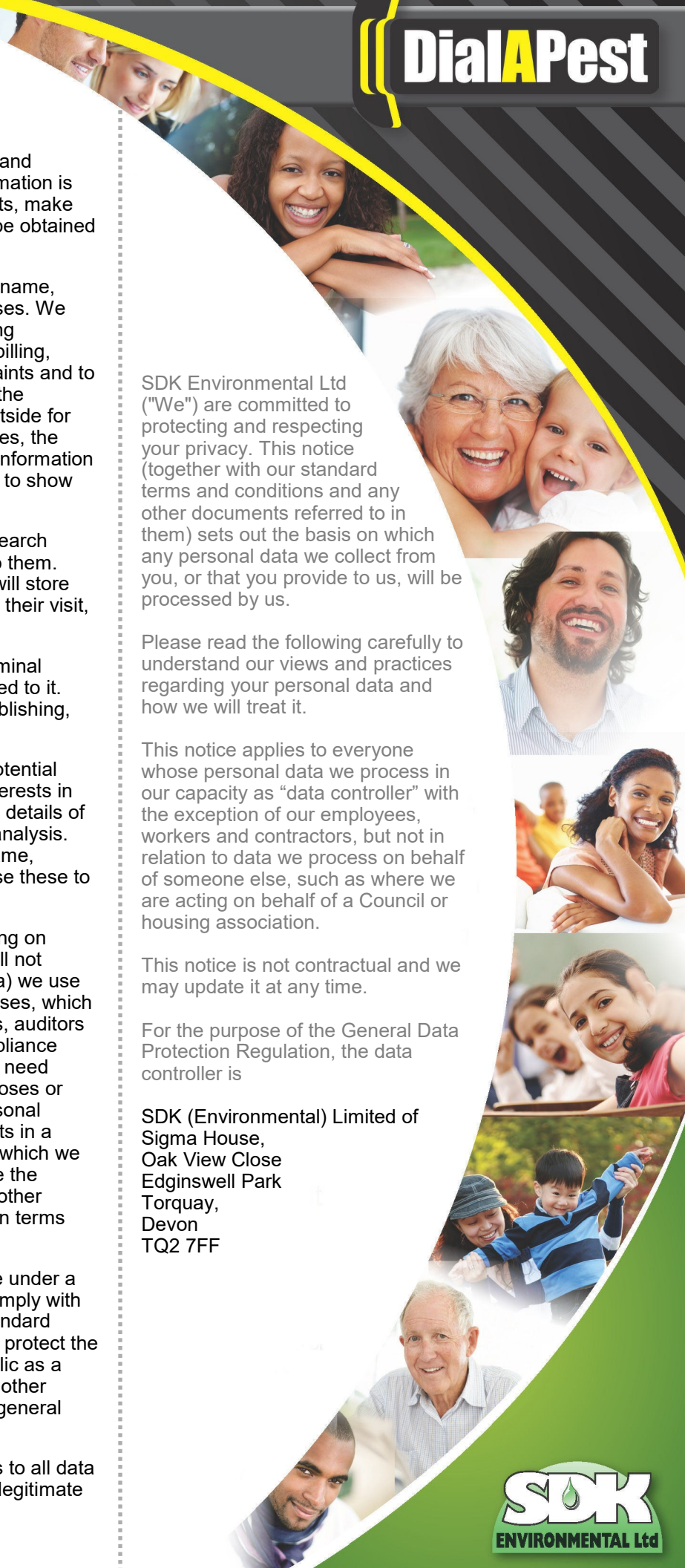
We will not store or use information about any criminal convictions or offences, unless you have consented to it. Any personal data may be held and used for establishing, exercising or defending legal claims.

We also collect contact details of suppliers and potential suppliers, which we may use for our legitimate interests in the provision of goods or services to us. We store details of potential customers but only use this for internal analysis. If you apply for a job with us, we will keep your name, contact details, current salary and CV and may use these to contact you about applicable jobs.

Where you are our customer (and we are not acting on behalf of a Council or housing association), we will not transfer your data to any third party, except that (a) we use external call centres for business continuity purposes, which is a legitimate interest, (b) our banks, accountants, auditors and insurers may require data as part of our compliance checks and legal obligations, although they rarely need specific personal data, for legitimate interest purposes or legal compliance, and (c) we may share your personal information in the context of our legitimate interests in a possible sale or restructuring of the business (for which we will share anonymised data where possible before the transaction completes but personal data with the other parties to the extent required under the transaction terms after completion).

We may also transfer your personal data if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our standard terms and conditions and other agreements, or to protect the rights, property or safety of any person or the public as a whole. This includes exchanging information with other organisations for fraud protection, credit risk and general legal compliance.

Our IT support and system providers have access to all data on our systems to provide their services to us for legitimate interests.



SDK Environmental Ltd ("We") are committed to protecting and respecting your privacy. This notice (together with our standard terms and conditions and any other documents referred to in them) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This notice applies to everyone whose personal data we process in our capacity as "data controller" with the exception of our employees, workers and contractors, but not in relation to data we process on behalf of someone else, such as where we are acting on behalf of a Council or housing association.

This notice is not contractual and we may update it at any time.

For the purpose of the General Data Protection Regulation, the data controller is

SDK (Environmental) Limited of
Sigma House,
Oak View Close
Edginswell Park
Torquay,
Devon
TQ2 7FF

**SDK**
ENVIRONMENTAL Ltd

Data About Website Use

We store data about your visits to our websites including traffic data, location data, weblogs, other communication data and the resources that you access, your IP address, operating system and browser type, for system administration and internal analysis. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our sites and to deliver a better and more personalised service. Some of the cookies we use are essential for the sites to operate.

Links On Our Website

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Where We Store Your Personal Data

The data that we collect from you as data controller will remain within the UK and EU.

Where We Act For Someone Else

If we are acting on behalf of a council, housing association or other body or company, we may have to disclose to them any information we hold about you or your property, as we act as a "data processor" for them.

Right To Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you may withdraw that consent at any time. To do so, please e-mail us at

tellus@sdkenvironmental.com.

We will then no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Marketing Correspondence

We do not send marketing correspondence to people on our database.

If You Fail To Provide Personal Information

If customers fail to provide certain information when requested, we may not be able to perform the contract we have entered into with them. Depending on the specific data, why we need it and what risks the provision of it poses to your rights and freedoms, we may have to stop acting for you in this situation.

Change Of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

Automated Decision-Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Privacy Policy

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How Long Will We Use Your Information For?

Due to our use of pesticides, we keep all customer records indefinitely.

If you apply for a job with us, we will keep your name, contact details, current salary and CV on file for up to three years, although we may delete it before then if we do not anticipate any need for recruitment applicable to you within this time.

We hold other personal data until we are satisfied that there is no longer any purpose for retaining it. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your Duty To Inform Us Of Changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Complaints

If you are unhappy with any aspect of our processing of your personal data, we ask that you talk to us about it first and discuss your concerns with our Data Protection Manager. If you are not satisfied with the outcome, you may lodge a complaint with the Information Commissioner's Office.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to

tellus@sdkenvironmental.com



Diarmid Naim
Managing Director
20th March 2020

**DialAPest**

Rights Of Access, Correction, Erasure and Restriction

You have a number of rights under the GDPR:

- ◆ the right to access personal data we hold;
- ◆ the right to ask us to rectify or complete our records;
- ◆ the right to ask us to delete personal data;
- ◆ the right to object to us processing your personal data;
- ◆ the right to restrict our processing; and
- ◆ the right to ask us to transfer your personal data to another organisation.

These are not absolute rights and are subject to specific conditions and depend on our processing purposes.

If you are interested in using any of these rights, please e-mail us at

tellus@sdkenvironmental.com

for more information.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**SDK**
ENVIRONMENTAL Ltd