

Ebbon

— GROUP —

Title: Environmental, Social and Governance Policy Statement

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Environmental, Social & Governance Policy Statement

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1.1	11/04/23	SM	Amends following discussion for further review
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1.0 Definitions & Abbreviations

CEO – Chief Executive Officer

BCP – Business Continuity Plan

ESG – Environmental, Social and Governance

The Company – Ebbon Group Ltd (including trading as Ebbon Automotive), Ebbon Intelligence Ltd Licence Check Ltd and DriverCheck Ltd

Companies Act - Companies Act 2006

Directors – the executive fiduciary directors (currently the 2 joint CEOs), the Managing Directors of Ebbon Automotive & Ebbon Compliance & the Group Technical Director

Interested Parties – the owners, the employees, the customers & suppliers of the Company, the relevant authorities in the territories in which the Company operates and the community at large (including charities)

Supply Chain – the direct suppliers to the Company and their suppliers

2.0 Introduction

This document outlines the Company's strategy and approach to the sustainable and environmentally aware pursuit of its business activities as well as the maintenance of ethical conduct and professional standards in the way that it deals with its Interested Parties.

The document acts as a framework to guide policy across the Company. Reference will be made to other policy documents which will contain more detailed information. This document should be read in conjunction with those associated policy documents.

Reference will also be made to Ebbon Life, which is a division of the Company that is charged with overseeing employee welfare and the interaction of the individual group companies with their local communities and wider charitable and welfare objectives.

The Company aims to implement the highest ESG standards appropriate to its size and industry sectors. The prosperity of the Company and of the communities within which it operates requires a commitment by it to the sustainable, measurable and reportable management of its activities.

Rapidly developing legal and voluntary frameworks, stakeholder demands and increasing environmental concerns, all mean that ESG is a top priority for businesses. To keep pace with this change, the Company will:

- keep abreast of the most up to date information available to it when formulating ESG related policies; and
- ensure compliance with all ESG related laws; and
- avoid ESG related reputational damage while meeting its statutory duty (under section 172 of the Companies Act) to promote the Company's success; and
- actively seek to mitigate its carbon footprint and harmful pollutants associated with its activities through improved planning, recycling and active waste reduction; and
- encourage colleagues to achieve excellence in the workplace whilst actively supporting their health and welfare; and
- seek to engage positively with all Interested Parties; and
- conduct its business with integrity and high standards of business ethics, through appropriate structures, systems, processes and procedures; and
- take action to ensure that the Company continues to satisfy stakeholders and places itself in the best position for long term, sustainable development: and
- Ensure that the Company maintains exemplary board stewardship and management accountability; and
- Ensure that the Company adopts and implements adequate internal controls, processes, procedures and proactive risk management: and
- Ensure that the Company cultivates strong customer relationships through transparency, open communications and responds to customer input on any ESG issues: and
- Develop and maintain business continuity plans that ensure that none of the Interested

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Parties are adversely affected by any incident

The Directors have decided to develop a robust and transparent ESG strategy that goes beyond their Companies Act duty. It affects and enhances all areas of the Company's business.

2.0 General ESG Principles

In fulfilling the ESG Commitment, the Company seeks to:

- establish and maintain high standards of business ethics: and
- comply with all applicable local and national laws, rules, regulations and other measures having the force of law that are relevant to any aspects of its ESG Commitment; and
- where it is practicable and appropriate to do so, establish and meet standards relevant to any aspects of its ESG Commitment which are higher than the standards imposed by law: and
- ensure its employees, in carrying out their duties, adhere to the principles and objectives of this document and related policy documents: and
- ensure that its Supply Chain meets or exceeds the principles herein.

This document will be regularly reviewed by the Directors and updated as necessary.

This document will be published on the Company's public website(s).

3.0 Training

Suitable training will be provided to all employees to ensure that they are familiar with, and work in accordance with this policy. This document and all related policies form part of their induction and ongoing work-related training.

Specific training in the following areas will be provided on an annual basis by external specialists with employee participation: -

- Anti-bribery and corruption
- Anti-slavery and human trafficking
- Data protection
- Data & systems security

Any scored assessments will be recorded and reviewed by management. Where weaknesses in understanding or application become apparent, individual employees will be scheduled for further training.

4.0 Supply Chain

The Company expects its Supply Chain to adopt and implement at least similar ESG policies in their own businesses and to achieve the reporting standards described herein.

4.1 Environmental

The Company has identified and approved the following objectives as a framework for the introduction of practices to implement the environmental aspects of the ESG commitment: -

- Identifying and managing environmental risks and hazards within the workplace
- Introducing and observing management practices and procedures during business planning to include due consideration of any associated environmental factors
- Promoting a culture of environmental awareness amongst our employees

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- Promoting environmental principles to and providing internal training for all employees as appropriate to enable them to carry out their job functions in a manner that shows care for the environment
- Via Ebbon Life communicating on Company related environmental matters freely with employees, customers and members of the public
- Carrying out environmental audits as an integral part of the internal and Supply Chain audit schedules to test/measure compliance with the Company environmental management policies and report on the same to relevant Interested Parties
- Involving relevant Interested Parties in the implementation of these ESG objectives
- Continuously improving environmental performance and integration of recognised environmental best practices appropriate into business operations
- Measuring, and acting to reduce, the carbon footprint of business activities with a view to achieving “net zero” status across the Company and, in so far as the Company is able to influence it, its Supply Chain
- Protecting the environment by preventing pollution of land, air or water via leakage of liquids gases or solids
- Swiftly responding to accidents or incidents that have a potential to threaten the environment
- Employing appropriate best practice waste management techniques from ISO14001
- Encouraging development of products, processes and equipment with concern for the future of the environment
- Giving due consideration to environmental issues and energy performance in the acquisition or refurbishment of existing buildings, and the design and location of new buildings
- Taking steps to improve environmental efficiency of business travel, including due consideration as to whether to avoid travelling altogether by hosting remote meetings, the use of public transport, rail rather than planes and an electric car fleet as far as possible, with the option of hybrid where fully electric is not practicable
- Where possible, using recycled or ecologically friendly paper
- Reducing consumption of resources and improving efficiency of those resources by printing double sided or avoiding printing where practicable
- Where possible, reducing consumption of resources by
 - fitting LED lighting when replacing bulbs
 - ensuring that lights are turned off in empty areas
 - working to reduce heat loss through open doors or poorly sealed windows
- Ensuring that any promotional and marketing materials and bags are recyclable or reusable

4.2 Social

The Company has identified and approved the following principles to guide the implementation of the social aspects of the ESG Commitment:

- Prohibiting, by policy, any infringement of civil or human rights by the Company, its officers and employees, by prohibiting any participation in or connection with any modern slavery, child labour or human trafficking
- In all cases by only engaging with a Supply Chain that supports these objectives
- To regularly review and publish statements that support these policies
- While the Company doesn't directly purchase or process minerals or derivative materials as listed in the EU Regulation 2017/821, avoid the indirect purchase or use of conflict minerals or derivatives by including appropriate questions in Supply Chain Audits and monitoring/acting on response
- Avoiding investment in industries with a negative social impact, for example, gambling, tobacco, pornography or weapons manufacture/sales
- Maintaining an inclusive and collaborative workplace where the wellbeing of employees is a high priority including employees' work life balance needs
- Providing and maintaining a working environment free from all forms of discrimination, harassment and bullying in line with prevailing legislation
- The Company will not select, engage, place, promote, transfer or compensate or otherwise treat or deal with any employees on the basis of anything other than capability and work ethic

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- Creating a positive and rewarding workplace for the Company's employees under the Ebbon Life initiative
- Providing a fair and rewarding remuneration policy linked to business and personal performance to include compliance with generally accepted published living wage guidelines and a sensible approach to working hours and attendance, leave, sick leave and other aspects of wellbeing
- Encouraging employees to participate in appropriate further education and work-related training which supports their professional development, allowing paid time-off where circumstances permit, including any education or training that the Company itself is able to provide in-house
- Providing subsidised employee benefits, to include health benefits under the Ebbon Life initiative in order to positively contribute towards the mental and physical health and welfare of employees
- Making positive contributions to the local community and to adopted charities and to worthy causes – such charities and causes to be identified under the Ebbon Life initiative
- Encouraging employees to participate in and contribute to activities which benefit the welfare of members/sections of the local community, allowing paid time-off for the employees where circumstances permit
- Providing sponsorship for initiatives run by or benefiting local charities, clubs or other local worthy causes

4.3 Governance

The Company has identified and approved the following as a framework for the introduction of practices to implement this ESG commitment: -

- The appointment of a governance team with the authority to establish and maintain an internal audit schedule to moderate compliance with governance policies and report in line with the metrics defined in the associated policies
- Prohibiting any bribery or corruption of, or by, any of its officers, employees, or the Supply Chain in accordance with legislative and regulatory requirements
- Investing in appropriate governance training for all employees and audits of the Supply Chain
- Prohibiting any money laundering by any of its officers, employees or the Supply Chain
- Avoiding conflicts of interest and establishing clear rules for employees to follow to identify possible conflict situations, how to report these and steps to be followed to address them
- Ensuring compliance by the Company with workplace health and safety laws and standards, to mitigate risks to health and safety in the workplace
- Maintaining suitable privacy and data security measures in respect of all Interested Parties in/of the Company
- To establish clear and effective governance for ESG, promoting the use of best practice on corporate governance when relevant, and setting measurable goals and establishing accountability throughout the Company
- Ensuring that the Company mitigates risk exposure and builds the resilience of its business to emergency, disaster or other circumstances that could otherwise adversely affect the business or prevent the delivery of services to customer, as part of which the Company has implemented, will maintain and regularly test a BCP

5.0 Measuring and reporting compliance

The Directors will adopt and implement (and vary from time to time as they deem necessary) detailed clear written requirements for the Company to monitor and report on the Company's compliance with this ESG Policy Statement, including:

- metrics and methods for measurement of compliance by the Company within each key supporting policy document or statement sufficient to show trends over time and progress against established objectives and any targets; and

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- requirements as to reporting to customers, employees and stakeholders at regular intervals not exceeding 12 months on the information derived from that measurement and on disclosures on ESG issues.
- The Directors will publish to employees, customers and stakeholders all of those written requirements when they are required, scheduled for release and whenever they are varied.

6.0 Status of this ESG Policy Statement

The Directors endorse this document are fully committed to its implementation.

This document will be regularly reviewed and updated as necessary.

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