

# Ebbon

GROUP

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ANTI-SLAVERY POLICY STATEMENT

**Change Log**

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## 1 Overview

The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Company does not meet the statutory threshold under Section 54 of the Modern Slavery Act 2015 requiring the publication of a formal statement for each completed financial year.

## 2. Abbreviations/Definitions

### 2.1 Abbreviations

CEO – Chief Executive Officer

MD – Managing Director

ESG Policy – the Company's Environmental, Social and Governance Policy.

### 2.2 Definitions

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

**Directors** – means the executive fiduciary directors (currently the two joint CEO's) the Managing Directors for Ebbon Automotive, Licence Check and DriverCheck

**Supply Chain** – means the direct suppliers of goods or services to the company and their suppliers

**Act** – means the Modern Slavery Act 2015 including any updates or revisions thereto

**Employees** – means permanent staff plus those people engaged by the Company on a temporary or fixed term contract, seconded staff, volunteers, agents and sub-contractor personnel acting for and on behalf of the Company.

**Associated Person** – means a third party who performs services for and on behalf of the Company.

**Modern Slavery** - the offences and definitions found in Sections 1 and 2 of the Act.

## 3 Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with the spirit and intent of the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to Employees and Associated Persons.

## 4 Responsibility for the policy

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees, our customers and members of the supply chain are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, enhancements or questions about the Policy are encouraged and should be addressed to the Directors or can be emailed to [compliance@ebbon-group.com](mailto:compliance@ebbon-group.com).

## 5 Compliance with the policy

Employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our management or control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. Concerns may also be reported to [compliance@ebbon-group.com](mailto:compliance@ebbon-group.com)

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director or report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

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If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Whistleblowing Procedure, which can be found in the current employee handbook.

### 6 Organisational structure and supply chains

#### A. Our Business Activities

This Statement covers the business activities of the Company which are as follows:

- hosted software services within the United Kingdom and Europe in connection with the order to delivery process of lease vehicles and movements of vehicles within the global fleet sector; and
- hosted software services in the United Kingdom to allow third party customers to monitor and report upon driver and associated vehicle & associated equipment compliance as part of their wider duty of care obligation.

In order to provide these services, the Company procures the following: -

- computer software and hardware from recognised manufacturers who have committed to the prevention of modern slavery and human trafficking and are obliged to publicly affirm such commitment; and uses hosting services provided by Microsoft in the United Kingdom and the EU with Microsoft publishing clear evidence of compliance with the requirements of the Modern Slavery Act 2015 <https://www.microsoft.com/en-gb/about/regulatory-reporting/>
- incorporates data provided under licence from the private sector and Government Agencies who are committed to tackling modern slavery and human trafficking in all its forms; and
- uses other UK and EEA based corporations for complimentary services including hosted data services and equipment who commit to the prevention of slavery and human trafficking.
- Commissions external anti-slavery and human trafficking training for Group HR management, directors and senior managers.

#### 6.1 Countries of Operation

The Company currently operates in the following countries:

- The United Kingdom
- The European Union

#### 6.2 Risk Assessment

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

The Company has considered our business suppliers and supply chain in light of the research undertaken by the **Walk Free Foundation and published in the Global Slavery Index 2018.** <https://www.globallslaveryindex.org/2018/findings/country-studies/united-kingdom/>

This high-level research indicates that the only identified risk in our supply chain lies in the provision of IT and communications hardware where exploitation has been reported in Malaysia and China.

We do not source any minerals in the provision of our services.

#### High Risk Activities & Responsibility

The following activities are considered to be at risk of modern slavery or human trafficking: -

- The purchase of computer hardware and mobile telephones

Responsibility for the Company's anti-slavery initiatives is as follows:

## ANTI-SLAVERY POLICY STATEMENT

- Policies: at Group level the Group Directors with the assistance of the Senior Management Team are responsible for creating and reviewing policies. The process by which policies are developed is to consider best practice and adapt this to the needs of the Company. The Directors are responsible for reviewing and updating this Statement.
- Risk assessments: the Managing Director in each case is responsible for risk assessments in respect of human rights and modern slavery by considering the items or services to be supplied in relation to the physical location and geography of the supplier and measuring this against the published risk data provided by the Walk Free Foundation's Global Slavery Index.
- Due diligence: the Managing Director in each case is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking that relate to the Company and its activities.

### **7 Supplier Due Diligence Processes for Slavery and Human Trafficking**

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes using providers of hardware and services that have a published anti-slavery and human trafficking policy and commit to stamping out such activities. In the case of our smaller suppliers and partners, we will use organisations that are known to the Company and whom we have reasonable cause to believe are not promoting, supporting, condoning or benefitting from activities or business practices associated with slavery or the unconscionable exploitation of other persons and who accept the principles found in this statement.

Where we identify a supplier is in breach of the principles found within this statement, we will formally request them to modify their conduct. Should they fail to do so, we will terminate arrangements with them immediately or at the earliest possible opportunity where immediate termination is impossible or impractical.

Key supply chain accounts will be reviewed annually to ensure continued compliance with the Act.

### **8 Training, Communication & awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

All employees are required to read and signify acceptance of this Policy document as part of their induction. This forms part of their employment record.

The Company requires senior management and any others with recruitment or procurement responsibility to undergo annual training provided by external third-party specialists in this area. Attendance and any test scores are formally recorded and will be shared with Group HR and the senior management team.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **9 Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 10 Review of Policy

This policy will be subject to regular review and approval by the senior management team as part of the Company's ESG commitment.

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