Ebbon GROUP

Title: Ebbon Group Environment & Sustainability Policy

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Ebbon Group

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1.0 Definitions & Abbreviations

1.1 Abbreviations

MD – Managing Director

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

1.2 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 and Ebbon Compliance and the Group Technical Director

Environment & Sustainability Policy (ESP) – means this policy

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

Employees – means permanent staff (including the Directors) 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

2.0 Introduction

This Policy sets out the Company's commitment to reducing its environmental impact and continually improving environmental performance as an integral part of the business strategy and operating methods. This ESP is associated with the Company ESG Statement.

Although the Company is principally a technology company providing services to our thirdparty customers and to that extent is not engaged in manufacturing or other processes that require the direct consumption or processing of raw materials, direct damage to the environment or threat to nature, it nonetheless recognises that its operations will have an environmental impact. To mitigate this, the Company is committed to: -

- Complying with all relevant regulatory requirements as a minimum level of commitment
- Continually improving and monitoring pollution and environmental performance to reduce any significant detrimental impact to the maximum extent possible
- Incorporating environmental factors into business decisions
- Increasing Employee awareness and training in environmental issues and the environmental effects of their activities
- Working with the Supply Chain to improve their environmental performance
- Using local labour and materials where possible to reduce the Company's CO2 and help the community
- Communicating our business environmental aims and objectives and progress against targets to Employees, customers and stakeholders through the Ebbon Life Portal
- Monitoring progress and setting and reviewing environmental improvement targets and objectives on an annual basis though the setting of Key Performance Indicators and auditing

The Directors with support from the Company's department heads have overall responsibility and authority to ensure that this Policy is effectively implemented and delivered throughout the Company. All employees have a responsibility in their area to ensure that the aims and objectives of this policy are met.

Failure to comply with this Policy, supporting policies and supporting procedures, may result in disciplinary action being taken.

This Policy and the Company's performance in meeting its requirements will be monitored and reviewed as a minimum, on an annual basis.

3.0 Scope

The policy applies to all Employees, stakeholders, consultants, contractors and agency workers. The Company expects the key providers in the Supply Chain to demonstrate environmental awareness and have suitable environmental and sustainability policies in place that are consistent with the aims and objectives of this ESP.

4.0 Specific Policy Objectives

Net Zero Status

• The Company will pursue a 'net zero' strategy across all divisions in order to offset carbon produced in the course of its business activities. The objective is to attain this status across Ebbon Group by the end of the year 2025.

Paper & Cardboard Packaging

- The Company will minimise the use of paper in the office by reusing and recycling all paper where possible.
- The Company will seek to buy recycled and recyclable paper products where cost effective to do so.
- Reduce consumption where possible using alternative methodologies that discourage print in favour of digital
- All cardboard packaging will be recycled in line with local authority guidelines
- Packaging materials used by the Company will use wholly or partially recycled content
- Marketing materials to be provided in electronic images wherever possible and practical.
- User and service manuals to be provided in electronic format

Energy & Water

- The Company will seek to reduce the amount of energy used as much as possible by switching off equipment when not in use and adjusting device controls to regulate as required
- The energy consumption and efficiency of new products will be taken into account when purchasing new or replacement equipment
- The Company will seek to reduce water consumption wherever possible
- All bulbs and lighting will be replaced with low energy options where this is feasible
- Employees will be actively encouraged to switch off lights and equipment when not in use

General Office Supplies

- The Company will reuse and recycle rather than purchase new where possible
- The Company will evaluate if renting/sharing is an option before purchasing equipment and favour more environmentally friendly and efficient products wherever possible

• Electrical products will be recycled in line with security requirements and Government guidelines

Transportation

- The Company will promote the use of business travel alternatives such as e-mail or video/phone conferencing
- The Company will encourage employees to use public transport and rail rather than aircraft
- Company vehicles will use electricity or hydrogen fuel cells as a source of power in preference to fossil fuels. Where this is impractical, hybrid vehicles will be actively encouraged within the Company Car Policy
- The Company will provide training to allow employees to save fuel on all journeys by car
- The Company will recommend that all grey fleet vehicles to be used on company business should have the lowest Co2 possible where practical to do so

Maintenance & Office Services

- Cleaning materials used will be as environmentally friendly as possible
- The Company will only use licensed and appropriate organisations to dispose of waste

5.0 Monitoring and Review

The Directors are responsible for the monitoring and enforcement of this policy.

The ESP will be reviewed bi-annually by the Directors.

The internal systems and controls used to ensure that this policy is being observed by Employees and third parties will be regularly reviewed and audited as a formally timetabled and reported activity with the results provided to the Directors and made available to customers and other stakeholders. The regular review will include the following activities:-

- Internal audits on levels of expenditure on consumables across the Group
- Reports from Fleet Management and Grey Fleet Management Systems to be regularly reviewed (at least annually) by Senior Management
- An active programme to remind employees to recycle in line with local authority guidelines
- Regular review of travelling expenses and Company Car Policy to ensure that key objectives are being met
- An annual report on the Ebbon Life Portal to outline progress against environmental goals
- Certification on the Ebbon Life Portal to show net zero status

End of Document