

# Ebbon

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Procedure Name	Ebbon Group Anti-Bribery Policy
Version	5.0
Document Owner	Ebbon Group CEOs
Document Classification	PUBLIC

### Change Log

Version	Date	Authored By	Authorised By	Details
0.1	25/11/2021	Dave Minto		Draft for review
1.0	02/12/2021	Dave Minto		Reviewed by Terry Hiles and Steve Molyneux. Published.
2.0	21/12/2022	Anna Standley		Reviewed by Steve Molyneux
3.0	13/04/23	SM/TH		Re-drafted in response to customer feedback
3.1	30/05/23	SM/TH		Reviewed by TH & SM prior to submission for approval
3.2	03/08/2023	SM		Removed need for questionnaires as deemed to be excessive – amended email sampling to be in case of suspicion only
3.3	19/09/2023	SM		Added DriverCheck and removed reference to Ebbon Compliance
3.4	21/02/2024	TH		Made changes to the hospitality/entertainment Gift Register to address the £100 limit – this considered to be unrealistic in the current economic climate. Added overnight stay as qualifier. Change requested by ESG Management Team.
4.0	06/03/2025	Lauren Miller	vCISO	Document rebranded and version control amended, and document published
4.1	13/04/2026	Lauren Miller		Annual review
4.2	09/06/2026	Lauren Miller		Updates to policy following review by Group HR Manager
5.0	16/06/2026	Lauren Miller	Ebbon Group CEOs	Document authorised for publishing

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## 1.0 Overview

Bribery and corruption are criminal offences that can result in fines, imprisonment, business exclusion and serious reputational damage.

The Company prohibits bribery in any form and requires everyone connected with its business to comply with applicable anti-bribery laws and the highest ethical standards in every country in which it operates.

The Company has zero tolerance for bribery and corruption by Employees, Associated Persons or anyone acting on its behalf.

The Company maintains procedures to prevent bribery, including risk assessment, due diligence, training, monitoring and review.

## 2.0 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

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

**Directors** – means the two joint CEOs of Ebbon Group and the Managing Directors of Ebbon Automotive, Ebbon Intelligence, Licence Check and DriverCheck.

**Supply Chain** – means the Company’s direct suppliers of goods or services and their suppliers.

**Bribery Act (or Act)** – means the Bribery Act 2010, as amended from time to time.

**Employees** – means permanent employees and individuals engaged by the Company on a temporary or fixed-term basis, including secondees, volunteers, agents and subcontractor personnel acting for or on behalf of the Company.

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

**Facilitation Payments** – means small bribes paid to bypass or speed up administrative processes.

**Gift** – includes, but is not limited to, consumable items, jewellery, electrical items, non-corporate clothing, tickets to events where the sponsor does not attend, prizes, discounted services, holiday accommodation, travel and charitable donations.

**Gift Register** – means the centrally maintained log of gifts and hospitality given or received above £100.

**Hospitality** – includes accompanied ticketed or sponsored events (such as concerts or sporting events), travel, accommodation, meals and refreshments paid for by the provider.

## 3.0 Definition of Bribery & General Prohibition

For the purposes of this Policy, bribery means offering, promising, giving, requesting or accepting anything of value to improperly influence a decision. The Bribery Act prohibits both offering and accepting bribes, and the Company treats both as equally unacceptable.

A bribe may include money, gifts, hospitality, services, job offers, charitable donations, political contributions or any other advantage intended to secure an improper business, regulatory or personal benefit.

Improper performance means acting other than in good faith, impartially or in accordance with a position of trust. The relevant test is what a reasonable person in the United Kingdom would expect, even where conduct takes place overseas, unless local law expressly permits or requires it.

Whether a gift or hospitality amounts to a bribe will depend on the circumstances, including intent, timing, value and proportionality.

The Bribery Act applies in the United Kingdom and may also apply to conduct outside the United Kingdom where the organisation has a sufficient connection to the UK.

**Except as allowed under this Policy, no Employee or person acting on the Company's behalf may directly or indirectly offer, give, request or accept any bribe, gift, loan, payment, reward or other advantage to obtain a commercial, contractual, regulatory or personal benefit.**

Many customer contracts require any Employee or subcontractor found guilty of fraud or corruption to be removed from relevant roles. Where no suitable alternative role exists, dismissal for gross misconduct may follow.

Anyone who is unsure whether conduct may amount to bribery, or who becomes aware of a concern, must raise it with their line manager or through the reporting procedure below. Failure to do so may result in disciplinary action.

## 4.0 Associated Persons

The Company may be liable if an Associated Person commits bribery or corruption on its behalf, even if the Company was unaware of the conduct.

Third parties acting for or on behalf of the Company must be subject to appropriate due diligence before and during their engagement with the Company.

## 5.0 Public Officials

The bribery of any public official in the United Kingdom is an offence under the Bribery Act. The Act applies equally to the public and private sectors.

The Act also makes it an offence to offer, promise or give any financial or other advantage to a foreign public official to influence them in the performance of their duties. This includes elected or appointed officials and those performing legislative, administrative or judicial functions, including in local government and state-run bodies.

Any attempt to obtain or retain business or an advantage to the Company in the conduct of business by bribery of a foreign public official is expressly prohibited.

## 6.0 Facilitation Payments

Facilitation payments made to speed up administrative processes, approvals or clearances are strictly prohibited, regardless of local custom or practice.

Lawful fast-track fees for priority services may be accepted only where they are transparent, officially authorised, available to others on the same basis, and paid to the authorised collecting body.

## 7.0 Political Contributions

The Company has no political affiliations and does not make political donations or contributions.

## 8.0 Charitable Contributions

Through the Ebbon Life initiative, the Company supports charities and social initiatives as part of its commitment to community wellbeing.

Charitable donations must comply with the Company's published [Ebbon Group ESG Policy \[PUBLIC\]](#) and must never be made or received with the expectation of any improper advantage.

## 9.0 Suspected Bribery

Suspected bribery will be investigated under the Company's disciplinary procedures. Proven wrongdoing may result in disciplinary action, dismissal or termination of a business relationship.

## 9.1 Investigation Process

All allegations or suspicions of bribery or corruption will be investigated promptly, fairly and proportionately. Investigations will normally be led by Compliance, supported by HR and, where appropriate, Legal or Internal Audit. External investigators may be appointed where independence or specialist support is required. Directors will be informed of material cases. All investigation reports are stored in a secure confidential area of SharePoint where access is limited to only Compliance, HR and The Ebbon Group CEOs. Retention is in line with Data Protection legislation.

Investigations will be handled confidentially on a need-to-know basis. Employees must cooperate fully and must not disclose investigation details without authorisation. Where potential criminal or regulatory breaches are identified, the Company may refer the matter to the relevant authorities and will cooperate with any external investigation.

Following an investigation, the Company may take disciplinary, contractual or control improvement action as appropriate. Outcomes are recorded and stored securely by the Ebbon Group HR Manager. s

## 10.0 Gifts and Hospitality

Reasonable and proportionate gifts or hospitality given or received as genuine gestures of courtesy or appreciation are not, by themselves, bribery, provided they are properly recorded where required.

Gifts and hospitality must be modest, appropriate, reasonable and infrequent, and must not influence, or appear to influence, business decisions.

Any gift or hospitality that could be viewed as a bribe, a conflict of interest or otherwise damaging to the business must be avoided.

Cash or cash equivalents, including vouchers and gift cards, must not be accepted and must be reported to the Directors immediately.

### 10.1 Notification and Approval

Employees must obtain approval in line with the table below. Where the value of a gift is unclear, they should ask the provider or estimate its UK market value.

Estimated Value (given or received)	Approval required before acceptance	Notification or record required before acceptance
Gift less than £100	Self-approved subject to overall policy compliance	None required
Gift more than £100	Responsible manager in writing	Gift Register
Hospitality or entertainment (no overnight stay)	Self-approved subject to overall policy compliance	None required
Hospitality or entertainment including an overnight stay	Responsible manager in writing	Gift Register
International travel and accommodation (any)	Director	Gift Register

CEO or MD (any of the above, at any value)	Self-approved subject to overall policy compliance	Gift Register
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Gifts over £100 must not be given without prior written approval from a responsible manager and must be recorded in the Gift and Hospitality Register.

Gifts over £100 must not be accepted without prior written approval from a responsible manager.

Hospitality involving an overnight stay requires approval and entry in the Gift Register. Hospitality without an overnight stay has no fixed monetary limit but must remain reasonable and proportionate. Excessive or disproportionate hospitality must be declined and reported.

Gifts and hospitality must never be offered, requested or accepted in return for an advantage. Repeated or cumulative gifts below the threshold, or hospitality that is disproportionate to the relationship or seniority involved, will be treated as outside acceptable limits.

Any gift above the stated limit, or hospitality above £500, will normally be inappropriate unless there is a clear and legitimate business justification.

Failure to comply with this Policy may result in disciplinary action or the termination of third-party contracts.

The Gift and Hospitality Register is managed and maintained by the Ebbon Group Finance Team.

In the event a risk assessment is required, this can be completed by a Managing Director or Ebbon Group CEO with support from the Compliance team as required.

## 10.2 Other Prohibited Gifts and Hospitality

Some gifts or hospitality may still be unacceptable even if they fall within the stated limits. These include:

- Items that are indecent
- Items that may be considered offensive or inflammatory
- Items that are pornographic in nature

## 11.0 Training and Publicity

Anti-bribery and corruption training will be provided at induction, and completion will be recorded on the Employee record.

Employees must also complete annual online refresher training, with completion reported to HR.

Training is mandatory and failure to complete it may result in disciplinary action.

The Supply Chain will be made aware of this Policy and may, where appropriate, be required to complete equivalent training or provide evidence of their own arrangements.

Customer contracts may include specific anti-bribery and corruption obligations.

## 12.0 Reporting suspected bribery and corruption issues

Employees must report any suspected bribery promptly to Compliance. Reports will be treated confidentially, assessed and escalated as necessary. If the concern involves Compliance or senior management, it must be reported directly to the joint CEOs.

Employees are reminded that the Company’s Whistleblowing Policy is available separately.

## 13.0 Record Keeping

The Company will maintain accurate records and appropriate controls for payments, expenses, charitable donations, and gifts and hospitality that exceed the published thresholds.

Managers must record all gifts and hospitality above the relevant threshold in the Gift Register.

The Gift Register and related records may be reviewed by the Directors at any time and form part of the internal audit programme.

## 14.0 Monitoring and Review

This Policy will be reviewed regularly and may be amended by the Company as required.

The Directors are responsible for monitoring and enforcing this Policy.

The Compliance team is responsible for publishing and maintaining access to this Policy.

Compliance with this Policy will be reviewed and audited regularly, with results reported to the Directors. Reviews may include:

- Review of the Gift Register
- Sampling Employee expense claims and receipts
- Review of induction and training records and results
- Contract reviews
- Sampling invoices and purchase orders
- Email sampling where a breach of this Policy is suspected

## 15.0 Employees

All Ebbon Group employees are required to confirm they have read and understood this Policy

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