

# Ebbon

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### Change Log

Version	Date	Authored By	Authorised By	Details
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1.3	25/07/2024	SM		Annual Review – no changes
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2.2	10/06/2026	Lauren Miller		Further updates following review from Group HR Manager
3.0	16/06/2026	Lauren Miller	Ebbon Group CEOs	Document authorised for publishing

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## 1.0 Definitions

**CEOs** – Chief Executive Officers

**Ebbon Group Ltd** – means Ebbon Group Ltd, including trading as Ebbon Automotive, Ebbon Intelligence Ltd, Licence Check Ltd and DriverCheck Ltd.

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

**Employees** – means permanent, fixed-term and temporary staff, third-party representatives, sub-contractors, agency workers, volunteers, interns and agents engaged by the Company in the UK or overseas.

**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

**NCA** – the National Crime Agency

**B2B** – Business to Business

## 2.0 Policy Statement

**Ebbon Group Limited** is committed to preventing money laundering and terrorist financing through risk-based assessment, due diligence, monitoring, training and appropriate anti-fraud, anti-corruption and anti-bribery controls.

*As the Company may process transactions exceeding £10,000, it maintains appropriate anti-money laundering controls in line with applicable legal and regulatory requirements.*

Failure to comply with this Policy may expose the Company and individuals to legal, regulatory, financial and reputational risk, and may result in disciplinary or contractual action.

## 3.0 Purpose

This Policy supports the Company's compliance with applicable anti-money laundering, counter-terrorist financing and financial crime requirements in the jurisdictions where it operates or conducts business, including the UK, EU and EEA where relevant.

The Company maintains risk-based controls, employee training and reporting arrangements to identify, assess, mitigate and report money laundering, terrorist financing and related financial crime risks involving the Company, its Employees, clients, customers, suppliers and other relevant third parties.

## 4.0 Scope

This Policy applies to all Employees and the Company's Supply Chain. Adherence to this Policy is mandatory and non-compliance may result in disciplinary or contractual action.

## 5.0 Money Laundering Overview

**Money laundering** refers to the process of concealing or obscuring the origin of funds acquired through criminal activities, including terrorism, corruption, or fraud. These funds are subsequently transferred through legitimate businesses or channels to create the appearance of lawful ownership.

## 6.0 Relevant Acts and Regulations

The Company remains fully aware of applicable legislation in force. Further information is provided in the appendix.

## 6.1 Written Risk Assessment

The Company uses a custom risk assessment template to evaluate risks related to money laundering and terrorist financing, alongside standard procedures. A written assessment is available for supervisory authorities upon request.

## 7.0 Objectives

To prevent financial crime and money laundering within the organisation, the Company aims to:

- Establish and maintain policies, controls and procedures to mitigate and effectively manage the risks of money laundering and terrorist financing
- Prohibit cash payments.
- Maintain controls and procedures to detect and report suspicious activity.
- Conduct periodic risk assessments and reviews of AML and terrorist financing controls.
- Implement procedures to enable the reporting of suspicions of money laundering.
- Maintain record keeping procedures.
- Utilise employee screening during the recruitment process to ensure due diligence.

## 8.0 Procedures and Controls

Applicable anti-money laundering, counter-terrorist financing and financial crime requirements expect organisations to maintain proportionate, risk-based policies, procedures and controls. These controls include:

- Risk assessment
- Monitoring, management and internal communication of policies and controls
- Record keeping
- Staff awareness and training
- Reporting suspicious activity
- Compliance management
- Reporting procedures

### 8.1 Anti-Bribery & Corruption

The Company operates a zero-tolerance approach to bribery and corruption and maintains a separate [Ebbon Group Anti-Bribery Policy \[PUBLIC\]](#). Bribery and corruption can increase exposure to money laundering and wider financial crime risks and are considered as part of the Company's risk-based control framework.

### 8.2 Risk Assessment

***Our risk-based approach involves: -***

- Identifying the money laundering risks that are relevant to our business.
- Recording these risks on our risk register.
- Carrying out detailed risk assessments on the risks identified and registered.
- Developing controls and procedures to directly manage and reduce the impact of the identified risks.
- Monitoring the controls and improving their efficiency.
- Keeping records of all risk assessments, reviews and improvement action plans.

**When assessing the risks of money laundering and terrorist financing, we consider: -**

- The types of customers we have.
- Where customers, suppliers or other relevant third parties are based, including whether they are linked to high-risk countries or jurisdictions identified by FATF, the UK, the EU, sanctions authorities or other relevant competent authorities.
- Transaction types and volumes.
- Products and services offered and/or activities undertaken.
- Channels for individuals/companies to become customers.
- Third-party reliance and/or use.
- Payment processing (*i.e. cash, transfers (electronic or wire) etc.*)

## 9.0 Reporting Suspected Money Laundering

Employees must promptly report any suspected money laundering, terrorist financing or related suspicious activity to the Compliance team at [compliance@ebbon-group.com](mailto:compliance@ebbon-group.com). Reports should include relevant details, including the parties involved, transaction details, dates, supporting information and the reason for concern.

The Compliance team will review and investigate reported concerns and determine whether any further internal escalation, external reporting or other action is required in accordance with applicable legal and regulatory requirements. Employees must not investigate concerns themselves, notify the customer, supplier or other third party involved, or take any action that could prejudice an investigation.

## 10.0 Standard Due Diligence Assessment

As a B2B solutions provider, the Company typically engages with registered corporate entities. Verification may include checks against Companies House, EU or EEA company registers, customer records and other reliable sources as appropriate. Customer and supplier due diligence may include checks against relevant sanctions lists, high-risk jurisdiction indicators and other reliable sources, where appropriate. Where an entity cannot be verified through standard checks, enhanced background checks may be undertaken to reduce the risk of money laundering or terrorist financing.

## 11.0 Employee Screening

The Company applies employee screening and due diligence controls through its HR and recruitment processes. As part of pre-employment checks, all new Employees are subject to appropriate sanctions screening, and additional checks may be undertaken where required based on role, location, risk profile or legal and regulatory requirements. Relevant procedures provide further detail.

## 12.0 Transaction Monitoring

Incoming transactions are managed by the Finance function and reconciled against customer invoices. Unexpected incoming funds are escalated to the Directors and, where fraud, money laundering or terrorist financing is suspected, reported to the appropriate competent authority in accordance with applicable legal and regulatory requirements.

Payments to suppliers and Employees are subject to appropriate authorisation controls. Unusual payments require written shareholder approval. Business expense claims and payments are subject to the controls set out in the Ebbon Group Anti-Bribery & Corruption Policy [PUBLIC]. Financial transactions follow the Company's four-eyes control process and are subject to external audit.

## 13.0 Records Management

Records are retained in accordance with the Company's retention schedule and applicable legal, statutory and regulatory requirements. AML-related records are generally retained for seven years, unless a longer or shorter period is required by law, regulation, contract or Company policy. Records may include:

- Identification and verification records
- Transaction lists
- Audit and review records
- Staff training files and assessment logs

## 14.0 Training

The Company provides Anti-Money Laundering and Financial Crime training to relevant Employees, including those involved in transaction processing, finance activities, supplier management, customer onboarding, sales, account management or establishing business relationships. Training supports awareness of this Policy, suspicious activity indicators, reporting routes and the legal and regulatory importance of maintaining effective AML controls.

AML training is provided during onboarding where relevant to the role and periodically thereafter, using a risk-based approach. Training may include recognising red flags, understanding high-risk countries and sanctions risks, applying due diligence requirements, escalating unusual activity, and reporting suspected money laundering or terrorist financing to the Compliance team.

Examples of AML red flags may include unusual payment patterns, unexpected overpayments or refunds, reluctance to provide requested due diligence information, inconsistent or incomplete customer or supplier details, requests to use unusual payment routes, links to high-risk countries or sanctioned parties, unexplained third-party payments, transactions that do not appear to match the customer's or supplier's normal business activity, or attempts to avoid normal approval, onboarding or reporting processes.

Records of AML training completion are retained in accordance with the Company's records management requirements. Training content and completion requirements are reviewed periodically to ensure they remain appropriate to the Company's money laundering, terrorist financing and wider financial crime risk profile.

## Appendix – Relevant Regulations

The Company is primarily subject to UK anti-money laundering and counter-terrorist financing legislation. Where the Company operates or conducts business in the EU, EEA or other relevant jurisdictions, equivalent local legal and regulatory requirements may also apply. Relevant legislation and frameworks include:

- The Terrorism Act 2000 (*as amended by the Anti-Terrorism Crime and Security Act 2001 (ATCSA) and the Terrorism Act 2006 (TA 2006)*)
- Proceeds of Crime Act 2002 (*as amended by the Serious Organised Crime & Police Act 2005*)
- Anti-Terrorism, Crime & Security Act 2001
- The Serious Crime Act 2007
- Criminal Finances Act 2017
- Terrorist Asset-Freezing etc. Act 2010
- Counter-terrorism Act 2008 (*Schedule 7*)
- The Money Laundering, Terrorist Financing and Transfer of Funds (*Information on the Payer*) Regulations 2017 (*including amendments*)
- Relevant EU anti-money laundering and counter-terrorist financing frameworks, including applicable directives, regulations and local implementing laws where relevant.

This appendix is intended as a high-level reference only. The Company will monitor relevant legal and regulatory developments and update this Policy, procedures and controls where required.

**End of Document**