

Ebbon

— GROUP —

Policy Name	Ebbon Group Modern Slavery Policy
Version	3.0
Document Owner	Ebbon Group CEOs
Document Classification	PUBLIC

Change Log

Version	Date	Authored By	Authorised By	Details
0.1	11/12/2023	Steve Molyneux		Draft for review
0.2	09/01/2024	Terry Hiles		1 st review
1.0	09/01/2024	SM/TH		Published
2.0	10/03/2025	Lauren Miller	vCISO	Document rebranded, classified and correct version control implemented. Annual review completed
2.1	13/04/2026	Lauren Miller		Annual review – policy name amended to Modern Slavery Policy; document sent to Group HR Manager to review
2.2	09/06/2026	Lauren Miller		Updates following feedback from Group HR Manager
3.0	16/06/2026	Lauren Miller	Ebbon Group CEOs	Document authorised for publishing

Table of Contents

1.0	Overview	1
2.0	Abbreviations/Definitions	1
2.1	Abbreviations	1
2.2	Definitions	1
3.0	Policy	1
4.0	Responsibility for the Policy	1
5.0	Compliance with the Policy	2
6.0	Organisational Structure and Supply Chains	2
6.1	Our Business Activities	2
6.2	Countries of Operation	2
6.3	Risk Assessment	3
7.0	Supplier Due Diligence Processes for Slavery and Human Trafficking	3
8.0	Training, Communication & Awareness of this Policy	3
9.0	Breaches of this Policy	4
10.0	Review of the Policy	4

1.0 Overview

Ebbon Group Limited has a zero-tolerance approach to modern slavery. We are committed to acting ethically and maintaining proportionate controls to help prevent modern slavery in our business and supply chains.

The Company is not required to publish a formal annual statement under section 54 of the Modern Slavery Act 2015, as it does not meet the statutory threshold.

2.0 Abbreviations/Definitions

2.1 Abbreviations

CEO – Chief Executive Officer

MD – Managing Director

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

EEA – European Economic Area

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 direct suppliers of goods or services to the Company and their suppliers.

Act – means the Modern Slavery Act 2015, including any amendments or updates.

Employees – means permanent employees and individuals engaged by the Company on a temporary or fixed-term basis, including individuals on secondment, 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.

Modern Slavery – means the offences and conduct described in sections 1 and 2 of the Act.

3.0 Policy

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. It is a criminal abuse of human rights and involves exploiting people for personal or commercial gain.

We are committed to transparency in our business operations and supply chains and to complying with the Modern Slavery Act 2015.

We expect employees, contractors, suppliers and business partners to meet the same standards. Our contracts prohibit forced, compulsory or trafficked labour, slavery and servitude, and we expect suppliers to promote equivalent standards in their own supply chains.

This policy applies to all Employees and Associated Persons.

4.0 Responsibility for the Policy

The Company is responsible for ensuring this policy meets legal and ethical obligations and is followed by those under its control.

Overall ownership sits with the Ebbon Group CEOs. Day-to-day implementation, monitoring, queries and control reviews sit with the Directors, Managing Directors and senior management.

Managers must ensure their teams understand this policy, follow it and receive appropriate modern slavery training.

Questions or comments about this policy may be raised with the Directors or by email to compliance@ebbon-group.com.

5.0 Compliance with the Policy

- Employees must read, understand and comply with this policy.
- Everyone working for us, or under our direction or control, is responsible for helping to prevent, detect and report modern slavery.
- You must not engage in any activity that could breach this policy or create the appearance of such a breach.
- Report any actual or suspected breach as soon as possible to your line manager, a Company Director, or compliance@ebbon-group.com.
- Raise concerns early, even if you are unsure whether modern slavery has occurred.
- Concerns may also be raised under the Ebbon Group Whistleblowing Policy & Procedure. Reports made in good faith will be handled sensitively and escalated appropriately.
- Reports will be assessed by seriousness, urgency and potential worker impact. Confidentiality will be respected where reasonably practicable, and retaliation or victimisation for raising a genuine concern in good faith will not be tolerated.
- Where appropriate, and with the welfare and safety of workers as the priority, we will support suppliers in addressing coercive, abusive or exploitative working practices within their own operations and supply chains.

If you believe you have experienced detrimental treatment for raising a concern, report it to your line manager immediately. Employees may also raise it under the [Ebbon Group Whistleblowing Policy & Procedure \[PUBLIC\]](#).

6.0 Organisational Structure and Supply Chains

6.1 Our Business Activities

This policy applies to the following business activities of the Company:

- Hosted software services in the United Kingdom and Europe supporting the order-to-delivery process for leased vehicles and the movement of vehicles within the global fleet sector; and
- Hosted software services in the United Kingdom enabling third-party customers to monitor and report on driver, vehicle and associated equipment compliance as part of their wider duty of care obligations.

To provide these services, the Company procures the following:

- Computer software and hardware from recognised manufacturers that are committed to preventing modern slavery and human trafficking and, where required, publish statements in support of that commitment. The Company also uses Microsoft hosting services in the United Kingdom and the EU.
- Data licensed from private sector organisations and government agencies that are committed to addressing modern slavery and human trafficking; and
- Other UK and EEA-based organisations providing complementary services, including hosted data services and equipment, that commit to preventing slavery and human trafficking.
- External modern slavery training for Group HR, Directors and senior managers.

6.2 Countries of Operation

The Company currently operates in the following regions:

- The United Kingdom

- The European Union

6.3 Risk Assessment

Modern slavery risk may arise in any supply chain, particularly where goods or services involve higher-risk sectors, geographies, subcontracting, limited transparency, adverse media or regulatory concerns, unusually low pricing, unrealistic delivery timescales, or concerns about worker treatment, conditions or hours.

The Company assesses whether activities, suppliers or locations present an increased risk of modern slavery or human trafficking.

This assessment considers public risk information, supplier category, location and any relevant concerns or incidents.

The Company purchases IT and communications hardware as part of its normal business operations. Modern slavery risk in this area is managed through proportionate risk assessment, supplier due diligence and contractual controls designed to reduce the risk of modern slavery within the supply chain.

The Company does not directly source raw minerals in delivering its services.

Responsibility for the Company's modern slavery controls is allocated as follows:

- Policies: the Directors, supported by senior management, are responsible for the creation, review and maintenance of this policy and related controls.
- Risk assessments: the relevant Managing Director is responsible for assessing modern slavery risk by considering the goods or services supplied, supplier location, and other relevant risk indicators.
- Due diligence: the relevant Managing Director is responsible for overseeing due diligence and escalation in relation to known or suspected instances of modern slavery connected with the Company or its activities.

7.0 Supplier Due Diligence Processes for Slavery and Human Trafficking

The Company carries out proportionate due diligence when onboarding new suppliers and reviewing existing suppliers. This may include checking supplier modern slavery commitments, available information, and our knowledge of the supplier relationship.

Due diligence is risk-based. It may consider supplier location, sector, goods or services, contract value or criticality, subcontracting, adverse information, supplier statements, codes of conduct, contractual commitments, questionnaire responses, certifications or audit evidence. Outcomes may include approval, approval with conditions, requests for more information, remediation, escalation, rejection, suspension or termination. Evidence and decisions will be retained under internal procurement and supplier management processes.

If a supplier breaches, or is likely to breach, this policy, the Company will require appropriate remedial action. Serious concerns, failed remediation or material incidents will be escalated to the relevant Managing Director and, where appropriate, the Ebbon Group CEOs.

Where a concern is identified, the Company will assess its nature, severity, urgency and potential worker impact. The matter will be recorded, escalated where needed, and investigated with the supplier or relevant party. Any remediation plan must prioritise worker welfare, include clear actions and timescales, and be monitored to completion. If the concern is serious or unresolved, the Company may suspend, restrict or terminate the relationship.

Key supplier relationships will be reviewed periodically on a risk basis.

Any investigation conducted will be stored by the Compliance team in a secure restricted area on SharePoint with access restricted to the Compliance team, Group HR Manager and Ebbon Group CEOs.

8.0 Training, Communication & Awareness of this Policy

Relevant personnel will receive training on this policy and the modern slavery risks linked to our business and supply chains. Refresher information will be shared through internal channels. Training may cover warning signs, reporting routes, whistleblowing protections, supplier due diligence, escalation, remediation and record keeping. Procurement, recruitment, HR, supplier management and senior management roles may receive additional role-specific training.

All employees are required to read and acknowledge this policy as part of their induction. This acknowledgement forms part of the employment record.

Training records and refresher activity will be maintained by the relevant management function, supported by Group HR where appropriate.

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

9.0 Breaches of this Policy

Breach of this policy may result in disciplinary action, up to and including dismissal. The Company may also terminate relationships with individuals or organisations acting on its behalf where they breach this policy.

10.0 Monitoring and Effectiveness

The Company will monitor this policy through proportionate governance activities, including policy acknowledgements, training, supplier due diligence, supplier reviews, reported concerns, remediation actions and material changes in business or supply chain risk.

Findings will be considered during management oversight and the annual review. Actions will be assigned and tracked where weaknesses or improvements are identified.

11.0 Review of the Policy

This policy will be reviewed at least annually, or sooner following material changes in law, business operations, supply chain risk or governance. The Ebbon Group CEOs own this policy, with support from senior management and relevant control owners. Material amendments must be approved through the Company's governance process before publication.

End of Document