



JCG AGRI-ENVIRONMENTAL LIMITED
CULTIVATING TOMORROW

Due Diligence Policy

6th February 2025

1. Introduction

JCG Agri-Environmental Limited is committed to conducting its business with the highest standards of integrity and responsibility. This Due Diligence Policy outlines the procedures and measures that the company will follow to ensure compliance with legal, regulatory, and ethical standards in all its operations.

2. Purpose

The purpose of this policy is to:

- Ensure that all business activities are conducted in a manner that is ethical and compliant with applicable laws and regulations.
- Identify and mitigate potential risks associated with business transactions and relationships.
- Protect the company's reputation and maintain the trust of stakeholders.

3. Scope

This policy applies to all employees, directors, and representatives of JCG Agri-Environmental Limited. It covers all business activities, including but not limited to:

- Mergers and acquisitions
- Joint ventures
- Supplier and vendor relationships
- Customer engagements
- Financial transactions

4. Due Diligence Procedures

4.1 Risk Assessment

- Conduct a thorough risk assessment for all potential business transactions and relationships.
- Identify potential legal, financial, operational, and reputational risks.

4.2 Information Gathering

- Collect relevant information about the parties involved in the transaction or relationship.
- Verify the accuracy and completeness of the information obtained.



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4.3 Evaluation and Analysis

- Evaluate the information gathered to assess the potential risks and benefits.
- Analyse the impact of the transaction or relationship on the company's operations and reputation.

4.4 Decision Making

- Make informed decisions based on the evaluation and analysis.
- Seek approval from senior management or the board of directors, as required.

4.5 Monitoring and Reporting

- Continuously monitor the transaction or relationship to ensure ongoing compliance with this policy.
- Report any significant findings or concerns to senior management.

5. Responsibilities

- **Employees:** All employees are responsible for adhering to this policy and reporting any potential risks or concerns.
- **Management:** Management is responsible for implementing and enforcing this policy.
- **Board of Directors:** The board of directors is responsible for overseeing the company's due diligence efforts and ensuring compliance with this policy.

6. Review and Update

This policy will be reviewed and updated periodically to ensure its continued relevance and effectiveness. Any changes to the policy will be communicated to all employees and stakeholders.

7. Contact Information

For any questions or concerns regarding this policy, please contact:

Jason Gale, Director JCG Agri-Environmental Limited 17 King Edwards Road, 2nd Floor College House, Ruislip, HA4 YAE, London, +44 (0) 203 540 1770.



Jason Gale, M.I. Soil Sci., MBIAC

Director



JCG AGRI-ENVIRONMENTAL LIMITED
CULTIVATING TOMORROW

Anti-Fraud Policy

6th February 2025

1. Introduction

JCG Agri-Environmental Limited ("the Company") is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines the Company's stance on fraud and the procedures for preventing, detecting, and responding to fraud.

2. Definition of Fraud

Fraud is defined as any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. This includes, but is not limited to:

- Theft, embezzlement, or other misappropriation of assets.
- False representation or concealment of material facts.
- Bribery or corruption.
- Forgery or alteration of documents.
- Unauthorized use of Company property or information.

3. Scope

This policy applies to all employees, officers, directors, consultants, contractors, and any other parties with a business relationship with the Company.

4. Responsibilities

- **Employees:** All employees are responsible for adhering to this policy and reporting any suspected fraud.
- **Management:** Management is responsible for implementing and maintaining effective internal controls to prevent and detect fraud.
- **Audit Committee:** The Audit Committee is responsible for overseeing the investigation of any reported fraud and ensuring appropriate actions are taken.



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5. Prevention

The Company will take the following steps to prevent fraud:

- Conduct thorough background checks on new employees.
- Implement and maintain robust internal controls.
- Provide regular training on fraud awareness and prevention.
- Encourage a culture of honesty and ethical behaviour.

6. Detection

The Company will employ various methods to detect fraud, including:

- Regular audits and reviews of financial transactions.
- Monitoring of key financial and operational indicators.
- Encouraging employees to report suspicious activities through a confidential reporting system.

7. Reporting

Any employee who suspects fraud must report it immediately to their manager or the designated fraud officer. Reports can also be made anonymously through the Company's whistleblower hotline.

8. Investigation

All reports of suspected fraud will be taken seriously and investigated promptly. The investigation will be conducted in a confidential and impartial manner. The Company will take appropriate disciplinary action, up to and including termination of employment, against any individual found to have committed fraud.

9. Response

In the event of confirmed fraud, the Company will:

- Take appropriate disciplinary action against the perpetrator.
- Seek to recover any losses incurred.
- Review and strengthen internal controls to prevent future occurrences.
- Report the fraud to relevant authorities if necessary.

10. Review

This policy will be reviewed annually by the Audit Committee to ensure its effectiveness and compliance with applicable laws and regulations.

11. Contact Information

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Director



JCG AGRI-ENVIRONMENTAL LIMITED
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Anti-Corruption Policy

6th February 2025

1. Introduction

JCG Agri-Environmental Limited ("the Company") is committed to conducting its business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure corruption is prevented. The Company has zero tolerance for corruption and is committed to acting professionally, fairly, and with integrity in all its business dealings and relationships.

2. Purpose

The purpose of this policy is to:

- Set out the Company's responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption.
- Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

3. Scope

This policy applies to all employees, officers, consultants, contractors, and any other third-party representatives working on behalf of the Company.

4. Definition of Corruption

The purpose of this policy is to:

- Set out the Company's responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption.
- Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

5. Bribery

Bribery is the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty. The Company prohibits:

- The offering, giving, or promising of a bribe.
- The acceptance of a bribe.



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6. Gifts and Hospitality

The Company recognises that the giving and receiving of gifts and hospitality can be part of building normal business relationships. However, any gift or hospitality must be:

- Reasonable and justifiable in all the circumstances.
- Approved in advance by a senior manager.

7. Responsibilities

All employees and those under the Company's control are responsible for:

- Reading, understanding, and complying with this policy.
- Avoiding any activity that might lead to, or suggest, a breach of this policy.

8. Reporting Concerns

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption or reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place.

9. Monitoring and Review

The Company will monitor the effectiveness and review the implementation of this policy regularly, considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible.

10. Contact Information

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