



JCG AGRI-ENVIRONMENTAL LIMITED  
CULTIVATING TOMORROW

## Anti-Fraud Policy

6<sup>th</sup> 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

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

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