Anti Bribery Policy

Technical advisers on environmental issues

Purpose
The purpose of this policy is to set out how MJCA comply with the Bribery Act 2010. The Bribery Act makes bribery by individuals punishable by up to ten years of imprisonment and there is also an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and financial consequences for MJCA.

It is our policy to conduct all of our business in an honest, professional and ethical manner.

Policy statement
Bribery is the offering, giving, receiving, or soliciting of something of value for the purpose of inducement of action which is illegal or a breach of trust.

Employees should not accept any gift or offer to anyone any inducement, favour or hospitality that may put themselves or MJCA, or appear to put themselves or MJCA, under an obligation of any person or business doing or seeking to do business with MJCA. Any approach from actual or potential clients, contractors or suppliers seeking favoured treatment must be firmly declined and reported to the HR Department at the earliest opportunity.

It may not always be easy to determine whether a possible course of action is appropriate. If there is any doubt as to whether a possible act might be in breach of this policy then employees are instructed to refer their concerns to the HR Department.

Gifts and hospitality
This policy is not intended to prohibit the giving or receiving of gifts or hospitality of a modest value that are offered to or from staff by or to a third party. These gestures are acceptable provided that there is no suggestion that a return favour of any sort will be expected or implied.

Employee responsibilities
The prevention, detection and reporting of bribery or corruption is the responsibility of all employees. All employees must comply with this policy and must notify the HR Department as soon as possible if they believe or suspect that a conflict with or breach of this policy has occurred or if they become aware of a breach that may occur in the future.

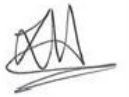
Any employee who breaches this policy will face disciplinary action which could result in dismissal for gross misconduct.

Record-keeping
MJCA keep financial records and have appropriate internal controls in place to record business reasons for making payments to and receiving payments from third parties.

Communication of the policy
Employees are provided with details of this policy with their company staff handbook when they join MJCA

Who is responsible for the policy?
The Board of Directors have overall responsibility for confirming that this policy properly implements our legal and ethical obligations.

Monitoring and review
This policy will be monitored for effectiveness and reviewed annually.



Leslie Heasman – Managing Director

Last reviewed date: June 2026
Issue date: June 2026
Issue Number: 002